



STERLING GROUP
— HOLDINGS LIMITED —
美臻集團控股有限公司

(Incorporated in the Cayman Islands with limited liability)
Stock Code: 1825



Environmental,
Social and Governance
(ESG) Report 2019/20

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About Sterling Group

Sterling Group Holdings Limited (hereinafter referred to as the “The Group” or “We”) was listed on Main Board of the Hong Kong Stock Exchange in October 2018 (stock code: 1825). We are an OEM manufacturer of premium woven apparels serving international brands in the U.S. and UK markets. Our mission is to offer value-priced high quality garments with one-stop manufacturing services to our customers, as well as providing opportunities to our employees for their career development while delivering profitable returns to our shareholders. In addition, we strive to create a sustainable business model taking into account the social-economic and environmental impact of our business development. We inculcate a sustainability culture within the Group raising our sense of duty, awareness and commitment to sustainability.

About the report

This is the second Environmental, Social and Governance (“ESG”) Report released by Sterling Group Holdings Limited which is an important channel for us to communicate with stakeholders in regard to our efforts towards social responsibility and sustainability. This report is prepared in accordance with the Appendix 27 Environmental, Social and Governance Reporting Guide to the Rules Governing the Listing of Securities on the Main Board of The Stock Exchange of Hong Kong Limited and follows the “comply or explain” provisions. The reporting period focuses on the activities implemented during fiscal year of 2019 / 2020 (1 April 2019 to 31 March 2020).

This report primarily covers Sterling Group core business activities which include the operations of production facilities below:

Sri Lanka

- Chiefway Katunayake (Pvt) Ltd.
- Chiefway (Pvt) Ltd.

China

- Zhi Wei (Guangzhou) Garment Manufacturing Company Ltd.



The board of directors (“Board”) has overall responsibility for the Group’s ESG strategy and delegated management to compile the report. The Group is committed to pursuing continuous improvement on the environmental and social responsibility by collaborating with Group’s regional management team to formulate the sustainability strategy. We aim to map out our decarbonisation strategy and promote social responsibility while providing a safe workplace for our employees. We develop and utilize Key Performance Indicators (“KPI”) to track the performance and closely monitor the progress with the intention to achieve continuous improvement. The progress will be regularly reported and reviewed by the Board and senior management of the Company.

We value your feedback on this report and our sustainability plan. Should you have any comments and suggestions, please feel free to contact us at sterling-esg@sphk.com.hk.

Garment Delivered
2.75M pcs

Turnover
HKD 590 million

Geographical markets
us 89%
eu 10%
others 1%

Sterling Sustainability Committee (SSC)

To implement the ESG initiative and formulate our Group's sustainability strategy, Sterling Sustainability Committee has been established comprising of senior management and other members of staff with sufficient ESG knowledge, and the authority to promote a company-wide awareness of the importance of the ESG efforts. SSC members span from the leadership team to functional departments to ensure the concepts of environmental and social responsibility are taken into account and integrated in management decisions as well as daily operations.



