



ENVIRONMENTAL,  
SOCIAL AND  
GOVERNANCE  
REPORT

2020



長城一帶一路  
Great Wall Belt & Road

**Great Wall Belt & Road Holdings Limited**  
**長城一帶一路控股有限公司**

(Incorporated in Bermuda with limited liability)  
(Stock Code: 524)

# ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

## SCOPE AND REPORTING YEAR

Great Wall Belt & Road Holdings Limited (the “Company”, or “Great Wall B&R”) and its key operating subsidiaries (collectively referred to as the “Group”), are pleased to highlight its Environmental, Social, and Governance (the “ESG”) performance in this ESG report, with disclosure reference made to the ESG Reporting Guide (the “ESG Guidelines”) as set out in Appendix 27 to the Rules Governing the Listing of Securities on the Main Board (the “Main Board Listing Rules”) of The Stock Exchange of Hong Kong Limited (the “Stock Exchange”).

The Group has appointed a third-party consulting company to prepare this ESG report to ensure its objectivity. This ESG report covers the Group’s overall performance in two subject areas, namely Environmental and Social, of its key business operations (the “Key Operations”) in Hong Kong, Hangzhou, China and Singapore from 1 January 2020 to 31 December 2020 (the “Reporting Year”) which aligns with the financial year ended 31 December 2020 in the 2020 annual report of the Group, unless otherwise stated.

The Key Operations included in this ESG report:

- Great Wall B&R, which carries out mainly administrative and investment holding activities in Hong Kong;
- Hangzhou Susong Technology Company Limited\* (杭州蘇頌科技有限公司) (“Hangzhou Susong”), which provides financial payment processing solutions, software development services and distribution businesses in China. Due to the Coronavirus Disease 2019 (“COVID-19”) pandemic, no business activities were carried out during the Reporting Year; and
- ZONE Telecom Pte Ltd (“Zone Telecom”), which is an info-communication service provider licensed by the Infocomm Media Development Authority of Singapore. ZONE Telecom offers broadband connectivity, and a comprehensive suite of voice and data services and solutions to business organisations and residential customers.

\* for identification purpose only

The information in this ESG report was gathered and organised through various channels, including but not limited to internal control policies of the Group, the factual evidence of the implementation of the ESG strategies, the key performance indicators (the “KPIs”) listed according to the ESG Guidelines, and the annual performance quantitative data of the Group in respect of its business operations and ESG management.

## REPORTING BOUNDARY

- Great Wall Belt & Road Holdings Limited
- Hangzhou Susong Technology Company Limited\* (杭州蘇頌科技有限公司)
- ZONE Telecom Pte Ltd

\* for identification purpose only

## THE COMPANY’S MISSION AND VISION ON SUSTAINABILITY COMMITMENT

The Group is committed to achieving high standards of ESG performance and meeting all applicable legal requirements in the markets where it operates. It regards this as an important foundation for the Group to engage its stakeholders and grow its business responsibly and sustainably. In addition, the Group attaches great importance to the employee development, environmental protection and supplier management.

## ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

### ESG MANAGEMENT APPROACH

The Group's ESG approach is to ensure that the Group continues to create long-term value for its stakeholders by retaining the economic and social advantages of its operations. It also takes the necessary steps to protect and support the communities with multiple values.

The Group strives to address the potential risk and opportunities brought by sustainability issues by encouraging cross-departmental collaboration. The approach to tackle problems from multiple points of view is expected to provide more comprehensive solutions to problems that the society is facing today.

The Group understands that environmental conservation and community engagement are more than a moral imperative, it also makes good business sense. By upholding its commitment to corporate social responsibility, the Group strives to forge itself into an environmentally friendly enterprise that cares about its employees' development and protects their rights and interests.

The board of directors of the Company (the "Board") acknowledges its responsibility for ensuring the integrity of this ESG report and to the best of its knowledge, this ESG report addresses all material issues and fairly presents the ESG performance of the Group and its impact. The Board confirms that it has reviewed and approved this ESG report.

### CERTIFICATION

Over the years, the Group has made considerable endeavours in reducing waste in the course of its operations. The Company has been recognised and awarded the "Wastewi\$e Certificate – Excellence Level" (the "Excellence Level Certificate") by Hong Kong Green Organisation Certification (the "HKGOC") for the 6th consecutive year. The scheme, established by, among others, the Environmental Protection Department and Environmental Campaign Committee, encourages Hong Kong businesses and organisations in adopting structured measures to reduce the amount of waste generated within their establishments or generated through the services and products they provide. Having acquired and renewed the Excellence Level Certificate, it means that the Company has

- fulfilled at least 50% of the waste reduction measures (which surrounds the categories of establishing leadership, avoiding waste, collecting and recycling, and buying recycled products) as required by the HKGOC;
- accumulated at least 9 goals that cover at least 2 of the 3 latter categories as aforementioned; and
- achieved at least 1 new goal each year.

