tom ®

TOM Group Limited

Incorporated in the Cayman Islands with Limited Liability
(Stock Code: 2383)

DRIVING
SUSTAINABLE CHANGE
THROUGH
COMMITMENT AND
STRATEGY

Sustainability Report **2024**

About TOM Group

TOM Group Limited (stock code: 2383) is a technology and media company listed on the Main Board of the Stock Exchange of Hong Kong. TOM Group has technology operations in Social Network and Mobile Internet, investments in E-Commerce, Fintech and Advanced Data Analytics sectors. In addition, its media businesses cover both publishing and advertising segments. Headquartered in Hong Kong, the Group has regional headquarters in Beijing and Taipei with approximately 1,100 employees. TOM Group is a member of CK Hutchison Holdings Limited.

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Company Overview

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TECHNOLOGY

MEDIA

Social Network

Publishing

Mobile Internet

Advertising

Investments

E-Commerce
Fintech
Advanced Data Analytics

Sustainability at a Glance

of TOM Group Limited and its subsidiaries ("Group" or "TOM Group")

Sustainability Governance

- Convened **two Sustainability Committee meetings** to discuss the development and implementation of the Group's sustainability-related matters.

- Reviewed and updated the Group's sustainability-related policies and **introduced new policies** to strengthen our sustainability governance.

Investing in our People

- Organised various activities in our corporate office, such as yoga and handcraft workshops, to **promote our employees' well-being**.

- Conducted a **biennial employee engagement survey**, and the results reveal an upward trend in overall scores, highlighting our dedication to fostering an engaging workforce.

Protecting the Environment

- Achieved a **7% year-on-year greenhouse gas ("GHG") emissions reduction** as part of our effort to protect the environment.

- Undertook a comprehensive process to identify the Group's **climate-related physical and transition risks and opportunities**.

Operating Ethically

- **100%** of our **directors and staff** attended **anti-corruption training**.

Serving the Community

- Encouraged our employees to participate in **"Skip Lunch Day"** and **"Dress Casual Day"** organised by The Community Chest to help and bring hope to disadvantage groups in the community.

- Donated **11 advertising spaces** to various organisations to raise awareness and foster public support and care for underprivileged communities.

Message from the
Chief Executive Officer

> " *Under the leadership of our Sustainability Committee, which I have the privilege of chairing, we have implemented a range of well-informed initiatives, all calibrated to achieve our sustainability objectives. We believe that growth and profitability should align with responsible social and environmental practices. To this end, we work to deploy our capital with impact and forge partnerships to tackle global challenges.* "

I am delighted to present TOM Group's fourth standalone Sustainability Report, which serves as a testament to our commitment to driving positive societal impact through sustainable business practices. As a leading provider of media and technology services headquartered in Hong Kong, with operational hubs in Taipei and Beijing, we deliver services to a diverse clientele, placing sustainability at the heart of our decision-making framework.

For several years, we have advanced sustainability across all facets of our operations. Under the leadership of our Sustainability Committee, which I have the privilege of chairing, we have implemented a range of well-informed initiatives, all calibrated to achieve our sustainability objectives. We believe that growth and profitability should align with responsible social and environmental practices. To this end, we work to deploy our capital with impact and forge partnerships to tackle global challenges.

We work alongside our stakeholders—including business partners, customers, employees, and community members—to bring our sustainability agenda to life. This report outlines our ongoing efforts to make the planet greener, while also highlighting our evolving role as a responsible and engaged employer.

Mitigating Risks to the Sustainable Economy

While technological advances and profitable investment opportunities have opened new doors, they have also introduced complex risks that threaten both business and societal stability. Among these risks, climate change, social inequalities, and governance issues stand out as our primary concerns due to their impacts on supply chains, resource availability, staff stability, and operational efficiency. These risks can have profound effects on our publishing operations, from disruptions in supply chains and changes in consumer behavior, to challenges in managing diversity and inclusion, and the increasing demand for transparent and accountable corporate governance. These challenges not only jeopardise the Group's immediate business interests but also our long-term security and sustainability. By addressing these risks comprehensively, we are working to strengthen our resilience and ensure sustainable growth.

In the Greater China region and beyond, we have witnessed firsthand the rising frequency and intensity of extreme weather events. From devastating storms and floods to prolonged heatwaves and droughts, the effects of climate change are no longer a future threat—they are a present reality. These environmental disruptions have far-reaching impacts, from disrupting supply chains and damaging infrastructure to threatening agricultural production and biodiversity. Furthermore, these events disproportionately affect vulnerable communities, exacerbating social inequalities and underscoring the pressing need for collective action.

For this reason, mitigating environmental risks and building resilience to climate change have become central pillars of our sustainability strategy. At TOM Group, we address these challenges directly by integrating climate risk management into our operations and decision-making. We actively collaborate with industry peers and global partners to find and implement solutions that not only reduce our environmental footprint but also contribute to a more adaptive and resilient economy for the future.

Managing Greenhouse Gas Emissions

Our impact may be smaller than that of industries and companies with a more direct influence on global sustainability, but we are committed to doing our part in alignment with the United Nations Sustainable Development Goals ("UNSDGs"). As part of our ESG strategy, the Group has implemented comprehensive policies and practices, along with specific targets for 2025, to optimise resource use and minimise our environmental footprint across all business operations. Through energy efficiency measures, we have achieved a 7% year-on-year GHG emissions reduction as part of our effort to protect the environment.

During the year, our Scope 2 GHG emissions decreased by 8% compared to 2023, continuing the trend since the Group committed to its sustainability goals. This progress results from our ongoing efforts to improve the energy efficiency of our data centers, which account for 79% of our total energy consumption. In 2024, we upgraded 6.4% of our data center servers, and currently, 72.9% of these servers are Energy Star-certified. We are aiming to increase that proportion to 90% by 2025. We are also applying the same standards to our network equipment and office computers.

Furthermore, the Group now publishes 46% of its books electronically, surpassing our 2025 target of 20%. Producing paper books requires cutting down trees, contributing to deforestation. By urging forward to e-publications, we can conserve thousands of trees and significantly reduce our carbon footprint. As the timelines for our environmental targets approach, we are committed to establishing new goals to further enhance our sustainability efforts.

Building a People-Focused Culture

At TOM Group, we are dedicated to creating a diverse and inclusive workplace where talent thrive. Recognising that our strength lies in the continuous growth of our employees, we've invested purposefully in their development. This year, we provided over 6,500 hours of training to equip our team with the essential skills for success.

Our commitment to employee well-being is reflected in our family-friendly initiatives and welfare programmes, which are designed to enhance the work environment. Our corporate office also organised various activities to promote our employees' well-being. We actively seek employee feedback through our biennial engagement survey, which has provided positive responses this year, confirming the effectiveness of our initiatives.

Gender diversity is a cornerstone of our recruitment and career development practices. With above-average female representation at all levels of the Group, we ensure equal opportunities for all employees. By championing a people-centric approach, we not only strengthen our workforce but also build a foundation for long-term success and innovation, attracting a diverse pool of talent and enhancing our organisational culture.

Benefiting Communities

Beyond our operations, we actively empower communities in the markets where we operate through our corporate social responsibility initiatives. As in previous years, we donated advertising space to various foundations and charities, including Children Are Us and the World Peace Association, as part of our community service efforts. Since 2005, we have been committed to promoting healthy reading habits among both children and adults from diverse social backgrounds.

Manifesting a Sustainable Future

On behalf of the Group, I want to express my heartfelt appreciation to our stakeholders for their unwavering support of our sustainability initiatives. As we move forward, TOM Group is dedicated to amplifying our efforts in creating a sustainable future, with a focus on delivering lasting value for all our stakeholders. Collectively, we can bring about positive change and build a better community and environment.

Yeung Kwok Mung
Chief Executive Officer/
Chairman of Sustainability Committee
Hong Kong, 10 March 2025

OUR APPROACH
TO SUSTAINABILITY

Sustainability is a key component of the Group's long-term business strategy, contributing to value creation and operational resilience.

TOM Group is committed to incorporating sustainability and corporate responsibility into every aspect of our business. This commitment is reflected in the comprehensive set of policies, guidelines, practices and benchmarks we have developed, along with our integration of sustainability principles into our daily operations and business decisions. The Sustainability Committee of the Group, led by the Chief Executive Officer, develops strategies to fulfil our sustainability vision and responsibilities, oversees the execution and holds itself accountable for the outcomes.

The Group has adopted a structured approach to sustainability by aligning its policies with relevant UNSDGs and focusing on four key areas: The Business, The People, The Community, and The Environment. These areas guide the Group's efforts to address sustainability challenges and opportunities within its operations.

Sustainability Governance

The Group firmly believes that robust governance is essential for effectively implementing our Group's overarching direction and strategy towards sustainability. Under our top-down sustainability governance structure, the Group's Sustainability Committee reports to the Board of Directors (the "Board"). The Sustainability Committee is chaired by Executive Director and Chief Executive Officer Mr. Yeung Kwok Mung and comprises Independent Non-Executive Director Dr. Fong Chi Wai, Alex and the Chief Financial Officer and Company Secretary Mr. Man Tak Cheung. At the Group's highest level, the Board oversees policy coordination and execution.

The Group's Sustainability Committee holds the following responsibilities:

- To propose and recommend to the Board on the Group's corporate social responsibility and sustainability objectives, strategies, priorities, initiatives and goals;

- To oversee, review and evaluate actions taken by the Group in furtherance of the corporate social responsibility and sustainability priorities and goals, including coordinating with the business divisions of the Group and ensuring that their operations and practices adhere to the relevant priorities and goals;

- To review and report to the Board on sustainability risks and opportunities;

- To monitor and review emerging corporate social responsibility and sustainability issues and trends that could impact the business operations and performance of the Group;

- To oversee and review the Group's corporate social responsibility and sustainability policies, practices, frameworks and management approach, and to recommend improvements;

- To consider the impact of the Company's corporate social responsibility and sustainability initiatives on its stakeholders, including employees, shareholders, local communities and the environment; and

- To review and advise the Board on the Company's public communication, disclosure and publications (including the Sustainability Report) as regards its corporate social responsibility and sustainability performance.

Please refer to the Terms of Reference of the Sustainability Committee for details.

To enhance governance and decision-making, members of the Sustainability Committee receive periodic training materials on sustainability trends and climate-related issues. During the year, they have received reading materials on ESG trends and insights which includes climate change and climate-related risks. To ensure they remain informed about the evolving regulatory requirements and industry practices, we will continue to explore various training opportunities focused on sustainability and climate-related issues.
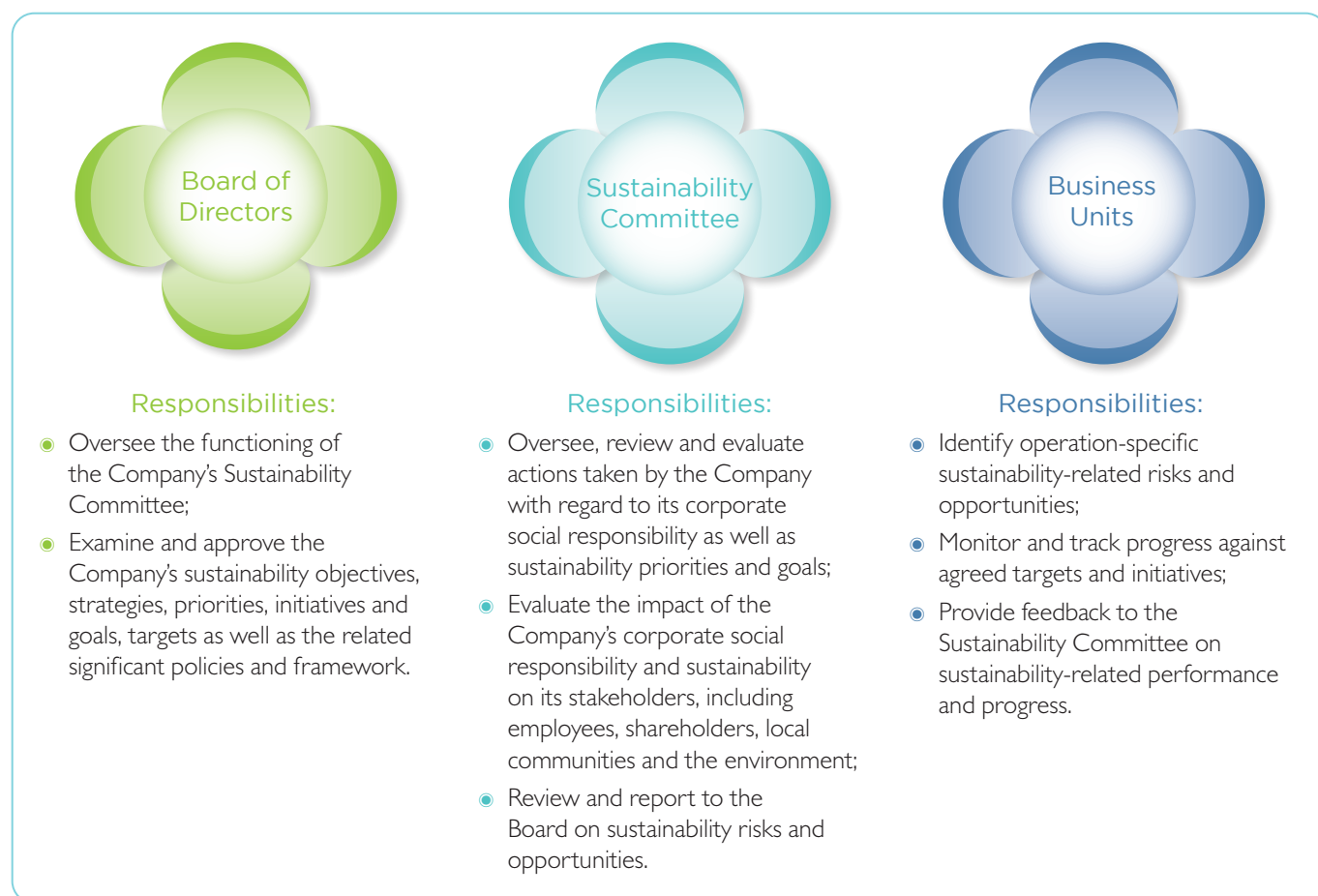
For the year ended 31 December 2024, the Sustainability Committee convened two meetings to discuss the development and implementation of the Group's sustainability-related matters, such as review of sustainability-related policies and target settings and understanding the key ESG trends and regulatory updates. Below is a summary of the work performed by the Sustainability Committee during the reporting period.

