ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

環 境

BoyleSports

社會及管治報告

FOOTBALL CLUB

# BIRMINGHAM SPORTS HOLDINGS LIMITED 伯明翰體育控股有限公司

(Incorporated in the Cayman Islands with limited liability) (於開曼群島註冊成立之有限公司) (Stock Code 股份代號: 2309)

CONTENTS	目錄	
OBJECTIVE OF THE REPORT	報告宗旨	2
STATEMENT FROM THE BOARD	董事會的意見	3
REPORTING PRINCIPLES	報告原則	3
STAKEHOLDER ENGAGEMENT	持份者參與	4
MATERIALITY MATRIX	重要性矩陣	5
FEEDBACK FOR THIS REPORT	對本報告的意見	6
ENVIRONMENTAL ASPECTS	環境方面	
EMISSIONS	排放	7
USE OF RESOURCES	資源使用	11
THE ENVIRONMENT AND NATURAL RESOURCES	環境及自然資源	13
CLIMATE CHANGE	氣候變化	13
SOCIAL ASPECTS	社會方面	
EMPLOYMENT	僱傭	13
HEALTH AND SAFETY	健康與安全	16
DEVELOPMENT AND TRAINING	發展及培訓	20
LABOUR STANDARDS	勞工準則	22
SUPPLY CHAIN MANAGEMENT	供應鏈管理	22
PRODUCT RESPONSIBILITY	產品責任	24
ANTI-CORRUPTION	反貪污	25
COMMUNITY INVESTMENT	社區投資	26

#### **OBJECTIVE OF THE REPORT**

Birmingham Sports Holdings Limited (the "Company") is pleased to present its Environmental, Social and Governance (hereinafter called "ESG") Report of the Company and its subsidiaries (the "Group") for the year ended 30 June 2021 ("Year 2021"), with an aim to provide details of the system establishment and performance of the Group in terms of sustainable development to both the internal and external stakeholders.

This report was prepared in accordance with the Environmental, Social and Governance Reporting Guide set out in Appendix 27 to the Rules Governing the Listing of Securities (the "Listing Rules") on The Stock Exchange of Hong Kong Limited (the "Stock Exchange"), highlights the environmental and social measures and activities of the Group during Year 2021. For the information on the corporate governance of the Group, please refer to the annual report of the Company for Year 2021.

The Company is engaged in investment holding. During Year 2021, the principal activities of the Group are (i) the operation of a professional football club, Birmingham City Football Club ("BCFC") in the United Kingdom (the "UK"); (ii) investment in properties; (iii) provision of lottery system and online payment system service solutions; and (iv) healthcare and medical related business.

In Year 2021, BCFC continued to compete in the English Football League ("EFL") Championship division, the second tier of the English football league system. It has a relatively high relevance to the environmental, social and governance aspects. Therefore, the disclosures in this report mainly focus on the policies and performance of BCFC in Year 2021 in relation to four environmental aspects and eight social aspects.

#### 報告宗旨

伯明翰體育控股有限公司(「本公司」) 欣然 提呈本公司及其附屬公司(「本集團」) 截至 2021年6月30日止年度(「2021年度」) 之環 境、社會及管治(下稱「環境、社會及管治」) 報告,旨在向內部及外部持份者提供本集團 於可持續發展方面之制度設立及表現之詳 情。

本報告根據香港聯合交易所有限公司(「聯交 所」)證券上市規則(「上市規則」)附錄二十七 所載之環境、社會及管治報告指引編製,重 點介紹本集團於2021年度期間之環境及社會 措施和活動。有關本集團企業管治方面之資 料,請參閱本公司2021年度之年報。

本公司從事投資控股。於2021年度期間,本 集團主要業務為(i)營運位於英國(「英國」)的 一家職業足球球會Birmingham City Football Club(「BCFC」);(ii)物業投資;(iii)提供彩票 系統及在線付款系統服務解決方案;及(iv)保 健及醫療相關業務。

於2021年度,BCFC繼續在英格蘭足球聯賽 (「英格蘭足球聯賽」)冠軍聯賽組別,即英 格蘭足球比賽體系中的第二級別聯賽中角 逐。BCFC與環境、社會及管治層面的相關 性較高。因此,本報告主要著重披露BCFC 於2021年度在四個環境方面及八個社會方面 的政策及表現。



#### STATEMENT FROM THE BOARD

The Board of Directors of the Company (the "Board") is committed to the long-term sustainability of the environment and communities in which the Group operates and continually enhances investment value to stakeholders through proper and effective internal control systems and ESG risk management measures throughout its operations. The Board considers ESG-related risks and opportunities as part of the Group's overall strategic formulation, and the significant ESG impact caused by daily operations and businesses. The Board maintains oversight of and approves the identification and assessment of ESG issues and confirms that to the best of its knowledge, this report addresses the material topics related to the operations of the Group and fairly presents its ESG performance and impacts.

The Board has appointed the Group's management to supervise the ESG-related issues and work of the Group. The Group's management is responsible for monitoring and reviewing the compliance with local laws and regulations with regards to ESGrelated issues. The management is also responsible for establishment of sustainability strategies, policies and measures to implement sustainability initiatives, provide sustainability reporting and prepare the ESG report.

#### **REPORTING PRINCIPLES**

This report is based on the following reporting principles:

#### Materiality

Materiality assessment process is carried out on a regular basis to (i) identify material ESG-related issues of the Group; and (ii) to collect and review the opinions of stakeholders to ensure that the performances and impacts of the key issues concerned by stakeholders are covered in this report.

#### Quantitative

Environmental and social key performance indicators ("KPIs") are disclosed in this report. The information of the standards, methodologies and source of conversion factors used for key emissions are stated in the report.

#### Balance

To ensure that a complete picture of the Group's sustainable development can be delivered to its stakeholders, the Group has disclosed its achievements, challenges ahead and rooms for improvement.

#### Consistency

In order to facilitate a meaningful comparison over time, the Group has adopted consistent disclosure and calculation methods in this report. For any changes to the methods or KPIs used, the Group has stated in corresponding sections.

#### 董事會的意見

本公司董事會(「董事會」)致力於本集團經營 所在地的環境及社區的長遠可持續發展,並 透過適當及有效的內部監控系統和環境、社 會及管治風險管理措施於整個營運過程中不 斷提升持份者的投資價值。董事會視環境、 社會及管治相關風險和機遇為本集團整體戰 略規劃的其中一環,而日常營運和業務活動 往往對環境、社會及管治構成重大影響。董 事會一直監察環境、社會及管治問題及批准 有關問題的識別和評估,並確認就其所知, 本報告涉及與本集團營運相關的重大議題, 並公平地呈現其環境、社會及管治表現和影 響。

董事會已委任本集團管理層監督本集團的環 境、社會及管治相關問題和工作。本集團管 理層負責監控和審查對當地有關環境、社會 及管治相關問題的法例和法規的遵守情況。 管理層亦負責建立可持續發展戰略、政策和 措施,以實施可持續發展舉措、提供可持續 發展報告和編備環境、社會及管治報告。

#### 報告原則

本報告以下列報告原則為基準:

#### 重要性

定期進行重要性評估過程以(i)識別本集團的 重大環境、社會及管治相關問題:及(ii)收集 和審查持份者的意見,確保本報告已涵蓋持 份者所關注的關鍵問題的表現和影響。

#### 量化

本報告已披露環境和社會關鍵績效指標(「關 鍵績效指標」)。報告中載述關鍵排放物所使 用的標準、方法和轉換系數來源等信息。

#### 平衡

為確保可向持份者提供本集團可持續發展的 完整情況,本集團已披露其成就、未來的挑 戰和改進的空間。

#### 一致性

為方便於不同時期進行有意義的比較,本集 團於本報告中已採用一致的披露和計算方 法。對於所使用方法或關鍵績效指標的任何 變動,本集團已於相應章節中載述。

#### STAKEHOLDER ENGAGEMENT

The Group is committed to maintaining the sustainable development of its businesses and providing support to environmental protection and the community in which it operates. The Group maintains a close tie with its stakeholders, including government, investors, fans and customers, employees, business partners, community and the public, and strives to balance their opinions and interests through constructive communications in order to determine the directions of its sustainable development. The Board is responsible for assessing and determining its environmental, social and governance risks, and ensuring that the relevant risk management and internal control systems are operating properly and effectively.