The Group will continue to explore other schemes and programmes that it can participate in to contribute more in achieving sustainability.

### STAKEHOLDERS' FEEDBACK

The Group welcomes stakeholders' feedback on its ESG approach and performance. You are welcomed to provide your suggestions or share your views with the Group through any channel below to help the Group improve its ESG performance:

Email: investor@gwbrhk.com  
Website: <http://www.gwbrhk.com/contact/contact.htm>  
Address: Room 1602, 16/F., COFCO Tower, 262 Gloucester Road, Causeway Bay, Hong Kong.  
Phone: +852 2522 3800  
Fax: +852 2111 2665

The following sections provide more information about the Group's practices in the areas of the environment, investment practices, employees' engagement and development, good operating practices and the contribution to the community.

## STAKEHOLDERS' ENGAGEMENT

In order to define the current and future sustainability strategies, it is important to understand stakeholders' perspectives and expectations on the development and success of the Group and help assess the potential impacts of the future business activities.

The Group will continue to establish effective communication with the major stakeholders in various ways in order to deal with their concerns and provide feedback in a timely manner. It is believed that it is necessary to consider the needs of all stakeholders, which is conducive to maintaining a long-term friendly relationship with shareholders and investors, employees, customers and public bodies. The areas of concern considered by the stakeholders are listed below:

Major Stakeholder	Major Communication Channels	Major Concerns
Shareholders and Investors	<ul style="list-style-type: none"> <li>Press release, Corporate Announcements and Circulars</li> <li>Annual and Interim Reports</li> <li>General Meetings</li> <li>Investor Mailbox</li> </ul>	<ul style="list-style-type: none"> <li>Business Development Plan</li> <li>Financial and Business Stability</li> <li>Information Disclosure and Transparency</li> <li>Profitability</li> </ul>
Employees	<ul style="list-style-type: none"> <li>Trainings and Team Building Activities</li> <li>Business Meetings and Briefings</li> <li>Performance Appraisals</li> </ul>	<ul style="list-style-type: none"> <li>Career Development and Training Opportunities</li> <li>Compensation and Benefits</li> <li>Health &amp; Safety Work Environment</li> <li>Personal Data Protection and Security</li> </ul>
Public Community	<ul style="list-style-type: none"> <li>Charitable and Volunteering Activities</li> <li>Community Interactions</li> <li>Marketing</li> </ul>	<ul style="list-style-type: none"> <li>Corporate Social Responsibilities</li> <li>Community Investment and Charitable Activities</li> </ul>
Government and Supervisory Institutions	<ul style="list-style-type: none"> <li>Compliance Reports</li> <li>Major Meetings and Policy Consultations</li> <li>Information Disclosures</li> <li>Examinations and Inspections</li> <li>ESG Report</li> </ul>	<ul style="list-style-type: none"> <li>Compliance Operation</li> <li>Corporate Governance</li> <li>Environmental Protection</li> </ul>
Environment		<ul style="list-style-type: none"> <li>Energy Saving and Emission Reduction</li> <li>Mitigation Measures</li> </ul>
Customers	<ul style="list-style-type: none"> <li>Business Communication</li> <li>Customer Feedback</li> </ul>	<ul style="list-style-type: none"> <li>Information Security</li> <li>Products and Services Quality</li> </ul>

## ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

During the Reporting Year, through various communication channels, the Group has learnt the concerns from the major stakeholders, including environmental and energy saving measures, compliance operation, information disclosure, privacy protection and community involvement.

### A. ENVIRONMENTAL

The Group has established a set of environmental protection management policies, mechanisms and measures to ensure the sustainable development and operation of the Group. In order to pursue the sustainable development of environment and community, the Group is becoming more and more cautious in controlling its emissions and resources consumption and strictly abides by the relevant environmental laws and regulations of different countries in where the Group has daily operations.

This section primarily discloses the Group's policies, practices, and quantitative data on emissions, use of resources, the environment and natural resources in the Reporting Year.

#### A1. EMISSIONS

The Group is committed to reducing its energy consumption, greenhouse gas ("GHG") emissions, water consumption and waste footprint by high efficiency and green development concept. The awareness of environment protection is integrated in the strategies and all the operational procedures of the Group.

During the Reporting Year, the Group did not have any cases of material non-compliance relating to air and GHG emissions, discharge into water and land, and generation of hazardous and non-hazardous waste as required by the applicable laws and regulations. The Group also did not receive any complaints in relation to environment protection raised by the customers or others.

##### Types of Emissions

Due to the nature of the Group's business (please refer to page 1 of this ESG report for the business nature of the Group), no significant air emission, discharge into water or land were reported in relation to its operations in Hong Kong and Singapore. No substantial hazardous waste was produced by the Group in Hong Kong and Singapore during the Reporting Year.

During the Reporting Year, the Group has reduced the amount of air emissions due to the nature of the Group's business. The Group actively uses video conference call system platforms and email discussions to replace unnecessary business travels for reduced emissions.