Sustainability-related work performed	March	August
Overseeing and reviewing the Group's corporate social responsibilities towards stakeholders, including its employees, shareholders, local communities and the environment	✓	✓
Reviewing and reporting to the Board on sustainability risks and opportunities facing the Group	✓	✓
Monitoring and reporting KPI updates on sustainability target	✓	✓
Reviewing the Group's sustainability-related policies	✓	✓

Illustrated below are the Company's sustainability governance structure and the responsibilities of the relevant parties:

Board of Directors

Responsibilities:

- Oversee the functioning of the Company's Sustainability Committee;
- Examine and approve the Company's sustainability objectives, strategies, priorities, initiatives and goals, targets as well as the related significant policies and framework.

Sustainability Committee

Responsibilities:

- Oversee, review and evaluate actions taken by the Company with regard to its corporate social responsibility as well as sustainability priorities and goals;
- Evaluate the impact of the Company's corporate social responsibility and sustainability on its stakeholders, including employees, shareholders, local communities and the environment;
- Review and report to the Board on sustainability risks and opportunities.

Business Units

Responsibilities:

- Identify operation-specific sustainability-related risks and opportunities;
- Monitor and track progress against agreed targets and initiatives;
- Provide feedback to the Sustainability Committee on sustainability-related performance and progress.

Biannually, the Group, through the Sustainability Governance and Management Assessment Questionnaire, collects feedback from our diverse sub-groups and business units regarding their sustainability concerns and risks encountered within our core operations. All our core business units are required to identify and assess the risks they face, and the relevant control measures implemented to manage these risks. Our Sustainability Committee reviews the outcomes of such self-assessment and then reports to the Board. The feedback received to date has been largely positive, highlighting the satisfactory level of governance and robust processes and systems to proactively manage material sustainability issues and risks across our business operations.

Additionally, the Group has explored investment opportunities in integrating Sustainability into our core operations and culture through various initiatives. In 2020, TOM Group invested in MioTech. MioTech leverages artificial intelligence and big data technologies to provide comprehensive ESG solutions including ESG data, real-time risk monitoring, ESG ratings, indices, as well as research and consulting services to financial institutions and listed companies in the Asia Pacific region.

Sustainability Policy

TOM Group has adopted a structured approach to embedding sustainability across our business operations. Our strategy is built around four key pillars: **The Business**, **The People, The Environment**, and **The Community**. These pillars guide all business units in aligning their efforts to create long-term sustainable value for stakeholders.

Every pillar is supported by Group-wide policies, corporate leadership and collaborative efforts across all our business units. These policies and guidelines provide a consistent framework for managing operational practices in line with the specific industries and regions in which the Group operates. To address sustainability challenges effectively, the Group has implemented a range of policies and processes that offer clear direction to the management.
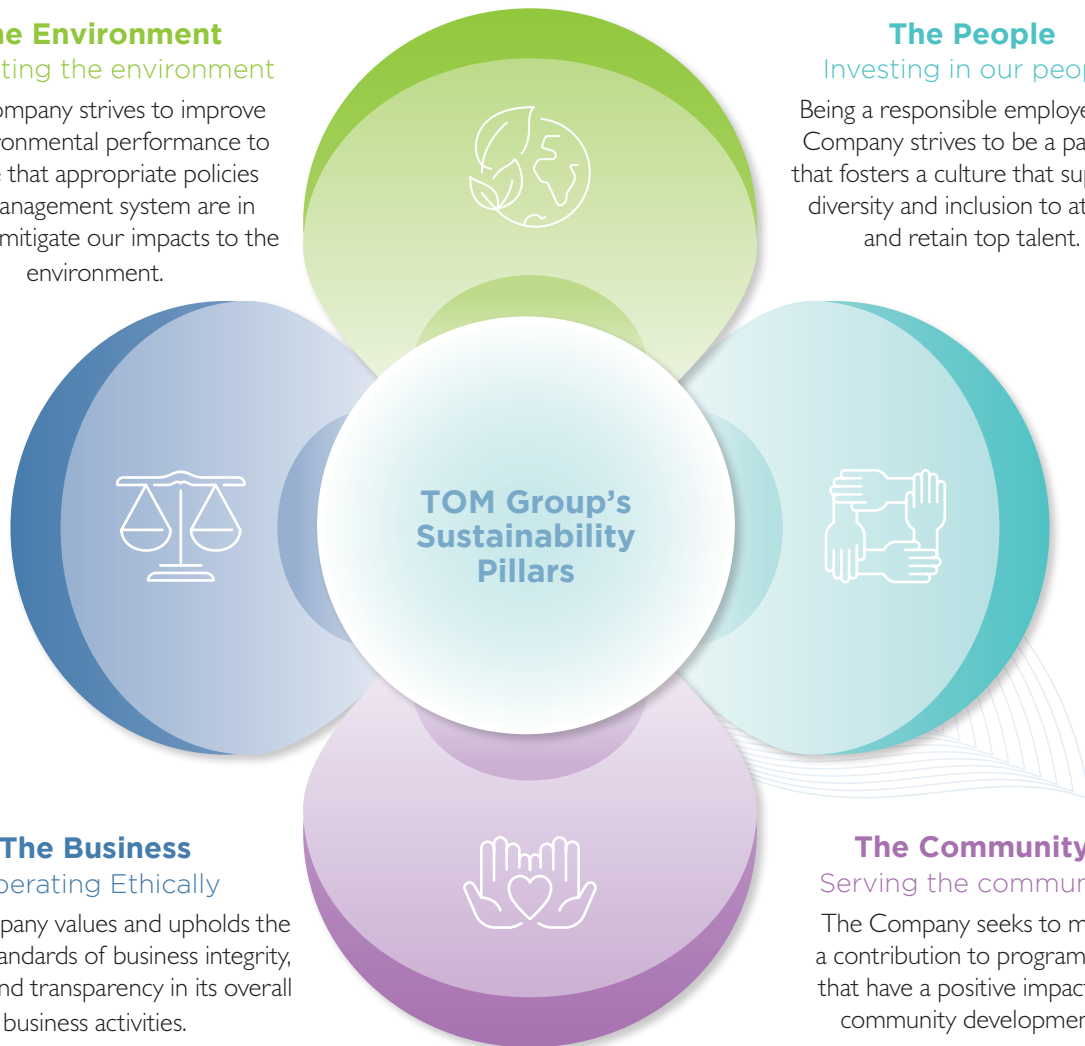
The Environment
Protecting the environment
The Company strives to improve its environmental performance to ensure that appropriate policies and management system are in place to mitigate our impacts to the environment.

The People
Investing in our people
Being a responsible employer, the Company strives to be a partner that fosters a culture that supports diversity and inclusion to attract and retain top talent.

TOM Group's Sustainability Pillars

The Business
Operating Ethically
The Company values and upholds the highest standards of business integrity, honesty and transparency in its overall business activities.

The Community
Serving the community
The Company seeks to make a contribution to programmes that have a positive impact on community development.

The Sustainability Committee plays a central role in overseeing these efforts by regularly reviewing and approving sustainability policies and their updates. These policies facilitate the Board's oversight of sustainability issues, as required under Appendix C2 to the Rules Governing the Listing of Securities on The Stock Exchange of Hong Kong Limited ("Listing Rules").

During the year, the Company reviewed and updated our sustainability-related policies and introduced new policies focusing on areas such as cybersecurity, artificial intelligence, and the procurement of computer software. These policies aim to strengthen operational security, encourage the responsible use of technology, and align software procurement practices with industry standards. Through these measures, we aim to safeguard our digital infrastructure while fostering innovation and ethical practices across the organisation.

Our corporate and sustainability policies are outlined below.

Polices and Company standards		
Environmental	**Social**	**Governance**
• Biodiversity Policy • Environmental Policy • Sustainability Policy	• Health and Safety Policy • Human Rights Policy • Modern Slavery and Human Trafficking Statement • Employment Policy • Corporate Communications Policy • Supplier Code of Conduct	• Code of Conduct • Anti-Fraud and Anti-Bribery Policy • Information Security Policy • Policy on Appointment of Third Party Representatives • Policy on Personal Data Governance • Whistleblowing Policy • Policy on Securities Dealings and Handling of Confidential and Price-sensitive Inside Information • Board Diversity Policy • Director Nomination Policy • Shareholders Communication Policy • Competition Compliance Policy • Policy on Financial Management and Procedures • Group Cyber Security Acceptable Use Policy • Group Cyber Security Incident Reporting Policy • Group Cyber Security Policy • Group Cyber Security Standard • Policy on Purchasing Computer Software, Hardware and Related Services • Policy on Reasonable and Ethical Procurement, Implementation and Use of Artificial Intelligence

UN Sustainable Development Goals

Launched by the United Nations in 2015, the UNSDGs provide a framework for achieving a more sustainable future by 2030. These goals also serve as a reference point for the Group to drive meaningful progress in sustainability. TOM Group acknowledges that aligning with the UNSDGs can deliver benefits not only to the global economy but also to businesses.

TOM Group has identified nine UNSDGs where our efforts can create the most significant impact. By working closely with our operating companies, we aim to effectively utilise our resources to contribute to these goals. Additionally, we strive to align our strategy with global sustainability priorities, ensuring transparent communication with stakeholders and peers about our initiatives in addressing pressing global challenges.

TOM Group's Sustainability Pillars	UNSDGs	Our Goals	Our Action
The Environment	11 SUSTAINABLE CITIES AND COMMUNITIES 12 RESPONSIBLE CONSUMPTION AND PRODUCTION 13 CLIMATE ACTION	Embed sustainability considerations in investments, projects and developments.	We have established a *Biodiversity Policy*, an *Environmental Policy* and a *Sustainability Policy* to reinforce our commitment to protecting the environment and supporting sustainable development by managing our environmental footprint across our business operations. We have also formulated environmental targets we aspire to achieve by 2025.

