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1. CHAIRMAN'S MESSAGE

Dear valued stakeholders.

On behalf of the board of directors of GT Group Holdings Limited (the "Company"), I am pleased to present the 2019 Environmental, Social and Governance Report of the Company and its subsidiaries (collectively referred to as the "Group").

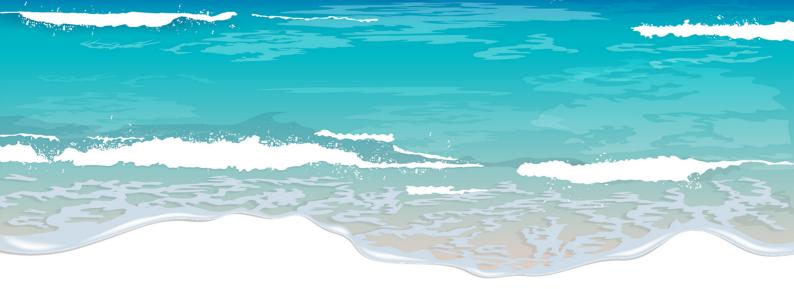
The Group is committed to fulfill the corporate responsibility in its daily operations and deliver quality products and services. As a socially responsible enterprise, the Group has introduced various initiatives to minimise the impacts on the environment and society.

The success of the Group depends greatly on its ability to attract and retain talents. The Group provides competitive remuneration packages and dedicates resources to ensure employees grow in competence and skill sets along with the business. During the year of 2019, the executives of the Group were engaged in a range of external seminars on the latest regulatory updates and corporate governance matters.

Due to the nature of principal business activities of the Group, the environmental impacts of the Group are limited. However, the Group continues to minimise waste generation and pollution at its office premise through the use of electronic means of communication, filing and documentation. It also implements the initiatives of energy and water conservation for promoting sustainability concepts.

The Group shall continue to generate enduring value for our stakeholders and the larger community. I would like to take this opportunity to thank our stakeholders for their continuous support.





2. INTRODUCTION

GT Group Holdings Limited (the "Company", together with its subsidiaries, the "Group") is principally engaged in brokerage and securities investment, trading of goods, financing and property development businesses. The Group considers social and environmental responsibilities as one of the core values in its business operations and it strives for greater sustainability and transparency, as well as to deliver service that foster a sustainable environment for future generation.

This report summarises several subjects of the Group's business practices for the Environmental, Social and Governance Report (the "ESG Report") and its relevant implemented policies and strategies in relation to the Group's operational practices and environmental protection. For information regarding corporate governance, please refer to the section "Corporate Governance Report" in the Annual Report of the Company for the year ended 31 December 2019.

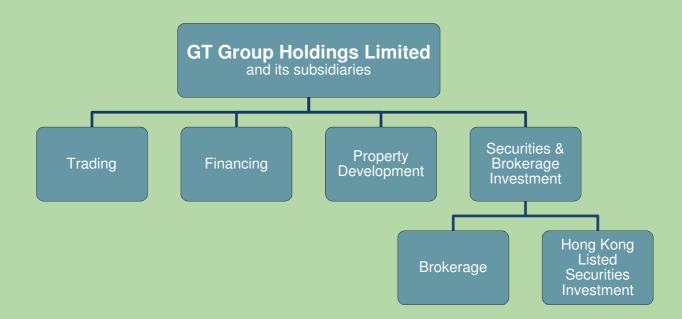
The time frame of this ESG Report is from 1 January 2019 to 31 December 2019 (the "Reporting Period" or the "FY2019").

3. REPORTING FRAMEWORK

The ESG Report has been prepared in accordance with reference to the Environmental, Social and Governance Reporting Guide (the "ESG Reporting Guide"), as set out in Appendix 27 of the Rules Governing the Listing and Securities on The Stock Exchange of Hong Kong Limited.

The general disclosure of the environmental and social policies and measures, as well as the compliance issues cover the entire Group, while the disclosure scope of the environmental key performance indicators (the "KPI(s)") section of the ESG Report only covers the Group's headquarter in Hong Kong. There were no changes to the reporting scope compared to the previous reporting period.