#### 持份者參與

本集團致力維持業務的可持續發展,並為環 保及業務所在的社區提供支持。本集團與 政府、投資者、球迷及客戶、僱員、業務夥 伴、社區及公眾人士等持份者保持密切聯 繫,力求透過建設性交流平衡意見與利益, 從而確定其可持續發展方向。董事會負責評 估及釐定其環境、社會及管治風險,確保相 關風險管理及內部控制制度妥善及有效地運 行。

<b>Stakeholders</b> 持份者	Expectations and requirements 期望及要求	Communication and response 溝通及回應
Government 政府	<ul> <li>Operate in compliance with the laws 營運時遵守法例</li> <li>Tax payment in accordance with the laws 按照法例繳付税項</li> </ul>	<ul> <li>Law-abiding operations 守法經營</li> <li>Tax payment on time and in full 準時及悉數繳付税項</li> </ul>
Investors 投資者	<ul> <li>Implement corporate governance and create value 實行企業管治並創造價值</li> <li>Information disclosure 披露資料</li> </ul>	<ul> <li>Optimise internal control and risk management 盡力改善內部監控及風險管理</li> <li>Release operating data in due course 適時公佈營運數據</li> </ul>
Fans and customers 球迷及客戶	<ul> <li>Attend football matches on match days 於比賽日到場觀看足球比賽</li> <li>Quality of products and services 產品及服務質素</li> <li>Food and drink on match days 比賽日的食品及飲品</li> </ul>	<ul> <li>Ticket office outlets and online ticket office 售票處及購票網</li> <li>Social media platforms and refund policy 社交媒體平台及退款政策</li> <li>An excellent range of food will be available throughout the food outlets on match days 食肆於比賽日提供各式食品</li> </ul>
Employees 僱員	<ul> <li>Career development platform 事業發展平台</li> <li>Remuneration and benefits 薪酬及福利</li> <li>Occupational health and safety 職業健康及安全</li> </ul>	<ul> <li>Transparent promotion channel 具透明度的晉升渠道</li> <li>Competitive remuneration package 具競爭力的薪酬方案</li> <li>Implement health and safety management system 實施健康及安全管理系統</li> </ul>

持份者參與(續)

Stakeholders 持份者	Expectations and requirements 期望及要求	Communication and response 溝通及回應		
Business partners 業務夥伴	<ul> <li>Win-win cooperation 雙贏合作</li> <li>Business ethics and credit standing 商業道德及信用狀況</li> </ul>	<ul> <li>Sponsorship packages 贊助方案</li> <li>Fulfilment of obligations under any contract in accordance with the laws 按照法例履行任何合約項下的責任</li> </ul>		
Community and the public 社區及公眾人士	• Make a career in football 創立足球事業	<ul> <li>BCFC Community Trust provides full- time football and education programme BCFC 社區信託提供全日制足球暨教育 課程</li> </ul>		
	<ul> <li>Support social welfare 支援社會福利</li> <li>Protect the nature 保護大自然</li> </ul>	<ul> <li>Participate in charity works 參與慈善工作</li> <li>Adhere to green operations 恪守綠色營運</li> </ul>		
ΜΑΤΕΡΙΑΙ ΙΤΥ ΜΑΤΡΙΥ		重要性铂随		

#### **STAKEHOLDER ENGAGEMENT** (Continued)

#### 重要性矩陣

於2021年度,本集團對多項環境、社會及管 治事宜進行重要性評估,以找出對本集團業 務最重要及持份者最關注的事宜。該評估有 助本集團確保其業務發展能符合持份者的期 望及要求。本集團已找出22項涵蓋環境、社 會及營運的環境、社會及管治事宜,並邀請 內部及外部持份者透過評分工具及面談,評 估環境、社會及管治事宜的重要性。本集團 管理層已審閱環境、社會及管治事宜的重要 性級別,並於本報告披露。

#### MATERIALITY MATRIX

In Year 2021, the Group carried out materiality assessment on a number of ESG issues in order to identify which issues were crucial to the Group's business and were of the utmost concern to stakeholders. It helps the Group to ensure its business development can meet the expectations and requirements of stakeholders. The Group has identified 22 ESG issues covering environmental, social and operation and invited both internal and external stakeholders to assess the materiality of the ESG issues through a scoring tool and interviews. The Group's management has reviewed the ranking of materiality of the ESG issues and then disclosed them in this report.

### **MATERIALITY MATRIX** (Continued)

The Group's materiality matrix of ESG issues in Year 2021:

#### 重要性矩陣(續)

2021年度本集團環境、社會及管治事宜的重 要性矩陣:



#### Materiality Matrix of Year 2021 2021年度的重要性矩陣

#### **Environmental issues** Social issues **Operation issues** 環境事宜 社會事宜 營運事宜 1. Greenhouse gas emissions 9. Local community engagement 17. Economic value generated 溫室氣體排放 當地社區參與 所產生的經濟價值 2. Energy consumption 10. Community investment 18. Corporate governance 能源消耗 社區投資 企業管治 3. Water consumption 11. Occupational health and safety 用水 職業健康與安全 反貪污 4. Waste 12. Labour standards in supply 廢物 chain 供應鏈管理 5. Saving energy measures 供應鏈內的勞工標準 13. Development and training 節約能源措施 客戶滿意度 6. Impact of climate change 發展及培訓 22. Customer privacy 氣候變化的影響 14. Employee welfare 客戶私隱

僱員福利

15. Inclusion and equal

包容及平等機會

opportunities

- 7. Customer engagement in environmental issues 客戶對環境事宜的參與
- 8. Use of chemicals 使用化學品

## 16. Talent attraction and retention 吸納及挽留人才

19. Anti-corruption

- 20. Supply chain management
- 21. Customer satisfaction

## FEEDBACK FOR THIS REPORT

The Group welcomes feedback and suggestions on this report. If you have any questions or suggestions on this report and its contents, please contact us at esg@bihl.com.hk.

#### 對本報告的意見

集團歡迎對本報告提出意見及建議。如 閣下 對本報告及其內容有任何疑問或建議,請與 我們聯絡:esg@bihl.com.hk。

#### **ENVIRONMENTAL ASPECTS**

### EMISSIONS

The home ground of BCFC is St. Andrew's Trillion Trophy Stadium (the "Stadium"), an association football stadium in the Bordesley district of Birmingham, the UK. The office of BCFC is also located in the Stadium. Besides, The Birmingham City Football Academy ("BCFC Academy") is located at the Trillion Trophy Training Centre (the "Training Ground"), BCFC Academy aims to provide a place to pursue and achieve success through a first class coaching environment for all the young players registered in its system, and to develop players who are able to meet the criteria for first team squad professional players at BCFC.

Fuels consumed by the BCFC's motor vehicles are the main sources of nitrogen oxides (NO<sub>x</sub>), sulphur oxides (SO<sub>x</sub>) and particulate matter (PM) emissions. Additionally, gas is used during the operations of the boiling system, restaurants and catering services at the Stadium and the Training Ground, and the under-soil heating system which heats the underside of the pitch of the Stadium in withstanding any elements from bad weather, such as snow and ice. Fuel consumption of motor vehicles could generate greenhouse gases ("GHG") such as carbon dioxide (CO<sub>2</sub>), methane and nitrous oxide.

BCFC encourages walking, the use of cycle, public transport, car sharing and coach in order to reduce pollution emissions. Besides, BCFC ensures all its suppliers deliver excellent environmental, social and ethical management practices. Electricity is used during the operations of the lighting system, heaters and air-conditioners, and all other electrical devices such as computers, printers, televisions used at the Stadium and the Training Ground.

BCFC has a team of cleaners on site to deal with day-to-day hygiene function at the Stadium and the Training Ground. Cleaners are responsible for ensuring that all areas are cleaned at night after the staff have left. On match day in which BCFC hosts home game at the Stadium, a pre-cleaning will be arranged by BCFC before the match. Cleaning continues throughout the match and during half time of the match. After the match, a large team of cleaners will be arranged to ensure all areas of the Stadium are cleaned before commencement of next match. All the waste collected is put into the euro bins and will be collected by a professional company.

BCFC hires a waste management company to handle BCFC's waste collection and recycling. All waste is put into skips which are collected by the waste management company and processed at their base for recyclable waste and non-recyclable waste. For electrical items or batteries to be disposed of, BCFC would use a separate skip provided by a waste management company for subsequent special treatment. No direct discharges of waste into water or land from the Stadium and the Training Ground were made in Year 2021.

## 環境方面

## 排放

BCFC的主場球場位於英國伯明翰市 Bordesley區的一個協會足球場聖安德魯斯 球場 (St. Andrew's Trillion Trophy Stadium) (「球場」)。BCFC的辦事處亦設於球場內。 此外,伯明翰城足球學院(「BCFC學院」)位 於Trillion Trophy訓練場(「訓練場」),BCFC 學院旨在透過頂級的訓練環境為所有在其系 統中註冊的年輕球員提供一個追求並實現成 功的地方,並培養能夠達到BCFC主隊專業 標準的球員。

BCFC汽車消耗的燃料是氮氧化物(NO<sub>x</sub>)、硫 氧化物(SO<sub>x</sub>)及懸浮粒子(PM)排放的主要來 源。此外,球場及訓練場營運的煮沸系統、 餐廳及餐飲服務,以及為球場草地加熱以應 付下雪及結冰等惡劣天氣的地下加熱系統需 耗用燃氣。汽車消耗燃料時會產生二氧化碳 (CO<sub>2</sub>)、甲烷及一氧化氮等溫室氣體(「溫室 氣體」)。

BCFC鼓勵步行、使用腳踏車、公共交通工 具、汽車共享及旅遊巴士等,以減少污染物 排放。此外,BCFC確保其所有供應商提供 卓越的環境、社會及道德管理措施。電力用 於球場及訓練場營運所使用的照明系統、加 熱器及空調設備,以及所有其他電器,如電 腦、打印機及電視機等。

BCFC在球場駐有一組保潔團隊,負責在球 場及訓練場內處理日常衛生。保潔人員負責 確保在工作人員離開後在夜間清潔所有區 域。在每個BCFC於球場舉行主場比賽之比 賽日,BCFC會安排在賽前提前進行清潔。 在整場賽事過程中及比賽中場均會持續進行 清潔。比賽結束後,BCFC將安排更多的保 潔人員,以確保在下場賽事舉行之前球場所 有區域均得到清理。所有收集的廢物將集中 於輪式垃圾桶內,並將由專業公司收集。

BCFC聘請廢物管理公司處理BCFC的廢物收 集及回收再用。所有廢物均投入吊斗,並由 廢物管理公司收集及於其處理中心內按可回 收及不可回收的廢物進行分類處理。就需棄 置的電子物品或電池而言,BCFC會使用一 間廢物管理公司另行提供的吊斗以安排其後 的特殊處理。於2021年度內,球場及訓練場 並無直接排放廢物至水資源或土地中。

#### **EMISSIONS** (Continued)

BCFC strictly regulates the operation of its business to ensure the compliance with national and local laws and regulations relating to environmental protection and pollutant emissions. In Year 2021, there was no case of material non-compliance with the Climate Change Act 2008 and other relevant laws and regulations relating to air and greenhouse gas emissions, discharges into water and land, and generation of hazardous and non-hazardous waste that have a significant impact on environment. In addition, there was no report of significant fines or sanctions as a result of non-compliance with the relevant laws and regulations in Year 2021.