TOM Group's Sustainability Pillars	UNSDGs	Our Goals	Our Action
The People	**3** GOOD HEALTH AND WELL-BEING **4** QUALITY EDUCATION **5** GENDER EQUALITY **8** DECENT WORK AND ECONOMIC GROWTH **10** REDUCED INEQUALITIES	• Create an inclusive and diverse culture. • Promote learning and development initiatives in the workplace.	We have established a *Human Right Policy*, which is also addressed in the Group's *Code of Conduct* and *Modern Slavery and Human Trafficking Statement*. It articulates the Group's expectations regarding human rights. We also aim to create great places to work, and our *Sustainability Policy* highlights our commitment to diversity, training and development and providing a safe workplace. We have also conducted an employee engagement survey and organised different initiatives to promote the well-being of our employees.
The Business	**8** DECENT WORK AND ECONOMIC GROWTH **16** PEACE, JUSTICE AND STRONG INSTITUTIONS	• Provide systematic training and implement business plans on ethical practice.	We have established policies on *Personal Data Governance, Securities Dealing and Handling of Confidential and Price-sensitive Inside Information* to ensure our commitment to upholding high standards of business ethics across our operations and promoting equitable and inclusive societies for sustainable development.
The Community	**3** GOOD HEALTH AND WELL-BEING **4** QUALITY EDUCATION **8** DECENT WORK AND ECONOMIC GROWTH	• Engage with non-profit organisations to promote environmental awareness among underprivileged children via storytelling and craft workshop.	We have established a *Sustainability Policy* to consider relevant sustainability initiatives and programmes based on the needs of the place where we operate. Our *Corporate Communications Policy* also included a framework for handling incoming requests for corporate donation and sponsorship activities that positively impact community development.

Materiality Assessment

Understanding and addressing stakeholder expectations is critical for the Group's ability to adapt in a dynamic environment. We conduct materiality assessments to identify and prioritise the most relevant sustainability issues, which inform our business strategy and public disclosures.

The most recent extensive materiality assessment, completed in 2020, highlighted the key issues raised by stakeholders. Details of this process can be found in the ESG Report section of the Group's Annual Report 2020.

In response to the HKEX's new climate-related disclosure requirements, the Group conducted a climate risk assessment during the year. This assessment confirmed the relevance of climate change as a material issue, given its potential impacts on the Group's operations and long-term objectives. As a result, the Group has incorporated climate change as a new material topic within its sustainability framework, ensuring it is addressed through appropriate strategies. For more information, refer to the Climate Change and Resilience section of this Report.

The material sustainability issues identified include[1]:

	Technology Platform and Investments	Media Business
	Mobile Internet / Social Network	Publishing / Advertising
Environment		
Climate Change	✓	✓
Operational Eco-efficiency	✓	✓
Use of Resources		✓
Talent		
Human Capital Development	✓	✓
Operations		
Anti-corruption	✓	✓
Business ethics	✓	✓
Customer Privacy	✓	✓
Data Security	✓	✓
Intellectual Property Protection	✓	✓

In addition to the above, the Group also considers sustainability investment as an important part of the Group's sustainability initiatives.

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[1] Our scope of reporting will not cover business units and their business activities that the Group has no management control over.

INVESTING
IN OUR PEOPLE

3 GOOD HEALTH AND WELL-BEING

4 QUALITY EDUCATION

5 GENDER EQUALITY

8 DECENT WORK AND ECONOMIC GROWTH

10 REDUCED INEQUALITIES

At TOM Group, employees are a key priority. The Group is committed to fostering a diverse and inclusive workplace where talent can thrive. Employee rights and interests are safeguarded through workplace health management, training and career development programmes, and other incentives. The Group also ensures a secure, inclusive, and supportive environment for all employees.

Talent Attraction and Recruitment

Rationale

In the rapidly evolving technology industry, attracting and retaining top talent is a critical challenge and a material ESG issue. High employee turnover rates can impede innovation, disrupt business continuity, and erode competitiveness. At TOM Group, we recognise that our success depends on our ability to recruit, develop, and engage a diverse workforce with cutting-edge skills.

Our Commitment

To attract and retain talent, the Group offers a combination of competitive remuneration, equal employment opportunities and a supportive work environment. With approximately 1,100 employees across our operations in Greater China, the Group prioritises understanding workforce needs to cultivate engagement and loyalty. This is achieved through fair, transparent, and non-discriminatory employment practices. As a considerate and responsible employer, we uphold the following policies to protect the legitimate rights and interests of our employees:

Policy and Guideline	Expectations and Requirements
Employment Policy	◉ Adopts equal employment opportunity policies and maintaining programs so that employees are hired, promoted and assigned on the basis of their skills and abilities to do their jobs; and ◉ Non-discrimination policy continues throughout an employee's career and applies to all employee relations matters, including placement, transfer, promotion and compensation.
Human Rights Policy	◉ Prohibits the use of any form of child labour or forced labour, including prison labour, bonded labour, any form of slavery and any form of human trafficking.
Sustainability Policy	◉ Provides a positive work environment that values the wide-ranging perspectives inherent in its diverse workforce and fosters individual growth and achievement of business goals; ◉ Provides a positive work environment where people can grow and offering a wide range of training and development programs and interest courses and activities; ◉ Ensures internal equity and external competitiveness of staff remuneration and recognition; and ◉ Provides a safe workplace for all its employees.

How We Work

Recruit and retain talent

The ability of TOM Group to achieve excellence depends on the performance of our employees at every level. We provide comprehensive support to our staff, promoting their professional and personal development while ensuring the retention of our top talent to advance our long-term business objectives.

Recognising the risks associated with staff turnover and implementing measures to mitigate talent attrition rate is crucial for our ongoing business prosperity. High employee turnover not only escalates operational costs but also impacts revenue, productivity and customer experience. Besides, adequate staff retentive practices minimise the need to invest valuable time in screening, interviewing and training new candidates to fill the vacant positions.

The Group's recruitment and retention practices are guided by established policies, including a merit-based system where employees are hired, compensated, and promoted based on performance. Compensation packages are benchmarked against market standards and regularly adjusted to remain competitive. Benefits include health insurance, medical care, paid leave, and retirement pensions, all designed to motivate employees and demonstrate their value to the organisation.

Our *Employment Policy* highlights several major *Salary Policy* objectives, including:

- Ensure that the salary structure is competitive in the marketplace;
- Reward staff in accordance with the value of their contribution as measured by job worth and performance;
- Motivate staff to make full use of their abilities and to develop their potential and strive to achieve the objectives of their jobs and of the Division; and
- Provide staff with an opportunity for continuous career growth.

During the year, our Social Network and Publishing Groups have participated in campus recruitment events at various universities in Taiwan. Our Human Resources team and outstanding alumnus from these universities present the Group and the media industry to students. These initiatives allow students to gain valuable insights into the workplace before entering their careers, which could also help us attract the right talent and increase our visibility within these universities.

To retain valuable employees who contribute significantly to the Group, we implement strategies that ensure smooth operations and enhance team dynamics. For example, our Advertisement Group rehires retired employees, leveraging their experience and expertise to maintain continuity and stability within the team.

Staff Profiles at a Glance

FY2024 Total Number of Employee: **1,111**

By Gender
- 29% Male
- 71% Female

By Age Group
- 21% 50 or above
- 17% Below 30
- 62% 30 - 49

By Region
- 2% Other Countries
- 4% Hong Kong
- 4% Mainland China
- 90% Taiwan

By Employment Type
- 3% Part-time
- 97% Full-time
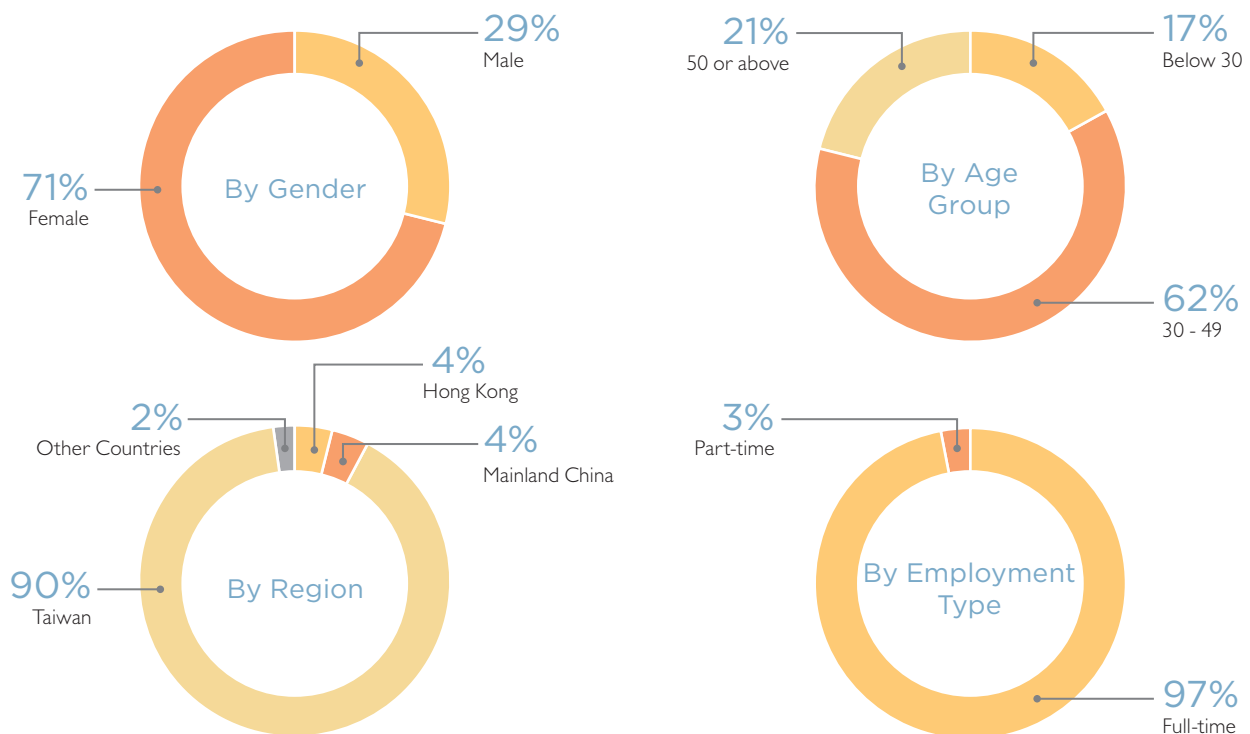
Employee Health and Safety

⊘ Rationale

The health and safety of our employees are top priorities for the Group. To enhance safety awareness and mitigate workplace hazards, the Group has implemented various initiatives aimed at creating a safe and supportive working environment. While striving to prevent accidents, the Group acknowledges that vigilance from both management and staff is essential.

🏆 Our Commitment

The Group is committed to offering our employees and other stakeholders a safe working environment. We have established a *Health and Safety Policy* that ensures a safe and supportive work environment that complies with all relevant laws and regulations in which we operate.

Our *Health and Safety Policy* highlights several major health and safety commitments, including:

- Complying with all applicable laws and regulations in the relevant jurisdictions;
- Meeting industry-specific standards or referencing relevant best practices;
- Adopting local or international health and safety guidelines for goods and services purchased;
- Maintaining a safe working place;
- Providing employees and contractors with guidelines or training and development specific to their job requirements;
- Assessing the health and safety performance of contractors and suppliers on a regular basis;
- Engaging employees and contractors through information sharing and programmes to improve their health and well-being; and soliciting feedback for continuous improvements;
- Monitoring and reporting health and safety performance;
- Providing adequate resources to implement with the Policy; and
- Enforcing the implementation of the Policy with regular reviews and internal audits.

0 **Work-related fatalities in the past three years**

129[2]

Lost days due to work injuries
(2023: 17)

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[2] The lost days due to work injuries in 2024 were mainly attributed to our employee's commute accidents. All incidents have been reported to local authorities for occupational assessment and appropriate follow-up.

⚙ How We Work

Protect our employees' physical health and safety

As part of our comprehensive employee benefits package, we offer company-wide health insurance coverage to all permanent staff. This ensures that our employees have access to quality medical services for work-related illnesses and injuries, as well as general health concerns. In addition, we provide annual health check-ups and a range of health awareness and safety training programmes to empower our employees to proactively manage their health.

In November 2024, we participated in a company-wide fire drill campaign at our corporate office to familiarise employees with the building's fire escape routes and protocols. The campaign included informative fire prevention talks and hands-on demonstrations on operating firefighting equipment. By participating in these drills and training sessions, our employees are well-prepared to respond quickly and safely in the event of a real emergency.

For our Social Network and Publishing Groups, all new employees are required to complete "General Safety and Health Training" before their start date. As part of the onboarding process, new hires are directed to a designated website to complete a two-hour online course, and they are required to submit proof of completion within ten days of joining the organisation. Throughout the year, a total of 191 new employees completed this training, accumulating 382 hours of learning.

Pursuant to the Labour Health Protection Regulation in Taiwan, our Social Network and Publishing Groups have hired medical specialists to provide health consultation services to employees. In 2024, these specialists conducted 1,927 health consultations and treated 591 physical injuries. They also organised six sessions of physical therapy exercise classes and two lectures on physical health, which were attended by a total of 246 participants.

