



# 新礦資源有限公司

## NEWTON RESOURCES LTD

(Incorporated in the Cayman Islands with limited liability)

Stock Code: 1231



# 2024

## Environmental, Social and Governance Report

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## ABOUT THE REPORT

Newton Resources Ltd (the “Company” or “we”) and its subsidiaries (collectively, the “Group” or “our Group”) engage in the supply and distribution of iron ores and other commodities (the “Resources Business”). We present our 2024 Environmental, Social, and Governance (“ESG”) report (the “Report”), providing an annual update of our ESG performance. The main aim of this Report is to nurture continual partnerships and promote shared values with our stakeholders.

### Scope of the Report

The Report outlines the Group’s ESG management strategies and related achievements within our operational boundaries for the financial year ended 31 December 2024 (the “Reporting Period” or “2024”). It covers the ESG performance of the Group’s Resources Business and corporate functions at our Hong Kong offices. Unless stated otherwise, the scope of the Report is consistent with the previous year.

### Reporting Standard

The Report has been prepared in accordance with the ESG reporting guide (the “ESG Reporting Guide”) outlined in Appendix C2 of the Rules Governing the Listing of Securities on the Stock Exchange of Hong Kong Limited (“HKEx”). In its preparation, we adhere to the reporting principles of materiality, quantitative, balance, and consistency:

Reporting Principles	Description
Materiality	We have pinpointed the significant issues through internal discussions and engagement with key stakeholders. The outcomes are consolidated in the section titled “Materiality Assessment” in the Report.
Quantitative	Adhering to the ESG Reporting Guide, we have illustrated our ESG accomplishments by employing environmental and social key performance indicators (“KPIs”) using sound methodologies. This approach enables the assessment and validation of the effectiveness of our ESG policies and management systems.
Balance	We have calculated and presented the relevant data and information required by the environmental and social KPIs with reference to the ESG Reporting Guide. Sound methodologies were adopted as illustrated in the respective sections of the Report. We included year-over-year data comparisons to objectively present our ESG performance.
Consistency	The same methodologies, standards and reporting scope have been adopted for the Report, as compared to the previous year.

The Report has been reviewed and approved by the board of directors (the “Board”) of the Company.

## ABOUT THE REPORT *(Continued)*

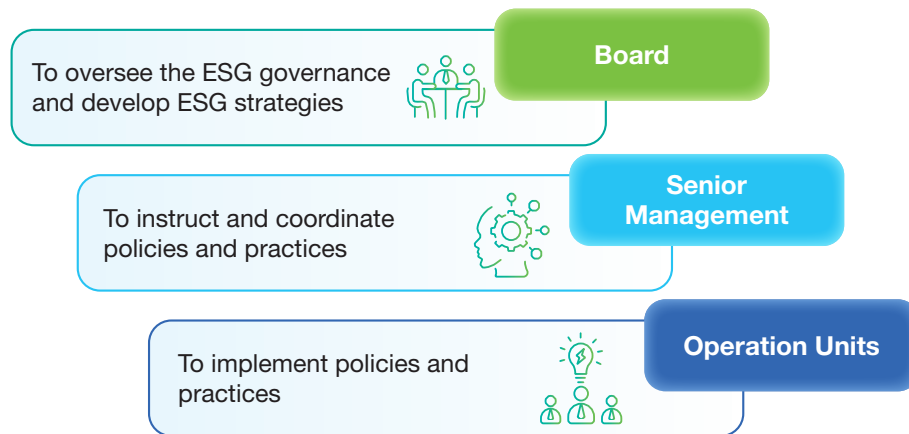
### Contact and Feedback

The Group is committed to fostering long-lasting relationships with key stakeholders and the community. Our ESG strategies are developed with the best interests of our stakeholders in mind. Therefore, we value your input on this Report and our sustainability efforts. If you have any feedbacks or recommendations, please share them with us by sending them to [esg@newton-resources.com](mailto:esg@newton-resources.com) or contacting us at (852) 2521-8168.

## OUR ESG RISK MANAGEMENT

Upholding a firm and efficient corporate governance framework, alongside strong risk management protocols, is essential in tackling ESG concerns. Our ESG governance structure incorporates the Board, senior management and operational units, each fulfilling a vital function.

The Board holds the primary responsibility for supervising ESG governance, shaping strategic choices, and assessing advancements. Furthermore, the Board has assigned the responsibility and answerability for aligning ESG strategies and policies to senior management. This delegation facilitates the implementation of ESG initiatives by staff within each operational unit, seamlessly integrating them into our day-to-day activities.



Our commitment to corporate governance focuses on transparency and complete accountability to all our stakeholders, aligning with our ethos of “Creating Shared Value”. To ensure a thorough grasp of our ESG priorities, the Group engages an independent consultant to conduct annual materiality assessments and ESG risk evaluations. These evaluation process includes obtaining feedback from various stakeholder groups, such as the board members and employees, to ascertain our critical ESG concerns. This stakeholder engagement process enables us to better understand their concerns and anticipations.

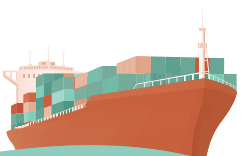


## OUR ESG RISK MANAGEMENT *(Continued)*

We recognise the importance of ESG factors in our business operations and have integrated ESG considerations into our risk management system. Our ESG risk evaluation includes the identification, assessment, and mitigation of ESG-related risks, allowing us to identify areas for enhancement. The results of the ESG risk assessment are then scrutinised and incorporated into the Group's business strategies, ensuring that our approach remains adaptable to evolving ESG challenges.

The following are some identified ESG risks and our responses to address them:

ESG Risks	Potential Impacts	Our Responses
Raw Material Availability Risk	Our Group understands the critical nature of raw material availability risk and its potential impact on our operations. Any disruptions or shortages in the supply of essential raw materials could significantly increase costs and ultimately impact our ability to meet customer demands. Recognising the importance of proactive measures, our Group is committed to addressing this risk with diligence and foresight.	In response to this challenge, our Group emphasises the importance of maintaining strong relationships with our suppliers and continuously monitoring market dynamics to anticipate any potential disruptions in the supply chain. By fostering collaborative partnerships with our suppliers and diversifying our sourcing strategies, we aim to mitigate the risks associated with raw material availability. The Group will also continue to identify and explore new sources of supply of iron ores and other commodities to further diversify the Group's product offerings.



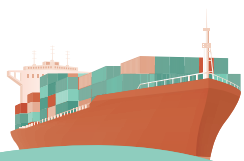
## OUR ESG RISK MANAGEMENT *(Continued)*

ESG Risks	Potential Impacts	Our Responses
Climate Physical Risk (Acute and Chronic)	<p>Our Group recognises the significant implications of climate physical risks, both acute and chronic, on our business operations and the broader environment. Acute risks, such as extreme weather events and natural disasters, can lead to sudden disruptions in our supply chain, damages to infrastructure, and potential safety hazards for our employees. Chronic risks, including gradual changes in temperature, sea level rise, and shifting weather patterns, pose long-term challenges that may impact iron ores supply and procurement and overall business sustainability.</p>	<p>In response to these climate physical risks, our Group is committed to implementing comprehensive risk assessment and management strategies. We prioritise the integration of climate resilience measures into our business planning to enhance our adaptive capacity and minimise vulnerabilities to extreme weather events and ongoing environmental changes. By proactively identifying potential threats and implementing preventive measures, we aim to minimise the impact of acute climate events on our operations.</p> <p>For chronic risks, our Group focuses on sustainability initiatives aimed at reducing our carbon footprint and enhancing resource efficiency. We focus on climate trends and engage in scenario planning to anticipate and mitigate the long-term impacts of climate change on our business activities.</p>