##### GHG Emissions

During the Reporting Year, 16.26 tonnes (2019: 28.09 tonnes) of carbon dioxide equivalent (tCO<sub>2</sub>e), which included carbon dioxide, methane, nitrous oxide, and hydrofluorocarbons, were emitted by the Group. It has a decrease due to the COVID-19 pandemic leading to less business air traveling by the Group during the Reporting Year. The Group has also encouraged its staff to use electronic form of documents to reduce the use of paper. The intensity was 0.04 tCO<sub>2</sub>e/m<sup>2</sup> (2019: 0.06 tCO<sub>2</sub>e/m<sup>2</sup>), or 0.68 tCO<sub>2</sub>e/employee (2019: 0.83 tCO<sub>2</sub>e/employee). Hangzhou Susong's emission is not included in the calculation as its office is in a co-working business centre and is not required to pay any utility bills. It did not contribute to any other indirect emissions.

The Group has strictly complied with the relevant laws and regulations in relation to GHG emissions.

**Table 1 GHG Emission by Scope**

		<b>2020 Emissions (tCO<sub>2</sub>e)</b>	<b>2019 Emissions (tCO<sub>2</sub>e)</b>	<b>% Change</b>
<b>Scope 1 Direct Emission</b>	N/A (Note 1)	N/A	N/A	N/A
<b>Scope 2 Indirect Emission</b>	Purchased electricity (Note 2)	14.01	14.18	(1.20%)
<b>Scope 3 Other Indirect Emission</b>	Business air travel	0.63	6.61	(90.47%)
	Paper waste disposed at landfills	1.62	7.30	(77.81%)
<b>Total</b>		16.26	28.09	(42.11%)

*Note 1: No direct emission due to the Group's business nature (please refer to page 1 of this ESG report for the business nature of the Group).*

*Note 2: Margin emission factor of 0.81 tCO<sub>2</sub>e/MWh was used for purchased electricity in Hong Kong.*

*Note 3: Emission factors were made reference to Appendix 27 to the Main Board Listing Rules and its referred documentation as set out by the Stock Exchange, unless stated otherwise.*

*Due to update of the in-scope entities, the emissions of 2019 have been recalculated, and figures have been restated accordingly.*

### **Hazardous Waste Produced**

The Group produced 0 kg (2019: 60.55 kg) of hazardous waste in 2020. The intensity was 0 kg/m<sup>2</sup> (2019: 0.13 kg/m<sup>2</sup>), or 0 kg/employee (2019: 1.78 kg/employee) during the Reporting Year. The Group will try to maintain the hazardous waste produced at a minimum level for the coming years.

Due to update of the in-scope entities, the figures of 2019 have been restated.

### **Non-hazardous Waste Produced and Paper Consumption**

During the Reporting Year, the Group generated 0 kg (2019: 182.77 kg) of non-hazardous waste, which mainly composed of wastepaper, newspaper, and corrugated boxes. The intensity was 0 kg/m<sup>2</sup> (2019: 0.38 kg/m<sup>2</sup>), or 0 kg/employee (2019: 5.38 kg/employee).

The Group will try to maintain the non-hazardous waste produced at a minimum level for the coming years.

Due to update of the in-scope entities, the figures of 2019 have been restated.

### **Measures to Mitigate Emissions**

The Group has offered tips and guidelines for efficient use of energy, which can be found in "Waste Handling and Reduction Initiatives" section of this ESG report. The major source of the Group's air emissions is from electricity consumption.

In addition to different means of reducing electricity consumption, the Group's business travels may also contribute to certain carbon footprint. Furthermore, the Group actively uses video conference call system platforms and email discussions to replace unnecessary business travels for reduced emissions. The Group will continue taking steps in further reducing the use of fossil fuels and air emissions by using more public transport and reduce the frequency of air travel.

### **Waste Handling and Reduction Initiatives**

Though the Group did not generate a significant amount of waste due to its business nature, waste reduction and responsible waste disposal are a priority of the Group's management approach. Since 2015, the Group has been certified the Excellence Level Certificate for its continuous commitment in establishing waste reduction measures and goals.

In addition, the Group has adopted a number of waste reduction measures to protect the environment:

- To encourage the use of both sides of the paper when printing and photocopying;
- To encourage the use of electronic documents instead of paper printing;
- To place recycled boxes for the collection of the used ink and toner cartridges in the office area; and
- To encourage reuse of envelopes/packaging for the internal post with new labels.

Most of the non-hazardous waste, mainly from wastepaper, was sent to landfill.

The Group distributes office memo through email to promote the adoption of green initiatives to all staff on a regular basis.

Through the above mitigation measures, the Group believes that they will change the behaviour on the use of resources in its workplaces and achieve the goal of waste reduction in the coming years.

The Group will continue to explore to participate in other schemes and programmes to contribute more in achieving sustainability.