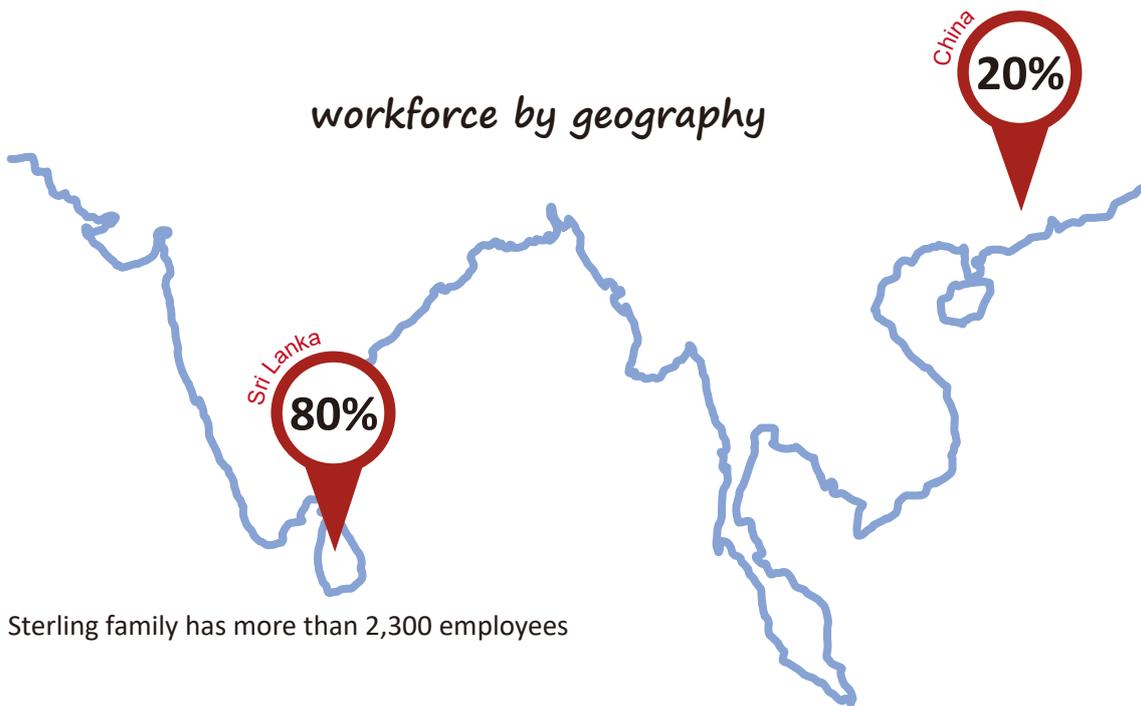
Sustainability Philosophy

Sustainability focuses on meeting the needs of the present without compromising the ability of future generations to meet their needs. The concept of sustainability is composed of three major pillars: economic, environment and social – it is integrated in our operation as profit, planet and people. We have inculcated among our employees the sustainability notion which has become an integral part of our manufacturing and operational activities, seeking to deliver profit and environmental & social benefits in a continuous and synergistic manner.

We believe sustainable industrialization is essential to achieve sustainable development. It will unleash dynamic and competitive economic forces that generate employment and income, and enable efficient use of resources. We have put considerable effort in figuring out the room for improvement by integrating technology which plays a vital role in encouraging manufacturing industries towards sustainable patterns of production, while improving the industry's environmental performance.



workforce by geography

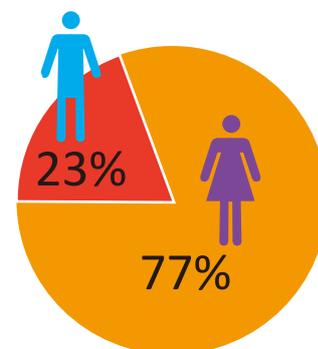


Sterling family has more than 2,300 employees

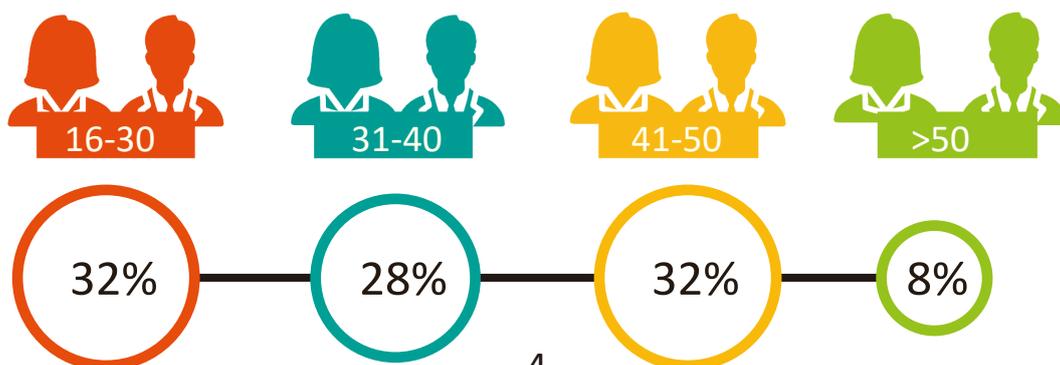
Sterling family

Sterling Group is committed to providing a fair and equitable work environment for all our employees regardless of their gender, age, nationality, religion, sexual orientation or physical abilities. The Group establishes clear employment policies, including compensation and benefits, recruitment and selection, training and development, rewards and promotion, grievance and dismissal, working hours, rest periods, equal opportunity, anti-discrimination and other welfare. We ensure that every employee, regardless which position he/she holds, is treated fairly, lawfully and objectively.