## OUR ESG RISK MANAGEMENT *(Continued)*

ESG Risks	Potential Impacts	Our Responses
Climate Transition Risk (Policy, Technology, Market and Reputation)	Our Group recognises that the climate transition risks, including the transition of policy, technology, market, and reputation considerations, present significant challenges and opportunities for our Group as we navigate the evolving landscape of climate change mitigation and sustainability. These risks can manifest in different ways, including regulatory changes, technological disruptions, market shifts, and reputational impacts, all of which have the potential to influence our business operations and strategic decision-making.	In response to these climate transition risks, we have integrated climate risk assessment into our risk management practices, allowing us to evaluate and manage climate risks and identify areas for improvement. We strongly encourage all our business partners to explore methods for enhancing resource efficiency. To ensure the continuous effectiveness of our climate change initiatives, we periodically review our Climate Change Policy and make necessary revisions.
Fraud Risk	Our Group understands that fraud risk poses a significant threat to the integrity, reputation, and financial stability of our Group. The potential impacts of fraud can be devastating, leading to financial losses, damage to the trust among stakeholders, and legal consequences. It is crucial for our Group to proactively identify, assess, and mitigate fraud risks to safeguard our assets, operations, and reputation.	In response to the threat of fraud, our Group implements stringent internal controls, policies, and procedures designed to prevent, detect, and respond to fraudulent activities effectively. The Group has established a Whistleblowing Policy to provide employees with a dedicated reporting channel and ensure the existence of a proper mechanism to handle the reported incidents. This policy encourages employees to report any concerns or allegations related to corruption, fraud, malpractice, or other misconduct within the Group.



## OUR ESG RISK MANAGEMENT *(Continued)*

ESG Risks	Potential Impacts	Our Responses
Business Continuity	Our Group understands that business continuity is essential for maintaining the resilience and sustainability of our Group in the face of disruptions, emergencies, or unforeseen events. The potential impacts of inadequate business continuity planning can be severe, including operational downtime, financial losses, reputational damage, and diminished customer trust. It is imperative for our Group to proactively address business continuity risks and establish business strategies to ensure the continuity of critical operations.	In response to the potential impacts of business continuity risks, our Group emphasises the development and implementation of comprehensive business continuity plan. These plan outlines clear roles and responsibilities for responding to emergencies aiming to minimise the impact of disruptions on our business activities.
Conflict of Interest Risk	Conflict of interest risk poses a significant threat to the integrity, transparency, and trustworthiness of our Group. The potential impacts of conflict of interest can include compromised decision-making, reputational damage, legal implications, and financial losses. It is essential for our Group to proactively identify, manage, and mitigate conflict of interest risk to uphold ethical standards, protect our reputation, and maintain the trust of our stakeholders.	<p>In response to the potential risks and impacts of conflict of interest, our Group has established transparent policies, guidelines, and procedures to prevent, detect, and address conflict of interest effectively. We emphasise a culture of integrity, transparency, and accountability across all levels of our Group to minimise the likelihood of conflict of interest arising and to ensure that decisions are made in the best interests of the Group and its shareholders.</p> <p>Clear disclosure requirements and conflict of interest declarations are integral components of our governance framework, enabling employees, executives, and board members to report potential conflict of interest promptly and transparently. By promoting open communication and a culture of accountability, we create a mechanism for identifying and addressing conflict of interest in a timely and appropriate manner.</p>





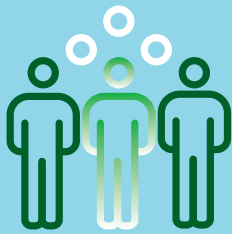
## OUR SUSTAINABILITY APPROACH

In line with our dedication to sustainability, we have developed our Sustainability Policy based on the Ten Principles of the United Nations Global Compact. We aim to enhance our governance standards and foster the well-being of our stakeholders across five areas:



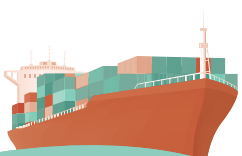
### Business Operations

- Create long-term value for our stakeholders through a focused strategy and by developing synergy among subsidiaries to connect business success with social progress
- Observe high standards of corporate governance and ensure the effectiveness of our risk management and internal control system
- Maintain high standards of ethics and integrity, and comply with all relevant laws and regulations in our business transactions and operations
- Deliver services and products that are safe and reliable, and do so in an environmentally responsible manner
- Encourage our suppliers and business partners to align with our sustainability standards and expectation to corporate sustainability to create a more sustainable supply chain



### Human Capital

- Provide a safe and caring working environment for our employees and strive to prevent work-related accidents, injuries and illnesses
- Promote equal opportunities and ensure that all employees are treated with dignity and respect regardless of age, gender, ethnicity and other forms of diversity
- Provide competitive, fair and equitable remuneration, and invest in professional development and training programmes to help our employees unleash their potential
- Promote a healthy work-life balance and create an inclusive, family-friendly workplace so as to improve employee satisfaction and productivity



## OUR SUSTAINABILITY APPROACH *(Continued)*



### Value Chain

- Prioritise collaboration with suppliers and business partners who can demonstrate their commitments to align with our sustainability principles
- Develop supplier engagement and monitoring procedures so as to manage environmental and social risks throughout our value chain
- Invest in technologies and innovative solutions to foster communication, safeguard customer privacy protection and protect customer health and safety so as to enhance customer experience



### Community Involvement

- Strive to enhance the quality of life of our stakeholders and create value for communities where we operate by leveraging our strengths and resources, and go beyond conventional corporate social responsibility framework
- Encourage and empower our employees to contribute to society by participating in volunteering works
- Raise employees' awareness on environmental and social issues



### Environment

- Comply with all relevant environmental laws and regulations, and strive to act beyond the legal requirements where possible and practicable
- Take every reasonable and practical measure to conserve resources and minimise waste in our operations
- Strive to manage the Group's direct and indirect impacts on environment
- Contribute to reducing our greenhouse gas ("GHG") emissions by investing in clean and energy-efficient technologies and by reducing our energy consumption
- Promote awareness, motivation and participation in environmentally-friendly initiatives among our employees as well as stakeholders in our supply chain



## STAKEHOLDER ENGAGEMENT

In alignment with our commitment to “Creating Shared Value”, we are committed to nurturing enduring and mutually beneficial relationships with our stakeholders. We have implemented different communication channels that facilitate our engagement in stakeholder interactions. By incorporating feedback from our stakeholders, we annually review our materiality matrix to comprehend the matters of importance to them. This practice assures that our ESG management approaches and policies resonate with their concerns.