The key environmental performance indicators of the Group's emissions in Year 2021 are shown in the table below:

#### 環境方面(續)

#### 排放(續)

BCFC嚴格規管其業務的營運,確保遵守與 環保及污染物排放有關的國家及地方法律及 法規。於2021年度,概無嚴重違反《2008年 氣候變遷法》及有關廢氣及溫室氣體排放、 向水資源及土地排放污物以及產生對環境造 成重大影響的有害及無害廢物的其他相關法 律及法規的行為。此外,於2021年度內,並 無因違反相關法律及法規而招致重大罰款或 制裁的報告。

於2021年度,本集團排放物的關鍵環境績效 指標載列於下表:

Environmental indicators	環境指標	<b>Unit</b> 單位	<b>Year 2021</b> 2021年度	<b>Year 2020</b> 2020年度
Air emissions (Note 1)	廢氣排放《 <sup>附註1)</sup>			
Nitrogen oxides (NO <sub>x</sub> ) emissions	氮氧化物(NO <sub>x</sub> )排放	kg ✓ ±	636	672
Sulphur oxides (SO <sub>x</sub> ) emissions	硫氧化物(SO <sub>x</sub> )排放	千克 kg 千克	2	2
Particulate matter (PM) emissions	懸浮粒子(PM)排放	一兄 kg 千克	10	15
GHG emissions	溫室氣體排放			
Total GHG emissions (Note 2)	溫室氣體排放總量 <sup>(附註2)</sup>	kg CO₂₀ 二氧化碳當量(千克)	1,049,739	1,285,242
GHG emissions intensity (Note 3)	溫室氣體排放密度 <sup>(附註3)</sup>	kg CO <sub>2e</sub> (per employee located in the UK) 二氧化碳當量(千克) (每名位於英國之僱員)	3,559	1,773
Direct emissions (Scope 1)	直接排放 <i>(範圍1)</i>	(每石位於英國之催頁) kg CO <sub>2e</sub> 二氧化碳當量(千克)	31,452	62,232
Indirect emissions (Scope 2) (Note 4)	間接排放 <i>(範圍2)<sup>(附註4)</sup></i>	→ 和記版出並(十九) kg CO <sub>2e</sub> 二氧化碳當量(千克)	983,043	1,177,193
Other indirect emissions (Scope 3)	其他間接排放 <i>(範圍3)</i>	二氧化碳當量(千九) kg CO <sub>2e</sub> 二氧化碳當量(千克)	35,244	45,817
Waste	廢棄物			
Total non-hazardous waste produced	所產生無害廢棄物總量	Tonnes 噸	115,700	164,150
Non-hazardous waste produced intensity (Note 3)	所產生無害廢棄物密度 <sup>(附註3)</sup>	Tonnes (per employee located in the UK) 噸	393	226
		(每名位於英國之僱員)		
Total hazardous waste produced (Note 5)	所產生有害廢棄物總量 <sup>(附註5)</sup>	Tonnes 噸	N/A 不適用	N/A 不適用
Hazardous waste produced intensity	所產生有害廢棄物密度	Figure 7 Tonnes (per employee located in the UK) 噸 (每名位於英國之僱員)	N/A 不適用	N/A 不適用

## 8

ENVIRONMENTAL ASPECTS (Continued)		環境方面	<b>環境方面</b> (續)		
EMISS	IONS (Con	tinued)	排放(續)		
Note 1:	consumpt in accore	sions include emissions data from gaseous fuel ion and motor vehicles. The figures are calculated dance with Appendix 2: Reporting Guidance on ental KPIs published by the Stock Exchange.	附註1:	廢氣排放包括來自燃氣消耗及汽車的 排放數據。有關數字乃根據聯交所發 佈的附錄二:環境關鍵績效指標匯報 指引計算。	
Note 2:		ssions can be divided into three separate areas (i) indirect; and (iii) other indirect emissions as follows:	附註2:	<ul> <li>註2: 溫室氣體排放可分為三個獨立範圍:</li> <li>(i)直接:(ii)間接:及(iii)其他間接排放, 載列如下:</li> </ul>	
	Scope 1:	Direct GHG emissions from operations that are owned or controlled by BCFC including GHG emissions from vehicles controlled by BCFC.		範圍1:	由BCFC所擁有或控制的業 務直接產生的溫室氣體排 放,包括來自BCFC所控制 的汽車的溫室氣體排放。
	Scope 2:	Indirect GHG emissions resulting from purchased electricity and gas consumption by BCFC.		範圍2:	來自BCFC購買電力及消耗 燃氣間接產生的溫室氣體 排放。
	Scope 3:	Other indirect GHG emissions include emission from paper waste disposed at landfills and emissions from electricity consumption for processing fresh water and sewage by BCFC.		範圍3:	其他間接溫室氣體排放, 包括來自棄置於堆填區的 廢紙的排放及來自BCFC於 處理淡水及污水所耗電力 的排放。
	-	es are calculated in accordance with Appendix 2: Guidance on Environmental KPIs published by the hange.			乃根據聯交所發佈的附錄 關鍵績效指標匯報指引計算。
Note 3:		ease in intensity in Year 2021 is mainly due to a t reduction in the number of staff, in particular, y staff.	附註3:	<i>附註3:</i> 2021年的密度增加主要是由於員工數 目大幅減少,特別是臨時員工。	
Note 4:		sion factor of electricity consumed is sourced from	附註 4:		放系數來自UK Government

the UK Government Greenhouse Gas Conversion Factors for Company Reporting.

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*Note 5:* Hazardous wastes produced by BCFC, which are mainly office electronic wastes, are minimal and no relevant figure is quantified. In the event when any hazardous waste is to be disposed of, BCFC would engage professional companies to handle it.

The coronavirus disease 2019 ("COVID-19") pandemic caused the UK lockdown and public health and social restrictions. Due to the requirement of games playing behind closed doors and temporary interruption of operation of the Stadium and the Training Ground during Year 2021, GHG emissions and the volume of non-hazardous waste have decreased significantly.

The target of BCFC is to reduce the emissions by 3-10% in 5 years (2022 - 2026) and maintain minimal generation of hazardous waste. BCFC aims to reduce non-hazardous waste by 3-10% by 2026 from 2019 baseline.

- 附註 4: 耗電的排放系數來自UK Government Greenhouse Gas Conversion Factors for Company Reporting。
- 附註 5: BCFC產生的有害廢棄物主要是辦公 室電子廢物,數量極少及無相關量 化數字。於處理任何有害廢棄物時, BCFC會委聘專業公司進行處理。

2019年冠狀病毒病(「COVID-19」)大流行導 致英國封城、公共衛生和社交限制。由於在 2021年度期間需要閉門比賽和暫時中斷球場 和訓練場的運作,溫室氣體排放及無害廢棄 物的數量大幅減少。

BCFC的目標是於5年內(2022年-2026年) 將排放量減少3-10%,並保持產生最少的有 害廢棄物。BCFC的目標是於2026年前根據 2019年的基線將無害廢棄物減少3-10%。

#### EMISSIONS (Continued)

The Group has adopted a series of emission reduction measures to achieve the targets set. Details of measures to mitigate emissions, management of wastes and result achieved are set out as below:

- Sensors are installed in energy efficient heaters and most of the toilet lights in the Stadium which will be switched off if movement has not been detected for half an hour or on if movement is detected;
- BCFC provides different trash bins for recyclable wastes, non-recyclable wastes and non-hazardous wastes; and
- BCFC has hired a waste management company to calculate waste to landfill since August 2018. The average landfill diversion for Year 2021 is approximately 90%.

In the future, BCFC will continue its strict compliance with laws and regulations and formulate strategies to achieve the target goals.

#### 環境方面(續)

#### 排放(續)

本集團已採納一系列減少排放措施以達致所 設定的目標。減少排放的措施、廢物管理及 所取得成果的詳情載列如下:

- 球場的節能加熱器和大部分洗手間的電燈已安裝傳感器,倘於半小時並無偵測到物體移動則會關閉或倘偵測到物體移動則會開啟。
- BCFC為可回收廢棄物、不可回收廢棄物 和無害廢棄物提供不同的垃圾桶;及
- BCFC自2018年8月起聘請一間廢物管理 公司計算運往堆填區的廢物。於2021年 度的平均堆填區分流率約為90%。

於將來,BCFC將繼續嚴格遵守法律及法 規,並制定策略以實現目標。



## USE OF RESOURCES

BCFC is committed to minimise the impact of business activities on the environment, and support environmental protection programmes. In particular, a number of initiatives designed to conserve resources were introduced to promote employees' awareness of the need to achieve efficient utilisation of resources.