Development and Retention

Rationale

At TOM Group, we recognise that having a skilled and agile workforce is crucial for the long-term sustainability of our business. As a result, we have implemented various training programmes to provide our employees with the necessary skills and capabilities to meet our expectations in their roles. This has enabled us to maintain a strong pool of versatile talents to meet industry competition, overcome a potential skills deficit and lower staff turnover.

Our Commitment

Despite the increasing costs associated with training, we remain committed to providing regular upskilling and reskilling opportunities for our employees. These initiatives include general and customised programmes and workshops tailored to their specific occupational needs. We believe that investing in employee development enhances productivity and creates additional value for customers and shareholders.

Provided over **6,500**[3] **hours** of training and development for employees
(2023: 9,900 hours)

How We Work

According to the Group's *Employment Policy*, each department or division is responsible for training its employees, and equipping them with job-specific technical and business skills. To ensure competence in their roles, we have organised a variety of course programmes, seminars, workshops and specialised training tailored to their needs. These training initiatives are offered based a need basis, enabling us to address any knowledge or skill gaps and ensure our employees possess the necessary competencies to excel in their respective positions. TOM Group also supports continuous education by offering all staff study and examination leave throughout the year.

Induction programme

At TOM Group, we have established a mandatory induction programme to welcome new employees and help them become acquainted with our organisation's operations, policies, objectives and culture. This orientation process aims to foster connections among new hires from different departments and provide them with the skills and knowledge essential for success in the workplace.

Skill-based training

We have also implemented training and development programmes to equip our employees with the skills and knowledge to adapt to changing job requirements. These initiatives promote staff proficiency in a range of general competencies, such as leadership, communication and time management, while enhancing their technical expertise relevant to specific tasks.

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[3] The decrease in training hours in 2024 compared to 2023 was primarily due to reduced demand for managerial development and skills-related training.
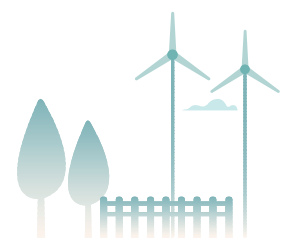
In 2024, our Social Network and Publishing Groups launched a series of both inhouse and external employee development programmes with the aim of immersing them in the following skills:

Training Courses

- Leadership
- Project Management
- Teamwork
- Compliance
- Technology
- Marketing
- Occupational Health
- Product Development

These training courses and events aim to broaden our employees' perspectives and experiences, providing them with the essential knowledge and skills needed to advance through different career stages and ascend the corporate ladder within the Group.

We also provide employees with access to external learning resources and platforms to support their continuous development. For example, our Publishing Group offered free accounts for employees to access the "Business Weekly Plus" mobile app. This platform provides over a hundred courses and collaborative learning opportunities with other professionals and experts in the field. Employees can access all articles published in Business Weekly magazine through this platform, enabling them to stay up-to-date with the latest industry trends and insights.

To support our employee's professional development, our Mobile Internet Group has provided continuing education opportunities for employees with specific qualifications to ensure the validity of their certifications and enhance their ability to deliver their work duties.

Succession planning

We implement succession planning within the Group to identify critical roles and establish a talent pipeline, preparing skilled and high-performing employees to fill key vacancies as their predecessors retire or move on.

For example, our Social Network and Publishing Groups conducted management training sessions on a regular basis to assist supervisory-level staff in cultivating and honing their leadership skills while improving their confidence for key managerial positions.

Workplace Well-being

⌕ Rationale

The Group recognises that workplace well-being is paramount to our long-term success. We prioritise our workforce's safety and health by continuously reviewing and improving our occupational health and safety protocols. This unwavering commitment cultivates a thriving environment that fosters employee satisfaction, engagement and productivity. By promoting well-being, the Group empowers our employees to flourish, positioning the Group for sustainable growth in an increasingly competitive landscape.

🏆 Our Commitment

At TOM Group, we are dedicated to empowering our employees and fostering a positive work environment that enables a healthy work-life balance. We understand the significance of this balance and have been actively implementing various initiatives to promote it, enabling our employees to flourish personally and professionally.

🧩 How We Work

Family-friendly initiatives

The Group priorities the mental and physical well-being of our employees. Like many other companies, we have implemented work-from-home arrangements for part of our workforce and offered flexible working options as needed. These measures are designed to support our employees, particularly those with caregiving responsibilities at home, enabling them to balance their professional and personal responsibilities, including caring for children and elderly dependents.

To foster a workplace culture prioritising empathy, the Group has introduced several family-friendly initiatives to support our employees in achieving a healthy work-life balance. These initiatives include paid time off for marriage, compassionate leave and the standard annual leave entitlements for all staff. Additionally, full-time employees at the Group's Taiwan office are entitled to up to seven days of family urgency leave each year, without affecting their performance evaluations or full-attendance bonuses. In 2024, a total of 18 employees from our Taiwan-based office took family urgency leave totalling 244.5 hours.

In line with the Act of Gender Employment, full-time staff of our Social Network and Publishing Groups in Taiwan are entitled to a discounted rate for childcare services, made possible by the Group's collaboration with educational groups. Moreover, in line with the national policy, full-time staff for our Advertising Group who are the only children and whose parents are over 60 years old are entitled to nursing leave for up to 15 days during hospitalisations. These initiatives allow our employees to balance their professional obligations with caregiving duties.

Promote employee's wellness in the workplace

Our corporate office has also implemented several initiatives to promote well-being among our staff. These initiatives include setting up a dedicated board game corner where employees can socialise and enjoy themselves during breaks, as well as providing a massage chair for employees to relax and relieve tension during the workday. Moreover, playing light music during lunch breaks helps employees to recharge and refresh their minds. The office has also organised engaging workshops to make the time spent at work more enjoyable. For example, it has organised a handcraft workshop and feng shui class to allow employees to unwind and cultivate a sense of harmony in the work environment. Additionally, a yoga workshop was led by a skilled instructor, which promoted relaxation and supported stress reduction among staff. It also hosted a private screening session, a festive Christmas lunch, and an annual dinner to strengthen connections among our employees and celebrate our achievements.

Diversity, Equality and Inclusion

Rationale

TOM Group firmly believes that embracing diversity is a key factor in the success of our business operations. A diverse workforce brings a wealth of perspectives and experiences, fostering creativity, innovation and a broader understanding of our markets. This inclusive environment not only enhances employee engagement and satisfaction but also strengthens our reputation and attracts a wider range of talent, ultimately driving our performance and impact.

Our Commitment

The Group is committed to promoting and protecting equal opportunities. In line with Group policies, we have zero tolerance towards discrimination based on race, gender, sexual orientation, or any other characteristics in the processes of recruitment and selection, performance evaluation, and promotion as well as in the provision of training and various welfare measures.

Our *Code of Conduct*, *Employment Policy* and *Human Rights Policy* clearly outline our commitments to promoting equal opportunities and valuing diversity. We also regularly review and update these policies to ensure continuous improvement and alignment with best practices and enforce anti-discrimination measures in our business operations to respect and promote diversity and inclusion.

We endeavour to cultivate a work environment that encourages employee involvement and fosters a culture of continuous improvement through open, two-way communication. We invite our employees to share their insights and opinions via various effective communication channels, ensuring their voices are heard and valued.

How We Work

Gender diversity and equality

Throughout the year, the Company has maintained female representation above market averages, with women comprising 28.6% of the Board, 47.4% of management, and 71.1% of the overall workforce. We are committed to ensuring that our female representation remains above the market average across all seniority levels.

To further promote gender diversity, we will continue to implement inclusive practices in our recruitment processes and are dedicated to providing equal opportunities for training and career development for our female employees. This commitment is essential for cultivating a strong pipeline of potential successors for the Board, thereby advancing gender equality within our workplace.

Employee engagement and workplace inclusion

TOM Group strives to foster a culture of inclusion by actively encouraging our employees to share their ideas, provide feedback and engage through initiatives such as employee engagement surveys.

To gain deeper insights into employee perspectives at the individual, team and organisational levels, the Company conducted a biennial employee engagement survey in July 2024. The findings are encouraging, showing an upward trend in overall scores, which reflects our ongoing commitment to enhancing employee engagement. This positive feedback underscores the effectiveness of our initiatives and reinforces our dedication to fostering a supportive and inclusive workplace culture.

Additionally, our Social Network and Publishing Groups in Taiwan have taken significant steps to promote inclusivity by providing job opportunities for three individuals with physical impairments. This practice not only exemplifies our commitment to inclusion but also enriches our workforce by embracing a wider range of talents and perspectives.

Regulatory Compliance

The Group has established preventive, monitoring and controlling measures to ensure compliance with relevant employment and labour laws and regulations. The Group is not aware of (i) any non-compliance with laws and regulations relating to employment and labour practices, occupational health and safety that have a significant impact on the Group; or (ii) any incident that has a significant impact on the Group relating to the use of child or forced labour during the reporting period.

PROTECTING
THE ENVIRONMENT

11 SUSTAINABLE CITIES AND COMMUNITIES

12 RESPONSIBLE CONSUMPTION AND PRODUCTION

13 CLIMATE ACTION

2025 Targets

🔍 Rationale

Our sustainable business model is fundamentally grounded in responsible environmental stewardship and the preservation of essential natural resources essential for societal well-being. As a technology and media company listed on the Main Board of the Hong Kong Stock Exchange, we recognise the crucial importance of minimising our environmental impact. This includes reducing our carbon footprint, conserving resources and mitigating the effects of climate change to ensure our long-term success. We comply with all applicable environmental laws and regulations in the jurisdictions where we operate. Furthermore, we have established comprehensive policies, practices and specific 2025 targets to address the climate change and optimise resource utilisation.

Looking beyond 2025, we will evaluate our existing targets and define new objectives to further enhance our environmental stewardship, aligning with evolving ESG landscape.

Focus area	Why it matters	2025 Targets	2024 Status
Climate change & energy	Our data centres account for more than 80% of our total energy consumption and are a focal company of our energy efficiency efforts.	Increase Energy Star Certified server to 90%.	6.4% of servers have been upgraded. Currently, 72.9% of the servers were Energy Star Certified.
		Increase Energy Star Certified network equipment to 85%.	7.8% of network equipment have been upgraded. Currently, 90.7% of the network equipment was Energy Star Certified.
		Increase Energy Star Certified office computers to 98%.	0.3% of computers have been upgraded. Currently, we have achieved the target, which 100% of the office computers were Energy Star Certified.
		Source IT equipment that are environmentally friendly.	– Ensure all IT procurement staffs follow the instruction of the Group's latest Green Procurement Standard – Budget application for IT procurement will only be approved if it complies to the Group's latest Green Procurement Standard
		Review IT procurement process regularly to incorporate sustainable procurement practices and establish sustainable procurement objectives.	EPA Energy Star included as a required component for the server, network equipment and office equipment.
Paper	Producing paper and publishing printed books requires cutting down trees and destroying forests. Replacing with e-books can help save millions sheets of paper and has less environmental impact.	Maintain to publish at least 20% of all book types electronically.	Published 46% of all book types electronically.
Packaging	A substantial source of our waste comes from the packaging materials used to protect the magazines and books when transporting them.	Aim at minimising the usage of virgin plastic by targeting to use a minimum of 80% recycled plastic content in plastic packaging by 2025, if supply allows.	Included in our procurement procedure to select suppliers who use recycled plastic content in plastic packing. Preference will be given to suppliers who use at least 70% recycled plastic content.

Operational Eco-efficiency

At TOM Group, we understand that optimising resource efficiency across our operations is crucial for sustainable growth. To foster a culture of environmental responsibility and encourage active participation from our stakeholders including customers, employees, suppliers and business partners, we have implemented a range of policies and initiatives designed to create a more environmentally sustainable operation.

Rationale

Our commitment to reducing our environmental footprint and enhancing eco-friendliness while maintaining productivity is driven by our emphasis on environmental preservation and energy efficiency. This guiding principle ensures that our investment decisions align with environmental sustainability. Furthermore, we actively promote environmental awareness among our employees and suppliers, encouraging their support and involvement to help us achieve our eco-efficiency targets by 2025.

Our Commitment

Although our printing operation is relatively eco-friendly and non-polluting, we remain committed to integrating sustainable practices into the Group's culture. This involves consistently improving resource efficiency and reducing our carbon footprint. We engage and collaborate with suppliers, business partners, customers and independent third parties to bring our green vision to life.

By implementing policies and accountability mechanisms that ensure compliance with official green regulations, we have seamlessly integrated environmental protection and eco-efficiency into our routine operations. Our management prioritises the continuous training of the Group's compliance and regulatory professionals on the latest regulations, benchmarks and processes to effectively fulfil their responsibilities and stay abreast of regulatory changes.