The table below outlines the key stakeholder groups we have identified and the communication channels we utilise to interact with them:



### Investors and Shareholders

- Company website
- Share registrar
- Designated investor relations hotline and email
- Company's announcements and circulars
- Annual general meeting
- Annual and interim reports, ESG reports



### Customers

- Virtual meetings and on-site visits
- Periodic follow-up by account officers
- Customers' feedback collection



### Suppliers and Business Partners

- Virtual meetings and on-site visits
- Procurement meetings
- Regular contacts by procurement officers
- Suppliers' feedback collection
- Industry seminars



### Employees

- Training and orientation
- Email and notice board
- Performance appraisal
- Staff events



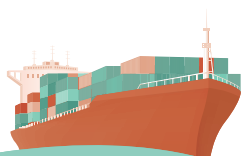
### Government Relations

- Forums, conferences, and workshops
- Information submission



### Community, Media and the Public

- Company website
- Company's announcements
- Community activities
- Charity donations



## MATERIALITY ASSESSMENT

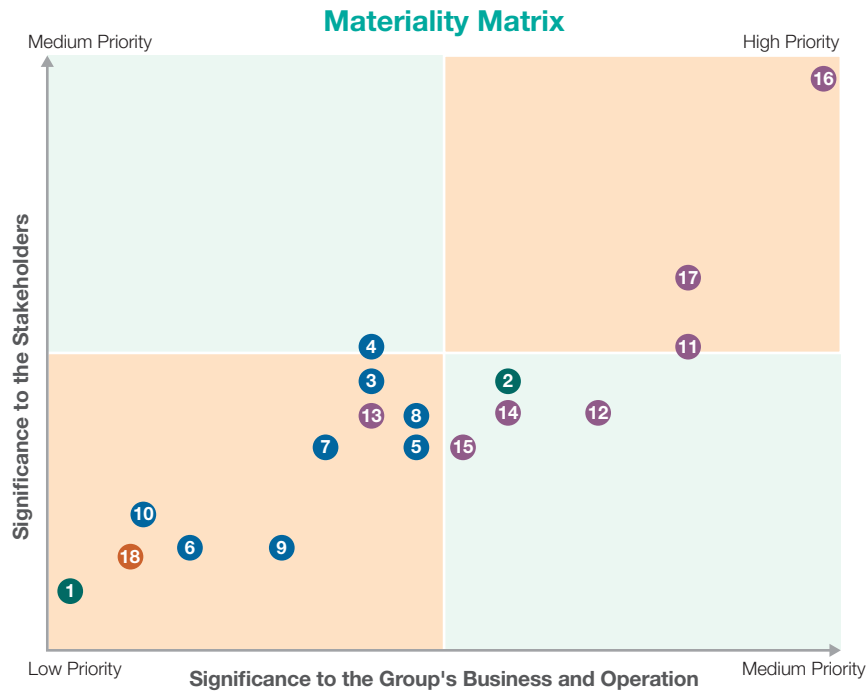
The materiality assessment plays a crucial role in selecting the ESG topics of utmost importance to the Group and our stakeholders. We gather viewpoints and feedback from diverse stakeholder groups via an online survey platform designed by an independent consultant, in addition to the communication channels previously highlighted. This inclusive method enables us to capture a wide spectrum of perspectives. Leveraging the valuable insights shared by our stakeholders, we shape the framework for our Report and formulate our ESG management strategies. This process empowers us to effectively address their concerns and expectations regarding ESG matters.

The top 18 ESG-related topics were determined based on our stakeholders' feedback. These topics were prioritised and shown in the materiality matrix on page 12 of this Report. The topics which fell in the upper right corner of the matrix were determined as the topics that mattered the most to the Group's business operations and our stakeholders as far as they were concerned.

			
Identification	Engagement	Analysis and Evaluation	Review
Create and categorise a list of potential ESG topics and identify key stakeholder groups.	Invite internal and external stakeholders to complete an online survey.	Evaluate and prioritise the most material ESG topics.	Review the results to determine the priority of the ESG topics for ESG report disclosure and future improvement.



## MATERIALITY ASSESSMENT *(Continued)*



Environment	Social	
	Employment	Operation
1. Decarbonisation	3. Labour rights	11. Customer satisfaction
2. Environmental compliance	4. Labour-management relations	12. Customer service quality and complaints handling
	5. Employee retention	13. Customer privacy and data protection
	6. Diversity and equal opportunity	14. Responsible supply chain management
	7. Non-discrimination	15. Fair operating practices on supplier
	8. Occupational health and safety	16. Business ethics
	9. Employee training	17. Socio-economic compliance
	10. Prevention of child labour and forced labour	<b>Community</b>
		18. Community investment

## MATERIALITY ASSESSMENT *(Continued)*

The materiality assessment process has facilitated the identification of the most critical ESG topics, enabling the integration of stakeholder concerns into our business decisions. Below is a table outlining the key concerns identified and the strategies we implemented to manage these issues effectively:

Key Concerns from Stakeholders	Our Responses	Sections
<b>Business Ethics</b>	Our Group holds the belief that maintaining mutual trust forms the bedrock of our relationships with stakeholders. To cultivate trust and assurance among our stakeholders, we have implemented comprehensive policies and robust systems aimed at protecting our reputation.	SUSTAINABLE OPERATIONS – Business Ethics
<b>Socio-economic Compliance</b>	Our Group conducts professional testing to verify product compliance, we demonstrate our dedication to meeting global standards and customer expectations. Through proactive quality checks and ongoing collaboration with customers and suppliers, we aim to address any quality concerns and maintain accountability throughout the supply chain.	SUSTAINABLE OPERATIONS – Supply Chain Management
<b>Customer Satisfaction</b>	Customer satisfaction is a top priority for our Group, and we are dedicated to ensuring that our products and services consistently meet the expectations of our customers. Our Group maintains stringent quality control measures to deliver products that meet the prescribed quality standards.	SUSTAINABLE OPERATIONS – Enhancing Customer Satisfaction
<b>Customer Service Quality and Complaints Handling</b>	Our Group has established feedback channels and complaint resolution processes to gather insights from customers, understand their preferences, and address any concerns promptly.	SUSTAINABLE OPERATIONS – Enhancing Customer Satisfaction – Feedback Mechanisms
<b>Environmental Compliance</b>	Our Group recognises the importance of environmental compliance as a critical aspect of our operations and encourages green practices.	ENVIRONMENTAL PROTECTION



## SUSTAINABLE OPERATIONS

Throughout all stages of our business operations, we prioritise the establishment of business resilience grounded in a strong moral and ethical framework. We understand that conducting business ethically is fundamental for sustained success. As a result, we have included ESG considerations in our supplier selection and monitoring processes. This integration ensures that our suppliers adhere to standards that align with our values. By adopting this approach, we collaborate with partners who share our values of sustainability, social responsibility, and ethical conduct.

Furthermore, we have implemented a professional quality control system to guarantee the supply of products and services that meet elevated quality benchmarks. This system is designed to ensure that our customers receive dependable and meticulously crafted offerings, reflecting our commitment to excellence and customer satisfaction.

### Business Ethics

The Group holds the belief that maintaining mutual trust forms the bedrock of our relationships with stakeholders. To cultivate trust and assurance among our stakeholders, we are steadfast in our dedication to upholding the utmost ethical standards across all facets of our business operations. We have implemented comprehensive policies and robust systems aimed at safeguarding and elevating the reputation of the Group.

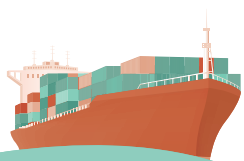
During the Reporting Period, the Group did not encounter any significant breaches of laws and regulations, including, among others, the Prevention of Bribery Ordinance of Hong Kong (Cap. 201), pertaining to bribery, extortion, fraud, and money laundering. Moreover, there were no legal cases concluded during the Reporting Period regarding corrupt practices brought against the Group or our employees.

### Anti-corruption

The Group consistently upholds a zero-tolerance stance towards any instances of corruption and business dishonesty. To ensure clarity and compliance with the expected standards of conduct, we have implemented an internal code of conduct. This code outlines the behaviours and actions anticipated from all employees, acting as a compass to prevent any decision-making that might deviate from our stakeholders' expectations.