The major use of resources of the Stadium and the Training Ground were electricity, gas and water consumptions. The total units of purchased electricity, diesel, petrol, gas and water consumed by the Group's emissions in Year 2021 are shown in the table below:

#### 環境方面(續)

#### 資源使用

BCFC致力盡量減少商業活動對環境的影響,並支持環保活動。尤其是推出多項旨在 節省資源的措施,以提升員工對有效使用資 源的意識。

球場及訓練場主要使用的資源為電力、燃氣 及用水。於2021年度,本集團耗用所購買的 電力、柴油、汽油、燃氣及用水總量載列於 下表:

Use of resources	資源使用	<b>Unit</b> 單位	<b>Year 2021</b> 2021年度	<b>Year 2020</b> 2020年度
Units of purchased electricity consumed	購買電力用量	kWh	2,283,735	2,544,828
Units of purchased diesel consumed	購買柴油用量	千瓦時 kWh 千瓦時	115,435	224,056
Units of purchased petrol consumed	購買汽油用量	→ 瓦吋 kWh 千瓦時	7,666	21,072
Units of purchased gas consumed	購買燃氣用量	kWh 千瓦時	2,508,526	2,186,466
Total energy consumption	能源消耗總量	kWh 千瓦時	4,915,362	4,976,422
Total energy consumption intensity	能源消耗密度總量	kWh (per employee located in the UK) 千瓦時 (每名位於 英國之僱員)	16,663	6,864
Amount of water consumption	用水量	m³ 立方米	33,000	33,815
Water consumption intensity	用水密度	m <sup>3</sup> (per employee located in the UK) 立方米(每名位於 英國之僱員)	112	47
Packaging material consumption (Note 1)	包裝物料消耗 <sup>(附註1)</sup>			
Total packaging material (paper) used for finished products	製成品所用包裝物料 (紙)總量	kg 千克	N/A 不適用	42
Total packaging material (plastic) used for finished products	製成品所用包裝物料 (塑膠)總量	kg 千克	N/A 不適用	789
Total units produced	產品單位總量	Unit 件	N/A 不適用	84,615
Amount of packaging material (paper) per unit produced	每件產品所用包裝物料 (紙)數量	kg 千克	N/A 不適用	0.0005
Amount of packaging material (plastic) per unit produced	每件產品所用包裝物料 (塑膠)數量	kg 千克	N/A 不適用	0.0093

Note 1: Packaging materials were used for merchandise of Blues Store which was operated by BCFC during the year ended 30 June 2020 ("Year 2020"). Blues Store was closed during the period from July to September 2020 due to lockdown and it has no longer been operated by BCFC since October 2020. Therefore, no packaging material was consumed by BCFC in Year 2021.

 附註1:
 於截至2020年6月30日止年度(「2020

 年度」)期間,BCFC經營的Blues

 Store的商品使用包裝材料。由於封

 城,Blues

 Store已於2020年7月至9

 月期間關閉,而BCFC自2020年10月

 起已不再經營Blues

 Store。因此,

 BCFC於2021年度並無消耗包裝材料。

## USE OF RESOURCES (Continued)

BCFC has installed energy efficient heaters throughout the Stadium. These energy efficient heaters have installed sensors and will switch off automatically if movement has not been detected for half an hour and thus cutting down energy use. Furthermore, BCFC has also installed sensors to most of the toilet lights in the Stadium, which means that the lights will only be switched on if movement is detected. BCFC continued to drive efforts in energy saving and emission reduction in Year 2021. Light emitting diode (LED) lightings are widely used in the workplace areas of the Stadium. Water is used in the operation of irrigation systems, restaurants and catering services, washroom at the Stadium and the Training Ground.

BCFC actively minimises the significant impact the club potentially has on the environment. It seeks opportunities to reduce and recycle resources that have consumed in order to minimise the amount of waste generated to the environment. BCFC has established Environmental Policy to raise the awareness of staff for improving the energy and environmental performance in the offices.

BCFC acknowledges that its business activities have impact to the environment. BCFC prides itself on being environmentally friendly and it strives to enhance and improve its policies for pollution prevention constantly.

For energy consumption, BCFC has set a mid to long-term goal to reduce use of energy by 3-10% in 5 years (2022 - 2026). For consumption of water, during Year 2021, BCFC did not encounter any problem in sourcing water that was fit for its purpose. Going forward, BCFC has set a mid to long-term goal to reduce use of water by 3-10% in 5 years (2022 - 2026).

BCFC has currently performed the following measures to improve efficiency of use of resources and achieve the target goals:

- LED lightings are widely used in the workplace areas of the Stadium, which can reduce electricity consumption as compared with incandescent bulbs. LED can reduce over approximately 75% energy used compared with incandescent lighting;
- BCFC has a pool that collects rain water at the Training Ground. Rain water is then fed into the irrigation systems so that consumption of mains water is reduced; and
- Adopted higher energy-efficiency office equipment in workplace.

## 環境方面(續) 資源使用(續)

BCFC已在整個球場內安裝節能加熱器。該 等節能加熱器設有傳感器,若半小時內未檢 測到物體移動,將會自動關閉,從而減少能 源耗用。此外,BCFC亦在球場的大部份洗 手間電燈上安裝傳感器,如此,照明只有在 檢測到物體移動時才會開啟。於2021年度 內,BCFC繼續推進節能減排工作。球場的 工作區域內廣泛使用發光二極管(LED)燈具。 水資源用於球場及訓練場內灌溉系統、餐廳 及餐飲服務及洗手間的運作。

BCFC積極將球會對環境的潛在重大影響減 至最低,尋求減少及回收消耗資源的機會, 以盡量減少所產生影響環境的廢物數量。 BCFC制定了環境政策以提高員工對改善辦 公室能源及環境表現的意識。

BCFC認同其商業活動對環境帶來影響。 BCFC以作為環保企業為榮,並不斷努力優 化及完善其污染防治政策。

就能源消耗而言,BCFC已制定中長線目標,於5年內(2022年 – 2026年)將能源使 用量減少3-10%。就用水而言,於2021年度 期間,BCFC於取得合適用途的水源方面並 無遇到任何問題。展望未來,BCFC已制定 中長線目標,於5年內(2022年 – 2026年) 將用水量減少3-10%。

BCFC目前已實行下列措施以改善資源使用 效益及達致目標:

- 球場的工作區域內已廣泛使用LED燈具, 其與白熾燈泡相比可減少耗電量。與白 熾燈相比,LED可減少約75%電力使用;
- BCFC於訓練場設有一個收集雨水的水 池。雨水其後注入灌溉系統,從而減少 自來水消耗量;及
- 於工作場所採用較高能源效益的辦公室 設備。

#### THE ENVIRONMENT AND NATURAL RESOURCES

BCFC aims to conserve natural resources and is concerned with the environmental impact of its activities. In addition to the aforesaid measures, the Group also monitors the environmental impact of its operations, enhances staff awareness to ensure that the aforesaid measures can be implemented effectively.

#### CLIMATE CHANGE

Awareness over climate change continues to grow and is one of the most discussed topics among companies. BCFC is no exception, having increasing concerns over the potential impact from climate change on BCFC's business and operation. BCFC regularly reviews global and local government policies, regulatory updates and market trends to identify potential climate-related risks which may have impact on BCFC's business operation.

In accordance to the reporting framework developed by the Task Force on Climate-related Financial Disclosures, there are two major categories of climate-related risks, physical and transition risks. Climate change can pose threats to BCFC such as business disruption, physical damage and rise in operational costs due to increase in frequency and magnitude of severe and extreme weather events. BCFC has insurance policies in place to mitigate such risks. In addition, BCFC will immediately develop a response plan such as changing the business strategy and modifying the development plan in order to reduce the negative impacts of the risks on BCFC.

BCFC will continuously incorporate sustainable practices in its business operations and prepare and maintain sufficient resources for managing identified climate-related risks and studying the potential remediation measures.

## SOCIAL ASPECTS

## EMPLOYMENT

BCFC emphasises on developing human resources and providing competitive remuneration and welfare packages. Promotion opportunities and salary adjustments are benchmarked against individual performance. Employees are entitled to benefits such as annual leave, sick leave, statutory sick pay, sickness absence, maternity leave, paternity leave, shared parental leave and other absences and leave as mentioned in the staff handbook of BCFC.

BCFC is an equal opportunities employer and deplores any kind of discrimination amongst colleagues, job candidates, customers or associates. BCFC has established Equal Opportunities Policy which is a statement of intent derived from these values. BCFC provides equal opportunities for all employees. BCFC also takes every action possible to avoid discrimination on the grounds of sex, age, sexual orientation, race, ethnic, origin, religious or philosophical, beliefs or disability.

## 環境方面(續)

## 環境及自然資源

BCFC以保護自然資源為目標,並關注其活動對環境的影響。除上述措施外,本集團亦 監測其營運對環境的影響,提高員工的意識,以確保上述措施能夠有效實施。

#### 氣候變化

對氣候變化的認識不斷提高,是公司之間 最熱門討論的話題之一。BCFC亦不例外, 日益關注氣候變化對BCFC業務和營運的潛 在影響。BCFC定期檢討全球和地方政府政 策、最新的監管制度和市場趨勢,以確定可 能對BCFC業務營運造成影響的潛在氣候相 關風險。

根據氣候相關財務揭露工作小組(Task Force on Climate-related Financial Disclosures)制 定的報告框架,氣候相關風險主要有兩大 類,即實體風險和過渡風險。氣候變化可能 會對BCFC造成威脅,例如業務中斷、實質 損害及由於嚴重和極端天氣事件的頻率和規 模增加而導致經營成本上升。BCFC已購買 保險以減輕相關風險。此外,BCFC將隨即 制定應對計劃,例如改變業務戰略和修訂發 展計劃,以減少風險對BCFC的負面影響。

BCFC將在其業務營運中不斷加入可持續發展方法,並準備和保持足夠的資源管理已識別的氣候相關風險及研究潛在補救措施。

## 社會方面 *僱傭*

BCFC強調培養人力資源,及提供有競爭力 的薪酬福利待遇。晉升機會及薪資調整乃根 據個人表現為基準。僱員可享受BCFC員工 手冊中所述的年假、病假、法定病假工資、 因病缺勤、產假、侍產假、育兒假及其他缺 勤及休假等福利。