## **A2. USE OF RESOURCES**

The Group strives to use resources effectively and minimise the discharge of wastes. In the ordinary course of business, the Group has implemented various energy saving and emission reduction measures. Apart from the waste reduction actions mentioned above, the other relevant examples are as follows:

Reduce:

- Less printout for client communications and corporate materials;
- Office supply purchase across departments to avoid unnecessary purchases and disposals;
- To encourage employees to switch off the lights, air-conditioning and computer monitor after office hours or when they are not in use;

Reuse:

- Reuse of office equipment;

Recycle:

- Waste stream segregation; and
- Staff training and behavioural change.

The Group is aware that resources shall be preserved. It has established policies and guidelines on the efficient use of energy and water for daily operational purposes.

### Energy Consumption

In 2020, the Group consumed an equivalent of 17,291 kWh energy (2019: 17,505 kWh energy), with an intensity of 39.07 kWh/m<sup>2</sup> (2019: 36.31 kWh/m<sup>2</sup>), or 720.46 kWh/employee (2019: 514.85 kWh/employee). Energy consumption was mainly composed of electricity in the office. Compared with 2019, there is a slight decrease in the energy consumption of the Group due to the decrease in number of working days in office as a result of work-from-home arrangement during the Reporting Year. The Group also promoted energy-saving measures in office area.

Due to update of the in-scope entities, the figures of 2019 have been restated.

### Water Consumption

Water consumption within the offices in Hong Kong, Singapore and Hangzhou were managed by the property management office, so the information was not readily available. If there are any information that the Group could obtain, they would keep the information for the future use in ESG report.

### Energy Use Efficiency Initiatives

In order to achieve higher energy efficiency, the Group implemented the following key measures during the Reporting Year:

- Promoting the consciousness of saving electricity. The Group consciously develops good habits of power consumption among its employees and timely discourages the behaviour of wasting electricity;
- Using lighting reasonably. When there are fewer people in offices, try to turn on the lights as little as possible or only start the overhead lights. The last person in the office needs to turn off the lights;
- Turning off or putting in energy-saving mode of electrical appliances including computers, printers, copiers and other equipment when not in use to avoid unnecessary power consumption; and
- Maintaining a room temperature at 25.5°C.

The above measures improve energy efficiency and reduce energy consumption by preserving natural resources and reducing GHG emissions.

### Water Use Efficiency Initiatives

Although an insignificant amount of water is consumed in the ordinary course of the Group's business, the Group understands the importance of conserving water and advocates within the workplace several water saving practices.

During the Reporting Year, the Group does not have any issues in sourcing water that is fit for purpose.

### Packaging Material

The Group does not use a significant amount of packaging materials, due to the nature of its business.

### A3. THE ENVIRONMENT AND NATURAL RESOURCES

#### Significant Impacts of Activities on the Environment

Due to the nature of the Group's business (please refer to page 1 of this ESG report for the business nature of the Group), no significant environmental issue was noted in the business activities during the Reporting Year. However, the Group is well aware that its daily operational activity still generates emissions and consumes resources. The Group is working on various sustainable development activities to ensure the resources are used effectively in the ordinary course of business.

To minimise its impacts on the environment, the Group is committed to carrying out environmental protection measures. The Group will pay attention to relevant laws and regulations and continue reviewing its policies and practices to eliminate any risks involved.

There will be more concerns from local government and international community over carbon emissions, the Group will act in accordance with the ESG provisions as set out by the Stock Exchange. The Group will continue to report environmental KPIs and information as well as social information in accordance with the provisions.

The Group is not aware of any material non-compliance matters relating to use of resources and the Group had in all material aspects complied with all relevant environment rules and regulations in Hong Kong, Hangzhou and Singapore during the Reporting Year.

## B. SOCIAL

### B1. EMPLOYMENT

The Group has always considered talents as its most valuable resource and asset. The Group respects and protects the statutory rights and interests of employees, provides a fair career development platform, cares about its employees' physical and mental health, and joins hands with employees to realize sustainable development.

The Group has developed sound employment policies covering the requirements and standards of recruitment to ensure the efficient management of human resources.

The Group is committed to implementing the remuneration distribution principles based on performance, efficiency and fairness. On top of labour basic salary, the Group may pay performance bonuses in accordance with employees' performance and the Group's business performance. In order to maintain a competitive remuneration package, the Group carries out evaluation and adjustment on remuneration every year with reference to the average wage, the consumption level and the industry practice of the relevant city, so as to attract and retain talents.

During the Reporting Year, the Group complied with all relevant laws and regulations in relation to compensation and dismissal, recruitment and promotion, working hours, rest periods, equal opportunity, diversity, anti-discrimination, and other benefits and welfare. The Group is not aware of any material non-compliance matters or any violation of employment and labour-related regulations during the Reporting Year.

