

Stock Code 股份代號: 251

# 與時創建 Building with the times





環境、社會及管治報告 Environmental, Social and Governance Report

# CONTENTS





## **About the Group**

Headquartered in Hong Kong, SEA Group is a leading international property conglomerate. The main business operations of the Group include property investment, property development, financial investment and hotel operation. Over the years, the Group has more than 200 residential, commercial and industrial projects in Hong Kong, United Kingdom, Australia, New Zealand, Canada, Mainland China and other countries.



1 Shouson Hill Road East, Hong Kong



Crowne Plaza Hong Kong Causeway Bay, Hong Kong

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33 Old Broad Street, London



Rendering, Grand Victoria, Hong Kong

During the reporting year of 2020, the Group focused on business activities comprising property investment, property development, hotel operation and financial investment. Besides the hotel operation of Crowne Plaza Hotel, the Group's core projects mainly consist of a residential project in Hong Kong (No. 1 Shouson Hill Road East), an investment property in Hong Kong (a portion of Winway Building) and a joint venture residential development project "Grand Victoria" at West Kowloon Waterfront in Hong Kong, two investment properties in London, the United Kingdom (20 Moorgate and 33 Old Broad Street) and an investment property in Australia (Lizard Island).



# **About the Report**

This is the fifth ESG report published by the Group. In order to provide a better understanding of the Group's ESG performance for the reporting year from 1 January 2020 to 31 December 2020, this report outlines the Group's strategy towards sustainability practices and performances related to ESG aspects. This report is prepared in both Chinese and English and has been uploaded to the websites of the Company (www.seagroup.com.hk) and the Stock Exchange (www.hkex.com.hk).

#### **Reporting Boundary**

Aligned with previous reports, this report focuses on the Group's core business of hotel operations at the Crowne Plaza Hotel as well as property investment and financial investment businesses operated by the Head Office, which accounts for 100% of the Group's revenue of the reporting year.

#### **Reporting Standard and Principles**

As prepared in accordance with the ESG Reporting Guide contained in Appendix 27 to the Rules Governing the Listing of Securities on the Stock Exchange, this report adheres to the four fundamental reporting principles. A complete index is inserted in the last chapter of the report on pages 28 to 30 for reference.

## **Reporting Principles**



#### **Confirmation and Approval**

It is the Group's role to ensure the information disclosed in the report is accurate and reliable. Information contained herein was sourced from statistical data and content of official documents from SEA. Internal controls and a formal review process have been established in accordance with the Group's policies. This report was approved by the Board.

#### **Feedback Mechanism**

S E A HOLDINGS LIMITED

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The Group values the opinions and suggestions of its stakeholders. All stakeholders are welcome to share their views to help strengthen SEA's future ESG performance through the channels below:

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# **Chairman's Message**



During the reporting year, the global outbreak of the COVID-19 pandemic has been unprecedented and brought devastating impacts on people's livelihoods, where vulnerable communities are being impacted the most. At the same time, stakeholders are increasingly expecting businesses to strengthen their sustainability approach, where ESG factors should be taken into account in core decision-making when conducting businesses. In light of these, the Group believes the importance of developing a systematic sustainability approach, where it will be able to contribute to long term sustainable development and build resilience across its operations.

The Group understands the importance of sustainability governance, as it forms the backbone of its sustainability management approach. The Board has the responsibility in overseeing ESG issues, including risks and opportunities. With the support from the management across the Group, SEA will be able to continue to develop its sustainability strategy to guide its business operations. In the near future, to strengthen its sustainability approach, the Group will consider engaging its key stakeholders through an online survey to gauge their feedback on relevant ESG issues.

Facing the challenges brought by the COVID-19 pandemic, the Group appreciates the effort and support of its stakeholders, especially its employees, customers and business partners. Without their contribution, the Group will not be able to have achieved its performance. The Group will continue to work together with its stakeholders and to communicate with them on an ongoing basis in order to meet their needs and expectations.

Moving forward, the Group will walk hand-in-hand with its stakeholders to bring them along with it throughout the sustainability journey.

Lu Wing Chi, Jesse Chairman 22 July 2021, Hong Kong

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ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT 2020

# **Sustainability Approach**

#### **Governance Structure and Sustainability Risk Management**

Sound corporate governance forms the backbone of SEA's business. It is the Board's responsibility in overseeing ESG issues that are related to the Group's operations and the overall ESG management approach. The Board understands that potential ESG impacts can affect the Group's operations and will guide the Group in addressing the ESG risks and opportunities. The Board evaluates and determines the Group's ESG risks with the support from the management across the Group and ensures that appropriate enterprise risk management and internal control system are in place.

Looking ahead, the Group will continue to implement more group-wide initiatives in order to address different ESG issues.

#### **Compliance Management**

As a responsible corporate citizen, it is the Group's duty to uphold the highest standard of business integrity. The Group has effective compliance management in order to reduce its exposure to regulatory risks. SEA understands that violations of laws and regulations can cause significant impacts on its operations, financial position and reputation. Therefore, policies and monitoring measures are implemented to ensure the Group's operations comply with relevant laws and regulations. The Group also requires its employees to stay abreast of the latest regulatory development.

Aspect	Relevant laws and regulations
Emissions	Air Pollution Control Ordinance (Hong Kong Law, Cap. 311)
	Waste Disposal Ordinance (Hong Kong Law, Cap. 354)
	Water Pollution Control Ordinance (Hong Kong Law, Cap. 358)
Employment	Employment Ordinance (Hong Kong Law, Cap. 57)
Health and Safety	Occupational Safety and Health Ordinance (Hong Kong Law, Cap. 509)
Labour Standards	Employment Ordinance (Hong Kong Law, Cap. 57)
Product Responsibility	Personal Data (Privacy) Ordinance (Hong Kong Law, Cap. 486)
Anti-corruption	Prevention of Bribery Ordinance (Hong Kong Law, Cap. 201)

During the reporting year, there was no reported incident of material non-compliance with the relevant laws and regulations regarding emissions, employment, health and safety, labour standards, product responsibility and anti-corruption that had a significant impact on the Group's business. In addition, SEA was not aware of any new laws and regulations with a significant impact on the Group's operations.

#### **Stakeholder Engagement**

SEA attaches great importance to its stakeholders' opinions. Their standpoint allows the Group to continuously improve on its sustainability performance. The Group conducts an ongoing dialogue with its stakeholders regularly through various communication channels. These engagements ensure that the implementation of the Group's sustainability measures remains effective across its operations.

