



# Sanxun Holdings Group Limited 三巽控股集團有限公司

(Incorporated in the Cayman Islands with limited liability)  
(於開曼群島註冊成立的有限公司)

Stock Code 股份代號 : 6611

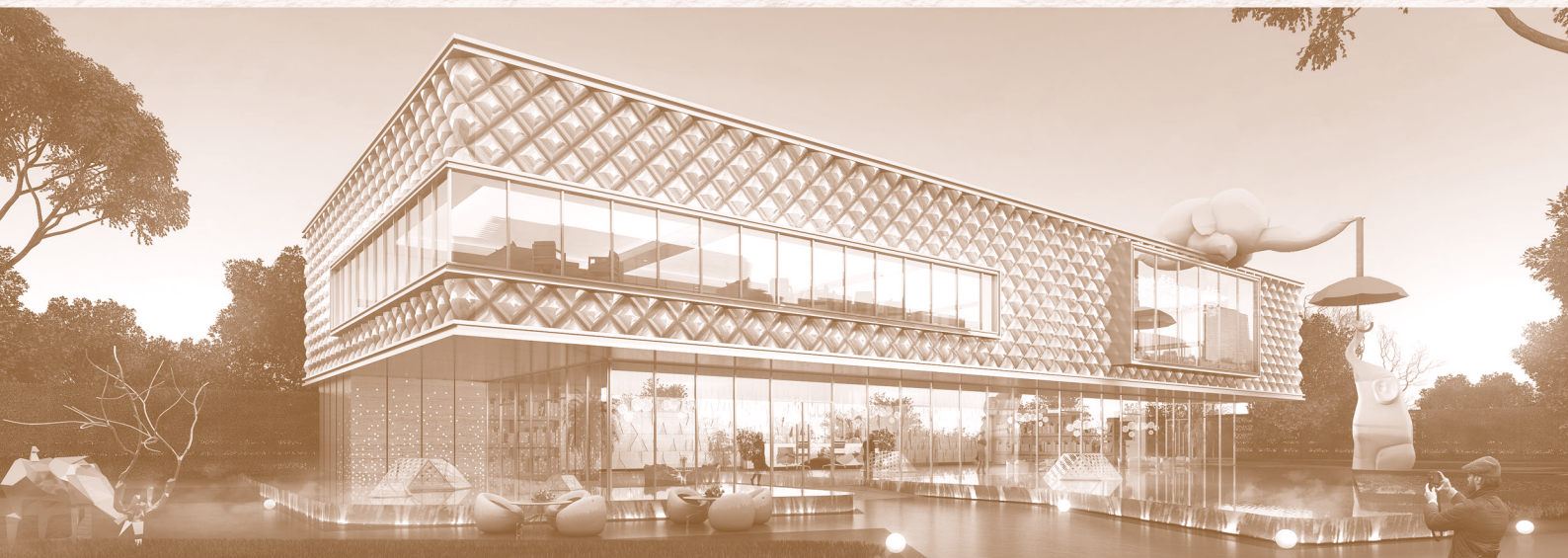


Environmental, Social and Governance Report 環境、社會及管治報告

# 2021

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# ABOUT THE REPORT

## 關於此報告

Sanxun Holdings Group Limited (the “**Company**”) (Stock Code: 6611) together with its subsidiaries (collectively, the “**Group**” or “**we**”) are pleased to present the 2021 Environmental, Social and Governance (“**ESG**”) Report (the “**ESG Report**” or “**this Report**”). The ESG Report will focus on the Group’s strategies and efforts in fulfilling its corporate social responsibility and practicing sustainable development. For more information on the Group’s corporate governance framework and practices, please refer to the Corporate Governance Report in the Company’s Annual Report for the year ended 31 December 2021.

### SCOPE OF THE REPORT

This ESG Report is as of 31 December 2021 (the “**Year**”) and the information contained herein covers the Group’s residential property development and sales operations in the People’s Republic of China (the “**PRC**”). After considering the importance of various businesses in terms of revenue contribution in the Year, the environmental key performance indicators disclosed in the ESG Report are based on the performance of the Group’s head office and 8 major regional offices for the Year, namely: Chuzhou, Bozhou, Lixin, Hefei, Huaiyuan, Ningyang, Nanjing and Wuxi (collectively, the “**Offices**”).

The Group will continue to review the business areas covered by its environmental, social and governance key performance indicators (“**key performance indicators**” or “**KPIs**”) and will actively prepare to expand the scope of disclosure of ESG Report in the future.

### FRAMEWORK OF THE REPORT

This Report has been prepared in accordance with the mandatory disclosure requirements and “comply or explain” provisions of the Environmental, Social and Governance Reporting Guidelines (the “**ESG Guidelines**”) as set out in Appendix 27 of the Rules Governing the Listing of Securities on The Stock Exchange of Hong Kong Limited (the “**Stock Exchange**”). The content index of the ESG Guidelines set out in Appendix II to this Report summarises the scope of the Company’s application of the ESG Guidelines and cross-references to the relevant chapters of this Report.

三巽控股集團有限公司(「**本公司**」)(股份代號：6611)連同旗下附屬公司(合稱「**本集團**」或「**我們**」)欣然提呈2021年度的環境、社會及管治(「**ESG**」)報告(「**ESG報告**」或「**本報告**」)。ESG報告將集中闡述本集團在履行企業社會責任及實踐可持續發展的策略和工作，如欲索取有關本集團企業管治框架及做法的更多資料，請參閱本公司二零二一年十二月三十一日止年度報告之企業管治報告。

### 報告範圍

此ESG報告截至二零二一年十二月三十一日(「**本年度**」)，而所載的資料涵蓋本集團於中華人民共和國(「**中國**」)的住宅物業開發及銷售業務。綜合本年度各項業務的營業貢獻等重要性衡量，ESG報告所披露的環境關鍵績效指標是基於本集團總部辦公室及本年度之8個主要區域辦公室的表現，包括：滁州、亳州、利辛、合肥、懷遠、寧陽、南京和無錫(統稱為「**辦公室**」)。

本集團將會持續審視其環境、社會及管治關鍵績效指標(「**關鍵績效指標**」或「**KPI**」)所覆蓋的業務範疇，並會積極籌備於未來擴大ESG報告的披露範圍。

### 報告框架

本報告是根據香港聯合交易所有限公司(「**聯交所**」)證券上市規則附錄二十七所載《環境、社會及管治報告指引》(「**ESG指引**」)中的強制披露規定及「不遵守就解釋」條文編製。載於本報告附錄二之ESG指引內容索引概括了本公司應用ESG指引之範圍及交互參照本報告相關章節的資料。

## REPORTING PRINCIPLES

During the preparation of this Report, the Group has made disclosures in accordance with the following principles set out in the ESG Guidelines of the Stock Exchange:

- **Materiality**  
The content of the ESG report is mainly determined through stakeholder engagement and materiality assessment process, which includes identifying ESG-related issues, collecting and reviewing the management and different stakeholders' opinions, assessing the relevance and materiality of the issues to the Group, and preparing and validating KPIs in the ESG report. This Report has covered the key issues that are concerned by different stakeholders and the related impacts.
- **Quantitative**  
The disclosure of KPIs in the ESG Report is supported by quantitative data and measurable standards. All statistics, calculation tools, methodologies, reference materials and sources of conversion factor used are disclosed when presenting the emission data and energy consumption.
- **Consistency**  
In order to maintain meaningful comparability of ESG performances between years, the Group adopts consistent reporting and calculation methodologies as far as reasonably practicable. For any changes in methodologies or relevant KPIs used, the Group has presented and explained in the corresponding sections.

## 報告原則

在編製本報告的過程中，本集團依照聯交所 ESG 指引所規定的原則作披露，即：

- **重要性**  
ESG 報告的內容主要通過與持份者溝通及進行重要性評估而釐定，當中包括識別 ESG 相關議題、收集並審視管理層及不同持份者的意見、評估議題與本集團的相關性及對本集團的重要性，以編製及核實 ESG 報告的 KPI 數據。本報告涵蓋了不同持份者所關注的重要議題及相關影響。
- **量化**  
ESG 報告中披露的關鍵績效指標已獲量化數據及可衡量的準則支持，當中使用的統計數據、計算工具、方法、參考數據，以及轉換因子來源均在匯報排放數據及能源消耗時予以披露。
- **一致性**  
為保持 ESG 表現的年度可比性，本集團在合理可行的情況下盡量採用一致的方法及計算方法。如所使用的方法或相關關鍵績效指標有作出任何變更，本集團會在相應章節呈列並解釋。

## ABOUT THE REPORT 關於此報告

### ESG STATEMENT OF THE BOARD OF DIRECTORS

The Group believes that good ESG governance is an integral part of the sustainable growth of enterprises and that a well-developed ESG governance system will enhance the Group's ESG performance and create greater and longer-term value for society and investors. Accordingly, the Board of Directors of the Company (the "Board") is charged with the responsibility of formulating and overseeing the Group's ESG strategy and will monitor the implementation of the relevant sustainability policies, as well as regularly reviewing the implementation of the ESG policies and ensuring that corporate ESG governance is in line with the requirements of the relevant regulatory bodies. The Board also meets regularly to review and examine the impact of potential sustainability exposure and opportunities of the Group on business development, and review whether ESG performance of the Group reaches established goals. The Board will oversee the preparation of the annual ESG report to ensure that its content and quality comply with and meet the requirements of the Board.

In addition, the Board has engaged an external independent consultant to assist in managing the Group's ESG issues this year, including conducting materiality assessments to identify key ESG issues, data collection and data analysis, etc. Some members of the Board have also been involved in providing advice and ultimately identifying the key ESG issues that the Group needs to focus on in order to plan our overall ESG development direction and deployment in the future.

### COMMENTS AND FEEDBACK

Your opinions and suggestions on the ESG report or the Group's sustainability performance are highly valued and welcome. Should you have any opinions, please contact us at IR@sanxungroup.com.

### 董事會ESG聲明

本集團相信優良的ESG管治是促進企業可持續發展不可或缺的元素，而完善的ESG管治系統將提升本集團的ESG表現，為社會及投資者創造更大、更長遠的價值。因此，本公司董事會（「董事會」）肩負起制定及監督集團ESG策略的職責，並會監察相關可持續發展政策得到貫徹實行，同時亦會定期檢討ESG政策的實施情況及確保企業的ESG管治符合相關監管機構的規定。董事會亦會定期舉行會議，以審視及檢討本集團所面對的潛在可持續發展風險與機遇對業務發展的影響，以及監督本集團ESG表現是否達到已訂立之目標。董事會將監督年度ESG報告的編成，確保其內容及質量合規並符合董事會的要求。

此外，董事會本年度已外聘獨立顧問公司協助管理本集團的ESG事宜，包括進行重要性評估以甄別重要ESG議題，資料收集及數據分析等，而部份董事會成員亦參與其中給予意見，最終釐定本集團需要重點關注的ESG議題，以規劃我們未來整體的ESG發展方向及部署。

### 意見及回饋

我們重視持份者之回饋，亦歡迎任何有關ESG報告或本集團可持續發展表現的意見及建議。若閣下有任何意見，請透過電郵至IR@sanxungroup.com與我們聯絡。

## ABOUT THE GROUP 關於本集團

The Group is a real estate developer in the PRC focusing on the development and sale of residential properties. Headquartered in Shanghai and deeply rooted in Anhui Province, the Group had established its presence in the Yangtze River Delta. Since its establishment, the Group has always adhered to the mission of “Creating a Happy Life” and the customer-centric design philosophy, continuously improved the quality of its products and services with a view to winning the recognition of the market and customers. The Group has currently developed its presence in 13 cities in 3 provinces, including Anhui, Jiangsu and Shandong, with a total of 48 real estate projects at different stages of development.

At present, the Group is firmly following the strategy of “2+X” (i.e. the cities surrounding Shanghai and Anhui + the cities in Yangtze River Delta Region as key national strategical cities) and the “two horizontal axes and three vertical axes” (兩橫三縱) (i.e. the Yangtze River Economic Belt + key cities along the Longhai Railway (隴海線); key cities along the Beijing-Shanghai High Speed Railway (京滬高鐵), the Beijing-Kowloon High Speed Railway (京九高鐵) and the Coastal High Speed Railway (沿海高鐵)), which will accelerate the process of the modernisation and urbanisation of China and create more possibilities for urban architecture.

On 19 July 2021, the Group was successfully listed on the Main Board of the Hong Kong Stock Exchange (Stock Code: 6611.HK), marking a new stage in the Group’s development and a new journey. This Report is the first ESG report published by the Group since its listing, marking the first milestone in the Group’s sustainable development path and covering the outlook of the Group’s further development in the industry.

Looking ahead, the Group will continue to maintain its inspiration of “Creating a Happy Life”, and will constantly update its products and improve its service quality, making contributions to a better and happier life for the people.

本集團是一家總部位於上海、植根安徽省、佈局於長三角地區、專注於住宅物業開發及銷售的中國房地產開發商。自創辦以來，本集團始終秉持著「創造幸福生活」的宗旨，以客戶為中心，不斷提升產品質量和服務品質，務求贏得市場和客戶的認可。三巽集團業務版圖現時已覆蓋安徽、江蘇、山東等3省13個城市，共有48個處於不同開發階段的房地產項目。

目前，三巽正堅定按照「2+X」(即環滬、環皖城市群+長三角國家戰略重點城市)和「兩橫三縱」(即長江經濟帶+隴海線沿線重點城市；京滬高鐵、京九高鐵、沿海高鐵沿線重點城市)的戰略，為中國現代化、城鎮化的建設進程盡一份力，為城市精築締造更多可能。

2021年7月19日，本集團成功在香港交易所主板上市，股票代碼6611.HK，標誌著本集團的發展邁向新台階、踏上新征程。而本報告是本集團上市以來發佈的第1份ESG報告，標誌著本集團在可持續發展道路的第一個里程碑，也涵蓋了未來繼續在行業深耕的展望。

展望未來，本集團將繼續保持「創造幸福生活」的初心，不斷迭代產品、提升服務，為人民美好、幸福生活賦能。

## AWARDS AND RECOGNITION

The Group and its projects have received various awards and recognitions for the Year. The Group has been ranking among the “Top 100 China Real Estate Enterprises in Comprehensive Strength” and the “Top 100 China Real Estate Enterprises in Brand Value” for three consecutive years, which is recognition and affirmation of the Group’s corporate and brand power. In addition, the Group has received various awards related to social responsibility, which is an affirmation of the Group’s contribution to society. The Group will continue to uphold its initial aspiration of “Creating a Happy Life” and strive to provide better design and higher-quality services, so as to continuously create more values for environment, customers, employees and shareholders.

## 獎項與表彰

本集團及旗下項目在本年度榮獲多個獎項與認同。本集團已經連續3年躋身「中國房企綜合實力百強」及「中國房地產公司品牌價值百強」，是對本集團的企業及品牌實力的認可和肯定。另外，本集團榮獲多項社會責任相關獎項，是對本集團於社會貢獻的肯定。本集團將繼續秉持「創造幸福生活」的初心，致力提供更優秀的設計和更高質量的服務，持續為環境、顧客、員工和股東創造更多價值。



2021 Top 100 China Real Estate Enterprises in Comprehensive Strength  
2021中國房企綜合實力百強



2021 Top 100 China Real Estate Enterprises in Brand Value  
2021中國房地產公司品牌價值百強



2021 Socially Responsible Enterprises in Anhui’s Real Estate Industry  
2021安徽房地產行業社會責任企業



2021 Anhui Quality Assured Real Estate Project  
2021安徽房地產品質放心樓盤

## INDUSTRY CONFERENCES AND FORUMS

The Group has always actively participated in the seminars and strategy summits that are influential in the real estate industry to learn from peers and grow together by sharing and discussing the industry information. The Group also assists to promote the development of the real estate industry in China while keeping abreast of the market trends, so as to promote high-quality social development and enhance the value of sustainable urban development. Going forward, the Group will continue to consolidate its own strategic deployment in the real estate industry chain and strive to optimize the quality of products and services, thereby strengthening its own competitiveness.