#### Employee Engagement

The Group has outlined the general procedures and practices of the Group related to employment, compensation and benefits in its employee handbook (the "Employee Handbook"). In order to ensure diversity and equality, the selection process is non-discriminatory and is solely based on the employee's performance, experience and skills.

## ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

The Group adopts bilateral communications policy. Employees have several channels to express their concerns and communicate with management as outlined in the following:

- Emails – the Group conveys general information, for instances, new hires, activities, policies and procedures updates to all employees;
- Meetings – the Group holds regular meetings, where the executive directors, management representatives and employees can together share their views on the Group's policies and business operations;
- Instant messaging tools – the Group sets up chatrooms in the widely used mobile communication platforms, such as WhatsApp and WeChat, to facilitate and encourage communications; and
- Other bonding activities – the Group encourages casual gatherings, holds celebratory parties at Chinese New Year and Christmas and organises birthday parties, where employees are encouraged to establish closer ties.

### Remuneration and Benefits

The Group offers a wide range of incentives to the employees, including competitive wages and proper insurance coverage. The Group may also distribute bonuses to employees based on their contribution to the Group's performance throughout the Reporting Year. These incentives and benefits are benchmarked against industry peers, ensuring that the Group continues to be a destination for quality talents.

Additionally, the Group aims to offer additional benefits to its employees including, but not limited to, medical and dental allowances, paid paternity and maternity leave, as well as training and education subsidies. Some other benefits that are provided, including:

- Shortened working hours on certain days of festivals, such as the Chinese Winter Solstice Festival, Mid-autumn Festival, and Chinese New Year Eve;
- Marriage Leave; and
- Compassionate leave.

### Recruitment, Promotion and Dismissal

The Group has developed a fair recruitment and promotion policy that prohibits damage to equal employment opportunity or unfair treatment. As such, the Group strictly enforces an anti-discrimination policy and has zero tolerance for harassment in any form. All decisions in relation to recruitment, promotion, and dismissal shall be concluded based on the candidates'/employees' experience, ability, capacity, background, and irrespective of their race, gender, religious belief, social origin or identity, age, physical condition and marital status, etc.

The Group conducts objective and comprehensive assessment to evaluate employees' working ability and performance, and provide basis for employees' promotion, transfer of position or salary increment. The Group is committed to providing competitive salary and other benefits in order to retain and motivate the talents. The remuneration scheme is reviewed annually with reference to the market practices as well as experience and performance of the staff. The working hours, leaves and other statutory requirements such as social insurance are all in compliance with the applicable laws and regulations.

The Group also welcomes employees to discuss their targets and expectations in job advancement and career development with the senior management if they have any ideas or difficulties regarding their job.

There were no non-compliance cases in relation to employment laws and regulations during the Reporting Year.

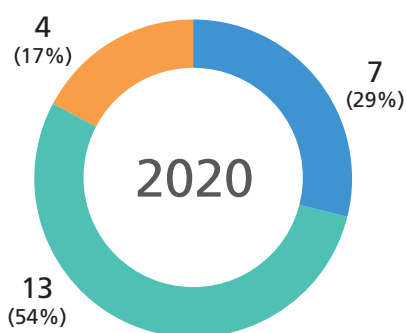
### Rest Days and Holidays

The Group provides employees with various paid leaves and holidays as stated in the employment contracts according to their position ranking. Some holidays provided include statutory holidays, maternity or paternity leaves, study and examination leaves, marriage leaves and annual leaves.

### Total Workforce

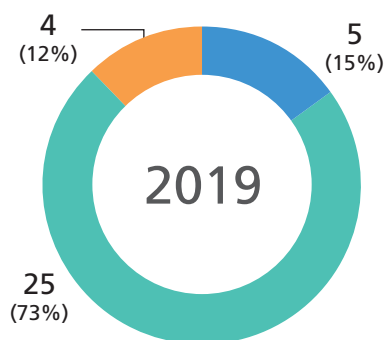
As of 31 December 2020, the Group had 24 employees (2019: 34 employees), 95.83% (2019: 97.06%) of which worked full-time. The decrease is mainly due to the reduced number of employees as part of cost-saving measures due to the COVID-19 pandemic during the Reporting Year.

Total Workforce by Job Grade  
(Number of employees)



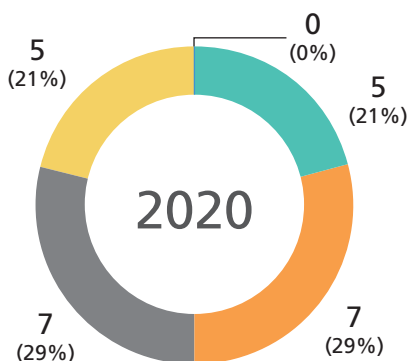
● Senior Management ● Middle Management  
● Frontline & Other Staff

Total Workforce by Job Grade  
(Number of employees)



