# SHUN HO HOLDINGS LIMITED (Stock Code: 253)

ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT For the Year Ended 31 December 2024

## INTRODUCTION, ENVIRONMENTAL, SOCIAL AND GOVERNANCE POLICIES

Shun Ho Holdings Limited (the "Company", together with its subsidiaries the "Group") believes sustainability is a crucial element to achieve continuing success and has therefore embedded this key concept into its business strategy. In order to pursue a successful and sustainable business model, the Group is committed to promoting the sustainable culture in aspects of environment and society among all its employees and stakeholders. This culture enables the Group to develop appropriate environmental, social and governance ("ESG") policies and procedures in its daily operations and governance perspectives, to monitor and evaluate the progress of the ESG efforts, while reporting its performances to investors and key stakeholders.

## ABOUT THE ESG REPORT

This Environmental, Social and Governance report (the "ESG Report") summarises the ESG initiatives, plans and performances of the Group and presents its commitment to sustainable development.

### SCOPE OF REPORTING

The Group owns seven hotels in Hong Kong, which were built for hotel investments and operations purpose, including (1) Best Western Plus Hotel Kowloon, (2) Best Western Plus Hotel Hong Kong, (3) Best Western Hotel Causeway Bay, (4) Ramada Hong Kong Harbour View, (5) Ramada Hong Kong Grand, (6) Grand Bay View Hotel, and (7) Ramada Hong Kong Grand View (collectively, the "Hotels"). The Group also owns two hotels that are not located in Hong Kong, which are Magnificent International Hotel, Shanghai (located in Shanghai, the PRC) and Royal Scot Hotel (located in London, UK). Under the principle of Materiality, this ESG Report covers the environmental and social performance of our major operations in Hong Kong, including the seven Hotels and the headquarter office of the Group.

## **REPORTING FRAMEWORK**

This is the ninth ESG Report of the Group, highlighting its ESG performance and compliance with the Environmental, Social and Governance Reporting Guide (the "ESG Reporting Guide") set out in Appendix C2 of the Rules (the "Listing Rules") governing the Listing of Securities on The Stock Exchange of Hong Kong Limited (the "SEHK"), under the "Comply or Explain" provision.

#### **REPORTING PERIOD**

This ESG Report covers the Group's overall ESG performance of the Hotels and the headquarter of the Group in Hong Kong for the year ended 31 December 2024 ("2024" or the "Reporting Period"), unless otherwise stated.

## **REPORTING PRINCIPLES**

The Group places a great emphasis on materiality, quantitative, balance, and consistency during the preparation for the ESG Report, and the Group has applied these reporting principles as follows:

**Materiality:** Stakeholder engagement and materiality assessment are conducted by the Group to identify material issues in a regular manner, thereby identifying and placing more focus on the material issues that are of concern for the ESG Report. For further information, please refer to the sections headed "Stakeholder Engagement" and "Materiality Assessment".

**Quantitative:** This ESG Report is prepared in compliance with the ESG Reporting Guide and relevant key performance indicators ("KPIs"), which are disclosed in a quantitative manner. The KPIs are supplemented by explanatory notes to establish benchmarks, and calculation standards, methodologies or assumptions are explained where appropriate.

**Balance:** The ESG performance of the Group is disclosed with transparency and data are presented in an unbiased manner to prevent this ESG Report from misleading readers.

**Consistency:** This ESG Report remains consistent with the report published in previous year in terms of reporting framework and data analysis approach. Explanations will be provided when there are changes with the scope of data disclosure and calculation methodologies.

## ESG GOVERNANCE

The Group has established an ESG working Committee (the "ESG Committee"), consisting of management staff from relevant departments to assist in data collection and compilation of the ESG Report. The ESG Committee regularly reports to the board of Directors (the "Board"), assists in evaluating, identifying and managing ESG-related risks of the Group, and reflects whether its internal control system is appropriate and effective. The committee members review the ESG performance of the Group, including environmental, labour practices and other ESG aspects.

The Board is fully responsible for the Group's ESG strategies and reporting, as well as the oversight and management of the Group's ESG-related issues. The Board periodically discusses and reviews the Group's ESG risks and opportunities, performance, goals and targets with the support of the ESG Committee, aiming to better manage the Group's ESG performance, related issues and potential risks. Moreover, the Board is responsible for guaranteeing the effective ESG risk management and internal control mechanism, and fostering the exchange of best practices with other comparable companies. In 2024, the Group confirmed that it has established proper and effective management policies and internal control systems for ESG issues.

In addition, to demonstrate the Group's commitment to sustainable development, a series of environmental targets have been developed with the consideration of the Group's hotel business along with the implementation of ESG-related policies and guidelines.

# STAKEHOLDER ENGAGEMENT

In order to identify the material ESG issues pertinent to the Group, key stakeholders including the Board, senior management, and employees have been engaged in periodical sessions. These engagements thereby fostering the optimal growth of the business and enhancing preparedness for forthcoming challenges. The table below summarises the category, expectation and concerns on sustainable development, and the preferred communication channels of stakeholders:

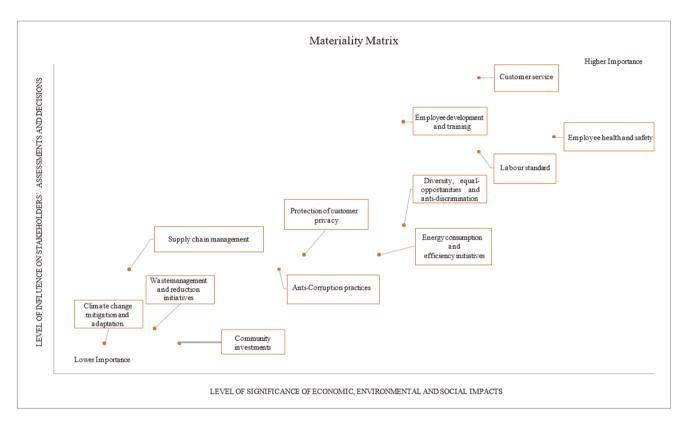
Stakeholders	Expectations and concerns for the Group's sustainable development	Communication channels
The Board and senior management	<ul> <li>Compliance with laws and regulations</li> <li>Anti-corruption</li> <li>Talent retention</li> <li>Corporate sustainability</li> </ul>	<ul><li>Training and seminars</li><li>Regular meetings</li><li>Industrial seminars</li></ul>
Employees	<ul> <li>Employee health and safety</li> <li>Employee development and training</li> <li>Equal opportunities</li> <li>Protection of employees' rights and interests</li> <li>Compliant operation</li> <li>Working environment</li> </ul>	<ul> <li>On-job training</li> <li>Mentoring by direct supervisor</li> <li>Regular team sharing</li> <li>Employee notice boards</li> <li>Performance reviews</li> <li>Employee handbook</li> </ul>

The Group values the diverse opinions from all categories of stakeholders with different perspectives. Therefore, it is dedicated to collaborating with its stakeholders to further improve its ESG performance and keep on creating long-term value for the wider community.

## MATERIALITY ASSESSMENT

The management and employees who have great influences on the operations of the Group have participated in preparing the ESG Report and aided in the review of the Group's operation, the identification of key ESG issues, and the evaluation of the importance of these issues to its businesses and stakeholders. With reference to the identified material ESG issues, a questionnaire was designed to collect feedback from the internal stakeholders of the Group.

The following materiality matrix summarises the Group's material ESG issues as set out in the ESG Report:



# **CONTACT US**

The Group values and hence welcomes stakeholders to provide opinions and suggestions. You can provide valuable advice in respect of the ESG Report or the Group's performances in sustainable development by the following means:

Address: 3rd Floor, Shun Ho Tower, 24–30 Ice House Street, Central, Hong Kong Email: is-enquiries@vistra.com

## **OUR ENVIRONMENT**

The Group strives to protect the environment through implementing a series of control activities and monitoring measures in its business activities and workplace. In addition, the Group is committed to creating a green environment by introducing environmentally-friendly business practices, enhancing employees' awareness of environmental protection through education, as well as complying with the relevant environmental laws and regulations.

The Group has set targets for the environmental aspect to manage the Group's material topics and its performance in an organised manner. The Group will keep monitoring the progress of environmental targets set and review them annually.

The following table summarises the Group's sustainability targets and actions:

Yea	arly Environmental Targets	Actions		
<ul> <li>Emissions:</li> <li><b>1.</b> GHG Emissions <ul> <li>Taking 2024 as the baseline year, the Group aims to maintain its GHG emissions intensity in 2025, within the same reporting scope.</li> </ul> </li> </ul>		To achieve this target, the Group offers employees with training materials in relation to environmental protection from time to time, thereby enhancing their awareness and competency in low-carbon practices.		
Wa	ste Management:			
<ul> <li>Non-hazardous waste         Taking 2024 as the baseline year, the Group aims to maintain its non-hazardous waste intensity in 2025, within the same reporting scope.     </li> </ul>		To achieve this target, the Group participated in waste reduction activities, including the "Mid- Autumn Festival Mooncake Box Collection Program" and the "Lunar New Year Red Packet Reuse and Recycle Program" organised by Greeners Action, to enhance employees' awareness in waste reduction and waste recycling.		

Use 3.	of Resources: Energy Management Taking 2024 as the baseline year, the Group aims to maintain its total energy consumption intensity in 2025, within the same reporting scope.	To achieve this target, the Group took part in energy-saving activities, including the "No Air Con Night" programme organised by Green Sense, to encourage employees to save energy.
Use 4.	of Resources: Water Management Taking 2024 as the baseline year, the Group aims to maintain its total water consumption intensity in 2025, within the same reporting scope.	To achieve this target, the Group implements a various water-saving initiatives, including placing water conservation signs in washrooms of the Hotels and headquarter office to remind customers and employees to save water.

## A1. Emissions

In order to minimise and mitigate the environmental impacts produced by the Group's operations, the Group has adopted and implemented relevant environmental policies. In 2024, the Group complied with the relevant laws and regulations in Hong Kong relating to air and greenhouse gas ("GHG") emissions, discharges into water and land, and generation of hazardous and non-hazardous waste that have a significant impact on the Group. The relevant laws and regulations include, but not limited to:

- Air Pollution Control Ordinance (Chapter 311 of the Laws of Hong Kong);
- Waste Disposal Ordinance (Chapter 354 of the Laws of Hong Kong);
- Water Pollution Control Ordinance (Chapter 358 of the Laws of Hong Kong); and
- Noise Control Ordinance (Chapter 400 of the Laws of Hong Kong).

## Air Emissions

The major air emissions produced by the Group are Nitrogen Oxides (" $NO_x$ "), Sulphur Oxides (" $SO_x$ ") and Particulate Matter ("PM"), which were generated from the towngas and gasoline used in the Hotels and vehicles used by employees for travelling.

Types of air	T 1	Emission amount	
emissions	Unit	2024	2023
NO <sub>x</sub>	kg	79.83	67.54
SO <sub>x</sub>	kg	0.73	0.59
PM	kg	1.47	1.10

Summary of air emissions performance:

# GHG Emissions

Due to the business nature of the Group, the direct GHG emissions (Scope 1) primarily come from the fuel used by vehicles owned by the Group and the towngas used in towngas consuming devices in the Hotels. The use of purchased electricity and towngas was the main contributor of the energy indirect GHG emissions (Scope 2). Other indirect GHG emissions (Scope 3) includes both upstream and downstream emissions, such as methane gas generation at landfill due to general waste of disposal, and GHG emissions due to electricity used for processing fresh water and sewage by the government.