workforce by gender



workforce by age



About the United Nations Sustainable Development Goals

Sterling Group has adopted United Nations' Sustainable Development Goals (SDG) in 2019 as the framework of the ESG reporting to demonstrate our performance in different aspects aiming to make our sustainable activities more outcomes oriented. The Sustainable Development Goals (SDG) is a newer sustainability scoring concept initiated in 2015, which has been driven by the Division for Sustainable Development Goals in the United Nations Department of Economic and Social Affairs (UNDESA), includes 17 SDGs with 169 targets*. The Goals are a call for action by all countries to promote prosperity while protecting the environment. It recognizes that ending poverty must go hand-in-hand with strategies that build economic growth and address a range of social needs including education, health, equality and job opportunities, while tackling climate change and working to preserve our ocean and forests.



By analysing those 17 SDGs with our operations and sustainability strategy, we have mapped out the most relevant SDGs to the Group as the areas where we are able to make contribution and bring positive impact.



* For the details of 169 targets, please refer to <https://sustainabledevelopment.un.org/sdgs>

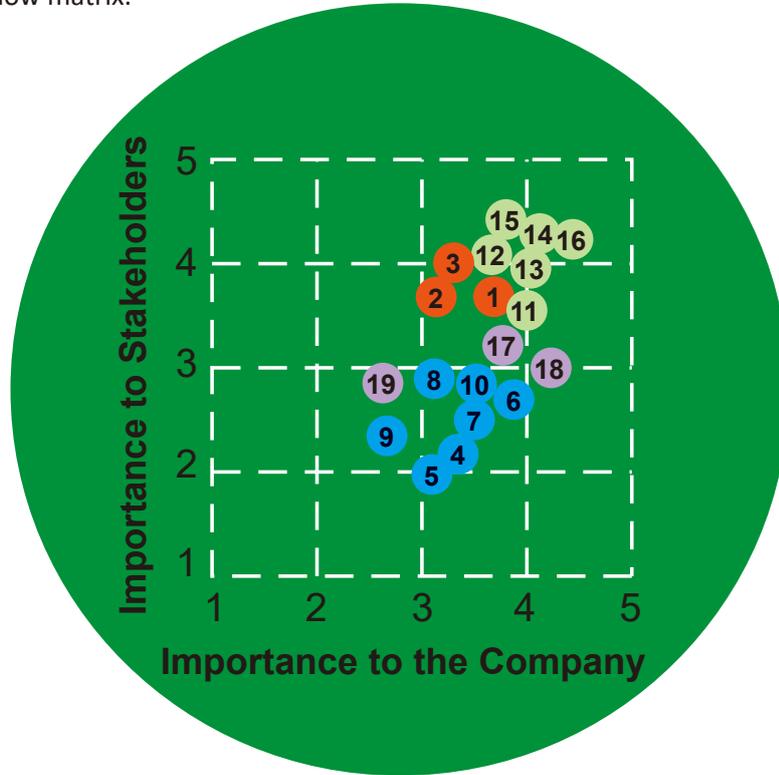
Stakeholder Engagement

Stakeholder engagement is an incubator of our sustainable development plan, which is an important step to gather valuable ideas about ESG issues for materiality assessment in order to identify the focus of our sustainability strategy. We have primarily engaged major stakeholders through various channels and enlarged our scope for this ESG report including staff, customers and board members. Our Sterling Sustainability Committee (SSC) acts as a crucial role to reach out to different stakeholders during stakeholder engagement. We also obtain an understanding of the mindset of different stakeholders via questionnaires which provide us with a comprehensive assessment of different ESG topics.



Sustainability Materiality Assessment

The Group has identified 19 issues which are most material in the context of our business and day-to-day operations. A materiality matrix is developed from the result of stakeholder engagement exercises conducted, the materiality assessment and prioritization are summarized in the below matrix.