We strictly prohibit all forms of corruption, including the solicitation, acceptance, or provision of illicit benefits or entertainment. Moreover, when selecting and evaluating our business associates, we appraise them to the same rigorous standards and principles of business ethics. This strategy is designed to safeguard our reputation and confirm that the anti-corruption practices of our business partners align with our dedication to ethical conduct.

During the Reporting Period, in order to maintain awareness and emphasise the importance of anti-corruption practices within the Group, the Company's directors and senior management participated in a webinar organised by the Hong Kong Independent Commission Against Corruption. Additionally, training materials on anti-corruption, business integrity and ethics from the Hong Kong Independent Commission Against Corruption were provided to our employees to upkeep the awareness and importance of anti-corruption within the Group.





## SUSTAINABLE OPERATIONS *(Continued)*

### Business Ethics *(Continued)*

#### Whistleblowing and Investigation

A crucial aspect of a strong internal control and risk management framework is an effective internal communication system. The Group has established a Whistleblowing Policy to provide employees with a dedicated reporting channel and ensure the existence of a proper mechanism for reporting irregularities. This policy encourages employees to report any concerns or allegations related to corruption, fraud, malpractice, or other misconduct within the Group. To protect the confidentiality of employees who report suspected cases of misconduct in good faith, their identities are strictly safeguarded.

Our aim in providing a secure and confidential reporting platform is to foster an environment where employees feel comfortable and empowered to raise such issues internally. Upon receiving a whistleblower report, the Board and our Audit Committee shall promptly review the matter, follow by a confidential investigation to be conducted by the Risk Management Department.

#### Data Protection and Privacy

We are committed to safeguarding the privacy of our stakeholders. The Group has implemented a Confidentiality Policy that prohibits our employees from sharing sensitive information, including customer and supplier data, and business plans, with unauthorised parties without prior approval from the Group. Each employee is also required to sign an agreement upon joining to confirm their understanding of our confidentiality policy. All employees must adhere to the policy by maintaining the confidentiality of the Group's sensitive information. During the Reporting Period, we did not identify any significant breaches of relevant laws and regulations concerning privacy and confidentiality matters.





## SUSTAINABLE OPERATIONS *(Continued)*

### Supply Chain Management

The Group is committed to promoting a more responsible and environmentally conscious approach within our supply chain management efforts. We prioritise the development of a sustainable and reliable supply chain by incorporating sustainability considerations into our supply chain management practices. This includes the implementation of sustainable procurement strategies and the establishment of a Supplier Code of Conduct. When assessing suppliers, we consider their ESG risk and performance to support ethical sourcing and reduce our carbon footprint across our operations. We acknowledge the vital role played by various suppliers, such as iron ore suppliers, vessel owners, shipping agents, professional firms, and other service providers, in our business. Therefore, we maintain open and active communication with them to ensure consistent compliance with our environmental and social standards. During the Reporting Period, we collaborated with two suppliers operating mines in South Africa and Australia, respectively.

We have adopted a Sustainable Procurement Policy that prioritises environmental and social factors in our supplier selection process, enabling us to uphold a sustainable supply chain. As part of our commitment to minimising our environmental impact, we carefully assess the lifecycle of products and services to mitigate any adverse environmental and social effects. We prioritise partnerships with suppliers who share our commitment to sustainable development, favouring those who demonstrate a strong commitment to sustainability through the implementation of sustainable policies and adherence to relevant ESG-related laws, as well as our Supplier Code of Conduct.

#### Sustainability Procurement Principles

##### Reducing environmental footprint

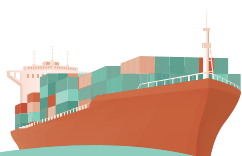


- ✓ Consider environmental impacts of the full product or service life-cycle
- ✓ Prioritise environmentally-friendly products when sourcing in the market
- ✓ Avoid unnecessary purchases and single-use disposable items
- ✓ Encourage reuse and recycling

##### Responsible and ethical sourcing



- ✓ Consider social impacts and costs of the full product or service life-cycle
- ✓ Prioritise products and services which are beneficial to the health and wellness of end-users as an alternative to conventional options
- ✓ Avoid products which pose potential environmental, safety, and health concerns
- ✓ Explore the feasibility of procurement from suppliers that support the local economy and/or socially vulnerable groups



## SUSTAINABLE OPERATIONS *(Continued)*

### Supply Chain Management *(Continued)*

#### Supplier Code of Conduct

##### Environmental guidelines



- ✓ Adhere to all applicable environmental codes and practices, laws and regulations in the jurisdictions where the suppliers operate
- ✓ Have all necessary environmental permits to conduct their business
- ✓ Adopt an effective environmental management system including measurement and reporting of their environmental impacts
- ✓ Utilise all appropriate and reasonable practices to preserve and protect the environment through proper waste management, pollution control and recycling

##### Social guidelines



- ✓ Practise business integrity in every aspect and avoid business misconduct and conflict of interest in their business
- ✓ Implement legitimate and equitable employment practices and set up effective internal communication channels
- ✓ Comply with applicable occupational safety and health legislation and requirements and maintain a safe and healthy working environment
- ✓ Educate and practise labour rights and freedoms, and avoid any behaviours of discrimination



## SUSTAINABLE OPERATIONS *(Continued)*

### Supply Chain Management *(Continued)*

As part of our commitment to sustainability in supplier management, we identify ESG risks and assess supplier performance during selection and evaluations. Suppliers must adhere to our Supplier Code of Conduct, covering Environment, Business Ethics, Labour Relations, Health and Safety, and Rights Protection. We evaluate ESG risks, and supplier performance associated with the products and services procured, allowing us to identify concerns and implement risk mitigation measures. Suppliers with higher ESG risks are encouraged to create a risk management plan. In cases where satisfactory improvement or compliance with our sustainability standards is lacking, collaboration with non-compliant suppliers may be reconsidered.

Our supplier management process also includes requirements for punctuality, quality, and overall performance. We conduct background checks and ongoing evaluations of suppliers' credibility and reliability. Suppliers should educate their employees on their rights and responsibilities in the Code of Conduct and establish sustainable procurement policies.

We prioritise transparency and accountability by benchmarking our sustainability performance against global practices and engaging stakeholders to evaluate its effectiveness. This policy is to ensure alignment with our sustainability goals.

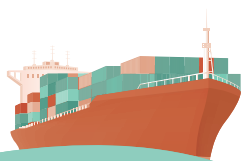
### Enhancing Customer Satisfaction

Establishing reliable relationships with stakeholders, particularly our customers and the broader community, is the most important to us. From the pre-sales phase to post-sales assistance, we are committed to delivering top-quality products, services, and support to our clients. We have set up communication channels to grasp their needs and sustain ongoing engagement with our customer base.

During the Reporting Period, there were no significant violations of pertinent laws and regulations concerning health, product safety, advertising, labelling, and privacy matters related to the Group's offerings and avenues for resolution.

### Quality Assurance

The Group ensures maintaining the quality and specifications of our products. Our products are required to be accompanied by quality certificates issued by reputable mines or suppliers. These certificates validate that our products adhere to strict quality standards and align with the expectations of our customers. To verify the composition of iron ores and ensure their compliance with recognised global standards, we conduct thorough physical tests and chemical analyses. These assessments enable us to confirm that the iron ores meet the necessary specifications. In addition to the initial testing and analysis, we perform quality checks on the items prior to their delivery to our clients. This additional step guarantees that the products meet the expected quality standards and fulfil the agreed-upon requirements. To address any potential quality concerns, we maintain close collaboration with both our customers and suppliers.