Business Structure of the Group



4. STAKEHOLDERS' ENGAGEMENT

The Group believes that understanding the views of the stakeholders lays a solid foundation to the long-term growth and success of the Group. Therefore, the Group maintains regular communication with the key stakeholders, including employees, customers, suppliers, business partners, investors, government and community.

The Group develops multiple channels for its stakeholders to express their views on the Group's sustainability performance and future strategies. These channels can reinforce mutual trust and respect between the Group and its stakeholders and shape the Group's business strategies to fulfill the stakeholders' needs and expectations.



The channels are summarised in the following table:

Stakeholder Groups	Engagement channels	Possible concerned issue
Investors	Interim report, annual report, circular, general meeting(s), corporate website	Business strategies and financial performance, corporate governance, business sustainability
Customers	Direct communication and emails, complaint hotlines, opinion boxes, customer surveys	Service quality, timely service, customers security, privacy protection
Employees	Interviews, trainings, internal memorandums and/or emails	Rights and benefits, employee compensation, training and development, working hours, occupational health and safety
Suppliers and business partners	Business meetings, tenders	Fulfillment of promises, payment schedule
Government	Statutory filings	Compliance to the law and regulations, fulfillment of tax obligation
Local community	Developing community activities, employee voluntary activities, donations and sponsorships	Business ethics, fair employment opportunities, collaborative development, environmental protection

5. MATERIALITY ASSESSMENT

Sustainable development encompasses a spectrum of environmental and social aspects. It is crucial for the Group to determine the material aspects in order to harness the related risks and opportunities. The Group adopted a three-step process of identification, prioritisation and validation to ensure sustainability topics are being managed and reported in accordance with their materiality.

(1) Identification

The Group identified all fundamental sustainability topics in accordance with the ESG Reporting Guide. In the context of the latest sustainability landscape, the Group determined the following 18 topics that are deemed to have an impact on the environment and society through its operations:

	ESG Aspects	Materia	al ESG issues for the Group
	A1 Emissions	1.	Air emissions
ntal	A2 Use of Resources	2.	Greenhouse gas emissions
nme	A3 The Environment and	3.	Waste management
Environmental	Natural Resources	4.	Energy consumption
호		5.	Water consumption
Ą		6.	Paper consumption
		7.	Environmental risk management
	B1 Employment	8.	Human resources practices
	B2 Health and Safety	9.	Remuneration policies
	B3 Development and Training	10.	Equal opportunity
	B4 Labour Standards	11.	Employees' health and workplace safety
<u>la</u>	B5 Supply Chain Management	12.	Employee development
Social	B6 Service Responsibility	13.	Anti-child and forced labour
e.	B7 Anti-corruption	14.	Supplier practices
	B8 Community Investment	15.	Service quality and customer satisfaction
		16.	Protection of customers' data privacy
		17.	Anti-corruption and anti-money laundering
		18.	Community investment



(2) Prioritisation

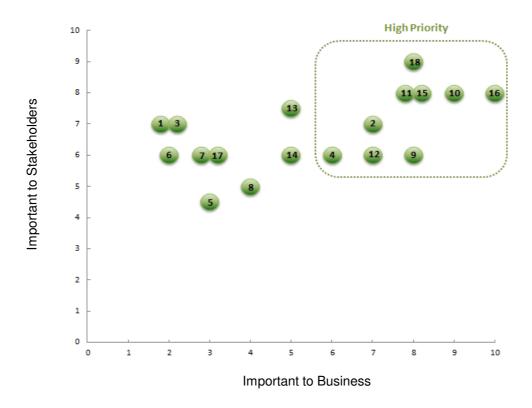
The Group sought the views of the senior management in Hong Kong to determine the materiality of the selected environmental, social and governance (the "ESG") topics, as the senior management possesses a high-level view of all the topics and has access to the feedback of the stakeholders. The senior management was asked to score the significance of each ESG topic to stakeholder groups and the Group in each of their perspectives.

(3) Validation

The senior management reviewed and validated the materiality process and the ESG Report discloses the Group's performance on all high and low materiality topics.