Our *Environmental Policy* highlights the Group's goals and efforts to implement eco-efficiency in our daily operations, including:

- Increase the usage of innovative and energy-efficient technology in the Group's operations to reduce energy consumption arising from day-to-day operations, such as efficient lighting and controls, HVAC upgrades and data centre infrastructure improvements.

- Track and monitor the use of energy across the Group's operations.

How We Work

The Group has implemented clear environmental guidelines that outline the responsibilities of all employees in conserving energy and optimising the utilisation of natural resources.

For example, employees in the Publishing Group are required to turn off air conditioners if they are the last to leave the office. Supervisors are responsible for monitoring these actions to avoid unnecessary energy consumption.

We are increasingly adopting LED lighting in various areas, including workplaces, due to its substantial energy efficiency compared to conventional fixtures. Our Taoyuan warehouse in Taiwan has been equipped with LED lighting systems to effectively lower energy usage and associated costs.

In our procurement process, we prioritise selecting technical equipment with long service lifespans and energy-efficient features. Malfunctioning devices are either repaired for future use or donated to charitable organisations, and those that cannot be repaired will be properly disposed of.

To ensure the utilisation of the most energy-efficient electronic appliances, we are procuring IT equipment with Grade 1 energy labels under the Mandatory Energy Efficiency Labelling Scheme ("MEELs") for our corporate office.
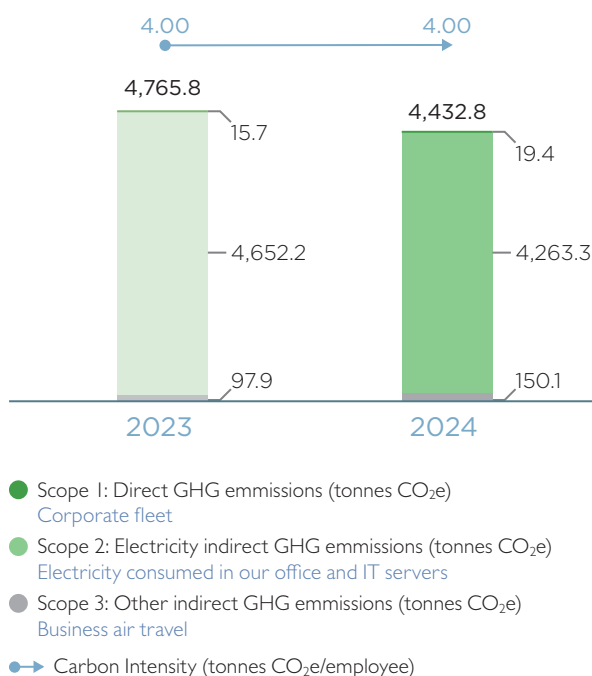
GHG and Energy Consumption Performance

The majority of the Group's carbon emissions originate from the daily operation of the office, IT and hardware equipment from our data centres, which support our businesses and internal use, as well as from the industrial printers used by our Publishing Group. In 2024, the Group's operations generated 4,432.8 tonnes of carbon dioxide equivalent ("tCO$_2$e"), representing a 7% reduction compared to the previous year.

Among the Group's GHG emissions, 4,263.3 tCO$_2$e were generated from electricity consumption, with Scope 2 emissions contributing to 96% of our total annual carbon emissions. This represents an 8% decrease in Scope 2 emissions compared to 2023, achieved through our efforts to improve energy efficiency. Additionally, Scope 3 emissions amounted to 150.1 tCO$_2$e, caused primarily by the increased air travel of our Publishing Group executives.
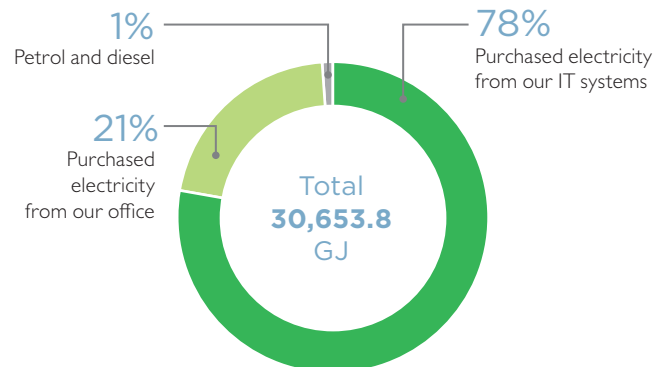
Energy consumption in our data centres accounted for about 79% of the Group's total operational energy consumption, contributing to 76% of our overall GHG emissions.

Continuing our journey towards a low-carbon future, the Group is committed to further enhancing and upgrading our hardware and dedicated engineering services to optimise energy consumption and reduce our GHG emissions.

Energy Consumption by Type

- 1% Petrol and diesel
- 21% Purchased electricity from our office
- 78% Purchased electricity from our IT systems
- Total 30,653.8 GJ

GHG Emissions and Carbon Intensity

	2023	2024
Carbon Intensity	4.00	4.00
Total	4,765.8	4,432.8
Scope 3	15.7	19.4
Scope 2	4,652.2	4,263.3
Scope 1	97.9	150.1

- ● Scope 1: Direct GHG emmissions (tonnes CO$_2$e)
  Corporate fleet
- ● Scope 2: Electricity indirect GHG emmissions (tonnes CO$_2$e)
  Electricity consumed in our office and IT servers
- ● Scope 3: Other indirect GHG emmissions (tonnes CO$_2$e)
  Business air travel
- ➡ Carbon Intensity (tonnes CO$_2$e/employee)

Use of Resources

🔍 Rationale

As environmental regulations become increasingly stringent, it is imperative for the Group to integrate environmental sustainability into our business operations.

TOM Group currently relies heavily on paper materials, a woodfiber-based renewable resource, to produce various publications such as paper magazines and books. In response to the growing concerns about deforestation and stricter government regulations on the use of paper pulp and other natural resources, we are developing more suitable publication solutions to improve resource efficiency and reduce operational expenses.

🏆 Our Commitment

As an environmentally responsible corporation, we recognise the importance of enhancing resource efficiency. Given the nature of our business, we do not generate any hazardous waste. Non-hazardous office waste is properly managed through waste separation and recycling facilities provided by our office building's property management team. Our Publishing Group's printers also handle wastepaper generated during the printing process in accordance with Taiwan's Waste Disposal Act.

Our *Environmental Policy* highlights several key waste management plans, including:

- ● Streamline procedures and processes to increase efficiency and reduce consumption of day-to-day operational inputs such as paper, electronic equipment and the like;
- ● Minimise the Group's waste footprint by recycling and reusing materials where possible and setting waste reduction and/or recycling targets where viable;
- ● Decrease the operational use of existing products while also sourcing from recycled or sustainable forest sources.

⬚ How We Work

The Group procures paper materials from reputable suppliers in the market, including Chung Hwa Pulp Corporation ("CHP") and Dayeh. CHP's fine paper products are certified with ISO14001 – Environmental Management and generally align with international standards. Dayeh supplies UPM paper from the world's leading supplier, which complies with the Restriction of Hazardous Substances ("RoHS") and Registration, Evaluation, Authorisation and Restriction of Chemicals ("REACH") standards set by the European Union.

In accordance with Taiwan's Waste Disposal Act, the wastepaper generated by our Publishing Group is subject to separation and recycling, along with other processing and disposal requirements. During the year, our Publishing Group published 15 books focused on sustainability, aiming to raise public awareness and offer practical solutions to incorporate sustainability practices into everyday life.

During the Lunar New Year 2024 period, our corporate office participated in a red packet recycling campaign to promote waste reduction by collecting unused red packets for donation to charity organisations or for recycling. Moreover, our corporate office also participated in an Annual Recycling Programme and donated 25 monitors and 18 notebooks to support environmental conservation and reduce electronic waste.
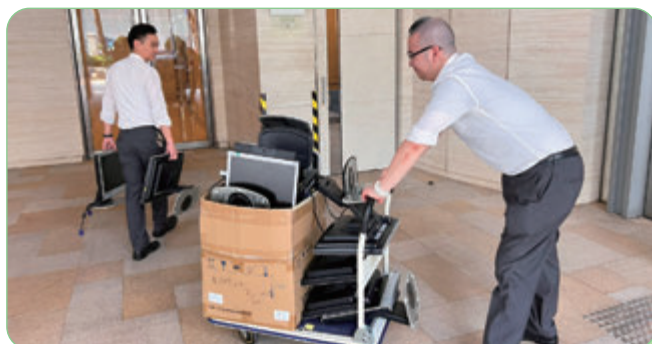
Climate Change and Resilience

Climate Risk Management Approach

Sustainability, including climate-related issues, is fully integrated into the Group's ERM framework. This integration is achieved through a bi-annual formal review process, where all business units assess their material sustainability risks and present their management plans to senior leadership. These reviews are part of the broader evaluation of risk management and internal control systems. The self-assessment results are subject to internal audits and are subsequently submitted biannually to the Chief Executive Officer and Chief Financial Officer. The Audit Committee and Sustainability Committee also review and approve these findings, ensuring robust governance and oversight of climate-related risks.

Identification of Climate-Related Risks and Opportunities

This year, the Company undertook a comprehensive process to identify climate-related physical and transition risks and opportunities relevant to its mobile internet, social network, publishing and advertising businesses. Supported by an external consultant, the methodology employed a multi-faceted approach:

- ⬤ Desktop Research
- – Internal Data Review: Analysed existing risk registers and assessed current climate mitigation initiatives.
- – External Benchmarking: Reviewed industry best practices, regulatory developments, and peer companies' disclosures to identify emerging trends and standards.

- ⬤ Business Unit Engagement
- – A self-assessment questionnaire was distributed to relevant business units to validate findings and gather additional insights on existing mitigation strategies.

This approach ensured a thorough evaluation of risks and opportunities, leveraging both internal expertise and external benchmarks to build a comprehensive understanding of climate-related impacts.

Description of Climate-Related Risks and Opportunities

Types of risks	Climate-related risks	Impacts on business model/ value chain	Our mitigation response
Climate-related physical risks			
Acute risk	Increased frequency of extreme weather events, such as: ● Flooding ● Typhoon / extreme wind ● Extreme heat / coldness	● Damage to buildings and infrastructure ● Disruptions to normal business operations ● Supply chain disruptions and delays ● Reduced workforce availability due to potential safety and health risks to employees in extreme weather events ● Increased insurance cost ● Increased energy cost	**Business Continuity and Disaster Recovery** ● Develop and implement comprehensive business continuity plans and IT disaster recovery plans, including system restoration drills, off-site backup storage, and redundant data centers across different geographic locations ● Regularly assess and maintain the structural integrity of data centers and set up backup power systems for critical operations **Employee Safety and Well-being** ● Adopt flexible working hours, remote working policies, and provide support for employees affected by extreme weather events ● Enhance safety training and emergency response planning guides **Supply Chain Resilience** ● Identify and diversify suppliers for critical materials, maintain strategic reserves, and develop contingency plans for alternative sourcing ● Energy Efficiency and Conservation, such as upgrade to energy-efficient equipment and lighting, conduct regular energy audits, and encourage energy-saving behaviors among employees **Risk Management and Insurance** ● Regularly assess and adjust insurance coverage based on changing climate risks and implement risk mitigation measures to reduce exposure and premiums
Chronic risk	● Rising mean temperature ● Rising sea level		
Climate-related transition risks			
Policy and legal risk	● Enhanced emissions reporting obligations	● Stricter disclosure requirements for climate-related information	● Establish robust ESG data collection and reporting processes
Market risk	● Increased demand for digital products and services due to changing consumer preferences influenced by climate change concerns	● Failure in transformation to digitalisation may result in lower profits	● Invest in digital content creation and distribution platforms ● Develop innovative digital ad formats and targeting capabilities ● Reskill workforce for digital content production and management ● Partner with technology providers to enhance digital offerings

Types of opportunities	Climate-related opportunities	Impacts on business model/ value chain	How we seize the opportunities
Markets	Access to new markets	● Increased revenues through higher adoption of digital publications, e-books, and online content ● Growth in digital advertising revenue as audiences shift to digital platforms	See note 1.
		● Increased demand for climate change-related content and information	● Develop a dedicated climate change content, which is vertical or channel ● Collaborate with climate experts and organisations to produce authoritative content ● Promote climate change content through social media and other digital channels
		● Increased adoption of remote work and virtual events due to climate change concerns	● Enhance features and capabilities for remote work and collaboration on social networking and mobile internet platforms

note 1. Same as the mitigation response for *"Increased demand for digital products and services due to changing consumer preferences influenced by climate change concerns"*.