## SUSTAINABLE OPERATIONS *(Continued)*

### Enhancing Customer Satisfaction *(Continued)*

#### Quality Assurance *(Continued)*

As commodity supply typically poses little to no safety and health risks, the Group does not have specific product recall procedures in place. However, in the event of deviations in quality from the specified contractual standards, we utilise pre-agreed price formulas as a form of recourse. These formulas help offset the impact of quality discrepancies, ensuring a fair resolution for all parties involved.

During the Reporting Period, the Group did not receive any significant requests for sales returns, and no products that were sold or shipped were subject to recalls due to safety and health reasons.

#### Feedback Mechanisms

We maintain open channels for complaints accessible to all stakeholders, including a focus on customers. A structured process has been put in place for gathering customer feedback and complaints, ensuring prompt and effective resolution of any encountered issues. Through proactive listening to our customers, our goal is to elevate their satisfaction levels with our products and services.

The feedback and complaints received are carefully analysed to extract valuable insights into the strengths and areas needing improvement within our product line. This analysis serves as a compass, guiding our efforts to enhance the quality of our offerings in the future.

During the Reporting Period, the Group utilises pre-agreed price formulas as a form of recourse and did not receive any complaints from customers regarding our products.

#### Intellectual Property

Our Intellectual Property Policy aligns with the Intellectual Property (Miscellaneous Amendments) Ordinance 2000. The Group recognises the importance of safeguarding intellectual property (“IP”) rights, including copyrights, and upholds the rights of relevant copyright owners. This policy ensures compliance with the revised Intellectual Property Ordinance, serving to remind employees of the significance of such laws and to inform them about the required procedures for software installation. Additionally, it offers proper guidance on installing computer software and utilising other copyrighted works. Unauthorised use of any IP, such as inventions, designs, copyrighted works, and trademarks owned by the Group or external entities, is strictly prohibited without prior consent and approval.

To uphold compliance with IP laws and regulations, we conduct routine software audits. These audits assist us in monitoring software usage and verifying that all software is appropriately licensed. Penalties have been established to reinforce adherence to IP regulations and discourage any instances of non-compliance.

During the Reporting Period, the Group had no knowledge of any breaches of the relevant laws and regulations concerning IP rights.

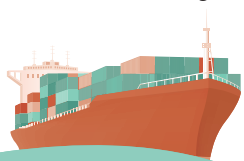


## EMPLOYEE WELFARE

The Group acknowledges the pivotal role of our staff in value creation and places significant emphasis on their well-being and growth. We are dedicated to cultivating a nurturing, safe, and encouraging work environment that empowers our employees to actively contribute to the Group's advancement and achievements. Alongside adhering to local labour regulations, our employment practices align with the principles outlined by the United Nations Global Compact. At the end of the Reporting Period, the Group had 33 employees in Hong Kong and Mainland China, with a turnover rate of approximately 15%. The table below presents the employment statistics of the Group as of the end of the Reporting Period:

		2024	2023
<b>Total number of employees</b>		<b>33</b>	23
By gender	Male	<b>52%</b>	43%
	Female	<b>48%</b>	57%
By age group	Below 30	<b>12%</b>	4%
	30 to 50	<b>42%</b>	48%
	Over 50	<b>46%</b>	48%
By employment type	Full-time	<b>91%</b>	91%
	Part-time	<b>9%</b>	9%
By geographical region	Hong Kong	<b>94%</b>	91%
	Mainland China	<b>6%</b>	9%
<b>Employee turnover rate<sup>1</sup></b>			
Total		<b>15%</b>	17%
By gender	Male	<b>6%</b>	0%
	Female	<b>25%</b>	17%
By age group	Below 30	<b>25%</b>	0%
	30 to 50	<b>29%</b>	17%
	Over 50	<b>0%</b>	0%
By geographical region	Hong Kong	<b>16%</b>	17%
	Mainland China	<b>0%</b>	0%

<sup>1</sup> Employee turnover rate was calculated by dividing the number of employees leaving the Group in 2024 and 2023 by the average number of employees of the Group for 2024 and 2023, respectively.



## EMPLOYEE WELFARE *(Continued)*

### Health and Safety in the Workplace

The health, safety, and well-being of our employees are one of the Group's foremost priorities. We are dedicated to being a caring employer and strive to establish a work environment that is not only safe but also conducive to good health. We aim to advocate for work-life balance and prioritise employee well-being.

To manage health and safety risks efficiently, the Group has adopted a variety of practices that cover different areas. These practices include:

Health and Safety Practices	
	<b>Occupational health and safety</b> <ul style="list-style-type: none"> <li>✓ Incorporate health and safety risk into our risk management and implement health and safety practice</li> <li>✓ Report all health and safety incidents properly and timely for follow-up and remedial actions</li> <li>✓ Conduct in-depth analysis on the reported incidents if applicable</li> </ul>
	<b>Employee engagement</b> <ul style="list-style-type: none"> <li>✓ Communicate closely with the employees on our health and safety guidelines and standards, and provide training accordingly</li> <li>✓ Organise information sharing programmes on improving employees' health and safety practice</li> <li>✓ Participated in a walking challenge under "10,000 Steps a Day" campaign organised by the Department of Health to raise awareness on the health benefits of walking in daily life</li> </ul>
	<b>Hygienic workplace</b> <ul style="list-style-type: none"> <li>✓ Keep our offices clean and tidy, and carry out cleaning of carpet and air-conditioner regularly</li> </ul>
	<b>Protecting employees' health</b> <ul style="list-style-type: none"> <li>✓ Provide eligible employees with medical benefits and insurance</li> </ul>
	<b>Business Continuity Plan</b> <ul style="list-style-type: none"> <li>✓ Provide a framework to deal with and measures to mitigate from a disruptive incident such as outbreaks of contagious diseases, fire, and cyber attacks</li> </ul>



## EMPLOYEE WELFARE *(Continued)*

### Health and Safety in the Workplace *(Continued)*

The Group adheres to all applicable health and safety laws and regulations. During the Reporting Period, we were not aware of any material breach of relevant laws and regulations in Hong Kong pertaining to the provision of a safe working environment and protection of employees from occupational hazards such as Occupational Safety and Health Ordinance (Cap.509) and Employees' Compensation Ordinance (Cap. 282). There was no work-related injury cases or fatalities as well as lost days due to injury in the past three years including the Reporting Period.

### Fair and Equal Workplace

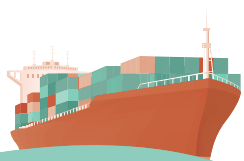
Employees are at the core of our success and are considered the most valuable assets of the Group. Establishing a strong connection with our employees to understand their needs is a top priority for us. To inspire and motivate our workforce, we provide a dynamic work environment and competitive compensation and benefits that align with market standards. During the Reporting Period, the Group was not aware of any significant breaches of relevant laws and regulations, including the Employment Ordinance (Cap. 57) of Hong Kong, that would have had a substantial impact on the Group in areas such as compensation and dismissal, recruitment and promotion, working hours, rest periods, equal opportunities, diversity, anti-discrimination, and other benefits and welfare.

### Benefits

The Group regularly reviews and adjusts our remuneration policy and human resources allocation to ensure alignment with our development strategies. We highly value the contributions of our employees and acknowledge their efforts by offering attractive and competitive remuneration packages. These packages are tailored by taking into consideration factors such as job nature and current market conditions. In recognising individual performance and industry standards, year-end bonuses and share options are assessed and provided accordingly. Performance evaluations play a pivotal role in determining these incentives. Additionally, we adhere to local laws and regulations by contributing to the Mandatory Provident Fund or similar retirement schemes. Moreover, we offer a comprehensive employee benefits scheme, including medical and other insurance coverage, to protect the health and security of our employees and their families.

