

# CULTURECOM



文化傳信集團有限公司

(於百慕達註冊成立之有限公司)

(股份代號：00343)

CULTURECOM HOLDINGS LIMITED

(Incorporated in Bermuda with limited liability)

(Stock Code : 00343)



## 2023

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

## ABOUT THIS REPORT

### 關於本報告

SCOPE AND REPORTING PERIOD 範疇及報告期間	4
---------------------------------------	---

REPORTING PRINCIPLES 報告原則	6
------------------------------	---

MISSION AND VISION ON ENVIRONMENTAL, SOCIAL AND GOVERNANCE (“ESG”) 環境、社會及管治（「環境、社會及管治」）的使命及展望	8
--	---

THE BOARD STATEMENT 董事會聲明	9
------------------------------	---

STAKEHOLDERS’ ENGAGEMENT AND MATERIALITY 持份者參與及重要性	13
---	----

STAKEHOLDERS’ FEEDBACK 持份者反饋	17
---------------------------------	----

## A. Environmental 環境

A1. Emissions 排放	18
---------------------	----

A1.1 Air Emissions 廢氣排放	19
----------------------------	----

A1.2 Greenhouse Gas (“GHG”) Emissions 溫室氣體（「溫室氣體」）排放	20
---	----

A1.3 Hazardous Waste 有害廢棄物	23
-------------------------------	----

A1.4 Non-hazardous Waste 無害廢棄物	24
-----------------------------------	----

A1.5 Emissions Mitigation Measures and Targets 減排措施及目標	25
---	----

A1.6 Wastes Reduction Initiatives and Targets 減廢措施及目標	27
--	----



A2. Use of Resources 資源使用	31
A2.1 Energy Consumption 能源耗量	31
A2.2 Water Consumption 耗水量	33
A2.3 Energy Use Efficiency Initiatives and Target 節約能源措施及目標	34
A2.4 Water Use Efficiency Initiatives and Target 節約用水措施及目標	36
A2.5 Packaging Materials 包裝材料	36
A3. The Environment and Natural Resources 環境及天然資源	
A3.1 Significant Impacts of Activities on the Environment 業務活動對環境的重大影響	37
A4. Climate Change 氣候變化	37
B. Social 社會	
1. Employment and Labour Practices 僱傭及勞工常規	
B1. Employment 僱傭	45
B2. Employee Health and Safety 僱員的健康與安全	54
B3. Development and Training 發展及培訓	57
B4. Labour Standards 勞工準則	61



2. Operating Practices 營運常規	
B5. Supply Chain Management 供應鏈管理	63
B6. Product Responsibility 產品責任	67
B7. Anti-corruption 反貪污	73
B8. Community Investment 社區投資	75





# ABOUT THIS REPORT

## 關於本報告

### SCOPE AND REPORTING PERIOD

Culturecom Holdings Limited (hereinafter referred to as the “**Company**”, and together with its subsidiaries referred to as the “**Group**”) is pleased to publish the Environmental, Social, and Governance (the “**ESG**”) report, highlighting its ESG performance, with disclosure reference made to the ESG Reporting Guide as described in Appendix 27 to the Rules Governing the Listing of Securities on the Stock Exchange of Hong Kong Limited (the “**Listing Rules**”) Guidance set out by The Stock Exchange of Hong Kong Limited (the “**HKEX**”). This year, the Group has taken its first step to disclosing its climate-related information aligning with the TCFD recommendations on climate-related financial disclosure (the “**TCFD Framework**”).

### 範疇及報告期間

文化傳信集團有限公司(以下簡稱「本公司」, 連同其附屬公司統稱「本集團」)欣然刊發此份環境、社會及管治(「環境、社會及管治」)報告, 主要匯報本集團於環境、社會及管治方面的表現, 並參考香港聯合交易所有限公司(「聯交所」)所訂香港聯合交易所有限公司證券上市規則(「上市規則」)附錄二十七所載《環境、社會及管治報告指引》作出披露。本年度, 本集團已採取第一步披露其氣候相關資料, 以符合氣候相關財務披露工作小組(TCFD)有關氣候相關財務披露的建議(「**TCFD**框架」)。

The Group is principally engaged in traditional publishing, Intellectual Properties (“IPs”) licensing, digital marketing, retailing and wholesales and natural language processing business. This ESG report covers the Group’s overall performance in two subject areas, namely, Environmental and Social of key business operations in Hong Kong and the People’s Republic of China (the “PRC”), from 1 April 2022 to 31 March 2023 (the “Reporting Period”), unless otherwise stated. During the Reporting Period, the Group has formed a strategic alliance with iFlytek Co., Ltd. (“iFlytek”) which is a well-known listed company in intelligent speech and AI technologies in the Asia-Pacific region (Shenzhen Stock Exchange Stock Code: 002230), and Imitation Brain Technology (Shenzhen) Co., Ltd. (“Imitation Brain”) to develop and produce kinds of offline Chinese language voice recognition chips that have broad applications for various electronic devices or application environments. The reporting scope for Reporting Period therefore expanded to include an additional Zhuhai office in the PRC. The business operations to be reported include:

- the office in Admiralty, Hong Kong (hereafter the “Admiralty office”);
- the office in Tsuen Wan, Hong Kong (hereafter the “Tsuen Wan office”);
- the warehouse in Tsuen Wan, Hong Kong (hereafter the “Tsuen Wan warehouse”);
- the office in Guangzhou, the PRC (hereafter the “Guangzhou office”);
- the office in Beijing, the PRC (hereafter the “Beijing office”); and
- the office in Zhuhai, the PRC (hereafter the “Zhuhai office”).
- 於香港金鐘的辦公室（以下稱「金鐘辦公室」）；
- 於香港荃灣的辦公室（以下稱「荃灣辦公室」）；
- 於香港荃灣的倉庫（以下稱「荃灣倉庫」）；
- 於中國廣州的辦公室（以下稱「廣州辦公室」）；
- 於中國北京的辦公室（以下稱「北京辦公室」）；及
- 於中國珠海的辦公室（以下稱「珠海辦公室」）。

# ABOUT THIS REPORT

## 關於本報告

The board of directors of the Company (the “Board”) acknowledged that it has overall responsibility for the Group’s ESG strategy and reporting and for evaluating and determining the Group’s ESG-related risks. The Group has complied with all the mandatory disclosure requirements and the “comply or explain” provisions set out in the ESG Reporting Guide during the Reporting Period. This ESG report has been reviewed and approved by the Board.

### REPORTING PRINCIPLES

The contents covered in this report comply with the four reporting principles of materiality, quantitiveness, balance, and consistency required in Appendix 27 to the Listing Rules and Guidance set out by The Stock Exchange of Hong Kong Limited.

**Materiality** – Materiality assessments have been carried out to identify material environmental and social issues that have major impacts on investors and other stakeholders, the significant stakeholders, procedures, and results of the engagement of which are presented in the section “Stakeholder Engagement and Materiality” in the Report.

**Quantitiveness** – Key performance indicators (“KPI”s) have been established, and are measurable and applicable to make valid comparisons under appropriate conditions; information on the standards, methodologies, assumptions, and/or calculation tools used, and sources of conversion factors used, have been disclosed when applicable.

本公司董事會（「董事會」）深明其對本集團的環境、社會及管治策略及報告的責任，以及評估及釐定本集團的環境、社會及管治相關風險。本集團於報告期間一直遵守環境、社會及管治報告指引所載的所有強制披露規定及「不遵守就解釋」條文。本環境、社會及管治報告董事會已經審閱及批准。

### 報告原則

本報告所涵蓋的內容符合上市規則附錄二十七及香港聯合交易所指引所規定的四項報告原則—重要性、量化、平衡及一致性。

**重要性**—已作出重要性評估，以識別出對投資者及其他持份者構成重大影響的重大環境及社會議題、重要持份者、程序及參與結果，均載於本報告「持份者參與及重要性」一節。

**量化**—已制定關鍵績效指標（「關鍵績效指標」），關鍵績效指標為可計量且適用於在適當條件下進行有效比較；所用的標準、方法、假設及／或計算工具的資料，以及所使用的轉換因素的來源已在適用時予以披露。



## ABOUT THIS REPORT 關於本報告

**Balance** – The Report presents the Group’s performance during the Reporting Period in an impartial manner, avoiding choices, omissions, or presentation formats that may unduly influence readers’ decisions or judgments.

**Consistency** – Consistent statistical methodologies and presentation of KPIs have been used to allow meaningful comparisons of related data over time.

**平衡**—本報告以不偏不倚的方式呈報本集團於報告期間的表現，以避免可能會不恰當地影響讀者決策或判斷的選擇、遺漏或呈報方式。

**一致性**—已使用一致的披露統計方法及關鍵績效指標的呈報方式，以令有關數據日後可作有意義的比較。



# MISSION AND VISION ON ESG

## 環境、社會及管治的使命及展望

The Group was one of the original founding members of the Hong Kong Comics and Animation Federation Limited, founded in 1999. The future business development of the Group will closely align with the overall vision on Environment, Social, and Governance. The Group continues to build and strengthen its marketing and technical teams to serve its customers and widen the scope of services. Compared with traditional publishing, information digitalization will bring in environmental benefits including saving forest resources, increasing supply chain efficiency, and reducing manufacturing resource consumption.

In addition, the Group believes that by expanding the IPs business in Mainland China, the Group can apply its own expertise and knowledge in contributing to a stronger and more standardized IPs market and in preventing potential infringements in Mainland China.

Looking forward to 2023 and beyond, the Group believes the digital marketing business together with AI technologies will bring environmental and social benefits that strike a balance between protecting the environment and creating social values while achieving commercial returns and maintaining profitability. The Group is committed to ensuring business continuity, while sparing no effort in integrating environmental, social and management principles into the business administrative practices. This has produced a positive impact on the environment and the entire community. When these objectives are properly achieved, negative environmental and social impacts can be minimised during operations, while striving to create long-term shared value for all the stakeholders.

本集團為創辦於一九九九年的香港動漫畫聯合有限公司的原創辦成員之一。本集團的未來業務發展將與環境、社會及管治的整體展望密切一致。本集團繼續建立及加強其市場推廣及技術團隊，為客戶提供服務，並擴大服務範圍。與傳統出版比較，資料數碼化將為環境帶來許多益處，包括節省樹木資源、提升供應鏈效率及減少製造資源消耗。

此外，本集團相信，透過擴充中國內地的知識產權業務，本集團可運用專業及知識讓中國內地成為一個更強大、更標準化的知識產權市場，並防止遭到侵權。

展望二零二三年及未來，本集團相信，數碼化市場推廣業務連同人工智能將帶來環境及社會效益，從而在保護環境及創造社會價值與實現商業回報及維持盈利能力之間取得平衡。本集團致力確保業務持續運作，並不遺餘力地將環境、社會及管治原則融入我們的業務管理常規，為環境及整個社區帶來正面影響。當該等目標妥為實現時，在營運過程中可盡量減少對環境及社會的負面影響，同時致力為所有持份者創造長期共享價值。

The prolonged Covid-19 pandemic had caused adverse effect on business and slowed down or delayed new business development. The digital marketing business has faced unusual challenges and has been scaling down substantially its operation.

Despite the outbreak of COVID-19 pandemic causing the Group to experience a reduction of its business activities of intellectual properties related business and digital marketing, the Board strives hard to maximise value for the shareholders by pursuing all potential viable investment and business opportunities and expanding its business segments in order to broaden the revenue and profit base of the Group. In light of (i) the anticipated recovery in economy in the second half of 2023; and (ii) increasing prevalence of technology in service sector, the Group, with its aspirations on artificial intelligent technology and previous research and development, intends to further invest on the development and production of software and chipset with natural language processing technology, with a focus on Chinese language voice recognition, which is anticipated to have broad applications. The Group is optimistic about the general economic recovery and will continue to strive to maintain and focus on improving operational efficiency while moving steadily and cautiously in fostering new business development.

2019冠狀病毒病疫症持續不斷，對業務造成不利影響，並導致新業務發展放緩或延誤。數碼化市場推廣業務面臨不尋常挑戰，集團因此大幅縮減其營運規模。

儘管2019冠狀病毒病疫症的爆發導致本集團在知識產權相關業務及數碼化市場推廣方面的業務活動減少，董事會仍致力通過尋求所有潛在可行的投資及商機以及擴大其業務分部，為股東創造最大價值，以擴大本集團的收入及基礎溢利。鑒於(i)預期二零二三年下半年經濟復甦；及(ii)技術在服務領域日益普及，本集團基於其對人工智能技術的期望及過往對人工智能技術的研發，其擬進一步投資於開發及生產專注於中文語音識別的自然語言處理技術軟件及芯片，並預期該技術將得到廣泛的應用。本集團對整體經濟復甦感到樂觀，並將繼續致力維持及著力改善營運效率，並同時以審慎態度穩步推動新業務發展。

# THE BOARD STATEMENT

## 董事會聲明

Sustainability and ESG topics are important aspects of the Group's corporate social responsibility, as recognised by the Board. The Board is ultimately responsible for overseeing the Group's ESG matters, which include its management approach, strategy, and policies. The Group pledges to embed ESG considerations into its decision-making process. To achieve this, the Group ensures the alignment of the ESG governance with its strategic growth, while advocating ESG integration into its business operations. There were policies established at both the Group-level and operation-specific level to ensure that ESG practices remained consistent and aligned across the Group.

Despite the absence of an ESG Committee in the Group, the management of the Group annually informs the Board about the results of the annual materiality assessment, relevant matters that have a significant impact on the Group's operations, ESG performance, and the significant risks associated with the Group's impact on health, safety, environment, and society. ESG-related training sessions are arranged for the directors to ensure the Board's expertise for effective oversight on ESG matters.

就本集團企業社會責任而言，董事會認為可持續發展及環境、社會及管治議題至關重要。董事會最終負責監督本集團的環境、社會及管治事宜，包括其管理方法、策略及政策。本集團承諾將環境、社會及管治考慮因素納入其決策過程。為此，本集團確保環境、社會及管治的管治與其策略增長保持一致，同時提倡將環境、社會及管治融入其業務營運。本集團已在集團層面及特定營運層面制定政策，確保環境、社會及管治常規在整個集團保持相同一致。

儘管本集團並無設立環境、社會及管治委員會，本集團管理層每年向董事會匯報年度重要性評估的結果、對本集團營運有重大影響的相關事宜、環境、社會及管治表現，以及與本集團對健康、安全、環境及社會的影響相關的重大風險。我們為董事安排與環境、社會及管治相關的培訓課程，確保董事會具備專業知識，有效監督環境、社會及管治事宜。



### RISK MANAGEMENT

To enhance ESG-related risk management in the Group, Internal Control Review (the “IC Review”) is conducted every six months. Any findings from the IC Review will result in a group discussion with the management to identify any ESG-related risks and opportunities that occurred. The details of the discussion will report to the Board and a meeting will be held with the senior management afterwards if necessary. This process facilitates a continuous process of identifying, evaluating, prioritising, managing and monitoring the ESG-related risks that the Group faces in its daily operations. Therefore, the Board believes the current procedure is adequate to evaluate and minimise risks in a dynamic business environment where economic, industry, regulatory and operating conditions continue to change. The Board will then assess and determine the ESG-related risks and opportunities and consider their implication. Material ESG-related issues are also identified, evaluated and prioritised regularly through the materiality assessment, with consideration of opinions collected from the Group’s stakeholders.