To reduce GHG emissions, the Group has actively implemented electricity conservation and energy-saving measures, as well as other initiatives, including:

- Turn off air-conditioners in idle guest waiting areas and staff restrooms;
- Enhance the awareness of employees in turning off the lightings in work areas during their lunch breaks;
- Deliver various energy-saving guidelines to staff (Including turning off computers, lights and other office equipment after work and during the holiday, as well as closing windows when the air conditioning is in use);
- Centralise the orders for office supplies from various departments to reduce delivery distance, thus reducing indirect emissions from transportation; and
- Adopt measures for environmental protection, energy conservation, and water-saving actively.

More measures are described in the sections headed "Energy Consumption" and "Water Consumption" in aspect A2. With the implementation and promotion of the above GHG emissions controlling measures, employees are more aware of reducing unnecessary consumption of resources and hence lowering GHG emissions.

The total GHG emission intensity of the Group decreased by around 10.53% from approximately 0.019 tCO2e/room night in 2023 to approximately 0.017 tCO2e/room night in 2024. This is due to higher energy efficiency of air-conditioners under routine maintenance, reduced towngas usage for water heating per room night in response to warmer climate conditions, and a decline in general waste disposal at landfills during the year under review.

Summary of GHG emissions performance:

In Restan	Unit	GHG emissions	
Indicator		<b>2024</b> <sup>1</sup>	2023
Direct GHG emissions (Scope 1) - Towngas consumption - Gasoline used in company vehicles	tCO <sub>2</sub> e	874.18	757.81
Energy indirect GHG emissions (Scope 2) – Purchased electricity and towngas	tCO <sub>2</sub> e	11,406.85	10,536.96
Other indirect GHG emissions (Scope 3) - Electricity use for fresh water and sewage processing by government departments, and paper disposal at landfills	tCO <sub>2</sub> e	1,914.84	2,083.89
Total GHG emissions	tCO <sub>2</sub> e	14,195.88	13,378.66
Intensity <sup>2</sup>	tCO <sub>2</sub> e/ room night	0.017	0.019

Notes:

- GHG emission data are presented in terms of carbon dioxide equivalent and are based on, but not limited to, "The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standards" issued by the World Bank Institute and the World Business Council for Sustainable Development, "How to prepare an ESG Report – Appendix 2: Reporting Guidance on Environmental KPIs" issued by SEHK, the "Global Warming Potential Values" from the IPCC Fifth Assessment Report, (AR5), the latest "Environmental, Social and Governance Report" published by The Hong Kong and China Gas Company Limited, the latest "Sustainability Report" published by the CLP Power Hong Kong Limited, the latest "Sustainability Report" published by HK Electric Investments and HK Electric Investments Limited, the latest "Annual Report" published by Water Supplies Department and the latest "Sustainability Report" published by Drainage Services Department; and
- 2. In 2024, the total number of room nights was 854,711 (2023: 719,752). This figure is also used for calculating other applicable intensity data.

## Waste Management

## Hazardous Waste Handling Method

In 2024, the Group did not generate any hazardous wastes. However, the Group has established guidelines for governing the management and disposal of hazardous wastes. In case of any unusual generation of hazardous waste, the Group must engage a qualified and professional chemical waste collector for the waste handling, in order to adhere to the relevant environmental laws and regulations.

## Non-hazardous Waste Handling Method

The Group's general waste intensity was 0.001 tonnes/room night in 2024 and 0.002 tonnes/room night in 2023. Non-hazardous waste from the Group's operation includes packaging materials of hotel guest supplies, paper for office use, and kitchen waste from restaurants of the Hotels. The Group has put all its efforts to reduce adverse environmental impacts. During the Reporting Period, the Group adopted the use of biodegradable materials for packaging hotel guest supplies, reducing the disposal of single-use plastic packaging materials to landfills.

Indicator	Unit	2024	2023
General waste	tonnes	1,113.51	1,246.35
Intensity	tonnes/ room night	0.001	0.002

Additionally, the Group strives to reduce the consumption of paper and the disposal of paper waste. Paper-saving initiatives, including the promotion of using recycled paper for printing, the advocation of establishing environmental-friendly habits of photocopying, the classification of waste paper collected for effective recycling, among employees have been implemented continuously. In 2024, the Group consumed a total of approximately 16.54 tonnes of paper with an intensity of approximately 0.028 tonnes per employee for daily operations of office and Hotels.

Indicator	Unit	2024	2023
Paper waste	tonnes	16.54	18.14
Intensity <sup>1</sup>	tonnes/ employee	0.028	0.032

Note:

1. In 2024, the total number of employees was 595 (2023: 562). This figure is also used for calculating other applicable intensity data.

## Recycling Our Waste

The Group is committed to recycling as much non-hazardous waste generated as possible, reducing the amount of waste disposed of to landfills and producing fewer indirect GHG emissions. The Group has coordinated with professional recycling companies for the collection of plastic bottles, ensuring that a maximum number of recyclable bottles are diverted from direct disposal in landfills, thereby minimising the environmental impact associated with plastic bottle disposal.

Due to the business nature of the Group, its operation has no significant impacts on the environment. The Group will still continuously monitor and evaluate the possibility and severity of any environmental risks, with corresponding risk mitigation plans formulated. The Group is committed to the adoption of minimal and efficient consumption of natural resources, while reducing the amount of waste generated.