Key Stakeholders	Why Engage?	Forms of Engagement
Employees	It is crucial to recognise employees' concern to promote an inclusive culture and provide a healthy working environment.	<ul> <li>Orientation and training sessions</li> <li>Performance appraisal</li> <li>Health talks</li> </ul>
Customers	Fulfilling customers' demand and expectation are key to the Group's success.	<ul> <li>Online survey</li> <li>Comment card</li> <li>Customer service hotline</li> <li>Email and mobile application</li> <li>Company website</li> </ul>
Shareholders	The Group values the opinions and feedbacks from its shareholders.	<ul> <li>Annual general meeting</li> <li>Annual report, interim report, ESG report</li> <li>Company website</li> </ul>
Vendors and Suppliers	By working closely with its business partners, SEA will be able to monitor their quality and performance to ensure high quality products and services are delivered.	<ul> <li>Tendering and procurement processes</li> <li>Presentations and interviews</li> <li>Briefings and meetings</li> <li>Emails and phone calls</li> </ul>
Communities	The Group acknowledges the importance to understand the needs of local communities in order to create long-term benefits for the society.	<ul> <li>Community events</li> <li>Volunteering activities</li> <li>Donations and sponsorships</li> </ul>

#### **Materiality Assessment**

During the reporting year, the Group commissioned an independent consultant to conduct a survey with members of the Board, gauging the relative importance of the ESG issues and identifying the material issues for its operations. Through the review of past engagement results as well as industry trends, SEA has identified 12 sustainability issues, covering environmental, employment, operating practices and community investment. The materiality of each relevant issue was assessed by taking into account its importance to the Board members as well as the Group's impacts (both positive and negative) concerning the issue.





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# **Our People**

The Group values each and every one of its employees and is dedicated to supporting their career development, protecting their rights, and fostering a healthy and safe workplace. During the reporting year, the Group received various awards related to its effort in promoting a happy and healthy workplace.

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## Awards of SEA:

- Caring Company 2020
- Happy Company 2020
- Good Employer Charter 2020
- Good MPF Employer 2020: "Good MPF Employer" "MPF Support Award"

# Awards of Crowne Plaza Hotel include:

Caring Company: 10 Year Plus Caring Company (2010 – 2020 Award)



	Crowne Plaza Hong Kong Causeway Bay
S E A HOLDINGS LIMITED 爪哇按股有限公司	香港銅鐵灣皇冠假日酒店
caring <b>company</b>	Caringcompany
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#### **Development and Training**

The Group recognises that in order to build a competent workforce, it is crucial to invest in employees' development and training. As stated in the employee handbook, the Group will provide professional growth and work-related training in order for employees to be equipped with skills to carry out their job duties as well as be able to achieve their career goals.

To support the continuous development of employees, an annual performance appraisal is conducted for employees at both the Head Office and the Crowne Plaza Hotel. During the performance appraisal, department heads assess employees' performance and their training needs. The Human Resource Department will then plan, allocate resources and execute relevant training programmes across different departments. These learning opportunities include in-house training, recreation and team building activities. Additionally, the Group supports employees who seek professional enhancement outside working hours. For employees who pursue further study for job-related courses, the Group will subsidise up to 80 percent of their course fees and will grant with up to three calendar days of full-pay leave per calendar year for their first sittings of the examination.

Due to the restriction posed by the COVID-19 pandemic, some of the training courses at the Head Office and the Crowne Plaza Hotel that involve various departments were suspended. During the reporting year, the Crowne Plaza Hotel provided departmental training, including personal use of social media, handling personal data policy, information security, anti-corruption and handling of contagious coronavirus. Looking ahead, the Group will continue to provide courses that meet employees' training needs.



Hotel Training

#### Employment

The Group strives to provide a fair, respectful and inclusive work culture. According to the relevant employee handbooks, different aspects of employment, including but not limited to compensation and dismissal, recruitment and promotion, working hours, rest periods, equal opportunity, diversity and anti-discrimination, and other benefits and welfare, are clearly stated.



Service Award in 2020



Service Award in 2020

#### **Responsible Employment Practices**

Competitive remuneration and benefit package are provided to employees in order to acquire and retain talents. SEA's remuneration package is based on total remuneration, including basic salary, discretionary bonus and a voluntary contribution to the retirement fund. Besides employees' holidays, such as annual leave, SEA also offers attractive benefits such as life and medical benefit for employees and their eligible dependents after probation, long service recognition award and study fund. Promotion opportunities will be based on merit such as competence and potential performance and quality of work, etc.

The Group respects human rights. Child labour and forced labour are prohibited in SEA's operations. Before the recruitment of a candidate, a comprehensive inspection of the job applicant's identity is conducted to ensure he or she reaches the minimum working age.

The Group believes that work-life balance plays a crucial role in promoting a positive working environment. Employees are encouraged to complete their tasks within office or working hours instead of working overtime. In cases that employees are requested to work outside normal working hours, overtime compensation and meal allowance shall be provided as a special arrangement on overwork.

#### **Diversity and Equal Opportunities in the Workplace**

SEA believes that a diverse workforce is important to the operations of its business. As mentioned in the CSR Policy Statement, the Group endeavours to treat all employees with respect and deliver fair employment. SEA also fosters equal opportunities in the workplace and ensures all employees are treated fairly and equally. Employees shall not be discriminated against based on a range of diverse perspectives, including cultural and educational background, experience, skills, knowledge, age and gender. Also, potential candidates are selected based on their merits and abilities to meet the requirements of the job.

In addition, it is the Group's responsibility to provide a harassment-free working environment to its employees. Employees facing any discrimination on gender, marital status, colour, religion, race, nationality, ethnic origins, disability and age in all aspects of employment shall report to management.





Crowne Plaza Hong Kong Causeway Bay, Hong Kong

#### **Health and Safety**

Employees' health and safety are the prime concern of the Group. SEA is devoted to providing a healthy and safe workplace for all its employees. As mentioned in the Group's CSR Policy Statement, it monitors health and safety issues arising in the workplace. Guidelines from the Occupational Safety and Health Council as well as the Labour Department are referenced when articulating safety practices, including the use of equipment, hygiene, first aid and fire precaution. The Group also provides health insurance which covers outpatient services and hospital expenses to all employees.

The Group arranged free on-site flu vaccinations for its Head Office employees. Due to the COVID-19 pandemic, the Group did not arrange health talk during the reporting year.

The Crowne Plaza Hotel has adopted safety-related policies covering Workshop Safety, Working at Height, Electrical Safety, Welding and Cutting and Pressure System in order to raise safety awareness among employees. Besides, a staff welfare committee, comprised of departmental representatives, is also in place and holds monthly meetings to discuss staff's safety issues. To minimise health and safety risks, periodical preventive measures such as safety inspection and testing of electrical equipment have been implemented. Additionally, safety training, such as Fire and Bomb General Orientation, were also provided to hotel staff to ensure better preparation and response during emergencies. Legionella control has also been put in place to minimise the spread of Legionella pneumophila and the associated risk of the disease.