### CONTINUOUS IMPROVEMENT AND MONITORING

The Group strives for continuous improvement and has established the following targets and goals for the near future:

- Following the Group’s measures for energy-saving, material conservation and waste separation to achieve the targets set for greenhouse gas (“GHG”) emissions, energy conservation and reduction of waste generation;

### 風險管理

為加強本集團的環境、社會及管治相關風險管理，本集團每六個月進行一次內部監控審閱（「內部監控審閱」）。本集團將因應內部監控審閱的任何結果與管理層進行集體討論，以識別任何與環境、社會及管治相關的風險及機遇。討論詳情將向董事會匯報，如有需要，將於其後與高級管理層舉行會議。此程序有助持續識別、評估、優先處理、管理及監察本集團於日常營運所面對的環境、社會及管治相關風險。因此，董事會認為目前的程序足以評估及盡量降低於經濟、行業、監管及經營狀況持續轉變的動態業務環境中的風險。董事會其後將評估及釐定環境、社會及管治相關風險及機遇，並考慮其影響。重大環境、社會及管治相關事宜亦透過重要性評估定期識別、評估及排序，並考慮自本集團持份者收集的意見。

### 持續改善及監察

本集團持續精益求精，為不久將來制訂以下目標：

- 遵循本集團的節能、節材及廢棄物分類措施，以實現溫室氣體（「溫室氣體」）排放、節能及減少廢棄物產生的目標；



# THE BOARD STATEMENT

## 董事會聲明

- Evaluating and implementing low-cost measures, capital improvements and new technologies to improve the performance of related investment projects;
  - Providing training to our employees, including the ESG issues, self-assessment and development training, use of sustainable material and recycling information, etc.; and
  - Transparently disclosing our ESG approaches to suppliers and other business partners to enhance the communication among all the parties.
- 評估及實施低成本措施、資本改善及新技術，以改善相關投資項目的表現；
  - 為我們的僱員提供培訓，包括環境、社會及管治事宜、自我評估及發展培訓、可持續物料的使用及回收資訊；及
  - 向供應商及其他業務合作夥伴透明地披露我們的環境、社會及管治方針，以加強各方之間的溝通。

The management team is responsible for monitoring the Group's ESG related performance and reporting to the Board when necessary. The following means are used for monitoring:

管理層團隊負責監察本集團環境、社會及管治相關表現，並在必要時向董事會報告。管理層團隊已應用以下方法以作監察：

- Referring to previous years' assessments, the Group's annual reports and ESG reports on environmental protection, social responsibility and corporate governance;
  - Linking relevant matters that significantly affect the Group's operation in the ESG aspects; and
  - Identifying any significant risks with respect to the Group's impact on health, safety, environment and society issues.
- 參照有關環境保護、社會責任及企業管治方面的過往年度評估、本集團年報以及環境、社會及管治報告；
  - 聯繫對本集團營運有重大影響的環境、社會及管治方面相關事宜；及
  - 識別對本集團於健康、安全、環境及社會事宜的影響的任何重大風險。

# STAKEHOLDERS' ENGAGEMENT AND MATERIALITY

## 持份者參與及重要性

The Group values the input and feedback of its stakeholders as they bring potential impacts to the Group's business. The Group regularly engages stakeholders through the channels shown in the table below. The Group also conducts group discussions with stakeholders to specifically address ESG material topics. During the Reporting Period, the Group has conducted discussions regarding ESG material topics with its printer house and the Branch Registrar.

鑑於持份者可為本集團的業務帶來潛在影響，本集團十分重視持份者的意見與反饋。本集團透過下表所示渠道定期與持份者溝通。本集團與持份者進行小組討論，專門處理環境、社會及管治的重大議題。於報告期間，本集團已與其印刷廠及過戶登記處分處就環境、社會及管治重大議題進行討論。

### Stakeholder Groups

### Communication Channels

### 持份者組別

### 溝通渠道

Employees	<ul style="list-style-type: none"> <li>- Meetings and conferences</li> <li>- Annual employee performance appraisals</li> <li>- Company notices and announcements</li> <li>- Intranet and emails</li> <li>- Staff opinion surveys</li> <li>- Consultative Committee</li> </ul>	僱員	<ul style="list-style-type: none"> <li>- 大會及會議</li> <li>- 年度僱員績效考核</li> <li>- 本公司通告及公告</li> <li>- 內聯網及電郵</li> <li>- 員工意見調查</li> <li>- 諮詢委員會</li> </ul>
Shareholders	<ul style="list-style-type: none"> <li>- Annual Reports</li> <li>- Annual general meetings</li> <li>- Company website</li> <li>- Company notices and announcements</li> <li>- Hotlines</li> </ul>	股東	<ul style="list-style-type: none"> <li>- 年報</li> <li>- 股東週年大會</li> <li>- 公司網址</li> <li>- 本公司通告及公告</li> <li>- 熱線</li> </ul>
Clients	<ul style="list-style-type: none"> <li>- Meetings</li> <li>- Company website</li> </ul>	客戶	<ul style="list-style-type: none"> <li>- 大會</li> <li>- 公司網址</li> </ul>
Suppliers, service providers or contractors	<ul style="list-style-type: none"> <li>- Meetings</li> <li>- Company website</li> </ul>	供應商、服務供應商或承包商	<ul style="list-style-type: none"> <li>- 大會</li> <li>- 公司網址</li> </ul>

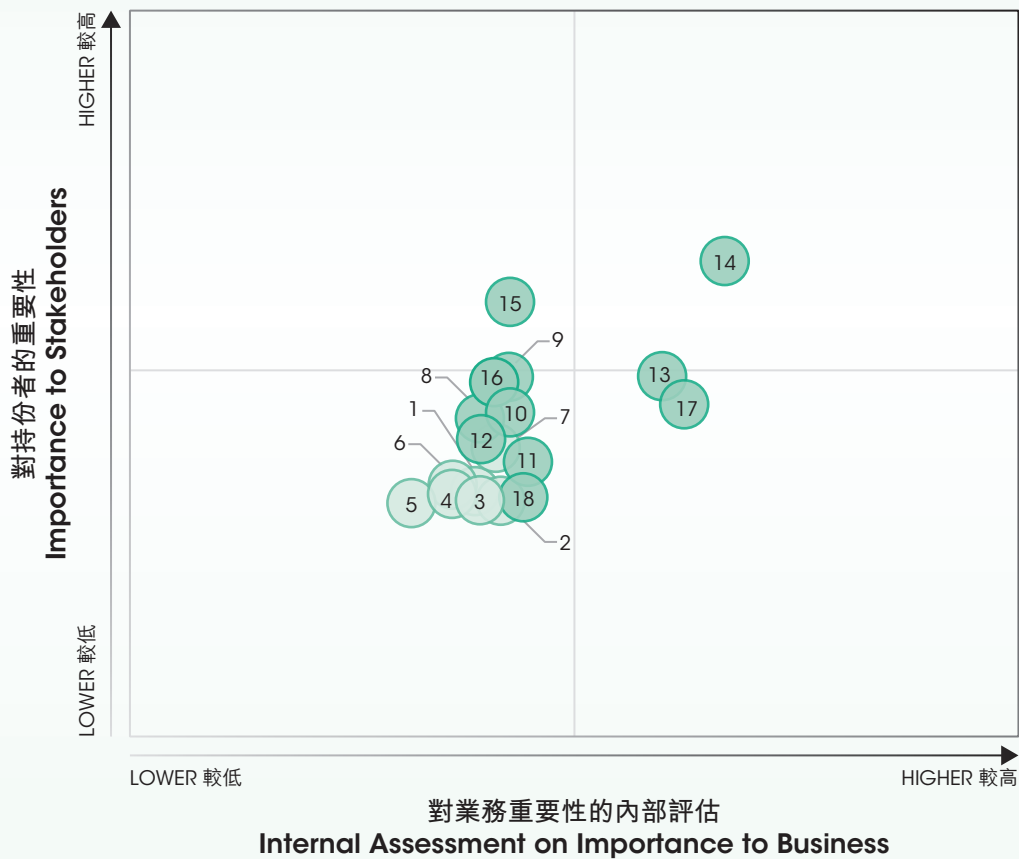
# STAKEHOLDERS' ENGAGEMENT AND MATERIALITY

## 持份者參與及重要性

During the Reporting Period, the Group has specifically engaged its internal and external stakeholders including directors, frontline staff, management, customers and third-party consultants to gain further insights on material aspects and challenges of its ESG matters via questionnaires. Based on the feedback collected, a materiality matrix was developed.

於報告期間，本集團特別邀請其內部及外部持份者（包括董事、前線員工、管理層、客戶及第三方顧問）參與，透過問卷進一步了解其環境、社會及管治事宜的重大方面及挑戰。根據所收集的反饋，我們制定了重要性矩陣。

持份者參與所反映不同議題的重要性  
Materiality of Different Topics from Stakeholder Engagement



# STAKEHOLDERS' ENGAGEMENT AND MATERIALITY

## 持份者參與及重要性

### A. Environmental

- 1 Energy
- 2 Water
- 3 Air Emission
- 4 Waste and Effluent
- 5 Other Raw Materials Consumption
- 6 Environmental Protection Measures
- 7 Climate Change

### B. Social

- 8 Employment
- 9 Occupational Health and Safety
- 10 Development and Training
- 11 Labour Standards
- 12 Supplier Management
- 13 Intellectual Property
- 14 Data Protection
- 15 Customer Service
- 16 Product/Service Quality
- 17 Anti-corruption
- 18 Community Investment

Among the environmental and social aspects, the followings have been deemed as the most important by stakeholders:

- Data protection
- Intellectual property
- Anti-corruption
- Customer service
- Occupational health and safety

As in the previous reporting period, material issues that are important to both stakeholders and the Group's business development were social issues. In contrast, environmental issues were deemed to be less significant. The Group has identified data protection, anti-corruption, and occupational health and safety as key material issues since the previous year. During the Reporting Period, IPs and customer service emerged as additional key material issues for the Group.

### 環境

- 1 能源
- 2 水
- 3 廢氣排放
- 4 廢棄物及廢水
- 5 其他原料耗量
- 6 環保措施
- 7 氣候變化

### 社會

- 8 僱傭
- 9 職業健康與安全
- 10 發展及培訓
- 11 勞工準則
- 12 供應商管理
- 13 知識產權
- 14 資料保障
- 15 客戶服務
- 16 產品／服務質素
- 17 反貪污
- 18 社區投資

在環境及社會層面方面，以下為持份者視為最重要的事項：

- 資料保障
- 知識產權
- 反貪污
- 客戶服務
- 職業健康與安全

一如過往報告期間，對持份者及本集團業務發展而言屬重要議題為社會議題。相反，環境問題被視為較次要。本集團自去年起已識別資料保障、反貪污及職業健康與安全為關鍵重要議題。於報告期間，知識產權及客戶服務成為本集團的額外重要議題。



# STAKEHOLDERS' ENGAGEMENT AND MATERIALITY

## 持份者參與及重要性

During the Reporting Period, the Group has organised several training sessions and group discussions regarding the key material topics identified in the last reporting period. The discussion for material topics raised for this Reporting Period will be held in the next reporting period. Concerning data protection and labour practices, the Group will keep employees updated regarding any amendments in policies and guidelines from the Labour Department and the Office of Privacy Commissioner for Personal Data ("PCPD"). When compared to the last reporting period, IPs and customer service are new material topics raised. The Group has established enquiry channels in both its Hong Kong and Zhuhai offices to facilitate the sharing of IPs information across borders and prevent any IPs rights violations by the Group or its customers. This measure aimed at improving the accessibility and ease of obtaining IPs-related information, as well as promoting compliance with IPs laws and regulations.

The key material aspects will be strictly managed through the Group's policies and guidelines. The Group will continue to improve its ESG management and performance by actively communicating with its stakeholders and constantly reviewing and improving its internal policies.

於報告期間，本集團已就上一報告期間識別的關鍵重要議題組織若干培訓課程及小組討論。本報告期間提出的重要議題討論將於下一個報告期間舉行。就資料保障及勞工常規而言，本集團將向僱員提供有關勞工處及個人資料私隱專員公署（「個人資料私隱專員公署」）政策及指引的任何修訂的最新資料。與上一報告期間相比，知識產權及客戶服務為新提出的重大議題。本集團已在香港及珠海辦事處設立查詢渠道，促進跨境共享知識產權資料及防止本集團或其客戶侵犯任何知識產權。該措施旨在令知識產權相關資料的獲取更簡易方便，以及促進遵守知識產權法律法規。

關鍵重大議題將按本集團政策及指引嚴格管理。本集團將積極與持份者溝通，並不斷檢討及改善其內部政策，繼續改善其環境、社會及管治管理及表現。



# STAKEHOLDERS' FEEDBACK

## 持份者反饋



The Group welcomes stakeholders' feedback on the environmental, social and governance approach and performance by giving suggestions or sharing views via email at [ir@culturecom.com.hk](mailto:ir@culturecom.com.hk).

本集團歡迎持份者就環境、社會及管治方針及表現提出反饋，透過電郵至[ir@culturecom.com.hk](mailto:ir@culturecom.com.hk)提供建議或分享意見。





## A1. Emissions

As a non-manufacturing company, the Group poses insignificant negative impacts on the environment. The Group does not produce exhaust gas and hazardous waste emissions in daily operations. Direct and indirect environmental impacts generated by the Group are mainly from the following activities: 1) consumption of petrol (for Group-owned vehicles) and purchased electricity; 2) business air travel, and 3) paper and water consumption.

The Group strictly abides by laws, rules and regulations enforced by the PRC and Hong Kong in relation to environmental protection and pollution control, including but not limited to the followings:

- Environmental Protection Law of the PRC;
- Energy Conservation Law of the PRC; and
- Law of the PRC on the Prevention and Control of Environmental Pollution by Solid Waste.

No cases of material non-compliance with relevant laws and regulations that have a significant impact on the Group relating to air and GHG emissions, discharges into water and land, and generation of hazardous and non-hazardous waste had been recorded during the Reporting Period.

## A1. 排放

作為一間非製造業公司，本集團對環境產生的負面影響甚微。本集團於日常營運中並無產生廢氣和有害廢棄物排放。本集團產生的直接及間接環境影響主要來自以下活動：1) 消耗汽油(本集團擁有的車輛)及購買電力；2) 商務航空差旅；及3) 消耗紙張及用水。

本集團嚴格遵守中國及香港在環境保護及污染控制方面所執行的法律、規例及法規，包括但不限於以下各項：

- 中國環境保護法；
- 中國節約能源法；及
- 中國固體廢物污染環境防治法。

於報告期間，概無錄得有關廢氣及溫室氣體排放、向水及土地的排污以及產生有害及無害廢棄物且對本集團有重大影響的相關法律及法規的重大違反事件。

## A1. Emissions (Continued)

### A1.1 Air Emissions

During the Reporting Period, passenger cars operated on petrol were used for daily transportation. The mobile combustion generated several air emissions including nitrogen oxides ("NO<sub>x</sub>"), sulphur oxides ("SO<sub>x</sub>") and respiratory suspended particles ("PM"). There was an overall increase in the emissions of NO<sub>x</sub>, SO<sub>x</sub> and PM due to the operation of an additional vehicle of the Group during the Reporting Period.

## A1. 排放 (續)

### A1.1 廢氣排放

於報告期間，使用汽油的私家車乃用於日常交通。移動燃燒會產生若干廢氣排放物，包括氮氧化物（「氮氧化物」）、硫氧化物（「硫氧化物」）及可吸入懸浮粒子（「懸浮粒子」）。於報告期間，由於本集團額外汽車營運，氮氧化物、硫氧化物及懸浮粒子的排放整體增加。

	Mobile fuel source 汽車燃料來源	Air emissions (non-GHG) from the vehicle 汽車產生的廢氣排放 (非溫室氣體)		
		SO <sub>x</sub> (kg) 硫氧化物 (公斤)	NO <sub>x</sub> (kg) 氮氧化物 (公斤)	PM (kg) 懸浮粒子 (公斤)
FY2021/22 二零二一／二二財政年度	Petrol 汽油	0.01	0.20	0.01
FY2022/23 二零二二／二三財政年度	Petrol 汽油	0.04	2.21	0.16
Note 1:	Emission factors for calculations on environmental parameters throughout the report were referred to Appendix 27 to the Main Board Listing Rules and the referred documentation as set out by HKEX unless stated otherwise.	附註1：除另有指明外，整份報告中有關環境參數計算的排放系數乃參考聯交所訂主板上市規則附錄二十七及其載列的參考文件。		
Note 2:	There was no change to the calculation methodologies used for the Reporting Period and the previous reporting period.	附註2：報告期間及上一報告期間所用的計算方法並無變動。		





## A1. Emissions (Continued)

### A1.2 Greenhouse Gas Emissions

During the Reporting Period, 37.71 tonnes of carbon dioxide equivalent (“tCO<sub>2eq</sub>”) were emitted, resulting in an intensity of 0.03 tCO<sub>2eq</sub>/m<sup>2</sup>. The overall GHG emission intensity dropped by 54% when compared to the last reporting period. The drop of GHG emission intensity was mainly due to the restructuring of the Group’s operation and the reduced consumption of petrol, purchased electricity, fresh water and generation of paper wastes during the COVID-19 pandemic. The reported GHG emissions were attributed to the following activities:

- Direct (scope 1) GHG emissions: the mobile combustion of fuels for transportation;
- Indirect (scope 2) GHG emissions: purchased electricity; and
- Other Indirect (scope 3) GHG emissions: fresh water and sewage processing, and paper waste disposal at landfills.