## Discharges into Water

The amount of the Group's water consumption is assumed to be the same as the wastewater discharge volume since the wastewater from all the Hotels is discharged into the municipal sewage pipeline network for processing. The data of wastewater discharge volume can be found in the section headed "Water Consumption" in aspect A2. The Group is committed to adopting cleaning products which are environmental-friendly so as to minimise the risk of water pollution due to its operation.

#### A2. Use of Resources

The Group has always placed great emphasis on saving energy and natural resources. During the operation, there is a frequent consumption of electricity and water, and hence the Group has set up relevant policies and procedures in managing the efficient use of resources, with reference to the objective of achieving higher energy efficiency and reducing the unnecessary use of resources. Additionally, the Group conducts regular inspection on water and electricity meters to keep track of its resource consumption performance. If any unexpected high consumption of resources is found, investigation will be carried out to find out the underlying reasons and preventive measures will be taken.

## Energy Consumption

The primary energy consumption of the Group was the use of purchased electricity and towngas. Corresponding policies and measures have been formulated to manage energy conservation, which is one of the Group's ESG strategies. All employees must implement the measures established and take shared responsibility for the Group's overall energy efficiency. During the Reporting Period, the Group has implemented the following measures to reduce energy consumption:

- Proceed with the replacement of energy-saving lighting fixtures;
- Source energy-efficient equipment to ensure optimal functioning conditions and efficiency;
- Adjust the temperature of chiller and boiler with reference to the weather report from Hong Kong Observatory to avoid unnecessary wastage of resources;
- Switch on the Hotels' external wall light only from 5 p.m. to 11 p.m.; and
- Adopt unleaded gasoline to improve engine efficiency and reduce gasoline usage in the long-term.

Through these energy conservation measures, the employees' awareness of energy conservation was further enhanced.

The total energy consumption intensity of the Group decreased slightly by around 3.33% from approximately 0.030 MWh/room night in 2023 to approximately 0.029 MWh/room night in 2024.

Type of energy	Unit	2024	2023
Direct energy consumption – Gasoline <sup>1</sup>	MWh	284.96	213.40
Direct energy consumption – Towngas <sup>2</sup>	MWh	4,157.28	3,652.03
Indirect energy consumption – Electricity	MWh	20,400.66	18,073.78
Total energy consumption	MWh	24,842.89	21,939.21
Intensity	MWh/ room night	0.029	0.030

Summary of energy consumption performance:

Notes:

- 1. The amount of gasoline consumed was equivalent to 29,403 Litre and 22,020 Litre in 2024 and 2023 respectively; and
- 2. The amount of towngas consumed was equivalent to 14,966,208 MJ and 13,147,296 MJ in 2024 and 2023 respectively.

## Water Consumption

The Group actively promotes water-efficient practices. To reduce the amount of water used in the laundry, linen and towel will only be replaced under request for hotel guests who stay more than one night. Our policy encourages our hotel guests to contribute to a green environment together, while increasing the hotel guests' awareness of protecting the environment at the same time.

The total water consumption intensity of the Group increased by approximately 9.12% from approximately 0.274 m<sup>3</sup>/room night in 2023 to approximately 0.299 m<sup>3</sup>/room night in 2024. This is due to the increased water consumption by higher average number of visitors per hotel room since the grand opening of the Grand Bay View Hotel in August 2023, which accommodates more visitors with relatively larger hotel rooms in the Group.

Summary of water consumption performance:

Indicator	Unit	2024	2023
Total water consumption	m <sup>3</sup>	255,353	197,325
Intensity	m <sup>3</sup> / room night	0.299	0.274

Since the Group's business nature and operations are mainly based in Hong Kong, the issue in sourcing water fit for its purpose is not relevant to the Group.

## Packaging Materials

Since the Group has no industrial production or any factory facilities, it does not consume significant amounts of packaging material for finished products and hence the issue on the use of packaging materials is not material to the Group nor disclosed in this ESG Report.

## A3. The Environment and Natural Resources

As the operations of the Group are not directly involved in the use of natural resources and the Group does not exploit a significant amount of natural resources, the impact on the environment and natural resources from its operations was minimal during the Reporting Period. As part of its ongoing commitment to corporate social responsibility, the Group acknowledges its responsibility to minimise the negative environmental impacts of its operations, and achieve sustainable development to generate long-term values to its stakeholders and community.

## Sustainable Operation

Due to the business nature of the Group, its operation includes the provision of food and beverage services within the Hotels. As a responsible corporate, the Group is committed to protecting endangered animal species, and hence no shark fins and wild game meat are served. Moreover, the Group is dedicated to minimising plastic wastes whenever possible and exploring the possibilities to provide biodegradable toiletries to reduce negative environmental impacts.

### Indoor Air Quality

The Group places a great emphasis on maintaining a good indoor air quality as employees and hotel guests spend most of their time indoors. Indoor air quality in the workplace and hotel rooms is measured and monitored periodically. Air purifying equipment is adopted to filter air pollutants, contaminants and dust particles, and cleaning of air conditioning systems is regularly conducted to sustain good indoor air quality. Furthermore, smoking is prohibited in all guest rooms, restaurants, common areas and other indoor facilities of the Hotels to prevent second and lingering third-hand smoke.

## A4. Climate Change

Climate-related issues are affecting and posing threats to worldwide societies, and there is no exception for the Group's business. The Group mainly operates in Hong Kong, which is susceptible to extreme climate events such as typhoons and flooding. The Group understands the far-reaching impacts of climate change and therefore has established corresponding policies to combat climate change proactively.

### Governance

The Board and the ESG committee oversee the climate-related risks and opportunities during annual ESG Committee meetings, ensuring that the Group develops and implements effective strategies to address climate-related issues. In case of incidents induced by climate-related events, contingency meetings will be immediately held to discuss the issues and the handling procedures.