During the reporting year, the Group continued to have no fatalities cases reported. There were 9 cases of work-related injuries at the Crowne Plaza Hotel. These injuries ranged from cuts, bruises and sprains. To prevent the same accidents from happening again, the Crowne Plaza Hotel provides tools and equipment such as work platform or trolleys as well as health and safety training to its employees.

Work related fatality and/or injury					
Locations	Head Office	Crowne Plaza Hotel			
Number of work-related fatalities	0	0			
Number of work-related injuries	0	9			
Work-related injury rate (per 100 workforce)	0%	8.18%			
Number of lost days due to work injury	0	237 days			

#### Measures in responding to the COVID-19 pandemic

In 2020, people around the world have been affected by the COVID-19 pandemic. Protecting the health of its employees is the Group's top priority. To reduce the spread of the disease, we implemented the below measures in line with Hong Kong government's virus control guidelines.

#### **Head Office**

- Distributed face masks and disinfecting hand sanitisers to all staff
- Installed infrared thermometers to check staff's body temperature
- Offered special working arrangements including flexible office and lunch hours to avoid crowds during peak hours and also allowed staff to work from home
- Disinfected office areas more frequently and regularly
- Required employees who have symptoms of COVID-19 such as fever, malaise, dry cough and shortness of breath should at once notify the Company, seek medical advice, do a coronavirus test and stay home
- Encouraged employees to receive free COVID-19 testing in response to the Universal Community Testing Programme launched by the government in September 2020 for early detection and controlling virus transmission

#### **Crowne Plaza Hotel**

- Provided a wide range of anti-epidemic items such as surgical masks, hand sanitisers and disinfectant spray to hotel staff
- Provided personal protective equipment such as gloves, facial shields and disposable protective gowns to staff who are carrying out high risk operations
- Required all operational employees to conduct COVID-19 test provided by the Crowne Plaza Hotel
- Strengthened the frequency of cleaning and disinfection works in its ventilation system and public amenities
- Required all personnel to conduct body temperature check and wear surgical masks when entering into hotel premises
- Provided hand sanitisers in common areas
- Hung up posters and notices to remind employees and guests of the importance of maintaining personal hygiene and keeping social distance





Measures for COVID-19 at Crowne Plaza Hotel

# **Our Operations**

As a responsible corporate citizen, it is the Group's duty in maintaining the highest possible standards when delivering its products and services. As stated in the CSR Policy Statement, the Group is committed to promoting good business ethics, integrity and accountability in doing business. By upholding business ethical standards and requiring its suppliers to do the same, SEA will be able to conduct business responsibly and deliver high quality products and services to its customers, thereby earning the trust of all its stakeholders.

#### **Anti-corruption**

The Group is committed to upholding integrity and promoting fairness in the society. Therefore, any forms of corruption, bribery, extortion, fraud and money-laundering activities are strictly prohibited. As stated in the Group's anti-corruption policies, directors and employees shall adhere to the provisions of the Prevention of Bribery Ordinance. SEA prohibits all its members from offering and soliciting all forms of benefits from any third parties, such as suppliers or business partners. Employees shall seek approval in advance when unsolicited gifts are accepted or offered. They are also required to follow the procedures when accepting or donating the gift.

At the Crowne Plaza Hotel, it has put in place various internal control measures to prevent corruption and bribery. The Crowne Plaza Hotel has adopted a Code of Conduct, where it contains terms on anticorruption and appropriate handling procedures when faced with these circumstances. Staff at the Crowne Plaza Hotel are required to sign the Code of Conduct as well as the anti-corruption policy. Additionally, a confidential hotline is also in place in the Crowne Plaza Hotel to assure fair reporting and handling of grievance procedures-related complaints. This hotline is a platform for employees to raise concerns over any misconducts or malpractices within the workplace. Cases reported will be handled by a third party to ensure whistle-blowers stay anonymous, hence, protecting them from harassments and reprisals.

During the reporting year, the Group invited Hong Kong Independent Commission Against Corruption ("ICAC") to give training to SEA's employees. The training aims to enhance employees' knowledge on anticorruption legislation as well as necessary skills to handle ethical dilemmas at the workplace that are relevant to the Head Office as well as the Crowne Plaza Hotel operations. For the management level, the training also included topics on staff's integrity management. A total of 14 and 31 employees from the Head Office and the Crowne Plaza Hotel attended the training respectively.

In the future, the Group will continue to provide anti-corruption training to employees as well as board members to foster integrity when doing businesses.



ICAC Talk



#### **Product Responsibility**

SEA considers products and services quality as one of its key components to success for building trust with its stakeholders. The Group has put in place relevant policies in order to ensure high quality products and services are being delivered.

#### Awards of Crowne Plaza Hotel include:

- Booking.com: Traveler Review Awards 2020
  - Hotels.com: Loved by Guests Award 2020
- TripAdvisor: Travelers' Choice 2020



#### **Customer's Data Protection**

Customers' data privacy is of the utmost importance to the Group. According to the Group's Privacy Policy, proper security controls are in place to ensure customers' sensitive information is handled with the greatest care. Training on handling personal data and credit cards is compulsory for the Crowne Plaza Hotel's frontline employees. To obtain the acknowledgement of its guests, a privacy policy statement or personal information collection disclaimer is presented to customers upon the collection of personal data, informing customers that information will be collected.

#### **Customer's Health and Safety**

As stated in the Group's CSR Policy Statement, the Group adheres to standards of product safety in accordance with relevant rules and regulations to secure customers' safety.

The Crowne Plaza Hotel has the responsibility to ensure every stay at the hotel is safe and comfortable. The ventilation system is monitored regularly to ensure air circulation and humidity are controlled at a comfortable level and free of harmful pollutants.



To ensure all guests' health and safety on its premise, the Crowne Plaza Hotel has established a series of guidelines and procedures for staff to follow in response to the COVID-19 pandemic.

The Crowne Plaza Hotel has carried out procedures and actions for each department. A detailed guideline on the cleanliness, such as procedures for cleaning and disinfection, of each key touchpoint, including pre-arrival, check-in, in-stay and departure, was also developed. In situations where suspect cases are found, relevant procedures are also in place to limit the spread of the disease. Additionally, the Front Office Manager shall assign a designated floor within the hotel for suspect cases.