## 行業會議及論壇

本集團一直以來積極參與房地產行業裡具影響力的研討會及戰略峰會，通過分享及討論行業諮詢與同行互相學習砥礪，在掌握市場的動向的同時也協助推動中國房地產行業的發展，促進社會高質量發展和提升城市可持續發展的價值。在未來，本集團會繼續鞏固自身在房地產產業鏈的戰略佈局，致力優化產品和服務品質，不斷強化自身的競爭力。



Anhui Real Estate Summit Forum  
安徽房地產高峰論壇

## THE GROUP'S SUSTAINABLE DEVELOPMENT PHILOSOPHY AND PRACTICE

The Group is committed to practicing its corporate social responsibility and taking into account the social and environmental sustainable development while creating quality lives for customers. We are gradually establishing and improving the sustainable development policy of the Group, with a view to embedding the concept of sustainability throughout the business value chain and properly managing and addressing the risks and opportunities arising from the sustainable development. As a responsible real estate developer, the Group attaches great importance to the environmental protection, and expects to make contributions to the solutions on issues of combatting climate change, natural resource allocation and social public welfare, so as to support the national development and achieve the corresponding sustainable development goals.

## 集團的可持續發展理念與實踐

本集團致力實踐企業社會責任，在為客戶創造品質生活的同時，亦兼顧社會及環境可持續發展。我們正逐步建立及完善集團的可持續發展政策，務求在整個業務價值鏈中貫徹可持續發展理念，並妥善管理和應對可持續發展帶來的風險和機遇。作為一家負責任的房地產開發商，本集團重視環境保護，亦希望就應對全球氣候變化、天然資源分配及社會公益等議題做出貢獻，以配合國家發展和達至相應的可持續發展目標。



# STAKEHOLDER ENGAGEMENT

## 持份者參與

The Group attaches great importance to our stakeholders and understands the importance of maintaining close contact and communication with our stakeholders for the long-term development of the enterprise. Therefore, we have established diversified communication channels, with an aim to contact with our stakeholders from all fields and understand the views and opinions of internal and external stakeholders, thereby assisting the Group to develop a sustainable development strategy that can better balance the interests between the environment and society. During the Year, the Group has established a series of communication channels and platforms for gaining a comprehensive understanding on the stakeholders' expectations on the Group's ESG performance and thus providing timely responses.

本集團十分重視持份者，亦深明與持份者保持密切聯繫和溝通對企業長遠發展的重要性。因此，我們建立了多元化的溝通渠道，期望接觸各領域的持份者，了解內部及外部持份者的觀點和意見，以協助本集團制定更能平衡環境及社會各方利益的可持續發展策略。本集團在本年度已成立一系列溝通渠道及平台，以全面了解各持份者對本集團ESG表現的期望，從而提供適時的回應。

Stakeholders 持份者	Expectations 期望	Management's Means of Response/Communication 管理層響應／溝通方式
<b>Government and regulatory authorities</b> 政府及監管機構	<ul style="list-style-type: none"> <li>Compliance with laws and regulations 遵守法律法規</li> <li>Promotion of local economic development 促進地方經濟發展</li> <li>Payment of taxes in full and on time 按時足額納稅</li> <li>Safety construction 安全建築工程</li> </ul>	<ul style="list-style-type: none"> <li>Regular communication with regulatory authorities 定期與監管機構溝通</li> <li>Inspection and supervision 檢查及監督</li> </ul>
<b>Shareholders</b> 股東	<ul style="list-style-type: none"> <li>Income and returns 收益回報</li> <li>Compliance operation 合規運營</li> <li>Increase in corporate value 提升公司價值</li> <li>Information transparency and effective communication 信息透明及高效溝通</li> </ul>	<ul style="list-style-type: none"> <li>General meetings 股東大會</li> <li>Company announcements 公司公告</li> <li>Emails, telephone communications and company website 電郵、電話通訊及公司網站</li> <li>Special reports 專題匯報</li> <li>Inspection on site 實地考察</li> </ul>

Stakeholders 持份者	Expectations 期望	Management's Means of Response/Communication 管理層響應／溝通方式
<b>Partners</b> 合作夥伴	<ul style="list-style-type: none"> <li>• Operation with integrity 誠信經營</li> <li>• Fair competition 公平競爭</li> <li>• Performing contracts according to law 依法履約</li> <li>• Mutual benefits 互利共贏</li> </ul>	<ul style="list-style-type: none"> <li>• Review and evaluation meetings 審查與評估會</li> <li>• Business communications 商務溝通</li> <li>• Communication and discussion 交流研討</li> <li>• Negotiation and cooperation 洽談合作</li> </ul>
<b>Customers</b> 客戶	<ul style="list-style-type: none"> <li>• Sound property management 良好物業管理</li> <li>• High-quality products and services 優質產品及服務</li> <li>• Health and safety 健康與安全</li> <li>• Performing contracts according to law 依法履約</li> <li>• Operation with integrity 誠信經營</li> </ul>	<ul style="list-style-type: none"> <li>• Customer service centre and hotline 客戶服務中心及熱線</li> <li>• Customer feedback surveys 客戶意見調查</li> <li>• Social media platforms 社交媒體平台</li> </ul>
<b>Environment</b> 環境	<ul style="list-style-type: none"> <li>• Energy conservation and emission reduction 節能減排</li> <li>• Compliant emissions 合規排放</li> <li>• Ecological protection 保護生態</li> </ul>	<ul style="list-style-type: none"> <li>• Communicating with local environmental departments 與當地環境部門交流</li> <li>• Communicating with local residents 與當地居民溝通</li> <li>• Submission of the environmental reports 提交環境報告</li> <li>• Research and inspection 調查及研究</li> </ul>

## STAKEHOLDER ENGAGEMENT 持份者參與

Stakeholders 持份者	Expectations 期望	Management's Means of Response/Communication 管理層響應／溝通方式
<b>Industry</b> 行業	<ul style="list-style-type: none"> <li>Promotion of industrial developments 促進行業發展</li> </ul>	<ul style="list-style-type: none"> <li>Participation in industry forums 參與行業論壇</li> <li>Field visits 考察互訪</li> </ul>
<b>Employees</b> 員工	<ul style="list-style-type: none"> <li>Safeguarding rights and interests 權益維護</li> <li>Occupational health 職業健康</li> <li>Remuneration and benefits 薪酬福利</li> <li>Career development 職業發展</li> <li>Humanistic care 人文關懷</li> </ul>	<ul style="list-style-type: none"> <li>Staff communication meetings 員工溝通會</li> <li>Company internal journal and intranet 公司內刊和內部網絡</li> <li>Trainings and workshops 培訓與工作坊</li> <li>Employee activities 員工活動</li> </ul>
<b>Community and the public</b> 社區及人民	<ul style="list-style-type: none"> <li>Improvement in the community environment 改善社區環境</li> <li>Participation in public welfare 參與公益事業</li> <li>Openness and transparency of information 信息公開透明</li> </ul>	<ul style="list-style-type: none"> <li>Company website 公司網站</li> <li>Company announcements 公司公告</li> <li>Media interviews 傳媒採訪</li> <li>Social media platforms 社交媒體平台</li> </ul>

## MATERIALITY ASSESSMENT

Listening to stakeholders' opinions is indispensable for the Group to develop ESG strategies. In addition to the communication channels as mentioned above, we also collect the views and expectations of our management and employees on ESG-related issues through internal questionnaires to gain a deep understanding of the importance of different types of sustainability issues to the Group's development. Upon analysis of the information and data collected therein, while taking into account the materiality maps provided by well-known external institutions including the ESG Industry Materiality Map by MSCI and the Materiality Map by Sustainability Accounting Standards Board (SASB), and with the assistance from third-party ESG consultants, ESG issues of higher relevance and importance to the Group will be screened out and prioritized to enable the Group to make appropriate resource allocation and ESG risk management.

## 重要性評估

對本集團而言，聆聽持份者的聲音與制訂 ESG 策略的關係密不可分。除了上述所列的溝通渠道外，我們亦通過內部問卷調查以收集管理層及員工對 ESG 相關議題的看法及期望，深入了解不同類別的可持續發展議題對集團發展的重要性。當中所收集的資料及數據經分析後，將結合知名外部機構提供的重要性圖譜(包括明晟(MSCI)的環境、社會及管治行業重要性圖譜及可持續發展會計準則委員會(SASB)的重要性圖譜)，並在第三方環境、社會及管治顧問的協助下篩選出對本集團而言關聯性及重要性較高的 ESG 議題，釐定 ESG 議題的優先次序，以便集團作出更合適的資源分配及 ESG 風險管理。

Aspects 範疇	Material issues 重要議題
<b>Environmental protection</b> 環境保護	<ul style="list-style-type: none"> <li>Resources and emissions management 資源及排放管理</li> <li>Environmental compliance 環境合規</li> <li>Green building opportunity 綠色建築機會</li> <li>Physical effects of climate change 氣候變化帶來的物理影響</li> </ul>
<b>Employment compliance</b> 僱傭合規	<ul style="list-style-type: none"> <li>Health and safety 健康與安全</li> <li>Employment compliance 僱傭合規</li> </ul>
<b>Operations management</b> 營運管理	<ul style="list-style-type: none"> <li>Product quality control 產品質量管理</li> <li>Operational compliance 營運合規</li> <li>Customer privacy protection 客戶私隱保護</li> <li>Anti-corruption 反貪污</li> </ul>

# ENVIRONMENTAL PROTECTION

## 環境保護

### ENVIRONMENTAL MANAGEMENT SYSTEM

The Group understands the impact of the development and operation of real estate projects on the environment and attaches importance to the relationship between real estate development and sustainable development of the environment. Therefore, the Group strictly complies with the national laws and regulations on environmental protection in each of its development projects, including the Environmental Protection Law of the People's Republic of China (《中華人民共和國環境保護法》), the Environmental Impact Assessment Law of the People's Republic of China (《中華人民共和國環境影響評價法》), the Law of the People's Republic of China on the Prevention and Control of Atmospheric Pollution (《中華人民共和國大氣污染防治法》), the Law of the People's Republic of China on the Prevention and Control of Solid Waste Environmental Pollution (《中華人民共和國固體廢物污染環境防治法》), the Law of the People's Republic of China on the Prevention and Control of Noise Pollution (《中華人民共和國環境噪聲污染防治法》), the Law of the People's Republic of China on the Prevention and Control of Water Pollution (《中華人民共和國水污染防治法》), the Law of the People's Republic of China on Conserving Energy (《中華人民共和國節約能源法》) and other laws promulgated by the National People's Congress of the People's Republic of China, and also abides by the administrative regulations promulgated by the State Council of the People's Republic of China, including the Administrative Regulations on Environmental Protection for Development Projects (《建設項目環境保護管理條例》), the Detailed Rules for the Implementation of the Law of the People's Republic of China on the Prevention and Control of Water Pollution (《中華人民共和國水污染防治法實施細則》), the Regulations of the People's Republic of China on Natural Reserves (《中華人民共和國自然保護區條例》) and other regulations related to environmental protection and environmental hygiene. The Group proactively fulfills its corporate responsibility for environmental protection and has formulated the Environmental Protection Management System of Sanxun Group (《三巽集團環境保護管理制度》) to prevent environmental pollution caused during the development and construction of projects from the top down to the greatest extent possible and protect the health of its employees and customers.

During the Year, the Group did not have any identified incidents or complaints on non-compliance with environment-related laws and regulations.

### 環境管理制度

本集團明白房地產項目開發與營運的過程對環境所造成的影響，亦重視房地產開發與環境可持續發展的關係。因此，本集團在各個開發項目都嚴格遵守國家所立的环境保護法律及規定，包括中華人民共和國全國人民代表大會所頒佈的《中華人民共和國環境保護法》、《中華人民共和國環境影響評價法》、《中華人民共和國大氣污染防治法》、《中華人民共和國固體廢物污染環境防治法》、《中華人民共和國環境噪聲污染防治法》、《中華人民共和國水污染防治法》及《中華人民共和國節約能源法》等相關法律，也會遵從中華人民共和國國務院所頒佈的行政法規，包括《建設項目環境保護管理條例》、《中華人民共和國水污染防治法實施細則》及《中華人民共和國自然保護區條例》等與環境保護和環境衛生有關的規章。本集團積極履行企業環境保護責任，並制定了《三巽集團環境保護管理制度》，從上而下盡最大力度防治在項目開發及施工過程中所造成的環境污染，保護員工及顧客健康。

在本年度內，本集團並沒有已確定之違反環境相關法律法規事件或申訴。

In addition to strict compliance with relevant laws and regulations, the Group has also formulated an environmental protection management system to regulate the prevention and management of environmental pollution arising from the development and production activities of the Group and its units, so as to implement environmental protection and management at all levels, improve the quality of urban and rural environment and protect the health of employees. Each year, the Group will delegate the environmental protection and environmental hygiene prevention and control targets to each unit and incorporate the performance of units across the Group into the annual performance assessment index system, and all departments of the Group will work together and cooperate with each other to achieve the goal of environmental protection.