An ESG committee has been established and appointed to assist the Board in the oversight of the climate-related issues through reviewing, monitoring and implementing internal policies. In addition, the ESG committee is responsible for identifying ESG issues at operational level and reporting to the Board, coordinating and communicating with different departments, as well as maintaining management systems for data such as environmental and financial data. Climate-related incidents will also be immediately reported to the Board.

Meanwhile, the Board takes the responsibility for monitoring the Group's ESG performance through summaries and calculations inside ESG Reports and reviewing the effectiveness of the management approach, including the metrics, targets and action plans. During annual ESG Committee meetings, the Board is updated by the ESG committee with the latest climate-related risks and opportunities, and the progress of the ESG performance targets, as well as evaluation of the implementation effectiveness and possible improvement.

The Board engages with external consultants to stay updated on climate-related topics and relevant standards, and it participates in training programmes offered by professional organisations. This empowers the Group to develop strategies against climate-related risks and opportunities that align with its business operations, and ensures the Board oversees climate-related strategies and their implementation with the appropriate skills and competencies.

# Strategy

In addition to monitoring and reducing the environmental impacts induced by the Group, the potential risks and opportunities brought by climate change should also be considered. The Group classified the climate risks into short-term (1 year), medium-term (3 years) and long-term (10 years). The following table summarises the identified climate risks of the Group, the potential financial impacts and the corresponding actions that were taken by the Group:

Climate risks	Potential impacts	Corresponding actions
Physical risks		
Long-term acute physical risks: Increased frequency and severity of extreme weather events	<ul> <li>Reduction in revenue due to the closure of operating sites</li> <li>Loss of assets due to property damages</li> <li>Reduction in revenue due to the decreased number of tourists under extreme weather events</li> </ul>	<ul> <li>Monitor the weather constantly</li> <li>Formulate contingency plans</li> <li>Establish internal communication platforms for all employees to have clear and timely information on the contingency arrangement for evacuating guests and safeguarding themselves in cases of emergencies</li> <li>Establish external communication platforms for guests to disseminate timely and accurate information on weather forecasts and the status of operating sites</li> <li>Buy insurance for extreme weather conditions</li> </ul>
	• Increase in operating expenses due to increased demand for air- conditioners and hot water supply	<ul> <li>Procure energy-efficient air-conditioners and heaters for hot water supply</li> <li>Adopt the use of fans simultaneously with air- conditioners and moisture cooling method with water to remove heat in the air- conditioning system to carry out cooling effect more efficiently</li> </ul>

Transition risks		<ul> <li>Adopt the use of water tanks to store heated water at optimal temperature for supplying to customers, instead of continuous boiling of water, to carry out heating effect more efficiently</li> <li>Promote the concept of energy-conservation among guests and customers</li> </ul>
Medium-term legal risks: More stringent laws and regulations related to climate change	<ul> <li>Increase in operating expenses to comply with regulation changes</li> <li>Violation of laws due to the failure of full compliance with laws and regulations related to climate change</li> </ul>	<ul> <li>Monitor amendments in the requirements of current laws and regulations related to climate change</li> <li>Clarify the duty of the climate-related management team in familiarising the requirements of laws and regulation related to climate change</li> <li>Provide training to climate-related management team for better understanding of the requirements of laws and regulations related to climate change</li> <li>Seek independent consulting services for clarification and professional advice to comply with laws and regulations related to climate change</li> <li>Monitor implementation of environmental protection measures related to climate change</li> </ul>

#### Risk Management

The Group recognises the significance of implementing effective risk management for climate change to ensure safety of guests and staff, as well as providing high quality services. Therefore, the Board oversees and involves in the prioritisation process of climate-related risks.

To monitor and manage climate-related risks, the Group focuses on its operations and value chains to identify and assess climate-related risks. The Group also continuously monitors and reviews new risks and regulatory changes. To prepare a more comprehensive risk management process, the Group regularly reviews and enhances its approach to climate-related risk monitoring and management, while ensuring that climate-related risk management is supported by appropriate governance structure and accountability mechanisms.

Currently, the Group adopts the risk transfer and risk mitigation frameworks, which direct the potential financial impacts of climate-related risks to insurance company and implement measures to minimise the potential impacts of climate-related risks respectively.

#### Metrics and Targets

Along with the emission targets described in the section headed "Our Environment", the Group is committed to formulating targets in accordance with the Science-Based Targets initiative ("SBTi") to further monitor the progress of GHG emissions on a yearly basis.

### **OUR EMPLOYEES**

### **B1.** Employment

### Employment and Labour Practices

Human resources are valuable assets of the Group in supporting its development. Valuing the concerns and expectations of employees, the Group is committed to creating a fair and equitable workplace environment. Moreover, the Group has established standard policies and procedures, including but not limited to the Employee Handbook, and has an in-house counsel to ensure that it complies with employment-related laws and regulations.

In 2024, the Group complied with relevant laws and regulations relating to compensation and dismissal, recruitment and promotion, working hours, rest periods, equal opportunity, diversity, anti-discrimination, and other benefits and welfare that have a significant impact on the Group. The relevant laws and regulations include, but not limited to:

- Employment Ordinance (Cap. 57); and
- Minimum Wage Ordinance (Cap. 608).