BCFC是平等機會僱主,強烈反對同事、求 職者、客戶或夥伴之間的任何類型歧視。 BCFC已建立平等機會政策,此乃源於該等 價值觀的意向聲明。BCFC為全體僱員提供 平等機會,並採取一切可能的行動,避免 基於性別、年齡、性取向、種族、族裔、血 統、宗教、哲學、信仰或殘疾的歧視。

#### **EMPLOYMENT** (Continued)

**社會方面**(續) **僱傭**(續) BCFC於2021年度期間的員工組成如下:

The compositions of BCFC's workforce during Year 2021 are stated as follows:



**By age group** 按年齡組別劃分





By geographical region 按地區劃分



SOCIAL ASPECTS (Continued)		社會方面(續)	
EMPLOYMENT (Continued)		<b>僱傭</b> (續)	
BCFC's employee turnover rate during Year 2021 follows (Note 1):	are stated as	BCFC於2021年度期間的僱員 下 <sup>(附註1)</sup> :	員流失比率如
	Year 2021		2021年度
Turnover rate by gender		按性別劃分的流失比率	
Male	8%	男性	8%
Female	12%	女性	12%
Turnover rate by age group		按年齡組別劃分的流失比率	
Under 30 years old	14%	30歲以下	14%
30-50 years old	8%	30至50歲	8%
Over 50 years old	3%	50歲以上	3%
Turnover rate by geographical region		按地區劃分的流失比率	
UK	9%	英國	9%
Other	-	其他	-
Note 1: The employee turnover rate is calculated based	I on the number	<i>附註1:</i> 僱員流失比率乃根據與	期內各類別離職

*Note 1:* The employee turnover rate is calculated based on the number of employees who left employment in each category during the period divided by the average number of employees in that category.

BCFC aims to achieve an environment in which everyone feels free to contribute to the organisation and to maximise its potential without unfair obstruction. Its Equal Opportunities Policy is the policy to ensure that all existing and potential employees, customers or any associates of BCFC receive equal consideration, and experience no discrimination, harassment or less favourable treatment either directly or indirectly. BCFC is committed to the elimination of unlawful or unfair discrimination on the grounds of any protected characteristics.

It is impossible for BCFC to apply the principles of equal opportunities to the recruitment of players since this depends largely upon the personal and professional judgement of the football team manager. In the recruitment of non-playing staff, BCFC uses its best endeavours to monitor all decisions made to ensure that they are consistent with the Equal Opportunities Policy.

BCFC is one of the employers in the UK who has signed up to the Disability Confident scheme which aims to encourage employers to make the most of the opportunities in employing disabled people.

BCFC旨在打造讓每名僱員都可以自由地為 公司作貢獻,並在沒有不公平障礙的情況下 發揮其最大潛力的環境。其平等機會政策 乃確保BCFC所有現有僱員及準僱員、客戶 或任何夥伴享有同等待遇的政策,而不會 直接或間接遭受歧視、騷擾或不公平待遇。 BCFC致力在任何受保護的特性基礎上消除 非法或不公平歧視。

數得出。

僱員的人數除以該類別的平均僱員人

由於招聘球員很大程度上取決於足球領隊 的個人及專業判斷,因此,BCFC不可能應 用平等機會原則。在招聘非球員員工方面, BCFC盡最大努力監督所有決定,確保彼等 符合平等機會政策。

BCFC是其中一名在英國已參與殘疾自信計 劃的僱主,該計劃旨在鼓勵僱主給予更多機 會僱用殘疾人士。

#### EMPLOYMENT (Continued)

BCFC strictly regulates the operation of its business to ensure the compliance with national and local laws and regulations relating to employment during the course of operation. In Year 2021, there was no case of material non-compliance with the Equality Act 2010, Disability Confident scheme and the relevant laws and regulations relating to compensation and dismissal, recruitment and promotion, working hours, rest periods, equal opportunity, diversity, anti-discrimination and other benefits and welfare on BCFC. In addition, there was no report of significant fines or sanctions as a result of non-compliance with the relevant laws and regulations in Year 2021.

### HEALTH AND SAFETY

BCFC has in place the Health and Safety Policy. This is the policy formulated by the management of BCFC, the aim of which is to do all that is reasonably practicable to prevent personal injury and damage to property and to protect everyone, including the public, in so far as they come into contact with BCFC or its activities, from any foreseeable hazard and danger and to detail the specific responsibilities of all department heads and directors.

BCFC recognises its responsibilities (i) to provide and maintain safe and healthy working conditions; (ii) to provide training and instruction to enable employees to perform their work safely; (iii) to maintain a continuing and progressive interest in health and safety; (iv) to take into account all statutory requirements for health and safety; (v) to consult and involve employees in health and safety matters wherever possible; and (vi) to the public, visitors and contractors.

The management of BCFC also recognises that its employees have a duty to co-operate in implementation of the Health and Safety Policy by (i) working safely; (ii) meeting their statutory duties; (iii) reporting incidents that have led or may lead to injury or damage; and (iv) following the Health and Safety Procedures and safe systems of work.

The management of BCFC has a duty under Section 2(1) of the Health and Safety at Work Act 1974 ("Health and Safety Law") of the UK, so far as is reasonably practicable, to look after health, safety and welfare of all its employees and any other person who may be affected by the work activities.

Every employee working for BCFC has a duty of care under Section 7 of the Health and Safety Law to take reasonable care of himself or herself and any other person who may be affected by employee's actions or omissions.

#### 社會方面(續)

#### **僱傭**(續)

BCFC嚴格規管其業務的營運,以確保於營 運過程中遵守與僱傭相關的國家及地方法律 及法規。於2021年度,BCFC概無嚴重違反 《2010年平等法》、殘疾自信計劃及與補償及 解聘、招聘及晉升、工作時間、休息時間、 平等機會、多元化、反歧視及其他利益和福 利有關的相關法律及法規的行為。此外,於 2021年度內,並無因違反相關法律及法規而 招致重大罰款或制裁的報告。

#### 健康與安全

BCFC已設有健康與安全政策。BCFC管理層 制定該政策,旨在於合理可行之情況下盡一 切所能防止人身傷害及財產損失,並保護包 括公眾在內的所有人在與BCFC聯繫及參與 其活動時免受任何可預見的危害及危險,以 及詳細説明所有部門主管及總監的具體職 責。

BCFC深知其包括(i)提供並維持安全及健康 的工作條件:(ii)提供培訓及指導,讓員工可 安全地工作:(iii)對健康與安全保持持續增長 的興趣:(iv)考慮所有有關健康與安全的法定 要求:(v)盡可能諮詢僱員並使其參與健康與 安全事宜:及(vi)對公眾、遊客及承包商的責 任。

BCFC的管理層亦明白其僱員有責任落實實 施健康與安全政策,具體包括(i)安全工作: (ii)履行法定職責:(iii)報告導致或可能導致受 傷或損壞的事故:及(iv)遵循健康與安全程序 及工作安全制度。

根據英國《1974年工作健康與安全法》(「健 康與安全法」)第2(1)條,BCFC的管理層有責 任在合理可行情況下,照顧所有僱員以及任 何其他可能受工作活動影響之人士的健康、 安全及福利。

根據健康與安全法第7條,在BCFC工作的每 名僱員均有勤勉責任對其本身以及可能受僱 員行為或疏忽影響的任何其他人士予以合理 照顧。

#### HEALTH AND SAFETY (Continued)

The Health and Safety Committee is formed pursuant to statutory requirements and is responsible for ensuring the compliance with the relevant laws and regulations. The structure of this committee comprises safety officer, operations director, maintenance manager, etc. Employees also have a duty to assist and co-operate with BCFC and any other person to ensure all aspects of Health and Safety Law are adhered to.

All BCFC's employees receive written instructions from a competent person on fire safety at the induction stage of their employment and are updated at least annually. Training course contents include but not limited to (i) the procedures to be adopted in case of fire; (ii) the methods of raising the alarm; (iii) the actions to be taken on hearing the alarm; and (iv) the positions and uses of all fire fighting equipment.

Being a professional football club in the UK, BCFC is required to follow compliance instructions from Ground Regulations and the rules and regulations of the Fédération Internationale de Football Association, the Union of European Football Associations, the Football Association ("FA"), the Premier League and the EFL in respect of the relevant competition.

The Ground Regulations of BCFC are posted on every entrance of the Stadium. Security guards who work on match day are required to ensure that no prohibited articles are allowed into ground.

BCFC has a comprehensive security system and has installed closed-circuit televisions ("CCTV") in every area of the Stadium. All these security systems and CCTV are controlled by the security room located at the Stadium.

## 社會方面*(續)*

### 健康與安全(續)

根據法定要求,健康安全委員會已經成立。 該委員會負責確保相關法律及法規得以遵 守。該委員會的架構包括安全主任、營運總 監、維護經理等。員工亦有責任協助BCFC 及任何其他人士並與其合作,以確保健康與 安全法的所有方面均得以遵守。

BCFC的全體僱員在入職時會接受消防安全 專業人員的書面指導,並至少每年更新一次。培訓課程內容包括但不限於(i)遇火災時 應採用的程序;(ii)發出警報的方法;(iii)聽到 警報時應採取的行動;及(iv)所有消防設備的 位置及使用。

作為英國的一家職業足球球會,BCFC須 遵守球場規定的合規指示以及國際足球協 會、歐洲足球協會聯盟、英格蘭足球總會 (「FA」)、英格蘭超級足球聯賽及英格蘭足球 聯賽有關比賽的規則及規定。

BCFC的球場規定張貼在球場的每個入口 處。在比賽當日工作的保安人員須確保沒有 違禁物品進入球場。

BCFC有全面的保安系統,並在球場的每個 區域安裝了閉路電視(「閉路電視」)。所有該 等保安系統及閉路電視均由位於球場的保安 室控制。



Ground Regulations of BCFC BCFC的球場規定



Notice on entrance of the Stadium 球場入口之告示

### HEALTH AND SAFETY (Continued)

Besides, BCFC outsourced event security services (e.g. match day event) at the Stadium to a professional company to ensure safety of all the attendees of event.