#### **Crowne Plaza Hotel has implemented the below measures at its restaurants:**

Displayed "Leave Home Safe" QR Code at all restaurants	Provided hand sanitisers for guests	Conducted temperature check for guests before entering the restaurant	Set partition between tables
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Food safety in the hospitality industry is of particular importance since hazard related to food and its risks can affect the health of guests. Therefore, the Crowne Plaza Hotel adheres to standards of product safety under the relevant rules and regulations to ensure that its guests' health and safety are the top priority. A set of standards and guidelines, such as the Food Safety Management System, has been put in place to ensure all food is safe for consumption. The Food Safety Management System, which includes its premises, vendors and suppliers, covers material purchasing, food processing, handling and packaging, ensuring food hygiene is maintained to the highest level.



Sushi Ikkon at Crowne Plaza Hong Kong Causeway Bay, Hong Kong

The Crowne Plaza Hotel has a responsive mechanism in place in order to respond to guest complaints and food alerts. To ensure that the food it serves has the best quality, the Crowne Plaza Hotel conducts a mass foodborne illness and food recall exercise involving food handling and inspection procedures annually. This exercise will enable employees to be familiarised with emergency scenarios concerning food contaminations, reducing negative consequences once discovered.

During the reporting year, the Group has not received any complaints regarding its services.

#### Advertising

The Group prohibits all forms of deceptive statements in campaigns or marketing content. At the Crowne Plaza Hotel, campaigns are managed by the appointed advertising executive and General Manager and in accordance with overseas, regional and local media guidelines. The Group's operations do not involve labelling matters.

#### **Supply Chain Management**

The Group acknowledges its responsibility in managing ESG risks along its supply chain and treasures the long-term relationships with its suppliers. The Group will continuously minimise ESG risks while promoting corporate values by selecting suppliers with established social and environmental measures. For instance, at the Head Office, printing service suppliers for corporate communication are required to use Forest Stewardship Council certified papers.

At the Crowne Plaza Hotel, a supplier code of conduct was in place to ensure all its suppliers adhere to the highest standards of environmental and social conduct and to abide by all relevant local and national laws and regulations. Suppliers have to demonstrate continuous improvements in their overall sustainability performance, such as green certificated seafood and copying paper with a green certificate. The Procurement Department requires all suppliers to acknowledge the supplier code of conduct and comply with the mandatory provisions. In addition to that, high-risk supplier categories may undergo a specialised hygiene audit to ensure the highest quality products or services are delivered. The Crowne Plaza Hotel has the right to discontinue the business relationship with the supplier if it is found to be in non-compliance with the mandatory elements of the supplier code of conduct. Through the demonstration of good ESG practices, suppliers will be able to earn the preferred supplier status.



Sushi Ikkon at Crowne Plaza Hong Kong Causeway Bay, Hong Kong



## **Our Environment**

SEA attaches great importance to the environment and seeks to manage its environmental footprint. As stated in the Group's CSR Policy Statement, the Group is committed to reducing its environmental impacts, including emissions, use of resources, and the environment and natural resources. These efforts are in the interests of the Group's business operations as well as its stakeholders. SEA's ongoing improvement on the environmental management approach and measures will increase the environmental awareness of employees and the promotion of environmental protection along its supply chain.

#### **Emissions**

The Group is committed to reducing any emissions from its operations and implements various measures to reduce air and GHG emissions as well as waste generation.

#### **Greenhouse gas emissions**

The Group engaged an independent consultant, Carbon Care Asia, to gain a better understanding and evaluate its GHG emissions on an annual basis. This assessment was conducted following the Guideline<sup>1</sup> established by the Environmental Protection Department and EMSD of Hong Kong. It also referenced international standards such as the ISO 14064 standard and the GHG Protocol.



Rendering, Grand Victoria, Hong Kong

20 Moorgate, London

Guidelines to Account for and Report on Greenhouse Gas Emissions and Removals for Buildings (Commercial, Residential or Institutional Purposes) in Hong Kong.



GHG Emissions					
Scope	<b>2020 Emissions</b> (tonnes CO <sub>2</sub> -e)		<b>2019 Emissions</b> (tonnes CO <sub>2</sub> -e)		
эсоре	Head Office	Crowne Plaza Hotel	Head Office	Crowne Plaza Hotel	
Scope 1: Direct GHG Emissions <sup>2</sup>	44.3	54.1	51.9	141.0	
Scope 1. Direct Grid Linissions	98	3.4	192.9		
Scope 2: Energy Indirect GHG Emissions <sup>3</sup>	82.0	3,750.3	91.9	4,947.1	
Scope 2. Energy maneet and Emissions	3,832.3		5,039.0		
Scope 3: Other Indirect GHG Emissions <sup>4</sup>	22.2	14.1	23.5	53.7	
scope 5. Other mullect GHG Emissions	36.3		77.2		
Subtotal GHG emissions by entities	148.5	3,818.5	167.3	5,141.8	
Total GHG Emissions	3,967.0		5,309.1		
<b>GHG Emissions Intensity</b> (by number of employees and revenue respectively)	<b>3.3</b> (per employee)	<b>84.0</b> (per HKD million)⁵	<b>3.3</b> (per employee)	<b>26.5</b> (per HKD million)	

During the reporting year, the total GHG emissions from the Head Office and Crowne Plaza Hotel were 3,967.0 tonnes  $CO_2$ -e, in which 96.3% of emissions came from Crowne Plaza Hotel. The COVID-19 pandemic and social distancing measures have led to a decrease in business activities. As a result, GHG emissions in 2020 decreased by 25.3% compared to the previous reporting year.

#### **Air emissions**

The Group's main air emissions came from the use of fossil fuels in its vehicles. These air emissions include NOx, SOx and RSP.

Air Emissions					
	2020 Emissions (kg)		2019 Emissions (kg)		
Air Pollutants	Head Office	Crowne Plaza Hotel	Head Office	Crowne Plaza Hotel <sup>6</sup>	
NOx	9.25	4.48	10.99	10.84	
NOX	13.73		21.83		
SOx	0.25	0.04	0.29	0.08	
30%	0.	29	0.	37	
RSP <sup>7</sup>	0.68	0.05	0.81	0.05	
кэг Г	0.	73	0.	86	

As seen from the table above, during the reporting year, the amount of NOx, SOx and RSP decreased by 37.1%, 21.6% and 15.1% respectively, compared to the previous reporting year due to the decrease in business activities, where the use of vehicles had been reduced.