## A1. 排放 (續)

### A1.2 溫室氣體排放

於報告期間，本集團的排放量為37.71噸二氧化碳當量(tCO<sub>2eq</sub>)，密度為每平方米0.03噸二氧化碳當量。整體溫室氣體排放密度較上一報告期間下降54%。溫室氣體排放密度下降乃主要由於本集團業務重組及2019冠狀病毒病疫症期間減少消耗汽油、購買電力、淡水及產生廢紙。所報告的溫室氣體排放乃來自以下活動：

- 直接(範圍1)溫室氣體排放：用於交通工具燃燒之燃料；
- 間接(範圍2)溫室氣體排放：購買電力；及
- 其他間接(範圍3)溫室氣體排放：淡水與污水處理及於堆填區處置的廢紙。



## A1. Emissions (Continued)

### A1.2 Greenhouse Gas Emissions (Continued)

## A1. 排放 (續)

### A1.2 溫室氣體排放 (續)

Scope	Emission sources	GHG	GHG
		Emissions in FY2022/23 (in tCO <sub>2eq</sub> ) 二零二二/二三 財政年度 溫室氣體 排放量(噸 二氧化碳當量)	emissions in FY2021/22 (in tCO <sub>2eq</sub> ) 二零二一/二二 財政年度 溫室氣體 排放量(噸 二氧化碳當量)
範圍	排放來源		
<b>Scope 1</b> <b>Direct GHG emission</b> 範圍1 直接溫室氣體排放	Petrol 汽油	<b>6.77</b>	1.03
<b>Scope 2</b> <b>Indirect GHG emission</b> 範圍2 間接溫室氣體排放	Purchased electricity 購買電力	<b>28.89</b>	53.44
<b>Scope 3</b> <b>Other Indirect GHG emission</b> 範圍3 其他間接溫室氣體排放	Fresh water processing 淡水處理	<b>&lt;0.01</b>	<0.01
	Sewage processing 污水處理	<b>&lt;0.01</b>	<0.01
	Paper waste disposed at landfills 於堆填區處置的廢紙	<b>1.06</b>	0.50
	Business air travel 商務航空差旅	<b>0.99</b>	0
<b>Total GHG Emission (in tCO<sub>2eq</sub>)</b> 總溫室氣體排放量(噸二氧化碳當量)		<b>37.71</b>	54.97
<b>GHG Emission Intensity (in tCO<sub>2eq</sub>/m<sup>2</sup>)</b> 溫室氣體排放密度(噸二氧化碳當量/平方米)		<b>0.03</b>	0.04



## A1. Emissions (Continued)

### A1.2 Greenhouse Gas Emissions (Continued)

- Note 1: Emission factors were made by reference to Appendix 27 to the Listing Rules and their referred documentation as set out by the HKEX, unless stated otherwise. Scope 3 emissions were only calculated based on the available emission factors from the referred documentation.
- Note 2: Emission factors for purchased electricity in Admiralty and Tsuen Wan were obtained from Hong Kong Electric (HKE) and CLP Power Hong Kong Limited (CLP). Combined margin emission factor of 0.581 tCO<sub>2</sub>/MWh and 0.6101 tCO<sub>2</sub>/MWh were used for purchased electricity in FY2022/23 and 2021/22 respectively, according to the Ministry of Ecology and Environment of People's Republic of China.
- Note 3: For FY2022/23, the electricity consumption of Beijing office was an estimated consumption since consumption data was not accessible due to the inclusion of electricity consumption fee in the rent of the office. Similarly, electricity consumption of Zhuhai office was included in the rent of the office, and estimated consumption was not available due to inadequate historical data. Therefore, no consumption data was recorded for Zhuhai office.
- Note 4: There was no change to the calculation methodologies used for the Reporting Period and the previous reporting period.

## A1. 排放 (續)

### A1.2 溫室氣體排放 (續)

- 附註1：除另有說明外，排放系數乃參考聯交所上市規則附錄二十七及其指定文件而作出。範圍3排放量僅根據參考文件中的可用排放系數計算。
- 附註2：金鐘及荃灣購買電力的排放系數來自香港電燈(港燈)及中華電力有限公司(中華電力)。根據中華人民共和國生態環境部的資料，用於二零二二/二三財政年度及二零二一/二二財政年度購買電力的合併邊際排放系數分別為0.581噸二氧化碳/兆瓦時及0.6101噸二氧化碳/兆瓦時。
- 附註3：於二零二二/二三財政年度，北京辦公室的電力消耗為估計消耗，原因是由於電力消耗費用計入辦公室租金，無法獲得消耗數據。同樣地，珠海辦公室的電力消耗計入辦公室租金，而由於過往數據不足，故無法獲得估計消耗。因此，珠海辦公室並無錄得消耗數據。
- 附註4：報告期間及上一報告期間所用的計算方法並無變動。

## A1. Emissions (Continued)

### A1.3 Hazardous Waste

The Group's business disposed of 4.00 kg of hazardous waste, which includes waste batteries and waste electronic and electrical equipment, representing an intensity of 0.004 kg/m<sup>2</sup>. Hazardous waste was collected by licensed handlers for proper recycling or treatment before disposal. During the Reporting Period, the generation intensity of hazardous waste increased primarily because of the rise in disposal of malfunctioned computer hardware in the offices located in the PRC.

## A1. 排放 (續)

### A1.3 有害廢棄物

本集團的業務處置4.00公斤的有害廢棄物，其中包括廢棄電池以及廢棄電子及電氣設備，密度為每平方米0.004公斤。有害廢棄物由持牌處理商收集，以便於處置前作妥善回收或處理。於報告期間，有害廢棄物的產生密度增加，主要由於處置位於中國辦公室的故障電腦硬件增加。

Hazardous Waste Data	Waste Generation in FY2022/23 二零二二/ 二三財政年度 廢棄物產生	Waste Generation in FY2021/22 二零二一/ 二二財政年度 廢棄物產生
Hazardous waste (in kg) 有害廢棄物 (公斤)	4.00	2.99
Hazardous waste generation intensity (in kg/m <sup>2</sup> ) 有害廢棄物產生密度 (公斤/平方米)	0.004	0.002



## A1. Emissions (Continued)

### A1.4 Non-hazardous Waste

Non-hazardous waste generated by the Group's business operation during the Reporting Period included waste office paper and general office waste. A total of 0.22 tonnes of waste office paper and 5.08 tonnes of general office wastes were generated during the Reporting Period. The waste intensity was 4.62 kg/m<sup>2</sup>. The general office wastes included daily wastes at offices and outdated comic wastepaper. During the Reporting Period, the generation intensity of non-hazardous waste increased primarily because of the rise in disposal of outdated comic wastepaper.

## A1. 排放 (續)

### A1.4 無害廢棄物

於報告期間，本集團業務營運產生的無害廢棄物包括辦公室廢紙及一般辦公室廢棄物。於報告期間，本集團產生合共0.22噸辦公室廢紙及5.08噸一般辦公室廢棄物。廢棄物密度為每平方米4.62公斤。一般辦公室廢棄物包括辦公室的日常廢棄物及過時的漫畫廢紙。於報告期間，無害廢棄物的產生密度增加主要由於處置過時的漫畫廢紙增加。

Non-hazardous Waste Data	Waste Generation in FY2022/23 二零二二/ 二三財政年度 廢棄物產生量	Waste Generation in FY2021/22 二零二一/ 二二財政年度 廢棄物產生量
無害廢棄物數據		
Waste office paper (in tonnes) 辦公室廢紙 (噸)	0.22	0.12
General office waste (in tonnes) 一般辦公室廢棄物 (噸)	5.08	4.22
Total non-hazardous waste (in tonnes) 無害廢棄物總量 (噸)	5.30	4.34
Total non-hazardous waste generation intensity (in kg/m <sup>2</sup> ) 無害廢棄物產生密度總量 (公斤/平方米)	4.62	2.89

## A1. Emissions (Continued)

### A1.5 Emissions Mitigation Measures and Targets

The Group is aware of the emissions generated from its operations. To reduce indirect emissions generated from business air travel, the Group encourages online communications, such as Tencent meetings, WeChat and conference calls, with its business partners and colleagues among the offices in different regions. When business travel is needed, employees shall submit an application to the senior management and CEO for review and approval. Except for special and essential conditions, employees and management are only allowed to travel in economy class. The Group keeps track of employees' business travels and their relative carbon emissions for analysis and improvement.

Only high-quality fuel is used in Group's vehicles. The Group conducts regular inspections and maintenance of vehicles to reduce air and carbon emissions. To further reduce emissions, the Group has decided to switch to low-emission vehicles or zero-emission vehicles in the future. Furthermore, the Group encourages employees to take public transportation when commuting to work.

## A1. 排放 (續)

### A1.5 減排措施及目標

本集團注意到其營運產生的排放量。為減少商務航空差旅所產生的間接排放，本集團鼓勵以騰訊會議、微信及電話會議等線上方式與業務夥伴及不同地區辦公室的同事進行溝通。當需要進行商務差旅時，僱員須向高級管理層及行政總裁提交申請以供審核及批准。除特殊及必要情況外，僱員及管理層差旅僅可乘坐經濟艙。本集團會記錄僱員的商務差旅及其相關碳排放以作分析及改進。

本集團的汽車僅使用優質燃料。本集團定期進行車輛檢查及維修以減少廢氣及碳排放。為進一步減少排放，本集團已決定於未來轉用低排放車輛或零排放車輛。此外，本集團鼓勵僱員乘搭公共交通工具上下班。

## A1. Emissions (Continued)

### A1.5 Emissions Mitigation Measures and Targets (Continued)

The Group acknowledges the importance of reducing the carbon footprint incurred by its supply chain. Therefore, it places preferences on suppliers located closer to the Group's offices to reduce the carbon footprint from the process of product delivery.

By encouraging the use of electric vehicles, the Group targets to reduce GHG emissions by 5% by FY2031/32 compared to FY2021/22.

## A1. 排放 (續)

### A1.5 減排措施及目標 (續)

本集團深知減少其供應鏈產生的碳足跡的重要性。因此，本集團優先考慮鄰近本集團辦公室的供應商，以減少產品交付過程中的碳足跡。

透過鼓勵使用電動汽車，本集團的目標是於二零三一／三二財政年度前將溫室氣體排放較二零二一／二二財政年度減少5%。

Indicator 指標	Baseline (FY2021/22) 基線(二零二一／二二財政年度)	Target (FY2031/32) 目標(二零三一／三二財政年度)	Reporting Period Performance 報告期間績效	Progress 進度
<b>Total GHG emissions</b>	54.97 tCO <sub>2eq</sub>	Reduce the GHG emission by 5%, implying a total GHG emission of 52.22 tCO <sub>2eq</sub>	37.71 tCO <sub>2eq</sub>	Achieved and will continue to maintain this emission level to ensure achievement of target
溫室氣體排放總量	54.97噸二氧化碳當量	將溫室氣體排放量減少5%，即溫室氣體總排放量為52.22噸二氧化碳當量	37.71噸二氧化碳當量	已達到並將繼續維持此排放水平，確保達成目標



## A1. Emissions (Continued)

### A1.6 Wastes Reduction Initiatives and Targets

When disposing of hazardous electronic wastes, the Group follows the national and local laws and related regulations, such as the Law of the PRC on the Prevention and Control of Environmental Pollution by Solid Waste.

The Group supports and promotes Green Office initiatives. The following measures have been implemented to reduce waste generation:

- Reusing envelopes, kraft envelopes and files;
- Sharing office supplies such as staplers and hole punchers;
- Replacing paper cups with glass cups;
- Providing recycling bins with clear instructions;
- Reusing festive decorations whenever possible;
- Encouraging employees to reuse red envelopes during the Chinese New Year;

## A1. 排放 (續)

### A1.6 減廢措施及目標

處理有害電子廢棄物時，本集團遵循國家及本地法律及相關法規，例如中國固體廢物污染環境防治法。

本集團支持及推行綠色辦公室措施。我們已實施以下措施以減少產生廢棄物：

- 重用信封、公文袋及文件夾；
- 共用釘書機及打孔機等辦公用具；
- 以玻璃杯代替紙杯；
- 設置多個回收箱，並附上清晰指示；
- 盡可能重覆使用節日裝飾品；
- 鼓勵僱員於農曆新年重用紅封包；





## A1. Emissions (Continued)

### A1.6 Wastes Reduction Initiatives and Targets (Continued)

- Encouraging employees to print office paper on both sides; and
- Performing office administration processes in digital means whenever possible.

Obsolete stock (such as old comic books, and unsold and recalled books) is stored in the Group's warehouse. After a certain period, the obsolete stock in inventory will be collected by licensed recyclers. In the coming years, the Group has planned to adopt Forest Stewardship Council ("FSC") certified paper for its bulk printing activities.

#### Targets and Performance Review

With the above-mentioned measures, the Group aims to reduce the total waste generation by 5% compared to FY2021/22 by FY2031/32. The Group is aware that the total waste generation has increased during the Reporting Period and will continue to monitor the waste generation performance to ensure achievement of the waste reduction target.

## A1. 排放 (續)

### A1.6 減廢措施及目標 (續)

- 鼓勵僱員雙面打印辦公室用紙；及
- 盡可能以數碼方式執行辦公室行政程序。

陳舊存貨(例如往期漫畫書及未售出及回收書籍)均存放於本集團的倉庫。於存放一段時間後,有關陳舊存貨會經由持牌回收商收集。於未來數年,本集團計劃就其批量印刷活動採用森林管理委員會(「森林管理委員會」)認證紙張。

#### 目標及表現回顧

透過上述措施,本集團旨在於二零三一/三二財政年度前將總廢棄物產生較二零二一/二二財政年度減少5%。本集團意識到,於報告期間,總廢棄物產生有所增加,並將繼續監察廢棄物產生績效,確保實現減廢目標。

## A1. Emissions (Continued)

### A1.6 Wastes Reduction Initiatives and Targets (Continued)

#### Targets and Performance Review (Continued)

Indicator 指標	Baseline (FY2021/22) 基線(二零二一/ 二二財政年度)	Target (FY2031/32) 目標(二零三一/ 三二財政年度)	Reporting Period Performance 報告期間績效	Progress 進度
	<b>Total waste generation<sup>1</sup></b> 總廢棄物產生 <sup>1</sup>	4.34 tonnes 4.34噸	Reduce the total waste generation by 5%, implying a total waste generation of 4.12 tonnes. 將總廢棄物產生減少5%，即總廢棄物產生為4.12噸。	5.30 tonnes 5.30噸

#### Paper Use Efficiency Initiatives

Creating a paperless working environment not only reduces environmental damage but also fits commercial goals, as it helps save space, facilitates information sharing via IT networks, and reduces complicated documentation procedures.

## A1. 排放(續)

### A1.6 減廢措施及目標(續)

#### 目標及表現回顧(續)

Reporting Period Performance Progress

報告期間績效 進度

#### 用紙效益措施

建立無紙工作環境有助節省空間、促進透過資訊科技網絡的資訊分享及減少繁複的文書程序，不僅減低環境損害，更符合商業目的。

<sup>1</sup> The term "total waste generation" refers to the combined amount of both hazardous and non-hazardous wastes that were generated over the course of each financial year.

