Environmental, Social and Governance Report 2024





(Incorporated in the Cayman Islands with limited liability) Stock Code: 00794

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# **Report Overview**

Come Sure Group (Holdings) Limited (the "Company" or "Come Sure") along with its subsidiaries (the "Group") is pleased to present its eighth Environmental, Social and Governance ("ESG") Report (the "Report"). The Report aims to describe the Group's strategy, vision, and performance with respect to the environmental, economic and social aspects of its operations.

# **Scope and Period**

Due to the Group's evacuation arrangement from Shenzhen city in 2021, the scope of this Report is based on its operations in Dongguan city. Unless otherwise specified, this Report covers its financial year from 1 April 2023 to 31 March 2024 (the "Reporting Period" or "2024").

This Report focuses on the corrugated paperboard and paper-based packaging products trading and manufacturing businesses of the Group's wholly-owned subsidiary, 廣東錦勝環保科技有限公 司 Guangdong Come Sure Environmental Protection Technology Company Limited\* (the "Come Sure Environmental Protection"), and the offset printed corrugated paper-based packaging products trading and manufacturing businesses of the Group's wholly-owned subsidiary, 廣東錦 勝華銘環保科技有限公司 Guangdong Come Sure Wah Ming Environmental Protection Technology Company Limited\* (the "Wah Ming Environmental Protection"), both located in Guangdong province, the People's Republic of China (the "PRC") which accounted for approximately 85% of the Group's revenue and had been the major operating branch of the Group's business operation during the Reporting Period:

- Come Sure Environmental Protection
- Construction area of approximately 51,482.00 square meters
- During the Reporting Period, the output of corrugated paperboard reached approximately 60,982,000.00 square meters and the output of paper boxes reached approximately 52,784,000.00 square meters
- During the Reporting Period, approximately RMB417.1 million (equivalent to approximately HK\$458.7 million) of the Group's revenue was attributable to Come Sure Environmental Protection
- Wah Ming Environmental Protection
- Construction area of approximately 43,725.00 square meters
- The annual output of paper boxes and cartons during the Reporting Period reached approximately 45,133.00 cubic meters
- During the Reporting Period, approximately RMB171.7 million (equivalent to approximately HK\$188.8 million) of the Group's revenue was attributable to Wah Ming Environmental Protection

<sup>&</sup>lt;sup>\*</sup> The English names of these companies represent management's best efforts in translating the Chinese names of these companies as no English names have been registered.

The scope of this Report has been selected primarily in view of the significant ESG impact and revenue contribution of the operations of Come Sure Environmental Protection and Wah Ming Environmental Protection to the Group. Compared with the ESG report for the financial year from 1 April 2022 to 31 March 2023 ("2023"), the reporting scope of this Report included Wah Ming Environmental Protection. During the Reporting Period, the Group was not aware of any material non-compliance with laws and regulations that have a significant impact on the Group.

## **Standard and Principles**

This Report is prepared in accordance with the ESG Reporting Guide (the "ESG Reporting Guide") under Appendix C2 of the Rules governing the Listing of Securities for the Main Board listed issuers on The Stock Exchange of Hong Kong Limited (the "HKEx"). It complies with the mandatory disclosure requirements and the "comply or explain" provisions of the ESG Reporting Guide. The Group upholds the following principles during the report preparation:

#### Materiality

During the Reporting Period, the Group contracted an independent sustainability consultancy firm to conduct a materiality assessment through gathering different stakeholders' opinions. The assessment aims to identify material ESG issues of the Group, which forms the basis of this Report's structure. For more information, please refer to subsections "Stakeholder Engagement" and "Materiality Assessment" under the section "ESG Strategy".

#### Quantitative

In order to quantitatively evaluate the Group's ESG performance and facilitate future improvement on the Group's green operations performance, this Report disclosed relevant key performance indicators (the "KPIs") and corresponding calculation frameworks and methodologies, as well as environmental targets. For more information, please refer to sections "Greening Our Operations" and "Performance KPIs Statistics".

#### Balance

This Report summarizes the Group's ESG practices, performances and outcomes in an unbiased manner.

#### Consistency

This Report adopts consistent methodologies for meaningful comparison of ESG data over time. To ensure consistent comparisons of ESG data, changes in calculation frameworks, methods and the KPIs used or any other relevant factors shall be fully disclosed.

# **Feedback and Communication**

The Group welcomes readers to provide valuable opinions and suggestions on the content of this Report and its approach to sustainability. If you have any feedback, please contact the investor relations company of the Group, DirectIR Limited. For more detailed information regarding the Group's corporate governance and financial performances, please refer to its Annual Report 2024.

- Email: pr@directir.com.hk
- Telephone: (852) 5318 1969

# About Come Sure

Established in 1987 and listed in 2009, Come Sure has grown from a small workshop-style paperboard processing factory into a modernized, publicly listed paper packaging manufacturer engaging in the manufacturing and sale of corrugated paperboard and paper-based packaging products. Its products range from printed corrugated paper-based packaging products, corrugated paperboard, offset printing packaging products and brochures.

Being engaged in the paper packaging manufacturing business for more than 30 years, Come Sure has established strategic partnerships with more than 250 customers across various industries in the PRC and around the world. Its customers span different industries, including those engaging in business relating to electronic and multimedia products, catering, furniture and other consumer products. This has increased the Group's annual output to approximately 61 million square meters of corrugated paperboard and approximately 53 million square meters of corrugated paper packaging products.

During the Reporting Period, the Group faced with different unfavourable market conditions in the domestic and global economic environment, such as reduced demand, supply disruptions, weakened market expectations, as well as the increase in costs of raw materials and energy in PRC, US destocking and banking crisis, the war in Europe, and geopolitical uncertainties. Thanks to the Group's established credibility and reputation among the PRC paper packaging industry and its ability to further diversify its product mix, the Group was able to secure sales orders, while expanding its sales of paper packaging products to the medical equipment sector.

As a conscious paper-based packaging manufacturer, Come Sure is committed to building an interactive and sustainable corporate culture for its customers, employees, and other stakeholders. Come Sure firmly believes that trust from its customers, health and development of its employees, investment in efficient and environmentally-friendly technologies and proactive exploration of business opportunities are especially important in maintaining its leading position in the industry. Come Sure has always strived and focused to become a one-stop supplier of green packaging solutions and produce high-quality packaging products in a sustainable manner.

# **Come Sure's Sustainable Development Blueprint**

As one of the leading paper-based packaging manufacturers in the PRC, Come Sure actively establishes and maintains long-term cooperative relationships with suppliers that meet the PRC's environmental regulatory requirements, and integrates sustainable ideologies into its operations and the production of its products to further promote environmentally-friendly practices. To this end, the Company's board of directors (the "Board") is fully responsible for the Group's ESG strategy and reporting, and is committed to maintaining and ensuring green and efficient corporate production, operations and management practices through strict compliance with relevant domestic and international standards. At the same time, members of the Board possess the appropriate skills, experience, knowledge, and perspectives necessary to oversee the ESG-related issues of the Group. The following is the role and approach of the Board in managing ESG issues:

- Oversee and review the Group's ESG vision, objectives and strategy for the short-term, medium-term and long-term;
- Identify and determine key ESG topics and strategic priorities of the Group and review it on an annual basis;
- Evaluate, prioritise and manage material ESG-related issues (including risks to the business);
- Evaluate ESG risks and opportunities for the Group;
- Review progress made against ESG-related goals and targets at least once a year and suggest further actions required to improve ESG-related performance;
- Discuss ESG-related issues at least once a year and review and evaluate the Board's responsibility on all ESG-related issues; and
- Undergo relevant trainings to enhance ESG-related know-how and the effectiveness of ESG-related management.

The management of the Group (the "Management") assists the Board in fulfilling its responsibilities with respect to ESG-related issues. The Management is responsible for the implementation of ESG-related issues, assisting in identifying and assessing the Group's ESG-related risks, collecting and analyzing ESG-related data, formulating and regularly reviewing ESG targets and progress, and ensuring compliance with ESG-related laws and regulations. The Management is required to meet at least once a year to evaluate the effectiveness of current policies and procedures and to develop appropriate solutions to help improve the Group's ESG performance. The Management is also required to report its progress, decisions, and recommendations to the Board at least once a year. When appropriate, the Management will engage an external party in facilitating the fulfilment of its responsibility with respect to ESG-related issues.

# **ESG Strategy**

Although various challenges and uncertainties remained despite the gradual recovery from the COVID-19 pandemic, Come Sure has remained focused on implementation of its ESG strategy and improved its problem-solving ability on ESG-related issues. The core vision of Come Sure's ESG strategy is "Reduce Impacts, Recycle Resources, and Reshape Businesses", which reflects the Group's corporate philosophy of manufacturing, operational and economic circularity. Come Sure believes that by bringing together the four aspects of business, people, product, and operation – the four pillars that support and build its core vision – the Group can achieve this core vision. Each aspect consists of specific guidelines that integrate the Group's key concerns and focuses.

# **Business**

## People



With the assistance of an independent sustainability consultancy firm, the Group created a list of environmental mitigation targets in relation to air and greenhouse gases ("GHG") emissions, waste treatment, energy consumption and water usage. The Board monitors and reviews the progress made against these targets annually and makes adjustments to the strategy where necessary. For more information, please refer to the section "Greening Our Operations".

# **Stakeholder Engagement**

The Group strives to develop a more comprehensive ESG strategy in the aspect of humanities. Come Sure believes building connected and trustworthy relationships with its stakeholders enables it to make appropriate adjustments in its policies, practices and risk management, which will better address their interests and expectations. To this end, Come Sure has invited key stakeholder groups to comment on the Group's operations and business, from which Come Sure hopes to gain a better understanding of whether it was meeting their expectations in the above areas. To facilitate effective two-way communications, Come Sure has multiple communication channels for each stakeholder group to keep them informed of the Group's business trends, and at the same time enables Come Sure to listen to their views clearly and deliver solid, ongoing engagement.

Stakeholder Groups	Expectations	Communication Channels
Employees	<ul> <li>Employee health and safety</li> <li>Employee development and training</li> <li>Equal opportunities</li> <li>Employees' rights and remuneration</li> <li>Working environment</li> </ul>	<ul> <li>Meetings and correspondences</li> <li>Training</li> <li>Surveys</li> </ul>
Shareholders and investors	<ul> <li>Compliant operation</li> <li>Risk management</li> <li>Anti-corruption</li> <li>Economic performance</li> <li>Transparency of information</li> <li>Protection of shareholders' rights</li> <li>Corporate governance</li> </ul>	<ul> <li>Annual general meeting and other shareholders meetings</li> <li>Financial reports</li> <li>Announcements and circulars</li> <li>Official website</li> </ul>
Suppliers	<ul> <li>Fair and open procurement</li> <li>Stable business relationship</li> <li>Business ethics and reputation</li> </ul>	<ul> <li>Tendering process</li> <li>Supplier management meetings and events</li> <li>On-site visits</li> <li>Supplier evaluation</li> </ul>
Customers	<ul> <li>Product quality</li> <li>Protection of customers' interest and privacy</li> <li>Stable relationship</li> <li>Quality of customer service</li> <li>Business integrity and ethics</li> </ul>	<ul> <li>Official website</li> <li>Advertising and communication</li> </ul>

Media, non-governmental organizations ("NGOs") and the public	<ul> <li>Transparency of information</li> <li>Community service</li> <li>Environmental protection</li> </ul>	<ul> <li>Official website</li> <li>Press releases</li> <li>Social service</li> <li>Charity events</li> </ul>
Government bodies and regulators	<ul> <li>Compliant operation</li> <li>Risk management</li> <li>Payment of tax</li> <li>Implementation of policy</li> </ul>	• The Group's secretary and in-house solicitor

## **Materiality Assessment**

During the Reporting Period, an independent sustainability consultancy firm was commissioned by the Group to assist in the identification of material ESG issues for its business development through an online questionnaire. The questionnaire also helped to ensure the Group's existing ESG practices, policies and strategies align with stakeholders' expectations.

The questionnaire contains a series of materiality assessments on the ESG issues that have potential impacts on the Group, as well as open-ended questions for the sustainable development of the Group. The Group believes that this questionnaire can comprehensively evaluate the importance of each ESG issue to the Group and stakeholders. By analyzing the answers to the open-ended questions in the questionnaire, it can also understand the Group's current sustainable development performance and identify deficiencies for subsequent improvements in an objective, comprehensive and timely manner.