除了嚴格遵守相關法律法規外，本集團也制定了環境保護管理制度來規範了集團及其轄下的各單位在開發、生產活動過程中環境污染防治和管理，在各個層面落實環境保護及管理的工作，改善城鄉環境質量及保障職工健康。本集團每年會把確立的環境保護和環境衛生的防治目標下達各單位，並把本集團上下各單位的表現納入年度業績考核指標體系。而本集團各個部門也會攜手合作，互相配合，共同實踐環境保護的目標。

<p><b>Technical management department:</b> 技術管理部門：</p>	<p><b>Engineering management department:</b> 工程管理部門：</p>
<p>Responsible for providing technical support for environmental protection and governance, and controlling the effectiveness of its implementation 負責提供環境保護和治理的技術保障，並控制其實施的有效性</p>	<p>Responsible for implementing environmental protection measures during the construction and production, coordinating the relationship between environmental protection and production, and inspecting, supervising and handling the implementation of measures for the daily management of environmental protection and environmental hygiene 負責在施工生產過程中落實各項環境保護措施，協調好環境保護與生產的關係；及負責對環境保護與環境衛生日常管理各項措施實施的檢查、監督與處理</p>
<p><b>General management department:</b> 綜合管理部門：</p>	<p><b>Other management departments:</b> 其他管理部門：</p>
<p>Responsible for providing eco-friendly materials and labor protective supplies that meet the requirements of environmental protection standards and specifications 負責提供符合環境保護標準、規範要求的環保物資及勞防用品</p>	<p>Responsible for the management of education and training, special expenses for environmental protection, etc. 分別負責環境保護的教育培訓、專項費用等管理</p>

## ENVIRONMENTAL PROTECTION

### 環境保護

Summary of Environmental Objectives and Implementation Plans of the Year:

本年度環境目標與實踐計劃總匯：

Aspects 範疇	Objective 目標	Implementation Plan 實踐計劃
<b>GHG</b> 溫室氣體	To promote low-carbon development by minimizing energy consumption, increasing the efficiency of resource use and reducing GHG emissions. 推動低碳發展，盡可能節約能耗，並提高資源使用效益，減少溫室氣體排放。	<ol style="list-style-type: none"> <li>1. Encourage employees to travel in a low-carbon way and take public transportation as much as possible 鼓勵員工低碳出行，盡量使用公共交通工具</li> <li>2. Encourage employees to reduce carbon emissions by saving paper, reducing the use of plastic bags and air conditioning, etc. 鼓勵員工以節約紙張、減少使用塑料袋、減少空調使用頻率等方式降碳</li> <li>3. Encourage tree planting 鼓勵植樹</li> <li>4. Strengthen the research and practice on green buildings 加強綠色建築的研究和實踐</li> </ol>
<b>Waste</b> 廢棄物	To promote waste reduction at source and waste recycling for rational waste disposal 推動源頭減廢，並提倡廢棄物回收利用，促進廢棄物合理處置	<ol style="list-style-type: none"> <li>1. Provide training on disposal of construction waste 提供建築廢棄物處理培訓</li> <li>2. Encourage contractors to recycle construction materials 鼓勵各承包商對建築材料回收資源化</li> <li>3. Encourage waste sorting at construction sites to increase the recycling rate 鼓勵於施工現場進行廢棄物分類，提升資源回收率</li> <li>4. Encourage the less use of disposable items such as tableware 鼓勵減少一次性物品的使用，如餐具等</li> </ol>

Aspects 範疇	Objective 目標	Implementation Plan 實踐計劃
<b>Use of Energy</b> 能源使用	To promote the rationalization of energy use and increase the use of renewable energy 推動能源使用合理化，增加可再生能源的使用	<ol style="list-style-type: none"> <li>1. Strengthen natural ventilation and install fresh air equipment to reduce energy consumption of air conditioning as much as possible 加強自然通風，安裝新風設備，盡量節約空調能耗</li> <li>2. Raise employees' awareness of environmental protection and reduce the consumption of non-essential resources 提升員工環保意識，減少非必要的資源耗用</li> <li>3. Use energy-saving equipment 使用節能設備</li> </ol>
<b>Use of Water</b> 水資源使用	To promote rationalization of water use and minimize water wastage 推動水資源使用合理化，盡量減少水資源浪費的情況	<ol style="list-style-type: none"> <li>1. Post "Save Water" reminders in offices and construction sites 於辦公室及工地張貼「節約用水」提示標語</li> <li>2. Install water recycling devices and regularly check the water supply network 安裝水資源循環利用裝置，並定期檢查供水管網</li> </ol>



## EMISSIONS MANAGEMENT

The Group is committed to optimizing its overall emissions management system and has adhered to the concept of green development during the course of real estate development and construction. Meanwhile, it strives to reduce waste generation and energy consumption in business operation, so as to realize the goals of energy conservation and emission reduction and low-carbon operation. The Group, in addition to pursuing business development, also proactively reviews policies on environment protection to make efforts in improving its performance on environmental sustainability.

### Wastewater and Waste management

The Group's daily office operations discharge only general sewage without industrial sewage while the Group's construction sites discharge wastewater. For drainage management in construction sites, the Group has formulated clear guidelines to prevent the outflow of muds, sewages and wastewaters as well as the blockage of the sewers and drainage rivers, and implemented "Secondary sedimentation and Tertiary discharge". The Group also requires contractors having a practicable "General Drainage Plan of the Project" in place before commencement of construction. Contractors should apply for wastewater discharge permit from the municipal environmental protection department before construction, set up drains according to the discharge sites provided by the relevant government departments to ensure reasonable slope of drains and unobstructed drains and sewers, and set up sedimentation tanks besides the discharge sites. Domestic water used in construction sites should be discharged to the effluent treatment plant for treatment through the municipal sewage pipes after being discharged to the bilge well through a simple septic tank; other rainwater and underground drainage should be discharged to the bilge well after being through a sedimentation tank. The construction water must be conserved and strictly prohibited waste resulting from not turning off taps.

## 排放管理

本集團致力優化集團整體的排放管理系統，在房地產開發及施工建造的過程中秉承綠色發展的理念，同時在業務經營的過程中減少廢物製造及能源使用，實踐節能減排及低碳營運的目標，在追求業務發展的同時也積極檢討環保方面的政策，努力改善本集團在環境可持續發展的表現。

### 廢水及廢棄物管理

本集團的日常辦公室營運只產生一般污水排放，並不產生工業污水。而本集團的施工現場則會產生廢水。就施工現場的排水管理，本集團已訂立清晰指引防止泥漿、污水、廢水外流以及堵塞下水道和排水河道，實行「二級沉澱、三級排放」，並規定承建商在項目開工以前，必須有一份可以付諸實施的《項目總排水平面圖》。而承建商在進場施工前必須向市政環保部門申請污水排放許可證，並根據相關政府部門所提供的排污點設置排水溝，確保其坡向合理，排水溝及下水道通暢；並在排污點附近設沉澱池。而在施工現場所使用的生活用水則需經簡易化糞池排向污水井，然後再通過市政污水管網排放至污水處理廠處理；其它雨水、地下排水等則需經沉澱池才能排向污水井。而施工用水必須節約，嚴格禁止不關水龍頭的隨意浪費。

In order to achieve the annual targets of waste reduction at source and waste recycling for rational waste disposal, the Group has implemented a series of plans and waste reduction promotion activities, including waste disposal training for construction personnel, encouraging contractors to recycle construction materials and designating separate areas for different construction wastes sorted and recycled at construction sites to minimize waste generation and increase the recycling rate. In addition, the Group actively reduces the generation of domestic waste by encouraging employees to reduce the use of disposables.

The non-hazardous wastes generated in the Group's offices is mainly general office waste, where waste separation bins are set up to collect recyclables such as waste paper, metal and plastic. All non-hazardous wastes will be collected, disposed of and recycled in a proper and lawful way. In addition, hazardous wastes such as used ink cartridges and batteries generated by the Group's staff during the course of office work will be collected and stored separately before treatment by qualified professional companies.

For waste management measures in construction sites, the Group will review the "General Construction Layout Plan" submitted by contractors before the commencement of all construction projects to ensure all construction facilities (including construction materials, prefabricate components and construction facility components) are sorted and stacked neatly in the specified location. Remaining equipment used during the construction and formworks, scaffolding rods, remnants and waste materials dismantled at sites should be cleaned up and recycled at once, while the nails should be pulled out or bent before collectively sorting and stacking for recycling by qualified recyclers. Solid wastes during construction are mainly from domestic waste and construction waster of the construction workers, such as stones, concrete blocks, bricks, stone pieces, stone chips, yellow sand, and lime and scrap timber. For domestic waste generated by construction workers in the residential area should be bagged and sorted, which will be cleaned up by sanitation workers on a daily basis and collectively sent to the designated dumping area. The domestic waste generated from residential buildings and public facilities of projects in operation period will be transported by sanitation department regularly to minimize the negative impact on the surrounding environment.

為實現推動廢棄物源頭減廢、回收利用及合理處置之年度目標，本集團已實行一系列計劃與減廢宣傳工作，包括對施工人員進行廢棄物處理培訓、鼓勵各承包商對建築材料回收資源化、在施工現場劃分不同建築廢棄物的分類放置及回收區域，盡可能減少廢棄物的產生並提高資源回收率。此外，本集團也透過鼓勵員工減少使用一次性物品，積極減少生活廢物的產生。

本集團辦公室所產生的無害廢棄物主要為一般辦公廢物，辦公室內亦設有垃圾分類回收筒以回收廢棄紙張、金屬及塑料等可回收物。所有無害廢棄物將通過適當及合法之方式收集、處置及回收。另外，本集團員工辦公過程中也會產生廢舊墨盒及電池等有害廢棄物，本集團會進行單獨收集存放，並交由有資質的專業公司進行處理。

就施工現場的廢物管理措施，本集團在所有施工項目開始前都會審核承建商所遞交的《施工總平面佈置圖》，確保所有的建設施工器材（包括建設材料、預制構件、施工設施構件等）都按照規定的地點分類堆放整齊穩固，而作業中使用剩餘器材及現場拆下來的模板、腳手架桿件和餘料、廢料等都應隨時清理回收，並且將釘子拔掉或者打彎再分類集中堆放，讓合規的回收商進行回收工作。施工期間的固體廢棄物主要來源於施工人員生活垃圾和建築垃圾，如：石子、混凝土塊、磚頭、石塊、石屑、黃沙、石灰和廢木料等。針對生活垃圾，施工人員居住區的生活垃圾要實行袋裝化分類，每天由清潔員清理，集中送至指定堆放點。而在營運期項目居民樓、公建配套產生的生活垃圾則由環衛部門定期清運，致力把對周圍環境的負面影響降到最低。

## ENVIRONMENTAL PROTECTION 環境保護

### Management of Waste Gas and GHG Emissions

Greenhouse gas (“GHG”) emissions from the Group’s daily office operations can be divided into three scopes. The emissions within Scope 1 come from direct emissions, i.e., fuel consumption emissions from vehicles; the emissions within Scope 2 come from energy indirect emissions, i.e., emissions from purchased electricity; and the emissions within Scope 3 come from other indirect emissions, including emissions from business travel by airplane, electricity consumption for water and sewage processing, and disposal of waste paper at landfills.

In active respond to global carbon neutrality, the Group has developed carbon reduction targets and plans for the Year, aiming to actively encourage employees to travel and live in a low-carbon lifestyle, such as more use of public transportation to reduce the use of private cars. In addition, the Group promotes green community development by strengthening the research and practice of green buildings and encouraging tree planting. As energy consumption is one of the major sources of our carbon emissions, the Group has also set up energy targets to reduce energy consumption.

The Group has formulated a series of measures to minimize GHG emissions in the course of business operations to achieve carbon reduction. During the Year, we adopted more video conference in lieu of non-essential overseas travel, and for unavoidable business travel, we try to reduce carbon footprint from frequent airline exchanges by arranging direct flights for our employees. In addition, we encourage employees to take public transportation instead of private vehicles to commute, thereby reducing carbon emissions. Regular maintenance and upgrade are arranged for the fleet of the Company and vehicles that are old and less efficient will be disposed to reduce fuel consumption, which will ultimately reduce emissions of pollutants and GHG.

### 廢氣及溫室氣體排放管理

本集團的日常辦公室營運所產生的溫室氣體（「溫室氣體」）排放可以分為三個範疇。第一個範疇的排放來源於直接排放，即車輛的燃油消耗排放；第二個範疇的排放來源於能源間接排放，即外購電力的排放；第三個範疇的排放來源於其他間接排放，包括飛機差旅、食水和污水處理所涉及的電力消耗及處理堆填區廢紙所產生的排放。

本集團積極響應全球碳中和之目標，並訂立了本年度的減碳目標與計劃，旨在積極鼓勵員工低碳出行與生活，如鼓勵多使用公共交通工具以減少使用私家車等。此外，本集團透過加強綠色建築的研究和實踐與鼓勵植樹，提倡社區綠色發展。能源使用為本集團碳排放主要源頭之一，故此本集團同時訂立能源目標，致力降低能耗。

本集團已制定了一系列的措施，盡可能減少在業務經營過程中的溫室氣體排放，以實現減碳目標。本年度，我們增加了使用視頻會議的頻率以取代非必要的海外公幹；而就不可避免的商務旅行，我們會盡量為員工安排直航來減少頻繁轉機所增加的碳足跡。此外，我們也會鼓勵員工多使用公共交通工具通勤，減少使用轎車以降低碳排放。我們也會定期為公司的車隊進行保養及升級，淘汰掉古老及效能較低的汽車，以減少耗用燃料及降低污染物和溫室氣體的排放。

For air emissions generated during the construction and operation, the Group completes the Environmental Impact Registration Forms of Construction Projects (《建設項目環境影響登記表》) before the commencement of all development and construction projects of land parcels to ensure that the construction projects comply with the requirements of the Administrative Measures on Filing of Environmental Impact Registration Forms of Construction Projects (《建設項目環境影響登記表備案管理辦法》). For example, the vehicles exhaust generated in underground garage is discharged to the atmosphere through the exhaust system of the underground garage after being ventilated within the natural ventilation system; the cooking smoke and burnt gas from residential buildings are discharged to the atmosphere through a dedicated exhaust pipe after being treated by de-exhausting oil hoods; dust and exhaust from construction machinery and transportation vehicles that generated during construction and discharged directly into the air, are also managed as appropriately, such as spraying water to reduce dust and using construction machinery consuming less fuel.

## USE OF RESOURCES

The Group's energy consumption from its daily office operations is mainly classified into direct energy consumption and indirect energy consumption. Direct energy consumption represents combustion of fossil fuels in vehicles, while indirect energy consumption refers to purchased electricity. During the Year, with the aim of the rationalization of energy use, the Group has strived to achieve energy saving and carbon reduction by raising employees' awareness of environmental protection and adding energy-saving equipment and encouraging employees to reduce non-essential resource consumption so as to achieve the goal of energy-saving and carbon reduction. In order to achieve the goal, the Group is committed to reducing the consumption of environmental and natural resources and improving the energy efficiency of buildings, and developing a series of measures to optimize the utilization rate of resources caused by our operations.

針對施工期及營運期所產生的廢氣排放，本集團在所有地塊開發建設項目開工以前都會填報《建設項目環境影響登記表》，確保建設項目符合《建設項目環境影響登記表備案管理辦法》的規定。例如在地下車庫產生的汽車尾氣採取自然通風系統通風措施後通過地下車庫排風系統排風排放至大氣環境中；居民樓產生的油煙廢氣、燃燒廢氣採取脫排油煙機處理措施後通過專用的排煙通道排放至大氣環境中；施工期間產生的粉塵以及施工機械和交通運輸車輛尾氣採取科學管理、灑水抑塵，選用耗油低的施工機械等措施後通過無組織排放至大氣環境中。

## 資源使用

本集團於日常辦公室營運的能源消耗主要分為直接能源消耗及間接能源消耗兩大類別。直接能源消耗即車輛燃燒的化石燃料，而間接能源消耗即是購買電力。本年度，本集團以推動能源使用合理化為目標，致力透過提升員工環保意識與增添節能設備，鼓勵員工減少非必要的資源耗用，達致節能降碳。本集團為實現目標，致力減少對環境及天然資源的消耗及提升建築物能源效率，並制定了一系列措施以優化經營活動所造成的資源浪費。

## ENVIRONMENTAL PROTECTION

### 環境保護

In respect of the electricity consumption, the Group purchases electronic equipment with energy efficiency labels, and calculates monthly electricity consumption to monitor the electricity consumption of each office in the Group and then make corresponding improvement measures to conserve electricity, such as posting notices to remind employees to turn off the lights and electronic devices not in use or set sleep mode for computers unoccupied. In addition, we make full use of daylight in our offices and regularly clean the lighting fixtures and lamps to keep their original brightness and maximize their energy efficiency. Lightings separately controlled in different office areas and with high energy efficiency (e.g. T5 fluorescent lamps and light-emitting diodes) are adopted to conserve electricity.

In respect of the office resources consumption, the Group encourages the staff to reuse paper or adopt double-sided printing if possible, regularly monitors the number of prints and sets printing quotas for users where feasible, so as to reduce paper consumption. The Group's procurement department also tries to purchase printing paper, toilet paper and tissue made of recycled materials, while the administration department regularly conducts statistics on the amount of paper in order to monitor paper consumption and take appropriate improvement measures. During the holidays, we adopt e-cards as much as possible for business congratulations and promotion to reduce paper consumption.

In respect of the water consumption, the Group has no problems in obtaining suitable water sources. The Group's annual goal is to promote the rationalization of water use and reduce water waste. In order to achieve it, the Group regularly conducts leakage tests on concealed water pipes and inspects overflowing water tanks, and regularly checks the readings of water meters and checks for hidden water leakage. If there are any signs of water leakage during the inspection, we will arrange for repairs immediately to reduce the potential leakage and water wastage. We also post water-saving reminders in the washrooms of each office to encourage staff to turn off the taps after washing their hands.