In an effort to prevent and control the spread of the COVID-19 pandemic, BCFC has been closely monitoring the policies and advices from local government as well as continually reviewing the ongoing situation and taking on medical advice with a view to the health and well-being of players, staff, supporters, corporate partners and guests. Measures in response to the spread of the COVID-19 pandemic have been taken in Year 2021, including but not limited to:

- Restricting the Training Ground access to first team players men's and women's teams – first team coaches and essential support staff;
- Arranging small group training at the Training Ground or social distance training;
- Cancelled all planned player community and commercial appearances as well as training ground visits during the lockdown period;
- Informing supporters not to request autographs or selfies with players they may come across in social settings;
- Delivering technical, sports science and fitness sessions, education and continued professional development itineraries virtually;
- Creating online programme such as physical session over Zoom for age group Under-8s up to Under-23s;

## 社會方面*(續)*

## 健康與安全(續)

此外,BCFC外聘一家專業公司在球場提供 比賽日活動等活動的保安服務,以保證所有 活動參與者的安全。

為預防及控制COVID-19大流行傳播,BCFC 一直密切監察當地政府的政策及意見,並 不斷檢討當前狀況及就球員、員工、球迷、 企業合作夥伴及嘉賓的健康及福祉採取 醫療意見。於2021年度,已採取措施應對 COVID-19大流行的傳播,包括但不限於:

- 限制訓練場予一線隊球員(男子隊及女 子隊)、一線隊教練及基本支援人員使 用;
- 於訓練場安排小組訓練或社交距離訓 練;
- 於封城期間取消所有已計劃的球員社
   區及商業活動以及訓練場參觀;
- 通知球迷於社交場合遇到球員不要要 求簽名或拍照;
- 提供虛擬技術、體育科學及健身課 程、教育及持續專業發展行程;
- 為8歲以下至23歲以下的年齡組別學員 創建網上課程,例如透過Zoom進行體 能課程;

## HEALTH AND SAFETY (Continued)

- Designating a COVID-19 Officer who is responsible for the oversight of the risk and mitigation planning, communicating information to all user groups and ensuring the necessary standards are met;
- Implementing BCFC's Matchday Operational Plan Behind Closed Doors which was created in June 2020 in order to consider the impact of COVID-19 and take additional measures to manage the health, safety and well-being of all staff, players, coaches, broadcasters, media and contractors and provide the safest possible stadium environment for match day delivery behind closed doors; and
- Providing hand sanitizer dispensers around the ground.





Hand sanitizer dispensers around the Stadium 於球場四周設置的手部消毒噴霧



Social distancing signs on the floor around the Stadium 於球場四周地板上的社交距離標誌

## 社會方面(續)

健康與安全(續)

- 指派一名COVID-19人員負責監督風險及 緩解計劃,向所有用戶群傳達信息及確 保符合所需的標準;
- 實施於2020年6月設立的BCFC閉門作 賽比賽日營運計劃(BCFC's Matchday Operational Plan Behind Closed Doors),以考慮COVID-19的影響及採 取額外措施以管理所有員工、球員、教 練、廣播員、媒體及承包商的健康、安 全及福祉,並為閉門比賽當天提供最安 全可行的球場環境;及
- 於球場四周提供手部消毒噴霧。

## HEALTH AND SAFETY (Continued)

BCFC strictly regulates the operation of its business to ensure the compliance with national and local laws and regulations relating to health and safety during the course of operation. In Year 2021, there was no case of material non-compliance with Access to Medical Report Act 1988, Access to Health Records Act 1990, Health and Safety at Work Act 1974 and the relevant laws and regulations relating to providing a safe working environment and protecting employees from occupational hazards that have a significant impact. In addition, there was no report of significant fines or sanctions as a result of non-compliance with the relevant laws and regulations in Year 2021. There were no work-related fatalities reported for the years ended 30 June 2019, 2020 and 2021. During Year 2021, 69 lost-days due to work injury were recorded.

### DEVELOPMENT AND TRAINING

All new employees of BCFC will attend an induction programme. BCFC aims to give new employee as much help and information as possible to help them to settle down quickly into their new job. At the commencement of employment, on-the-job training will be arranged for employees by immediate supervisor or line manager.

BCFC also includes a Time Off to Train Policy in its staff handbook, which allows employees to request time off for training. The details of the application procedures are stated in the staff handbook.

BCFC provided a number of training courses to its staff in Year 2021. Due to the COVID-19 pandemic and lockdown, most of the training courses were conducted online. The following list summarised the training courses provided:

- Safeguarding Investigations Workshop
- Gambling and Gaming Awareness Education Programme
- Senior Safeguarding Manager Core Training
- Introduction to Online Safety
- Prevent Training
- FA Safeguarding Children Re-Certification
- Safeguarding Children Level 3 Designated Officer
- Safeguarding Children Course
- Adverse Childhood Experiences Core Safeguarding Module
- Update for Existing Designated Safeguarding Leads on Safeguarding & Child Protection

## 社會方面*(續) 健康與安全(續)*

BCFC嚴格規管其業務的營運,以確保於營 運過程中遵守與健康及安全相關的國家及地 方法律及法規。於2021年度,概無嚴重違反 《1988年公開醫療報告法案》、《1990年公開 健康記錄法案》、《1974年工作健康與安全 法》及與提供安全工作環境及保障僱員免受 職業危害有關的相關法律及法規並有重大 影響的行為。此外,於2021年度內,並無因 違反相關法律及法規而招致重大罰款或制裁 的報告。於截至2019年、2020年及2021年6 月30日止年度,並無工作相關死亡事故的報 告。於2021年度期間,錄得69日因工傷而損 失工作日數。

#### 發展及培訓

BCFC的所有新員工將參加入職培訓。BCFC 致力為新員工提供協助及資訊,以助他們盡 快適應新工作。在受僱開始時,僱員將由直 屬上司或部門經理安排在職培訓。

BCFC亦將利用空餘時間培訓政策載入其員 工手冊,根據該政策,僱員可申請利用空餘 時間進行培訓。有關申請程序的詳情載於員 工手冊。

於2021年度,BCFC已為員工提供若干培訓 課程。由於COVID-19大流行及封城,大部 分培訓課程於網上進行。所提供培訓課程的 清單概列如下:

- 保障調查研討會
- 賭博和博彩意識教育課程
- 高級安全保護經理核心培訓
- 網上安全介紹
- 防範培訓
- 足總保護兒童再認證
- 保護兒童第3級一指定人員
- 保護兒童課程
- 童年逆境經驗核心保護單元
- 現有指定的兒童安全負責人於兒童安 全與保護方面的最新資料

僱員數目計算。

SOCIAL ASPECTS (Continued)		<b>社會方面</b> (續)		
DEVELOPMENT AND TRAINING (Continued)	發展及培訓(續)			
During Year 2021, the average training hours completed per employee and percentage of employees trained are as follows:		於2021年度期間,每名僱員已完成的平均培 訓時數和受訓僱員的百分比載列如下:		
	Year 2021		2021年度	
Average number of training hours completed		按性別劃分每名僱員已	完成的平均	
per employee by gender		培訓時數		
Male	603 hours	男性	603小時	
Female	58 hours	女性	58小時	
Average number of training hours completed		按僱員類別劃分每名僱員		
per employee by employee category		已完成的平均培訓時	數	
Senior management	39 hours	高級管理層	39小時	
Middle management	185 hours	中級管理層	185小時	
General staff	437 hours	一般員工	437小時	
Percentage of employees trained by gender (Note 1)		按性別劃分受訓僱員百	「分比 <sup>(附註1)</sup>	
Male	81%	男性	81%	
Female	19%	女性	19%	
Percentage of employees trained by employee		按僱員類別劃分受訓偱	員	
category (Note 1)		百分比(附註1)		
Senior management	9%	高級管理層	9%	
Middle management 21%		中級管理層	21%	
General staff	70%	一般員工	70%	
Note 1: The percentage of employees trained by category is calculated based on the number of employees trained in each category		<i>附註1:</i> 按類別劃分受該 內各類別受訓條	川僱員百分比乃根據期 雇員數目除以參加培訓	

based on the number of employees trained in each category during the period divided by the number of employees who took part in training.

## 21

### LABOUR STANDARDS

BCFC fully understands that the exploitation of child and forced labour are universally condemned, and therefore take the responsibility against child and forced labour. From time to time, BCFC reviews its overall employment practices to avoid child or forced labour and other potential irregularities. Members of staff is required to provide identification documents upon joining BCFC. Should the staff provide false identity or false personal particulars, the said staff would be considered to have committed serious breach of BCFC's rules and regulations, his/her employment would be terminated immediately. In Year 2021, BCFC strictly complied with the relevant laws and regulations in respect of child and forced labour that have a significant impact on BCFC.

BCFC strictly regulates the operation of its business to ensure the compliance with national and local laws and regulations relating to labour standards during the course of operation. In Year 2021, there was no case of material non-compliance with Section 54 of the Modern Slavery Act 2015 of the UK and the relevant laws and regulations relating to preventing child or forced labour that have a significant impact. In addition, there was no report of significant fines or sanctions as a result of non-compliance with the relevant laws and regulations in Year 2021.

#### SUPPLY CHAIN MANAGEMENT

BCFC has set up strict supply chain management system to ensure high quality of food and products are provided to its customers. Specific attention has been paid to promote the health and safety of consumables of BCFC's restaurants and catering services.