Step 1 – Identification	<ul> <li>Based on the following strategies, 24 material issues were identified:</li> <li>Internal benchmark (previous ESG reports of the Group)</li> <li>External benchmark (Materiality Map by the Sustainability Accounting Standards Board and ESG reports of industry peers)</li> </ul>
Step 2 – Prioritization	<ul> <li>Online questionnaires were distributed to internal and external stakeholders across the Group. A total of 132 stakeholders have responded to the questionnaire.</li> <li>The Board, members of the Management, employees, and other stakeholders ranked the significance of different material issues according to importance to the sustainable development of Come Sure and the importance to stakeholders.</li> </ul>

Step 3 – Validation and	The Board and Management confirmed and validated the list of	
Review	material issues disclosed in this Report. The Board and	
	Management reviewed the material issues and materiality matrix	
	to ensure a balanced view of the Group's sustainability	
	performance and stakeholders' expectations.	

Based on this three-step approach, the 24 material issues identified by the Group during the Reporting Period were divided into four different aspects. Their relative importance had been transformed into figures through calculations and were further visualized by plotting in the following materiality matrix for easy understanding. The Group shall conduct this survey regularly to keep abreast with its key stakeholders' expectations on the Group's sustainable development.



Importance to the Sustainable Development of Come Sure

Aspect	ltem	Issue	Score (Rank)
Greening Our Operations	1.	Exhaust Gas and GHG Emissions Control	5.31 (22)
operations	2.	Waste Treatment and Waste Reduction	5.43 (=11)
	3.	Energy Savings	5.41 (=14)
	4.	Product Design and Lifecycle Management	5.36 (20)
	5.	Water Savings	5.42 (13)
	6.	Green Supply Chain	5.37 (=17)
	7.	Environmental Initiatives and Action	5.37 (=17)
	8.	Climate Change Mitigation	5.19 (23)
Engaging Our Stakeholders	9.	Employee Physical and Mental Health	5.33 (21)
	10.	Employee Benefits and Career Development	5.46 (9)
	11.	Customer Service and Satisfaction	5.41 (=14)
	12.	Social Contribution	5.47 (=7)
Innovating Our Products	13.	Supply Chain Management	5.43 (=11)
	14.	Responsible Marketing	5.4 (16)
	15.	Product Health and Safety	5.49 (=5)
	16.	Product Quality Control and Assurance	5.63 (1)
Sustaining Our Businesses	17.	Fair Recruitment and Workforce Inclusion	5.54 (4)
	18.	Safeguarding Child Labor and Forced Labor	5.58 (2)
	19.	Risk Management	5.49 (=5)
	20.	Data Privacy and Management	5.47 (=7)

Aspect	ltem	Issue	Score (Rank)
	21.	Respecting Intellectual Property Rights	5.56 (3)
	22.	Anti-corruption	5.44 (10)
	23.	Industry Standards and Legal Compliance	5.37 (=17)
	24.	Board Diversity and Competence	5.16 (24)

To determine the reporting structure for this Report, the Group used an average score to assess and represent the overall importance of the four main aspects. The suggested reporting structure is consistent with the scores for each aspect and is as follows:

Aspect	Score	Rank
Greening Our Operations	5.36	4
Engaging Our Stakeholders	5.42	3
Innovating Our Products	5.49	1
Sustaining Our Businesses	5.45	2

## Awards and Recognition

Whether in the present, past or future, Come Sure is committed to becoming a diversified, modern and all-round excellent enterprise with packaging as its main focus. The Group strives to devote itself to the construction of the motherland and give back to the society. At the same time, the Group adhere to the principle of combining economic and social benefits to achieve sustainable development. The following awards demonstrate the recognition and affirmation of Come Sure's sustainable development initiatives from all walks of life over the years:

Year	Award	Awarding Organization
2023 - 2026	<ul> <li>Certificate for High and New Technology Enterprise in Guangdong</li> <li>Wah Ming Environmental Protection</li> <li>Come Sure Environmental Protection</li> </ul>	

# **Greening Our Operations**

As a corrugated paperboard and paper-based packaging products manufacturer, raw paper is the Group's primary material used for production and administrative purposes. The Group's core business inevitably relates to wood, which is a precious natural resource that is also critical in combating climate change. Due to its function in its ecosystem, it is imperative that the Group does not harm or interfere with its role in maintaining the ecosystem. Therefore, the Group's main business model focuses on two main environmental strategies: to promote the use of sustainable wood products, and to continuously reduce its impact on the natural environment.

From material procurement, packaging design, resource usage in production to finished product sales, the Group always integrates the concept of sustainable development into the focus of its business to gradually transform into a one-stop green packaging industry.

The following circular flow chart shows how the Group incorporates paper in an environmentallyfriendly manner into its operations:



## **Responsible Procurement**

Procurement is the most fundamental part of its paper recycling system at the beginning of the Group's business cycle. The Group pays great attention to the sourcing of green raw materials, as well as the environmental and social requirements of its suppliers, ensuring the best sustainable supply chain that enables the Group to achieve green production. The Group's main strategy on procurement is to promote the use of sustainable wood products. Also, in the designing, manufacturing and production of the Group's products, the Group strictly complies with the ISO 14001:2015 environmental management system standards. Both Come Sure Environmental Protection and Wah Ming Environmental Protection have been certified with ISO 14001:2015 environmental management system.

# Green Supply Chain

Green procurement is a key element in achieving responsible sourcing. To avoid potential waste from the unnecessary procurement of materials, Come Sure formulated the "Procurement Control Procedures" (《採購控制程序》), which differentiates materials into two different levels based on their functions. The first level is to define basic production resources such as base paper, starch, and flour as the main materials directly obtained by the Procurement Department. The second level is auxiliary materials for the production, including borax, caustic soda, ink amongst others, which can only be procured upon approval.

For wood products (which were mainly the base paper), the Group primarily sources reused or recycled paper as its raw material. Any reused or recycled paper purchased will only be made in accordance with customer specifications, and only raw paper with a Forest Stewardship Council ("FSC") label will be purchased.

In addition, Come Sure strictly abides by the requirements of the latest Chain of Custody (the "CoC") Certification standard, which sets forth its commitments, organizational structure, responsibilities and the correlation between departments and employees who are directly associated with the CoC of the FSC. Come Sure has also developed guidelines taking into account of the requirements, processes and governance provisions on the CoC system. Come Sure applied this to all FSC-certified purchases and made this policy mandatory for all procurement personnel. Come Sure will continue to meet the requirements of the FSC and strengthen the procurement and use of FSC-certified materials and products.

# Supplier Communication

The Group complies with its established "Supplier Management Procedure" (《供應商管理程序》), and additional stringent environmental, social and quality standards to conduct its annual "Supplier Assessment Program" (《供應商評估計劃》).

### New Suppliers Engagement

Prior to contract signing, the Group requires new suppliers to provide materials for trial tests. Upon passing the test, the Group will conduct on-site evaluation. Suppliers can only be considered for further corporation when they meet the following conditions:

- Sufficient corporate documents and production certificates
- High-standard operations that comply with the Group's requirements regarding quality, environmental, and hazardous substance management system
- Good reputation and previous performance

### Suppliers' Risk Assessment

The Group periodically assesses the risk levels of its existing suppliers. The Group lists the manufacturers that provide substances with potential environmental impacts as high-risk suppliers. For high-risk suppliers, the Group shall conduct monthly assessments and on-site reviews at least once a year, and the Group strictly monitors their production process to manage various risks. For substances supplied by high-risk suppliers, environmental test is required for each batch. High-risk substances include:

- Substances that are of concern in accordance with international and domestic regulations, as well as customer requirements
- Substances that the Group considers to be high-risk
- Substances that have experienced abnormal hazardous material incidents in the industry
- Substances that are indicated as hazardous by Substance Safety Data Sheets and internal and external environmental testing reports

### Suppliers Annual Management

The Group conducts supplier evaluations according to the "Supplier Evaluation Plan" (《供應 商評估計劃》) on an annual basis. Suppliers are evaluated based on the following criteria:

- Delivery time
- Products quality performance

- Reputation and company image
- Product price
- Service quality
- Environmental impact of materials

All of the Group's supplies are subject to the relevant supply chain policies and practices relating to engaging suppliers mentioned above.

The Group regularly reviews its policies and measures related to supply chain management to ensure their effectiveness. During the Reporting Period, the Group evaluated 45 suppliers in the PRC in accordance with its "Supplier Management Procedures" (《供應商管理程序》) and all suppliers have passed the above-mentioned practices for engaging or reviewing suppliers. The annual average score for monthly evaluations of suppliers during the Reporting Period is approximately 93%.

# **Reduction, Reuse and Recycling of Materials**

As a one-stop green packaging supplier, the Group is committed to implementing "zero waste" in the production process. The Group employs a professional design team in green production. The team has 6 professional designers with over 10 years of experience in packaging design. They are mainly responsible for meeting customers' product design requirements, processing technology requirements, cost requirements, and green packaging requirements. By integrating 3D product information and software such as Solidworks, Creo, and AutoCAD, the team was able to design a comprehensive packaging solution composed of a variety of materials, including paper, polystyrene, polypropylene plastic foam, foamed polyethylene, foamed polystyrene polyethylene blends such as styrene and molding pulp.

After confirming the packaging design, the team will develop packaging products according to the design specifications, including the use of corrugated cardboard, printed corrugated packaging products, pulp molding, drum boards, corrugated corners, self-adhesive, plastic bags, styrofoam, and hand-stitching. Through the close cooperation of design and packaging teams, the Group strives to provide customers with the highest quality packaging solutions while minimizing material usage at the design level and maximizing the use of reusable or recyclable materials at the manufacturing level. During the Reporting Period, unless specified by customers, 100% of the raw paper used is reused or recycled paper. Additionally, both Come Sure Environmental Protection and Wah Ming Environmental Protection are equipped with waste paper recycling systems, where the generated waste paper from the production process is collected, packaged, and sold to the base paper suppliers for processing and reuse. The Group then repurchases these materials to enhance the utilization rate of trimmings and waste paper.

# **Efficient Consumption of Resources**

Resources consumed by the Group mainly include fossil fuels, purchased electricity and water that are used for production purposes in factories, as well as office paper. During the Reporting Period, the Group did not encounter any issue in sourcing resources. Come Sure adheres to the guidelines in "Energy Saving and Consumption Reduction Control Procedures" (《節能降耗控制 程序》) and "Resources and Energy Management Procedures" (《資源、能源管理程序》) to carry out smart consumption.

#### Oil and Gas

- 1. Lubricating oil, petroleum and diesel oil shall be allocated and managed by factories
- 2. Ensure enclosure and proper sealing of bottles or canisters
- 3. Store it in a cool and dry place and avoid pouring or leakage
- 4. Regularly inspect and maintain oil-using equipment
- 5. Arrange one vehicle for order destinations that are adjacent to one another to minimize multiple round trips

#### Oil and Gas

- 1. Properly seal the air-conditioned area and control the central air conditioning temperature reasonably, maintaining it not lower than 26 degrees Celsius in summer and not higher than 20 degrees Celsius in winter
- 2. Turn off the lights after work
- 3. Use energy-saving lamps and LED lighting fixtures
- 4. Record the electricity consumption of each meter monthly
- 5. Check and record abnormal electricity consumption
- 6. Establish new energy consumption targets and performance indicators
- 7. Regularly maintain and service production equipment to ensure optimal working condition
- 8. Implement frequency control on production equipment and adjust it according to production needs to avoid excessive energy consumption
- 9. Shut down non-operating production components during non-working hours to reduce standby power loss

#### Water

- 1. Reuse cooling water generated from production equipment
- 2. Place water conservation signs in factories
- 3. Record, analyze and report the water consumption of each unit on a monthly basis
- 4. Ensure proper management of water cisterns and carry out daily inspection by the security team
- 5. Maintain and replace water faucets to prevent leakage and dripping
- 6. Maintain and replace problematic water meters to ensure accuracy

#### **Office Paper (Others)**

- 1. Gradually switch to an electronic administration system
- 2. Send substandard products to the paper separator machine for recycling
- 3. Use both blank sides of paper (except for statements, records and invoices)

## **Exhaust Gas and GHG Emissions Control**

Come Sure dutifully and continuously monitors and controls various emissions from its operations. To do this, it identifies all sources of factory exhaust gas and put in place appropriate controls to ensure they are properly managed prior to discharge. During the Reporting Period, the Group was not aware of any non-compliance with relevant laws and regulations that have a significant impact on the Group relating to air and greenhouse gas emissions, discharges into water and land, and generation of hazardous and non-hazardous waste.