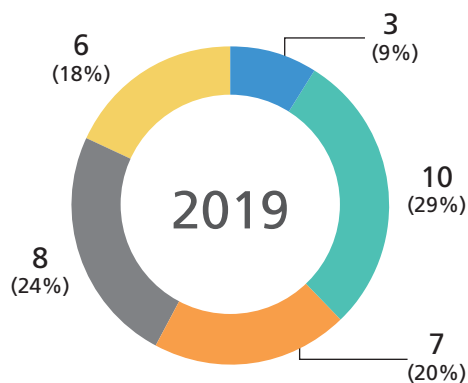
● Senior Management ● Middle Management  
● Frontline & Other Staff

Total Workforce by Age Group  
(Number of employees)

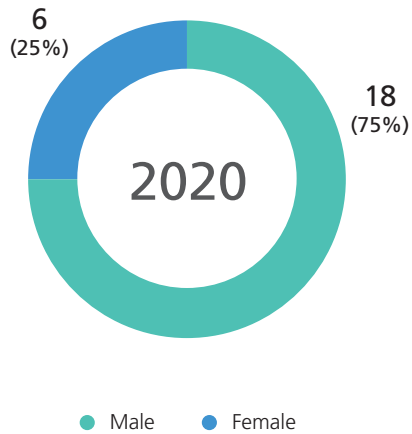
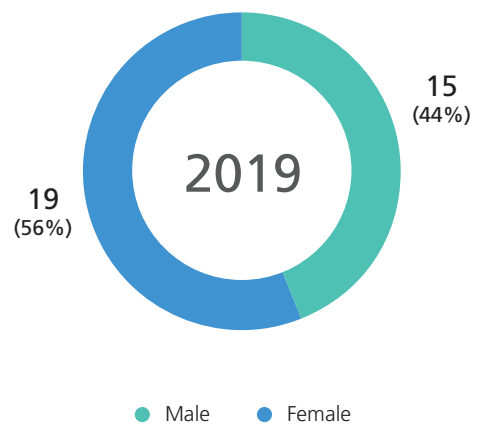
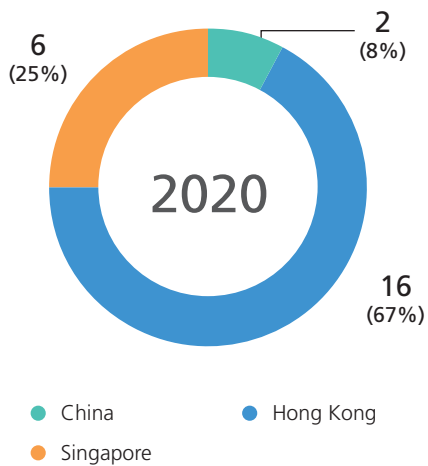
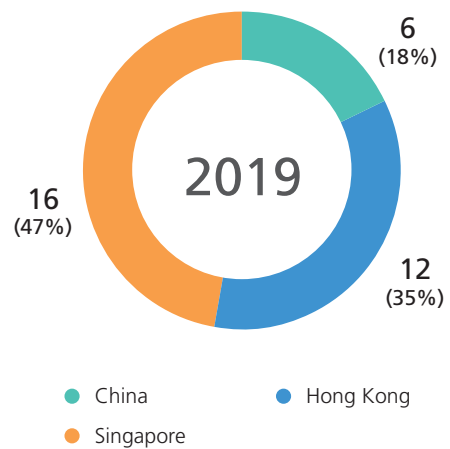


● 18-25 ● 26-35 ● 36-45  
● 46-55 ● 56 or above

Total Workforce by Age Group  
(Number of employees)



● 18-25 ● 26-35 ● 36-45  
● 46-55 ● 56 or above

Total Workforce by Gender  
(Number of employees)Total Workforce by Gender  
(Number of employees)Total Workforce by Geographical Location  
(Number of employees)Total Workforce by Geographical Location  
(Number of employees)**Turnover**

During the Reporting Year, there are 15 employees (2019: 10 employees) left the Group, contributing to a turnover rate of 62.50% (2019: 29.41%). The significant increase is mainly due to the reduced number of employees as part of cost-saving measures during the COVID-19 pandemic during the Reporting Year.

### B2. EMPLOYEE HEALTH AND SAFETY

Health and safety in the workplace is part of the duty of care for employees. The Group has complied with all laws and regulations relating to providing a safe working environment and protecting employees from occupational hazards, and strives to eliminate any risks associated with the operations. As a responsible employer, the Group is committed to reducing accidents, illness, and risks in the workplace, promoting the health of its employees, so as to reduce the absence rate and employee turnover rate. The Group focuses on major areas to minimise occupational hazards and health and safety risks:

- Smoking is strictly prohibited in the office area;
- Employees should carefully check the electric switches, door and window locks, etc. before going off duty to eliminate the hidden dangers;
- No one is allowed to repair electrical appliances or other office equipment without proper training;
- Employees who continue to act in an unsafe manner will face disciplinary action; and
- Employees must strive to improve the sanitary environment in the workplace and comply with health care and sanitation measures.