就電力資源使用而言，本集團會盡量購買具有能源效益標籤的電子設備，也會每月進行電量統計，以監控集團各個辦公室的用電情況，並作出相應的改善措施以節約用電。例如我們會張貼告示，提醒員工不使用辦公室時關掉電燈，並於非工作時間把電子設備完全關掉或設定電腦閒置時進入睡眠模式。我們於辦公室盡量使用日光照明，也會定期清潔照明裝置及電燈，保持照明裝置的亮度，盡量提高其能源效率。而在辦公室的不同照明區域，我們也設立可獨立控制的照明開關，並採用高能源效益的燈具（例如T5螢光燈及發光二極管）以節省耗電量。

就辦公室資源消耗而言，本集團鼓勵員工盡可能重複使用或雙面使用紙張，並會定期監察打印數量及在可行情況下為使用者設定打印限額以減少紙張的消耗。本集團採購部也會盡量購買含再造物料的打印紙、衛生紙及紙巾；而行政部會定期進行紙量統計，以監控耗紙情況，並作出適當改善措施。在節日期間，商業賀喜和宣傳會盡量使用電子賀卡以減低紙張的消耗。

就水資源的消耗而言，本集團於求取適用水源上沒有任何問題。本集團以推動水資源使用合理化且減少水資源浪費為年度目標。為實現目標，本集團已定期進行隱蔽水管滲漏測試及檢查滿瀉的水缸及定期檢查水表讀數及有無隱蔽的漏水現象，若在過程中發現有任何漏水的跡象，我們會立刻安排維修，減低漏水的隱患及水源浪費。我們也在各個辦公室的洗手間內張貼節約用水提醒標貼，鼓勵員工在洗手後關緊水龍頭。



## RESPONDING TO CLIMATE CHANGE

Climate change is the most important and urgent challenge to our environment today, with far-reaching impacts on the economy, society and the natural environment. Therefore, the Group takes a positive approach to address the risks and opportunities brought about by climate change. On the one hand, it proactively identifies the impact of climate change and formulates strategies to reduce the risks it faces; on the other hand, it proactively reduces the negative impact of the Group's operations on climate and the environment. In view of the global trend and in line with national development, the Group will set emission reduction targets and conduct emission reduction in a gradual and progressive manner in response to China's 14th Five-Year Plan and the "Double Carbon Target", aiming to peak carbon dioxide emissions by 2030 and achieving carbon neutrality by 2060.

The Group understands that extreme weather caused by climate change, such as typhoons, rainstorms, droughts, floods, wildfires and heat waves, will increase in frequency and severity, and will impose burdens on the Group's operations. Therefore, the Group will regularly identify, assess, manage and monitor climate-related risks, and formulate emergency response plans in compliance with the Law of the People's Republic of China Addressing Climate Change, the Emergency Response Law of the People's Republic of China, the Flood Control Law of the People's Republic of China, the Law of the People's Republic of China on Protecting Against and Mitigating Earthquake Disasters and other national laws and regulations. For example, the Group has formulated a dredging plan for extreme weather events caused by climate change to ensure that employees and on-site workers are properly arranged to protect their health and safety.

The Group will periodically conduct subsequent relevant risk assessments to identify the vulnerability of business operations with climate-related risks. For instance, we will conduct simulation tests and evaluations before the development of a real estate project to determine the level of climate risk tolerance and the ability of individual project to cope with extreme weather, taking different types of factors into consideration, so as to reduce the operational risks of the Group. Appropriate budget will also be allocated to management of extreme weather events to avoid safety incidents and unnecessary economic losses as possible as we can.

## 應對氣候變化

氣候變化是現今環境最重大迫切的挑戰，對經濟、社會及自然環境均帶來深遠的影響。因此，本集團採取積極的態度應對氣候變化所帶來的風險及機遇，一方面主動開展氣候變化影響識別的工作，並制定應對策略以減低集團所面對的風險；另一方面主動減少集團營運對氣候及環境所造成的負面影響。環顧全球趨勢及配合國家發展，本集團將循序漸進訂立減排目標及開展減排工作，以響應中國「十四五」規劃和「雙碳目標」，力爭在2030年前二氧化碳的排放量達至峰值，目標爭取在2060年前實現碳中和。

本集團明白氣候變化所導致的極端天氣，例如颱風、暴雨、乾旱、洪水、山火和熱浪等發生的頻率及嚴重性將會增加，並會對集團營運帶來負擔。因此，本集團將定期識別、評估、管理及監察氣候相關風險，並謹遵《中華人民共和國應對氣候變化法》、《中華人民共和國突發事件應對法》、《中華人民共和國防洪法》、《中華人民共和國防震減災法》及其他全國性法律及法規制定緊急應變計劃，例如制定針對由氣候變化所引致的極端天氣事件的疏導計劃，確保員工及現場工作人員得到妥善安排，保障員工的健康安全。

本集團將定期進行其後相關風險評估，以識別具有氣候相關風險的業務營運的脆弱程度，例如在房地產項目開發前進行模擬測試評估，判斷個別項目可承受氣候風險的水平及應對極端天氣的能力，將不同類別的因素納入考量，減低集團的營運風險，也會將適當的預算增撥至管理極端天氣事件，盡最大力度避免安全事故及不必要的經濟損失。

The Group understands that extreme weather events have become more frequent in recent years, so we are actively exploring countermeasures to add climate-resilient elements to real estate projects. For example, we will enhance the resilience of the building's physical structure through design and proper maintenance to enhance the project's resilience to extreme weather. We also provide comprehensive insurance coverage for property and other assets that are easily damaged or destroyed due to extreme weather or other physical impacts caused by climate change. In addition, we also regularly assess climate-related risks in our supply chain, and if our suppliers are located in flood-prone areas, we may seek alternative sources of supply. In the future, the Group will deepen cooperation with professionals and experts in the field to understand innovative and low-carbon technologies and their investment risks. Changes in weather patterns may lead to changes in consumer demand. For example, people may be more inclined to purchase low-carbon, green and healthy products or services. Such changes may lead to changes in the income composition of the Group. Therefore, we will regularly review the Group's green development strategy, and try our best to support new standards for green buildings of the state and the real estate industry, so as to contribute to reducing carbon emissions and tackling climate change. At the same time, the Group will invest in more green building development projects in the future, and will maintain its market competitiveness while addressing climate change.

本集團明白隨著極端天氣事件近年有變得頻密趨勢，因此我們正積極研究應對方案，務求能在房地產項目中增添具氣候抗禦力的元素，例如透過設計和適當的維修保養，提升樓宇物理結構的適應力以增強項目應付極端天氣的韌性；也會為容易受極端天氣破壞或其他由氣候變化引起的實體影響損害之財產和其他資產提供全面的保險；亦會定期評估供應鏈中與氣候相關的風險，如供應商位於水災容易發生的區域，我們或會尋求其他可替代的供應來源。未來，本集團會深化與專業人士和領域專家的合作，以了解創新和低碳技術及其投資風險。天氣模式改變或會引致消費者需求轉變，例如其會更傾向於選購低碳、綠色和健康的產品或服務，而有關轉變可能會導致本集團收入組合產生變化，因此我們會定期審視本集團的綠色發展策略，盡最大力度支持國家及房地產行業對綠色建築的新標準，為減碳及應對氣候變化出一分力。與此同時，本集團未來將會投放更多資於綠色建築的發展項目，並在致力應對氣候變化的同時保持其市場競爭力。



# EMPLOYMENT COMPLIANCE

## 僱傭合規

### EMPLOYMENT COMPLIANCE AND LABOR STANDARDS

Talents are the driving force for the sustainable development of an enterprise. The Group is committed to optimizing its internal human resources management system, and strictly abides by relevant laws and regulations such as the Labor Law of the People's Republic of China, the Labor Contract Law of the People's Republic of China, the Employment Promotion Law of the People's Republic of China and the Social Insurance Law of the People's Republic of China. The human resource center of the Group has established the Recruitment Management Policy to ensure the compliance of the recruitment process based on the four major principles of "open recruitment, equal competition, fair evaluation, and merit-based recruitment". The employment process is subject to the supervision of all parties to ensure the quality of the introduced talents, and the employment of talents shall not be based on gender, sexual orientation, disability, age, race, nationality, family status or any other factors protected by the law. We will conduct background checks on employees before the onboarding process. Employees are required to provide supporting documents such as copies of their ID cards and academic qualifications to confirm whether their age, identity, educational background and appearance are consistent with the supporting documents provided, so as to avoid the employment of child labor. In the course of operation, the Group is committed to safeguarding the legitimate rights and interests of employees and creating a fair, healthy, safe and promising working environment. Labor contract shall specify the work content, labor remuneration, labor protection and labor conditions and other related labor duties and rights of employees to ensure equal employment and compliance and prevent forced labor. The Group will hold regular meetings on risk management and internal control systems to discuss and review the compliance of relevant systems to ensure that the measures are effective and to avoid child labor, forced labor, discrimination and other employment risks. In case of wrongful employment of child labor or forced labor, the Group will immediately stop their work and identify the causes, as well as taking improvement measures to avoid the recurrence of similar incidents. When an employee submits a resignation request, the human resources department arranges a resignation interview with the resigned employee before his/her last working date to understand the reason for his/her resignation, and to discover the shortcomings of the Group's human resources management and make improvements.

### 僱傭合規及勞工準則

優秀的人才 是推動企業可持續發展的原動力，本集團致力優化內部人力資源管理體系，並嚴格遵守《中華人民共和國勞動法》、《中華人民共和國勞動合同法》、《中華人民共和國就業促進法》及《中華人民共和國社會保險法》等相關法律和法規。本集團人力資源中心已設立《招聘管理制度》，以「公開招聘、平等競爭、公正評價、擇優錄用」四個大原則確保招聘的過程合規，而僱傭過程接受各方監督，確保引進人才質量，堅決不以性別、性取向、殘疾、年齡、種族、國籍、家庭狀況或其他任何受法律保護的因素作為人才僱傭依據。員工於入職前會進行背景調查，並需提供身份證、學歷複印件等證明文件確認其年齡、身份、學歷及相貌等與其提供的證明文件是否一致，避免僱用童工。而在營運的過程中，本集團致力維護員工的合法權益和締造公平、健康、安全及具發展潛力的工作環境，員工的工作內容、勞動報酬、勞動保護和勞動條件等相關勞工職責與權益均在勞動合同上清晰列明，確保僱傭平等合規及防止強制勞工。本集團的風險管理及內部監控系統會舉行定期會議，討論及檢視相關制度的合規情況，確保措施行之有效，避免童工、強迫勞動與歧視等僱傭風險。如發現錯雇童工或強制勞工的情況，本集團會立即停止其工作，並查明原因且採取改善措施，避免再次出現同類事件。當員工提出離職要求時，人力資源部門在請辭員工最後工作日期之前，安排與其進行離職訪談，以了解其離職原因，發掘集團在人力資源管理上的短板並作出改善。

## HEALTH AND SAFETY

The Group recognizes that protection of employee's occupational health and safety are fundamental to maintaining corporate operations. As a responsible property developer, the Group strictly complies relevant regulations of the jurisdictions where it operates, including the Law of the People's Republic of China on Prevention and Control of Occupational Diseases (《中華人民共和國職業病防治法》), the Production Safety Law of the People's Republic of China (《中華人民共和國安全生產法》), the Regulations on Safety Production Management of Construction Projects (《建設工程安全生產管理條例》), has established internal guidelines including the Management System of Safety Production (《安全生產管理制度》), the Guide on Emergency Response to Safety Accidents (《安全事故應急工作指引》), the Operation Guidelines on Safe and Civilized Construction Management (《安全文明施工管理作業指引》) and the V2.0 Operation Guidelines on Safe and Civilized Construction (《安全文明施工作業指引2.0版》), and regularly arranges safety hidden hazard inspection and safety risk screening for every project under construction in a bid to provide employees and contractors with safe and compliant working places and protecting employees from occupational diseases.

### Project Construction Safety

The Group continuously improves safety and protection measures for employees with the aim of enhancing the management level and awareness in respect of safe and civilized construction of projects under construction and ensuring construction safety up to standards. The Group has issued a series of operation-related guidelines in relation to safe and civilized construction, and has strived to improve work conditions, protect workers' safety, and prevent the occurrence of injury or death accidents. For instance, the V2.0 Operation Guidelines on Safe and Civilized Construction sets forth detailed guidelines like the operation specifications, standards and processes guiding safety protection in earthmoving projects, artificial dig-hole pile projects, scaffold operations, edge and portal operations, work at height operations and electricity use safety, thereby ensuring that construction projects are in compliance with relevant safety technologies and requirements. In the event that any issues in safety management system or any hidden safety hazards at construction sites are identified in a construction entity, the supervising company will cause the construction entity make rectifications and improvements until it meets standards and reports the situation to project company in a timely manner.

## 健康與安全

本集團深明保障員工的職業健康與安全是維持企業營運不可忽視的一環，作為負責人的房地產開發商，本集團恪守營運所在地的司法管轄區的相關法規，包括：《中華人民共和國職業病防治法》、《中華人民共和國安全生產法》及《建設工程安全生產管理條例》等，並建立了《安全生產管理制度》、《安全事故應急工作指引》、《安全文明施工管理作業指引》及《安全文明施工作業指引2.0版》等內部指引，也會定期對各個正在施工的項目進行安全隱患排查及安全風險排查，致力為員工及承包商員工提供安全合規的工作場所，保障僱員免受職業病的危害。

### 項目施工安全

本集團不斷完善對員工的安全及保障措施，提高在建項目的安全文明施工管理水平及意識，確保施工安全達標。本集團內部已推出一系列與安全文明施工作業相關的指引，努力改善勞動條件及保障勞工安全，盡最大力量防止傷亡事故發生。例如在《安全文明施工作業指引2.0版》中列出了詳細指引，指導土石方工程安全防護、人工挖孔樁的安全防護、腳手架作業安全防護、臨邊與洞口作業安全防護、高處作業安全防護及用電安全等操作規範標準和流程，確保建築工程符合相關安全技術規定。倘若在施工單位發現安全管理體系的問題或施工現場有安全隱患的存在，監理公司會督促施工單位進行認真整改、完善直至合格並及時將情況上報項目公司。

## EMPLOYMENT COMPLIANCE

### 僱傭合規

During construction, the Group will require the project company to supervise and inspect the implementation of safe and civilized construction plans by the construction entity and make daily on-site inspections to supervise its compliance with safety, hygiene, fire safety, security requirements of all construction sites and living areas. At weekly routine supervising meetings, supervising entities, construction entities and construction departments will review safety issues and hazards during construction and address such problems identified in a timely and cooperative manner. In addition, the Group will inspect and grade the implementation of safe and civilized measures of construction entity including the inspection on safety measures for major parts and machine and equipment and record inspection results in accordance with the requirements of the Score Sheet of the Monthly Inspection on Safe and Civilized Construction of Projects (《月度工程安全文明施工檢查評分表》).

Where there is any safety accident on a construction site, the construction entity will immediately take handling measures to protect the site and notify the supervising company and the project company in a timely manner for further accident handling.