As at 31 December 2024, there were a total of 595 full-time employees (31 December 2023: 562), following the resumption of labour supply in the hospitality industry after the pandemic effect. The gender, age group, employee category and geographical location of the employee are illustrated below:

	As at 31 December		
Number of employees	2024	2023	
By gender			
Male	336	304	
Female	259	258	
By age group			
Under 30 years old	65	48	
30-50 years old	234	231	
Over 50 years old	296	283	
By employee category			
Director	8	9	
Employee	587	553	
By geographical location			
Hong Kong	595	562	
Others			

The total employees' turnover was approximately 32.94% in 2024. The turnover of employees by gender, age group and geographical location of the employees are illustrated below:

Turnover rate (%)	2024	2023
By gender		
Male	28.57%	40.79%
Female	38.61%	47.29%
By age group		
Under 30 years old	38.46%	72.92%
30-50 years old	29.49%	49.35%
Over 50 years old	34.46%	34.28%
By geographical location		
Hong Kong	32.94%	43.77%
Others	-	

# Recruitment, Promotion, Remuneration and Dismissal

The Group recruits, remunerates and promotes its employees based on their merits, qualifications, competence, suitability and contributions. This ensures that all applicants and employees are treated and assessed fairly. The Group also fully respects legal employment rights, including rest days and leave entitlements, as stated in the Employee Handbook.

Moreover, the Group provides a competitive remuneration system under which remunerations and benefits are determined with reference to the market level. Salaries are reviewed and adjusted annually based on performance appraisals and current market trends. In addition to competitive salaries, employees enjoy various benefits such as year-end bonus, mandatory provident fund, medical insurance, various types of paid leave including annual leave, sick leave and maternity leave, and free meals provided during working hours. During the year under review, the Group provided discretionary bonus to its employees based on their performance. Additionally, the Group organises a regular event - "Star of the Quarter" for employees. For every quarter, each hotel votes for the best employee based on his/ her performance and the winning staff will receive a cash prize as reward for their contribution to the Hotels.

The Group strictly forbidden any unreasonable dismissal under any circumstances, and the dismissal process will only proceed if the dismissal is justified. Prior to dismissal, a warning letter will be sent, and official dismissal will only be considered when the employee receiving the warning letter fails to correct the issues raised.

The Group recognises the importance of communication between management staff and employees, hence it establishes communication channels and maintains close contact with its employees. Activities and trainings arranged for employees will be regularly posted on the notice board for notifying employees.

### Working hours and Rest periods

Employees of the Group benefit from reasonable working hours and rest periods. The Group ensures that working hours are appropriately arranged under the requirements of relevant labour protection laws, and employees are granted reasonable rest times as well.

## Diversity, Equal-opportunity, and Anti-discrimination

Employees of the Group enjoy equal opportunities in respect of recruitment, training and development, job advancement, and compensation and benefits. The Group ensures that employees are not discriminated against or deprived of such opportunities in relation to one's gender, ethnic background, religion, colour, sexual orientation, age, marital status, family status, retirement, disability, pregnancy or any other discrimination prohibited by applicable law. In addition, the Group understands the importance of cultural diversity for its development, and recruits employees with a wide range of ages, genders, and ethnicities.

### **B2.** Health and Safety

The Group is committed to providing a safe and healthy environment for its employees. The Group has demonstrated its determination in maintaining a safe and healthy workplace by including the "Security and Safety Rules" in its Employee Handbook. Furthermore, policies and measures have been implemented to ensure health and safety during the operations of the Group. To monitor the related policies and measures implemented, the Human Resources Department has been established to periodically review and improve the occupational health and safety measures adopted.

In 2024, the Group complied with the relevant laws and regulations relating to providing a safe working environment and protecting employees from occupational hazards that have a significant impact on the Group. The relevant laws and regulations include but not limited to:

- Occupational Safety and Health Ordinance (Cap. 509); and
- Employees' Compensation Ordinance (Cap. 282).

The Group has provided guidance on health and safety principles in the Employee Handbook for all the Hotels. In 2024 and 2023, the number of days lost due to work injury were 813 and 54 respectively. There were no work-related fatalities recorded in the past three years including the Reporting Period. In areas with a high risk of bodily injury, including kitchen areas and cloakrooms, where employees are frequently involved in manual handling operations such as lifting heavy objects, posters are displayed throughout these areas to remind workers of essential safety precautions.

In addition, the Group acknowledges the importance of hygiene when it comes to the preparation and provision of food and beverages to customers. To avoid contamination and the spread of germs among employees and customers, the Hotels provide guidance to their staff to always stay alert for the maintenance of cleanliness and tidiness of their working environment, as well as emphasising the importance of hand-sanitisation before handling food.

Furthermore, there are adequate first-aid kits and equipment around the Hotels. All safetyrelated supplies and equipment are under regular inspection to ensure that they are wellmaintained. The Group also conducts periodical building maintenance. For instance, fire safety system and CCTV system are examined on a regular basis. Regular fire drills are also carried out to further enhance the staff's emergency response and evacuation awareness.

Some dangerous areas, such as electric rooms, are always locked and clearly marked with danger signs outside the doors. Only qualified and authorised personnel are permitted to enter for specific purposes such as maintenance.

In general, most employees at back offices are at relatively lower risk in terms of health and safety concerns since they are not involved in labour-intensive work nor are they exposed to a hostile working environment. However, the Group recognises that sitting or standing for an extended period can also pose risks of bodily injury. To address this, employees are reminded of these risks via the notice board and encouraged to take regular breaks and do some stretching exercises from time to time.

## Other Health and Safety Measures

In the wake of the COVID-19 outbreak, the Group has become acutely aware of the risks posed by infectious diseases to employees' health and safety. To ensure a safe and healthy working environment, the Group has enhanced its hygiene practices and is always prepared with hygiene supplies. This includes maintaining an adequate stock of disinfection items, such as masks and hand sanitisers, to mitigate the risk of future outbreaks.

## **B3.** Development and Training

The Group acknowledges the contribution of its people for its continued success, and is committed to inspiring its talents towards delivering excellence. The Group organises a diversity of trainings on a regular basis to enhance employees' abilities to adapt to the changing environment. Practical trainings at the workplace are offered to employees to equip them with the relevant skillsets to enable them to provide efficient and quality services to customers.