During the Reporting Year, the Group did not receive any report of non-compliance cases regarding employee health and safety, nor any work-related fatalities.

The Group shows its genuine care for its employees. As to mitigate the impact of the COVID-19 pandemic, the Group has taken response and precautionary measures to protect the health of employees:

- Face masks, hand sanitizers and alcohol pads were provided to all employees and available at workplace areas;
- Infrared thermometers were placed at the entrance of the office to monitor the body temperature of employees and visitors;
- Sanitation and space disinfection were frequently carried out to maintain the hygiene of workplace;
- Staff members were encouraged to use on-line meetings instead of face-to-face meetings; and
- Team rotation for home office, flexible working hours implemented.

### **Group's Health and Safety Policy**

During the Reporting Year, no substantial safety hazards are involved within the workplace.

As a general practice, the Group ensures the first aid kits are available and placed in offices for any emergencies.

In Hong Kong and Singapore, the Group:

- cleaned carpets and water dispensers regularly; and
- reviewed its health and safety policies and practices regularly.

### **B3. DEVELOPMENT AND TRAINING**

The Group strives to foster a positive working environment where all individuals are supported and given the opportunity to develop to their fullest potential. The Group believes that it is a key for an enterprise to develop sustainably by having a team of talents cultivated by itself.

In order to achieve that, the Group offers opportunities for employees to develop their knowledge and skills in personal and professional training, through:

- holding regular sharing sessions, peer learning and on-the-job coaching;
- reimbursing employees the fee of external training courses to enhance their competencies in performing their jobs; and
- providing paid sabbatical leaves, such as for attending examinations or acquiring professional qualifications, which are relevant to the industries or job positions.

The Group continually reviews training and education needs of employees, assists employees to plan their career development, and encourages employees to participate in professional lectures, seminars and training courses to enhance their ability.

### **Percentage of Employees Trained**

During the Reporting Year, the Group did not maintain detailed records of the number of employees who had received the training.

### **Average Training Hours Completed**

Training hours were not recorded during the Reporting Year. The Group has actively encouraged professional staff to participate in continuous professional development to maintain and improve their work skills and knowledge.

### B4. LABOUR STANDARDS

#### **Labour Practice and Employment**

As the Group highly values and protects our employees' human rights and benefits, the Group strictly complies with all legal regulations and has executed a series of internal policies set out by our human resources department. In line with the employment laws in Hong Kong, Singapore and China, all employees of the Group in Hong Kong are covered by the Employment Ordinance (Chapter 57 of the Laws of Hong Kong), Mandatory Provident Fund Schemes Ordinance (Chapter 485 of the Laws of Hong Kong) and Minimum Wage Ordinance (Chapter 608 of the Laws of Hong Kong); all the employees in Singapore are covered by Employment Act (Chapter 91 of the Singapore Statutes) and Central Provident Fund Act (Chapter 36 of the Singapore Statutes); and all employees in China are covered by the Labour Law of the People's Republic of China (《中華人民共和國勞動法》), the Labour Contract Law of the People's Republic of China (《中華人民共和國勞動合同法》) and General Principles of the Civil Law of the Peoples Republic of China (《中華人民共和國民法通則》). Remuneration less than the minimum wage are prohibited according to the relevant local and national laws and regulations.

#### **Measures taken to avoid child and forced labour**

The Group strictly abides by the relevant employment and labour laws and regulations and has never employed any child labour or forced labour. The Group hopes that its employees enjoy their fundamental rights related to labour. The Group monitors the recruitment process frequently to prevent the occurrence of illegal conduct. The Group did not discover any material non-compliance matters of labour rights and labour-related laws and regulations during the Reporting Year.

### B5. SUPPLY CHAIN MANAGEMENT

#### **Supplier Identification, Evaluation and Selection**

The supply chain of the Group comprises mainly of equipment and service providers for telecommunication, vendors for office equipment, as well as agents for travel-related services.

The selection criteria of suppliers should be objective and quantifiable, so as to ensure that the process of supplier selection is fair and equitable. The factors to be considered in the supplier selection include price, quality, delivery reliability, anti-corruption, after-sales service, etc. These processes help to identify the most suitable supplier and maximize the economic benefits to the Group.

During the Reporting Year, the number of suppliers are listed as below:

<b>Number of Suppliers by Region</b>	<b>2020</b>
Bulgaria	1
Hong Kong	13
Malaysia	2
Myanmar	1
New Zealand	1
Singapore	56
Switzerland	1
Thailand	2

### **Supplier Monitoring**

The Group adheres to good communication, effective cooperation and joint development with suppliers when engaging its suppliers. By maintaining close and frequent communications, the Group is able to strengthen its cooperation and trust with suppliers, so as to enhance the Group's capability to request environmentally friendly products from suppliers.

## **B6. PRODUCT/SERVICE RESPONSIBILITY**

The Group aims to provide high value-added telecommunication services with the highest degree of integrity to clients at competitive rates.