Materiality Matrix

The following materiality matrix was derived and the topics in the topmost-right quadrant of the materiality matrix represent the highly material topics:



Number	Highly material topics
16	Protection of Customers' Data Privacy
10	Equal Opportunity
18	Community Investment
11	Employees' Health and Workplace Safety
15	Service quality and customer satisfaction
9	Remuneration Policies
2	Greenhouse Gas Emissions
12	Employee Development
4	Energy Consumption

These areas will become the leading priorities in the ESG strategy. The Group believes that it will contribute significantly to the Group's sustainable development on a long-term basis.

6. APPROACH TO SUSTAINABILITY DEVELOPMENT

As a responsible enterprise, the Group continues to step up implementing in sustainability to maintain efficiency measures as well as meeting the standards of the customers. To better inform the Group's investors and stakeholders for assessment, the Group has set out below its efforts to minimise the negative influence to the environment, promote the employees' well-being and contribute to the community during the Reporting Period.



7. CORPORATE SOCIAL RESPONSIBILITY

During the Reporting Period, the Group has integrated various aspects of environmental and social topics, applicable to the Group with the following objectives:

- to uphold economic, environmental and social aspects beyond legal obligation in its long-term business strategies;
- to embed environmental stewardship into the Group's business culture, consider the full scope of its impact on the natural environment and communities;
- to look into social-economic aspects and develop global strategies that have local relevance for building a sustainable and profitable future; and
- to increase informative channels to enhance the stakeholders' knowledge in environmentalfriendly practices that could lead to enhance operational efficiency and cost-saving.



8. ENVIRONMENTAL

The Group is committed to environmental sustainability by seeking solutions to minimise the environmental impact of its operations, with a particular focus on reduction of greenhouse gas emissions and preservation of resources. As a socially responsible enterprise, the Group has instituted various policies and guidelines aiming to minimise its environmental impact and sustain its operational efficiency. The employees are reminded the well-being of their working environment through various channels, including emails, notices and promotion slogans. The Group will continue to strive for enhancement in energy efficiency reduction in carbon emissions in the offices.



Aspect A1: Emissions

The Group ensures all discharges to the atmosphere and land is compliant with regulatory standards. During the Reporting Period, the Group was not aware of any material breaches of or non-compliance with relevant laws and regulations related to air emissions and handling of non-hazardous waste.

Air Emissions

The Group's air emissions are solely generated from petrol consumption of vehicles. During the Reporting Period, the Group has conducted regular vehicle maintenance and proper tuning to maximise fuel efficiency. The Group also employees encourages to use public transportation to replace various emissionproducing vehicles with fewer transit vehicles that generally emit less pollution on a per person basis. The major applicable laws and regulations related to control of air emissions include, but not limited to, the Air Pollution Control Ordinance of Hong Kong.

During the Reporting Period, the Group's vehicles emitted 16.8 kg of Nitrogen oxides (NOx), 0.5 kg of Sulphur oxides (SOx) and 1.2 kg of Particulate matter (PM).

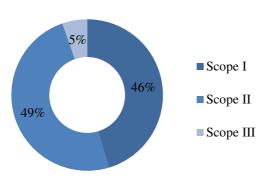
Air emissions	FY2019(kg)	FY2018(kg)	YOY* change
Nitrogen oxides (NOx)	16.8	10.9	54%
Sulphur oxides (SOx)	0.5	0.3	54%
Particulate matter (PM)	1.2	0.8	54%

^{*} YOY define as "year-on-year"

Greenhouse Gas (GHG) Emissions

The Group's carbon footprint is primarily generated from mobile combustion (Scope I) and electricity usage (Scope II). During the Reporting Period, the Group generated a total of 184 tonnes of carbon dioxide equivalent (tCO2e) of greenhouse gases (Scope I and II), resulting in a carbon intensity of 3.02 tCO2e per employee.

GHG Emissions in FY2019



The Group is committed to reduce its carbon footprint. The greenhouse gas emissions under Scope I and II are addressed through the Group's energy reduction initiatives under Section A2.1 Energy Consumption, while Scope III emissions is generated throughout its value chain. During the Reporting Period, the Group has employed various measures to minimise such emissions. The Group aims to prioritise video-conferencing and other means of electronic communication in place of taking overseas business trips. Further, the Group also encourages employees to create a more sustainable workplace through emails, notices and promotion slogans. All departments are required to follow the internal environmental management system strictly to ensure its compliance with laws and regulations.