During the Reporting Period, 462 employees, which is approximately 77.65% of the total employees, were trained. The following table summarises the data relating to trainings provided to employees:

	Percentage of employees trained (%)		Average training hours per employee (hours)	
	2024	2023 <sup>1</sup>	2024	2023
By gender				
Male	55.63%	53.06%	45.85	43.10
Female	44.37%	46.94%	42.95	47.43
By employee category				
Director	1.73%	1.97%	4.50	2
Employee	98.27%	98.03%	45.27	45.96

Notes:

1. The percentages of employees trained in 2023 have been recalculated and restated for a meaningful comparison with the figures in 2024.

As the Group understands that the contributions of its employees are crucial to its success, it supports lifelong learning of employees, and encourage employees at all levels and all ages to receive continuing education. Training programmes are updated in an ongoing manner and their contents are reviewed for improvement based on the feedback from staff and management. In 2024, the Group arranged a total of 20,589 hours of extensive training and orientation programmes, which aim to equip its employees with the proper attitude and required skills to achieve their fullest potential, empowering them to grasp the opportunities to become more productive and well-prepared in delivering the best quality services to customers and stakeholders.

### **B4.** Labour Standards

## Prevention of Child Labour and Forced Labour

During the recruitment process, child and forced labour are strictly prohibited as defined by laws and regulations. The Group actively scrutinises and prevents child labour through its comprehensive screening during recruitment. The screening involves checking the identity documents and working visas (if applicable) of candidates prior to any employment. In addition, work schedules are arranged with employees' preference to ensure that schedules are designed fairly, while those who work voluntarily will be provided with adequate rest. This allows employees to achieve work-life balance, so as to ensure service quality excellence.

In cases of required overtime work, employees do so of their own accord and overtime compensation is provided in alignment with relevant labour laws and regulations. If any individual below the legal working age is employed or any forced labour is discovered, corrective actions including terminating the employment and reporting to the relevant Governmental authorities will be taken immediately to rectify the situation.

In 2024, the Group complied with relevant laws and regulations relating to preventing child and forced labour that have a significant impact on the Group. The relevant laws and regulations include but not limited to the Employment Ordinance (Cap. 57).

### **OUR BUSINESS**

### **B5.** Supply Chain Management

With increasing environmental awareness in the society, the Group places more emphasis on the importance of managing the environmental and social risks associated to its supply chain. The Group has established supply chain management policies and procedures to ensure informed procurement choices are made responsibly. Environmental and social considerations have been incorporated in the policies of selecting and evaluating suppliers. The Accounting Department of the Group has been responsible for reviewing and improving the implementation of practices relating to identifying environmental and social risks along the supply chain periodically.

These supply chain management policies ensure that suppliers can compete transparently and fairly, and no suppliers will be differentiated or discriminated by the Group. Meanwhile, such policies also assist the Group in maintaining good business practices when selecting and evaluating its suppliers. In general, during the process of sourcing for new supplies, at least three suppliers will be shortlisted, while four or even more suppliers will be shortlisted for largescale projects or large volume procurements, in order to allow fair comparison before a final decision to be made by the management. The Accounting Department of the Group has been responsible for reviewing and improving the implementation of practices relating to engaging suppliers periodically.

In 2024, the Group engaged with a total of 328 major suppliers, which all went through regular evaluation and monitoring as stated above. The following table summarises data relating to the major suppliers of the Group:

Number of key suppliers (By region)	2024	2023
Hong Kong and China	326	382
Australia	1	1
Singapore	1	2
Europe	0	0
United States	0	0

Additionally, as the Group places a great emphasis on sustainable supply chain, the Purchasing Department of the Group is aware of the policy of the local government on recommended green product specifications, and hence prioritises suppliers with a sound environmental management system. By following guidelines published by multiple government agencies, the Purchasing Department will continuously improve the procurement system to select goods and services with a relatively lower environmental impact throughout the life cycle. The Accounting Department of the Group has been responsible for reviewing and enhancing the implementation of practices relating to the promotion of environmentally preferable products and services when selecting suppliers periodically.

## **B6.** Product Responsibility

The satisfaction of the Hotels' guests is essential for the long-term development of the Group. As a hotel and associated restaurant operator, creating a secure, hygienic, and comfortable environment for all guests and customers while ensuring quality services are in place to meet their expectations have always been the Group's core missions. Therefore, the Group is committed to complying with all requirements of the licences or permits granted, including the hotel, general restaurant and liquor licences. These requirements include the proper control of air, water and noise pollution, as well as fire safety, ventilation systems, sanitary fittings, water supply, drainage systems, and compliance with laws and regulations pertaining to building works.

The Group adheres to these requirements with the collaboration with its employees, many of whom are well-trained in the hospitality industry and possess extensive experience. The Group also stipulates many of these requirements and provides clear guidelines through a series of displays and notices around the Hotels, memos through emails, as well as in written forms in the Employee Handbook.

In 2024, the Group complied with relevant laws and regulations relating to health and safety, advertising, labelling and privacy matters relating to products and services provided and methods of redress that have a significant impact on the Group. The relevant laws and regulations include, but not limited to:

- Trade Descriptions Ordinance (Cap. 362);
- Copyright Ordinance (Cap. 528);
- Personal Data (Privacy) Ordinance (Cap. 486);
- Trade Marks Ordinance (Cap 559);
- Patent Ordinance (Cap 514); and
- Registered Design Ordinance (Cap 522).