在施工期間，本集團要求項目公司監督及檢查施工單位的安全文明施工方案的實踐情況；也須進行日常現場巡視，監督各個作業地盤的施工現場及生活區符合安全、衛生、消防、保衛等規定；在每週監理例會中，監理單位、施工單位和工程部門將檢討施工中存在的安全問題及隱患，並對發現的問題及時協調配合處理。此外，本集團會按《月度工程安全文明施工檢查評分表》的要求，對施工單位的安全文明措施落實情況進行檢查並評分，檢查內容包括現場重要部位、機械設備的安全措施等，並會紀錄檢查情況。

若施工現場發生安全事故，施工單位會立刻採取現場保護處理措施，並須及時通知監理單位和項目公司，以進行進一步的事故處理。

**Handling of typical safety accidents:**

**一般安全事故的處理：**

The project company organizes the inspection of the accident, reviews the contents of the Safety Accident Reporting Form (《安全事故報告表》) submitted by the construction entity and then puts forward handling opinions to the deputy manager in charge of the project company for confirmation

項目公司組織事故調查，審核施工單位提交的《安全事故報告表》相關內容，提出處理意見並報項目公司分管副總確認

In accordance with relevant requirements of the Group, the project company shall organize and coordinate the handling of accidents, cause the supervision company and the construction entity make rectifications and improvements, and submit the Safety Accident Report (《安全事故報告》)

項目公司根據本集團有關規定，組織協調事故處理，督促監理單位、施工單位進行整改，並提交《安全事故報告》

The project company will be responsible for monitoring the implementation of handling opinions and the filing of accident reports

項目公司負責處理意見的落實及事故報告的歸檔

**Handling of major safety accidents:**

**重大安全事故的處理：**

In case of any major accident, the project company shall promptly perform emergency handling on site to prevent the situation from getting worse, and report the situation to the operations management center (運營管理中心), leaders in charge in the Group and persons in charge of relevant departments

如發生重大事故，項目公司應及時進行現場應急處理，避免事態擴大，同時上報運營管理中心、集團分管領導及相關部門負責人

The project company will organize the handling and investigation of the accident with the engagement of the operations management center

項目公司組織進行事故處理、調查，運營管理中心參與處理

The project company will coordinate the handling with competent government authorities and give notice of the handling opinions to the general manager of the project

項目公司與政府主管部門協調處理，處理意見須知會項目總經理

After the completion of accident handling, the supervising company will prepare the Safety Accident Report as required and submit it to the project company

監理單位在事故處理完畢後按要求編制《安全事故報告》報項目公司

After its finalization, the accident analysis report will be filed by the general management department of the project company and be submitted to and filed with the operations management center

事故分析報告經審定後，交項目公司綜合管理部歸檔，並將結果報送運營管理中心備案

## EMPLOYMENT COMPLIANCE 僱傭合規

During the handover of properties, the operation guidelines on safe and civilized management measures (安全文明管理措施作業指引) clearly stated that the project company shall explain the specific exit time for the construction company and the property management company to the supervising company, the construction company and the receipt time for the property management company, and cause the supervising company to classify and file technical documents, inspection and receipt records, supervising plans, supervising implementation rules, monthly supervising reports, supervising meeting minutes and relevant written notices as required.

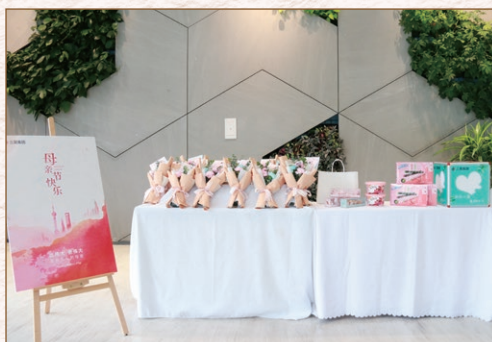
### Physical and mental health of employees

In addition to providing our employees with a safe working environment and protecting them from occupational diseases, we also organized a series of activities for our employees during the Year to promote employees' physical and mental health and enhance team cohesion. For example, on Women's Day and Mother's Day, we provided holiday benefits to female employees and gave flowers and blessings to married and child-bearing female employees. We organized Zongzi-making activities in Dragon Boat Festival. We also held birthday events and arranged games for employees who celebrated their birthdays every month. During the hot summer, we prepared watermelons, mineral water and other materials for employees working on the front line to comfort and thank them for their contributions.

在物業移交階段，安全文明管理措施作業指引明確交代項目公司須向監理單位、施工單位、物業公司明確具體的施工單位交代退場時間及物業公司接收時間；督促監理單位把有關安全生產的技術文件、驗收記錄、監理規劃、監理實施細則、監理月報、監理會議紀要及相關書面通知等按規定立卷歸檔。

### 員工身心健康

除了致力為員工提供安全的工作環境及保障僱員免受職業病的危害外，本年度我們亦舉辦了一系列的員工活動，以促進員工的身心健康及增強團隊的凝聚力。例如在婦女節和母親節，我們會為女員工發放節日福利及給已婚已育女員工送鮮花及祝福；在端午節，我們組織了包粽子的活動；也會為每月過生日的員工舉辦壽星活動及遊戲；在炎暑期間，我們會為在一線工作的員工準備消暑西瓜、礦泉水等物資，以慰勞及答謝員工的貢獻。



On Mother's Day, we gave blessings and flowers to great mothers.  
母親節，為偉大的媽媽們送上祝福與鮮花。



During the quarterly birthday "home party", the administrative department prepared delicious snacks, fun games and exquisite gifts for employees to celebrate their birthdays.  
季度生日「轟趴」，行政部門精心準備美味茶歇、趣味遊戲及精美禮品為員工慶生祝賀。

## EMPLOYMENT COMPLIANCE 僱傭合規

### Responding to the 2019 Novel Coronavirus (“COVID-19”) Epidemic

The COVID-19 epidemic (the “**Epidemic**”) spreading around the world is still raging in many places. The Group has not let down its vigilance. In order to ensure the health and safety of employees and maintain the normal operation of the Company, the Group has formulated the Emergency Plan of Sanxun Group for the Prevention and Control of the COVID-19 Epidemic, having the newly established Epidemic Prevention Leading Group to lead all departments to implement the Epidemic prevention according to the Work Plan for the Prevention and Control of the COVID-19 Epidemic in Winter and Spring issued by the National Health Commission of the People’s Republic of China (“**National Health Commission**”) and the Notice on Further Improving the Prevention and Control of the COVID-19 Epidemic in the Near Future and during the Spring Festival issued by the Epidemic Prevention Leading Group. The Group’s key prevention and control measures are as follows: strengthen ventilation in crowded areas such as office areas and restaurants; conduct regular disinfection of key places such as offices and restaurants; conduct health observation, temperature measurement and abnormal reporting on employees who commute on the day; and ensure that materials such as the masks, disinfectants, thermometers, medical alcohol, and medical gloves in the Company’s warehouse are adequately stocked and can meet urgent needs. For employees with confirmed cases or suspected cases or having contacts with confirmed cases, we visit their home to help them solve the actual difficulties they encounter, and to avoid family panic, so as to appease and stabilize employees’ emotions. The Group has cooperated with various parties to jointly overcome the difficulties during the Epidemic, so as to ensure the health and safety of employees during the Epidemic, and keep the Company’s business running.

### 應對2019新型冠狀病毒疫情

蔓延全球的新型冠狀病毒肺炎疫情(「**疫情**」)仍在多地肆虐。本集團並沒有放鬆警惕，為了確保員工的身體健康和生命安全並維護企業正常營運，本集團根據中華人民共和國國家衛生健康委員會(「**衛健委**」)所發佈的《冬春季新冠肺炎疫情防控工作方案》和防疫領導小組的《關於進一步做好近期和春節期間新冠肺炎疫情防控工作的通知》，制定了《三巽集團防控新型冠狀病毒疫情應急預案》，讓新成立的新型冠狀病毒預防工作領導小組帶領各部門貫徹落實防疫工作。本集團的重點防控措施包括：在辦公區、餐廳等人群聚集區域的加強通風換氣；對辦公室、餐廳等重點場所進行定時消毒；對當天通勤的員工進行健康觀察、體溫測量並報告異常；及確保公司倉庫的口罩、消毒液、體溫計、醫用酒精、醫用手套等物資儲備充足並能應付急時所需。對確診病例、疑似病例或接觸者員工，我們會進行家庭慰問，幫助其解決遇到的實際困難，避免員工家庭恐慌，以安撫和穩定員工情緒。本集團與多方攜手合作，共同克服疫情困境，保障員工在疫情期間的健康安全，也讓公司的業務得以持續運作。



Staff shall conduct disinfection and entry and exit registration before entering the office  
進入辦公場所做好消毒殺菌和進出登記工作



Donate protective materials to medical staff of Lixin Hospital  
向利辛醫院醫務人員捐贈防護物資



The Company's party members took the lead in distributing anti-epidemic materials on the front line during the holiday  
公司黨員同志帶頭放棄假期，身赴一線發放抗疫物資



## EMPLOYEE TRAINING AND DEVELOPMENT

The Group believes that experienced and dedicated employees are necessary elements to support the long-term development of the Company. We are committed to improving the Group's human resources system and focusing resources on talent development to further attract, retain and motivate talents, striving for a win-win situation for the Company and its employees.

The Human Resource Center of the Group has formulated the Training Management System (《培訓管理制度》) to standardize the Group's training systems, procedures and benefits, and actively provided training courses with professional qualities to its employees. For new employees, the personnel administration center holds a new employee forum to let new employees understand the Company's corporate culture, rules and regulations, project content, and OA office system operation knowledge, etc., so that new employees can adapt to the Company as soon as possible. In addition, we have also revised the Tutor Management Measures (《導師管理辦法》), so that each new employee can be led by a senior mentor to better understand the job position and project content. In addition to training new employees, the Group has also organized a series of training activities for employees of different levels and positions, such as the "Second Training of Voyage Plan (遠航計劃第二期培訓)", "Sharing Session of Sanxun Trainees (巽速生分享會)", "Dianshan Lake Hiking (澱山湖徒步活動)", "Second Training of Sanxun Sailing Plan (巽航計劃第二期培訓)" and "Annual Debriefing of and Intensive Training for Sanxun Trainees (巽速生年度述職和集中培訓)", so as to strengthen the competitiveness and internal cohesion of its employees. In addition, the Group has established Sanxun Business School to provide professional and vocational quality training according to the development needs of employees of different positions and levels. It actively carries out the construction of talent echelon to supply internally cultivated talents for its long-term development. Our management has formulated a series of internal regulations, including the "Employee Relationship Management Rules" (員工關係管理制度), "Employee Welfare Management Rules" (員工福利管理制度) and "Attendance Management Rules" (考勤管理制度), to safeguard the well-being of our employees. At the same time, the Group continues to optimize its internal organization and assessment on major performance targets, and actively improve the reward system for teams and individuals, such as the establishment of performance awards, node awards and year-end awards, etc., aiming to improve the individual performance of its employees and drive its growth.

## 僱員培訓及發展

本集團相信經驗豐富而敬業的員工是支撐企業長遠發展的必要元素，我們致力完善本集團的人力資源體系及集中資源於人才培養，以進一步吸引、挽留及激勵人才，為企業、為員工力爭雙贏局面。

為此，本集團人力資源中心已制定《培訓管理制度》，規範集團培訓的制度、流程及效益，積極為員工提供具專業素質的培訓課程。對於新入職的員工，人事行政中心會舉行新員工座談會，讓新員工了解公司的企業文化、規章制度、項目內容、OA辦公系統操作知識等，使新員工盡快適應並融入公司。此外，我們也修訂了《導師管理辦法》，讓每位新入職的員工都可以被一位資歷較深的導師帶領，更貼切的認識工作崗位及項目內容。除了給新員工培訓外，本集團也舉辦了一系列訓練活動予不同階級崗位的員工，例如「遠航計劃第二期培訓」、「巽速生分享會」、「澱山湖徒步活動」、「巽航計劃第二期培訓」及「巽速生年度述職和集中培訓」等，加強員工的競爭力及內部凝聚力。另外，本集團建立了三巽商學院，針對不同崗位、階級員工的發展需要進行專業類及職業素質類培訓，積極開展人才梯隊建設，為本集團長期發展輸送內部培養的人才。我們的管理層已制定一系列內部規定，包括「員工關係管理制度」、「員工福利管理制度」及「考勤管理制度」，以保障員工的福祉。與此同時，本集團也正持續於優化內部組織及主要績效目標的考核，並積極完善團隊及個人的獎勵體系，例如設立績效獎、節點獎和年終獎等，旨在提高員工的個人績效也驅動企業的發展。

In addition, the Group also provides sufficient promotion opportunities for its employees and has specially formulated systems concerning the promotion of employees, such as “Management Measures for Employee Promotion of Sanxun Property Group” (《三巽地產集團員工晉升管理辦法》) and “Management Rules for Performance Appraisal of Employees of Sanxun Property Group” (《三巽地產集團員工績效考核管理制度》), with a view to providing a good career development system and promotion path for its employees. The performance appraisal results will be used for giving incentives to employees by allocating bonuses to them as an encouragement and appreciation of the efforts made by high performers. Moreover, the performance appraisal results will be an important reference for the Group’s annual evaluation, talent training, position change and salary adjustment, so that employees with strength and talent can contribute to and grow together with the Group.

## EMPLOYEE WELFARE

The Group attaches great importance to the well-being of its employees and upholds a people-oriented philosophy. We are committed to providing favorable development room, competitive remuneration and welfare systems for our employees. In order to enhance employees’ sense of belonging to the Group, the Group has formulated the “Welfare Management Rules” (《福利管理制度》). In addition to statutory employee benefits, such as social insurance, housing provident fund, paid leave and high temperature subsidy, we also arrange holiday benefits and special benefits for our employees, including birthday benefits, wedding cash gifts, maternity cash gifts, consolation money for illnesses and condolences. We also provide daily subsidies, including transportation, communication, meal, computer and housing subsidies, with a view to encouraging our employees to constantly serve the Group and grow together with us.

另外，本集團亦提供充分的晉升機會予員工，特意編製了《三巽地產集團員工晉升管理辦法》、《三巽地產集團員工績效考核管理制度》等員工晉升相關制度，致力為員工提供良好的職業發展體系和晉升路徑。績效考核結果應用於員工業績激勵分配，獎金分發將鼓勵及感謝高績效的員工所付出的努力。此外，績效考核結果還將作為集團年度評優、人才培養、崗位異動、薪酬調整的重要參考依據，讓有實力有才華的員工能為企業作出貢獻，與集團共同成長。

## 員工福利

本集團十分重視員工的福祉，秉持著以人為本的精神，我們致力為提供良好的發展空間及具競爭力的薪酬待遇和員工福利制度。為了增強員工對公司的歸屬感，本集團制定了《福利管理制度》，除了法定員工福利，例如社會保險、住房公積金、帶薪休假及高溫補貼外，我們還給員工安排節日福利和特別福利，包括生日福利、結婚禮金、生育禮金、生病慰問金和慰唁金，也會提供日常補貼，包括交通補貼、通訊補貼、餐費補貼、電腦補貼及住房補貼，以激勵員工為企業長期服務，與我們共同成長。



Outdoor Development Activities  
戶外拓展活動

## OPERATIONS MANAGEMENT

### 營運管理

#### SUPPLY CHAIN MANAGEMENT

Sound supply chain management is an important condition for product quality assurance. Therefore, the Group strictly complies with the rules and regulations concerning commercial operation, real estate industry and supply chain management, including the Law of the People's Republic of China on Bid Invitation and Bidding (《中華人民共和國招投標法》), Regulations on Administration of Development and Operation of Urban Real Estate (《城市房地產開發經營管理條例》), Law of the People's Republic of China on Government Procurement (《中華人民共和國政府採購法》) and Law of the People's Republic of China on the Administration of Urban Real Estate (《中華人民共和國城市房地產管理法》), and has also formulated a series of internal procurement guidelines and supplier management rules, such as the Operating Guidelines for the Management of Supplier Resources for Cooperative Projects (《合作項目供方資源管理作業指引》), Engineering Supplier Management Rules (《工程供方管理制度》), and Management Rules for Bid Invitation and Procurement of Sanxun Group (《三巽集團招標採購管理制度》), with a view to conducting stringent quality management on suppliers. We seek to optimize the procurement process to select the most suitable suppliers, integrate corporate social responsibility into all parts of the supply chain to the utmost, and actively encourage suppliers to fulfill their corresponding corporate social responsibilities, with a view to achieving a win-win situation and creating greater value for the social environment.