Executive head chef and his team members are responsible for ensuring Hazard Analysis and Critical Control Points (HACCP) procedures are fully updated and implemented in full in all kitchens for delivery, service and storage of food. Besides, all food suppliers of BCFC must meet the relevant environmental health standards.

## 社會方面(續)

## 勞工準則

BCFC深知,社會一致譴責剝削兒童及強 制勞工,因此針對童工及強制勞工負有重 大責任。BCFC不時審閲其整體僱傭慣例, 以避免童工或強迫勞工和其他潛在違規行 為。員工於加入BCFC時需要提供身份證明 文件。倘若員工提供虛假身份或虛假個人 資料,該員工將被視為嚴重違反BCFC的規 則和規例,並將立即終止僱用。於2021年 度,BCFC嚴格遵守有關童工和強迫勞工並 對BCFC有重大影響的相關法例和法規。

BCFC嚴格監管其業務營運,以確保於營運 過程遵守有關勞工準則的國際及當地法律及 法規。於2021年度,BCFC並無嚴重違反英 國《2015年現代奴隸制法》第54條以及與防 止童工或強制勞工相關的法律及法規並對 BCFC產生重大影響之行為。此外,於2021 年度,BCFC並無發生違反相關法律及法規 的行為而招致重大罰款或制裁。

#### 供應鏈管理

BCFC已建立嚴格的供應鏈管理體系,確保 向客戶提供優質食品及產品。尤其關注促進 BCFC的餐廳及餐飲服務消費品的健康與安 全。

行政總廚及其團隊成員負責確保危害分析和 關鍵控制點(HACCP)程序得以全面更新,並 在所有廚房中充分實施以派送食品、服務及 儲存食品。此外,BCFC的所有食品供應商 均須符合相關環境衛生標準。

### SUPPLY CHAIN MANAGEMENT (Continued)

To identify environmental and social risks along the supply chain and to promote environmentally preferable products and services when selecting suppliers, BCFC's requirements on environment and social and occupational health safety, to contracting parties on a timely basis, to ensure their understanding towards BCFC's requirements. Suppliers are chosen based on the supplier's continuous ability to guarantee satisfactory product guantity and guality, reasonable price, timely delivery, environmental friendliness and good services. To protect our vital interests, BCFC always selects legitimate suppliers with good quality, relevant qualifications and excellent service capabilities on the basis of transparency and fairness. The performance of suppliers in discharging their environmental and social responsibilities is also one of the evaluation criteria for our suppliers. In the process of selecting suppliers, factors such as candidates' sustainable development and management strategies, labour standards, moral standards and environmental management systems are included in the scoring system for close examination. BCFC also encourages suppliers to actively assume their corporate social responsibilities by observing the regulatory requirements and business ethics in respect of business operation, marketing campaigns, social occasions and environmental obligations.

In order to ensure the materials of the football kit meet the appropriate environmental standards, BCFC has selected Nike, Inc. ("Nike") as the kit supplier starting from the 2020/21 season.

Nike, as the world's leading footwear and apparel company, provides kits for the men's and women's and academy teams, as well as for coaching staff and a full range of training and leisurewear and is a major supplier of BCFC.

Nike holds itself to the highest standards and takes its local and global responsibilities seriously. Nike's supplier factories must meet a rigorous set of compliance requirements and is committed to engaging and growing its business to create a lean, green and equitable supply chain. Nike is also working to eliminate footwear manufacturing waste to landfill by recycling or converting to energy and increase the use of more sustainable materials across its products.

Head of ticketing and retail and his team members are responsible for ensuring the suppliers meet environmental health standards and that the products from the suppliers are of high qualities.

## 社會方面(續)

## **供應鏈管理**(續)

為識別供應鏈上的環境和社會風險,並於 挑選供應商時推廣環境友善產品和服務, BCFC將對環境和社會及職業健康安全的 要求及時傳達予訂約方,以確保他們理解 BCFC的要求。BCFC根據供應商持續保證 令人滿意的產品數量和質量的能力、合理價 格、準時交貨、環境友善和良好服務挑選供 應商。為保障我們的切身利益,BCFC一直 於透明和公平的基礎上挑選具有良好質量、 相關資格和優秀服務能力的合法供應商。供 應商於履行環境和社會責任方面的表現亦是 我們對供應商的評價標準之一。於挑選供應 商的過程中,候選人的可持續發展和管理戰 略、勞工標準、道德標準和環境管理系統等 因素均納入評分系統進行嚴格審查。BCFC 亦鼓勵供應商積極承擔企業社會責任,於商 業營運、營銷活動、社交場合和環境責任方 面遵守監管規定及商業道德。

為確保全套足球服裝的物料達到適當環境標準,BCFC自2020/21賽季起選擇Nike,Inc. (「Nike」)作為服裝供應商。

Nike作為世界領先的鞋類和服裝公司,為男 子隊、女子隊和學院隊伍以及教練提供球 衣,並提供全套訓練和休閒服裝,是BCFC 的主要供應商。

Nike對本身設定嚴格要求,並認真履行其於 地方和全球的責任。Nike的供應商工廠必須 符合一套嚴格的合規要求,並致力參與和發 展其業務,以創建一個精簡、綠色和公平的 供應鏈。Nike亦致力通過回收或轉化為能源 來消除鞋類製造所產生的廢棄物,並在其產 品中增加使用更具可持續性的材料。

票務及零售主管及其團隊成員負責確保供應 商符合環境衛生標準,以及供應商提供的產 品具有高品質。

#### SUPPLY CHAIN MANAGEMENT (Continued)

During Year 2021, the number of suppliers of BCFC by geographical region is as follows:

#### Number of suppliers

#### Region

UK

#### PRODUCT RESPONSIBILITY

BCFC recognises the importance of intellectual property protection and hence is committed to protecting intellectual property rights. BCFC registered a number of trademarks in the UK and branded its business by using "Birmingham City Football Club" and "Birmingham City F.C." as its brand name and "BluesTV" as its broadcasting service.

BCFC has been rated as a 5 star (the highest rating) food hygiene for the last 9 years which is given by the Food Standards Agency (the "FSA") in the UK. The FSA is an independent government department in the UK which is responsible for food safety and food hygiene and protecting public health.

The last inspection was done by the FSA on 12 February 2020. The food hygiene rating is made up of the following: (i) hygienic handling of food including preparation, cooking, re-heating, cooling and storage; (ii) cleanliness and condition of facilities and building to enable good food hygiene, including having appropriate layout, ventilation, hand washing facilities and pest control; and (iii) system or checks in place to ensure that food sold or served is safe to eat, evidence that staff know about food safety, and the food safety officer has confidence that standards will be maintained in future.

BCFC has established Privacy Policy to ensure compliance with the General Data Protection Regulation. BCFC is committed to protecting customers' privacy and will take all steps necessary to comply with legal obligations when using the personal data.

BCFC strictly regulates the operation of its business to ensure the compliance with national and local laws and regulations relating to product responsibility during the course of operation. In Year 2021, there was no case of material non-compliance with the Waste Electrical or Electronic Equipment, the Consumer Protection Act 1987, the General Data Protection Regulation, the Data Protection Act 2018 and the relevant laws and regulations relating to health and safety, labelling and privacy matters relating to products and services provided and methods of redress that have a significant impact. In addition, there was no report of significant fines or sanctions as a result of non-compliance with the relevant laws and regulations in Year 2021.

**社會方面**(續) **供應鏈管理**(續) 於2021年度期間,BCFC的供應商數目按地 區劃分載列如下:

#### 供應商數目

**地區** 英國

40

40

## 產品責任

BCFC知悉知識產權保護的重要性,因此致 力保護知識產權。BCFC於英國註冊多項商 標,並以「Birmingham City Football Club」 和「Birmingham City F.C.」作為其業務的品 牌名稱,以「BluesTV」作為其廣播服務。

BCFC在食品衛生方面於過去九年獲英國食品標準局([FSA])評為五星級(最高評級)。 FSA為英國獨立的政府部門,負責食品安全 及食品衛生,以及保障公眾健康。

FSA已於2020年2月12日進行最近一次檢查。食品衛生評級根據以下各項制定:(i)食品於準備、烹調、翻熱、冷卻及儲存方面的衛生處理:(ii)設施及建築物的潔淨程度及狀況,以確保良好食品衛生,包括有適當的間隔、通風、洗手設施及害蟲管制;及(iii)設有制度或檢查措施,確保出售或供應的食品可安全食用,證明員工了解食品安全,以及食品安全主任相信未來將可維持有關標準。

BCFC已制定私隱政策,確保遵守《通用數據 保障條例》。BCFC致力保障客戶私隱,並將 於使用個人資料時採取一切所需措拖以遵守 法律責任。

BCFC嚴格監管其業務營運,以確保於營運 過程遵守有關產品責任的國際及當地法律 及法規。於2021年度,BCFC並無嚴重違反 《廢棄電器或電子產品》、《1987年消費者保 障法》、《通用數據保障條例》、《2018年數據 保護法》及與健康和安全、所提供產品及服 務相關的標籤及私隱事宜以及糾正方法的相 關法律及法規並對BCFC產生重大影響之行 為。此外,於2021年度,BCFC並無發生違 反相關法律及法規的行為而招致重大罰款或 制裁。

## **PRODUCT RESPONSIBILITY** (Continued)

During Year 2021, there were no recalls of products due to safety and health reasons and no complaints related to product and service were received.