- <sup>2</sup> Scope 1 includes direct emissions from the combustion of fossil fuels in stationary sources and mobile sources.
- <sup>3</sup> Scope 2 includes energy indirect emissions by electricity purchased from power companies and gas purchased from Towngas.
- <sup>4</sup> Scope 3 includes other indirect emissions by methane gas generation at the landfills in Hong Kong due to disposal of paper waste, fresh water processing, sewage processing and business travel by employees.
- <sup>5</sup> The increase in GHG emissions intensity was due to the decrease in revenue which is higher than GHG emissions resulted from the COVID-19 pandemic.
- <sup>6</sup> Figures of NOx and SOx emissions of the Crowne Plaza Hotel in 2019 were restated as the amount of LPG used by Crowne Plaza Hotel in 2019 was subsequently updated/clarified.
- <sup>7</sup> Since gaseous fuel consumption is not a significant source of RSP emissions, the figures of RSP do not include Towngas and LPG combustion in hotel operations.

#### Waste Management

The Group acknowledges proper waste handling is key to waste management. SEA encourages employees to reduce, reuse, recycle and repair before disposal.

The Group understands the importance of reducing waste production and promotes recycling across its operations. Therefore, at the Head Office, waste electrical and electronic equipment such as computers, printers and photocopiers, were sent to recyclers for processing. Used ink and toner cartridges were returned to service providers to minimise negative impacts on the environment. The Head Office also encourages the recycling of papers, plastic bottles, stationery and office equipment.



Guided by the waste management hierarchy, the Crowne Plaza Hotel has also implemented several measures to reduce waste generation. Drop off points of recyclable items such as cardboards, newspapers, office papers, glasses, metal, plastic, aluminium cans and cooking oil and grease are established in different areas of the Crowne Plaza Hotel.

For hazardous waste, the Crowne Plaza Hotel has a set of measures intended for the proper handling of hazardous waste. Annual audit of hazardous materials and regular checks of the storage areas are conducted. The Crowne Plaza Hotel also appoints professional companies or original suppliers to collect or prepare waste for shipment to an approved hazardous waste disposal facility. Besides, to ensure the efficiency of waste management, the Crowne Plaza Hotel also conducted waste stream audits and created a waste tracking system, ensuring the transparency of the process to guests. Further, given the alarming figures of plastic in the ocean, since December 2018, the Crowne Plaza Hotel has replaced plastic drinking straws with BIO-POT straws, which are entirely bio-degradable in landfills, aiming to reduce negative environmental impacts.

Waste					
Amount (tonnes)	2020		2019		
Hazardous waste	Head Office	Crowne Plaza Hotel	Head Office	Crowne Plaza Hotel	
Total bazardous waste produced	0.08	1.79	0.03	Not recorded <sup>8</sup>	
Total hazardous waste produced	1.	87	0.	03	
Hazardous waste intensity (by number of employees and revenue respectively)	0.002 (per employee)	0.04 (per HKD million)	0.0006 (per employee)	_	
Non-hazardous waste	Head Office	Crowne Plaza Hotel	Head Office	Crowne Plaza Hotel	
Total non hazardaus wasta produced	12.0	220.1	13.0	320.0 <sup>9</sup>	
Total non-hazardous waste produced	23	2.1	33	3.0	
Non-hazardous waste intensity (by number of employees and revenue respectively)	0.27 (per employee)	4.84 (per HKD million) <sup>10</sup>	0.26 (per employee)	1.65 (per HKD million)	

Striving to monitor its environmental performance, the Crowne Plaza Hotel has improved its data collection system regarding hazardous waste and was able to record the amount of hazardous waste generated during the reporting year. For non-hazardous waste, the amount reduced by 30.3% in 2020 due to the decrease in business activities resulted from the COVID-19 pandemic.

<sup>8</sup> Data for hazardous waste was not available for the Crowne Plaza Hotel in 2019.

<sup>9</sup> The amount of non-hazardous waste has been restated upon the validation of internal record.

<sup>10</sup> The increase in non-hazardous waste intensity was due to the decrease in revenue which is higher than non-hazardous waste generated resulted from the COVID-19 pandemic.

#### **Use of Resources**

The Group operates its businesses to meet stakeholders' needs and is also committed to reducing its environmental footprint. Therefore, SEA strives to limit the consumption of resources and preserve natural resources whenever possible.

#### **Energy management**

The consumption of energy is one of the major sources of resource usage from the Group's operations, of which the use of electricity contributes the most to GHG emissions. The Group is dedicated to raising staff's energy-saving awareness and regularly reminds them to switch off unnecessary lighting and electronic devices when not in use.

At the Head Office, all copiers, printers and other electronic equipment have been set to eco-friendly options by default. Energy-saving modes are also being enabled after a long period of inactivity. LED lighting and indoor temperature control are in place to minimise energy consumption.



With the aim to increase energy efficiency, the Engineering Division of the Crowne Plaza Hotel implemented the energy monitoring system, enabling the assessment and monitoring of energy consumption behaviour within its operation. The assessment allows the Crowne Plaza Hotel to conduct a review regularly for improvement. Additionally, to further improve its energy efficiency, the Crowne Plaza Hotel implements energy management practices and procedures in different areas, such as lighting, cooling, heating, ventilation and air conditioning distribution, domestic water, refrigeration and power distribution to meet requirements set out by the Building Energy Code issued by the EMSD. Besides, with the intention to further raise employees' awareness of energy consumption, the Crowne Plaza Hotel communicates energy management best practices in the administration area to staff and encourages them to practice green measures.

Energy Consumption					
	2020		2019		
Energy Type	Head Office	Crowne Plaza Hotel	Head Office	Crowne Plaza Hotel	
Direct energy consumption (MWh)					
Direct energy consumption	43	2.8	90	7.1	
Towngas	N/A	266.2	N/A	695.1	
Towngas	26	6.2	69	5.1	
LPG	N/A	0.4	N/A	7.5	
ErG	0	.4	7	.5	
Petrol	133.0	10.6	147.2	21.1	
retroi	143.6		168.3		
Diesel	22.6	N/A	36.2	N/A	
Diesei	22.6		36.2		
Indirect energy consumption (MWh)					
Indirect energy consumption	5,40	00.6	6,184.8		
Electricity	115.5	5,285.1	113.5	6,071.3	
Electricity	5,40	00.6	6,184.8		
Total energy consumption (MWh)	5,833.4		7,09	91.9	
Energy intensity (by number of employees and revenue respectively)	6.0 (per	122.3 (per	5.9 (per	35.0 (per	
, ,	employee)	HKD million) <sup>11</sup>	employee)	HKD million)	

The increase in energy intensity was due to the decrease in revenue which is higher than energy consumption resulted from the COVID-19 pandemic.