## **GHG** Emissions

In response to the notice of State Council of the PRC on the issuance of the "12th Five-Year Plan" (「十二五」) for the control of GHG, the Group has developed the "Greenhouse Gas Quantification and Reporting Management Procedures" (《溫室氣體量化和報告管理程序》) and established the "Greenhouse Gas Management Operational Boundary Diagram" (《溫室氣體管 理運行邊界示意圖》).

At the same time, in order to quantitatively monitor GHG emissions to comply with the principles of relevance, consistency, completeness, transparency and accuracy, the Group has established the "Greenhouse Gas Quantification Data Quality Management Procedures" (《溫室氣體量化數 據質量管理程序》). In accordance with the requirements of the HKEx, the Group annually engages an independent sustainable development consulting company to calculate its GHG emissions. This enables the Group to monitor its level of GHG emissions and the effectiveness of corresponding control measures, aiming to continuously improve its production and operational processes and gradually reduce GHG emissions. For other measures related to energy conservation and emissions reduction, please refer to the section "Efficient Consumption of Resources" and subsection "Air, Noise and Sewage Emissions" under this section.

During the Reporting Period, the Group's GHG emissions were mainly from direct GHG emissions from boilers, canteen stoves and vehicles (Scope 1), and energy indirect GHG emissions from purchased electricity (Scope 2). For detailed breakdown of GHG emissions data, please refer to the section "Performance KPIs Statistics".

## Air, Noise and Sewage Emissions

Guided by "Control Procedures for Noise, Wastewater and Exhaust Gas" (《噪聲、廢水、廢氣控 制程序》) and "Management Procedures for Supervision and Measurement" (《監視與測量管理 程序》), Come Sure develops rigorous measures to control emissions, including air, noise, and sewage emitting from the manufacturing process. The measures taken by the Group regarding air emissions, noise emissions, and sewage discharge are as follows:

#### **Air Emissions**

- Install and maintain volatile organic compound collection and treatment equipment on all printing equipment
- Regulate the amount of nitrogen oxide ("NOx") emissions under 60mg/m<sup>3</sup>
- Inspect and maintain all vehicles on an annual basis
- Contract a qualified third-party professional agency to conduct air emission assessments on particulate matter ("PM"), black carbon, sulfur dioxide ("SOx"), and NOx quarterly

#### **Noise Emissions**

- Set up noise-barriers and anti-vibration for facilities with high noise emissions
- Ensure noise level within the boundary of factories is in compliance with regulatory levels: 60 dBA daytime and 50 dBA night-time
- Contract a qualified third-party professional agency to conduct annual noise monitoring assessment

#### Sewage Discharge

- Launched Wastewater Zero Discharge Scheme in 2018
- Wastewater from cleaning machines and inking equipment must be processed on-site and recycled for use in the production plant
- Waste oil must be centrally collected and separately stored for treatment by qualified contractors
- Employees are forbidden to flush various wastes, soil or garbage into sewers
- Sewers and rainwater pipelines are cleaned regularly
- Contract a qualified third-party professional agency to conduct wastewater emission assessments on pH value, color, biochemical oxygen demand, chemical oxygen demand, suspended matter and ammonia nitrogen quarterly
- Wastewater generated by cleaning machines and inking equipment is treated for recycling in the production workshop

During the Reporting Period, the Group's air emissions derived from the usage of a stationary boiler powered by natural gas and the usage of 15 company-owned vehicles (2023: 10 vehicles) that include cars and forklifts powered by gasoline and diesel. For detailed breakdown of air emissions data, please refer to the section "Performance KPIs Statistics".

## Waste Treatment and Reduction

Waste management is an important pillar in its production process to promoting green operations. Come Sure has developed specific guidelines on the management of all hazardous and nonhazardous materials to ensure all materials from the production processes are either recycled as much as possible or carefully disposed of.

### Hazardous Substances and Waste

To ensure the quality of its environmentally friendly products and reduce their impact on the environment, Come Sure has developed the "Hazardous Substances Management System" (《有 害物質管理程序》) to control hazardous substances generated from product materials, and from each stage of the life cycle of processed products.

Information of hazardous substances related to the Group's production, such as organic oil and cleaning agents, oxygen bottles and acetylene bottles, is listed in the Group's Substance Safety Data Sheets. The Group regularly evaluates and inspects warehouses that store hazardous substances, and require employees to be vigilant when storing, handling and disposing such substances. In addition, the Group's products follow the Hazardous Substance Free ("HSF") principle. The Group's production process adopts the HSF management system, which has acquired the IECQ QC 080000: 2017 certification. After the production is completed, the Group will place a HSF label on the finished products. Its finished products have met the requirements of the Directive of Packaging and Packaging Waste (the "PPWD") of European Union, the Restrictive of Hazardous Substances Directive (the "RoHS") of European Union, the Registration, Evaluation, Authorisation and Restriction of Chemicals (the "REACH") of the European Union, the Toxic Substances Control Act (the "TSCA") of the United States, and the Toxics in Packaging Clearinghouse Model Legislation (the "TPCH") of the United States.

Other hazardous wastes of the Group include used fluorescent tubes, ink cartridges, and waste oil. The Group collects these wastes in a secure and separate manner, and store them in containers that are waterproof, sealed, labeled, and properly covered. Further treatment shall then be carried out by qualified third party collectors on a regular basis.

## Non-hazardous Waste

The Group divides its non-hazardous wastes into two main categories, namely non-recyclable and recyclable waste, and applies different follow-up treatments according to their nature. The Group installed eight colored bins at factories that are labeled with waste subcategories to collect other non-recyclable wastes, including construction waste, food waste and household waste.



Come Sure Paper Recycling Flowchart

For detailed breakdown of hazardous and non-hazardous wastes produced, please refer to the section "Performance KPIs Statistics".

## **Risk Mitigation**

Come Sure is committed to minimizing operational risks. Each year, the Group conducts comprehensive inspections of various aspects of its operations and updates the Risk Identification and Evaluation Form (《風險因素識別與評估表》). Based on the likelihood and severity of different risks, the Group determines their respective risk levels. For high-risk risks, the Group designates specialized personnel to handle response and risk management. In addition, the Group pays special attention to environmental risks. The Group has established dedicated risk identification and evaluation questionnaires, which are distributed to relevant departments annually to identify high-risk environmental factors. Targeted measures are implemented in daily operations to strengthen management and risk control in response to these identified high-risk factors. The following are the significant environmental risks identified by the Group during the Reporting Period, along with the corresponding preventive measures:

Risk Impact	Preventive Measures
The product is flammable, easily resulting in fire and explosion and would be causing production suspension, casualties and property losses.	<ol> <li>Employees are strictly forbidden to bring lighters into the factory, and it is strictly forbidden to smoke in the factory;</li> <li>Install sufficient firefighting equipment and carry out daily inspections;</li> <li>Conduct two fire safety inspections on the factory area, living area and dormitory area every month;</li> <li>Conduct fire safety training for employees and conduct fire evacuation and escape drills regularly; and</li> <li>Formulate a fire safety management system and strictly implement it.</li> </ol>
The pressure on the three wastes (sewage, exhaust gas and solid waste) management has increased, and the investment in manpower and physical resources has increased.	<ol> <li>Fully use of natural gas boilers and eliminate and dismantle old boilers;</li> <li>Recruit sewage treatment technicians, improve sewage treatment engineering, and introduce automatic sewage treatment equipment;</li> <li>The sewage is converted from external discharge to all recycling, and apply for a zero sewage discharge permit; and</li> <li>Repair pit machine yurts to reduce noise emission decibels.</li> </ol>
The noise generated by various equipment and facilities may lead to health issues, decreased work efficiency, and increased safety risks.	<ol> <li>To control the noise within the factory premises and minimize its harmful impact on employees;</li> <li>Whenever possible, opt for low-power equipment to reduce noise. When purchasing machinery and equipment, consider their noise levels;</li> <li>Follow the maintenance guidelines and schedules provided for each machine/equipment, conducting regular maintenance and servicing to ensure their proper operation; and</li> <li>Invite the environmental department to conduct regular monitoring of wastewater, emissions, and noise according to the "Environmental Monitoring and Measurement Program" (《環境監測與測量程序》). If any non-compliance is identified, immediate corrective actions should be taken in accordance with the "Non- Compliance, Corrective, and Preventive Measures Program" (《不符合、糾正與預防措施程式》).</li> </ol>

Risk Impact	Preventive Measures
The reused water is used in the pulping process of paperboard production. The quality of the reused water that does not meet the standard directly affects the quality of the product, especially the environmental compliance of the product.	1. Purchase high-quality pharmaceuticals. All pharmaceuticals must comply with RoHS and other environmental protection requirements (provide detection reports for harmful substances).
The harmful substances such as heavy metals in the reused water exceed the standard, directly leading to the harmful substances in the product exceeding the standard, reaching the customer, and being complained, returned, and claimed for compensation by the customer.	1. Sewage treatment is standardized, and water quality is strictly tested and recorded.

## Climate Change

The Group has established relevant policies to identify any physical and transition risks caused by climate change, and to adapt to and/or mitigate major impacts on the Group's business associated with identified risks. During the Reporting Period, the Group conducted a climate change risk assessment to determine the likelihood of future climate events and their potential impact on the Group's operations. This assessment refers to KPI A4.1 of the HKEx ESG Reporting Guide and referenced the framework of the Task Force on Climate-related Financial Disclosures ("TCFD"). The Group has separately assessed physical risks, which include acute physical risks from extreme weather events and chronic physical risks from long-term climate pattern changes. It has also evaluated transition risks, which encompass risks arising from policy and legal requirements, technological advancements, market shifts, and reputational considerations associated with the transition to a low-carbon economy. Regarding physical risks, climate change has resulted in more frequent and intense extreme weather events. These events have the potential to disrupt transportation services, leading to delays in the delivery of raw materials and the Group's products. In severe cases, the normal operations of the Group may also be affected, and the personal safety of employees could be at risk. Mishandling such events can negatively impact the Group's reputation. The Group's revenue may be negatively affected by such events. Regarding transition risks, stricter low-carbon transition and environmental regulations may increase the risk of claims and lawsuits if the Group fails to comply with compliance requirements. This, in turn, can affect the Group's reputation. Additionally, as PRC may gradually include the paper industry in the carbon trading market in the future, failure to reduce carbon emissions to levels below the allocated quotas would require the Group to purchase additional carbon credits, which negatively impact its profitability. Furthermore, as the push for climate transition continues, there is a growing demand in the market for sustainable and environmentally friendly products. Consumers and businesses are increasingly concerned about environmental and climate change issues, and they prefer to purchase paper packaging products that are made from renewable materials, have low carbon emissions, and are recyclable. Failure to meet the market's increasing demand for environmentally friendly products may result in a loss of competitive advantage, leading to risks such as declining sales and reduced market share.

Climate Change Related Risks (Physical Risk)	Mitigation Measures	
Typhoon	Create special work arrangements, implement a home office system for employees in case of typhoons, and temporarily suspend production in severe cases.	
Heat wave	Each post in the factory is equipped with fans and industrial fans to facilitate ventilation and heat dissipation. In addition, plum syrup is made every day to relieve the heat.	
Thunderstorm	The factory is equipped with lightning protection facilities to monitor lightning conditions. It also pays attention to local government thunderstorm warning information in real time, and arranges employees to work from home. In severe cases, production will be temporarily suspended.	
Extreme rainfall	The building foundation is considered when choosing an address for the factory, which is higher than the surrounding roads, and extreme rainfall is discharged through the municipal pipeline, that minimised the impact on the production and operation of the factory.	

The following table summarizes the 5 high-risk events and corresponding mitigation measures after its analysis and evaluation:

Climate Change Related Risks (Transition Risk)	Mitigation Measures
Uncertainty about market changes	Actively communicate with customers and leading companies in the industry, understand market changes and adjust marketing strategies and market development in a timely manner.