<sup>1</sup> 「總廢棄物產生」一詞指各財政年度所產生有害及無害廢棄物的總量。



## A1. Emissions (Continued)

### A1.6 Wastes Reduction Initiatives and Targets (Continued)

#### Paper Use Efficiency Initiatives (Continued)

The Group encourages the use of electronic documents for internal and external communication. Most office documents are digitalized to save space and reduce paper use. The Group strongly recommends shareholders access its corporate communications, including financial reports and other business documents, through the HKEX's or its website, instead of printed versions. By introducing electronic means of corporate communications to shareholders, the quantity of printed materials has been considerably reduced. This paperless practice helps protect the environment, as well as save costs on printing and administration, etc.

The Group suggests its employees use the "print preview" function to check the layout of documents and adjust the margins and font size of documents before printing to optimize the use of paper. The Group also encourages duplex printing and copying, while the single-side printed paper is collected and reused in offices. Paper recycling bins are set to collect used paper, old newspapers and magazines.

## A1. 排放 (續)

### A1.6 減廢措施及目標 (續)

#### 用紙效益措施 (續)

本集團鼓勵使用電子文件作內部及外部溝通。大部分辦公室文件均已數碼化，從而節省空間及用紙。本集團強烈建議股東透過聯交所或其網站查閱財務報告及其他商業文件等企業通訊，以取代印刷本。本集團向股東介紹企業通訊電子版本後，印刷量已大幅減少。此項無紙化措施有助保護環境，同時節省印刷及行政等成本。

本集團建議僱員在印刷前使用「印刷預覽」功能檢查文件版面配置及調整文件邊界與字型大小，務求紙盡其用。本集團亦鼓勵雙面印刷及複印，並於辦公室收集單面打印紙張作重用，同時設置廢紙回收箱收集廢紙、舊報紙及雜誌。

## A2. Use of Resources

The Group upholds and promotes the principle of effective use of resources. The Group is committed to optimising natural resources. To meet the Group's environmental commitments, various efficiency initiatives have been implemented to minimise energy use and water consumption.

### A2.1 Energy Consumption

During the Reporting Period, purchased electricity and petrol were consumed for office and warehouse operations, and transportation respectively. A total of 58,678 kWh electricity consumption was recorded. The consumption of petrol was 2,538.95 Litres. The total energy consumption was calculated to be 83,284 kWh, resulting in an overall energy intensity of 75.77 kWh/m<sup>2</sup> during the Reporting Period.

Compared to the previous reporting period, the overall energy intensity has increased by 10%, which can be attributed mainly to the operation of an additional vehicle owned by the Group. As a result, energy consumption from petrol has increased.

## A2. 資源使用

本集團奉行及推行有效使用資源的原則。本集團致力善用天然資源。為履行本集團對環境的承諾，本集團已實行多項效益措施以減少能源使用及耗水量。

### A2.1 能源耗量

於報告期間，購買電力及汽油分別用於辦公室及倉庫運作以及交通，總計錄得58,678千瓦時電力消耗量。汽油消耗量為2,538.95升。於報告期間，能源總耗量經計算為83,284千瓦時，能源總密度為每平方米75.77千瓦時。

與上一報告期間相比，整體能源密度已增加10%，主要歸因於本集團擁有的額外汽車營運。因此，汽油的能源消耗有所增加。



## A2. Use of Resources (Continued)

### A2.1 Energy Consumption (Continued)

Energy Consumption Sources	Consumption (in individual unit)	Consumption in FY2022/23 (in kWh) 二零二二／二三財政年度 消耗量 (千瓦時)	Consumption in FY2021/22 (in kWh) 二零二一／二二財政年度 消耗量 (千瓦時)
能源消耗來源	消耗量 (按自有單位)		
Purchased Electricity 購買電力	58,678 kWh 58,678千瓦時	<b>58,678</b>	98,962
Petrol 汽油	2,538.95 Litres 2,538.95升	<b>24,606</b>	3,761
<b>Total Energy Consumption (in kWh)</b> 能源總耗量 (千瓦時)		<b>83,284</b>	102,723

**Total Energy Consumption Intensity (in kWh/m<sup>2</sup>)**  
能源總耗量密度 (千瓦時／平方米)

**75.77**                      68.71

Note 1: Conversion factors were referred to in the IEA Energy Statistics Manual and 2006 IPCC Guidelines for National Greenhouse Gas Inventories.

附註1：換算系數乃參考國際能源署能源統計手冊及2006年IPCC國家溫室氣體清單指南。

Note 2: For FY2022/23, the electricity consumption of Beijing office was an estimated consumption since consumption data was not accessible due to the inclusion of electricity consumption fee in the rent of the office. Similarly, electricity consumption of Zhuhai office was included in the rent of the office, and estimated consumption was not available due to inadequate historical data. Therefore, no consumption data was recorded for Zhuhai office.

附註2：於二零二二／二三財政年度，北京辦公室的電力消耗為估計消耗，原因是由於電力消耗費用計入辦公室租金，無法獲得消耗數據。同樣地，珠海辦公室的電力消耗計入辦公室租金，而由於過往數據不足，故無法獲得估計消耗。因此，珠海辦公室並無錄得消耗數據。

Note 3: There was no change to the calculation methodologies used for the Reporting Period and the previous reporting period.

附註3：報告期間及上一報告期間所用的計算方法並無變動。

## A2. Use of Resources (Continued)

### A2.2 Water Consumption

The drinking water consumption of the Group was 0.648 m<sup>3</sup>, resulting in an intensity of 0.0006 m<sup>3</sup>/m<sup>2</sup>. During the Reporting Period, the water consumption intensity increased by 16% when compared to the previous reporting period. This was mainly due to a surge in freshwater consumption by employees working in the office after resuming to normal work arrangements, following a period of working from home due to the COVID-19 pandemic in previous years. The water consumption included only the office in Admiralty, Hong Kong since the consumption in the other premises within the reporting scope was centrally managed by the property management offices of premises, and the Group did not have control over the water consumption or any relevant water saving initiatives. There was no issue in sourcing water that is fit for purpose.

## A2. 資源使用 (續)

### A2.2 耗水量

本集團的飲用水消耗量為0.648立方米，密度為每平方米0.0006立方米。於報告期間，耗水量密度較上一報告期間增加16%。此乃主要由於過往年度2019冠狀病毒病疫症導致居家工作一段時間，在辦公室工作的僱員恢復正常工作安排後，淡水消耗激增所致。耗水量僅包括位於香港金鐘的辦公室，因為報告範圍內其他物業的耗水量由物業的物業管理辦公室集中管理，而本集團對耗水量或任何相關節水措施並無控制權。在求取適用水源上概無任何問題。

Water Consumption	Consumption in FY2022/23 二零二二/ 二三財政年度 消耗量	Consumption in FY2021/22 二零二一/ 二二財政年度 消耗量
耗水量	0.648	0.756
Water consumption (in m <sup>3</sup> ) 耗水量 (立方米)	0.648	0.756
Water Consumption Intensity (in m <sup>3</sup> /m <sup>2</sup> ) 耗水量密度 (立方米/平方米)	0.0006	0.0005



## A2. Use of Resources (Continued)

### A2.3 Energy Use Efficiency Initiatives and Targets

The Group has been actively establishing and promoting energy-saving initiatives in the offices and warehouse. Employees at offices are advised to set the air conditioning at 25° C for energy-saving purposes. For unoccupied rooms, air conditioning must be switched off. When the offices are partly occupied, non-essential lighting is switched off. Employees shall turn off office lights, air conditioners, printers and computers before leaving. The Group purchased refrigerators with the highest energy efficiency (Level 1 on Energy Label) and replace broken bulbs with LED lights. The automatic water boiling function of the drinking water dispensers at offices is shut down after office hours, according to the programmed timer. In the Hong Kong offices, water dispensers are certified by the Hong Kong Electrical and Mechanical Services Department (“EMSD”) for their electricity consumption rating.

The Group also encourages its employees to follow the dress code of smart casual on weekdays, and casual wear is allowed on Friday, to reduce energy consumption for air conditioning.

## A2. 資源使用 (續)

### A2.3 節約能源措施及目標

本集團一直積極建立及推廣辦公室及倉庫節能計劃，如建議辦公室僱員將空調設置於攝氏25度，以達致節能目的；閒置房間必須關閉空調；當局部使用辦公室時，關上不必要的照明；僱員離開辦公室前須關閉辦公室電燈、空調、打印機及電腦；本集團購買能源效益最高（一級能源標籤）的雪櫃，並於需要更換電燈時安裝LED電燈；在辦公時間後，根據程式時間掣，關閉辦公室內飲水機的自動沸水功能；香港辦公室的飲水機均通過香港機電工程署（「機電工程署」）的電力消耗評級。

本集團亦鼓勵僱員於平日遵從半正式便服的服裝要求，而於星期五則可穿著休閒裝，從而減低空調造成的能源耗量。

## A2. Use of Resources (Continued)

### A2.3 Energy Use Efficiency Initiatives and Targets (Continued)

With the above-mentioned measures, the Group aims to reduce energy consumption by 5% compared to FY2021/22 by FY2031/32.

## A2. 資源使用 (續)

### A2.3 節約能源措施及目標 (續)

透過上述措施，本集團旨在於二零三一／三二財政年度前將能源消耗較二零二一／二二財政年度減少5%。

Indicator 指標	Baseline (FY2021/22) 基線 (二零二一／ 二二財政年度)	Target (FY2031/32) 目標 (二零三一／ 三二財政年度)	Reporting Period Performance 報告期間績效	Progress 進度
	<b>Energy Consumption</b> 能源耗量	102,723 kWh 102,723 千瓦時	Reduce the total energy generation by 5%, implying a total energy generation of 97,587 kWh. 將總能源產生量減少5%，即總能源產生量97,587千瓦時。	83,284 kWh 83,284 千瓦時





## A2. Use of Resources (Continued)

### A2.4 Water Use Efficiency Initiatives and Targets

The Group's business does not involve heavy use of water, and thus no formal policy has been implemented. Since the Group's water use is minimal and water use was not deemed as a material topic by the materiality assessment, the Group has not set water saving targets during the Reporting Period. However, employees are encouraged to reduce the unnecessary use of fresh water. When applicable, water is recycled for watering indoor plants. The Group will regularly review the necessity of setting water-saving targets.

### A2.5 Packaging Materials

Printed books are one of the main products of the Group. Plastic covers are used for book packaging in outsourced printer factories. The Group encourages the factories to properly plan the use of raw materials and packaging materials, like degradable plastic materials, to enhance the economic and environmental benefits to the greatest extent. Due to the insignificant amount of plastic cover consumption, data was not quantitatively recorded.

## A2. 資源使用 (續)

### A2.4 節約用水措施及目標

本集團的業務並不涉及大量用水，故並無實行正式政策。由於本集團的用水量極少，且根據重要性評估，用水量不被視為重大議題，因此本集團於報告期間並無設定節水目標。然而，我們鼓勵僱員減少不必要的淡水使用。倘適用，本集團會使用循環再用水澆灌室內植物。本集團將定期檢討設定節水目標的必要性。

### A2.5 包裝材料

印刷書為本集團主要產品之一。我們透過外包印刷廠使用塑膠套包裝書籍。本集團鼓勵廠商妥善規劃原材料及包裝材料(如可分解塑膠物料)的使用，從而最大程度提高經濟及環保效益。由於塑膠套使用量甚少，故並無記錄量化數據。



## A3. The Environment and Natural Resources

### A3.1 Significant Impacts of Activities on the Environment

The Group's operations did not cause any significant adverse impacts on the environment and natural resources. The Group continuously monitors its air emission, wastewater discharge, and noise level to ensure minimal impacts on the surrounding environment and the creation of a healthy environment for its workers. The Group did not receive any complaints from the surrounding communities regarding air pollution, odour, noise, or night light pollution.

## A4. Climate Change

Climate change is a global challenge that poses significant risks and opportunities for businesses across different industries. While the Group has not been significantly affected by climate risks so far, it recognises the potential impact that climate physical and transition risks could have on its operations and profitability. As such, the Group has identified relevant climate risks and opportunities, assessed their potential financial impacts and developed corresponding management approaches. This year, the Group has taken its first step to disclosing its climate-related information aligning with the four core elements, namely, Governance, Strategy, Risk Management and Metrics and Targets of TCFD Framework.

## A3. 環境及天然資源

### A3.1 業務活動對環境的重大影響

本集團的業務並無對環境及天然資源造成任何重大不利影響。本集團持續監控其廢氣排放、污水排放及噪音水平，以確保對周邊環境的影響降至最低，並為僱員營造健康環境。本集團並無接獲周邊社區對空氣污染、氣味、噪音或夜間光污染的任何投訴。

## A4. 氣候變化

氣候變化是全球均面對的挑戰，為各個業界的企業帶來重大風險和機遇。儘管本集團迄今尚未受到氣候風險的重大影響，但本集團意識到氣候實體及過渡風險可能對其營運及盈利能力產生的潛在影響。因此，本集團已識別相關氣候風險及機遇，評估其潛在財務影響並制定相應的管理方法。今年，本集團已邁出第一步，披露其氣候相關資料，以符合四個核心要素，即TCFD框架的管治、策略、風險管理以及指標和目標。



## A4. Climate Change (Continued)

### Governance

As part of the Group's governance framework, IC Review is conducted every six months to enhance risk management of the Group. Any findings from the IC Reviews are discussed with the management to identify ESG-related risks and opportunities, including climate risks and opportunities. Details of the Board's oversight of climate-related risks and opportunities are discussed in the section "The Board Statement – Risk Management" of this ESG report.

### Strategy

In terms of climate-related risks, the Group has identified relevant climate-related risks and assessed their potential financial impacts. The climate risks identified, their time horizon, trend, and the potential financial impacts affecting the Group are shown below.

## A4. 氣候變化(續)

### 管治

作為本集團管治框架的一部分，內部監控檢討每六個月進行一次，以加強本集團的風險管理。內部監控檢討的任何結果將與管理層討論，以識別環境、社會及管治相關風險及機遇，包括氣候風險及機遇。董事會監督氣候相關風險及機遇的詳情於本環境、社會及管治報告「董事會聲明－風險管理」一節討論。

### 策略

就氣候相關風險而言，本集團已識別相關氣候相關風險並評估其潛在財務影響。已識別的氣候風險、其時間範圍、趨勢及影響本集團的潛在財務影響列示如下。





## A4. Climate Change (Continued)

## A4. 氣候變化(續)

### Strategy (Continued)

### 策略(續)

	Climate Risks 氣候風險	Time horizon 時間範圍	Trend 趨勢	Potential financial impact 潛在財務影響
<b>Physical Risks</b> 實體風險	Acute	Long term	Increase	Extreme weather events such as cyclones, hurricanes or floods can disrupt the Group's supply chain, damage its assets and affect the operations of its retailing and wholesale businesses. Power outages can disrupt the Groups' digital marketing businesses.
	急性	長期	增加	颱風、颶風或水災等極端天氣事件可阻礙本集團的供應鏈、損害其資產及影響其零售與批發業務的營運。停電可干擾本集團的數碼化市場推廣業務。
	Chronic	Short term	Increase	Rising sea levels and increasing frequency of extreme weather events can pose a long-term threat to the Group's assets. Water scarcity and drought can also affect availability and price of raw materials, such as paper, which could impact on the traditional publishing and IPs licensing businesses.
	慢性	短期	增加	海平面上升及極端天氣事件頻發，均可能對本集團的資產構成長期威脅。水資源短缺及乾旱亦可能影響原材料(如紙張)的供應及價格，從而可能影響傳統出版及知識產權授權業務。





## A4. Climate Change (Continued)

### Strategy (Continued)

	Climate Risks 氣候風險	Time horizon 時間範圍	Trend 趨勢	Potential financial impact 潛在財務影響
<b>Transition Risks</b> 過渡風險	Policy and Legal	Long term	Increase	Increasing regulatory requirements related to climate change such as emissions regulations could increase the Group's operating costs and its profitability. These also impact the market demand for the Group's products and services.
	政策及法律	長期	增加	與氣候變化有關的監管規定(如排放法規)日益增加,可能會增加本集團的經營成本及其盈利能力。該等因素亦影響市場對本集團產品及服務的需求。
	Market	Short term	Increase	Increasing competition from companies that possess more sustainable business models and practices could impact the Group's market share and profitability. Also, changes in consumer preferences towards more sustainable products and services could impact the demand for the Group's products and services.
	市場	短期	增加	可持續商業模式及常規更為豐富公司之間的競爭日益激烈,可能會影響本集團的市場份額及盈利能力。此外,消費者對更可持續產品及服務的偏好變化可能會影響對本集團產品及服務的需求。
	Reputation	Long term	Increase	Lack of actions by the Group in addressing climate change and sustainability issues may result in reputational risks, potentially harming the Group's brand image and customer loyalty.
	聲譽	長期	增加	本集團應對氣候變化及可持續發展問題的行動不足可能造成聲譽風險,可能損害本集團的品牌形象及客戶忠誠度。

## A4. 氣候變化(續)

### 策略(續)

## A4. Climate Change (Continued)

### Strategy (Continued)

The Group regards technology as a potential opportunity for its business development in the face of climate risks. Information digitalisation presents several environmental benefits, such as reducing the consumption of resources like forest products, increasing supply chain efficiency, and encouraging consumers to purchase based on their needs. The Group anticipates that its digital marketing business, coupled with AI technologies, will continue to generate environmental and social benefits in the future, while achieving commercial success and maintaining profitability. This approach aims to strike a balance between protecting the environment and creating social value.