Future Steps

As part of its ongoing commitment to managing climate-related risks and opportunities, we will initiate a climate-related scenario analysis to assess the potential impacts of these risks. The findings from this analysis will be disclosed upon completion and will further inform the Company's strategic planning and mitigation efforts.

Regulatory Compliance

The Group has established policies and accountability mechanisms to ensure compliance with environmental regulations. The management is committed to keeping abreast of the latest regulatory developments and providing training for relevant personnel as needed. During the reporting period, the Group was not aware of any non-compliance with laws and regulations having a significant impact on the Group related to air quality and GHG emissions, waste discharge into water bodies and land and generation of hazardous and non-hazardous wastes.

OPERATING
ETHICALLY

8 DECENT WORK AND ECONOMIC GROWTH

16 PEACE, JUSTICE AND STRONG INSTITUTIONS

To safeguard our business interests and uphold our reputation, we have consistently conducted our operations with unwavering ethical principles, fairness, and integrity, adhering to the highest standards of responsible conduct. This commitment actively avoids any actual and perceived conflicts of interest, emphasising zero tolerance for corruption and demonstrating unwavering respect for the rights of all individuals and organisations we engage with. Furthermore, our suppliers are expected to align themselves with our business values and ethical standards.

Business Ethics and Compliance

Rationale

The Group prioritises the highest standards of business integrity and compliance throughout our operations. We maintain a zero-tolerance approach to bribery, fraud and corruption, recognising that any unethical behaviour undermines the trust of our stakeholders and can harm our business prospects. Fostering a strong ethical corporate culture is essential for driving performance and building customer loyalty. Therefore, we are committed to the prevention, detection, deterrence, and investigation of all forms of misconduct.

Our Commitment

At the core of our businesses lies a steadfast commitment to business integrity. We have invested significant efforts in nurturing trust among our stakeholders, including customers, advisors, partners, suppliers, colleagues, regulators and other community members.

We acknowledge that fostering lasting trust requires the Group's commitment to legal compliance, transparent execution of our commitments and a strong dedication to moral righteousness. As a result, we have developed a resilient ethical culture throughout our operations, consistently adhering to the law and maintaining the highest standards of integrity without compromise.

The Board holds the ultimate responsibility and oversight for ensuring the Group's compliance with ethical standards. Directors and senior management of the Group are responsible for ensuring the effective implementation and the monitoring and investigation of any material fraudulent or bribery activities committed within the Group.

We have clearly defined our expectations and requirements through the relevant policies and guidelines we have established, as detailed in the table below.

Corporate Policy and Guideline	Expectations and Requirements	Applicable to
Code of Conduct	⦿ Promotes honest and moral conduct, including ethical handling of actual or apparent conflict of personal and professional interest in employees and other stakeholders.	All employees
Anti-Fraud and Anti-Bribery Policy	⦿ Prohibits improper payments, kickbacks and any form of bribery.	All employees
Policy on Appointment of Third-Party Representatives	⦿ Provides guidelines on the proper controls in engaging third-party representatives.	All employees
Supplier Code of Conduct	⦿ Provides guidelines to induce compliance to items in the Code and broader improvements of sustainability practices and performance.	All suppliers
Policy on Securities Dealing and Handling of Confidential and Price-sensitive Inside Information	⦿ Provides guidelines on handling of confidential information and price-sensitive inside information.	All employees
Competition Compliance Policy	⦿ Provides a framework to ensure the Group's operation compliance with the applicable legislation on a country-by-country basis. ⦿ Develop a consistent approach to ensure that, regardless of the location of our Company's operation, employees will continue to apply business practices attuned to our global reputation and standards.	All employees
Policy on Financial Management and Procedures	⦿ Outline basic financial management policies and procedures of the Group.	All employees

⚙ How We Work

Anti-corruption

Integrity and transparency are fundamental values of the Group, and we treat corruption with the utmost seriousness, viewing it as a significant violation of our *Code of Conduct*. Our Code clearly states our zero-tolerance stance toward corruption and graft. We are committed to supporting and guiding our employees in recognising and avoiding situations that could lead to or create the impression of corrupt practices and other forms of misconduct.

We have provision dealing with:

- Kickbacks
- Political and charity contributions
- Facilitation payment
- Gifts and hospitality
- Goods and services procurement

Our *Code of Conduct*, together with comprehensive induction training for new employees, highlights the critical importance of integrity and anti-corruption measures within our organisation. This training ensures that new hires understand our Group's commitment to cultivating a culture of transparency and ethical practices. All relevant staff members receive thorough briefings on key topics, including approvals, commercial considerations, procurement, and other essential elements of our ongoing anti-corruption initiatives. Furthermore, we conduct anti-corruption training sessions biannually for all employees, covering reporting procedures and encouraging them to use the designated mailbox or contact their department heads to report any concerns regarding bribery or corruption.

Our directors are responsible for overseeing the Group's anti-corruption policies and initiatives and remaining informed about current corporate issues, risks, and graft prevention strategies, including our whistle-blower programme, by regularly participating in relevant training and reviewing pertinent materials. Additionally, our general policy is to avoid donating to any political association or individual politician supporting any political cause.

In 2024, we did not receive any report or complaint on bribery, extortion, fraud or money laundering that has a material effect on our consolidated financials.

100%
of our directors and staff attended anti-corruption training

Whistle-blower programme

The Group is dedicated to upholding our *Code of Conduct*, which includes the establishment of a whistleblower mechanism. We actively encourage our employees and third parties, such as contractors and suppliers, to report any incidents of actual or suspected fraud, corruption or unethical behaviour through this designated channel. This mechanism also serves as a valuable tool for reporting issues such as discrimination, unfair dismissal, victimisation or unwarranted disciplinary actions, ensuring that all concerns are addressed promptly and appropriately.

We will carefully examine each allegation made, document, investigate and report all breaches to the Board. Substantiated conduct violations will result in disciplinary action, including the termination of employment.

We approach whistle-blower reports submitted through our mechanism with the utmost seriousness and conduct thorough investigations for each case. All information provided by a whistleblower is treated with strict confidentiality, except where disclosure is mandated by law. Retaliation against informants within the Group is explicitly prohibited, and we implement robust measures to protect whistleblowers from potential repercussions, including unfair dismissal, victimisation or unwarranted disciplinary actions.

The Group has established a set of internal escalation channels tailored to our operational needs. Suspected breaches are documented and reported to the Group Finance Department on a quarterly basis. Additionally, we have implemented a *Whistleblowing Policy* that provides guidance for reporting improprieties related to financial reporting, internal controls and other relevant matters.

Grievance management

We address and resolve grievances raised by both internal and external stakeholders in a transparent manner. This approach is a crucial component of our stakeholder engagement process, reflecting our commitment to acknowledging, valuing and acting on their concerns.

The Group is always willing to collaborate with our stakeholders to devise optimal solutions. All grievances will be thoroughly examined, and we maintain a strict policy against any form of retaliation toward complainants. Our *Employment Policy* clearly states that employees are free to express their concerns to management without facing any form of reprisal.

Since 2012, our Social Network and Publishing Groups have implemented a framework with escalation channels for investigating sexual harassment complaints in the workplace. Reporting hotlines and mailboxes have been set up and separated based on the complainant's gender, ensuring that individuals feel secure and comfortable when reporting incidents.

Cybersecurity and Customer Privacy

Rationale

In the era of digitalisation, the rise in cyber-attacks and data breaches has exposed individuals, businesses and organisations to significant risks. Cybersecurity has become a crucial concern when performing online transactions. As a technology and media company, protecting our operations, systems, networks and customer data from cyber threats is of the utmost importance to the Group. We have earned customer trust by delivering next-generation connectivity and ensuring the privacy protection of our customers.

We continuously evaluate and improve our data management practices while consistently striving to raise our cybersecurity standards to safeguard customer data. These proactive measures have effectively protected our IT system from malicious attacks or breaches, ensuring that our data is handled with a high level of caution and confidentiality.

Our Commitment

To ensure that all of our end users and networks comply with the required IT security and data security standards, we have outlined comprehensive sets of rules, policies and procedures in our *Information Security Policy*. The fundamental principles for information confidentiality, integrity and availability are also clearly defined and implemented throughout the Group.

The *Information Security Policy* is founded on these key principles:

- All parties seeking information access will be verified according to their integrity level, technical competence and need-to-know basis.

- Related employees are required to have a full understanding of the Group's information security policies and procedures and agree to perform their work duties accordingly.

- Business partners, suppliers, customers and associates of TOM Group must be made aware of their information security responsibilities with reference to specific contractual terms and phrase that define their relationship with the Group.

We have also formulated a *Policy on Personal Data Governance* to safeguard the personal data of employees and customers, in compliance with applicable data security laws.

The *Policy on Personal Data Governance* has outlined the follows:

- Personal Data should only be kept for as long as is necessary for the purposes for which it is being used. Guidelines around document retention periods should be issued by each BU to the relevant management and staff.

- Each BU is required to implement appropriate procedures to ensure that Personal Data is processed fairly and lawfully in accordance with the Data Privacy Principles and Applicable Data Protection Laws.

⚙ How We Work

TOM Group is committed to providing swift detection, response and recovery from IT security incidents. To enhance the resilience of our cybersecurity system, we have adopted a holistic approach that integrates people, technology and processes.

Recognising the inherent cyber risks associated with the technology and media industry, we strive to incorporate a culture of cybersecurity awareness and adherence in our employees' work processes. The Group consistently enhances our capability to protect ourselves while swiftly and effectively responding to any malicious manoeuvre targeting our networks and systems. Moreover, we have established risk-oriented plans to foster our cyber resilience, minimise disruptions and ensure the Group's business continuity and operations in case of cyber breaches and attacks.

The Group is dedicated to reinforcing our emergency readiness and maintaining ongoing alertness. Going forward, we will further enhance our cybersecurity measures by integrating people, technology and processes.

Policy and management

In case of a security breach, the Group is fully prepared with a well-defined standard operating procedure to swiftly address any security vulnerabilities, ensuring data control and protecting customer data privacy.

Our Group has also developed the following policies to operationalise our cybersecurity programme:

Cyber-security related policies	Expectations and requirements
Group Cyber Security Incident Reporting Policy	⦿ Provide guidelines for reporting and responding to cybersecurity incidents.
Code of Conduct	⦿ Lays down the guidelines for appropriate IT-related conduct and action at the Group and all its business entities.
Policy on Personal Data Governance	⦿ Provides guidelines on network and user management.
	⦿ Provides guidelines on personal data security, data audit and other personal data-related safety maintenance issues.
Information Security Policy	⦿ Describes policies on creation, communication, storage, transmission and destruction of information within the Group.

Risk assessment

New risks have arisen due to increasing dependence on information technologies and IT systems in business operations. As a result, performing cybersecurity risk assessments, which allow us to identify vulnerabilities in our IT systems and prioritise our information safety risks, becomes crucial.

We engage an external security consultant to perform an independent third-party assessment of the security of our IT systems and platforms at least once a year. Leveraging third-party cybersecurity frameworks, compliance or regulatory standards helps benchmark our security controls against established industry standards and best practices, thus allowing us to identify areas for potential system improvement. Furthermore, this exercise allows us to assess whether our risks have been properly monitored and managed.

As a crucial component of our cyber risk management process, the Group has established a standard procedure for immediate response to handle suspected or confirmed cyber incidents which offers clear guidelines for reporting, addressing, and reflecting on such incidents. Regular drills are carried out to maintain employee alertness by simulating various IT incidents. Our Publishing Group has conducted vulnerability analysis including simulated hacker attacks. It also completed customer service, employee information and ERP system restoration drills as part of the incident response plan. Additionally, our external cloud service provider has attained ISO/IEC 27017 and ISO/IEC 27018 accreditations for our information security management system. Our Mobile Internet Group's ERP system has also been audited by an external auditor during the year to verify its compliance and credibility.

Employee training

Maintaining a strong level of cybersecurity awareness among employees is crucial for protecting sensitive information and mitigating the risk of cyber-attacks, breaches, and data leakages. TOM Group has implemented a comprehensive cybersecurity training program that equips employees with the practical knowledge and skills necessary to defend against potential threats.

In the reporting year, TOM Group provided:

- Briefings on the operating procedures of the internal information security platform for every new employee.

- Orientation sessions by our Social Network Group to explain information security concepts and best practices.

- Digitalisation and cybersecurity online courses for employees in the Publishing Group.

Customer data privacy

The Group acknowledges the importance of responsible customer data management. As our customers have entrusted us with their personal information, the Group is obligated to strictly enforce its account authorisation management requirements to safeguard customer data obtained through our service interactions.