Area	Topic
Governance	① Business Performance
	② Risk Management
	③ Law Compliance
Environmental	④ Energy Consumption and Management
	⑤ Water Management
	⑥ Greenhouse Gas Emission
	⑦ Use of Materials
	⑧ Waste Management
	⑨ Transportation Management
	⑩ Chemical Management
Labour	⑪ Employee Diversity and Equal Opportunity
	⑫ Talent Attraction & Retention
	⑬ Employee Benefits
	⑭ Career Development and Training
	⑮ Occupational Safety and Health
	⑯ Employee and Labour Practice
Society Aspect	⑰ Anti-corruption
	⑱ Supplier Social Assessment
	⑲ Community Engagement

Environmental Management

The apparel supply chain is increasingly making a shift towards eco-fashion and promotes sustainable supply chain through collaboration with farms, fabric mills and garment manufacturers. Starting with incoming fabric in garment manufacturing, we perform cut and sewn process, and actively engage with different programs like STANDARD 100 by OEKO-TEX and NATIVA™ in order to ensure sustainability and traceability.



Sterling Group strives to comply with all the relevant environmental laws and regulations. There is no violation of any applicable environmental laws during the reporting period. Our core business is garment manufacturing with primarily a cut and sewn production process, which does not involve any laundry or dyeing process, with no industrial wastewater generated during production in our garment factories. Purchased electricity is the main source of power to operate our facilities, from fabric cutting to garment assembly and packing for delivery. The production process primarily includes cutting, sewing, pressing, finishing and packing. There is no direct industrial pollution, significant air emission and hazardous waste. The only non-hazardous wastes are fabric scraps and discarded cartons, which totalled around 305 tonnes in 2019/20 with intensity 0.22kg / garment produced, all those wastes are collected by professional company for further processing or recycling.

We adopted the following basic measures among our business units including Hong Kong office:

- Turn off unnecessary air conditioning and lighting during lunch hours and non-essential hours.
- Turn off idling equipment after work.
- Use energy efficient LED's in Hong Kong office.
- Maintain indoor temperature at 24°C – 26°C in offices.
- Perform maintenance on a regular basis to keep operating efficiency of air conditioning system.

For our China factory – Zhiwei, we have utilized new technology for our air-conditioning system which reduces energy consumption. Please refer to the section – Cleaner Production Program.

Cleaner Production Program

Sterling Group participated in the Cleaner Production Partnership Program launched by Environmental Protection Department of Hong Kong SAR in collaboration with the Economic and Information Commission of Guangzhou Province in 2018. The program aims to drive the adoption of an integrated preventive environmental strategy in manufacturing of products and provision of services to increase efficiency and reduce risks to human beings and environment. Our project commenced in 2019 by applying new technology – COOLNOMIX to air-conditioning system in Zhi Wei (Guangzhou) Garment Manufacturing Company Ltd.

Our air-conditioning system makes use of the room temperature to determine the run-time of the compressor, and most of the time, compressor overruns to achieve the desired temperature. COOLNOMIX Optimized Refrigerant Supply (ORS) system employs data from two installed precise temperature sensors to determine the running time of the air-conditioner's compressor. The first sensor replicates the function of room temperature measurement and is employed by COOLNOMIX ORS to deliver the required room temperature as a priority, and the second sensor is to measure the temperature of the cold-supply air from the air-conditioner. Together they determine when the compressor has completed its hydraulic work of fully compressing the refrigerant gas. Making use of room temperature measurement is to prevent compressor continuing to run when the refrigerant gas is fully compressed. COOLNOMIX ORS is able to stop or slow down the compressor whilst the air-conditioner uses the reservoir of cooling capacity that has been created to cool the room. Finally, increment of the idling time or reduction of running time of compressor produces electricity saving.

12 air-conditioners are installed with individual COOLNOMIX system. The efficiency is different for each air-conditioner due to various factors like the thermal source from production process, room size, humidity, etc. A systemic analysis was done through measurement by individual energy meter on each air conditioner with controlled experiment. The majority of efficiency is over 20% and average electricity saving reaches 25%. This also contributes to carbon footprint mitigation.

Reduce **25%**
Carbon
footprint



Higg Index

The Higg Index is a suite of tools developed by the Sustainable Apparel Coalition that enable facilities and brands to accurately measure and score its environmental or social performance. Sterling Group has adopted Higg facility tools – Facility Environmental Module (FEM) to measure the environmental performance of our factories and improve the transparency for our customers by having the assessment on each facility operations. To a certain extent, adopting Higg Index and utilizing Higg self-assessment questionnaire does not only increase the awareness of sustainability, but also let us easily identify the key areas for improvement across our facilities and drive continuous improvement. What is most important is to shed some light on our sustainability strategy by systemically capturing the environmental data.