### Risk Management

An ESG risk assessment was conducted based on assessing the possibility and impact of each identified risk into three levels: high, medium and low. The overall risk levels are then classified into the risk levels, high, medium and low based on the possibility and impact ratings. The overall risk level was then prioritised by the Group.

## A4. 氣候變化(續)

### 策略(續)

面對氣候風險，本集團視科技為業務發展的潛在機遇。資訊數碼化帶來多項環保效益，例如減少消耗森林產品等資源、提高供應鏈效率及鼓勵消費者按其需要進行採購。本集團預期其數碼化市場推廣業務連同人工智能技術將於未來繼續產生環境及社會效益，同時實現商業成功及維持盈利能力。此方法旨在於保護環境與創造社會價值之間取得平衡。

### 風險管理

環境、社會及管治風險評估乃根據每項已識別風險的可能性及影響評估，分為三個等級：高、中及低。然後根據可能性及影響評級將整體風險水平分為高、中及低風險水平。本集團隨後將整體風險水平排列優先次序。



## A4. Climate Change (Continued)

### Strategy (Continued)

### Risk Management (Continued)

#### Risk levels

風險等級

#### Definition of the overall risk levels

整體風險等級的定義

#### High

高

Risks at this level may have serious consequences. It is highly likely that there will be some impacts to the Group and hindrance for the Group to achieve strategic goals.

此級別的風險可能造成嚴重後果，很可能會對本集團造成一定影響，阻礙本集團實現策略目標。

#### Medium

中

Risks at this level may have serious consequences, but they are less likely to occur. Conversely, the consequences could be minor in nature, but the probability of occurrence is higher

此級別的風險可能會造成嚴重後果，但發生的可能性較低。相反，後果可能屬輕微，但發生的可能性較高。

#### Low

低

Risks at this level have limited harm and consequences for the Group to achieve its strategic goals, and the probability of occurrence is low.

此級別的風險對本集團實現其策略目標的危害及後果有限，且發生的可能性較低。

The Group has identified its risk profile based on the climate-related risks suggested by the TCFD Framework. The relevant climate risks and the overall risk level results are shown below.

## A4. 氣候變化 (續)

### 策略 (續)

### 風險管理 (續)

#### Risk levels

風險等級

#### High

高

Risks at this level may have serious consequences. It is highly likely that there will be some impacts to the Group and hindrance for the Group to achieve strategic goals.

此級別的風險可能造成嚴重後果，很可能會對本集團造成一定影響，阻礙本集團實現策略目標。

#### Medium

中

Risks at this level may have serious consequences, but they are less likely to occur. Conversely, the consequences could be minor in nature, but the probability of occurrence is higher

此級別的風險可能會造成嚴重後果，但發生的可能性較低。相反，後果可能屬輕微，但發生的可能性較高。

#### Low

低

Risks at this level have limited harm and consequences for the Group to achieve its strategic goals, and the probability of occurrence is low.

此級別的風險對本集團實現其策略目標的危害及後果有限，且發生的可能性較低。

本集團已根據TCFD框架建議的氣候相關風險識別其風險狀況。相關氣候風險及整體風險等級結果列示如下。

### Physical Risks

實體風險

### Transition Risks

過渡風險

#### Risk Type

風險類型

#### Overall Risk Level

整體風險等級

#### Risk Type

風險類型

#### Overall Risk Level

整體風險等級

#### Acute

急性

High

高

#### Policy and Legal

政策及法律

Medium

中

#### Chronic

慢性

Low

低

#### Market

市場

Medium

中

#### Reputation

聲譽

Low

低

## A4. Climate Change (Continued)

### Strategy (Continued)

#### Risk Management (Continued)

The Group has identified acute physical risks as a relatively higher risk to its operations. To ensure employee safety, the Group will review existing measures to cope with adverse weather conditions. Although the Group has not yet established climate change policies, it will continuously monitor climate change risks, stay abreast of the latest laws and regulations, and enhance energy-saving and carbon-reduction measures. The Group will also collaborate with stakeholders to build long-term climate resilience.

#### Metrics and Targets

To measure the level and impact of the Group's climate-related risks, the Group monitors metrics and indicators to ensure an effective and quantitative assessment. The Group regularly monitors and reviews the following aspects and their corresponding indicators. The Group has also set targets on reducing GHG emissions and energy consumption as detailed in the sections "A1.5 Emissions Mitigation Measures and Targets" and "A2.3 Energy Use Efficiency Initiatives and Targets" of this report.

## A4. 氣候變化(續)

### 策略(續)

#### 風險管理(續)

本集團已識別急性實體風險為相對較高的營運風險。為確保僱員安全，本集團將檢討現有措施以應對惡劣天氣狀況。儘管本集團尚未制定氣候變化政策，但本集團將持續監察氣候變化風險，緊貼最新法律法規，並加強節能減碳措施。本集團亦將與持份者合作，建立長期的氣候復原力。

#### 指標及目標

為計量本集團氣候相關風險的等級及影響，本集團監察指標及目標，確保有效及量化評估。本集團定期監察及檢討以下方面及其相應目標。本集團亦已制定減少溫室氣體排放及能源消耗的目標，詳情載於本報告「A1.5減排措施及目標」及「A2.3節約能源措施及目標」各節。





**A4. Climate Change (Continued)**

*Strategy (Continued)*

*Metrics and Targets (Continued)*

**Aspects**

方面

**Indicators**

目標

**Carbon emissions**

碳排放

Scope 1, Scope 2, Scope 3 GHG emissions (in tCO<sub>2eq</sub>), total GHG emissions (in tCO<sub>2eq</sub>) and the GHG emission intensity (in (in tCO<sub>2eq</sub>/m<sup>2</sup>) as shown in the section “A1.2 Greenhouse Gas Emissions” of this ESG report

誠如本環境、社會及管治報告「A1.2溫室氣體排放」一節所示，範圍1、範圍2、範圍3溫室氣體排放（噸二氧化碳當量）、溫室氣體排放總量（噸二氧化碳當量）及溫室氣體排放密度（噸二氧化碳當量／平方米）

**Energy and resources utilisation**

能源及資源使用

Energy consumption (in MWh) and its intensities (in MWh/employee) as shown in the section “A2.1 Energy Consumption” of this report

本報告「A2.1能源耗量」一節所示的能源耗量（兆瓦時）及其密度（兆瓦時／僱員）





## 1. Employment and Labour Practices

### B1. Employment

The Group stringently complies with the national and local laws and regulations concerning employment and labour practices, including but not limited to the followings:

- The Employment Ordinance of Hong Kong;
- The Sex Discrimination Ordinance of Hong Kong;
- The Disability Discrimination Ordinance of Hong Kong;
- The Race Discrimination Ordinance of Hong Kong;
- Labour Law of the PRC;
- Labour Contract Law of the PRC;
- Law of the PRC on the Protection of Rights and Interests of Women;
- Law of the PRC on the Protection of Minors;
- Law of the PRC on the Protection of Disabled Persons; and
- Social insurance Law of the PRC.

## 1. 僱傭及勞工常規

### B1. 僱傭

本集團嚴格遵守有關僱傭及勞工常規的國家及本地法律及法規，包括但不限於以下各項：

- 香港僱傭條例；
- 香港性別歧視條例；
- 香港殘疾歧視條例；
- 香港種族歧視條例；
- 中國勞動法；
- 中國勞動合同法；
- 中國婦女權益保障法；
- 中國未成年人保護法；
- 中國殘疾人保障法；及
- 中國社會保險法。



## 1. Employment and Labour Practices *(Continued)*

### B1. Employment *(Continued)*

No non-compliance with relevant laws and regulations that have a significant impact on the Group relating to compensation and dismissal, recruitment and promotion, working hours, rest periods, equal opportunity, diversity, anti-discrimination, and other benefits and welfare had been identified during the Reporting Period.

The Employee's Handbook continues to serve as the guideline and working procedure to manage employment and labour-related practices. During the Reporting Period, there were no major changes in policies relating to compensation and dismissal, recruitment and promotion, working hours, rest periods, equal opportunities, diversity and anti-discrimination.

## 1. 僱傭及勞工常規 (續)

### B1. 僱傭 (續)

於報告期間，並無發現違反有關補償及解僱、招聘及晉升、工時、假期、平等機會、多元化、反歧視以及其他福利且對本集團有重大影響的相關法律法規。

員工手冊繼續作為管理僱傭及與勞工相關常規的指引及工作流程。於報告期間，概無就有關補償及解僱、招聘及晉升、工時、假期、平等機會、多元化以及反歧視政策作重大變更。



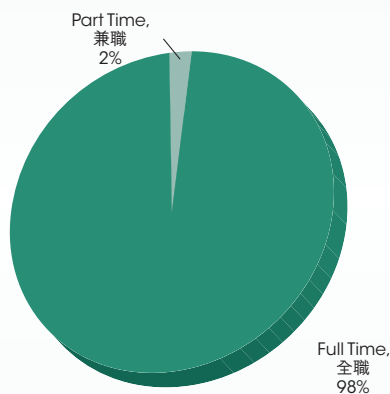
## 1. Employment and Labour Practices (Continued)

### B1. Employment (Continued)

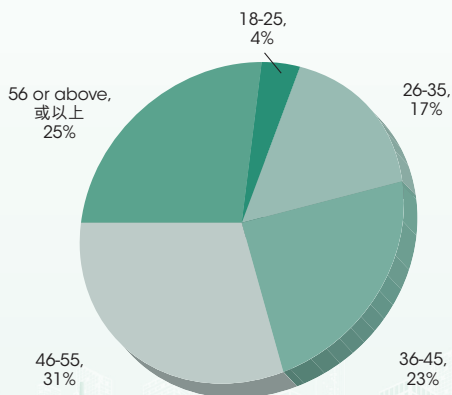
#### Workforce

At the end of the Reporting Period, the Group had a total of 52 employees. The figures below present the workforce distribution by employment type, gender, age group, employment category and geographical region.

**Workforce Distribution by Employment Type**  
按僱傭類別劃分的僱員分佈



**Workforce Distribution by Age Group**  
按年齡組別劃分的僱員分佈



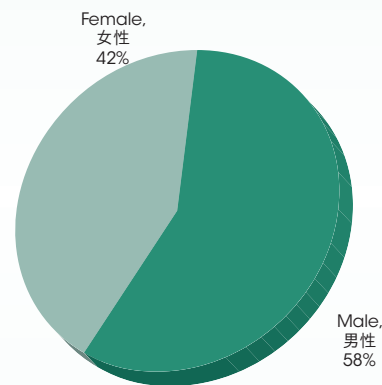
## 1. 僱傭及勞工常規 (續)

### B1. 僱傭 (續)

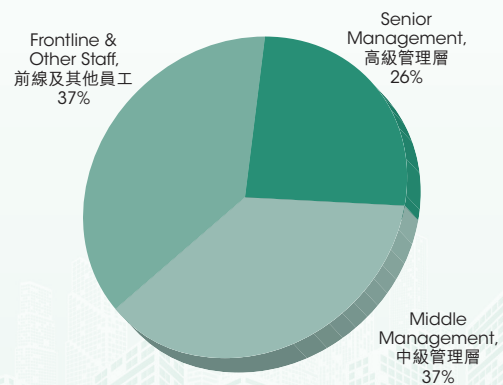
#### 僱員

於報告期末，本集團共有52名僱員。以下數字呈列按僱傭類型、性別、年齡組別、僱傭類別及地區劃分的僱員分佈。

**Workforce Distribution by Gender**  
按性別劃分的僱員分佈



**Workforce Distribution by Employment Category**  
按僱傭類別劃分的僱員分佈





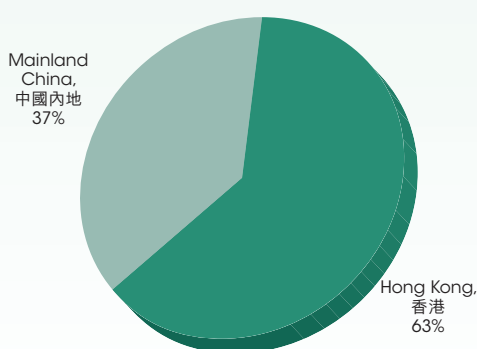


## 1. Employment and Labour Practices (Continued)

### B1. Employment (Continued)

#### Workforce (Continued)

**Workforce Distribution by Geographical Region**  
按地區劃分的僱員分佈



#### Staff Turnover

The annual average turnover rate during the Reporting Period was 49%<sup>2</sup>, turnover rates by categories are shown in the graph below. The turnover rates during the Reporting Period were relatively high due to the restructuring of the Group's business operations triggered by the COVID-19 crash.

## 1. 僱傭及勞工常規 (續)

### B1. 僱傭 (續)

#### 僱員 (續)

#### 員工流失率

報告期間的年度平均流失率為49%<sup>2</sup>，按類別劃分的流失率如下圖所示。報告期間的流失率相對較高，乃由於2019冠狀病毒病的打擊觸發本集團業務營運重組所致。

<sup>2</sup> The annual average turnover rate was calculated by the total number of employees who left the Group during the Reporting Period/(total number of employees as of March 31 of the Reporting Period plus the total number of employees who left the Group during the Reporting Period)\*100%.

<sup>2</sup> 年度平均流失率乃按於報告期間離開本集團的僱員總數/(於報告期間三月三十一日的僱員總數加報告期間內離開本集團的僱員總數)\*100%計算。

## 1. Employment and Labour Practices (Continued)

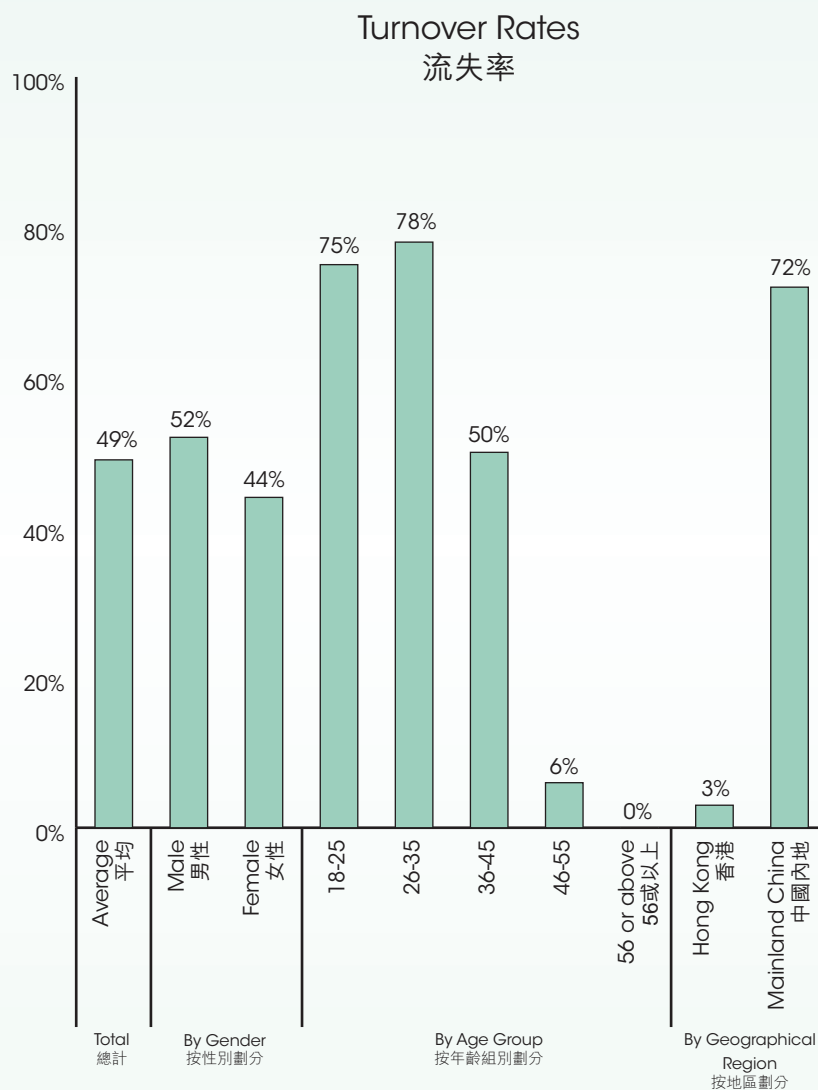
### B1. Employment (Continued)

#### Staff Turnover (Continued)

## 1. 僱傭及勞工常規 (續)

### B1. 僱傭 (續)

#### 員工流失率 (續)



Note: The turnover rate by specific category was calculated by the total number of employees who left the Group in the specific category during the Reporting Period / (total number of employees in the specific category as of March 31 of the Reporting Period plus the total number of employees in the specific category who left the Group during the Reporting Period) \* 100%.