# **Environmental Targets**

For the financial year from April 1, 2020 to March 31, 2021 ("2021"), the Group formulated a series of environmental targets to reinforce its ambition to mitigate its impact from daily operations and protect the environment. The Group's achievements and progress during the Reporting Period to realize these goals are presented below.

Targets	Status	2024 Progress	New or continued targets set in 2024			
Air and GHG Emissions	Air and GHG Emissions					
In 2024, organize annual activities to raise employee awareness of reducing GHG emissions or low-carbon living	Achieved	The Group promotes low- carbon initiatives during regular meetings, encouraging employees to carpool as much as possible when traveling for business purposes. Additionally, the Group encouraged its employees to use public transportation such as buses and subways for their commute. The Group also installed charging stations to support employees who choose to commute by electric vehicles.	For the financial year from 1 April 2024 to 31 March 2025 ("2025"), organize annual activities to raise employee awareness of reducing GHG emissions or low- carbon living			
Waste Treatment						
By 2025, ensure 95% of raw papers are recycled paper	Achieved	95% of raw paper used is made from recycled paper	In 2025, organize annual activities to raise employee awareness of reducing waste			
<b>Energy Consumption</b>						
By 2025, purchase at least 1 kind of renewable energy and include it in energy consumption (e.g. solar power system, biomass)	In Progress	At present, the Group is identifying and assessing various renewable energy sources that can be adopted to support its operations	By 2025, continue to purchase at least 1 kind of renewable energy and include it in energy consumption (e.g. solar power system, biomass)			

Water Usage						
By 2025, reach 50%	Achieved	Over 50% recycling and reuse	By 2025, continue to			
reuse rate of cooling		rate of cooling water produced	reach 50% reuse rate			
water generated from		from workshop equipment	of cooling water			
workshop equipment			generated from			
			workshop equipment			

# **Sustaining Our Businesses**

The Group is dedicated to combining economic profits and social morality, adhering to its internal policy "Business Ethics Standard Management System" (《商業道德規範管理制度》), to ensure sustainable development of the Group's business in an ethical manner.

# **Industry Standards and Legal Compliance**

The Group closely follows industry standards and monitors its legal compliance to ensure that it can produce green, high-quality paper packaging products, while helping to put its sustainability and social responsibility concepts into practice. During the Reporting Period, the Group was not aware of any material violations related to laws and regulations. For more details, please refer to section "Policies and Legal Compliance". The following are the international standards that its subsidiaries currently meet:

## **Come Sure Environmental Protection**

ISO 9001:2015 Quality Management System ISO 14001:2015 Environmental Management System IECQ QC 080000:2017 Hazardous Substance Process Management

### Wah Ming Environmental Protection

ISO 9001:2015 Quality Management System ISO 14001:2015 Environmental Management System ISO 13485:2016 Medical Device Quality Management System IECQ QC 080000:2017 Hazardous Substance Process Management FSC Chain of Custody Standard G7 Master Facility Targeted Certification GMI Lithographic – Process Color and Spot Color Certification

## Come Sure Packaging Products (Shenzhen) Co. Ltd.

FSC Chain of Custody Standard

# Fair Recruitment and Workforce Inclusion

The Group strives to be an organization and employer that promotes inclusivity and equal opportunities, respects the concept of equality and strives to promote the fundamental values of diversity, mutual respect, equality and opposition to all discriminatory practices. In the workplace, the Group follows the principles of equality, fairness and prudence set out in the "Anti-Discrimination Management System" (《非歧視性管理制度》). The Group strictly prohibits any biased preference based on race, nationality, religion, gender, age, disability or language, and all hiring should be determined solely by the candidate's overall performance. Before signing an employment contract, the Group will inform candidates of detailed job responsibilities, remuneration packages and other regulations.

To facilitate gender equality in the workplace, the Group specially implemented the "Management System for the Protection of Female Employees During Pregnancy and Lactation Period" (《 $\pm$ ) facp期和哺乳期的保護管理制度》). In doing so, the Group strives to provide female employees with the same opportunities as their male co-workers for learning, development and job advancement.

During the Reporting Period, the Group was not aware of any non-compliance with relevant laws and regulations that have a significant impact on the Group relating to equal opportunity, diversity, recruitment and promotion, compensation and dismissal, anti-discrimination, working hours, rest periods, and other benefits and welfare.

## **Data Privacy and Protection**

Come Sure respects and protects customers' and employees' personal information, as well as the Group's commercial and trade secrets, while strictly complying with relevant laws and regulations. The Group requires employees to adhere to the following rules detailed in the "Employees Handbook" ( $\langle \exists \bot \mp \boxplus \rangle$ ).

As stipulated in the handbook, employees are prohibited from disclosing any confidential data such as:

- The Group's market research and surveys
- The Group's investigations and inspection results
- The Group's technical documents, drawings and notices
- Customers' personal information such as price list, commercial agreements, and order details

In the unlikely event where there is any violation of data privacy, the Group shall take immediate remedial measures and appropriate disciplinary actions, depending on the severity of the situation. The Group will regularly review relevant systems and measures to ensure their effectiveness. During the Reporting Period, the Group was not aware of any non-compliance with relevant laws and regulations that have a significant impact on the Group relating to confidential data or information breach.

# **Respecting Intellectual Property Rights**

The Group attaches great importance to intellectual property rights, and continues to innovate in production processes, testing capabilities and product categories. As such, the Group has established a special committee to work in accordance with the principle of "leadership determination and hierarchical management" (「統一領導,分級管理」). This committee is responsible for formulating the Group's intellectual property protection policy and proposing solutions when encountering intellectual property problems.



As the Group possesses advanced technological capabilities, it follows an orderly guideline to apply for patents.

- 1. Conduct patent and scientific literature search
- 2. Establish research and development projects
- 3. Examine patent application upon project completion
- 4. Take effective protection measures in a timely manner

The Group has obtained 7 utility model patents and 1 design patent related to the production and testing of corrugated cardboard and paper boxes as well as 1 utility model patent related to color printing packaging paper boxes. Moving forward, the Group will continue to demonstrate sound management through the committee and safeguard the intellectual property rights of the Group and industry peers.

# **Preventing Child Labor and Forced Labor**

As a responsible manufacturer, Come Sure safeguards labor rights and adheres to rigorous labor standards, recruiting labor in a legal and ethical manner.

The Group complies with the "Child and Underage Labor Protection Management System" (  $\langle \pm \Box \& \pm \& \oplus \bot \& \oplus \bot \& \oplus \blacksquare \rangle$ ) during the recruitment process. The Group will conduct thorough checks on candidate's information, such as ID cards, academic certificates, and qualification certificates, to ensure that all recruited employees are of legal working age. When a child labor case is discovered, the Group will pay the child labor wages and escort them back to their original place of residence in a safe and timely manner, especially those with financial difficulties. The Group will also bear the tuition fees and ensure that they receive education.

According to the "Non-Forced Labor Management System"(《非強迫勞工管理制度》), the Group strictly stipulates the statutory working hours for employees and safeguards their freedom in all aspects. The Group does not allow employees to be forced into work by means of violence, threats or any illegal restrictions to personal freedom. If a forced labor case is found, the Group encourages relevant personnel to immediately report to the employee representative, who shall subsequently arrange a meeting with Management to propose a confirmed solution or compensation. During the Reporting Period, the Group was not aware of any material non-compliance with relevant laws and regulations that have a significant impact on the Group relating to preventing child and forced labor.

In addition, the Group prohibits any form of discriminatory abuse and respect the legal rights of all employees. To this end, the Group formulated the "Management System of Anti-Mental and Physical Abuse" (《反精神及肉體虐待管理制度》), which underscores its commitment to being a responsible and ethical employer. As detailed in the policy, the freedom of employees is not subject to any form of restriction such as corporal punishment, physical contact, mental coercion or verbal abuse. If such a case occurs, the abuser will receive a verbal warning, have their contract rescinded or even be handed over to the judiciary.

The Group will regularly review these systems and measures to ensure their effectiveness.

# **Anti-corruption**

The Group strictly abides by national laws and regulations related to commercial crimes such as bribery, extortion, fraud, and money laundering. The Group requires employees not to accept any present or gift from any third-party, nor secure orders through undue means. In order to monitor the Group's overall business conduct, the Group has an effective "Whistle-blowing Policy" ( $\langle B R \Sigma R \rangle$ ) in place. The Group has established different reporting channels such as suggestion boxes, telephones, or in-person meetings with the Group's management. The Group encourages employees and business partners to report and expose corruption. The whistle-blowing process must be strictly confidential, and employees are strictly forbidden to disclose any information that could affect the investigation results. The Group also ensures the protection of whistle-blowers (including the confidentiality of identity and personal information) to prevent retaliation for reporting in good faith. Depending on the seriousness of the situation, the Group will implement disciplinary measures such as verbal warnings, dismissals and prosecutions in a timely and appropriate manner. The Group will regularly review these measures and policies to ensure their effectiveness.

The Group provides anti-corruption training or relevant learning materials to its directors and staff annually. During the Reporting Period, directors of the Group participated in an anti-corruption training provided by the Independent Commission Against Corruption of Hong Kong. The Group also organized a one-hour anti-corruption training for department heads and management staff, which has a total of 18 participants (2023: 23 employees participated in a one-hour anti-corruption training). During the Reporting Period, the Group was not aware of any corruption litigation cases (whether concluded or not) against the Group or its employees (2023: Nil). The Group was also not aware of any non-compliance with relevant laws and regulations that have a significant impact on the Group relating to bribery, extortion, fraud and money laundering.

# **Innovating Our Products**

Come Sure is committed to continue strengthening its leadership position in the paper packaging industry. In balancing quality standards and ecological awareness, the Group employs monitoring techniques throughout the manufacturing process while striving to ensure the best quality of its products. The Group also invests in environmentally-friendly technologies that enable its products to respond to the growing number of sustainability issues. To ensure timely understanding of the latest market demands, the Group adheres to the concept of "Customer first, Market-oriented" in its business operations, and actively utilize tailor-made packaging solutions and value-added services to serve its customers.

# **Production and Fire Safety**

Fire accident is the most serious fatal injury for the paper packaging manufacturing industry. Although its incidence is low, the consequences are extremely serious. Therefore, the Group puts fire safety first and develops a complete set of preventive measures and handling procedures to prevent fires from occurring. Once a fire breaks out, the Group can also ensure that the accident can be dealt with in a timely manner, including self-control or extinguishing of the fire, until the support of the fire department personnel.

The Group has established the Fire Safety Management System (《消防安全管理制度》) to reduce and avoid casualties and property damage caused by fire accidents. The measures are as follows:

- Establish different fire safety working groups such as a safety committee, emergency command centre and volunteer fire brigade
- Regularly organize fire safety education, training and drills for employees
- Regular inspection of flammable materials, maintenance of fire extinguishers and other related inspections

During the Reporting Period, the Group regularly conducted fire drills and fire safety training for employees. In particular, the Group organized a fire drill with the theme of "Nighttime Emergency Evacuation and Fire Exercise," in which both night shift employees and dormitory residents participated. The purpose of this drill was to assess the response speed of night shift employees and dormitory residents in emergency situations at night, evaluate their ability to correctly use various fire-fighting equipment provided by the group, deepen their understanding of the group's fire protection system and escape routes, enhance their fire safety awareness, and improve their organizational, handling, and self-rescue capabilities in fire-fighting efforts.

The fire drill was successful and achieved the following expected objectives:

- Night shift employees and dormitory residents acquired basic knowledge of using fire-fighting equipment. Each department had employees personally extinguish fires using fire extinguishers. All employees became aware of the hazards of fire and gained a basic understanding of evacuation routes, key points to note during evacuation, self-rescue and first aid techniques, as well as precautions for fire extinguishment
- During the evacuation, employees were able to locate safe exits without incidents of overcrowding or pushing. The evacuation took 3 minutes and 50 seconds
- The safety and effectiveness of the factory's alarm system were verified
- The flushing pressure and height of the fire hydrants were inspected and found to meet the requirements

Moving forward, the Group will continue to regularly conduct relevant emergency drills for employees to maintain vigilance and resilience to accidents.