We also use Higg Index as industry-side assessment tool to evaluate the environmental performance in our supplier base. It facilitates inculcating an awareness of environmental issues and providing an environmental indicator in supplier's sustainability journey.

Seven sections of FEM V3:

- Environmental Management System
- Energy and Greenhouse Gas Emissions
- Air Emissions
- Water Use
- Wastewater
- Waste Management
- Chemicals Management



Energy Consumption & Greenhouse Gas Emission

Sterling Group is committed to utilizing the resources efficiently in order to reduce environmental impact. The main source of power is purchased electricity for the Group's production facilities which is strictly monitored. In addition, our China's factory utilises natural gas for our boilers. Natural gas is much cleaner energy to use than other fossil fuels and produces less soot, not to speak of the fact that natural gas production is also better for the environment. In terms of greenhouse gas emission, natural gas combustion produces less carbon dioxide with higher efficiency. We embrace a vision of satisfying the desire of every business partner and responding to the latest global trend in sustainability. We have internal environmental policy in place and ensure the low emission and energy saving measures is fully considered in our operational activities. Also, we endeavour to minimize the use of energy through proper maintenance of equipment, improvement of equipment designs & installation and increasing employees' awareness of energy saving habits.

Energy Type	Electricity	Natural Gas	Diesel Oil	Petrol
Consumption	4,485 MWh	137,840 m ³	152,580 liter	20,813 liter
Intensity (per garment)	3.22 kWh	0.09 m ³	0.11 liter	0.02 liter

Greenhouse Gas ("GHG") Emission	Unit	Emission
GHG Emission (Scope 1)	tonnes CO ₂ e	715
GHG Emission (Scope 2)	tonnes CO ₂ e	3,150
Total GHG Emission	tonnes CO ₂ e	3,865
GHG Emission Intensity (per garment)	kgCO ₂ e/pc	2.77

Total
carbon footprint
3,865 tonnes CO₂e

Carbon intensity
2.77 kgCO₂e/garment

Illustrations on environmental data:

1) Greenhouse gas emission (scope 1) mainly comes from the consumption of diesel and natural gas. The energy consumption coefficient refers to the emission factors of IPCC2006 Guideline for National Greenhouse Gas Inventories.

2) Greenhouse gas emission (scope 2) is from electricity purchased from power suppliers. In respect of the greenhouse gas emission factor, "Climate Transparency (2017 Report)" is referred to for electricity consumption in China, whereas Sri Lanka electricity grids refer to "Sri Lanka ODSM – Presidential Task Force on Energy Demand Side Management."

Scope 1: It represents the diesel, natural gas and fuel consumption by stationary and mobile sources.

Scope 2: It represents the electricity purchased from power suppliers.

Water Consumption

The Group does not involve fabric processing or washing, so the amount of water used in production is not significant. In our operation, the main water usage is for domestic use. We provide on-going education to our employees on how to conserve water and ensure maintenance of the water system and equipment to eliminate leakages.

Chiefway Katunayake (Pvt) Ltd. and Zhi Wei (Guangzhou) Garment Manufacturing Company Ltd. are well equipped with metering to monitor water consumption. However, since water is sourced from underground at Chiefway (Pvt) Ltd., the use of meter is not feasible so relevant water usage data is not available.

A graphic consisting of three overlapping light blue water droplets. The text is centered within the droplets in a blue, sans-serif font.

*Total
water consumption:
54,173 m³
Water intensity:
0.048m³ / garment*

Use of Packaging Materials

The packaging materials used in our operation are mainly corrugated carton boxes for garment shipments, tissue paper, plastic bags, hangers and cardboards. Most of the packaging designs are specified by our customers and we have minimal control over the types of materials used for packaging or the packaging method because we need to comply with customers' requirements. We strive to not over-order, have better handling and utilization of materials to reduce wastage. On the other hand, waste materials within facilities are sorted out by categories and collected by designated agent for proper recycling.