#### 供應鏈管理

良好的供應鏈管理是產品質量保證的重要條件，因此本集團嚴格遵從與商業運營、房地產行業及供應鏈管理相關的規章制度，包括《中華人民共和國招投標法》、《城市房地產開發經營管理條例》、《中華人民共和國政府採購法》及《中華人民共和國城市房地產管理法》等法律法規，也制定一系列內部採購指引和供應商管理制度，例如《合作項目供方資源管理作業指引》、《工程供方管理制度》及《三巽集團招標採購管理制度》等規範，對供應商進行嚴格質量管理。我們也不斷尋求優化採購流程，從而挑選最合適的供應商，盡最大力度將企業社會責任融入到供應鏈各個環節，也會積極鼓勵供應商履行相應的社會企業責任，務求達到合作雙贏的局面，為社會環境締造更大的價值。

### Selection and Employment of Suppliers

Staying committed to improving the supply chain management system, the Group has established strict guidelines in the selection of suppliers and partners, and engaged suppliers that meet the Group's standards in accordance with the selection principles in the Management Rules for Bid Invitation and Procurement of Sanxun Group (《三巽集團招標採購管理制度》), which includes but are not limited to the following principles:

#### *Principle of transparent and fair operations*

All departments should cooperate actively and communicate comprehensively to share information, and all bidding decisions should be made collectively and publicly within the bid invitation organization to eliminate operations under the table

#### *Principle of full competition and merit-based selection*

With adequate number of bidding teams participating in bidding, the bidding units are encouraged to actively carry out fair competition to ensure that the bidding is fully competitive. The unit with full competitive advantage should be selected to win the bid

#### *Principle of integrity and honesty*

All employees involved in the bidding work should maintain their integrity and should not seek personal benefits by taking advantage of their positions or authorities. No person should influence the objective and fair evaluation of the bidding work

#### *Principle of maintaining reputation*

The shortlisted candidates should be selected, evaluated and finally determined in an objective and fair manner to create and maintain a good reputation and image of the bidding unit

#### *Principle of confidentiality*

The bidding documents of each unit, bid evaluation process and letter of intent made before the distribution of the award notice are confidential and should not be divulged or used as improper commitments. All bidding units should keep their bidding materials confidential

### 供應商篩選及聘用

本集團致力完善供應鏈管理體系，在遴選供應商及合作商的工程中制定了嚴格的指引，並根據《三巽集團招標採購管理制度》中的甄選原則，聘用符合本集團標準的供應商，當中包括但不限於以下原則：

#### *透明公正原則*

各部門積極配合、全面溝通、信息共享，所有招標決策應在招標機構內集體公開決策，杜絕暗箱操作

#### *充分競爭、擇優中標原則*

有充分適量的投標隊伍參與投標，鼓勵投標單位積極開展公平競爭，保證招標具有充分的競爭性，並應選擇具有充分競爭優勢的單位中標

#### *廉潔奉公原則*

所有與招標工作相關的員工都應保持廉潔，不得利用職務、職權之便謀求私利，任何個人不得影響招標工作客觀公正的評價

#### *維護信譽原則*

選擇投標入圍單位、評標、定標時應客觀公正，樹立並維護好招標信譽和形象

#### *保密原則*

各單位的投標文件、評標過程、未發放中標通知書前的定標意向，都是重要機密，不得洩露或作不當承諾；並且要求各投標單位對自己的投標資料保密

## OPERATIONS MANAGEMENT

### 營運管理

In addition to adhering to principles, we evaluate the environmental and social risks in our supply chain, taking into account different environmental and social factors to improve procurement efficiency and effectiveness and reduce procurement risks. We will give priority to suppliers who are certified according to internationally recognized standards related to social risk governance (e.g. SA8000 Social Accountability International Standard, Fair Trade Certification, etc.); to suppliers who closely follow internationally recognized standards related to social risk governance (e.g. ISO26000 Social Responsibility Guidelines, etc.); and to suppliers who have signed international agreements related to social risks to demonstrate our recognition of their conducts in fulfilling their social responsibilities. In addition, we require suppliers to submit social responsibility reports which include their compliance with work-related injuries, employment, and acceptance of benefits or fair competition; and require them to comply with local and international laws and regulations that prohibit bribery, corruption and other unethical business practices.

#### Evaluation on Suppliers

The Group regularly evaluates the performance of its suppliers. The scoring criteria cover quality, delivery, production capacity, compliance and other factors of its products. Only suppliers that meet the criteria can be included in the list of qualified suppliers. And suppliers are required to provide open and transparent reports which disclose their significant environmental, social and governance risks, as well as their response plans, and environmental and safety-related commitments to ensure that their products meet the Company's quality, safety and environmental standards. The Group also provides training to employees responsible for supply chain management to ensure that they have sufficient knowledge to evaluate suppliers accurately.

除了堅守原則外，本集團供應鏈中的環境及社會風險進行評估，將不同環境及社會因素納入考量，以提高採購效率和效益，並降低採購風險。我們會優先考慮具社會風險管理相關國際認可標準認證（如SA8000社會責任國際標準認證、公平貿易認證等）的供應商；優先考慮跟從社會風險管理相關國際認可標準（如ISO26000社會責任指引等）的供應商；以及已簽署社會風險相關的國際性協議的供應商，以展示我們認同其履行相關社會責任的行為。此外，我們會要求供應商提交社會責任報告書，當中包括工傷、僱傭、收受利益或公平競爭等方面的合規情況；並且需要供應商須遵守有關禁止賄賂、腐敗及其他不道德商業行為的本地及國際性法律法規。

#### 供應商評估

本集團會定期對其供應商進行績效評估，評分準則涵蓋了其產品的質量、交付情況、產能、合規情況等因素作為評審標準，只有符合標準的供應商方可加入合資格供應商名錄。而供應商須提供公開、透明的匯報，披露其重大環境、社會及監管風險，以及針對以上風險的應對方案及作出環保及安全相關的承諾，確保產品符合公司的品質、安全及環保等標準。本集團也會為負責供應鏈管理的僱員進行培訓，以確保僱員擁有足夠的知識基礎，能夠準確地審核供應商。

### Green Procurement

The Group recognizes the concept of green procurement and therefore prioritizes the purchase or selection of products and services with the minimum impact on the environment. It also gives preference to local suppliers or suppliers that are closer or more easily accessible by transportation to reduce its carbon footprint. In office operations, the Group will purchase environment-friendly products such as refillable ballpoint pens and propelling pencils and environment-friendly paper to minimize waste and advocate giving priority to purchasing products with energy efficiency labels and equipment that help reduce water consumption. The Group will continue to review its procurement principles and supplier management system and strive to improve the sustainability planning of its supply chain.

## PRODUCT RESPONSIBILITY

The Group strictly complies with the Product Quality Law of the People's Republic of China (中華人民共和國產品質量法), the Construction Law of the People's Republic of China (中華人民共和國建築法), the Regulations on the Quality Management of Construction Projects (建設工程質量管理條例) and the United Standard for Construction Quality Acceptance of Building Engineering (建築工程施工質量驗收統一標準) (GB50300-2013) and other laws and regulations. And we have developed a series of internal systems and guidelines to ensure that our products and services comply with national standards, thereby enabling customers to enjoy safe, healthy and quality goods.

### 綠色採購

本集團認同綠色採購的理念，因此在實踐的層面會優先採購或選用對環境造成最低影響的產品及服務等；也會先選擇本地供應商或地理位置距離較近或交通更方便的供應商，以減少碳足跡。在辦公室營運上，本集團會購買環保產品，例如可更換筆芯的圓珠筆和鉛芯筆、環保紙張以減少浪費，並倡議優先採購具能源效益標籤的產品和有利於減少水資源消耗的器材。本集團會持續審視採購原則和供應商管理體系，致力改善供應鏈的可持續發展規劃。

### 產品責任

本集團嚴格依照《中華人民共和國產品質量法》、《中華人民共和國建築法》、《建設工程質量管理條例》及《建築工程施工質量統一驗收標準》(GB50300-2013)等法律規章，並制定了一系列內部制度和指引來確保我們的產品和服務符合國家標準，務求讓客戶享受到安全、健康、有品質的商品。

## OPERATIONS MANAGEMENT

### 營運管理

#### Product Quality Control

The Group is committed to providing high-quality residential and property services to our customers. We place great emphasis on quality of our products and services; therefore, the Group has formulated the Construction Process and Quality Standards (施工工藝和質量標準) and the Project Quality Management Practice Guidelines (工程管理操作指引) to ensure that the construction processes are in compliance with the requirements and to ensure the quality of the projects. In addition, the Group's Customer Service Centre has formulated the Operational Guidelines on Project Delivery Risk Management (項目交付風險管理作業指引) to standardize the delivery management process, and improve delivery quality and customer satisfaction while reducing delivery risks. Specifically, before the delivery of a project, the Delivery Management Team will carry out audits, functional checks and acceptance, such as reviewing relevant documents including the Risk Investigation Report on Projects (項目風險排查報告), the Delivery Plan (交付方案), the Self-inspection, Rectification, Delivery and Maintenance Plan for Projects (工程自查整改及交付維修方案), the Pre-delivery Preparation Plan for Properties (物業交付前準備工作方案), the Rectification Report of Property Delivery and Joint Inspection and Acceptance (交樓聯合驗收檢查整改報告) and the Collective Delivery Summary Report (集中交付總結報告). Before the handover, the Customer Service Centre will coordinate with the Engineering Management Centre, Operations Management Centre, Design and Development Centre, Marketing Management Centre, Risk Control Management Centre and relevant departments to carry out joint inspections to ensure that the projects comply with the regulations and standards, and will also work with the indoor quality inspection team during the internal acceptance process to provide feedback on items requiring rectification and safety hazards to ensure that there is no damage to the property and that the property equipment is functioning normally for quality assurance. Collective Delivery Summary Report (集中交付總結報告) will be submitted one month after successful delivery to consolidate customers' needs and aftercare services and to assist them in the transition to the new home.

During the Year, the Group has not received any cases of delayed delivery or cancellation of transactions due to health and safety or quality issues of the Group's projects.

#### 產品質量控制

本集團致力提供高品質的住宅及物業服務給客戶，我們高度重視商品及服務的品質，因此本集團已制定《施工工藝和質量標準》與《工程管理操作指引》，以確保施工過程的工序均符合要求，保障工程質量水平。此外，本集團客戶服務中心制定了《項目交付風險管理作業指引》，規範交付工作管理流程，降低交付風險的同時也提高交付質量及客戶滿意度。具體而言，在項目交付前交付管理小組會進行審核、職能排查及驗收工作，例如審閱《項目風險排查報告》、《交付方案》、《工程自查整改及交付維修方案》、《物業交付前準備工作方案》、《交樓聯合驗收檢查整改報告》和《集中交付總結報告》等相關文件。在交樓前，客戶服務中心也會協調工程管理中心、運營管理中心、設計研發中心、營銷管理中心、風控管理中心及相關部門進行聯合檢查，確保工程項目合規合標，也會在內部驗收過程中聯同室內品質查驗小組反饋需要整改項目及安全隱患問題，確保物無損壞、物業設備運作正常，為品質把關。在成功交付後1個月，我們會提交《集中交付總結報告》，整合客戶的所需和後續服務，協助客戶過渡新居入伙時期。

在本年度內，本集團未曾接獲任何有關本集團的項目因健康與安全理由或品質問題而須延期交付或取消交易的個案。

### Customer Service

The Group attaches great importance to customer's experience and needs with a view to creating high-quality, comfortable and wholesome residential products for our customers. Therefore, the Group has formulated a series of customer service procedures and guidelines in relation to product sales, such as the Guidelines on Project Customer Management of Sanxun Group, the Guidelines on Prediction of Customer Intention of Sanxun Group, the Guidelines on Changes in Sales of Sanxun Group, the Guidelines on Sales Pitches Standardization of Sanxun Group, the Regulations on Background Music in Sales Display Area of Sanxun Group and other relevant internal guidelines, to regulate marketing practices of selling commercial housing, pursuant to which, we adhere to the bottom line of protecting customer's basic rights and interests, thereby requiring customer service and sales staff to serve customers in an honest, pragmatic and positive manner, and eliminating all fraudulent, deceptive or misleading statements in a sales pitch.

The Group attaches great importance to customers' comments and feedbacks on our products and services. We strive to maintain the quality of our products and services and strictly comply with the laws and regulations such as the Law of the People's Republic of China on Protection of Customer Rights and Interests, with a view to gaining the recognition of our customers and maintaining good relationships with them, actively addressing their concerns, identifying shortcomings in our business and seeking improvement solutions. To this end, we invited our customers to fill in the Satisfaction Questionnaire on Delivery of Sanxun Group to collect their comments on "services during the formalities for property delivery", "housing quality", "overall house buying process", "timely response to complaints" and "manner of complaint handling staff", so as to allow the Group to understand the satisfaction and loyalty of our customers, and to identify the shortcomings in the actual operation of frontline business and conduct reviews and improvements to respond to the needs of customers. The Group will continue to improve the quality of our products and service processes and strive to offer customers quality services experience and comfortable residence.

### 客戶服務

本集團高度重視客戶體驗及需求，一直致力為客戶打造高品質、舒適及健康的住宅產品。因此，本集團制定了一系列有關產品銷售的客戶服務流程和指引，例如《三巽集團項目客戶管理指引》、《三巽集團客戶意向判斷指引》、《三巽集團銷售變更指引》、《三巽集團銷售說辭標準化指引》及《三巽集團銷售展示區背景音樂規範指引》等相關內部指引，規範商品房在銷售買賣時的營銷方式，堅持以保障客戶基本權益為底線，讓客服和銷售人員以誠實、務實和積極的態度服務顧客，杜絕在銷售過程中一切欺詐、誘騙或誤導消費者的說辭。

本集團十分重視客戶對於產品和服務的評價及反饋，我們致力維持產品和服務的水平，並嚴格遵守《中華人民共和國消費者權益保護法》等法律法規，希望得到客戶認同並與客戶保持良好關係，積極解決客戶遇到的問題，發掘業務短板並尋求改善方案。為此，我們邀請客戶填寫《三巽集團交付滿意度調查問卷》，收集客戶對「房屋交付手續辦理期間各項服務」、「房屋質量」、「整體購房流程」、「投訴及時回覆」及「投訴處理人員態度」等方面評價，聆聽客戶的聲音，也讓集團了解客戶的滿意度和忠誠度，並找出前線業務的實際運營的不足之處再加以檢討和改善，響應客戶的需求。本集團將持續改進產品質素及服務流程，致力為客戶帶來優質的服務體驗及舒適的家居。



## OPERATIONS MANAGEMENT 營運管理

### Customer Complaint Handling

The Group respects consumers' rights and interests and is committed to providing high quality services to customers. Therefore, we have prepared Guidelines on Project Customer Management of Sanxun Group, the Guidelines on Customer Relationship Management and Maintenance, and the Guidelines on Customer Complaint Handling for the relevant departments to manage and respond to customers' needs with standardized processes, so as to ensure that customer complaints are handled in a timely manner, thereby preventing and reducing the negative impact caused by customer complaints and enhancing service quality and customer satisfaction while maintaining the company's image.