#### ANTI-CORRUPTION

Bribery is strictly prohibited. BCFC's Anti-Bribery Policy of the staff handbook set out standards of conduct to which all employees are required to adhere to in order to promote integrity in workplace environment. All employees are prohibited to give and accept of personal, commercial, regulatory or contractual advantage, by using the excuse of work or the authority granted from BCFC. The advantages include but not limited to money, gifts and hospitality.

BCFC's employees who beach these provisions may be subject to disciplinary action, one outcome of which could be summary dismissal for gross misconduct. BCFC requires that all its staff, including those permanently employed, temporary agency staff and contractors to (i) act honestly and with integrity at all times and to safeguard the organisation's resources for which they are responsible for; and (ii) comply with the spirit of the laws and regulations of all jurisdictions in which BCFC operates in respect of the lawful and responsible conduct of activities.

Facilitation payments are not tolerated and are illegal. And where any gifts and hospitality has a value in excess of GBP100, employees should refuse the offer or invitation.

BCFC is committed to ensure that all employees have a safe, reliable and confidential way of reporting any suspicious activity. Therefore, BCFC has established the Whistleblowing Policy which states that the whistle-blowers remain anonymous. BCFC is committed to ensure nobody suffers detrimental treatment from refusing to take part in bribery or corruption.

Sound organisational structures and policies are in place to uphold a high standard of corporate governance and maintain an ethical corporate culture.

BCFC strictly regulates the operation of its business to ensure the compliance with national and local laws and regulations relating to anti-corruption during the course of operation. In Year 2021, there was no case of any material non-compliance with the Bribery Act 2010 and the relevant laws and regulations relating to bribery, extortion, fraud and money laundering that have a significant impact. In addition, there was no report of significant fines or sanctions as a result of non-compliance with the relevant laws and regulations in Year 2021. Due to the COVID-19 pandemic and lockdown, BCFC did not conduct any relevant training during Year 2021.

社會方面*(續)* 

**產品責任**(續)

於2021年度期間,並無因安全和健康原因召回產品,亦無收到有關產品和服務的投訴。

## 反貪污

賄賂乃嚴格禁止。BCFC員工手冊中的反貪 污受賄政策載有全體僱員必須遵守的行為準 則,以提倡工作場所的誠信氣氛。全體僱員 禁止以工作或BCFC授予的權限為藉口給予 及收受個人、商業、監管或合約上的好處, 包括但不限於金錢、禮物及宴請。

違反該等條文的BCFC僱員可能會受到紀律 處分,其中之一可能是對嚴重不當行為予以 即時解僱。BCFC要求其全體員工(包括長期 僱員、臨時代理員工及承建商)須(i)時刻誠實 守信行事,保障所負責機構的資源:及(ii)遵 守BCFC營運所在所有司法權區的法律及法 規有關依法及負責任地展開活動的精神。

疏通費是不可予容忍的非法行為。對於價值 超過100英鎊的禮物或宴請,僱員應拒絕要 約或邀請。

BCFC致力確保全體僱員有安全、可靠及保 密的方式舉報任何可疑行為。為此,BCFC 已制定舉報政策,其中規定可匿名提出問 題。BCFC致力確保沒有人因拒絕參與賄賂 或貪污而遭到不利對待。

健全的組織架構及政策已經設立,以確保高 標準企業管治,維護道德企業文化。

BCFC嚴格監管其業務營運,以確保於營運 過程遵守有關反貪污的國際及當地法律及 法規。於2021年度,BCFC並無嚴重違反 《2010年賄賂法》及與賄賂、勒索、欺詐和 洗黑錢有關的相關法律及法規並對BCFC產 生重大影響之行為。此外,於2021年度, BCFC並無發生違反相關法律及法規的行為 而招致重大罰款或制裁。由於COVID-19大 流行和封城,BCFC於2021年度期間無進行 任何相關培訓。

## ANTI-CORRUPTION (Continued)

During Year 2021, the Company provided its directors and employees with training materials regarding corporate ethics and anti-corruption, such as the Hong Kong's Competitive Edge -Partnership in Business Ethics: Toolkit on Directors' Ethics which is published by Hong Kong Business Ethics Development Centre and Independent Commission Against Corruption, Hong Kong, in order to increase their awareness on anti-corruption.

#### **COMMUNITY INVESTMENT**

The primary objective of BCFC is to be successful, both on and off the field, and to be financially viable and to play at the highest professional level. On the road to achieve its aims that it will not lose sight of the fact that it is a community-led business, and taking care of its customers will be its prime objective.

BCFC aims to build the best customer relationships with supporters, home and away, as well as the local community in which the club serves. BCFC's core business is the operation of a professional football club which is committed to develop a diverse range of commercial and community activities that will serve the whole community. BCFC Community Trust was formed under the auspices of Supporters Direct in 2012 to inspire young people to achieve their goals. It is a registered charity based at the Stadium. BCFC Community Trust work closely collaboration with, and utilising the unique stage of BCFC, aims to break down barriers to engage, inspire and create opportunities for people, including the most vulnerable, within the communities of Birmingham and Solihull.

BCFC is proud of the considerable off-field support it delivers each season to various charitable causes and community groups. BCFC acknowledges the responsibility, impact and influence that professional football club carries and through this, BCFC aims to make a positive difference to the lives of people in Birmingham.

#### 社會方面(續)

## **反貪污**(續)

於2021年度期間,本公司為其董事和僱員提 供有關企業道德和反貪污的培訓材料,例如 由香港商業道德發展中心和香港廉政公署刊 發的「香港優勢-夥伴共建誠信營商」董事誠 信實務指南,以提升他們的反貪污意識。

#### 社區投資

BCFC的主要目標是在球場內外均取得成功,財政健全,以及按最高專業水平比賽。 在實現目標的道路上,BCFC不會忽視其作 為一個社區主導企業的事實,並以照顧客戶 為其主要目標。

BCFC旨在與主場及客場的球迷以及所服務 的當地社區建立最佳客戶關係。BCFC的核 心業務是營運職業足球球會,致力發展各種 商業及社區活動,為整個社會服務。BCFC 社區信託於2012年在Supporters Direct的贊 助下成立,旨在激勵年輕人實現目標。此乃 一個位於球場的註冊慈善機構。BCFC社區 信託與BCFC緊密合作,並利用BCFC的獨特 舞台,旨在為伯明翰及索利哈爾社區內的市 民(包括弱勢社群)打破障礙以參與、啟發及 創造機會。

BCFC對於每個賽季為不同慈善事業及社區 團體提供大量場外支持感到自豪。BCFC知 悉職業足球球會所肩負的責任、作用及影 響,因此,通過上述支持,BCFC致力為伯 明翰市民的生活帶來正面的變化。

## COMMUNITY INVESTMENT (Continued)

社會方面(續) 社區投資(續)

BCFC is committed to supporting local charities, community organisations and individuals in raising awareness and/or funds for each of the various causes it supports, and fully recognises the positive part it can play through meaningful collaboration and partnerships. During Year 2021, BCFC staff participated in the "Walk For Sport" fundraising campaign by walking a 12-hour, 36mile route that detours past 50 local schools to deliver two hours of free coaching and physical education lessons. BCFC has official charity partnership with University Hospitals Birmingham Charity which supports four of Birmingham's largest hospitals and has been working with the organisation since the outbreak of the COVID-19 pandemic. BCFC has already started its support for coming year by launching raffles and sponsoring men's and women's season tickets. In addition, BCFC has its first international charity partnership, the Mustard Seed Project in Kenya which run nursery and primary school in Mombasa that provide quality education to children from deprived backgrounds.

BCFC takes pride in its facilities for disable supporters and is fully committed to providing any facilities a disabled supporter may need. BCFC currently offers 88 wheelchair spaces at the Stadium. 67 spaces are allocated to home supporters and 21 wheelchair bays are allocated to away supporters. Home supporter wheelchair bays are located in the Kop, Tilton, East Paddocks and the Gil Merrick stand. The away supporter wheelchair bays are located in the Gil Merrick stand and are located with the away supporters. In addition, BCFC provides 6% of its parking places available to disabled supporters.

## BCFC致力支持當地慈善機構、社區組織及 個人以提高對其所支持的各種事業的意識 及/或籌集資金,並深知其透過有意義的 合作及夥伴關係可以發揮的積極作用。於 2021年度期間,BCFC員工參加「Walk For Sport」籌款活動,以12小時行走36英里, 繞過50間當地學校,提供兩小時的免費教 練和體育課。BCFC與University Hospitals Birmingham Charity建立官方慈善合作夥伴 關係,該機構支持伯明翰的四家大型醫院, 並自COVID-19大流行爆發起一直與組織合 作。BCFC已透過推出抽獎活動和贊助男子 和女子比賽的季票支持來年的工作。此外, BCFC亦與肯亞的「Mustard Seed Project」 建立第一個國際慈善合作夥伴關係,該項目 於蒙巴薩經營幼兒園和小學,為貧困兒童提 供優質教育。

BCFC以其傷健球迷設施為榮,並全力提供 傷健球迷可能需要的任何設施。BCFC現 時於球場提供88個輪椅位置。67個位置分 配予主場球迷,21個輪椅區分配予客場球 迷。主場球迷輪椅區位於Kop、Tilton、East Paddocks及Gil Merrick看台。客場球迷輪椅 區位於Gil Merrick看台,並與客場球迷處於 同一區域。此外,BCFC為傷健球迷提供6% 泊車位。



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## Birmingham Sports Holdings Limited 伯明翰體育控股有限公司

ALLOY

SWALLOW

31/F., Vertical Sq, No. 28 Heung Yip Road, Wong Chuk Hang, Hong Kong 香港黃竹坑香葉道28號嘉尚匯31樓 Tel 電話: (852) 2548 2928 Fax 傳真: (852) 2548 2782 Website 網頁: www.bshl.com.hk