附註：按特定類別劃分的流失率乃按於報告期間在特定類別中離開本集團的僱員總數 / (於報告期間三月三十一日在特定類別中的僱員總數加上於報告期間內離開本集團的特定類別員工總數) \* 100%計算。



## 1. Employment and Labour Practices (Continued)

### B1. Employment (Continued)

#### *Compensation, Allowance, and Benefits*

Apart from stringently following applicable laws and regulations, the Group strives to adopt the best industrial practices by providing various benefits to employees. For example, all employees are covered under the Group's medical scheme. Employees' compensation insurance is also provided to employees upon completion of probation, and employees are subject to personal accident insurance. Other benefits include a dental scheme, retirement benefit, staff discount, welfare fund, long service award, and examination leave.

During the Reporting Period, the self-development course can be reimbursed based on the employee's grading.

The Group offers various compensation and allowance including compensation leave, meal allowance, travelling allowance, discretionary bonus, housing allowance and standby allowance. The Group's welfare fund supports departments to organise recreational, social and other celebratory activities to enrich employees' leisure life and enhance their team spirit.

## 1. 僱傭及勞工常規 (續)

### B1. 僱傭 (續)

#### *補償、津貼及待遇*

除嚴格遵守適用法律及法規外，本集團致力採納最佳行業慣例，為僱員提供各種福利。例如，全體僱員均受本集團醫療計劃保障。僱員於試用期結束後亦可獲提供僱員賠償保險，及可享個人意外保險保障。其他待遇包括牙科計劃、退休福利、員工折扣、福利基金、長期服務獎勵及考試假期。

於報告期間，自我發展課程可根據僱員的級別報銷。

本集團提供多項補償及津貼，包括補假、膳食津貼、交通津貼、酌情花紅、房屋津貼及候命津貼。本集團的福利基金支援部門舉辦康樂、社交及其他慶祝活動，從而豐富僱員休閒生活及增強團隊精神。

## 1. Employment and Labour Practices (Continued)

### B1. Employment (Continued)

#### Recruitment and Dismissal

The recruitment procedure is guided by relevant laws and regulations such as the Labour Law of the PRC and the Employment Ordinance of Hong Kong. Policies on employment have been stated clearly in the Employee's Handbook. Recruitment of new employees is based on objective criteria including professional qualifications and skill sets needed for the positions.

Termination of the employment contract shall be made in writing by either party. An employee may be summarily dismissed without advance notice or payment in lieu of notice if the employee in relation to his/her employment, 1) willfully disobeys a lawful and reasonable order; or 2) misconducts himself/herself; or 3) is guilty of fraud or dishonesty; or 4) habitually neglects his/her duties; or 5) on any other grounds on which the Group would be entitled to terminate the contract of employment.

## 1. 僱傭及勞工常規 (續)

### B1. 僱傭 (續)

#### 招聘及解僱

招聘程序以相關法律及法規作指引，例如中國勞動法和香港僱傭條例。僱傭政策清晰列明於員工手冊內。本集團根據客觀標準招聘新僱員，當中包括職位所需的專業資格及技能組合。

終止僱傭合約應由任何一方以書面形式提出。倘僱員在與其僱傭有關的事宜上：1) 故意違反合法合理的命令；或2) 行為失當；或3) 犯有欺詐或不誠實行為；或4) 慣常疏忽職責；或5) 本集團因任何其他理由而有權終止合約，僱員可於並無事先通知或獲代通知金的情況下即時被解僱。





## 1. Employment and Labour Practices (Continued)

### B1. Employment (Continued)

#### *Evaluation and Appraisal System*

Performance appraisal is conducted annually. The Group encourages the management to communicate with their teammates regularly and provide constructive feedback on their career paths. Together with the professional skills training delivered by business experts, the Group hopes to improve the soft skills and competitiveness of its employees through positive and mutual communications and comprehensive training. Employees are promoted based on their performance and the extent to which they demonstrate the ability required for a higher grade.

#### *Equal Opportunity*

To achieve diversity and cohesiveness within the Group, maintaining a working environment free from harassment and bullying where every employee feels respected is a top primacy to keep the employee staying away from worries and imposing their potential.

## 1. 僱傭及勞工常規 (續)

### B1. 僱傭 (續)

#### *評估及評核系統*

本集團每年進行表現評估。本集團鼓勵管理層定期與其團隊成員溝通，並就彼等的職業路向提供建設性反饋。連同由業務專家提供的專業技能培訓，本集團希望透過積極及雙向的溝通及全面的培訓，提高僱員的軟技能及競爭力。僱員的晉升乃基於彼等的表現及彼等可展示更高職級所需能力的程度。

#### *平等機會*

為實現本集團內部的多元性及凝聚力，本集團的首要考慮是維持一個並無騷擾及欺凌的工作環境，讓每位僱員感到備受尊重，安心工作，發揮潛能。

## 1. Employment and Labour Practices (Continued)

### B1. Employment (Continued)

#### Equal Opportunity (Continued)

The Group has established the Policy on Equal Employment Opportunities. Equal opportunities are offered to candidates and employees during recruitment, internal transfer and promotion, on the grounds of gender equality, nationality, marital status, disability and religious belief. Any employee is entitled to the same benefits and equal treatment. The Group takes a zero-tolerance policy against any intimidating, hostile, degrading, humiliating, or offensive actions and behaviours, no matter physical or verbal, with or without the abuse of power or position. Any harassment or bullying is strictly prohibited and is treated as misconduct, which may result in warranting dismissal. Anyone filing a complaint or assisting in an investigation shall be protected from intimidation, victimization, or discrimination. Retaliating against an employee for complaining about harassment or bullying is a disciplinary offence.

## 1. 僱傭及勞工常規 (續)

### B1. 僱傭 (續)

#### 平等機會 (續)

本集團已制定平等僱傭機會政策。不論候選人及僱員的性別、國籍、婚姻狀況、殘疾及宗教信仰，彼等在聘用、內部調任及晉升過程均享有平等機會。任何僱員均有權享有相同福利及同等待遇。本集團對任何恐嚇、敵意、侮辱、羞辱或冒犯的行動及行為（不論身體上或口頭上，或有否濫用職權或職位）採取零容忍政策。本集團嚴禁任何騷擾或欺凌行為，並視之為不當行為，可能導致解僱。任何提交投訴或協助調查的人士將受到保護，免受恐嚇、侵害或歧視。因騷擾或欺凌投訴而對僱員作出報復屬違紀行為。



## 1. Employment and Labour Practices (Continued)

### B1. Employment (Continued)

#### Employee Communication

The Group strives to nurture a sense of belonging in the workplace. The Group regularly organises employee engagement gatherings to strengthen the harmonious relationships among employees. Activities such as themed birthday parties and celebrations for New Year, Chinese New Year and Christmas are organised. Coupons for festive food such as mooncakes or turnip cakes are also distributed to employees occasionally. Employees' input is valuable to the Group's development. The Group fosters communication, promotes cooperation and strives to achieve mutual understanding along all levels of staff.

### B2. Employee Health and Safety

Workplace safety is the Group's high priority. The Group strictly complies with all applicable laws and regulations in relation to occupational health and safety ("OHS"), including but not limited to the Law of the PRC on the Prevention and Control of Occupational Diseases, the Occupational Safety & Health Ordinance of Hong Kong, and Employees' Compensation Ordinance of Hong Kong. The internal Health & Safety Policy guides the daily OHS management, including workplace safety, fire safety, adverse weather arrangement, etc.

## 1. 僱傭及勞工常規 (續)

### B1. 僱傭 (續)

#### 僱員溝通

本集團致力在工作場所培養歸屬感。本集團定期組織員工參與聚會，以加強員工之間的和諧關係。本集團舉辦主題生日會以及新年、農曆新年及聖誕節慶祝活動。我們亦不時向僱員派發月餅或蘿蔔糕等節日食品的優惠券。僱員的投入對本集團的發展至關重要。本集團促進溝通及合作，並致力實現各級員工之間互相理解。

### B2. 僱員的健康與安全

工作場所安全對本集團至為重要。本集團嚴格遵守有關職業健康與安全(「職安健」)的所有適用法律及法規，包括但不限於中國職業病防治法、香港職業安全及健康條例以及香港僱員補償條例。內部健康與安全政策為日常職安健管理提供指引，包括工作場所安全、消防安全及惡劣天氣安排等。

## 1. Employment and Labour Practices (Continued)

### B2. Employee Health and Safety (Continued)

The Group has included guidelines for working in the office during the outbreak of Coronavirus disease 2019 (COVID-19) in the Safety and Health Handbook. Measures include but are not limited to stopping unnecessary business travel and visit, maintaining good ventilation, checking body temperature, and wearing masks.

The Safety and Health Handbook also states policies and rules for occupational safety and health in the offices, management of passageways, electrical appliances and dangerous materials, and measures for an emergency. The management of the Group must ensure all employees are familiar with and observe all the safety rules to guarantee the work safety of employees. Each employee should observe the importance of workplace safety to protect themselves from unnecessary accidents and injuries.

Ergonomic office furniture has been provided to employees for maximum comfort and fatigue reduction, reducing the risks of suffering from Musculoskeletal Disorders while performing their duties.

## 1. 僱傭及勞工常規 (續)

### B2. 僱員的健康與安全 (續)

本集團已在安全與健康手冊收錄於2019冠狀病毒病爆發期間在辦公室工作的指引。有關措施包括但不限於停止不必要商務差旅及探訪、保持空氣流通、體溫檢查及配戴口罩。

安全與健康手冊亦載列有關辦公室職業安全與健康、對安全通道、電器用品及危險物料的管理以及緊急措施的政策及規則。本集團管理層必須確保全體僱員熟知並遵守所有安全規則，以保障僱員的工作安全。每名僱員應注意工作場所安全的重要性，以保障自身免受不必要事故及傷害。

我們向僱員提供符合人體工學的辦公傢俱，以為彼等帶來最大程度的舒適度，同時減少工作疲勞，並減低工作時患上肌肉骨骼疾病的風險。





## 1. Employment and Labour Practices *(Continued)*

### B2. Employee Health and Safety *(Continued)*

No work-related fatality or injury cases had been reported in the past three years including during the Reporting Period. No non-compliance with relevant laws and regulations that have a significant impact on the Group relating to providing a safe working environment and protecting employees from occupational hazards had been identified during the Reporting Period.

#### *Measures for the COVID-19 Pandemic*

Ensuring workplace health and safety during the health crisis of COVID-19 is the Group's high priority. The Group has implemented preventive measures including:

- adoption of flexible work arrangements;
- mandatory use of masks in the workplace;
- daily monitoring of body temperature; and
- adoption of video conferencing whenever possible.

## 1. 僱傭及勞工常規 (續)

### B2. 僱員的健康與安全 (續)

於過去三年(包括報告期間)，概無與工作相關的死亡或受傷報告。於報告期間，概無發現違反有關提供安全工作環境及保障僱員免受職業危害且對本集團有重大影響的相關法律及法規。

#### *2019冠狀病毒病疫症措施*

在2019冠狀病毒病的健康危機中確保工作場所的健康及安全乃本集團的首要任務。本集團已實施預防措施，包括：

- 採納彈性工作安排；
- 在工作場所強制使用口罩；
- 每日監測體溫；及
- 盡可能採用視像會議。

## 1. Employment and Labour Practices (Continued)

### B2. Employee Health and Safety (Continued)

#### Measures for the COVID-19 Pandemic (Continued)

If any employee is subject to medical surveillance or quarantine, the Group will grant statutory sick leave in accordance with the Employment Ordinance of the Laws of Hong Kong. The Group will follow the guidelines provided by the Labour Department of Hong Kong for the salary arrangements if appropriate. Financial support will be arranged and decided by the management if appropriate.

### B3. Development and Training

The Group has established the Training & Development policy, specifying training policies, new employee orientation, education allowance and professional training. A wide range of training courses have been provided to employees of all levels. For instance, all new employees attend an orientation program within the first week of employment. The program provides information on the followings:

- the organisation structure and mission of the Group;
- the employee's role in contributing to business success and objectives;

## 1. 僱傭及勞工常規 (續)

### B2. 僱員的健康與安全 (續)

#### 2019冠狀病毒病疫症措施 (續)

倘任何僱員須接受醫學監察或隔離，本集團將根據香港法例項下的僱傭條例授出法定病假。本集團將遵循香港勞工處就薪金安排提供的指引（如適用）。管理層將安排及決定財務支援（如適用）。

### B3. 發展及培訓

本集團已制定培訓及發展政策，當中訂明培訓政策、新僱員入職培訓、教育津貼及專業培訓。本集團為各級僱員提供廣泛培訓課程。例如，所有新僱員於受聘首週內均須參加入職培訓計劃。該計劃提供以下資料：

- 本集團的組織架構及使命；
- 僱員於促進業務成功及目標方面的角色；



## 1. Employment and Labour Practices (Continued)

### B3. Development and Training (Continued)

- different departments of the Group, through a guided tour around the office;
- the collaboration between various departments; and
- office procedures.

The Group also provides its directors and senior management with training and updates to maintain continuing professional development and enhance their knowledge and skills. The training and updates include regular updates on rules for listed companies, training on relevant laws and regulations, corporate governance, inside information, anti-corruption and bribery, internet risk and international accounting standards as well as risk management accountability for directors. Identification of training needs and evaluation of their effectiveness are carried out by regularly reviewing employees' performance and competence and referring to requirements of relevant rules and regulations.

## 1. 僱傭及勞工常規 (續)

### B3. 發展及培訓 (續)

- 透過辦公室導覽參觀本集團不同部門；
- 各部門之間的合作；及
- 辦公室程序。

本集團亦向其董事及高級管理層提供培訓及更新內容，助其保持持續專業發展並提升其知識及技能。培訓及更新內容包括上市公司規例的定期更新、有關相關法律及法規、企業管治、內幕消息、反貪污及賄賂、網絡風險及國際會計準則的培訓以及董事風險管理責任。我們會定期檢討僱員的表現及能力，並參考相關規例及法規的規定，以識別培訓需要及評估其成效。

## 1. Employment and Labour Practices (Continued)

### B3. Development and Training (Continued)

The Group encourages the self-development of employees through attending external training programs and seminars. They are encouraged to join seminars promoted by professional firms. Topics of seminars include risk management, Internal control, money laundering and IP management. Permanent employees who have completed one year of service can apply for the sponsorship of external training programs relevant to their jobs. Prior approval from their department heads is required and employees are eligible for reimbursement of program fees upon their completion of the related courses with passing grades or satisfactory attendance.