# **Product Quality Control and Assurance**

To ensure the provision of high-quality products and services, the Group adheres to a meticulous quality control policy. The Group emphasizes employee participation across different departments, and require vigilance in the selection of suppliers, sourcing and inspection of raw paper, storage, usage, manufacturing, testing, packaging, finished product storage, loading, transportation, delivery, as well as after-sales service. The Group thoroughly analyzes the product lifespan and adopts a tailor-made monitoring strategy to ensure product quality in each stage of the production process. During the Reporting Period, the Group was not aware of any non-compliance with relevant laws and regulations that have a significant impact on the Group relating to health and safety, advertising, labelling and privacy matters.

## 1. Raw Paper Controls

Following the "Operational Guidelines for Incoming Inspection" (《進料檢驗作業指引》), the Group will conduct preliminary inspections on all imported raw papers, including checks on appearance, structure, physical and environmentally-friendly properties. Raw papers are subsequently approved to enter the manufacturing process upon passing the inspections.

#### 2. Manufacturing Process Control

Prior to formal production, technicians from the Production Department will carry out a dual inspection on raw papers. Apart from confirming the environmentally-friendly properties of raw papers, verification on the production templates is also carried out to ensure the products are produced according to the customer's instructions.

For different production processes, the Group has formulated corresponding inspection strategies:

- For the production of paperboard, operators will conduct inspections in accordance with the "Operational Guidelines on Inspection for Corrugated Paperboard Process" (《瓦楞紙板工 序檢驗作業指引》) and "Product Inspection Standards" (《產品檢驗標準》) to ensure a stable production line.
- For the production of paper packaging products, operators will conduct inspections according to work orders, drawings, samples and "Product Inspection Standards" (《產品 檢驗標準》) to meet customer requirements.

In addition, it is necessary to operate heavy machinery in the production process, and the Quality Control Department will carry out further evaluation to evaluate the production process. Mass production is possible only after passing the test.

### 3. Final Products Control

After the mass production is completed, operators will conduct random or comprehensive inspection of the finished product according to customer requirements. Defective products will be screened out, and qualified finished products will be labeled with environmentally-friendly labels and properly packaged. The Quality Control Department will subsequently recheck the relevant labels and approve for storage if there are no further problems.

### 4. Exportation Control

The Logistics Department will arrange the delivery according to the specific delivery time, and check the item number, specification, label and packaging. If defective products such as broken pieces are found, a replacement application will be immediately submitted to the Quality Control Department for further processing.

### 5. After-sales Service Control

The Group is responsible for all products sold and provides comprehensive after-sales service. The Group has developed the "Operational Guidelines for Return Processing" (《退貨處理作 業指引》) to guide all returns processing practices. For more information, please refer to subsection "Customer Service and Satisfaction" under "Engaging Our Stakeholders" section.

In the rare case that a defective product is found, the Group will comply with the "Nonconformity Control Procedures" (《不合格控制程序》) and develop a report, screen all defective products with special labels, as well as immediately hold departmental meetings for further improvement. Depending on how serious the defect is, the Group will carry out further processing such as downcycles, repairs, returns and disposals. During the Reporting Period, there were no product recalls or returns involving safety and health reasons (2023: Nil).

## **Responsible Marketing**

The Group conducts limited advertising activities and therefore does not involve significant advertising-related risks. We strictly abide by the Advertising Law of the People's Republic of China, the Trademark Law of the People's Republic of China and other relevant laws and regulations. All information about the Group's products and businesses is subject to strict review before it is made public to eliminate any use of false information in advertising, promotion and exhibitions to mislead customers.

# **Engaging Our Stakeholders**

Employees are the Group's most valuable assets, Come Sure attributes its success to their support over the years. The Group adheres to the highest employment ethics and implements comprehensive talent development measures to build harmonious relationships with employees so that they can continue to give back to customers and the community with the Group. Furthermore, the Group place great importance on customer service and satisfaction, striving to provide excellent products and services to meet their needs and establish long-term partnerships. As a responsible company, the Group is committed to supporting community projects and initiatives, promoting sustainable development, and giving back to the community. Through its efforts in these key areas, the Group has established close collaborative relationships with its stakeholders, working together to achieve sustainable growth and shared prosperity.

# **Customer Service and Satisfaction**

As customers are one of the Group's key stakeholders, the Group strives to create and maintain close relationships with them to understand their specific needs and expectations. Therefore, the Group actively maintains various communication channels for open and honest feedback. As detailed in the "Customer Satisfaction Management Procedure" (《客戶滿意度管理程序》), the Group will biannually distribute customer satisfaction surveys to its customers and learn about their opinion on products and service quality, delivery efficiency, environmental fulfilment and overall competitiveness.

Upon receiving their feedback, the Group will develop "Customer Satisfaction Summary Report" (《客戶滿意度總結報告》), which serves as references for future improvement. On the rare occasion of receiving a satisfaction score lower than 50, the Marketing Department will carry out follow-up investigations to understand customers' expectations in a timely manner. Meanwhile, cross department communication will be conducted to prevent such cases from reoccurring.

During the Reporting Period, the customer survey results showed slight increase in customer satisfaction compared to 2023 and it is in line with the Group's annual average target (over 85 out of 100).

Target	2024 Score	2023 Score	Percentage Change
>85	91.56	90.49	+1.18%

The Group pays great attention to all customer complaints or dissatisfaction, and formulated the "Customer Complaint Handling Guidelines" (《客訴處理作業指引》) to instruct employees on how to handle complaints in a timely and professional manner. By thoroughly examining different functions and interests for the Group's departments, it clearly sets out corresponding guidelines for each department.

During the Reporting Period, the Group did not receive any material complaints related to the products and service provided (2023: Nil).



#### Marketing Department

- Receipt of complaint
   Registration
   Distribution and query from relevant divisions
- 4.Investigate improvement opportunities

Logistics Department Production Department Technical Department

- 1.Corrective action
- 2.Improvement of qualification status
- Investigate improvement opportunities

## **Employee Benefits**

The Group has set up "Human Resource Management Procedure" (《人力資源管理程序》). Under the leadership of the Administration Personnel Department and in coordination with other departments, the Group strives to improve employee satisfaction and cultivate talents in various ways.

With reference to the "Management System for Working Hours, Wages and Benefits" (《工時、 工資、福利控制管理制度》), the Group provides employees with comprehensive remuneration packages. In addition to annual leave, competitive remuneration, social and medical insurance, statutory holidays and other basic benefits that meet Chinese legal requirements, the Group also provides employees with allowances based on their academic qualifications, positions and work performance. The Group regularly reviews its compensation plans in accordance with the latest business conditions, market practices, and regulatory requirements to ensure that all plans are in line with the legitimate rights and interests of Come Sure and its employees.

## Health and Safety

Since a large number of production machines are involved in the manufacturing process of corrugated paperboard products, building a healthy and safe workplace for employees is the Group's top priority. To achieve this goal, the Group has developed the following management strategies:
# Environment, Health and Safety ("EHS") Management Committee and Machinery Safety Committee

Chaired by the management representatives from each department, the Group established the EHS Management Committee and Machinery Safety Committee to monitor to promote the Group's occupational health and safety performance.

- The Machinery Safety Committee
- Identify and assess the danger source of each work area, machinery and working environment
- Inspect and inform relevant division heads about occupational EHS issues
- Regularly hold occupational EHS meetings
- Prepare necessary safety procedures and provide employees with training on safety awareness, discipline and know-how

The EHS Management Committee

 Conduct risk assessment and safety analysis of on-site machineries
 Invite suppliers' technical team to demonstrate and train onsite employees on the safe operations of machinery and equipment for every new purchase

#### Production Safety Education and Training Management System

Recognizing the importance of the manufacturing process in the daily operation of the Group, it has formulated the "Production Safety Education and Training Management System" (《安全 生產教育培訓制度》). The Group provides technicians with three-level safety education training, including factory-level, workshop level and post-level to strengthen the safety awareness of technicians in the operation process.

#### Management System for Hazardous Energy Operations

The Group has formulated the "Management System for Hazardous Energy Operations" (《危險能源作業管理制度》) to standardize working processes and thereby avoiding explosions caused by hazardous energy.

- Before carrying out relevant work, operators must obtain approval from the safety officer and make preparations in advance, including transferring flammable materials, equipping with appropriate fire extinguishing equipment, and assigning on-site fire fighters
- Upon completion of work, on-site fire fighters should continue to monitor working stations for 30-60 minutes to prevent possible fire risks
- All gas cylinders and valves must be carefully protected and clearly labeled. The ambient temperature and space density of gas storage warehouses must be strictly controlled

#### Management System for Confined Space Operation Safety

To ensure employees' safety when they are working in confined spaces, the Group formulated the "Management System for Confined Space Operation Safety" (《有限空間作業安全管理制度》). According to the established system requirements, employees must ensure that the following requirements are met before entering confined spaces:

- Submit work application and obtain relevant permits in advance
- Assign emergency personnel outside the space and prepare first aid tools
- Detect safety indicators inside the space and make sure all values are within the safe range

#### **Emergency Rescue Management System**

The Group has an "Emergency Rescue Management System" (《應急救援管理制度》). For example, in the event of extreme weather conditions, relevant response guidelines have been listed in the emergency handling section of the "Employee Handbook" (《員工手冊》) to reduce its impact on the Group's business operations. For more information, please refer to subsection "Risk Mitigation" in section "Greening Our Operations".

The Group will regularly review these systems and measures to ensure their effectiveness. During the Reporting Period, the Group was not aware of any material 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.

# **Employee Physical and Mental Health**

Employees' well-being and sense of belonging to the Group directly reflects their resilience in face of challenges at work. During the Reporting Period, the Group issued the "Employee Satisfaction Survey Form" (《員工滿意度調查表》) to each department regularly, with an annual average score of approximately 92.40 points. The following are some improvement measures conducted based on suggestions raised by employees:

Focus Area	Improvement Methods
Dining	The problem has been reported to the canteen and is being gradually improving.
Employee Benefits	The Group will adjust its remuneration and benefits packages in a timely manner based on its operating conditions while making every effort to maintain the existing employee benefits.
Employee Training	The Group will collect and organize employees' individual training goals, develop training plans, and foster a learning-oriented company.

The Group also developed "Management System for Employee Complaint Handling" (《員工投 訴處理管理制度》), so that employees are able to directly reflect their opinions and requests to the management.

### **Development and Training**

The Group constantly strives for innovation, and it understands that the career development of its employees is the key to its progress. To this end, the Group has developed a comprehensive and diversified training program to train employees to become professional and innovative talents in the paperboard industry. First of all, according to "Employee Training Management Regulations" (《員工培訓管理規定》), the Group will provide employees with different trainings each year depending on their needs, including induction training, on-the-job training and special job training.

In addition, the Group has introduced "Project Hope Training Room", which regularly trains employees in professional attitude, production technology, quality management, customer service, fire safety and other aspects. The Group also cooperates with Shanxi University of Finance and Economics as well as other colleges and universities to entrust them with the cultivation of potential employees or management cadres to conduct talent exchanges.

## **Social Contribution**

The Group believes that corporate social responsibility is closely related to its business decisions. The Group has established policy related to community investment to cater for the specific needs of the community by understanding the needs of the community and identifying the focus areas from time to time, and allocate appropriate resources to empower the community. Come Sure is committed to focusing on neighbouring communities and striking a balance between economic development, social interests and human well-being. The Group has been actively involved in a variety of community activities in the past, including but not limited to donation of resources. During the Reporting Period, the Group donated RMB30,000 on the Guangdong Poverty Alleviation Day and Dongguan Charity Day to support the infrastructure projects in local community and give back to the community.