Greenhouse gas emissions	FY2019 (tCO ₂ e)	FY2018 (tCO₂e)	YOY change
Scope I (Direct Emissions)	88.2	57.3	54%
Mobile combustion	88.2	57.3	54%
Scope II (Indirect Emissions)	95.8	96.2	0%
Electricity purchased	95.8	96.2	0%
Scope III (Other Indirect Emissions)	10.3	14.1	(27%)
Business air travels	7.2	11.1	(35%)
Paper waste decomposition at landfills	3.1	3.0	2%
Total (Scope I and II)	184.0	153.5	20%
(Scope I, II and III)	194.3	167.6	16%

Carbon intensity		FY2019 (tCO ₂ e)	FY2018 (tCO ₂ e)	YOY change
Greenhouse gas	(Scope I and II)	3.02	2.69	12%
emission per employee	(Scope I, II and III)	3.18	2.94	8%

Hazardous Waste

During FY2019, the Group did not generate any significant hazardous waste as the scope of the ESG Report is limited to the office working environment.

Non-Hazardous Waste

The non-hazardous waste generated in the Group's office was mainly composed of paper and general waste. During the Reporting Period, the Group generated 640 kg of paper waste which was disposed at landfills, resulting in the non-hazardous waste intensity of 10.49 kg per employee. The major applicable laws and regulations related to control of waste include, but not limited to, the Waste Disposal Ordinance of Hong Kong.

Non-hazardous waste	FY2019 (kg)	FY2018 (kg)	YOY change
Landfill (1)	640.0	621.2	3%
Total non-hazardous waste generated	640.0	621.2	3%

Note:

(1) Collected data only consists of paper waste.

Non-hazardous waste intensity	FY2019 (kg)	FY2018 (kg)	YOY change
Non-hazardous waste generated per employee	10.49	10.90	(4%)

The non-segregated waste and recyclables of the Group are handled by contractors. To aid this process, the sorting methods of recyclables are clearly labelled on recycling bins. During the Reporting Period, the Group employed the following measures and initiatives to reduce the generation of waste:

- utilises electronic systems for filing and documentation, which significantly reduces the use of papers;
- (2) adopts eco-printing modes for all employees and encourages staff to make double-sided copies when possible; and
- (3) encourages the use of electronic forms of communication for directories, forms, reports and storage whenever possible.

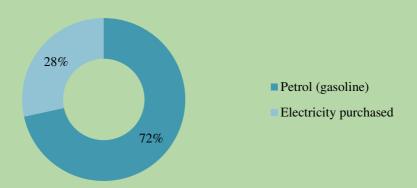
Aspect A2: Use of Resources

The Group is committed to continually monitor and improve resource efficiency as an integral part of its business strategy and operating methods. However, due to the Group's business nature, it did not consume significant amount of packaging material as it had no industrial products or any factory facilities during the Reporting Period. The following describes the approach to manage the energy and water resources consumption.

Energy

FY2019, During the Group's energy consumption consists of the use of petrol for the Group's vehicle fleet and electricity for our office-based operations, which accounted for 72% and 28% of the Group's total energy consumption respectively. The Group conducts periodic internal review of fuel and electricity consumption to help determine avoidable energy usage and highlight avenues for more efficient fixtures, equipment and devices. During the Reporting Period, the Group consumed 1,087.6 GJ and 431 GJ of direct and indirect energy respectively, resulting in a total energy intensity of 24.9 GJ per employee.

Energy consumption in FY2019



Energy consumption	FY2019 (GJ)	FY2018 (GJ)	YOY change
Direct	1,087.6	707.0	54%
Petrol (gasoline)	1,087.6	707.0	54%
Indirect	431.0	438.6	(2%)
Electricity purchased	431.0	438.6	(2%)
Total (Direct and Indirect)	1,518.6	1,145.6	33%

Energy intensity	FY2019 (GJ)	FY2018 (GJ)	YOY change
Energy consumption	24.9	20.1	24%
per employee			

During the Reporting Period, the Group implemented the following measures and initiatives to minimise its energy consumption:

- installation of energy-saving LED systems across the offices and deployment of maximum natural light possible;
- upgraded of electronic equipment to energy-efficient models where necessary; and
- encouraged employees to switch off all computers and office equipment, electrical and airconditioning systems at the end of each working day.