During the reporting year, there was a large decrease in direct energy consumption due to the decrease in Towngas usage compared to the previous reporting year. The decrease in the usage of Towngas was resulted from the renovation of restaurants and club and government restriction on social gatherings. Additionally, the decrease in LPG consumption was due to the warmer winter, where the use of heater had been reduced. Indirect energy consumption in 2020 decreased by 12.7% compared to the previous reporting year caused by the decrease in business activities resulted from the COVID-19 pandemic. Overall, the total energy consumption decreased by 17.7% compared to the previous reporting year.

#### Water

The Crowne Plaza Hotel encourages guests and employees to conserve water by posting water-saving notices in the guest rooms and pantry respectively. A water consumption monitoring system has also been implemented to track water consumption. Additionally, water-saving taps in kitchens and washrooms have been installed to reduce water consumption.

Both the Head Office and the Crowne Plaza Hotel do not have any issues in sourcing water that is fit for purpose.

Water Consumption						
	2020		2019			
Water Use	Head Office <sup>12</sup>	Crowne Plaza Hotel	Head Office	Crowne Plaza Hotel <sup>13</sup>		
Water consumption (cubic metres)	257	22,573	209	64,164		
water consumption (cubic metres)	22,830		64,373			
Water intensity (by number of employees and revenue respectively)	5.7	496.5	4.2	330.3		
	(per	(per	(per	(per		
	employee)	HKD million) <sup>14</sup>	employee)	HKD million)		

The COVID-19 pandemic has brought higher awareness in personal hygiene and office sanitary. Hence, water consumption in the Head Office increased by 23.0% in 2020 compared to the previous reporting year as staff are reminded to wash their hands more frequently. On the contrary, the significant decrease of 64.8% in water consumption at the Crowne Plaza Hotel was a result of the decrease in business activities resulted from the COVID-19 pandemic.



Club 28 at Crowne Plaza Hong Kong Causeway Bay, Hong Kong

Pavilion at Crowne Plaza Hong Kong Causeway Bay, Hong Kong

- <sup>12</sup> There are no individual meters in the Head Office for recording water consumption. In 2019, SEA was not able to obtain the data on water consumption from property management. In the reporting year, the amount of water consumed by the Head Office was estimated from the total water use of the entire floor in the commercial building using the floor area ratio.
- <sup>13</sup> This figure was restated as the amount of water consumed by the Crowne Plaza Hotel in 2019 was subsequently updated/clarified.
- <sup>14</sup> The increase in water intensity was due to the decrease in revenue which is higher than water consumption resulted from the COVID-19 pandemic.

#### Paper

In order to reduce paper consumption in the Group's operations, both the Head Office and the Crowne Plaza Hotel encourage the use of electronic copy or e-system for document circulation. All copiers and printers are adjusted to double-sided printing in default. Specifically, at the Crowne Plaza Hotel, old magazines and journals were donated to hospitals, clinics or libraries to lengthen the life cycle of the items.

Paper Consumption						
Paper Use		2020		2019		
		Head Office	Crowne Plaza Hotel	Head Office	Crowne Plaza Hotel	
Paper consumption <sup>15</sup> (tonnes)	2.7	2.4	1.6	4.9		
Paper consumption (tonnes)		5	.1	6	.5	

The increase in paper consumption of the Head Office was due to the increase of business development, where more printing material was required. Overall, the Group decreased its paper consumption by 21.5% during the reporting year. In the future, the Group will continue its efforts in reducing the consumption of paper.

#### **Environment and Natural Resources**

The nature of SEA's business does not involve direct operations that have a significant impact on the environment and natural resources besides emissions and the use of resources.

The Group values the natural environment and is committed to preserving the natural environment. Therefore, the Crowne Plaza Hotel is committed to responsible seafood sourcing in order to minimise the negative impacts that indiscriminate fishing and poor marine culture practices that have been brought to the ocean. These practices are damaging the marine ecosystem and endangering species and future food supply. The Group believes that sustainable consumption of seafood prevents the collapse of the whole ecosystem. In light of this, the Crowne Plaza Hotel sets priority in purchasing seafood products that are wild-caught, farmed sustainably and are listed as "Recommended-Green" by the World Wide Fund Hong Kong to support the restoring depleted fish stock regionally and globally. Additionally, no shark fin is served in its restaurants.

#### **Climate Change**

The increase of frequency in extreme weather caused by climate change may impact the Group's operations. The Group acknowledges its responsibility in identifying and mitigating any significant impacts brought by climate change. Therefore, in the coming year, the Group will formulate a climate-related policy to manage climate issues which have impacted and those which may impact the Group's operations.



Rendering, Grand Victoria, Hong Kong

Paper here mainly involves office paper.



Rendering, Grand Victoria, Hong Kong

# **Our Community**

The Group is committed to delivering lasting benefits to the local communities where it operates. Following the CSR Policy Statement, the Group encourages employees to take part in volunteering and supports employees in their involvement in community programmes.



Dress Casual Day

In order to fight against the COVID-19 pandemic, during the reporting year, the Group made a donation and provided surgical masks to Yang Memorial Methodist Social Service in response to anti-epidemic work and support vulnerable communities. Besides, the Group participated in the "Dress Casual Day", which is the annual charity event organised by the Community Chest. The Group had been awarded the Caring Company Logo by the Hong Kong Council of Social Service in 2020 in recognition of our commitment in caring for our community, employees and environment over the past year.

During the reporting year, the Group did not hold any volunteering activities in order to limit the spread of the disease. The Group will continue to invest in local communities and address the needs of the vulnerable communities and will refine the CSR Policy Statement to include policies on community engagement.



1 Shouson Hill Road East, Hong Kong

# **KPI Summary**

#### **Environmental Performance**

GHG Emissions	2020 Emissions	2019 Emissions
Scope 1: Direct emissions <sup>16</sup> (tonnes of CO <sub>2</sub> -e)	98.4	192.9
Scope 2: Energy indirect emissions <sup>17</sup> (tonnes of CO <sub>2</sub> -e)	3,832.3	5,039.0
Scope 3: Other indirect emissions <sup>18</sup> (tonnes of CO <sub>2</sub> -e)	36.3	77.2
Total GHG Emissions (tonnes of CO <sub>2</sub> -e)	3,967.0	5,309.1
GHG Intensity at the Head Office by number of employees (tonnes of $CO_2$ -e/number of employees)	3.3	3.3
GHG Intensity at Crowne Plaza Hotel by revenue (tonnes of CO2-e/HKD million)	84.019	26.5

Air Emissions	2020 Emissions	2019 Emissions
NOx (kg)	13.73	21.83
SOx (kg)	0.29	0.37
RSP <sup>20</sup> (kg)	0.73	0.86