# **Policies and Legal Compliance**

#### **Greening Our Operations**

#### The Group's Official Policies

- 1. Greenhouse Gas Quantification Data Quality Management Procedures
- 2. Greenhouse Gas Quantification and Reporting Management Procedures
- 3. Control Procedures for Noise, Wastewater and Exhaust Gas
- 4. Energy Saving and Consumption Reduction Control Procedures
- 5. Resources and Energy Management Procedures
- 6. Hazardous Substances Management System
- 7. Management Procedures for Supervision and Measurement
- 8. Environmental Monitoring and Measurement Program
- 9. Non-Compliance, Corrective, and Preventive Measures Program
- 10. Risk Identification and Evaluation Form
- 11. Climate Change Policy
- 12. Procurement Control Procedures
- 13. Supplier Management Procedures
- 14. Annual Supplier Assessment Program

#### Laws and Regulations

- 15. Environmental Protection Law of the People's Republic of China
- 16. Law of the People's Republic of China on the Promotion of Clean Production
- 17. Energy Conservation Law of the People's Republic of China
- Law of the People's Republic of China on the Prevention and Control of Environmental Pollution by Solid Wastes
- 19. Law of the People's Republic of China on Environmental Impact Assessment
- 20. Class II criteria of the second period specified in Emission Limits of Air Pollution of Guangdong province (DB44/27-2001)
- 21. Class II criteria of the second period specified in Discharge Limits of Water Pollutants of Guangdong province (DB44/26-2001)
- 22. Emission Standard of Air Pollutants for Boilers of Guangdong province (DB44/765-2010)
- 23. Emission Standard of Volatile Organic Compounds for Printing Industry (DB44/815-2010)
- 24. Environmental Quality Standard for Noise (GB 3096-2008)
- 25. Notice of the General Office of the National Development and Reform Commission on Implementation of Carbon Emission Rights Trading Pilot Program
- 26. Type III standard under Standard of Noise for Industrial Enterprises at Boundary (GB12348-2008)
- 27. Notice of the State Council on Issuing the Work Plan for Greenhouse Gas Emission Control during the 12th Five-Year Plan Period

#### Sustaining Our Businesses

The Group's Official Policies

- 28. Business Ethics Standard Management System
- 29. Anti-Discrimination management system
- 30. Management System for the Protection of Female Employees During Pregnancy and Lactation Period
- 31. Employees Handbook
- 32. Child and Underage Labor Protection Management System
- 33. Non-Forced Labor Management System
- 34. Management System of Anti-Mental and Physical Abuse
- 35. Whistle-blowing Policy

#### Laws and Regulations

- 36. Bidding Law of the People's Republic of China
- 37. Interim Provisions on Banning Commercial Bribery
- 38. Anti-Money Laundering Law of the People's Republic of China
- 39. Anti-Unfair Competition Law of the People's Republic of China
- 40. Copyright Law of the People's Republic of China
- 41. Advertising Law of the People's Republic of China
- 42. Trademark Law of the People's Republic of China
- 43. Patent Law of the People's Republic of China
- 44. Prevention of Bribery Ordinance
- 45. Anti-Money Laundering and Counter-Terrorist Financing Ordinance

#### **Innovating Our Products**

The Group's Official Policies

- 46. Fire Safety Management System
- 47. Product Inspection Control Procedures
- 48. Corrective and Preventive Action Management Procedures
- 49. Non-conformity Control Procedures
- 50. Operational Guidelines for Incoming Inspection
- 51. Operational Guidelines on Inspection for Corrugated Paperboard Process
- 52. Product Inspection Standards
- 53. Operational Guidelines for Return Processing
- 54. Non-conformity Control Procedures

#### **Innovating Our Products**

Laws and Regulations

- 55. Product Quality Law of the People's Republic of China
- 56. Production Safety Law of the People's Republic of China
- 57. Regulations of Guangdong Province on Work Safety
- 58. Regulations on Supervision of Classification for Dust Hazards
- 59. Advertising Law of the People's Republic of China,
- 60. Trademark Law of the People's Republic of China

#### **Engaging Our Stakeholders**

The Group's Official Policies

- 61. Customer Satisfaction Management Procedure
- 62. Customer Complaint Handling Guidelines
- 63. Human Resource Management Procedure
- 64. Management System for Working Hours, Wages and Benefits
- 65. (Environment, Health and Safety) Management System
- 66. Management System on Investigation of Production Safety and Hidden Peril Governance
- 67. Facility Management Procedure
- 68. Management System for Hazardous Energy Operations
- 69. Management System for Confined Space Operation Safety
- 70. Emergency Rescue Management System
- 71. Management System for Employee Complaint Handling
- 72. Employee Training Management Regulations
- 73. Induction Training on Factory Discipline and Regulations
- 74. Production Safety Education and Training Management System

Laws and Regulations

- 75. Criminal Law of the People's Republic of China
- 76. Labor Law of the People's Republic of China
- 77. Labor Contract Law of the People's Republic of China
- 78. Law of the People's Republic of China on the Protection of Minors
- 79. Law of the People's Republic of China on the Protection of Women's Rights and Interests
- 80. Special Provisions on the Labor Protection of Female Employees
- 81. Provisions on the Prohibition of Using Child Labor
- 82. Provisions of the State Council on the Working Hours of Employees
- 83. Provisions on the Labor Rights and Interests Protection of Enterprise Employees in Guangdong Province

- 84. Regulation on Paid Annual Leave for Employees
- 85. Regulation on Public Holidays for National Annual Festivals and Memorial Days
- 86. Law of the People's Republic of China on the Prevention and Treatment of Occupational Diseases
- 87. Fire Control Law of the People's Republic of China
- 88. Guidelines for Risk Management of Occupational Noise Hazard
- 89. Management Rules for Labor Protection Products of Employers
- 90. Management Measures on Heatstroke Prevention
- 91. Provisions on Medical Treatment Period for Enterprise Employees Sick or Non-Work-Related Injuries
- 92. Provisions on the Administration of Occupational Health at Workplaces
- 93. Regulations on Safety, Labor and Health of Guangdong Province

# **Performance KPIs Statistics**

### **Environmental KPIs<sup>1</sup>**

		2022	2023		2024		
Description	Unit	Come Sure Environmental Protection	Come Sure Environmental Protection	Come Sure Environmental Protection	Wah Ming Environmental Protection	Total	
Exhaust Gas Emissi	Exhaust Gas Emissions <sup>2</sup>						
NOx	kg	2,814.64	552.37	1,152.76 <sup>3</sup>	59.26	1,212.02	
SOx	kg	96.53	22.53	34.82 <sup>3</sup>	0.16	34.98	
PM	kg	768.30	125.95	156.98 <sup>3</sup>	5.68	162.66	
GHG Emissions <sup>4</sup>							
GHG Emission (Scope 1) - Stationary	tCO <sub>2</sub> e	1,741.76	1,841.64	2,955.07 <sup>3</sup>	-	2,955.07	
GHG Emission (Scope 1) - Mobile	tCO <sub>2</sub> e	358.58	84.84	188.77 <sup>3</sup>	28.53	217.30	
GHG Emission (Scope 2) - Industrial	tCO <sub>2</sub> e	2,824.73	1,913.60	2,447.34 <sup>3</sup>	1,793.34	4,240.68	
Total GHG Emissions (Scope 1 & 2)	tCO <sub>2</sub> e	4,925.07	3,840.08	5,591.18 <sup>3</sup>	1,821.87	7,413.05	
GHG Emissions (Scope 1 & 2) Intensity by Revenue <sup>5</sup>	tCO <sub>2</sub> e / RMB'000	0.01	0.01	0.01	0.01	0.01	
GHG Emissions (Scope 1 & 2) Intensity by GFA <sup>6</sup>	tCO <sub>2</sub> e / m <sup>2</sup>	0.11	0.08	0.11	0.04	0.08	

<sup>1</sup> All figures are rounded up to 2 decimal places, except for the intensity of hazardous waste, which might lead to minor discrepancies when added up.

<sup>2</sup> The canteen stove has been excluded from exhaust gas emissions calculations as its individual emission factor was not measured. Exhaust gas emissions were calculated based on "How to prepare an ESG Report – Appendix 2: Reporting Guidance on Environmental KPIs" issued by the HKEx.

<sup>3</sup> Due to the significant increase in production by Come Sure Environmental Protection in 2024, there was a substantial rise in exhaust gas emissions, GHG emissions, energy consumption, and water usage resulting from production and transportation in 2024 compared to 2023.

<sup>4</sup> GHG emissions data are presented in terms of carbon dioxide equivalent and are based on, but not limited to, "The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standards" issued by the World Bank Institute and the World Business Council for Sustainable Development, "How to prepare an ESG Report – Appendix 2: Reporting Guidance on Environmental KPIs" issued by the HKEx, "Global Warming Potential Values" issued by the Intergovernmental Panel on Climate Change ("IPCC") Fifth Assessment Report and IPCC Sixth Assessment Report, "2006 IPCC Guidelines for National Greenhouse Gas Inventories" published by IPCC, the 2022 national power grid average emission factor as stated in the "Notice on the Management of Greenhouse Gas Emissions Reporting for the Power Generation Industry from 2023 to 2025" issued by the Office of the Ministry of Ecology and Environment of PRC.

PRC. <sup>5</sup> In 2024, Come Sure Environmental Protection has generated revenue of approximately RMB417,089,000.00 (2023: RMB 331,006,000.00, 2022: RMB 335,318,531.97), while Wah Ming Environmental Protection has generated revenue of approximately RMB171,723,000.00, totalling the revenue of approximately RMB 588,812,000.00. The same data is also used to calculate other intensity data.

<sup>6</sup> In 2024, the gross floor area of Come Sure Environmental Protection was approximately 51,482.00 m<sup>2</sup>. (2023: 46,717.00 m<sup>2</sup>, 2022: 46,717.00 m<sup>2</sup>), while the gross floor area of Wah Ming Environmental Protection was approximately 43,725.04 m<sup>2</sup>, totalling 95,207.04 m<sup>2</sup>. The same data is also used to calculate other intensity data.

		2022	2023		2024	
Description	Unit	Come Sure Environmental Protection	Come Sure Environmental Protection	Come Sure Environmental Protection	Wah Ming Environmental Protection	Total
GHG Emissions Intensity (Scope 1 & 2) by Production Volume <sup>7</sup>	tCO <sub>2</sub> e / Pieces'000	0.05	0.04	0.04	0.03	0.04
Energy <sup>8</sup>					•	•
Electricity Usage - Industrial	kWh	3,513,340.00	3,355,432.95	4,291,320.00 <sup>3</sup>	3,144,555.00	7,435,875.00
Natural Gas Usage	m <sup>3</sup>	805,549.00	870,990.00	1,397,578.00 <sup>3</sup>	-	1,397,578.00
Petroleum Usage	L	9,081.00	8,911.90	8,679.02	7,614.00	16,293.02
Diesel Usage	L	166,366.00	23,371.00	63,295.00 <sup>3</sup>	3,143.41	66,438.41
Total Energy Usage	MJ	50,791,102.58	46,085,523.49	70,812,020.73 <sup>3</sup>	11,707,162.76	82,519,183.49
Energy Intensity by Revenue	MJ / RMB'000	151.47	139.23	169.78	68.17	140.15
Energy Intensity by GFA	MJ / m <sup>2</sup>	1,087.21	986.48	1,375.47	267.75	866.73
Energy Intensity by Production Volume	MJ / Pieces'000	485.17	497.86	514.17	204.97	423.53
Water						
Water Consumption - Usage	m <sup>3</sup>	45,493.00	34,179.00	38,026.00 <sup>3</sup>	26,470.00	64,496.00
Water Consumption - Sewage	m <sup>3</sup>	39,123.98	34,179.00	38,026.00 <sup>3</sup>	26,470.00	64,496.00
Water Consumption (Usage) Intensity by Revenue	m <sup>3</sup> / RMB'000	0.14	0.10	0.09	0.15	0.11
Water Consumption (Usage) Intensity by GFA	m <sup>3</sup> / m <sup>2</sup>	0.97	0.73	0.74	0.61	0.68
Water Consumption (Usage) Intensity by Production Volume	m <sup>3</sup> / Pieces'000	0.43	0.37	0.28	0.46	0.33
Waste	Waste					
Hazardous Waste9	Tonnes	0.84	0.20	10.40	37.74	48.14
Hazardous Waste Intensity by Production Volume	kg / Pieces'000	0.010	0.002	0.076	0.661	0.247
Recyclable Waste <sup>10</sup>	Tonnes	4,805.90	5,622.74	7,726.74	2,500.45	10,227.19

<sup>&</sup>lt;sup>7</sup> In 2024, the production volume of Come Sure Environmental Protection was approximately 137,722,237.00 pieces (2023: 92,567,000.00 pieces, 2022: 104,687,177.00 pieces), while the production volume of Wah Ming Environmental Protection was approximately 57,115,852.00 pieces, totalling 194,838,089.00 pieces. The same data is also used to calculate other intensity data.
<sup>8</sup> The unit conversion method of energy consumption data is based on the "Energy Statistic Manual" issued by the International Energy

Agency. <sup>9</sup> Hazardous waste includes waste ink pails, waste rags, waste motor oil, waste activated carbon, and waste ink sludge. As Come Sure Environmental Protection improved its data collection system in 2024, which included the waste ink sludge into the hazardous waste statistics, the total amount of hazardous waste in 2024 increased significantly compared to 2023.

waste statistics, the total amount of hazardous waste in 2024 increased significantly compared to 2023. <sup>10</sup> Recyclable waste includes waste paper, food waste, office waste, and general solid waste. Due to the increase in production, the amount of waste paper increased significantly, resulting in a substantial rise in the total amount of recyclable waste in 2024 compared to 2023.