Our *Privacy Policy* illustrates the measures implemented to protect users' website browser security and the confidentiality of our customers' personal data. We handle all customer data collected through our online platforms and marketing initiatives in strict compliance with local regulatory obligations. Access to such information is restricted to authorised personnel only.

The Group regularly reviews and evaluates our data governance and privacy best practices. Our employees receive training and participate in workshops that equip them with practical skills in handling customer information responsibly and protecting data privacy. Our employees strictly adhere to our *Code of Conduct for Information Technology Usage*, which offers clear guidance on information protection, authorised usage, acceptable use, intellectual property rights, copyright, physical security, security of login information and consequences of violations.

Relevant policies to safeguard the personal information of our customers and employees have been formulated. Requirements and expectations of the Group regarding strong information and data security are outlined in the *Information Security Policy* and the *Policy on Personal Data Governance*.

During the reporting period, there had been no significant cases of non-compliance concerning the breach of customer privacy or loss of customer data.

Customer feedback management

At TOM Group, we highly value customer opinions as they enable us to enhance our operational procedures and improve the quality of our products and services. We have established dedicated strategies to manage customer feedback and implemented various initiatives to collect and analyse customer opinions, complaints, criticisms and suggestions.

To facilitate the collection of feedback and ensure prompt responses to customer issues, we have implemented an online service platform. This platform prioritises customer inquiries, with our Mobile Internet Group and Social Network Group committing to respond within 24 hours and deliver a detailed response within a week.

Our Mobile Internet Group conducts daily analysis and evaluation of customer complaints to improve the customer service experience. They consistently respond to commonly asked questions through their official account, ensuring that customers have access to the information they need. Similarly, our Social Network Group performs weekly assessment of customer satisfaction scores to ensure that customer needs are understood and addressed. A summary of reported complaints and relevant statistics, including investigation outcomes and actions taken, is regularly presented to its customer service supervisors for review and verification.

In addition to these initiatives, our Publishing Group has demonstrated its commitment to customer satisfaction by achieving a score of 4.3 out of 5 in customer service satisfaction surveys. This achievement reflects the effectiveness of the Group's customer service strategies and highlights the importance placed on meeting customer expectations.

No. of total products and service-related complaints received: 0
(2023:0)

No. of recall for safety & health reason: 0
(2023:0)

Intellectual Property Protection

◎ Rationale

Intellectual property plays a crucial role in promoting creativity and innovation. By protecting the intellectual efforts and ideas of our developers, we are able to drive our growth and contribute to broader economic, social, and cultural development. The Group is dedicated to protecting our key assets, including copyrights, patents, trademarks, and other various forms of intellectual property, which are fundamental to our success.

We uphold a strong commitment to respecting the intellectual property rights of third parties and strictly forbid the unauthorised utilisation of legally protected materials within our operations. These materials include software, data, text, graphics, images, sounds, animations, and movies.

🏆 Our Commitment

The Group's commitment to protecting intellectual property is demonstrated through our *Code of Conduct for Information Technology Usage*, which establishes guidelines for incorporating intellectual property rights and copyright regulations across the organisation.

Our *Policy on Securities Dealings and Handling of Confidential and Price-sensitive Inside Information* strictly prohibits employees from using or disclosing confidential information they have access to, unless it falls within their scope of job responsibilities or they have obtained appropriate prior approval or authorisation.

🧩 How We Work

To protect our intellectual property, the Group has registered trademarks and domain names in various jurisdictions. We are prepared to initiate legal proceedings if any infringement of our intellectual property is discovered. Our policy has also incorporated anti-copyright infringement terms, demanding mutual respect for our intellectual property rights as well as those of other parties.

Our Social Network Group has integrated an intellectual property clause into employee and supplier contracts. This clause safeguards the ownership of intellectual property created by employees during their employment and supplied by vendors throughout the contractual period.

Supply Chain Management

◎ Rationale

The Group is steadfast in its commitment to promoting responsible business practices and amplifying its influence across the entire value chain, from suppliers to business partners. Recognising that a sustainable supply chain can generate lasting value for both the Group and the communities where we operate, TOM Group has incorporated sustainability considerations into key elements of our supply chain and actively encourages our partners to embrace sustainability initiatives. For example, the Group encourages its business partners and suppliers to emulate the standards and practices outlined in the Group's *Environmental Policy*. Through close collaboration with our suppliers and business partners, we strive to promote sustainable business practices, support environmental conservation initiatives and deliver tangible social benefits to the regions we serve.

🏆 Our Commitment

Our *Supplier Code of Conduct* sets clear guidelines and expectations on human rights, employment practices, environmental impact, supplier diversity, conflicts of interest and other aspects of responsible business operation. These requirements apply equally to all our vendors and business partners. The Code has been developed by integrating concepts and policies from international charters and conventions, including the Universal Declaration of Human Rights ("UDHR") and the International Labour Organisation's ("ILO") Declaration on Fundamental Principles and Rights at Work, adopted in 1988.

Some key highlights in our *Supplier Code of Conduct* are as follows:

- Supplier shall comply with all local Personal Data Protection laws concerning data security and privacy, and shall protect and safeguard TOM Group's and its customers' confidential assets and information. Any transfer or sharing of data must be done in a manner that protects such information from inadvertent or unauthorised disclosure and any disclosure must be in compliance with local and international laws.

- Business partners and suppliers must respect intellectual property rights, including patents, trademarks, copyrights and process designs, and safeguard TOM Group's confidential and proprietary information.

We have also drawn useful inspiration and ideas from the following policies to support enforcement of supply chain sustainability in TOM Group:

- *Human Rights Policy* – we expect business partners and suppliers to embrace the principles of human rights protection.

- *Modern Slavery and Human Trafficking Statement* – we object to modern slavery and human trafficking and have actively prevented their occurrences in our business or supply chains.

- *Environmental Policy* – we have raised the awareness of suppliers and related stakeholders about environmental issues, eco-friendly practices and other environmental considerations.

Number of Suppliers by Geographical Region

- 15 — Hong Kong 3%
- 49 — Mainland China 9%
- 399 — Taiwan 74%
- 73 — Other Countries 14%

🧩 How We Work

Supplier screening and selection

We require our supply chain partners to align with the Group's business values and demonstrate a shared commitment to sustainability. This entails upholding high standards of ethical conduct, minimising environmental impacts and ensuring fair and equitable labour practices. Anti-fraud and anti-corruption clauses are included in our contracts to ensure potential suppliers and vendors are aware of the Group's expectations and requirements well in advance.

For instance, our Social Network and Publishing Groups mandate all new suppliers to complete a self-assessment questionnaire. This questionnaire assesses their sustainability practices across various criteria, including:

- Anti-discrimination measures;
- Remuneration packages;
- Prohibition of child labour;
- Workplace safety; and
- Environmental performance.

New suppliers must comply with environmental regulations and labour standards to establish business partnerships with the Group. For example, our Social Network and Publishing Groups require suppliers to perform self-audits and confirm their compliance with the criteria outlined in the *Supplier Code of Conduct.* Supplier contracts will only be renewed once the Group is assured that vendors have met their compliance obligations.

We have established a hierarchy of authorities internally for procurement decisions, which undergo a series of vetting procedures before reaching the appropriate level of authority for final approval. This regime has been implemented across all the Group's business units.
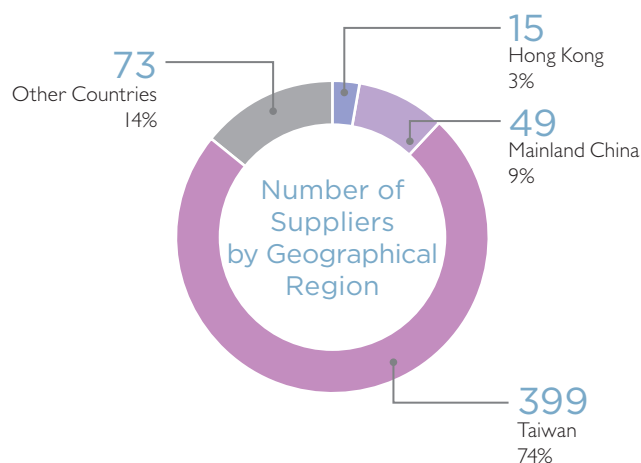
Supplier performance evaluation

Regular evaluations of supplier performance are essential to ensure the long-term sustainability of our supply chain. Through the period of evaluation, the Group actively monitors and tracks the progress of our suppliers and contractors, evaluating their sustainability efforts and determining the ongoing viability of our partnerships. The supplier evaluation system is crucial in ensuring accountability by:

- Verifying contract compliance;
- Mitigating operational risks;
- Reducing costs; and
- Promoting continuous improvement in sustainability practices.

Regulatory Compliance

The Group has placed high importance on relevant regulatory compliance concerning health and safety, advertising, labelling and privacy matters relating to products and services and methods of redress. The Group is not aware of any incidents of material non-compliance with laws and regulations concerning health and safety, advertising, labelling and privacy matters relating to products and services and methods of redress, that have a significant impact on the Group during the reporting period.

Rationale

TOM Group is committed to making a positive impact on society, fostering collective advancement, and nurturing harmonious relationships with the community. Our engagement in social responsibility initiatives not only enhances our brand reputation but also strengthens our connections with potential clients across various stakeholder groups.

The Group is dedicated to addressing some of the most pressing social and environmental challenges facing the world today. We actively leverage our products, services, technology, talent and network to create significant societal impact and foster positive change.

Our Commitment

TOM Group is dedicated to engaging in programmes that promote positive community development while reflecting our values and sustainable objectives for various communities' diverse cultures and specific social needs.

In line with our *Corporate Communications Policy*, we actively support initiatives that enhance environmental well-being, education, public health and community services.

How We Work

Environmental Protection

In July 2024, our Publishing Group, in collaboration with various organisations, hosted the "2024 Taiwan Renewable Procurement Summit". This event brought together policymakers, international energy experts, and corporate leaders to explore the latest trends and opportunities in green power trading. The summit focused on the development of renewable energy and examined the current state of renewable energy across Asia, offering valuable perspectives for Taiwanese businesses on how to effectively navigate the evolving landscape of sustainable energy.

During the year, our Mobile Internet Group was honoured with the "2024 ESG Exemplary Enterprise Award" at the 2024 International Green Zero-Carbon Festival held in Beijing. This prestigious festival serves as a key event for carbon neutrality and ESG initiatives. Our Mobile Internet Group's exceptional achievements in its field earned the Group this distinguished recognition, highlighting our commitment to promoting sustainability within the industry.

Our corporate office also organised a fundraising initiative to support the Green Low Carbon Day, hosted by The Community Chest in June 2024. This effort aimed to raise funds for green related projects and encourage participants to adopt a low-carbon lifestyle. Moreover, our corporate office encourages all its employees to participate in the World Wildlife Fund Event - Earth Hour 2024 - to show our commitment to addressing the climate crisis and preserving biodiversity on earth by switching off non-essential lights for one hour. Through our involvement, we showcased our commitment to sustainability and community engagement, fostering a shared responsibility for a greener future.

Donation of advertising space

Our Publishing Group is actively engaged in community service by donating advertising space to foundations and charitable organisations. Throughout the year, it has generously donated 11 advertising spaces to various organisations, including the Children Are Us Foundation, the World Peace Association, the World Vision Taiwan, the Formosa Cancer Foundation, the Pearl S. Buck Foundation and the Eden Social Welfare Foundation. This collaboration aims to raise awareness and foster public support and care for underprivileged communities. By providing these advertising spaces, we not only support the missions of these foundations but also contribute to the development of a more inclusive and supportive society.

Promoting healthy reading habits

Since 2005, the Group has been dedicated to promoting healthy reading habits among individuals from diverse social backgrounds. In August 2024, we collaborated with the Child Helper Development Center Association for the "Love to Read · Love Environment" event. As part of this initiative, the Group generously donated a collection of children's books and organised a story-sharing programme along with a craft workshop using recycled materials. These efforts not only aimed to nurture a love of reading among children but also to instill a strong sense of environmental stewardship, demonstrating our ongoing commitment to caring for both the community and the planet.

Community engagement

Our Publishing Group supports World Reading Day by hosting the annual "Read for Love" charity event every April. This initiative has invited celebrities, public figures and corporate representatives. Participants select a children's storybook or picture book to read online to children to promote family interactions and nurture good reading habits in young children.

To support disadvantaged groups in the community, our corporate office has encouraged its employees to participate in "Skip Lunch Day" and "Dress Casual Day" organised by The Community Chest to help and bring hope to disadvantage groups in the community. Moreover, our corporate office also participated in the blood donation event, which aimed to help provide blood to local hospitals and healthcare facilities, reflecting our commitment to community support and social responsibility.