### Work-life Balance

We acknowledge the significance of work-life balance in bolstering the overall well-being of our employees, we go beyond merely providing statutory holidays. Our additional leave benefits, which include allowances such as marriage leave and birthday leave, are tailored to support our employees in managing their personal lives effectively. These provisions empower our team members to take necessary time off for pivotal life events, ensuring that they can balance their professional responsibilities with personal commitments. In our commitment to fostering mental well-being and fostering a strong sense of community within our workforce, we hosted a diverse range of social events for our employees during the year. We believe our social events serve as platforms for our employees to come together, celebrate milestones, and cultivate a supportive and inclusive work environment. For festive occasions like Chinese New Year and Christmas, joyous luncheons were arranged, these events exemplify our dedication to creating a harmonious workplace that values both professional growth and personal fulfilment.



## EMPLOYEE WELFARE *(Continued)*

### Training and Development

We are committed to nurturing and empowering the growth of our employees by enhancing their job-related skills and expertise through comprehensive training initiatives. Our investment in skill development is evident through the diverse range of training opportunities we offer. Employees have the chance to attend seminars and training programmes that are not only pertinent to their roles but also aligned with their individual professional aspirations.

To further support continuous learning and skill enhancement, eligible employees are granted access to education subsidies. These subsidies are designed to incentivise and encourage our workforce to actively pursue ongoing education and upskilling opportunities. Moreover, we provide a spectrum of internal and external training activities that are meticulously tailored to address the specific needs and development areas of our employees. By prioritising training and skill development, we aim to equip our team members with the tools and knowledge needed to excel in their roles and advance their careers effectively. Our training data are summarised in the table below:

	2024		2023	
Total number of hours of training received by employees	224		129	
	Average hours of training per employee	Percentage (%) of employees who received training <sup>2</sup>	Average hours of training per employee	Percentage (%) of employees who received training <sup>2</sup>
By gender				
Male	8.8	88%	4.4	100%
Female	4.6	88%	6.6	100%
By employment category				
Senior Management	20.1	100%	12.4	100%
Middle Management	8.4	75%	11.3	100%
General Staff	0.9	89%	1.0	100%
Overall	6.8	88%	5.6	100%

<sup>2</sup> It is calculated by dividing the employees received training in the specified category by the total number of employees in the specified category at the end of 2024 and 2023, respectively.





## EMPLOYEE WELFARE *(Continued)*

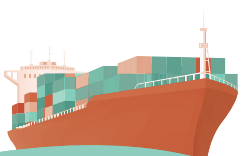
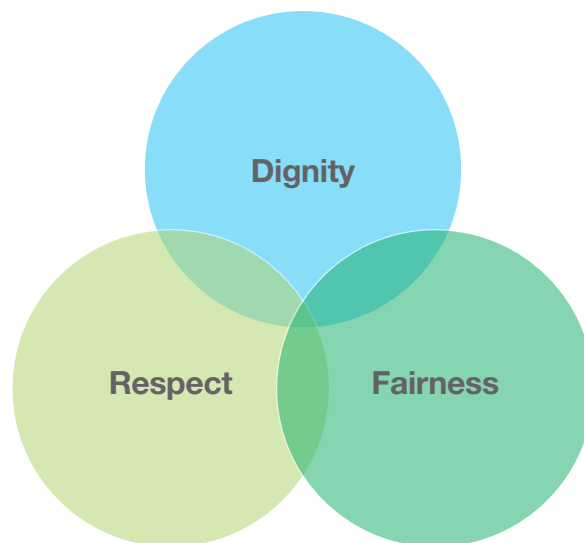
### Training and Development *(Continued)*

In addition to our comprehensive training programmes, we have implemented a structured mentoring scheme within the Group. This initiative aims to provide invaluable guidance and support to employees as they navigate job-related challenges, while also fostering strong interpersonal relationships within the Group. Experienced mentors actively engage with their mentees, sharing insights and offering practical advice to help them surmount obstacles and achieve their professional goals. This mentorship dynamic not only contributes to a culture of effective learning and collaboration but also cultivates a supportive environment where individuals can thrive. During employee appraisals, mentors play a crucial role by providing constructive feedback to their mentees. This feedback loop is integral in assessing promotion opportunities and other avenues for career advancement, ensuring that progression within the organisation is closely tied to mentorship-driven developmental outcomes. By integrating mentorship into our appraisal process, we uphold a transparent and merit-based approach to recognising and rewarding employee growth and success.

### Human and Labour Rights

We are committed to fostering a work environment that embraces diversity, inclusion, and social responsibility. We adhere strictly to all pertinent statutory regulations concerning work hours, holidays, remuneration, and codes applicable in Hong Kong and Mainland China, where applicable. Our commitment goes beyond compliance, we strive to ensure equal opportunities, uphold labour rights, and foster a culture of fairness in our workplace. We prohibit the use of child labour and forced labour within both our Group and supply chain.

At the core of our ethos lies the unwavering commitment to treat all stakeholders with dignity, fairness, and respect. Every member of our staff is entrusted with the responsibility to foster a workplace culture rooted in respect, without any form of harassment, intimidation, bias, or discrimination.



## EMPLOYEE WELFARE *(Continued)*

### Human and Labour Rights *(Continued)*

#### Diversity and Inclusiveness

We expect all employees to embrace principles of Dignity, Respect, and Fairness in their interactions with one another and with all stakeholders. Our Group remains steadfast in ensuring that decisions regarding recruitment, training, compensation, and advancement are solely based on merit and qualifications.

We actively promote mutual respect and maintain zero tolerance towards any discriminatory, harassing, intimidating, or violent behaviour. Our stance against discrimination is resolute, encompassing factors such as race, ethnicity, nationality, religious and political beliefs, gender, age, sexual orientation, marital and family status, disability, and medical condition. Any form of harassment based on sex, disability, family status, or race is unequivocally condemned. Our policies encompass details on internal communication channels and the upholding of freedom of association, with a firm commitment to swiftly addressing and resolving complaints in a timely manner.

The Group complies with all applicable employment and anti-discrimination laws and regulations. We were not aware of any material breach of relevant laws and regulations including among others, the Employment Ordinance (Cap. 57), Sex Discrimination Ordinance (Cap. 480), Disability Discrimination Ordinance (Cap. 487), Family Status Discrimination Ordinance (Cap. 527) and Race Discrimination Ordinance (Cap. 602).

#### Child and Forced Labour

We have implemented a strict policy that prohibits all forms of illegal labour, including but not limited to child labour and the employment of illegal immigrants. Any form of human trafficking is strictly forbidden. Our Human Rights Policy is adhered to throughout our employment and operational processes.

In addition, we also maintain close communication with our suppliers to ensure that they adhere to our standards. We work closely with them to ensure that they share our values and commitment to preventing child and forced labour.

During the Reporting Period, the Group was not aware of any identified case regarding child and forced labour, as well as material non-compliance with laws and regulations, including among others, the Employment Ordinance (Cap. 57) of Hong Kong, relating to child and forced labour, Immigration Ordinance (Cap. 115, Laws of Hong Kong) and Crimes Ordinance (Cap. 200, Laws of Hong Kong).