Fair Trade USA Factory Program

Fair Trade USA is a non-profit organization and the leading certifier of Fair Trade products in United State. The Fair Trade Certified seal on a product signifies that the product was made according to rigorous Fair Trade standards, which promote sustainable livelihoods and safe working conditions, concern the environment and supply chains transparency. For every Fair Trade Certified product sold, a Fair Trade Premium will be contributed by the retailer and goes into the Community Development Fund at origin. Then the factory’s democratically elected Fair Trade Committee will decide how to spend this fund to improve workers’ lives and collective needs, as well as the needs of the communities and environment.



Sterling Group is honoured to participant in the Fair Trade program partnering with our largest customer, an iconic brand in American fashion apparel. Our two Sri Lanka factories – Chiefway Katunayake (Pvt) Ltd. and Chiefway (Pvt) Ltd. have gone through the comprehensive awareness program, the Fair Trade Committee election and formation, and the certification process by Fair Trade-appointed third-party Conformity Assessment Body. In view of the sustainability of the entire garment supply chain, from fiber ingredient production, through cut and sewn processes until after it leaves consumers’ hands, each party in supply chain plays an integral part in contributing to sustainability. Our two Sri Lanka’s facilities, as Fair Trade certified factories, play a crucial part in the supply chain from the cutting and sewing of fabrics to finishing and packing of final garments. We commit to create sustainable livelihoods, safer working conditions and desperately-needed transparency.



We fully support Fair Trade because we believe Fair Trade is not just a market, but a social movement to bring strength, hope and real choice to the consumers and workers making the products. We see the Fair Trade program ushering a new global business model that helps secure our own profitability and competitiveness while protecting the environment and ensuring a fair return to the workers’ community.



COVID-19 Crisis

Since beginning of year 2020, the world is reeling from the effects of the COVID-19 and the far-reaching consequences of the disease are being felt across the globe. Governments are imposing lockdowns on their citizens and maintaining proper social distance becomes a new norm. Every party in the manufacturing supply chain is suffering from the raw material suppliers to apparel brands. As a garment manufacturer, our group cannot escape the ravages of this devastating pandemic. To cope with COVID-19 at the end of the Chinese New Year Holidays when it first began to spread, our PRC factory made all the necessary precautionary safety measures and became one of the few factories approved for opening in early February. As soon as the factory resumed operations, we also educated employees, provided personal protective equipment and set up a hygiene management system regarding personal hygiene, virus transmission prevention measures and safety procedures. With determined teamwork and early preparations, nearly all our employees return to work with the exception of those from Wuhan area and our productivity soon returned to pre-COVID days.



Solidarity

Although we were all facing an unprecedented health crisis, we believe that the solidarity among our employees is paramount in building morale. The lockdown of Wuhan and its neighboring cities caused a great deal of anxiety to our employees who lived in the areas but were unable to travel to return to work. Our factory management made a deliberate effort to contact each and every one of our employees affected by the lockdown and reassure them of their job security when they return.



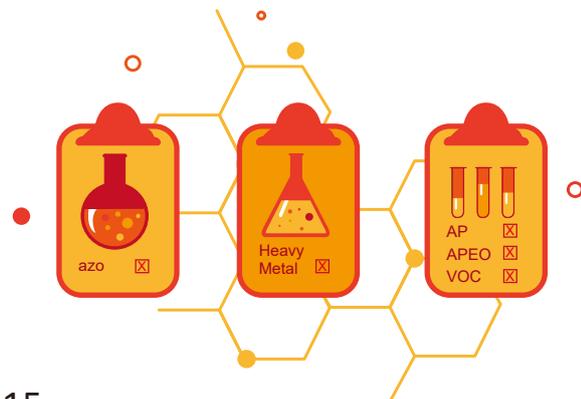
Support Hubei

“Support Hubei” is not a slogan. We believe Hubei residents made an enormous contribution in combating the spread of COVID-19. Our Panyu management team firmly believes that it is our social responsibility to support Hubei workers as much as we can by giving them first priority in our recruitment. We actually ran an advertisement in the local newspaper recruiting Hubei residents. Many of them feared discrimination in the job market because of perceived health risks to other employees, but our Panyu factory gave them a welcome reception when they joined our company.