About this Report

Reporting Period

As a purpose-driven organisation, TOM Group is issuing its fourth standalone Sustainability Report in the Group's sustainability disclosure journey, in which the Group is continuously looking to enhance reporting approaches as well as address the sustainability concerns of its stakeholders. This report covers the year from 1 January 2024 to 31 December 2024, unless otherwise specified.

Reporting Boundary

The information disclosed in the Sustainability Report covers our core and material operations in our Mobile Internet, Social Network, Publishing and Advertising Groups. These operations of ours span the cities of Hong Kong, Beijing and Taiwan in the Greater China region. Due to business arrangements, our scope of reporting will not cover business units and their business activities that the Group has no direct management control over.

Reporting Framework

This Report is prepared in accordance with the mandatory disclosure requirements and the "comply or explain" provision of the ESG Reporting Code ("ESG Code") contained in Appendix C2 to The Rules Governing the Listing of Securities on The Stock Exchange of Hong Kong Limited. The ESG Code Content Index, which is printed on page 45-48, contains information about the extent to which the Group has applied the code with cross-references to the relevant sections in this report.

This report should be read in conjunction with the Group's 2024 Annual Report, which offers a detailed overview of its financial performance and corporate governance in the past fiscal year, combined with the key policies published on the Group's official website.

Reporting Principles

The Group has applied the following reporting principles of the ESG Code in preparing this Sustainability Report:

- **Materiality** – the Group focuses on matters that impact business growth and are of importance to our stakeholders. For more information, please refer to section of Materiality assessment.
- **Quantitative** – information of the standards, methodologies, assumptions and/or calculation references and source of key conversion factors used on the key performance indicators ("KPIs") stated, wherever appropriate.
- **Balance** – this report discloses information in an objective manner, aiming to provide stakeholders with an unbiased picture of the Group's overall sustainability performance.
- **Consistency** – consistent methodologies are adopted when calculating the quantitative KPIs unless otherwise specified. Reasons would be provided for any restating of information published in the report.

Language

In case of discrepancy between the Chinese and English versions of the Sustainability Report, the English version shall prevail.

Definitions

Unless otherwise specified, capitalised terms used in this Sustainability Report shall have the same meanings as those defined in the Group's 2024 Annual Report.

Feedback

The Group welcomes feedback on this Sustainability Report, its approach to sustainability and performance. Please share your views at ir@tomgroup.com.

Key Performance Data[4]

Environmental Data

Environmental Indicators	2024	2023	% Difference
GHG Emissions (tonnes CO_2e)[5]	4,432.8	4,765.8	-7%
Scope 1[6]	19.4	15.7	24%
Scope 2[7]	4,263.3	4,652.2	-8%
Scope 3[8]	150.1	97.9	53%
Carbon Intensity (tonnes CO_2e/employee)	4.0	4.0	0%
Energy Consumption[9] (GJ)	30,653.8	33,046.5	-7%
Direct Energy Consumption	254.5	206.8	23%
Indirect Energy Consumption	30,399.3	32,839.7	-7%
Energy Intensity (GJ/employee)	27.6	27.8	-1%
Paper Consumption (tonnes)	5,003.8	5,425.0	-8%
Office paper	11.8	13.0	-9%
Paper for Publishing Business	4,992.0	5,412.0	-8%
Water Consumption (m^3)[10]	10,572.4	23,646.2	-55%
Water Intensity (m^3/employee)	9.5	19.9	-52%
Packaging Material (tonnes)	2.8	3.1	-8%
Plastic packaging	2.8	3.1	-8%
Air Emissions (kg)[11]			
NOx	24.6	12.7	95%
Particulate Matters	2.3	1.1	98%
SOx	0.11	0.09	23%

[4] The scope of environmental and social performance excludes business units in which the Group has no management control over in the reporting period.

[5] Calculated with reference to "Guidelines to Account for and Report on Greenhouse Gas Emissions and Removals for Buildings (Commercial, Residential or Institutional Purposes) in Hong Kong" issued by the Environmental Protection Department ("EPD") and the Electrical and Mechanical Services Department ("EMSD") of the HKSAR Government.

[6] Include diesel and petrol consumption by corporate fleet, and the increase in scope 1 emissions between 2023 and 2024 was mainly attributed to the increased use of vehicles from our Publishing operations.

[7] Emissions associated with electricity purchased are calculated based on the latest available emissions factors provided by the power companies.

[8] Include GHG emissions related to business air travel and the increase in scope 3 emissions between 2023 and 2024 was mainly attributed to the increased number of business travel from our Publishing operations.

[9] The factors for converting the base units of different fuel types to gigajoule ("GJ") are based on guidelines issued by HKEX.

[10] The decrease in water consumption between 2023 and 2024 was mainly attributed to our Publishing operations relocated to an office building that has been certified with the Ecology, Energy Saving, Waste Reduction and Health ("EEWH") Gold certificate, which promotes water conservation initiatives within the facility.

[11] The emission factors are based on guidelines issued by HKEX.

Social Data

Workplace Indicators	2024	2023
Employment		
Number of employees	1,111	1,190
By employment category		
Full-time	1,077	1,152
Part-time / Contract	34	38
Full-time employees by gender, age group and region		
By gender		
Male	311	331
Female	766	821
By age group		
Below 30	178	214
30-49	675	735
50 and above	224	203
By region		
Hong Kong	46	46
Mainland China	39	54
Taiwan	970	1,030
Other Countries	22	22
Full-time employee turnover rate (%)[12]		
Total	26%	22%
By gender		
Male	25%	25%
Female	26%	21%
By age group		
Below 30	49%	46%
30-49	25%	20%
50 and above	9%	7%

[12] Employee turnover rate = number of turnover in the category/ total workforce of the category at the end of the reporting period x 100%.

Workplace Indicators	2024	2023
Employment		
Full-time employee turnover rate (%)[12]		
By region		
Hong Kong	4%	15%
Mainland China	38%	67%
Taiwan	26%	21%
Other Countries	9%	0%
Training and Development		
Average hours of training per employee[13]	6.09	8.59
By gender		
Male	5.23	6.75
Female	6.45	9.34
By employee category		
Manager grade or above	4.67	7.95
General staff	6.19	8.64
Percentage (%) of employees who received training[14]		
By gender		
Male	100%	100%
Female	100%	100%
By employee category		
Manager grade or above	100%	100%
General staff	100%	100%
Occupational Health and Safety		
Number of reportable injuries	16	8
Number of lost days due to work injuries	129	17

[12] Employee turnover rate = number of turnover in the category/ total workforce of the category at the end of the reporting period x 100%.

[13] Permanent full-time staff. Average training hours = total hours of training received by employees / total workforce at the end of the reporting period.

[14] Permanent full-time staff including terminated employees who left the Group during the reporting period. Percentage of employees who received training = number of employees trained /total workforce at the end of the reporting period x 100%. The percentage of employees trained may exceed 100%.

Mandatory Disclosure Requirements		Page	Remarks
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.	04-08	-
Reporting Principles — Materiality	(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.	13, 41	-
Reporting Principles — 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).	41	-
Reporting Principles — 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.	41	-
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.	41	-

Subject Areas, Aspects, General Disclosures and KPIs		Page	Remarks
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.	24-29	◉ Biodiversity Policy ◉ Code of Conduct ◉ Environmental Policy ◉ Sustainability Policy ◉ Supplier Code of Conduct
KPI A1.1	The types of emissions and respective emissions data.	42	-
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).	27, 42	-
KPI A1.3	Total hazardous waste produced (in tonnes) and, where appropriate, intensity (e.g., per unit of production volume, per facility).	-	The Group does not generate any hazardous waste in its operations.

KPI A1.4	Total non-hazardous waste produced (in tonnes) and, where appropriate, intensity (e.g., per unit of production volume, per facility).	-	General non-hazardous office waste generated is disposed of through waste separation and recycling facilities provided by the property management companies of the office buildings in which our business units are located.
KPI A1.5	Description of emission target(s) set and steps taken to achieve them.	25	-
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.	25	-
Aspect A2: Use of Resources			
General Disclosure	Policies on the efficient use of resources, including energy, water and other raw materials.	24-29	◉ Biodiversity Policy ◉ Code of Conduct ◉ Environmental Policy ◉ Sustainability Policy ◉ Supplier Code of Conduct
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).	27, 42	-
KPI A2.2	Water consumption in total and intensity (e.g. per unit of production volume, per facility).	42	-
KPI A2.3	Description of energy use efficiency target(s) set and steps taken to achieve them.	25	-
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.	-	While water use is not considered material for the Group, the Group does not encounter any issues in sourcing water.
KPI A2.5	Total packaging material used for finished products (in tonnes) and, if applicable, with reference to per unit produced.	42	-
Aspect A3: The Environment and Natural Resources			
General Disclosure	Policies on minimising the issuer's significant impact on the environment and natural resources.	24-29	◉ Biodiversity Policy ◉ Environmental Policy ◉ Sustainability Policy ◉ Supplier Code of Conduct
KPI A3.1	Description of the significant impacts of activities on the environment and natural resources and the action taken to manage them.	24-29	-
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.	28-29	◉ Biodiversity Policy ◉ Environmental Policy ◉ Sustainability Policy
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.	28-29	

B. Social

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.	15-16 21-23	● Code of Conduct ● Employment Policy
KPI B1.1	Total workforce by gender, employment type, age group and geographical region.	16, 43	-
KPI B1.2	Employee turnover rate by gender, age group and geographical region.	43-44	-

Aspect B2: Health and Safety

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.	17-18	● Health and Safety Policy
KPI B2.1	Number and rate of work-related fatalities occurred in each of the past three years including the reporting year.	17	-
KPI B2.2	Lost days due to work injury.	17, 44	-
KPI B2.3	Description of occupational health and safety measures adopted, how they are implemented and monitored.	17-18	-

Aspect B3: Development and Training

General Disclosure	Policies on improving employees' knowledge and skills for discharging duties at work. Description of training activities.	19-20	-
KPI B3.1	The percentage of employees trained by gender and employee category.	44	-
KPI B3.2	The average training hours completed per employee by gender and employee category.	44	-

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 relating to preventing child and forced labour.	15, 23	● Human Rights Policy ● Modern Slavery and Human Trafficking Statement ● Supplier Code of Conduct
KPI B4.1	Description of measures to review employment practices to avoid child and forced labour.	-	
KPI B4.2	Description of steps taken to eliminate such practices when discovered.	-	

Aspect B5: Supply Chain Management

General Disclosure	Policies on managing environmental and social risks of the supply chain.	36-37	● Human Rights Policy ● Modern Slavery and Human Trafficking Statement ● Supplier Code of Conduct

KPI B5.1	Number of suppliers by geographical region.	37	-
KPI B5.2	Description of practices relating to engaging suppliers, number of suppliers where the practices are being implemented, how they are implemented and monitored.	36-37	◉ Policy on Appointment of Third Party Representatives
KPI B5.3	Description of practices used to identify environmental and social risks along the supply chain, and how they are implemented and monitored.	36-37	-
KPI B5.4	Description of practices used to promote environmentally preferable products and services when selecting suppliers, and how they are implemented and monitored.	25, 27-28	-

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.	30-36	◉ Code of Conduct ◉ Group Cyber Security Policy ◉ Policy on Personal Data Governance
KPI B6.1	Percentage of total products sold or shipped subject to recalls for safety and health reasons.	35	-
KPI B6.2	Number of products and service-related complaints received and how they are dealt with.	35	-
KPI B6.3	Description of practices relating to observing and protecting intellectual property rights.	36	-
KPI B6.4	Description of quality assurance process and recall procedures.	30-35	-
KPI B6.5	Description of consumer data protection and privacy policies, how they are implemented and monitored.	30-35	◉ Information Security Policy ◉ Policy on Personal Data Governance

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 laundering.	30-33	◉ Code of Conduct ◉ Anti-Fraud and Anti-Bribery Policy ◉ Policy on Appointment of Third Party Representatives
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.	32	-
KPI B7.2	Description of preventive measures and whistleblowing procedures, how they are implemented and monitored.	32-33	◉ Whistleblowing Policy
KPI B7.3	Description of anti-corruption training provided to directors and staff.	32	-

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.	38-40	◉ Corporate Communications Policy
KPI B8.1	Focus areas of contribution (e.g. education, environmental concerns, labour needs, health, culture, sport).	38-40	-
KPI B8.2	Resources contributed (e.g. money or time) to the focus area.	38-40	-

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