		2022	2023		2024	
Description	Unit	Come Sure Environmental Protection	Come Sure Environmental Protection	Come Sure Environmental Protection	Wah Ming Environmental Protection	Total
Recyclable Waste Intensity by Production Volume	kg / Pieces'000	45.91	60.74	56.10	43.78	52.49
Raw Materials						
Raw Paper	Tonnes	46,570.93	46,381.00	77,121.65	4,523.64	81,645.29
Corrugated Paper	Tonnes	-	-	-	4,622.06	4,622.06
Paper Box	Tonnes	-	-	-	5,422.87	5,422.87
Chemical Solvent	Tonnes	-	-	-	35.93	35.93
Printing Coating <sup>11</sup>	Tonnes	125.24	90.97	112.33	54.86	167.19
Adhesives <sup>12</sup>	Tonnes	833.78	808.29	1,349.95	177.41	1,527.36
Stitching Wire	Tonnes	55.35	36.21	64.07	-	64.07
Total Raw Material Consumption	Tonnes	47,585.30	47,316.47	78,648.00	14,836.77	93,484.77
Raw Material Consumption Intensity by Production Volume	kg / Pieces'000	454.55	511.16	571.06	259.77	479.81
Packaging Materials						
Pallet Film	Tonnes	17.40	17.99	21.16	15.12	36.28
Packaging Strap	Tonnes	11.65	11.73	14.89	2.09	16.98
Total Packaging Material Consumption	Tonnes	29.05	29.72	36.05	17.21	53.26
Packaging Material Consumption Intensity by Production Volume	kg / Pieces'000	0.28	0.32	0.26	0.30	0.27
Ratio of Raw Material to Packaging Material	Tonnes : kg	1 : 0.61	1 : 0.63	1 : 0.46	1:1.16	1:0.57

<sup>&</sup>lt;sup>11</sup> Printing coatings include inks, water-based oils, varnishes and top coatings. As Wah Ming Environmental has been included in the scope of reporting since 2024 and its business involves a wider range of printing coatings, the data of inks in previous years have been included and disclosed in the statistics of printing coatings.
<sup>12</sup> Adhesives include starch, white emulsion, adhesive glue and adhesive powder. As Wah Ming Environmental has been included in the scope of reporting since 2024 and its business involves a wider range of adhesives, data on starches and white glue emulsion in the scope of reporting since 2024 and its business involves a wider range of adhesives, data on starches and white glue emulsion in previous years have been included and disclosed in the statistics of printing coatings.

previous years have been included and disclosed in the statistics of adhesives.

### **Social KPIs**

		2022	2023		2024		
Description	Unit	Come Sure Environmental Protection	Come Sure Environmental Protection	Come Sure Environmental Protection	Wah Ming Environmental Protection	Total	
Workforce							
Total Workforce	Person	483	378	379	249	628	
Workforce by Gender							
Male	Person	348	273	293	165	458	
Female	Person	135	105	86	84	170	
Ratio of Male to Female Employee	-	2.58 : 1	2.60 : 1	3.41 : 1	1.96 : 1	2.69 : 1	
Workforce by Age Gro	ир						
<30	Person	62	50	39	35	74	
30 - 40	Person	121	94	96	87	183	
41 - 50	Person	208	145	150	93	243	
>50	Person	92	89	94	34	128	
Workforce by Employn	nent Category						
Executives	Person	1	1	1	1	2	
Senior Management	Person	28	20	17	5	22	
Middle Management	Person	47	35	10	20	30	
General Employee	Person	407	322	351	223	574	
Turnover Rate and Ra	te of New Emplo	oyees					
Total Turnover Rate <sup>13</sup>	%	27.91	33.33	19.19	36.15	26.89	
Rate of New Employees <sup>14</sup>	%	43.77	18.18	19.36	35.99	26.89	
Turnover Rate by Gen	der <sup>13</sup>						
Male	%	41.38	33.90	16.05	33.73	23.41	
Female	%	31.85	31.82	28.33	40.43	34.87	
Turnover Rate by Age	Turnover Rate by Age <sup>13</sup>						
<30	%	79.03	43.18	37.10	59.30	50.00	
30 - 40	%	43.80	30.37	17.24	40.41	30.15	
41 - 50	%	30.29	36.12	16.67	24.39	19.80	
>50	%	23.91	23.93	15.32	2.86	12.33	

<sup>&</sup>lt;sup>13</sup> The calculation of turnover rate is based on the following formula: Turnover rate (per category) =  $(L(x) \div (E(x) + L(x))) \times 100\%$  L(x) = Number of employees (of the specified category) leaving employment during the relevant reporting period E(x) = Number of employees (of the specified category) as of the last day of the relevant reporting period. <sup>14</sup> The calculation of percentage of new employees is based on the following formula: Percentage of new employees =  $(N(x) \div (E(x) + N(x))) \times 100\%$  N(x) = Number of new employees during the relevant reporting period E(x) = Number of employees as of the last day of the relevant reporting period.

		2022	2023		2024	
Description	Unit	Come Sure Environmental Protection	Come Sure Environmental Protection	Come Sure Environmental Protection	Wah Ming Environmental Protection	Total
Turnover Rate by Emp	loyment Catego	ry <sup>13</sup>				
Executives	%	-	-	-	-	-
Senior Management	%	7.14	25.93	19.05	-	15.38
Middle Management	%	6.38	27.08	73.68	4.76	49.15
General Employee	%	44.72	34.42	14.18	38.57	25.65
Training						
Total Trained Employees	Person	483	378	379	242	621
Percentage of Trained Employees <sup>15</sup>	%	100.00	100.00	100.00	97.19	98.89
Total Training Hours	Hour(s)	5,536.00	2,971.00	2,708.00	3,000.00	5,708.00
Average Training Hours per Employee <sup>16</sup>	Hour(s)	11.46	7.86	7.15	12.40	9.19
Percentage of Trained	Employees by (	Gender <sup>15</sup>				
Male	%	100.00	100.00	100.00	96.97	98.91
Female	%	100.00	100.00	100.00	97.62	98.82
Percentage of Trained	Employees by I	Employment Cate	gory <sup>15</sup>			
Executives	%	100.00	100.00	100.00	-	50.00
Senior Management	%	100.00	100.00	100.00	100.00	100.00
Middle Management	%	100.00	100.00	100.00	100.00	100.00
General Employee	%	100.00	100.00	100.00	97.31	98.95
Average Training Hour	rs by Gender <sup>16</sup>					
Male	Hour(s)	11.46	7.86	7.15	12.23	8.94
Female	Hour(s)	11.46	7.86	7.14	12.73	9.87
Average Training Hour	s by Employme	nt Category <sup>16</sup>				
Executives	Hour(s)	1.00	1.00	1.00	-	1.00
Senior Management	Hour(s)	11.46	7.85	7.12	26.40	11.50
Middle Management	Hour(s)	11.47	7.86	7.10	13.20	11.17
General Employee	Hour(s)	11.49	7.88	7.17	12.00	9.01
Work Injury						
Number of Work Injury	Case(s)	1	-	2	2	4

<sup>15</sup> The calculation of percentage of trained employees is based on the following formula: Percentage of trained employees =  $(T(x) + E(x)) \times 100\%$ T(x) = Number of trained employees during the relevant reporting period E(x) = Number of employees as of the last day of the relevant reporting period. <sup>16</sup> The calculation of average training hours per employee is based on the following formula: Average training hours per employee (per category) = TH(x) + E(x) TH(x) = Training hours of (specific category) employees during the relevant reporting period E(x) = Number of trained employees (specific category) as of the last day of the relevant reporting period.

		2022	2023		2024	
Description	Unit	Come Sure Environmental Protection	Come Sure Environmental Protection	Come Sure Environmental Protection	Wah Ming Environmental Protection	Total
Lost Days due to Work Injury	Day(s)	36.00	-	200	4	204
Rate of Lost Days due to Work Injury <sup>17</sup>	Day/100 Employees/ Year	7.73	-	52.98	1.61	32.61
Number of Work- related Fatality	Case(s)	-	-	-	-	-
Supplier						
Supplier by Geographical Region (PRC)	No.	11	17	8	37	45
Donation						
Volunteer Hours	Hour(s)	336.00	8.00	-	-	-
Donation <sup>18</sup>	RMB	N/A	20,000.00	20,000.00	10,000.00	30,000.00

<sup>&</sup>lt;sup>17</sup> In order to improve the accuracy and comparability of data, the Group has revised the definition and calculation of the rate of lost days due to work injury and has therefore restated the 2022 data. Under the new definition, the rate of lost days due to work injury represents the number of injuries per 100 employees per year. It is calculated as "total number of injuries multiplied by 200,000 and then divided by total hours worked".
<sup>18</sup> The data has been disclosed from 2023.

# HKEx ESG Reporting Guide Content Index

Aspects, General Disclosures and KPIs	Description	Relevant Chapter or Explanation
Mandatory Disclosure Requi	rements	
Governance Structure		
	A statement from the board containing the following elements: i) a disclosure of the board's oversight of ESG issues; ii) the board's ESG management approach and strategy, including the process used to evaluate, prioritise and manage material ESG-related issues (including risks to the issuer's businesses); and iii) how the board reviews progress made against ESG-related goals and targets with an explanation of how they relate to the issuer's businesses	<ul> <li>Come Sure's Sustainable Development Blueprint</li> <li>ESG Strategy</li> <li>Stakeholder Engagement</li> <li>Materiality Assessment</li> </ul>
Reporting Principles		
	A description of, or an explanation on, the application of the following Reporting Principles in the preparation of the ESG Report: Materiality: The ESG report should disclose: (i) the process to identify and the criteria for the selection of material ESG factors; (ii) if a stakeholder engagement is conducted, a description of significant stakeholders identified, and the process and results of the issuer's stakeholder engagement. Quantitative: Information on the standards, methodologies, assumptions and/or calculation tools used, and source of conversion factors used, for the reporting of emissions/energy consumption (where applicable) should be disclosed. Consistency: The issuer should disclose in the ESG report any changes to the methods or KPIs used, or any other relevant factors affecting a meaningful comparison.	<ul> <li>Report Overview</li> <li>ESG Strategy</li> <li>Stakeholder Engagement</li> <li>Materiality Assessment</li> <li>Performance KPIs Statistics</li> </ul>
Reporting Boundary		
	A narrative explaining the reporting boundaries of the ESG report and describing the process used to identify which entities or operations are included in the ESG report. If there is a change in the scope, the issuer should explain the difference and reason for the change.	Report Overview