## EMPLOYEE WELFARE *(Continued)*

### Human and Labour Rights *(Continued)*

#### Freedom of Association and Collective Bargaining

We recognise and respect each employee's right to form, join, or refrain from joining any association or labour union of their choice. The Group is committed to fostering an environment that supports this freedom, allowing our staff to engage in collective representation.

In instances where employees are represented by associations or labour unions, the Group is committed to engaging in good-faith negotiations with their representatives. We believe that open dialogue and collaboration with employee representatives are essential for fostering a positive workplace culture and addressing employee concerns effectively.

Through these practices, we aim to uphold the rights of our employees and promote a respectful and inclusive work environment that values their voices and contributions.

## ENVIRONMENTAL PROTECTION

Recognising the urgent need to address climate change, we are committed to operating as a sustainable Group that takes proactive steps to combat global warming. Through our Green Office Policy and Climate Change Policy, we have integrated environmentally conscious principles into our operations to mitigate our ecological footprint. Active participation in green events underscores our commitment to raising environmental awareness and promoting sustainable practices within our business.

During the Reporting Period, the Group did not have material non-compliance with laws and regulations relating to air and GHG emissions, discharges into water and land, generation of hazardous and non-hazardous waste, and use of resources in Hong Kong. There was no issue in sourcing water that is suitable for use in the Group's operations in Hong Kong.

### Green Operations

#### Green Office Policy

Our Group is committed to reducing our environmental footprint and promoting sustainability in our office operations. Our Green Office Policy serves as a cornerstone of our commitment to environmental responsibility and resource efficiency. Our Green Office Policy is aligned with and exceeds the requirements set forth in the Green Office Management Guidelines<sup>3</sup>. We regularly review our policy to ensure it remains current and effective in addressing emerging environmental challenges and enables the Group to utilise resources, such as energy, water and other materials efficiently. By implementing this comprehensive approach to sustainability, our Group demonstrates its commitment to reducing our ecological footprint by, among others, lowering our GHG emissions and increasing our energy usage efficiency as far as practicable while contributing to a more environmentally conscious business community.

<sup>3</sup> <https://www.gov.hk/en/residents/environment/public/green/greenoffice.htm>



## ENVIRONMENTAL PROTECTION *(Continued)*

### Green Operations *(Continued)*

#### Climate Change Policy

Our Group has developed a comprehensive Climate Change Policy that includes the practices applied internally within our business operations and throughout our supply chain. To ensure a thorough understanding of climate-related risks and opportunities, we regularly incorporate and analyse climate risk within our risk management processes. This enables us to review and revise our policy accordingly while identifying and implementing appropriate measures to minimise potential impacts and capitalise on emerging opportunities. We consider risks associated with climate change and extreme weather events, integrating them into our business continuity plans and reduction targets.

To improve resilience and mitigate environmental impacts, we actively promote resource conservation and green habits through training initiatives and various green projects. We are exploring the utilisation of clean and renewable energy sources in our operations and working with suppliers to adopt similar practices when feasible. Looking ahead, we are committed to maintaining low levels of GHG emissions, energy consumption, water consumption, and waste generation. By focusing on these areas, we aim to continually minimise our environmental footprint and contribute to a sustainable future.

#### Green Events

To practise environmental sustainability in our daily operation, we participated in the “No Air Con Night” organised by Green Sense during the Reporting Period.

### Combating Climate Change

Our Group is firmly committed to combating climate change through the implementation of effective best practices that minimise risks and impacts on our business operations. We prioritise transparency and accountability in our monitoring and reporting processes.

To proactively address climate risks and seize opportunities, we have integrated climate risk assessment into our risk management practices, allowing us to evaluate and manage climate risks and identify areas for improvement. We strongly encourage all our business partners to explore methods for enhancing the resource efficiency of their water and energy usage. To ensure the continuous effectiveness of our climate change initiatives, we periodically review our Climate Change Policy and make necessary revisions.



## ENVIRONMENTAL PROTECTION *(Continued)*

### Environmental Performance

During the Reporting Period, our Group primarily operates in office; therefore, we did not generate significant amounts of hazardous and non-hazardous waste. Our environmental data for this period are summarised in the table below:

KPI	Unit	2024	2023
Direct GHG emissions (Scope 1) <sup>4</sup>	Tonne of carbon dioxide equivalent ("tCO <sub>2</sub> e")	20.44	17.75
Energy indirect GHG emissions (Scope 2) <sup>5</sup>	tCO <sub>2</sub> e	20.06	20.06
Other indirect GHG emissions (Scope 3) <sup>6</sup>	tCO <sub>2</sub> e	82.08	59.11
<b>Total</b>	tCO <sub>2</sub> e	<b>122.58</b>	96.92
Intensity	tCO <sub>2</sub> e per full-time employee ("FTE")	4.09	4.21
<b>Electricity</b>	kWh'000	28.25	28.25
	GJ	101.70	101.70
Intensity	kWh'000 per FTE	0.94	1.23
<b>Paper</b>	Tonne	0.01	0.43
Intensity	Tonne per FTE	0.01	0.02
<b>Water</b>	m <sup>3</sup>	20	25.00
Intensity	m <sup>3</sup> per FTE	0.67	1.09

There was an increase in the other indirect GHG emission during the Reporting Period as the Group had more on-site visit to the customers and end-users to foster the swift sales of iron ores.

<sup>4</sup> Scope 1: Direct GHG emissions generated from the use of unleaded petrol by the Group's vehicle.

<sup>5</sup> Scope 2: Energy indirect GHG emissions were caused by the use of purchased electricity. The calculation was based on the published emission factors of Carbon Calculator by The Hongkong Electric Company, Limited.

<sup>6</sup> Scope 3: Other indirect GHG emissions were caused by business air travels by the Group's employees, water consumed for electricity generation and methane gas generated in the paper disposal. The calculation had made reference to GHG Conversion Factors for Company Reporting published by the UK Government and the published emission factors of the "How to prepare an ESG Report Appendix 2: Reporting Guidance on Environmental KPIs" published by HKEx.

## COMMUNITY SUPPORT

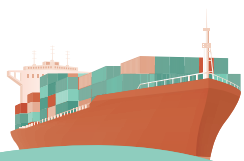
Our Group is committed to supporting our local community and prioritising the health and well-being of its residents. This year, our focus areas of contribution include environmental concerns, health and safety, sports, and poverty alleviation. We actively participate in various fundraising and charity events organised by local charitable organisations, aiming to raise awareness about environmental issues and promote sustainable practices.

During the Reporting Period, we participated in several charitable activities and made a total donation of approximately US\$8,000 (2023: approximately US\$13,000) by the Group for charitable causes. These events included Earth Hour 2024, Dress Casual Day 2024 organised by The Community Chest Of Hong Kong and the 17th Anniversary Annual Charity Dinner hosted by the Ten Percent Donation Scheme Foundation.