To ensure employees' awareness of sustainability, the human resources department of the Group provides training to new staff regarding the latest ESG-related policies listed in the employee handbook of the Group. Further training will also be provided to employees when the ESG-related policies are updated.

## 1. 僱傭及勞工常規 (續)

### B3. 發展及培訓 (續)

本集團鼓勵員工透過參加外部培訓課程及研討會實現自我發展。本集團鼓勵員工參加由專業公司推行的研討會。研討會主題包括風險管理、內部監控、洗黑錢及知識產權管理。服務滿一年的正式僱員可就與其工作相關的外部培訓計劃申請資助，惟須事先獲其部門主管批准。倘僱員完成相關課程並考獲合格成績或出席率令人滿意，則可報銷課程費用。

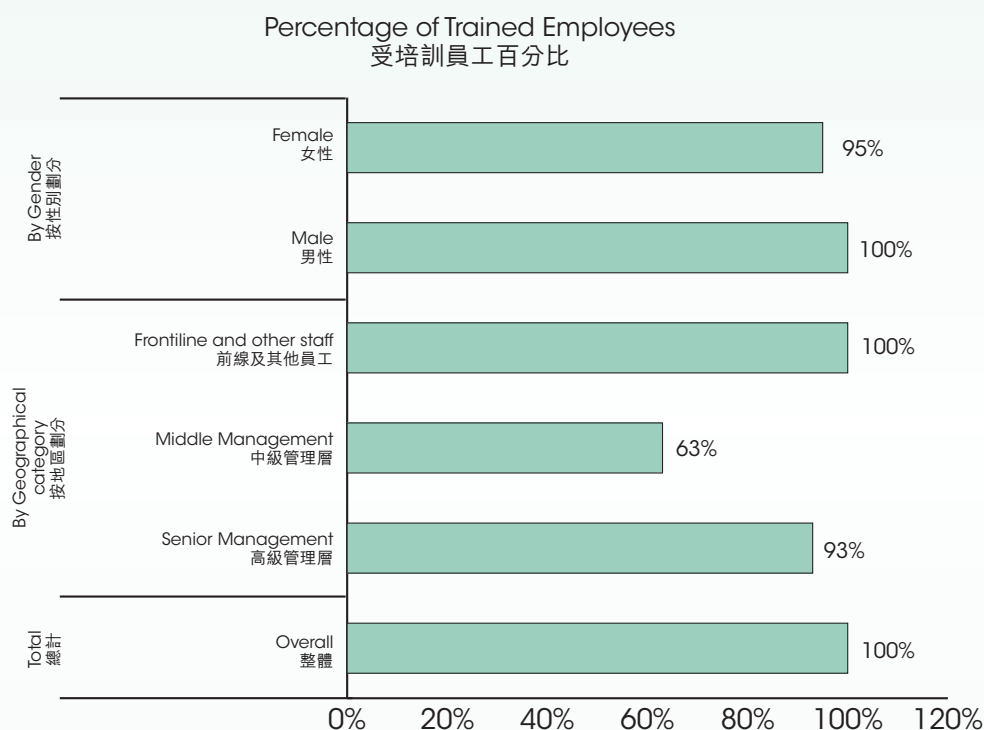
為確保僱員對可持續發展的意識，本集團的人力資源部向新員工提供在員工手冊中列明本集團最新環境、社會及管治有關政策的培訓。當環境、社會及管治有關政策更新時，本集團亦會向僱員提供進一步培訓。



## 1. Employment and Labour Practices (Continued)

### B3. Development and Training (Continued)

The percentage of trained employees and training hours per employee are shown in the graphs below<sup>3,4</sup>.



## 1. 僱傭及勞工常規 (續)

### B3. 發展及培訓 (續)

受訓僱員百分比及每名僱員的培訓時數如下圖所示<sup>3,4</sup>。

<sup>3</sup> The percentage of trained employees was calculated by the number of trained employees in the specific category/the number of employees in the specific category as of 31 March of the Reporting Period \* 100%

<sup>4</sup> The overall percentage of trained employees, percentage of trained frontline and other staff, and percentage of trained male employees were >100% according to the calculation (108%, 163% and 117% respectively) since trained employees who left the Group during the Reporting Period were included. The percentage of trained frontline and other staff was presented as 100% in the graph since all existing staff has been trained during the Reporting Period.

<sup>3</sup> 受培訓員工百分比按特定類別的受培訓員工人數／截至三月三十一日報告期間特定類別的員工人數 \* 100% 計算。

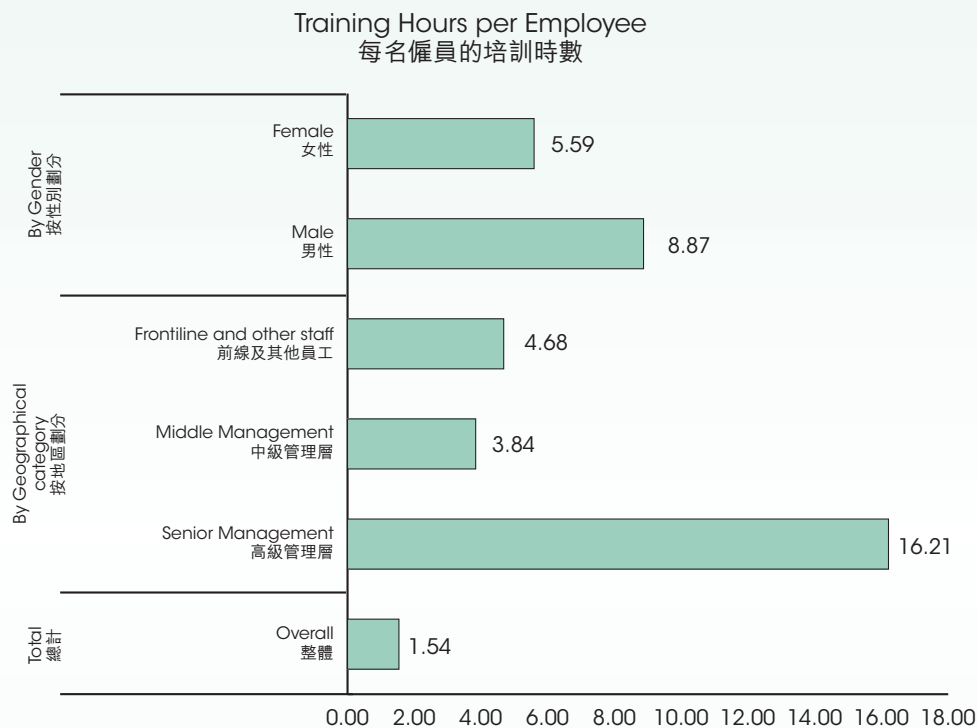
<sup>4</sup> 根據計算所得，受培訓員工的整體百分比、前線及其他員工的受培訓百分比及男性員工受培訓百分比大於 100% (分別為 108%、163% 及 117%)，乃由於已計入於報告期間離開本集團的受培訓員工。由於所有現有員工於報告期間已接受培訓，因此受培訓前線及其他員工的百分比於圖表中呈列為 100%。

## 1. Employment and Labour Practices (Continued)

### B3. Development and Training (Continued)

## 1. 僱傭及勞工常規 (續)

### B3. 發展及培訓 (續)



### B4. Labour Standards

The Group has established the Guide to Avoid Child and Forced Labour, stating the definition of child and forced labour, and measures to prevent and eliminate non-compliance. The Human Resources Department continues to implement a comprehensive checking system during the recruitment process to ensure compliance with all the applicable laws regarding employment and labour standards, such as the Employment Ordinance of the Laws of Hong Kong and Provisions on the Prohibition of Using Child Labour of the PRC.

### B4. 勞工準則

本集團已制定「防止童工及強迫勞動指引」，列明童工及強迫勞動的定義以及防止及消除不合規情況的措施。於招聘過程中，人力資源部繼續實施全面檢查制度，以確保遵守有關僱傭及勞工準則的所有適用法律，例如香港法例項下的僱傭條例及中國禁止使用童工規定。



## 1. Employment and Labour Practices (Continued)

### B4. Labour Standards (Continued)

The Group prohibits unauthorised overtime work. The number of working hours is clearly stated in the Employee's Handbook. Employees working overtime must get prior approval from line managers and they are eligible for compensation leave.

The Group strictly forbids any forms of workplace harassment. Upon finding or encountering any suspicious actions, employees can make a complaint to the Human Resources Department. The case will be investigated thoroughly and confidentially following the guidelines for handling harassment complaints.

The Group will take appropriate disciplinary action against anyone who is in breach of any applicable laws, regulations, and ordinances. When any child labour or forced labour is discovered, the Group would act immediately to stop the violation and Investigation procedures will be commenced immediately. No non-compliance with relevant laws and regulations relating to preventing child and forced labour had been identified during the Reporting Period.

## 1. 僱傭及勞工常規 (續)

### B4. 勞工準則 (續)

本集團禁止未經授權的超時工作。工作時數已於員工手冊內清晰列明。僱員超時工作須事先獲得直屬經理批准，並可獲補假。

本集團嚴禁任何形式的職場騷擾。倘發現或遇上任何可疑行為，僱員可向人力資源部投訴。有關人員將根據處理職場騷擾投訴指引徹底及保密地調查有關個案。

本集團將對違反任何適用法律、法規及條例的任何人士採取適當紀律處分。倘發現任何童工或強迫勞動，本集團會即時採取行動制止違反情況並立即展開調查程序。於報告期間，概無發現有關防止童工及強迫勞動的相關法律及法規的違反情況。



## 2. Operating Practices

### B5. Supply Chain Management

Supply chain management is of paramount importance when it comes to a sustainable business strategy. To facilitate the shift to a sustainable economy, the Group has established guidance on environmental supply chain management to manage the environmental and social performance of suppliers. The Group conducts dialogue and collaborates with suppliers and sub-contractors on continuous improvements of the environmental performance of products and services to achieve the following missions for both sides:

- Improve business and public image;
- Reduce the risk of legal non-compliance;
- Improve productivity and efficiency;
- Reduce the number of defaults;
- Improve environmental management;
- Prohibit the use of forced and child labour;
- Strengthening anti-corruption; and
- Comply with applicable rules and regulations.

## 2. 營運常規

### B5. 供應鏈管理

供應鏈管理對可持續業務戰略至關重要。為促進向可持續經濟轉型，本集團已設立環境供應鏈管理指引以管理供應商的環境及社會表現。本集團與供應商及分包商就持續改善產品及服務的環境表現進行對話及合作，從而為雙方完成下列任務：

- 提升業務及公共形象；
- 減少違法風險；
- 提高生產力及效率；
- 減少違約數量；
- 提升環境管理；
- 禁止使用強迫勞動及童工；
- 加強反貪污工作；及
- 遵守適用規例及法規。





## 2. Operating Practices (Continued)

### B5. Supply Chain Management (Continued)

To achieve the mission statements effectively, the Group provides guidance and works with its suppliers to:

- Identify sources of pollution and waste, and implement measures to prevent pollution and waste, e.g., the use of renewable raw materials;
- Improve the environmental performance, extending responsibility in the supply chain, e.g. avoiding derivatives and contamination; and
- Use cost-efficient technologies that facilitate cleaner production, pollution prevention and eco-efficient.

## 2. 營運常規 (續)

### B5. 供應鏈管理 (續)

為有效達成任務，本集團提供指引並與供應商合作以：

- 識別污染及廢棄物源頭，並實施措施防止污染及廢棄物，例如使用可再生原材料；
- 改善環境表現，延伸供應鏈中的責任，例如避免產生衍生物及污染；及
- 使用可促進潔淨生產、防止污染及兼具生態效益與成本效益的技術。



## 2. Operating Practices (Continued)

### B5. Supply Chain Management (Continued)

The Group collaborates in priority with suppliers with relevant experience, resources and/or certificates. Apart from compliance with relevant legal requirements, supply stability, quality, reputation, and the ESG performance of potential suppliers are also considered in supplier selection. Quotations are obtained from two to three suppliers in a tendering process. Selected suppliers are required to provide samples for the Group's inspection before signing the agreement. The Group selects local suppliers, especially those within close distance from the Group's offices, to reduce the carbon footprint attributed to good transportation and travelling and to promote local economic development.

The guidance for environmental supply chain management also targets to improve social aspects of suppliers including legal compliance, product/service quality, labour standards, human rights and code of conduct. Environmental performance assessment and due diligence are performed annually by reviewing the supplier's background, including its latest business and compliance status. The guidance for environmental supply chain management helps to minimise environmental and social risks along the Group's supply chain. It is reviewed annually and will be updated if necessary.

## 2. 營運常規 (續)

### B5. 供應鏈管理 (續)

本集團優先與具備相關經驗、資源及／或證書的供應商合作。除遵守相關法律規定外，於甄選供應商時亦會考慮潛在供應商的供應穩定性、質素、聲譽以及環境、社會及管治表現。在招標過程中，我們會從兩至三家供應商取得報價。經選定的供應商須於簽署協議前提供樣本以供本集團檢查。本集團選擇本地供應商，特別是距離本集團辦公室較近的供應商，以減少碳足跡，達致良好運輸及差旅，並促進本地經濟發展。

環境供應鏈管理指引亦旨在改善供應商的社會方面，包括法律合規、產品／服務質量、勞工標準、人權及行為守則。本集團每年透過審查供應商的背景（包括其最新業務及合規狀況）進行環境表現評估及盡職審查。環境供應鏈管理指引有助減低本集團供應鏈的環境及社會風險。其每年進行檢討，並於有需要時更新。

## 2. Operating Practices (Continued)

### B5. Supply Chain Management (Continued)

The Group will take necessary actions, including termination of service, in the situation of serious non-compliance incidents of suppliers. Suppliers with non-compliance regarding respect for human rights, prohibited use of forced or child labour, and anti-corruption and legal compliance will be terminated.

During the Reporting Period, the Group engaged with 103 key suppliers from Hong Kong and Mainland China, providing professional and legal services, advertising, IT support, insurance services, photo shooting, computer rentals and printing services<sup>5</sup>. All suppliers have been selected and assessed according to the above-mentioned procedures.

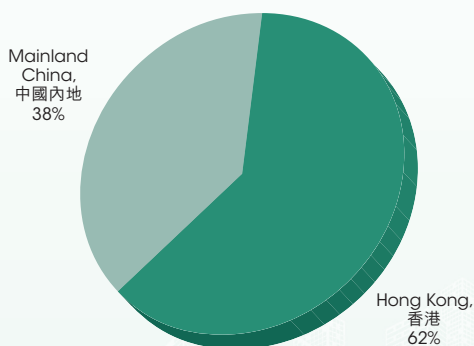
## 2. 營運常規 (續)

### B5. 供應鏈管理 (續)

倘供應商發生嚴重不合規事件，本集團將採取必要行動，包括終止服務。在尊重人權、禁止使用強制勞工或童工以及反貪污及法律合規方面不合規的供應商將被終止合作。

於報告期間，本集團與香港及中國內地的103名主要供應商合作，彼等提供專業及法律服務、廣告、資訊科技支援、保險服務、照片拍攝、電腦租賃及印刷服務<sup>5</sup>。所有供應商均已根據上述程序進行甄選及評估。

**Supplier Distribution by Geographical Region**  
按地區劃分的供應商分佈



<sup>5</sup> The key suppliers of the Group included those which provide support for both the costs of sales and the administration of the Group.

<sup>5</sup> 本集團的主要供應商包括為本集團的銷售成本及行政提供支持的供應商。

## 2. Operating Practices (Continued)

### B6. Product Responsibility

#### *Product Labelling, Health and Safety, and Advertising*

For any marketing and promotional activities, the Group ensures that relevant activities observe applicable laws and regulations such as the Advertisement Law of the PRC. No false nor misleading contents shall be contained in any advertisement. The Operation and Compliance Teams are responsible for the management of relevant activities and compliance with applicable regulations.

During the Reporting Period, the Group had not recorded any cases of material non-compliance with laws and regulations regarding health and safety, advertising, labelling and privacy matters relating to products and services provided.

#### *Quality and Service Assurance*

The Group's Quality Assurance policy requires that comic books and products have to be inspected by the Comics Department before entering into production. A fixed number of samples, including but not limited to products, comic books and manuscripts, are kept in the Group's inventory.