Hazardous and Non-hazardous Waste	2020 Amount	2019 Amount
Total Hazardous Waste Produced		
Total hazardous waste produced (tonnes) <sup>21</sup>	1.87	0.030
Hazardous waste intensity at the Head Office by number of employees (tonnes/number of employees)	0.002	0.0006
Hazardous waste intensity at Crowne Plaza Hotel by revenue (tonnes/HKD million)	0.04	—
Total Non-hazardous Waste Produced		
Total Non-hazardous waste produced (tonnes)	232.1	333.0
Non-hazardous waste intensity at the Head Office by number of employees (tonnes/number of employees)	0.27	0.26
Non-hazardous waste intensity at Crowne Plaza Hotel by revenue (tonnes/HKD million)	4.84 <sup>22</sup>	1.65

- <sup>16</sup> Scope 1 includes direct emissions from combustion of fossil fuels in stationary sources and mobile sources.
- <sup>17</sup> Scope 2 includes energy indirect emissions by electricity purchased from power companies and gas purchased from Towngas.
- <sup>18</sup> Scope 3 includes other indirect emissions by methane gas generation at landfill in Hong Kong due to disposal of paper waste, fresh water processing, sewage processing and business travel by employees.
- <sup>19</sup> The increase in GHG emissions intensity was due to the decrease in revenue which is higher than GHG emissions resulted from the COVID-19 pandemic.
- <sup>20</sup> Since gaseous fuel consumption is not a significant source of RSP emissions, the figures of RSP do not include Towngas and LPG combustion in Crowne Plaza Hotel's operations.
- The 2020 figure covered both the Head Office and Crowne Plaza Hotel, while the 2019 figure only covered hazardous waste generated by the Head Office.
  The increase in non-bazardous waste intensity was due to the decrease in revenue which is higher than non-
  - The increase in non-hazardous waste intensity was due to the decrease in revenue which is higher than nonhazardous waste generated resulted from the COVID-19 pandemic.



Energy Consumption	2020 Amount	2019 Amount
Direct Energy Consumption	432.8	907.1
Towngas (MWh)	266.2	695.1
LPG (MWh)	0.4	7.5
Petrol (MWh)	143.6	168.3
Diesel (MWh)	22.6	36.2
Indirect Energy consumption	5,400.6	6,184.8
Electricity (MWh)	5,400.6	6,184.8
Energy intensity at the Head Office by number of employees (MWh/number of employees)	6.0	5.9
Energy intensity at Crowne Plaza Hotel by revenue (MWh/ million HKD)	122.3 <sup>23</sup>	35.0

Water Consumption	2020 Amount	2019 Amount
Water consumption (cubic metres)	22,830	64,373
Water intensity at the Head Office by number of employees (cubic metres/number of employees)	5.7	4.2
Water intensity at Crowne Plaza Hotel by revenue (cubic metres/HKD million)	496.5 <sup>24</sup>	330.3

Paper Consumption	2020 Amount	2019 Amount
Paper consumption (tonnes) <sup>25</sup>	5.1	6.5



- <sup>23</sup> The increase in energy intensity was due to the decrease in revenue which is higher than energy consumption resulted from the COVID-19 pandemic.
- The increase in water intensity was due to the decrease in revenue which is higher than water consumption resulted from the COVID-19 pandemic.
- <sup>25</sup> Paper here mainly involves office paper.

#### **Social Performance**

Percentage and number of employees at Head Office (by gender and age group)



<sup>26</sup> All employees at the Head Office are full-time employees.

Y

- Percentage of employees trained = Employees (by Gender) who took part in training / Number of total employees (by Gender) \* 100%
   Bercentage of employees untrained = Untrained employees (by Gender) (Number of total employees (by Gender))
- Percentage of employees untrained = Untrained employees (by Gender)/Number of total employees (by Gender)\* 100%
  Percentage breakdown of employees trained = Employees (by Cender) who take part in training / Number of
  - Percentage breakdown of employees trained = Employees (by Gender) who take part in training / Number of total employees trained \* 100%

Percentage and number of employees at Crowne Plaza Hotel (by gender and age group)



Percentage and number of employees at Crowne Plaza Hotel<sup>30</sup> (by Age Group)



# ESG Reporting Guide Content Index

Material Aspect	Content	Page Index/ Remarks
A. Environment	al	Kemarks
Al Emissions		
General	Information on:	
Disclosure	<ul> <li>(a) the policies; and</li> <li>(b) compliance with relevant laws and regulations that have a significant impact on the issuer</li> <li>relating to air and greenhouse gas emissions, discharges into water and land, and generation of hazardous and non-hazardous waste.</li> </ul>	6,17
A1.1	The types of emissions and respective emissions data.	18, 24
A1.2	Direct (Scope 1) and energy indirect (Scope 2) greenhouse gas emissions (in tonnes) and, where appropriate, intensity.	18, 24
A1.3	Total hazardous waste produced (in tonnes) and, where appropriate, intensity.	19, 24
A1.4	Total non-hazardous waste produced (in tonnes) and, where appropriate, intensity.	19, 24
A1.5	Description of emissions target(s) set and steps taken to achieve them.	18
A1.6	Description of how hazardous and non-hazardous wastes are handled, and a description of reduction target(s) set and steps taken to achieve them.	19
A2 Use of Reso	urces	
General Disclosure	Policies on the efficient use of resources, including energy, water and other raw materials.	17
A2.1	Direct and/or indirect energy consumption by type in total (in MWh) and intensity.	20, 25
A2.2	Water consumption in total and intensity.	21,25
A2.3	Description of energy use efficiency target(s) set and steps taken to achieve them.	20
A2.4	Description of whether there is any issue in sourcing water that is fit for purpose, water efficiency target(s) set and steps taken to achieve them.	21
A2.5	Total packaging material used for finished products (in tonnes) and, if applicable, with reference to per unit produced.	N/A
A3 The Environ	ment and Natural Resources	
General Disclosure	Policies on minimising the issuer's significant impact on the environment and natural resources.	17
A3.1	Description of the significant impacts of activities on the environment and natural resources and the actions taken to manage them.	22
A4 Climate Cha	nge	
General Disclosure	Policies on identification and mitigation of significant climate- related issues which have impacted, and those which may impact, the issuer.	22
A4.1	Description of the significant climate-related issues which have impacted, and those which may impact, the issuer, and the actions taken to manage them.	N/A