Due to the Group's business nature of providing quality hospitality services, it has no products sold, shipped or transported which are subject to recalls for safety and health reasons. As a result, product recall is not applicable nor material to the Group, thus no relevant information or data is discussed in this ESG Report.

## Service Quality

The Engineering Department of the Hotels conducts regular inspections of the premises, boilers, and other operating equipment to ensure all equipment is in the optimal conditions and will not pose any threats to the well-being of its guests and employees. Moreover, the Group maintains a robust security system which includes a comprehensive CCTV system and security personnel on-duty to monitor the Hotels' premises 24 hours a day, 7 days a week. Unauthorised personnel will be questioned, and incidents of abnormality will also be promptly investigated.

To maintain good indoor air quality, smoking is prohibited in the Hotels' guest rooms, restaurants, common areas and other indoor facilities. These initiatives help create a health-conscious and smoke-free environment for customers, guaranteeing no second and lingering third-hand smoke can reach the guests during their stay in the Hotels.

## Complaint Handling

The Group has set up a series of procedures for handling complaints received from various channels, including telephone, email, and online booking websites. All complaints from our valuable customers will be appropriately recorded and handled by the customer service team of the Group. Complaints recorded will then be further investigated and followed-up promptly. This complaint handling process allows the Group to receive feedback about the services provided and address the concerns from customers professionally and timely. Moreover, this process enables the Group to develop preventive measures to avoid the recurrence of similar issues in the future, thereby enhancing the services provided by the Group.

In 2024, the number of service-related complaints received from customers was 14 (2023: 50). The significant decrease demonstrates the Group's determination and efforts in providing high quality services. The Group will continuously improve the facilities and services provided in the Hotels with reference to the complaints received, which are crucial elements for the Group to enhance services and move towards to developmental success.

### Customer Data Protection

The Information Technology Department of the Group has developed a comprehensive data protection policy and a mechanism to protect and maintain confidentiality of all corporate data and proprietary information. To adhere to the Personal Data (Privacy) Ordinance, Chapter 486 of the Laws of Hong Kong and protect the rights of employees, hotel guests and business partners, the access control protocol clearly specifies the limited access to a system or to physical or virtual resources. A comprehensive enterprise resource planning system for its finance-related operations is also implemented to provide further privacy and information confidentiality. The Group strictly abides by the regulation in the collection, usage, handling and storage of data to ensure data integrity and safety. Additionally, the data protection policy clearly identifies the responsibility of employees at different levels and departments with the handling of data for minimising risks on customer privacy. To ensure the secure data collection process and privacy, the Information Technology Department of the Group has been responsible for monitoring the consumer data protection and privacy policies.

## Protection of Intellectual Property

The Group does not hold any significant intellectual property assets. However, as a responsible hotel operator, the Group always respects intellectual property rights and is committed to complying with the applicable laws and regulations. The Group closely monitors its business activities which may involve the use of intellectual property rights, including the installation of computer programmes. All programmes operating in computers of the Hotels were purchased from licensed suppliers to ensure intellectual property rights are fully protected. In addition, the Group has implemented relevant policies to prohibit the use of illegal or unauthorised computer programmes on computers at the workplace. In case of any verified violation of intellectual property rights, the Group will take corrective actions promptly.

## Responsible Marketing

As a hospitality industry player, the Group focuses on providing quality hospitality services to customers and guests. Therefore, minimal marketing and advertising materials are produced for promotion. However, the Group still develops clear guidelines on advertising and marketing for employees to follow so as to ensure the delivery of accurate information to the public and no misleading or false information are in the Hotels' advertising or marketing materials.

## **B7.** Anti-corruption

The Group values and maintains integrity, honesty and fairness during its business operation. Any corruptions, frauds and all other behaviours violating work ethics are not tolerated.

In 2024, the Group complied with relevant laws and regulations relating to bribery, extortion, fraud and money laundering that have a significant impact on the Group. The relevant laws and regulations include, but not limited to:

- Prevention of Bribery Ordinance (Cap. 201); and
- Anti-Money Laundering and Counter-Terrorist Financing Ordinance (Cap. 615).

To prevent, detect and report all types of corruption, including bribery, extortion, fraud and money laundering, the Hotels have implemented strict policies to require all employees to adhere to the highest ethical standards and uphold a corporate culture of integrity and justice. They are expected to strictly follow the guidelines set forth in the Employee Handbook and behave with integrity, impartiality and honesty. During the Reporting Period, there were no concluded legal cases regarding corrupt brought against the Group nor its employees.

In 2024, training materials published by the Independent Commission Against Corruption on anti-corruption were distributed to directors and senior management of the Group through emails. Moreover, learning materials were circulated to general employees through notice boards in the Hotels to enhance their awareness and understanding of anti-corruption related knowledges.

Additionally, a Whistle-blowing Policy has been adopted by the Group to enable employees and external stakeholders, including customers and suppliers, to report concerns regarding any suspected or actual improprieties relating to the Group. Reports and complaints received will be handled promptly and fairly. The Accounting Department of the Group has been responsible for reviewing and updating the whistle-blowing measures and procedures regularly.

## **OUR COMMUNITY**

### **B8.** Community Investment

The Group is dedicated to supporting the public through community participation and contributions as part of its strategic development. To enhance its corporate culture and strengthen its commitment to corporate citizenship, the Group has established relevant policies and integrated human resources into its community management strategies. This approach reinforces its corporate social responsibility while supporting the Group's strategic growth.

## Community Participation

Society for the Prevention of Cruelty to Animals (Hong Kong) (SPCA HK)

The Group is committed to supporting animal protection initiatives. A donation box for SPCA HK is placed in the Best Western Hotel Causeway Bay. With the generous contributions from our customers, all donations will be forwarded to SPCA HK to support their efforts in rescuing and caring for abandoned animals.