Chemical Management

Sterling Group is fully aware that hazardous substances in garments are not only harmful to our end customers, but also directly damage our environment. Therefore, we are committed to upholding our product integrity standards, ensuring our materials used and the final garments made comply with the hazardous substances requirements. In order to accomplish our goal, the Group formulated its own Restricted Substances List (RSL) policy and requirements in 2015, which is aligned with AFIRM (Apparel and Footwear International) restricted substances list. The policy makes clear our expectations to materials suppliers in regard to the use of chemicals by adopting RSL which is a list of chemicals restricted in consumer products. It aims to reduce the use of hazardous substances in our final garments and supply chains. Last year, we continue our engagement with our buyer, a British luxury fashion brand, and participated in their P2020 program to strengthen our chemical management with fabric mills by utilizing Manufacturing Restricted Substance List (MRSL) from Zero Discharge of Hazardous Chemical (ZDHC) program to avoid using potentially hazardous substances in its manufacturing processes. This is accomplished by effluent testing against ZDHC standard. At the same time, the Group has designated a key executive to go through the ZDHC Accredited training so as to become a qualified Chemical Manager in P2020 program.



Health and Safety

To ensure our standards in productivity and quality assurance, Sterling Group strives for keeping our factories safe from occupational hazards and work injuries of our employees. The Group maintains a working environment that allows employees to feel valued, fostering high morale among them. Workers are provided with sufficient safety training for their job tasks and high quality safety equipment in their workplace. We aim for zero accidents in our factories and ensure our safety policies adequately protect our employees, the greatest asset in our company.

All of our factories have responsible officers to oversee and manage health and safety issues. Relevant on-site assessment is conducted on a regular basis to ensure the safety of workplace and the safe operation of equipment and machinery.

Number and rate of work-related fatalities	0
Lost man-days due to work injury	114

Training and Development

Solid technical skills and good quality products are two of the key success factors in our business. To attain sustainability and continuous improvement, the Group constantly invests in enhancing employee performance, increasing motivation and productivity and upgrading new production skill through on-the-job training, external training and internal skill exchange group.

This year, we trained certain dedicated production staff and office staff to utilize ET software and iGarment system to enhance the production and operation efficiency. In addition, regular training in regard to the health and safety, fire safety, chemical handling or CTPAT, etc. are scheduled throughout the year.



Total hours
Training 6000
More than

Labour Practice

The Group is devoted to providing an environment and atmosphere that promote high ethical standards, equality, transparency and respect for each other. Our code of conduct and corporate values empower our employees to recognize human rights, freedom of association to protect their interests, and denounce child and forced labour. We have established a robust hiring system to prevent child labour; the most important of which is building awareness and advocacy in our Group and those in position of decision-making to prevent child and forced labour, particularly through education.

Another core element in our social management system is that no discrimination is allowed against race, age, gender or sexual orientation. Wages & benefits and working hours are in strict compliance with local labour laws and our brand customers' requirement. The Group does not encounter any non-compliance with relevant laws and regulation during the reporting period.

WRAP Accreditation

Worldwide Responsible Accredited Production (WRAP) is an independent, non-profit organization dedicated to promoting corporate social responsible (CSR) standards in all factories around the world. Our Sri Lanka factories, Chiefway Katunayake (Pvt) Ltd. and Chiefway (Pvt) Ltd. have engaged with WRAP program since a number of years ago and are accredited with the Gold rating, which means we are in compliance with WRAP's 12 important principles based on generally accepted international workplace regulations including the spirit or language of relevant conventions of the International Labour Organization (ILO), the principles encompassing human resources management, health & safety, environmental practise and legal compliance including import / export and customs compliance and security standards.



SMETA

Sedex Members Ethical Trade Audit (SMETA) is one of the most widely used ethical audit formats which combines the best practices in the field of corporate social responsibility. It focuses as much on labour conditions and occupational safety as on environmental standards and ethical business practices. Our PRC factory, Zhi Wei (Guangzhou) Garment Manufacturing Co., Ltd. has engaged with SMETA by collaborating with third-party audit and aims to drive substantial improvements in ethical and responsible business practices. Our audit result is uploaded to Sedex (Supplier Ethical Data Exchange) which is a widely recognized online platform for information sharing about social and ethical performance, for our UK buyer.