Material Aspect	Content	Page Index/ Remarks
B. Social		
<b>B1</b> Employment		
General Disclosure	Information on: (a) the policies; and	
	<ul> <li>(b) compliance with relevant laws and regulations that have a significant impact on the issuer</li> <li>relating to compensation and dismissal, recruitment and promotion, working hours, rest periods, equal opportunity, diversity, anti-discrimination, and other benefits and welfare.</li> </ul>	6, 9-10
B1.1	Total workforce by gender, employment type, age group and geographical region.	26-27
B1.2	Employee turnover rate by gender, age group and geographical region.	N/A
B2 Health and S	afety	
General Disclosure	Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a	
	significant impact on the issuer relating to providing a safe working environment and protecting employees from occupational hazards.	6, 11-12
B2.1	Number and rate of work-related fatalities occurred in each of the past three years including the reporting year.	11
B2.2	Lost days due to work injury.	11
B2.3	Description of occupational health and safety measures adopted, and how they are implemented and monitored.	11-12
B3 Developmen	t and Training	
General Disclosure	Policies on improving employees' knowledge and skills for discharging duties at work. Description of training activities.	9
B3.1	The percentage of employees trained by gender and employee category.	26-27
B3.2	The average training hours completed per employee by gender and employee category.	26-27
<b>B4 Labour Stan</b>	dards	
General	Information on:	
Disclosure	<ul> <li>(a) the policies; and</li> <li>(b) compliance with relevant laws and regulations that have a significant impact on the issuer</li> <li>relating to preventing child and forced labour.</li> </ul>	6,9-10
B4.1	Description of measures to review employment practices to avoid child and forced labour.	10
B4.2	Description of steps taken to eliminate such practices when discovered.	10

Material Aspect	Content	Page Index/ Remarks
<b>B5 Supply Chair</b>	n Management	
General	Policies on managing environmental and social risks of the supply	16
Disclosure	chain.	NI / A
B5.1	Number of suppliers by geographical region.	N/A
B5.2	Description of practices relating to engaging suppliers, number of suppliers where the practices are being implemented, and how they are implemented and monitored.	16
B5.3	Description of practices used to identify environmental and social risks along the supply chain, and how they are implemented and monitored.	N/A
B5.4	Description of practices used to promote environmentally preferable products and services when selecting suppliers, and how they are implemented and monitored.	16
<b>B6 Product Res</b>	ponsibility	
General	Information on:	
Disclosure	<ul> <li>(a) the policies; and</li> <li>(b) compliance with relevant laws and regulations that have a significant impact on the issuer</li> <li>relating to health and safety, advertising, labelling and privacy matters relating to products and services provided and methods of redress.</li> </ul>	6,14-16
B6.1	Percentage of total products sold or shipped subject to recalls for safety and health reasons.	N/A
B6.2	Number of products and service related complaints received and how they are dealt with.	16
B6.3	Description of practices relating to observing and protecting intellectual property rights.	N/A
B6.4	Description of quality assurance process and recall procedures.	16
B6.5	Description of consumer data protection and privacy policies, and how they are implemented and monitored.	14
B7 Anti-corrupti	ion	
General	Information on:	
Disclosure	<ul> <li>(a) the policies; and</li> <li>(b) compliance with relevant laws and regulations that have a significant impact on the issuer</li> <li>relating to bribery, extortion, fraud and money laundering.</li> </ul>	6,13
B7.1	Number of concluded legal cases regarding corrupt practices brought against the issuer or its employees during the reporting period and the outcomes of the cases.	13
B7.2	Description of preventive measures and whistle-blowing procedures, and how they are implemented and monitored.	13
B7.3	Description of anti-corruption training provided to directors and staff.	13
B8 Community I	nvestment	
General Disclosure	Policies on community engagement to understand the needs of the communities where the issuer operates and to ensure its activities take into consideration the communities' interests.	23
B8.1	Focus areas of contribution.	N/A
B8.2	Resources contributed to the focus area.	23
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# GLOSSARY

In this environmental, social and governance report, unless the context otherwise requires, the following expression shall have the following meanings:

"Board"	the board of Directors;
"Company" or "SEA"	S E A Holdings Limited is an exempted company incorporated in Bermuda with limited liability, the shares of which are listed and traded on the Main Board of the Stock Exchange (Stock code: 251);
"CO <sub>2</sub> "	carbon dioxide;
"CO <sub>2</sub> -e"	CO <sub>2</sub> equivalent;
"Crowne Plaza Hotel"	Crowne Plaza Hong Kong Causeway Bay, Hong Kong;
"CSR Policy Statement"	Corporate Social Responsibility Policy Statement adopted by the Company;
"Director(s)"	the director(s) of the Company;
"EMSD"	Electrical and Mechanical Services Department of Hong Kong;
"ESG"	environmental, social and governance;
"ESG Reporting Guide"	Environmental, Social and Governance Reporting Guide contained in Appendix 27 to the Rules Governing the Listing of Securities on the Stock Exchange;
"GHG"	greenhouse gas;
"GHG" "Group or SEA Group"	greenhouse gas; the Company and its subsidiaries;
"Group or SEA Group"	the Company and its subsidiaries;
"Group or SEA Group" "Head Office"	the Company and its subsidiaries; main office of the Company in Hong Kong;
"Group or SEA Group" "Head Office" "Hong Kong"	the Company and its subsidiaries; main office of the Company in Hong Kong; the Hong Kong Special Administrative Region of the PRC;
"Group or SEA Group" "Head Office" "Hong Kong" "KPIs"	the Company and its subsidiaries; main office of the Company in Hong Kong; the Hong Kong Special Administrative Region of the PRC; key performance indicators;
"Group or SEA Group" "Head Office" "Hong Kong" "KPIs" "LPG"	the Company and its subsidiaries; main office of the Company in Hong Kong; the Hong Kong Special Administrative Region of the PRC; key performance indicators; liquefied petroleum gas;
"Group or SEA Group" "Head Office" "Hong Kong" "KPIs" "LPG" "NOx"	the Company and its subsidiaries; main office of the Company in Hong Kong; the Hong Kong Special Administrative Region of the PRC; key performance indicators; liquefied petroleum gas; nitrogen oxides;
"Group or SEA Group" "Head Office" "Hong Kong" "KPIs" "LPG" "NOx" "PRC/ China"	the Company and its subsidiaries; main office of the Company in Hong Kong; the Hong Kong Special Administrative Region of the PRC; key performance indicators; liquefied petroleum gas; nitrogen oxides; The People's Republic of China;
"Group or SEA Group" "Head Office" "Hong Kong" "KPIs" "LPG" "NOx" "PRC/ China"	the Company and its subsidiaries; main office of the Company in Hong Kong; the Hong Kong Special Administrative Region of the PRC; key performance indicators; liquefied petroleum gas; nitrogen oxides; The People's Republic of China; respiratory suspended particles;

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# 爪哇控股有限公司 S E A Holdings Limited

(Incorporated in Bermuda with limited liability) (於百募達註冊成立之有限公司)