Aspects, General Disclosures and KPIs	Description	Relevant Chapter or Explanation
A. Environmental		
Aspect A1: Emissions		
General Disclosure	Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to air and greenhouse gas emissions, discharges into water and land, and generation of hazardous and non- hazardous waste.	<ul> <li>Greening Our Operations</li> <li>Exhaust Gas and GHG Emission Control</li> <li>Waste Treatment and Reduction</li> <li>Risk Mitigation</li> </ul>
	Note: Air emissions include NOx, SOx, and other pollutants regulated under national laws and regulations. Greenhouse gases include carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons and sulphur hexafluoride.	<ul> <li>Policies and Legal Compliance</li> </ul>
	Hazardous wastes are those defined by national regulations.	
KPI A1.1	The types of emissions and respective emissions data.	<ul> <li>Greening Our Operations</li> <li>Exhaust Gas and GHG Emission Control - GHG Emissions, Air, Noise and Sewage Emissions</li> </ul>
		<ul> <li>Performance KPIs Statistics</li> <li>Environmental KPIs</li> </ul>
KPI A1.2	Direct (Scope 1) and energy indirect (Scope 2) greenhouse gas emissions (in tonnes) and, where appropriate, intensity (e.g. per unit of production volume, per facility).	<ul> <li>Performance KPIs Statistics</li> <li>Environmental KPIs</li> </ul>
KPI A1.3	Total hazardous waste produced (in tonnes) and, where appropriate, intensity (e.g. per unit of production volume, per facility).	<ul> <li>Performance KPIs Statistics</li> <li>Environmental KPIs</li> </ul>
KPI A1.4	Total non-hazardous waste produced (in tonnes) and, where appropriate, intensity (e.g. per unit of production volume, per facility).	<ul> <li>Performance KPIs Statistics</li> <li>Environmental KPIs</li> </ul>
KPI A1.5	Description of emissions target(s) set and steps taken to achieve them.	<ul> <li>Greening Our Operations</li> <li>Exhaust Gas and GHG Emission Control - GHG Emissions, Air, Noise and Sewage Emissions</li> <li>Risk Mitigation</li> <li>Environmental Targets</li> </ul>

Aspects, General Disclosures and KPIs	Description	Relevant Chapter or Explanation
KPI A1.6	Description of how hazardous and non-hazardous wastes are handled, and a description of reduction target(s) set and steps taken to achieve them.	<ul> <li>Greening Our Operations</li> <li>Waste Treatment and Reduction - Hazardous Substances and Waste, Non-hazardous Waste</li> <li>Risk Mitigation</li> <li>Environmental Targets</li> </ul>
Aspect A2: Use of Resource	s	
General Disclosure	Policies on the efficient use of resources, including energy, water and other raw materials. Note: Resources may be used in production, in storage, transportation, in buildings, electronic equipment, etc.	<ul> <li>Greening Our Operations</li> <li>Reduction, Reuse and Recycling of Materials</li> <li>Efficient Consumption of Resources</li> <li>Policies and Legal Compliance</li> </ul>
KPI A2.1	Direct and/or indirect energy consumption by type (e.g. electricity, gas or oil) in total (kWh in '000s) and intensity (e.g. per unit of production volume, per facility).	<ul> <li>Performance KPIs Statistics</li> <li>Environmental KPIs</li> </ul>
KPI A2.2	Water consumption in total and intensity (e.g. per unit of production volume, per facility).	Performance KPIs Statistics     Environmental KPIs
KPI A2.3	Description of energy use efficiency target(s) set and steps taken to achieve them.	<ul> <li>Greening Our Operations</li> <li>Efficient Consumption of Resources</li> <li>Risk Mitigation</li> <li>Environmental Targets</li> </ul>
KPI A2.4	Description of whether there is any issue in sourcing water that is fit for purpose, water efficiency target(s) set and steps taken to achieve them.	<ul> <li>Greening Our Operations</li> <li>Efficient Consumption of Resources</li> <li>Risk Mitigation</li> <li>Environmental Targets</li> </ul>
KPI A2.5	Total packaging material used for finished products (in tonnes) and, if applicable, with reference to per unit produced.	Performance KPIs Statistics     Environmental KPIs
Aspect A3: The Environmen	t and Natural Resources	
General Disclosure	Policies on minimising the issuer's significant impacts on the environment and natural resources.	<ul> <li>Greening Our Operations</li> <li>Responsible Procurement</li> <li>Reduction, Reuse and Recycling of Materials</li> <li>Efficient Consumption of Resources</li> <li>Exhaust Gas and GHG Emissions Control</li> <li>Policies and Legal Compliance</li> </ul>

Aspects, General Disclosures and KPIs	Description	Relevant Chapter or Explanation
KPI A3.1	Description of the significant impacts of activities on the environment and natural resources and the actions taken to manage them.	<ul> <li>Greening Our Operations</li> <li>Responsible Procurement</li> <li>Reduction, Reuse and Recycling of Materials</li> <li>Efficient Consumption of Resources</li> <li>Exhaust Gas and GHG Emission Control</li> </ul>
Aspect A4: Climate Change		
General Disclosure	Policies on identification and mitigation of significant climate- related issues which have impacted, and those which may impact, the issuer.	<ul> <li>Greening Our Operations</li> <li>Risk Mitigation - Climate Change</li> </ul>
KPI A4.1	Description of the significant climate-related issues which have impacted, and those which may impact, the issuer, and the actions taken to manage them.	<ul> <li>Greening Our Operations</li> <li>Risk Mitigation - Climate Change</li> </ul>

Aspects, General Disclosures and KPIs	Description	Relevant Chapter or Explanation
B. Social		
Employment and Labour Pra	actices	
Aspect B1: Employment		
General Disclosure	Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to compensation and dismissal, recruitment and promotion, working hours, rest periods, equal opportunity, diversity, anti-discrimination, and other benefits and welfare.	<ul> <li>Sustaining Our Businesses</li> <li>Fair Recruitment and Workforce Inclusion</li> <li>Engaging Our Stakeholders</li> <li>Employee Benefits</li> <li>Employee Physical and Mental Health</li> <li>Policies and Legal Compliance</li> </ul>
KPI B1.1	Total workforce by gender, employment type (for example, full- or part-time), age group and geographical region.	Performance KPIs Statistics     Social KPIs
KPI B1.2	Employee turnover rate by gender, age group and geographical region.	<ul><li>Performance KPIs Statistics</li><li>Social KPIs</li></ul>
Aspect B2: Health and Safe	ty	
General Disclosure	Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to providing a safe working environment and protecting employees from occupational hazards.	<ul> <li>Innovating Our Products</li> <li>Production and Fire Safety</li> <li>Engaging Our Stakeholders</li> <li>Health and Safety</li> <li>Employee Physical and Mental Health</li> <li>Policies and Legal Compliance</li> </ul>
KPI B2.1	Number and rate of work-related fatalities occurred in each of the past three years including the reporting year.	<ul><li>Performance KPIs Statistics</li><li>Social KPIs</li></ul>
KPI B2.2	Lost days due to work injury.	<ul><li>Performance KPIs Statistics</li><li>Social KPIs</li></ul>
KPI B2.3	Description of occupational health and safety measures adopted, and how they are implemented and monitored.	<ul> <li>Innovating Our Products</li> <li>Production and Fire Safety</li> <li>Engaging Our Stakeholders</li> <li>Health and Safety</li> </ul>

Aspects, General Disclosures and KPIs	Description	Relevant Chapter or Explanation		
Aspect B3: Development an	d Training			
General Disclosure	Policies on improving employees' knowledge and skills for discharging duties at work. Description of training activities.	<ul> <li>Engaging Our Stakeholders</li> <li>Development and Training</li> </ul>		
	Note: Training refers to vocational training. It may include internal and external courses paid by the employer.	<ul> <li>Policies and Legal Compliance</li> </ul>		
KPI B3.1	The percentage of employees trained by gender and employee category (e.g. senior management, middle management).	Performance KPIs Statistics     Social KPIs		
KPI B3.2	The average training hours completed per employee by gender and employee category.	<ul> <li>Performance KPIs Statistics</li> <li>Social KPIs</li> </ul>		
Aspect B4: Labour Standards				
General Disclosure	Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer	<ul> <li>Sustaining Our Businesses</li> <li>Preventing Child Labor and Forced Labor</li> </ul>		
	relating to preventing child and forced labour.	<ul> <li>Policies and Legal Compliance</li> </ul>		
KPI B4.1	Description of measures to review employment practices to avoid child and forced labour.	<ul> <li>Sustaining Our Businesses</li> <li>Preventing Child Labor and Forced Labor</li> </ul>		
KPI B4.2	Description of steps taken to eliminate such practices when discovered.	<ul> <li>Sustaining Our Businesses</li> <li>Preventing Child Labor and Forced Labor</li> </ul>		
Operating Practices				
Aspect B5: Supply Chain M	anagement			
General Disclosure	Policies on managing environmental and social risks of the supply chain.	Greening Our Operations     Responsible Procurement		
		<ul> <li>Policies and Legal Compliance</li> </ul>		
KPI B5.1	Number of suppliers by geographical region.	Performance KPIs Statistics     Social KPIs		
KPI B5.2	Description of practices relating to engaging suppliers, number of suppliers where the practices are being implemented, and how they are implemented and monitored.	<ul> <li>Greening Our Operations</li> <li>Responsible Procurement – Supplier Communication</li> </ul>		
KPI B5.3	Description of practices used to identify environmental and social risks along the supply chain, and how they are implemented and monitored.	Greening Our Operations     Responsible Procurement –     Supplier Communication		

Aspects, General Disclosures and KPIs	Description	Relevant Chapter or Explanation		
KPI B5.4	Description of practices used to promote environmentally preferable products and services when selecting suppliers, and how they are implemented and monitored.	<ul> <li>Greening Our Operations</li> <li>Responsible Procurement – Green Supply Chain</li> </ul>		
Aspect B6: Product Responsibility				
General Disclosure	Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to health and safety, advertising, labelling and privacy matters relating to products and services provided and methods of redress.	<ul> <li>Sustaining Our Businesses         <ul> <li>Industry Standards and Legal Compliance</li> <li>Data Privacy and Protection</li> <li>Respecting Intellectual Property Rights</li> </ul> </li> <li>Innovating Our Products         <ul> <li>Production and Fire Safety</li> <li>Product Quality Control and Assurance</li> <li>Responsible Marketing</li> </ul> </li> <li>Policies and Legal Compliance</li> </ul>		
KPI B6.1	Percentage of total products sold or shipped subject to recalls for safety and health reasons.	<ul> <li>Innovating Our Products</li> <li>Product Quality Control and Assurance</li> </ul>		
KPI B6.2	Number of products and service related complaints received and how they are dealt with.	<ul> <li>Engaging Our Stakeholders</li> <li>Customer Service and Satisfaction</li> </ul>		
KPI B6.3	Description of practices relating to observing and protecting intellectual property rights.	<ul> <li>Sustaining Our Businesses</li> <li>Respecting Intellectual Property Rights</li> </ul>		
KPI B6.4	Description of quality assurance process and recall procedures.	<ul> <li>Innovating Our Products</li> <li>Product Quality Control and Assurance</li> </ul>		
KPI B6.5	Description of consumer data protection and privacy policies, and how they are implemented and monitored.	<ul> <li>Sustaining Our Businesses</li> <li>Data Privacy and Protection</li> </ul>		
Aspect B7: Anti-corruption				
General Disclosure	Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to bribery, extortion, fraud and money	<ul> <li>Sustaining Our Businesses</li> <li>Anti-corruption</li> <li>Policies and Legal</li> </ul>		
	relating to bribery, extortion, fraud and money laundering.	Compliance		
KPI B7.1	Number of concluded legal cases regarding corrupt practices brought against the issuer or its employees during the reporting period and the outcomes of the cases.	<ul> <li>Sustaining Our Businesses</li> <li>Anti-corruption</li> </ul>		

Aspects, General Disclosures and KPIs	Description	Relevant Chapter or Explanation		
KPI B7.2	Description of preventive measures and whistle-blowing procedures, and how they are implemented and monitored.	Sustaining Our Businesses     Anti-corruption		
KPI B7.3	Description of anti-corruption training provided to directors and staff.	<ul> <li>Sustaining Our Businesses</li> <li>Anti-corruption</li> </ul>		
Community				
Aspect B8: Community Investment				
General Disclosure	Policies on community engagement to understand the needs of the communities where the issuer operates and to ensure its activities take into consideration the communities' interests.	<ul><li>Engaging Our Stakeholders</li><li>Social Contribution</li></ul>		
		<ul> <li>Policies and Legal Compliance</li> </ul>		
KPI B8.1	Focus areas of contribution (e.g. education, environmental concerns, labour needs, health, culture, sport).	<ul> <li>Engaging Our Stakeholders</li> <li>Social Contribution</li> </ul>		
KPI B8.2	Resources contributed (e.g. money or time) to the focus area.	<ul> <li>Engaging Our Stakeholders</li> <li>Social Contribution</li> </ul>		
		<ul> <li>Performance KPIs Statistics</li> <li>Social KPIs</li> </ul>		