Water

The headquarter office in Hong Kong operates in a leased premise for which both the water supply and discharge are solely controlled by the building management of the leased premises. Therefore, the provision of water withdrawal and discharge data or sub-meter are not available for disclosure. As part of our efforts to reduce water usage, the Group gives priority to water-saving products in procurement decisions.

Aspect A3: The Environment and Natural Resources

The Group strives to build an eco-conscious culture that ingrains positive lifestyles and habits among employees. It encourages employees to opt for public transportation when commuting to and from offices. The Group also provides eco-friendly office supplies, reusable cups and kitchenware in office.

Employees are one of the key drivers of the Group's long-term success, the Group strives to attract and retain talent with a comprehensive benefit package and safe working environment.

Aspect B1: Employment

The Group provides competitive remuneration package to motivate and retain quality staff. Group generally remunerates employees with reference to their qualifications, experience and work performance as well as to market benchmarks. The promotion and remuneration of the Group's employees are subject to review yearly, relevant laws and regulations are referred to Employment Ordinance (Chapter 57 of the Laws of Hong Kong) and Minimum Wage Ordinance (Chapter 608 of the Laws of Hong Kong). Benefits offered by the Group to its employees included discretionary bonus, Mandatory Provident Fund Scheme, share options, training subsidies as well as medical insurance.

During the Reporting Period, the Group was not aware of any material breaches of or non-compliance with relevant laws and regulations related to compensation and dismissal, recruitment and promotion, working hours, rest periods, equal opportunity, diversity, anti-discrimination and other benefits and welfare.

Human resources policies

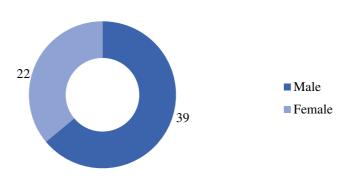
The staff handbook of the Group (the "Staff Handbook") has laid a foundation of key information in relation to the terms and conditions of employment, expectation for employees' code of conducts and behaviours, employees' rights and benefits. The Group continually takes positive action to ensure equal opportunity in the conduct of employment activities: recruitment, hiring, compensation, training and promotion for all staff, regardless of race, color ancestry, national origin, religion, sex, marital status, age, sexual orientation, disability or veteran status. The Group has established and implemented policies that builds a respectful workplace. With an aim to ensure fair and equal protection for all employees, the Group has zero tolerance on sexual harassment or abuse in the workplace in any form, which is a violation of the Labour Law in Hong Kong.

The policies and procedures of the Group incorporated in the Staff Handbook are reviewed and updated on a regular basis. The Group discourages and disallows any behavior that violates the regulations under the Staff Handbook. Offenders will receive oral and/or written warning upon breaches of regulations in the Staff Handbook and the Group has the right to terminate employment contract with offenders for any serious violations.

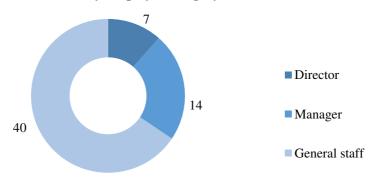
Total workforce by category

As at the end of the Reporting Period, the Group employed a total of 61 employees which were mainly located in Hong Kong. Most employees were male, accounting for 64% and most employees of the Group were aged 50 to 59. In terms of workforce by employee category, approximately 11% and 23% of the Group's employees were directors and managers respectively, with the remaining being general staff. The following charts set forth the staff breakdown in FY2019:

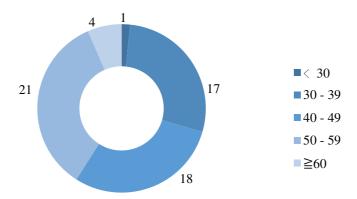
Workforce by gender in FY2019



Workforce by employee category in FY2019



Workforce by age group in FY2019



Turnover rate by category

During the Reporting Period, the Group's employee turnover rate was 3.3%. In terms of gender category, the turnover rates were 2.6% and 4.5% for male and female employees respectively. In terms of age group category, the turnover rates were 5.9% and 5.3% for employes in the age groups of 30-39 years old and 40-49 years old respectively.