### **Intellectual Property**

No significant issue related to intellectual property rights was noted for the Reporting Year. However, the Group is aware that relevant steps should be taken to follow all relevant regulations in order to protect intellectual properties which belong to itself or any other third parties.

### **Quality Assurance**

To improve and maintain the quality of products and services provided, the Group pays attention to all complaints received via established communication channels, and reviews customers' opinions and comments regarding the products sold. Based on such feedbacks, the Group carries out investigations, writes reports and takes corrective measures to ensure that the quality of its products are top-notch.

During the Reporting Year, there were no products recalled. The Group did not violate or breach any laws and regulations relating to product responsibility.

## ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

### **Data Protection**

Protecting data privacy of customers is one of the Group's priorities. In order to protect personal information and prevent information leakage, the Group has implemented a number of measures in regard of data privacy.

At the operational level, data-protection software is installed on employees' computers. As the software requires employees to renew its login passwords after certain intervals, and carries out regular updates on its own, the systems are kept secured from cyber-attacks.

At the corporate level, the Group is also committed to safeguarding data protection. Unauthorised access to customer information is prohibited by restricting access to the database, which is controlled by granting rights only after careful examination and assigning them to designated management staff.

Regarding paper documents, the Group adopts control to ensure secured access. Shredding facilities are available for the destruction of confidential paper documents.

During the Reporting Year, the Group has complied with Personal Data (Privacy) Ordinance of Hong Kong and the relevant laws and regulations of different countries. The Group was not aware of any circumstances of customers' personal data being stolen, altered, damaged or leaked out during the Reporting Year.

### **Handling of Complaints**

The Group has established policies and procedures for handling complaints including reviewing all customer complaints, collecting evidence and providing feedback and suggestions on general complaints.

During the Reporting Year, there were a total of 209 complaints and 199 complaints having been handled and resolved respectively.

## **B7. ANTI-CORRUPTION**

The Group maintains and effectively implements a comprehensive system of internal control and stringent policies for anti-corruption, and is committed to preventing and monitoring any malpractices or unethical practice.

The Group is in compliance with all applicable anti-bribery and corruption laws including the Prevention of Bribery Ordinance (Chapter 201 of the Laws of Hong Kong) in Hong Kong as well as all the relevant anti-corruption laws in Singapore and China. The Group has also applied the Corporate Governance Code and Corporate Governance Report set out in Appendix 14 to the Main Board Listing Rules as the basis in formulating the internal rules and regulations for integrity discipline and clean administration. The Group will adhere to its corporate ethics and uphold its reputation to prevent corruption.

### **Preventive measures and whistle-blowing procedures**

To prevent corruptive practices and raise employees' awareness regarding such matter, the expectations and appropriate procedures of engaging third parties, and standards relating to anti-bribery and anti-corruption are included in the Employee Handbook.

The Employee Handbook covers definitions and requirements concerned with various topics, including but not limited to those related to:

- 1) Avoidance of conflict of interest and standards of integrity;
- 2) Non-disclosure of confidential information; and
- 3) Restrictions on the offer, solicitation or acceptance of advantages.

Employees, who were found breaching the Group's code and policies will be investigated and may be subject to warning, suspension, termination of contract, dismissal and disciplinary discharge.

In addition, "Whistle Blowing Policy" has been established to provide employees with guidance and channels for the reporting of fraud, corruption, bribery, criminal offences, conflict of interest and other non-compliances with the laws, regulations and internal controls or other forms of misconducts without fear of adverse consequences.

The policy provides a set of transparent and confidential procedures for dealing with the concerns raised by each employee and is fully supported by senior management, endorsed by the audit committee of the Company (the "Audit Committee") and approved by the Board.

Suspected non-compliance issues may be reported to the head of department who is also required to notify any concerns to the Audit Committee on a timely basis. According to this policy, the identities of employees who reported in good faith will be kept confidentially and protected by the Group without any form of retaliation, harassment or victimization.

During the Reporting Year, there were no violations of laws and regulations related to bribery, extortion, fraud and money laundering. The Group was not involved in any corruption litigation.

### **B8. COMMUNITY INVESTMENT**

The Group believes that running a successful business is about achieving economic viability and fulfilling social responsibility. Therefore, it strives to nurture a culture of care and mutual support amongst its employees and encourages them to participate in volunteer work. The Group will continue to review its policies and explore potential areas of contribution for community investment, sponsorship and donation activities.



**Great Wall Belt & Road Holdings Limited**  
**長城一帶一路控股有限公司**

Room 1602, 16/F.,  
COFCO Tower,  
262 Gloucester Road,  
Causeway Bay, Hong Kong

Tel: +852 2522 3800  
Fax: +852 2111 2665  
Web: [www.gwbrhk.com](http://www.gwbrhk.com)



**減廢證書**  
WastewiSe  
—Certificate—