## 2. 營運常規 (續)

### B6. 產品責任

#### *產品標籤、健康及安全以及廣告*

就任何市場營銷及推廣活動而言，本集團確保相關活動遵守適用法律及法規，例如中國廣告法。任何廣告概不得載入錯誤或具誤導性的內容。營運及合規團隊負責管理相關活動及遵守適用法規。

於報告期間內，本集團並無錄得有關涉及所提供產品及服務的健康及安全、廣告、標籤及隱私事項的法律及法規的任何重大違反事件。

#### *品質及服務保證*

本集團的品質保證政策規定，漫畫書籍及產品於進入生產階段前須由漫畫部檢查。本集團存置固定數量的樣本，包括但不限於產品、漫畫書及手稿。





## 2. Operating Practices (Continued)

### B6. Product Responsibility (Continued)

#### Quality and Service Assurance (Continued)

To ensure that products are of high quality, the Group regularly assesses risks associated with its products or services. Risks of the Group's long-cycle projects are assessed monthly while that of its short-cycle projects are assessed weekly. Risk assessments are steered by the project managers and performed in cooperation with the other staff and professionals. The assessment criteria include technical risks, external risks, organisational risks and management risks. Assessment results are categorised by the likelihood of occurrence and severity of consequence so that relative measures can be formulated to address, monitor, and manage the prioritised risks.

The Group strives to provide excellent customer service to clients. If any complaint is reported, the Group will investigate the case and seek a mutually satisfying settlement between the complainant and the Group. During the Reporting Period, the Group has received no product-related or service-related complaints and there were no products recalled related to health and safety reasons.

## 2. 營運常規 (續)

### B6. 產品責任 (續)

#### 品質及服務保證 (續)

為確保產品高質素，本集團定期評估與其產品或服務相關的風險。本集團長週期項目的風險每月評估，而短週期項目的風險則每週評估。風險評估由項目經理指導，並與其他員工及專業人士合作進行。評估標準包括技術風險、外部風險、組織風險及管理風險。評估結果根據發生的可能性及後果的嚴重程度進行分類，以便制定相關措施以應對、監控及管理優先風險。

本集團致力為客戶提供卓越的客戶服務。倘接獲任何投訴，本集團將調查有關個案，並尋求投訴人與本集團之間互相滿意的解決方法。於報告期間，本集團並無接獲有關產品或服務的投訴，亦無因健康及安全理由而召回產品。

## 2. Operating Practices (Continued)

### B6. Product Responsibility (Continued)

#### Intellectual Properties (“IPs”)

The Intellectual Property Policy was rigorously followed during the Reporting Period, and the Group’s designated IPs Team continues to work together with the Secretary and Legal Team to manage IPs rights. The Group has established Intellectual Property Policy and Procedures, presenting procedures of IPs or trademark application and guidelines to protect IP rights. The Group follows similar practices as the previous Reporting Periods relating to the protection of IP rights, the process of IPs authorization and licensing, and any infringement case. The IPs Team conducts routine monitoring and assessments and reports to various departments. Publishing materials, products and productions are only licensed upon verifications of the licensee and upon approval of formal agreements with the Group’s Legal Team.

During the Reporting Period, the Group has established enquiry channels in both its Hong Kong and Zhuhai offices to facilitate the sharing of IPs information across borders and prevent any IPs rights violations by the Group or its customers. This measure aimed at improving the accessibility and ease of obtaining IPs-related information, as well as promoting compliance with IPs laws and regulations.

## 2. 營運常規 (續)

### B6. 產品責任 (續)

#### 知識產權 (「知識產權」)

本集團於報告期間嚴格遵守知識產權政策，而本集團指定的知識產權團隊將繼續與秘書及法律團隊聯手管理知識產權。本集團已制定知識產權政策及程序，列明知識產權或商標申請程序以及保護知識產權指引。本集團就保障知識產權、知識產權許可與授權過程以及任何侵權情況採用與過往報告期間相類似的做法。知識產權團隊進行例行監察及評估，並向多個部門作出報告。出版材料、產品及製作僅於本集團的法律團隊在核證授權及正式協議批准後方獲授權。

於報告期間，本集團已在香港及珠海辦事處設立查詢渠道，促進跨境共享知識產權資料及防止本集團或其客戶侵犯任何知識產權。該措施旨在令知識產權相關資料的獲取更簡易方便，以及促進遵守知識產權法律法規。



## 2. Operating Practices (Continued)

### B6. Product Responsibility (Continued)

#### Intellectual Properties ("IPs") (Continued)

When an infringement of the Group's work is detected, the Group send a cease and desist letter to notify the alleged infringer of its activity and stop the use of the Group's works, goods and services. Legal action will be taken to stop a patent infringer from further producing or selling relevant works, goods and services after seeking legal advice. If infringement occurred overseas, the Group will allocate responsible persons to assist and manage procedures in relation to any legal actions in the associated country.

As of 31 March 2023, over 200 comic titles had been actively listed under the Group's IPs portfolio. Various active trademarks had been registered within various regions, including Hong Kong, the PRC, and the USA. The group's domain name (culturecom.com.hk) was also kept active. To protect the IPs of the third parties, employees are prohibited from illegally installing and using any pirated computer software. The Group's IT department is responsible for monitoring relevant matters.

## 2. 營運常規 (續)

### B6. 產品責任 (續)

#### 知識產權 (「知識產權」) (續)

倘發現本集團的作品遭到侵權，本集團會寄發一封停止及終止函，告知涉嫌侵權者其觸犯侵權行為及要求該人士停止使用本集團的作品、產品及服務。於尋求法律意見後，本集團將會採取法律行動以阻止專利侵權者進一步生產或出售相關作品、產品及服務。倘海外發生侵權行為，本集團將指派負責人協助及管理與相關國家的任何法律訴訟有關的程序。

截至二零二三年三月三十一日，超過200部漫畫已列入本集團的知識產權組合名下。多項商標已於多個地區(包括香港、中國及美國)註冊。本集團亦會繼續沿用域名(culturecom.com.hk)。為保障第三方的知識產權，僱員一律禁止非法安裝及使用任何盜版電腦軟件。本集團的資訊科技部負責監察相關事宜。



## 2. Operating Practices (Continued)

### B6. Product Responsibility (Continued)

#### Data Protection

The Group understands that it has an indispensable responsibility for the protection of personal data. Data privacy of consumers, customers, and suppliers is strictly protected by the Group. The Group's Privacy Policy Statement has laid out principles to respect data privacy in accordance with the Personal Data (Privacy) Ordinance of the Laws of Hong Kong.

To preserve the confidentiality of customer personal data, the Group maintains the following data privacy principles:

- Only collect personal data that is believed to be relevant and required to conduct the normal course of business;
- Do not disclose any customer personal data unless the Group has expressly informed or got the consent from the customers, or it is required by law;
- Do not transfer personal data to any entity without customers' consent unless it is required by law or it has previously notified the customer; and

## 2. 營運常規 (續)

### B6. 產品責任 (續)

#### 資料保障

本集團深明其有絕對責任保護個人資料。消費者、客戶及供應商的資料隱私均受本集團嚴格保護。本集團的私隱政策聲明已根據香港法例項下的《個人資料(私隱)條例》制定有關尊重資料私隱的原則。

為將客戶個人資料保密，本集團奉行以下資料私隱原則：

- 僅收集被認為對進行日常業務而言屬相關及必要的個人資料；
- 不得披露任何客戶個人資料，除非本集團明確告知客戶或經客戶同意或法律規定；
- 未經客戶同意，不得向任何實體轉移任何個人資料，除非法律規定或已事先通知客戶；及





## 2. Operating Practices (Continued)

### B6. Product Responsibility (Continued)

#### Data Protection (Continued)

- Maintain robust security systems designed to prevent unauthorised access to personal data and implement various physical, electronic and managerial measures to safeguard and secure the personal data that the Group collected.

Terms concerning data protection have been included in contracts with employees, clients and suppliers. The Group also fully protects employees' personal data. All data supplied by the employees during and after the engagement process are kept confidential. An employee can make a written inquiry to the Group to see if the Group holds any of his/her personal data and to get the details of data captured if any.

## 2. 營運常規 (續)

### B6. 產品責任 (續)

#### 資料保障 (續)

- 維持健全的安全系統 (該等系統乃為防止未經授權取得個人資料而設) 並實施不同的實體、電子及管理措施以保護及保障本集團收集所得的個人資料。

有關資料保障的條款已載入與僱員、客戶及供應商訂立的合約。本集團亦充分保護僱員的個人資料。於聘用過程中或之後由僱員提供的所有資料均會保密處理。僱員可以書面形式向本集團查詢，以查看本集團是否持有其任何個人資料並了解所掌握的資料詳情 (倘有)。



## 2. Operating Practices (Continued)

### B7. Anti-corruption

The Group advocates a strong work ethic that insists on compliance with law, integrity, honesty and professional dedication. The Group strictly observes the Criminal Law of the PRC, Anti-Unfair Competition Law of the PRC, Anti-Money Laundering Law of the PRC, Prevention of Bribery Ordinance of the Laws of Hong Kong, and other laws and regulations relating to commercial bribery. The Group has also established the Policy of Anti-Money Laundering and Anti-Extortion to ensure that the Group has proper policies, processes and controls in place to deter money laundering, extortion and other financial crimes.

The Group forbids any form of acceptance of advantages or acts of bribery. Explicit rules concerning employees' professional integrity are communicated through the Employees' Handbook, training courses as well as guidelines. For any suspected cases of money laundering or extortion, employees can fill in the Suspicious Transaction Report ("STR") and submit it to the management for review. The Group will seek legal advice from professional lawyers and take appropriate legal action. The case will be reported to the police, the Independent Commission Against Corruption (the "ICAC"), HKEX and the Securities and Futures Commission ("SFC") if appropriate.

## 2. 營運常規 (續)

### B7. 反貪污

本集團提倡良好工作道德，堅守法律、誠信、忠誠及敬業精神。本集團嚴格遵守中國刑法、中國反不正當競爭法、中國反洗錢法、香港法例項下的防止賄賂條例以及其他與商業賄賂有關的法律及法規。本集團亦已制定反洗黑錢及反勒索政策，以確保本集團設有適當的政策、程序及監控，防止洗黑錢、勒索及其他金融罪行。

本集團嚴禁任何形式的利益收受或賄賂行為，並透過員工手冊、培訓及指引傳達有關員工職業操守的明確規則。僱員可就任何洗黑錢或勒索可疑個案填寫可疑交易報告（「可疑交易報告」），並提交予管理層以供審查。本集團會向專業律師尋求法律意見並採取適當法律行動。有關個案將於適當情況下向警署、廉政公署（「廉政公署」）、聯交所以及證券及期貨事務監察委員會（「證監會」）上報。

## 2. Operating Practices (Continued)

### B7. Anti-corruption (Continued)

Anti-corruption training is crucial to nurturing and maintaining the ethical culture of the Group. The Group provides training to relevant staff (including new staff) to ensure that they are aware of the money laundering and extortion activities in business operations. During the Reporting Period, the directors and employees of the Group received an average of 0.6 hour/employee of training hour on anti-corruption. The training content covered the responsibilities of directors, common integrity risks, case studies, corporate integrity principles and the education services provided by the ICAC. In addition, the Group keeps the transaction records to allow swift reconstruction of individual transaction history, which provides evidence for the prosecution of criminal activities including money laundering. The Group also hires external auditors to conduct independent audits. All these measures effectively promote and improve the implementation of the Group's regulatory system.

No non-compliance with relevant laws and regulations that have a significant impact on the Group relating to corruption, bribery, fraud and money laundering had been identified during the Reporting Period.

## 2. 營運常規 (續)

### B7. 反貪污 (續)

反貪污培訓對培養及維持本集團的道德文化至關重要。本集團向相關員工(包括新員工)提供培訓，以確保彼等知悉業務營運中的洗黑錢及勒索活動。於報告期間，本集團董事及僱員接受平均超過0.6小時／僱員訓練時間的反貪污培訓。培訓內容涵蓋董事職責、常見誠信風險、案例研究、企業誠信原則及廉政公署提供的教育服務。此外，本集團保留交易記錄，以便迅速重建獨立交易歷史，為起訴犯罪活動(包括洗黑錢)提供證據。本集團亦已僱用外聘核數師進行獨立審計。所有此等措施均有效促進及改善本集團監管系統的實施。

於報告期間，概無發現違反有關貪污、賄賂、欺詐及洗黑錢且對本集團有重大影響的相關法律及法規。

## 2. Operating Practices (Continued)

### B8. Community Investment

To stay abreast of the industrial trends and communicate closely with its stakeholders, the Group was a member of the Hong Kong Comics and Animation Federation (the "HKCAF"). The HKCAF has organised a Hong Kong Comics Support Programme (the "HKCSP") to promote development of the comics' industry through funding, training, and professional sharing. As a member of HKCAF, the Group fully supports the exhibitions hosted by HKCAF. For example, the Group has supported the Fifteen Fantasies Comics Exhibition through exhibition of its IPs including graphics and icons.

While formal policies on community engagement are yet to be established, the Group continues to put resources into public education and strives to implement corporate social responsibility and participate in public welfare activities.

## 2. 營運常規 (續)

### B8. 社區投資

為緊貼行業趨勢及與其持份者密切溝通，本集團為香港動漫畫聯會（「香港動漫畫聯會」）成員。香港動漫畫聯會已組織一項香港漫畫支持計劃（「HKCSP」），通過資助、培訓及專業共享促進漫畫行業的發展。本集團作為香港動漫畫聯會的成員，會全力支持香港動漫畫聯會舉辦的展覽。例如，本集團透過展示其知識產權（包括圖像及圖標）支持《一五一十》漫畫展覽。

雖然尚未訂立與社區參與有關的正式政策，本集團將繼續為公共教育投放資源並致力於履行企業社會責任及參與公共福利活動。



## 2. Operating Practices (Continued)

### B8. Community Investment (Continued)

As the main theme of the Group's comic products is the chivalrous spirit of China for thousands of years, the Group aspires to disseminate the idea of "Helping the weak and poor community" to the public through comics products. Since September 2012, the Group has exhibited sculptures of characters in "Dragon Tiger Gate" and "Chinese Hero" at the first ever avenue of stars dedicating to comics – the Hong Kong Avenue of Comic Stars at Kowloon Park in Tsim Sha Tsui, Hong Kong. Since April 2019, the Group has exhibited sculptures of characters in "Dragon Tiger Gate" at the Ani-Com Park@Harbour FUN in Wan Chai, Hong Kong. In addition, there was a Character displayed outside the Hong Kong Heritage Museum in Sha Tin in relation to an event namely, "Hong Kong Pop 60+" Exhibition.

Since the 1930s, there has been a close relationship between comics and films in Hong Kong. To promote and celebrate the intellectual value of both mediums, the Group has contributed comic materials to the Leisure and Cultural Service Department's "Tango Between Images – Hong Kong Films & Comics" exhibition, which has begun in February 2023 and will continue until October 2023.

## 2. 營運常規 (續)

### B8. 社區投資 (續)

由於本集團漫畫產品的主旋律是中國千年的俠義精神，本集團希望通過漫畫產品向公眾傳播「扶弱濟困」的理念。自二零一二年九月起，本集團於香港尖沙咀九龍公園的首個漫畫星光大道，展示「龍虎門」及「華英雄」的角色雕塑。自二零一九年四月起，本集團於香港灣仔香港動漫海濱樂園展示「龍虎門」的角色雕塑。此外，位於沙田的香港文化博物館外亦有一個名為「瞧潮香港60+」的角色展覽。

自一九三零年代以來，香港的漫畫及電影之間一直密不可分。為推廣及慶祝兩者的知識產權，本集團已為康樂及文化事務署的「圖影風姿－香港電影與漫畫」展覽（已於二零二三年二月開始，並持續至二零二三年十月）貢獻漫畫材料。



**CULTURECOM**

文化傳信集團有限公司  
(於百慕達註冊成立之有限公司)  
(股份代號：00343)

CULTURECOM HOLDINGS LIMITED  
(Incorporated in Bermuda with limited liability)  
(Stock Code : 00343)