Turnover rate	FY2019 (%)	FY2018 (%)	YOY change
Group	3.3	5.3	(38%)
By Gender			
Male	2.6	2.6	0%
Female	4.5	10.5	(57%)
By Age group			
Under 30 years old	0	0	0%
30 – 39 years old	5.9	13.3	(56%)
40 – 49 years old	5.3	6.7	(21%)
50 – 59 years old	0	0	0%
Over 60 years old	0	0	0%

Aspect B2: Health and Safety

The Group strives to provide a safe and healthy working environment and has complied with the Labour Legislation and all other relevant regulations in Hong Kong. The Group has also implemented various policies and measures, such as a non-smoking policy in office. The Group has equipped first-aid boxes in office and organises rescue, fire and evacuation drills on a regular basis.

During the Reporting Period, the Group was not aware of any material breaches of or non-compliance of any relevant laws and regulations in relation to the workplace health and safety and neither work-related fatalities nor work injury was notified. The relevant laws and regulations applicable include, but not limited to, the Occupational Safety and Health Ordinance of Hong Kong.

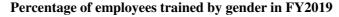


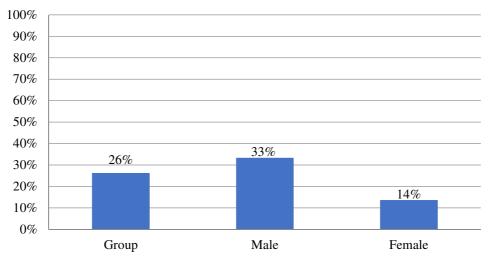
Aspect B3: Development and Training

Training and development is defined as learning undertaken by employees to maintain and advance their skills, knowledge and competencies. To retain the best people in the business operation, the Group offers the employees course fee reimbursement to the employees for encouraging them to study and take any relevant examinations. Education allowance and tuition reimbursement are also given to motivate employees to attend seminars and training organised by professional bodies relevant to their regulated licensed activities and the Group's business. The Group highly encourages its employees to attend external forums and seminars to develop personal skills and expand their knowledge. During the Reporting Period, the Group's executives have enriched their knowledge through a range of external seminars on corporate governance and regulatory updates, as well as handling any disputes among shareholders.

In FY2019, all Directors are provided with training materials covering the topics of "Annual Corporate and Regulatory Update (2019)", "Keeping of the Significant Controllers Register" and "Anti-Money Laundering". While Company Secretary and Financial Controller and Company Secretarial Manager of the Company have attended 20 hours and 15 hours of training sessions respectively, relating to Listing Rules, Companies Ordinance and Securities and Futures Ordinance, etc. In addition, each securities broker of the Group has completed minimum 5 hours of continuous professional training which is required by Securities and Futures Commission every year. All professional employees in the Group are properly licensed and/or registered with its relevant associations in Hong Kong.

During the Reporting Period, the Group provided a total of 86 training hours to employees. In which, a total of 16 staff participants received training, which represents 26% of the Group's employees. In terms of gender category, 33% and 14% of the Group's male and female employees received training respectively.





Aspect B4: Labour Standards

The Group has established and implemented the Staff Handbook which contains policies relating to relevant labour law, regulations and industry practices, covering areas such as, but not limited to, compensation, dismissal, promotion, working hours, recruitment, rest periods, equal opportunities, diversity and other benefits and welfare.

During the Reporting Period, the Group was not aware of any material breaches of or non-compliance of any relevant laws and regulations in relation to child labour and forced labour. Further, no labour disputes have occurred between the Group and employees.



10. OPERATING POLICIES

The Group considers that maintaining a good relationship with its customers, suppliers and business partners are key elements to the long-term success of the Group.



Aspect B5: Supply Chain Management

Due to the nature of the principal business activities of the Group, there were no major suppliers during the Reporting Period. However, the majorities of its suppliers are local businesses, which includes general office suppliers, information technology services and professional consultants.