In order to improve the service quality and user experience, the Group introduced the Sanxun Customer Service Management Platform with innovative technology and digital management platform to handle customer consultations, repair requests and complaints through such an intelligent management platform, so that the back-office customer service staff can understand the specific situation and process it immediately, which greatly improves the processing efficiency and cuts the management cost, thus providing convenience to customers and making them feel safe and secure.

In addition, the Group also updated the Customer Complaint Handling Process of Sanxun Properties to regulate the complaint handling process of the Group. Upon receipt of a customer complaint, the responsible department will classify all incoming complaints into four levels according to the severity of the complaint based on the number of complainants, economic loss, lawsuits, media exposure coverage and other criteria. Such complaints will be informed to the customer service department and regional business headquarters and report to the Group for the record in strict compliance with the principle of information submission within 30 minutes. If a complaint is at the level of crisis complaint, the Group will immediately establish a crisis management team to formulate crises proposals and solutions, to which the operation and customer service departments will be responsible for implementation and feedback, and the management of the Group will follow up, supervise and settle the case, ensuring that the case and the project complaint are settled.

### 處理客戶投訴

本集團尊重消費者權益，致力為客戶提供高品質的服務，我們編製了《三巽集團項目客戶管理指引》、《客戶關係管理維護作業指引》及《客戶投訴處理作業指引》，讓相關部門以標準化的流程管理及應對客戶的需求，確保客戶的投訴得以及時處理，從而防範和減少因客戶投訴帶來的負面影響，在維護公司形象的同時提升服務的水平和顧客滿意度。

為了提升服務水平及加強用戶體驗，本集團利用創新科技及數碼化管理平台，推出《三巽客服管理後台》，運用智能化的管理平台處理客戶諮詢、住戶報修及投訴等問題，讓後台客服人員可以在第一時間掌握事件的具體情況並進行處理，大大提高處理效率及節省管理成本，為客戶提供便利的同時也能讓客戶感到安全放心。

此外，本集團也更新了《三巽地產客戶投訴處理流程》，規範整個集團的投訴處理流程。在接獲客戶投訴時，相關責任部門會根據投訴人數、經濟損失、訴訟、媒體覆蓋等判斷標準，把所有接收到的投訴按嚴重性分四級處理，嚴格遵守30分鐘內信息報送的原則，知會客服部及區域事業總部，並上報集團備案。倘若投訴事件屬於危機投訴級別，本集團會馬上成立危機處理小組制定危機預案及解決方案，而運營客服部門會負責方案執行及反饋，集團管理層會作出跟進、督辦及結案的工作，確保個案及項目的投訴得以解決。

During the Year, the Group did not receive any complaints arising from major quality, health and safety issues, while complaints relating to property management, marketing and project management issues were recorded in 60 cases, all of which were duly handled.

### Protection of Intellectual Property Rights

The Group respects intellectual property rights and strictly abides by relevant laws and regulations such as the Intellectual Property Protection Law of the People's Republic of China, the Patent Law of the People's Republic of China and the Trademark Law of the People's Republic of China. The Group has issued guidelines on the computer software that can be installed by employees to ensure that the software installed is genuine so as not to infringe the intellectual property rights of others. At the same time, we also take various measures to ensure that the software installed in the Group's computers has obtained relevant licenses and is legal.

During the Year, the Group did not receive any legal action in relation to the Group's violation of intellectual property rights.

### Customer Privacy Protection

As a real estate developer and seller, the Group's business operations involve the collection of consumers' personal data. For the purpose of protecting the sensitive privacy of customers, the Group has formulated the Guidelines for Project Client Management of Sanxun Group, which covers a series of privacy protection policies, stipulating that internal employees must collect and use customer information in a legal form, and the use of information is limited to the purposes specified in the contract. If the employees and suppliers in the relevant job positions have work involving customer data or company secrets, they are required to sign confidentiality agreements and commitments to ensure that they assume data protection and security responsibilities. In addition, the marketing management center of the Group has also formulated the Guidelines for Contract File Management of Sanxun Group to standardize the access to contract files, and encrypted data containing sensitive customer information, such as customer data files, commercial housing sales contracts, price plans and process approvals. A contract room administrator will also be arranged to be responsible for keeping keys and daily management to strengthen the security of customer information.

During the Year, the Group did not receive any complaints in relation to the leakage of customer privacy by the Group.

在本年度內，本集團未曾接獲任何因重大質量、健康和 safety 問題引起的投訴事件，而有關物業管理、營銷及工程管理等問題的投訴則錄得60宗個案，均已適當處理。

### 保障知識產權

本集團尊重知識產權，並且嚴格遵守《中華人民共和國知識產權保護法》、《中華人民共和國專利法》和《中華人民共和國商標法》等相關法律及法規。本集團就僱員申請可安裝的計算機軟件發出指引，確保其安裝的是正版軟件，以免侵犯他人的知識產權。同時，我們亦採取各種措施，確保本集團的電腦中所安裝的軟件均取得相關的許可認證，並且屬合法。

在本年度內，本集團未曾接獲任何有關本集團違反知識產權的法律訴訟個案。

### 客戶私隱保護

作為房地產開發及銷售商，本集團的業務經營會涉及收集消費者的個人資料，對於保護這些敏感的客戶隱私，本集團制定了《三巽集團項目客戶管理指引》，裡面涵蓋了一系列的隱私保護政策，規範內部員工必須以合法形式收集及使用客戶信息，而對於信息的使用權限僅限於合約中列明的用途。若相關工作崗位的員工及供應商有涉及客戶數據或公司機密的工作內容，他們均需簽訂保密協議和承諾，以確保其承擔數據保護安全責任。此外，本集團的營銷管理中心也制定了《三巽集團合同檔案管理指引》來規範合同檔案的存取，將載有客戶敏感信息的數據，例如客戶資料檔案、商品房買賣合同、價格方案和流程審批等檔案加密，也會安排合同室管理員負責保管鑰匙和日常管理工作，加強客戶信息的安全性。

在本年度內，本集團未曾接獲任何有關本集團洩露客戶隱私的投訴個案。

## BUSINESS ETHICS

The Group attaches great importance to business ethics and clean operation, strictly abides by relevant laws and regulations such as the Company Law of the People's Republic of China, the Anti-Money Laundering Law of the People's Republic of China and the Interim Provisions on Prohibition of Commercial Bribery, and is committed to preventing any form of corruption. The audit and monitoring center of the Group has compiled the Employee Integrity and Self-discipline System and the Internal Reporting System, which clearly set out the disciplinary standards of employees and prohibit all fraudulent and irregular acts, including dereliction of duty, embezzlement, corruption, bribery, theft, abuse of power for personal gain, insider trading, retaliation and other violations of laws, disciplines and regulations that harm the interests of the Group. The Group also regularly provides anti-corruption training for employees to clearly express the Group's expectations for them. New employees will also be invited to participate in corruption prevention seminars, the contents of which are based on industry conditions and cases, aiming to provide employees with warning education.

In addition, the Group has also established a clear internal complaint and reporting mechanism. If employees encounter unfair treatment or want to expose others' behaviors that violate professional ethics, they can submit reporting information in real names according to the reporting methods listed in the Internal Reporting System, including oral, written (letter), telephone, email, WeChat or direct access to the acceptance department. The audit and monitoring center of the Group will keep the reported information confidential, and will analyze the reported content and evidence as soon as possible. If the incident involves major fraud, the audit and monitoring center will conduct an in-depth investigation together with the Group's human resources department and legal department to jointly decide whether it is necessary to refer the case to the local law enforcement department for follow-up, and will report it to the Group's top management. In the process of handling the reporting work, the Group will keep confidential the information of the whistleblowers and the content of the reports to ensure the safety of the whistleblowers.

## 商業道德

本集團高度重視商業道德及廉潔經營，嚴格遵守《中華人民共和國公司法》、《中華人民共和國反洗錢法》、和《關於禁止商業賄賂行為的暫行規定》等法律法規，並致力防止任何形式的貪腐行為。本集團的審計監測中心編訂了《員工廉潔自律制度》及《內部舉報制度》，清楚列明員工的紀律行為標準，禁止一切舞弊違規行為，包括瀆職、侵佔、貪污、受賄、盜竊、以權謀私、內幕交易、打擊報復以及其他損害本集團利益的違法、違紀、違規的行為等，並會根據所訂立的制度和則規來處理職工違規行為。本集團亦會定期為員工提供反貪腐培訓，清晰表達本集團對員工的期望，也會讓新入職的員工參加防貪專題講座，內容針對行業的情況及案例，為員工提供警示教育。

此外，本集團也訂立了清晰的內部投訴及舉報機制，若員工遭遇不公平待遇或要揭發他人違反職業道德的行為，可以根據《內部舉報制度》所列明的舉報方式，包括口頭、書面（信函）、電話、電子郵件、微信或直接訪問受理部門等實名提交舉報信息。本集團的審計監測中心會保密所收到舉報信息，並會在第一時間對舉報內容及證據進行分析。若事件涉及重大舞弊行為，審計監測中心將會連同集團人力資源部門及法務部門進行深入調查，共同決定是否需要轉介當地執法部門立案跟進，並會上報集團最高管理層。在處理舉報工作的過程中，本集團將嚴格保密舉報人信息及舉報內容，切實保障舉報人的安全。

Report hotline: 舉報熱線：	021-33280685/0551-65509205 021-33280685/0551-65509206
Report email: 舉報郵箱：	jubao@sanxungroup.com
Report letter delivery address: 舉報信函投遞地址：	Head of Audit and Supervision Department, Sanxun Group, 3#, Hongqiao Jiahui, Shenhong Road, Shanghai 上海市申虹路虹橋嘉匯3# 三巽集團審計監察負責人
On-site report acceptance department: 現場舉報受理部門：	Audit and Supervision Department, Sanxun Group, 3#, Hongqiao Jiahui, Shenhong Road, Shanghai 上海市申虹路虹橋嘉匯3# 三巽集團審計監察部門

During the Year, the Group did not receive any cases of irregularities or corruption lawsuits against the Group and its employees.

在本年度內，本集團未曾接獲任何有關本集團及其員工的違規或貪污訴訟案件。

## COMMUNITY INVESTMENT

### 社區投資

The Group upholds the spirit of “what is taken from the society will be used on the society”. Aside from pursuing business development, the Group proactively assumes its corporate social responsibilities, cares for the underprivileged, and encourages all staff to participate in various charitable activities, so as to make contributions to the community.

The Group focuses on four aspects, namely, “disaster relief”, “poverty alleviation”, “education” and “promotion of Chinese culture”. It helps to the development of the public welfare through donating money, goods, services and direct assistance. Nearly RMB1.3 million was invested in poverty alleviation and public welfare by the Group during the Year. The Group has participated in the following numerous charitable activities by means of donating or sponsoring in various provinces and regions:

本集團秉持著「取之社會，用之社會」的精神，在追求業務發展的同時也積極履行企業社會責任及關懷弱勢社群，鼓勵上下員工一同身體力行參與不同的慈善活動，為社群作出貢獻。

本集團聚焦於「救災」、「扶貧」、「教育」及「弘揚中華文化」四大領域，通過捐助金錢、商品、服務和直接援助等方式助力公益事業發展，而本年度，本集團於脫貧攻堅以及公益事業上投入近人民幣130萬元。本年度，本集團在中國多個省份及地區以捐贈或贊助方式參與以下一系列的慈善活動：



Activity of caring for the elderly was carried out at Dujia Village Community in Ningyang County on the Double Ninth Festival and flour was donated to them.

在寧陽縣杜家村小區開展重陽節敬老愛老活動，向寧陽縣杜家村小區老人捐贈麵粉。



We participated in the charitable plan of “Yingshanhong (映山紅)” initiated by the television program of “First Time” in Anhui. We donated music equipment and sports equipment valued at RMB50,000, with an aim to help five rural primary schools in Anhui province to establish music classrooms, therefore promoting the equalization of rural education and rural revitalization.

參與安徽廣電第一時間「映山紅」公益計劃，捐贈價值5萬元音樂器材、體育器材，幫助安徽省內5所農村小學建設音樂教室，促進農村教育均等化和鄉村振興。



We participated in “Caring for Left-behind Children” in Lixin County on the Spring Festival. We donated school bags, stationery, sports goods and other love gifts to left-behind children, as well as cooking oil, flour and other necessities to families with left-behind children in rural areas.

參與利辛縣「關愛留守兒童」新春送溫暖活動，為利辛縣留守兒童捐贈書包、文具、體育用品等愛心禮包，為鄉村留守家庭捐贈食用油、麵粉等生活物資。

# APPENDIX I: SUMMARY OF KEY PERFORMANCE INDICATORS

## 附錄一：關鍵績效指標匯總

### SUMMARY OF ENVIRONMENTAL KEY PERFORMANCE INDICATORS

### 環境關鍵績效指標匯總

Key Performance Indicators	關鍵績效指標	2021年
<b>Waste gas emissions<sup>1</sup></b>	<b>廢氣排放物<sup>1</sup></b>	
Nitrogen Oxides (kg)	氮氧化物(千克)	6.41
Sulphur Oxides (kg)	二氧化硫(千克)	0.12
Suspended particles (kg)	顆粒物(千克)	0.47
<b>GHG</b>	<b>溫室氣體</b>	
Total GHG emissions (tonnes of carbon dioxide equivalent) <sup>2</sup>	溫室氣體排放總量 (噸二氧化碳當量) <sup>2</sup>	1,406
Scope 1 – Total direct GHG emissions (tonnes of carbon dioxide equivalent) <sup>3</sup>	範圍1 – 直接溫室氣體排放總量 (噸二氧化碳當量) <sup>3</sup>	20
Scope 2 – Total energy indirect GHG emissions (tonnes of carbon dioxide equivalent) <sup>4</sup>	範圍2 – 能源間接溫室氣體排放總量 (噸二氧化碳當量) <sup>4</sup>	1,344
Scope 3 – Total other indirect GHG emissions (tonnes of carbon dioxide equivalent) <sup>5</sup>	範圍3 – 其他間接溫室氣體排放總量 (噸二氧化碳當量) <sup>5</sup>	42
Intensity of GHG emissions (tonnes of carbon dioxide equivalent/employee) <sup>6</sup>	溫室氣體排放密度 (噸二氧化碳當量/僱員) <sup>6</sup>	4.73
<b>Waste</b>	<b>廢棄物</b>	
<i>Non-hazardous waste</i>	<i>無害廢棄物</i>	
Total non-hazardous waste generated (tonnes) <sup>7</sup>	所產生無害廢棄物總量(噸) <sup>7</sup>	39
Intensity of non-hazardous waste (tonnes/employee) <sup>6</sup>	無害廢棄物密度(噸/僱員) <sup>6</sup>	0.13
<i>Hazardous waste</i>	<i>有害廢棄物</i>	
Total hazardous waste generated (kg) <sup>8</sup>	所產生有害廢棄物總量(千克) <sup>8</sup>	127
Intensity of hazardous waste (kg/employee) <sup>6</sup>	有害廢棄物密度(千克/僱員) <sup>6</sup>	0.43
<b>Use of resources</b>	<b>資源使用</b>	
<i>Energy</i>	<i>能源</i>	
Total energy consumption (Million MWh)	能源消耗總量(百萬兆瓦時)	1,935
Vehicle fuel consumption (MWh) <sup>9</sup>	車輛燃料耗用(兆瓦時) <sup>9</sup>	80
Purchased electricity (MWh)	外購電力(兆瓦時)	1,855
Energy consumption intensity (MWh/employee) <sup>6</sup>	能源消耗密度(兆瓦時/僱員) <sup>6</sup>	6.51
<i>Water consumption</i>	<i>用水</i>	
Total water consumption (m <sup>3</sup> )	用水總量(立方米)	80,995
Intensity of water consumption (m <sup>3</sup> /employee) <sup>6</sup>	用水密度(立方米/僱員) <sup>6</sup>	272.71

## APPENDIX I: SUMMARY OF KEY PERFORMANCE INDICATORS

### 附錄一：關鍵績效指標匯總

*Notes:*

1. The calculation of air pollutants takes reference from emission factors in the Reporting Guidance on Environmental KPIs issued by the Stock Exchange.
2. The Group's GHG includes carbon dioxide, methane and nitrous oxide. The GHG emissions data is presented in carbon dioxide equivalent ("CO<sub>2</sub>e").
3. The data includes GHG emissions from the combustion of fuels in vehicles, and is calculated based on the emission factors in the Land Transportation Enterprises – Guidelines for Accounting and Reporting of Greenhouse Gas Emissions (Trial) issued by the NDRC of the PRC and Guidance on Reporting of Environmental Key Performance Indicators issued by the Stock Exchange.
4. The data includes GHG emissions generated by purchased electricity and is calculated based on the emission factors provided by the NDRC of the PRC.
5. The data includes GHG emissions from the electricity used for water and sewage treatment, business trips by employees and disposal of waste paper to landfills, and is calculated based on the International Civil Aviation Organization Carbon Emissions Calculator and emission factors in the Reporting Guidance on Environmental Key Performance Indicators issued by the Stock Exchange.
6. Intensity is calculated based on the total employees in the offices, rather than the total employees of the Group.
7. Non-hazardous waste data is calculated based on the actual weight and the Non-Residential Domestic Waste and Kitchen Waste Volumetric Charging Standard Inquiry issued by Beijing Municipal Commission of Urban Management.
8. Hazardous waste data is calculated based on the actual weight.
9. The data is calculated based on the Land Transportation Enterprises – Guidelines for Accounting and Reporting of Greenhouse Gas Emissions (Trial) issued by the NDRC of the PRC and Guidance on Reporting of Environmental Key Performance Indicators issued by the Stock Exchange.