Employee Relations

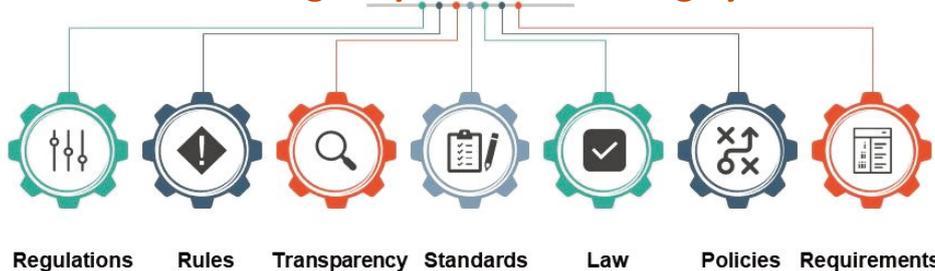
To establish good rapport in the Group, we understand the importance of work-life balance and show sincere appreciation to our employees because they are the key in achieving the Group's goals. Therefore, as one of the employee bonding activities, we hold annual dinners and picnics to increase the sense of belonging and togetherness in the company.



Supply Chain Management

Sterling Group as one of the key OEM manufacturers in local apparel industry, we supply to a number of reputable and luxury brands in the U.S. and UK. Supply chain management is vital in managing our partner factories and ensuring their continued qualification. In order to achieve this goal, we have formulated a robust Responsible Sourcing system with Sterling's code of conduct to standardize our requirements and establish the Group's internal assessment framework to evaluate the level of capability and performance as our suppliers. Sterling Group possesses a designated Compliance team to manage the Responsible Sourcing system and execute the standardised procedures to cover the entire supplier base including new supplier on-boarding, on-site assessment and gap analysis, capacity building for continuous improvement and remedial program. Every supplier needs to live up to our Code of Conduct which specifies the requirement to follow all applicable laws and regulations, eradicate child labour and forced labour, promote fair employment practices, provide safe workplace, concern for the environment and imminent health & safety threat.

Sterling Responsible Sourcing System



All suppliers need to undergo an on-site assessment conducted by Sterling's Compliance team prior to confirming the business relationship with us. At the same time, production capability, costing and product management system are also under evaluation by corresponding departments. In order to work closely with our suppliers and ensure quality deliverable, we position our Quality Control team at each factory to do in-line monitoring of quality during production and perform final inspection before delivery.

Product Responsibility

The Group places a high priority and awareness on product quality and safety. This is an area where we put considerable effort to meet and exceed our customers' expectations. In term of the product safety, most of the raw materials are nominated by our customers. All materials and products need to pass a strict compliance process and are subject to testing in accordance with stipulated specifications. In addition, with the Quality Management System framework provided by the Group and aligned with customers' requirement, the Quality Assurance team implement the processes, methodologies and standards to ensure that good quality products, safe products and services are delivered to the customers. The Group has kept completed serialized records and samples of the products to make sure that they are traceable in case there is any product recall.

The Group respects and protects our customers' intellectual property. We have systematic measures and handling procedures in our production facilities to maintain strict control over customer's licensed materials, including but not limited to secure storage of licensed materials and accountability for the issued materials at the end of each shift. For the personal and trade information with customers, the Group controls access to such information, and ensure those who possess such information know the importance of confidentiality and privacy. Unauthorised disclosure of such information may be a breach of the Company's employment contract. There is no product recall cases and non-compliance issues with any laws and regulations due to product responsibility and data privacy-related matters during the reporting period.

Anti-Corruption

Integrity is one of the core values of the Group. We manage our business with a high level of integrity and a heightened awareness of proper behaviours to prevent corruption through strengthening the management control process, systems and procedures and periodic review of departmental internal controls.

A clear code of conduct against corruption is stated in the employee handbook of our Group. Our anti-corruption policy stipulates clearly that no employee may solicit or accept personal benefits from any party involved in all business transactions conducted with or on behalf of the Group. We do not tolerate any form of corruption and take the most serious view of any attempt to commit corrupt practices. Any cases of suspected corruption will be properly investigated and appropriate action taken including reporting to the appropriate authorities, disciplinary action, prosecution and active pursuit of recovery.

A mechanism is in place for every employee to speak up against suspected acts of bribery or corrupt practices. We do not have any litigation or allegation of corruption in the reporting period.

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