To integrate the environmental vision into the procurement of office supplies, the Group has avoided disposable products and selects products that use less packaging material. The administration department of the Group has also given priority to environmental-friendly products, such as refillable pens and environmental paper, so as to help raise awareness on sustainable development.

During the Reporting Period, the Group has established supplier management system to ensure internal operation is fully complied with the legal requirements under the Prevention of Bribery Ordinance in Hong Kong.

Aspect B6: Service Responsibility

The Group is committed to provide a quality service that satisfies the needs of customers and to set impartiality and fairness as the centre of its service procedure. During the Reporting Period, the Group was not aware of any material breaches of or non-compliance with relevant laws and regulations related to health and safety, advertising, labelling and privacy matters regarding services provided. The major laws and regulations include, but not limited to, Money Lenders Ordinance, Personal Data (Privacy) Ordinance, as well as Trade Descriptions Ordinance of Hong Kong.

Service quality and customer satisfaction

The Group regards service quality assurance as of topmost importance. During the Reporting Period, the Group has established the administration manual of the Group (the "Manual") that sets out the general practices and procedures for the conduct of business activities. The Manual is subject to review by the management on a regular basis.

Further, the Group has established a client complaints mechanism to monitor the service quality during the Reporting Period. For example, the Financial Controller and Compliance Officer investigate all complaints received related to client assets or improper dealings, such as unauthorised transaction and discrepancies present in client accounts. All complaints raised by clients are dealt with promptly and complaint records are retained.

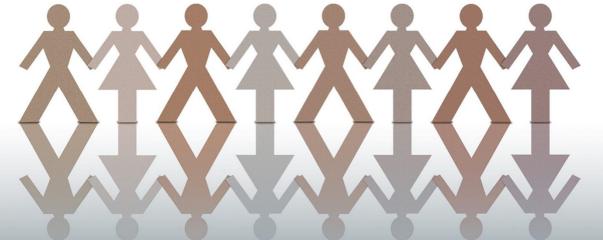
Ethical operating practices

The Group is committed to comply with the Personal Data Ordinance and relevant regulations to handle client information. To avoid any data leakage or misuse, the Group collects and uses client information in a responsible and non-discriminatory manner and have restricted the use of client information for the purposes that are consistent with those identified in engagement contracts. During the Reporting Period, there was no complaint received concerning breaches of client privacy and losses of client data.

Aspect B7: Anti-corruption

The Group strives to attain the highest standards of openness, probity and accountability. The Group believes that sound and reasonable business conduct are essential for the growth of the Group and for safeguarding and maximising stakeholders' interests. As stipulated in the Staff Handbook, all employees are required to carry out their work in an honest and ethical manner. It is every employee's responsibility and it is the interest of the Group to ensure that any inappropriate behaviour or organisational malpractice compromising the interest of the shareholders, investors, clients and the wider public do not occur under any circumstances.

The Group has adopted the code of conduct in Staff Handbook and the Manual which includes provisions for conflicts of interest, prevention of money-laundering, due diligence, bribery and anti-corruption. The Group has zero tolerance for any form of corruption. Thus, the Group has established a whistle-blowing policy to report any corruption. Whistle-blowers can report verbally or in writing to the department or the senior management of the Group with regards to any suspected misconduct with full details and supporting evidence. Employees who have breached anti-corruption policy will face disciplinary action, which could result in dismissal.



During the Reporting Period, the Group was not aware of any material breaches of or non-compliance with relevant laws and regulations related to anti-corruption. The major laws and regulations applicable include, but not limited to, Prevention of Bribery Ordinance of Hong Kong.

Aspect B8: Community Investment

As a responsible enterprise, the Group is committed to participate in the activities which contribute to and support our communities. During the Reporting Period, the Group made a corporate sponsorship of HKD 76,000 to the 40th Anniversary Dinner and Inauguration Ceremony, organised by The Institute of Securities Dealers.



11. SUSTAINABILITY

The Group understands the importance of achieving economic, environmental and social sustainability for the long-term success of its business. The sustainability guidelines lay out its principles and actions for managing and performing ethically and sustainably, throughout its business operations. The Group will continue to deliver safe and quality services served by its team members, without endangering the environment. The Group will also continue to document its progress through disclosures and continue to improve its sustainability strategy and performance.