*附註：*

1. 空氣污染物乃經參考聯交所發佈的《環境關鍵績效指標報告指引》的排放因子後計算得出。
2. 本集團的溫室氣體包括二氧化碳、甲烷及氧化亞氮。溫室氣體排放數據以二氧化碳當量(「**二氧化碳當量**」)表示。
3. 數據包括車輛燃料所產生的溫室氣體排放，並根據中國國家發改委發佈的《陸上交通運輸企業 – 溫室氣體排放核算方法與報告指南(試行)》及聯交所發佈的《環境關鍵績效指標匯報指引》中的排放因子計算。
4. 數據包括使用外購電力所產生的的溫室氣體排放，並根據中國國家發改委提供的排放因子計算。
5. 數據包括用於水和污水處理的電力，員工的商務差旅以及將廢紙運往垃圾填埋場的溫室氣體排放量，並根據國際民航組織碳排放計算器及聯交所發佈的《環境關鍵績效指標報告指引》中的排放因子計算。
6. 密度乃根據辦公室之總人數計算，而非集團總人數。
7. 無害廢棄物數據是根據實際重量及北京市城市管理委員會發佈的《非居民生活垃圾和餐廚垃圾容積計量收費標準查詢》計算所得。
8. 有害廢棄物數據是根據實際重量計算所得。
9. 數據根據中國國家發改委發佈的《陸上交通運輸企業 – 溫室氣體排放核算方法與報告指南(試行)》及聯交所發佈的《環境關鍵績效指標匯報指引》計算所得。



## APPENDIX I: SUMMARY OF KEY PERFORMANCE INDICATORS

### 附錄一：關鍵績效指標匯總

#### SUMMARY OF SOCIAL KEY PERFORMANCE INDICATORS 社會關鍵績效指標匯總

Key Performance Indicators	關鍵績效指標	2021年
<b>Total number of employees</b>	<b>員工總人數</b>	<b>779</b>
By gender	按性別	
Male	男	390
Female	女	389
By age	按年齡	
Under 30 years old	<30歲	314
30-50 years old	30-50歲	454
Over 50 years old	>50歲	11
By geographical region	按地區	
China	中國	779
By employment type	按僱傭類型	
Full time	全職	779
Part time	兼職	0
<b>Employee turnover rate (%)</b>	<b>員工流失比率(%)</b>	<b>31</b>
By gender	按性別	
Male	男	40
Female	女	22
By age	按年齡	
Under 30 years old	<30歲	24
30-50 years old	30-50歲	36
Over 50 years old	>50歲	36
By geographical region	按地區	
China	中國	31
<b>Average training hours of employee (hour) and percentage of employee trained (%)</b>	<b>僱員平均受訓時數(小時)及受訓僱員百分比(%)</b>	
By gender	按性別	
Male	男	4(56)
Female	女	5(72)
By employee category	按僱員級別	
Senior	高級	20(100)
Middle	中級	8(100)
Junior	初級	4(55)

APPENDIX I: SUMMARY OF KEY PERFORMANCE INDICATORS  
附錄一：關鍵績效指標匯總

Key Performance Indicators	關鍵績效指標	2021年	2020年	2019年
<b>Health and safety</b>	<b>健康與安全</b>			
No. of work-related fatalities	因工亡故人數	0	0	0
Rate of work-related fatalities (%)	因工亡故比率(%)	0	0	0
No. of lost days due to work injury	因工傷損失工作日數	0	0	0

Key Performance Indicators	關鍵績效指標	2021年
<b>Main suppliers</b>	<b>主要供應商</b>	
East China	華東	46
North China	華北	1
Southwest China	西南	1

## APPENDIX II: INDEX TO THE STOCK EXCHANGE'S ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORTING GUIDELINES

### 附錄二：聯交所《環境、社會及管治報告指引》對照索引

ESG aspects ESG層面	Key Performance Indicators (“KPI”) 關鍵績效指標(「KPI」)		Report section/statement 報告章節／聲明
<b>A. Environmental</b> A. 環境			
<b>A1: Emissions</b> A1：排放物	KPI A1.1	The types of emissions and respective emissions data. 排放物種類及相關排放資料。	Summary of Environmental Key Performance Indicators 環境關鍵績效指標匯總
	KPI A1.2	GHG emissions in total and intensity. 溫室氣體總排放量及密度。	Summary of Environmental Key Performance Indicators 環境關鍵績效指標匯總
	KPI A1.3	Total hazardous waste produced and intensity. 所產生有害廢棄物總量及密度。	Summary of Environmental Key Performance Indicators 環境關鍵績效指標匯總
	KPI A1.4	Total non-hazardous waste produced and intensity. 所產生無害廢棄物總量及密度。	Summary of Environmental Key Performance Indicators 環境關鍵績效指標匯總
	KPI A1.5	Description of emission target(s) set and steps taken to achieve them. 描述所訂立的排放量目標及為達到這些目標所採取的步驟。	Emissions Management 排放管理
	KPI A1.6	Description of how hazardous and non-hazardous wastes are handled, and a description of reduction target(s) set and steps taken to achieve them. 描述處理有害及無害廢棄物的方法，及描述所訂立的減廢目標及為達到這些目標所採取的步驟。	Emissions Management 排放管理

APPENDIX II: INDEX TO THE STOCK EXCHANGE'S ENVIRONMENTAL,  
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附錄二：聯交所《環境、社會及管治報告指引》對照索引

ESG aspects ESG層面	Key Performance Indicators (“KPI”) 關鍵績效指標(「KPI」)		Report section/statement 報告章節／聲明
<b>A2: Use of resources</b> <b>A2：資源使用</b>	KPI A2.1	Direct and/or indirect energy consumption by type in total and intensity. 按類型劃分的直接及／或間接能源總耗量及密度。	Summary of Environmental Key Performance Indicators 環境關鍵績效指標匯總
	KPI A2.2	Water consumption in total and intensity. 總耗水量及密度。	Summary of Environmental Key Performance Indicators 環境關鍵績效指標匯總
	KPI A2.3	Description of energy use efficiency target(s) set and steps taken to achieve them. 描述所訂立的能源使用效益目標及為達到這些目標所採取的步驟。	Use of Resources 資源使用
	KPI A2.4	Description of whether there is any issue in sourcing water that is fit for purpose, water efficiency target(s) set and steps taken to achieve them. 描述求取適用水源上可有任何問題，以及所訂立的用水效益目標及為達到這些目標所採取的步驟。	Use of Resources 資源使用
	KPI A2.5	Total packaging material used for finished products and with reference to per unit produced. 製成品所用包裝材料的總量及每生產單位佔量。	Not applicable (The Group's business does not involve the use of any packaging materials.) 不適用(本集團業務不牽涉任何包裝物料的使用。)
<b>A3: The environment and natural resources</b> <b>A3：環境及天然資源</b>	KPI A3.1	Description of the significant impacts of activities on the environment and natural resources and the actions taken to manage them. 描述業務活動對環境及天然資源的重大影響及已採取管理有關影響的行動。	Use of Resources 資源使用
<b>A4: Climate change</b> <b>A4：氣候變化</b>	KPI A4.1	Description of the significant climate related issues which have impacted, and those which may impact, the issuer, and the actions taken to manage them. 描述已經及可能會對發行人產生影響的重大氣候相關事宜，及應對行動。	Responding to Climate Change 應對氣候變化

APPENDIX II: INDEX TO THE STOCK EXCHANGE'S ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORTING GUIDELINES

附錄二：聯交所《環境、社會及管治報告指引》對照索引

ESG aspects ESG層面	Key Performance Indicators (“KPI”) 關鍵績效指標(「KPI」)		Report section/statement 報告章節／聲明
B. Social B. 社會			
Employment and labor practice 僱傭及勞工常規			
<b>B1: Employment</b> <b>B1：僱傭</b>	KPI B1.1	Total workforce by gender, employment type, age group and geographical region. 按性別、僱傭類型、年齡組別及地區劃分的僱員總數。	Summary of Social Key Performance Indicators 社會關鍵績效指標匯總
	KPI B1.2	Employee turnover rate by gender, age group and geographical region. 按性別、年齡組別及地區劃分的僱員流失比率。	Summary of Social Key Performance Indicators 社會關鍵績效指標匯總
<b>B2: Health and safety</b> <b>B2：健康與安全</b>	KPI B2.1	Number and rate of work-related fatalities. 因工作關係而死亡的人數及比率。	Summary of Social Key Performance Indicators 社會關鍵績效指標匯總
	KPI B2.2	Lost days due to work injury. 因工傷損失工作日數。	Summary of Social Key Performance Indicators 社會關鍵績效指標匯總
	KPI B 2.3	Description of occupational health and safety measures adopted how they are implemented and monitored. 描述所採納的職業健康與安全措施，以及相關執行及監察方法。	Health and Safety 健康與安全
<b>B3: Development and training</b> <b>B3：發展及培訓</b>	KPI B3.1	The percentage of employees trained by gender and employee category. 按性別及僱員類別劃分的受訓僱員百分比。	Summary of Social Key Performance Indicators 社會關鍵績效指標匯總
	KPI B3.2	The average training hours completed per employee by gender and employee category. 按性別及僱員類別劃分，每名僱員完成受訓的平均時數。	Summary of Social Key Performance Indicators 社會關鍵績效指標匯總
<b>B4: Labor standards</b> <b>B4：勞工準則</b>	KPI B4.1	Description of measures to review employment practices to avoid child and forced labor. 描述檢討招聘慣例的措施以避免童工及強制勞工。	Employment Compliance and Labor Standards 僱傭合規及勞工準則
	KPI B4.2	Description of steps taken to eliminate such practices when discovered. 描述在發現違規情況時消除有關情況所採取的步驟。	Employment Compliance and Labor Standards 僱傭合規及勞工準則

APPENDIX II: INDEX TO THE STOCK EXCHANGE'S ENVIRONMENTAL,  
SOCIAL AND GOVERNANCE REPORTING GUIDELINES  
附錄二：聯交所《環境、社會及管治報告指引》對照索引

ESG aspects ESG層面	Key Performance Indicators (“KPI”) 關鍵績效指標(「KPI」)		Report section/statement 報告章節／聲明
<b>Operating practice</b> 營運慣例			
<b>B5: Supply chain management</b> B5：供應鏈管理	KPI B5.1	Number of suppliers by geographical region. 按地區劃分的供應商數目。	Summary of Social Key Performance Indicators 社會關鍵績效指標匯總
	KPI B5.2	Description of practices relating to engaging supplies, number of supplies where the practices are being implemented, how they are implemented and monitored. 描述有關聘用供應商的慣例，向其執行有關慣例的供應商數目、以及有關慣例的執行及監察方法。	Supply Chain Management 供應鏈管理
	KPI B5.3	Description of practices used to identify environmental and social risks along the supply chain, and how they are implemented and monitored. 描述有關識別供應鏈每個環節的環境及社會風險的慣例，以及相關執行及監察方法。	Supply Chain Management 供應鏈管理
	KPI B5.4	Description of practices used to promote environmentally preferable products and services when selecting suppliers, and how they are implemented and monitored. 描述在揀選供應商時促使多用環保產品及服務的慣例，以及相關執行及監察方法。	Supply Chain Management 供應鏈管理
<b>B6: Product responsibility</b> B6：產品責任	KPI B6.1	Percentage of total products sold or shipped subject to recalls for safety and health reasons. 已售或已運送產品總數中因安全與健康理由而須回收的百分比。	Product Responsibility 產品責任
	KPI B6.2	Number of products and service related complaints received and how they are dealt with. 接獲關於產品及服務的投訴數目以及應對方法。	Product Responsibility 產品責任
	KPI B6.3	Description of practices relating to observing and protecting intellectual property rights. 描述與維護及保障知識產權有關的慣例。	Product Responsibility 產品責任
	KPI B6.4	Description of quality assurance process and recall procedures. 描述質量檢定過程及產品回收程序。	Product Responsibility 產品責任
	KPI B6.5	Description of consumer data protection and privacy policies, how they are implemented and monitored. 描述消費者數據保障及私隱政策，以及相關執行及監察方法。	Product Responsibility 產品責任

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ESG aspects ESG層面	Key Performance Indicators (“KPI”) 關鍵績效指標(「KPI」)		Report section/statement 報告章節／聲明
<b>B7: Anti-corruption</b> <b>B7：反貪污</b>	KPI B7.1	Number of concluded legal cases regarding corrupt practices brought against the issuer or its employees during the reporting period and the outcomes of the cases. 於匯報期內對發行人或其僱員提出並已審結的貪污訴訟案件的數目及訴訟結果。	Business Ethics 商業道德
	KPI B7.2	Description of preventive measures and whistleblowing procedures, how they are implemented and monitored. 描述防範措施及舉報程序，以及相關執行及監察方法。	Business Ethics 商業道德
	KPI B7.3	Description of anti-corruption training provided to directors and staff. 描述向董事及員工提供的反貪污培訓。	Business Ethics 商業道德
<b>Community</b> 社區			
<b>B8: Community investment</b> <b>B8：社區投資</b>	KPI B8.1	Focus areas of contribution. 專注貢獻範疇。	Community Investment 社區投資
	KPI B8.2	Resources contributed of the focus area. 在專注範疇所動用資源。	Community Investment 社區投資



**Sanxun Holdings Group Limited**  
**三巽控股集團有限公司**