## HKEx APPENDIX C2 ESG REPORTING GUIDE INDEX

HKEx ESG Reporting Guide General Disclosures & KPIs		Explanation/Reference Section
<b>Aspect A: Environmental</b>		
<b>A1 Emissions</b>	<p>Information on:</p> <p>(a) the policies; and</p> <p>(b) compliance with relevant laws and regulations that have a significant impact on the issuer</p> <p>relating to air and greenhouse gas emissions, discharges into water and land, and generation of hazardous and non-hazardous waste.</p> <p>Note:</p> <p>Air emissions include nitrogen oxides, sulphur oxides, and other pollutants regulated under national laws and regulations.</p> <p>Greenhouse gases include carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons and sulphur hexafluoride.</p> <p>Hazardous wastes are those defined by national regulations.</p>	ENVIRONMENTAL PROTECTION
<b>KPI A1.1</b>	The types of emissions and respective emissions data.	ENVIRONMENTAL PROTECTION – Environmental Performance
<b>KPI A1.2</b>	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).	ENVIRONMENTAL PROTECTION – Environmental Performance
<b>KPI A1.3</b>	Total hazardous waste produced (in tonnes) and, where appropriate, intensity (e.g. per unit of production volume, per facility).	Not applicable – our business activities mainly took place in office, which does not generate significant amount of hazardous waste during the Reporting Period
<b>KPI A1.4</b>	Total non-hazardous waste produced (in tonnes) and, where appropriate, intensity (e.g. per unit of production volume, per facility).	Not applicable – our business activities mainly took place in office, which does not generate significant amount of non-hazardous waste during the Reporting Period
<b>KPI A1.5</b>	Description of emission target(s) set and steps taken to achieve them.	ENVIRONMENTAL PROTECTION



## HKEx APPENDIX C2 ESG REPORTING GUIDE INDEX *(Continued)*

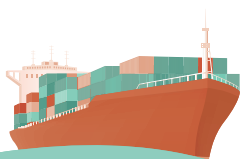
HKEx ESG Reporting Guide General Disclosures & KPIs		Explanation/Reference Section
<b>KPI A1.6</b>	Description of how hazardous and non-hazardous wastes are handled, and a description of reduction target(s) set and steps taken to achieve them.	Not applicable – our business activities mainly take place in office, which does not generate significant amount of hazardous and non-hazardous waste during the Reporting Period
<b>A2 Use of Resources</b>	<p>Policies on the efficient use of resources, including energy, water and other raw materials.</p> <p>Note:</p> <p>Resources may be used in production, in storage, transportation, in buildings, electronic equipment, etc.</p>	ENVIRONMENTAL PROTECTION
<b>KPI A2.1</b>	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).	ENVIRONMENTAL PROTECTION – Environmental Performance
<b>KPI A2.2</b>	Water consumption in total and intensity (e.g. per unit of production volume, per facility).	ENVIRONMENTAL PROTECTION – Environmental Performance
<b>KPI A2.3</b>	Description of energy use efficiency target(s) set and steps taken to achieve them.	ENVIRONMENTAL PROTECTION
<b>KPI A2.4</b>	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.	ENVIRONMENTAL PROTECTION
<b>KPI A2.5</b>	Total packaging material used for finished products (in tonnes), and, if applicable, with reference to per unit produced.	Not applicable – the use of packaging materials is immaterial due to the Group's business nature
<b>A3 The Environment and Natural Resources</b>	Policies on minimising the issuer's significant impacts on the environment and natural resources.	ENVIRONMENTAL PROTECTION – Green Operations
<b>KPI A3.1</b>	Description of the significant impacts of activities on the environment and natural resources and the actions taken to manage them.	ENVIRONMENTAL PROTECTION – Green Operations
<b>A4 Climate Change</b>	Policies on identification and mitigation of significant climate-related issues which have impacted, and those which may impact, the issuer.	ENVIRONMENTAL PROTECTION – Combating Climate Change
<b>KPI A4.1</b>	Description of the significant climate-related issues which have impacted, and those which may impact, the issuer, and the actions taken to manage them.	ENVIRONMENTAL PROTECTION – Combating Climate Change





## HKEx APPENDIX C2 ESG REPORTING GUIDE INDEX *(Continued)*

HKEx ESG Reporting Guide General Disclosures & KPIs		Explanation/Reference Section
<b>Aspect B: Social</b>		
<b>B1 Employment</b>	<p>Information on:</p> <p>(a) the policies; and</p> <p>(b) compliance with relevant laws and regulations that have a significant impact on the issuer</p> <p>relating to compensation and dismissal, recruitment and promotion, working hours, rest periods, equal opportunity, diversity, anti-discrimination, and other benefits and welfare.</p>	EMPLOYEE WELFARE – Fair and Equal Workplace
<b>KPI B1.1</b>	Total workforce by gender, employment type (for example, full- or part-time), age group and geographical region.	EMPLOYEE WELFARE
<b>KPI B1.2</b>	Employee turnover rate by gender, age group and geographical region.	EMPLOYEE WELFARE
<b>B2 Health and Safety</b>	<p>Information on:</p> <p>(a) the policies; and</p> <p>(b) compliance with relevant laws and regulations that have a significant impact on the issuer</p> <p>relating to providing a safe working environment and protecting employees from occupational hazards.</p>	EMPLOYEE WELFARE – Health and Safety in the Workplace
<b>KPI B2.1</b>	Number and rate of work-related fatalities occurred in each of the past three years including the reporting year.	EMPLOYEE WELFARE – Health and Safety in the Workplace
<b>KPI B2.2</b>	Lost days due to work injury.	EMPLOYEE WELFARE – Health and Safety in the Workplace
<b>KPI B2.3</b>	Description of occupational health and safety measures adopted, and how they are implemented and monitored.	EMPLOYEE WELFARE – Health and Safety in the Workplace



## HKEx APPENDIX C2 ESG REPORTING GUIDE INDEX *(Continued)*

HKEx ESG Reporting Guide General Disclosures & KPIs		Explanation/Reference Section
<b>B3 Development and Training</b>	<p>Policies on improving employees' knowledge and skills for discharging duties at work. Description of training activities.</p> <p>Note: Training refers to vocational training. It may include internal and external courses paid by the employer.</p>	EMPLOYEE WELFARE – Training and Development
<b>KPI B3.1</b>	The percentage of employees trained by gender and employee category (e.g. senior management, middle management).	EMPLOYEE WELFARE – Training and Development
<b>KPI B3.2</b>	The average training hours completed per employee by gender and employee category.	EMPLOYEE WELFARE – Training and Development
<b>B4 Labour Standards</b>	<p>Information on:</p> <p>(a) the policies; and</p> <p>(b) compliance with relevant laws and regulations that have a significant impact on the issuer</p> <p>relating to preventing child and forced labour.</p>	EMPLOYEE WELFARE – Human and Labour Rights
<b>KPI B4.1</b>	Description of measures to review employment practices to avoid child and forced labour.	EMPLOYEE WELFARE – Human and Labour Rights
<b>KPI B4.2</b>	Description of steps taken to eliminate such practices when discovered.	Not applicable – no case of child or forced labour was discovered during the Reporting Period
<b>B5 Supply Chain Management</b>	Policies on managing environmental and social risks of the supply chain.	SUSTAINABLE OPERATIONS – Supply Chain Management
<b>KPI B5.1</b>	Number of suppliers by geographical region.	SUSTAINABLE OPERATIONS – Supply Chain Management
<b>KPI B5.2</b>	Description of practices relating to engaging suppliers, number of suppliers where the practices are being implemented, and how they are implemented and monitored.	SUSTAINABLE OPERATIONS – Supply Chain Management
<b>KPI B5.3</b>	Description of practices used to identify environmental and social risks along the supply chain, and how they are implemented and monitored.	SUSTAINABLE OPERATIONS – Supply Chain Management



## HKEx APPENDIX C2 ESG REPORTING GUIDE INDEX *(Continued)*

HKEx ESG Reporting Guide General Disclosures & KPIs		Explanation/Reference Section
<b>KPI B5.4</b>	Description of practices used to promote environmentally preferable products and services when selecting suppliers, and how they are implemented and monitored.	SUSTAINABLE OPERATIONS – Supply Chain Management
<b>B6 Product Responsibility</b>	<p>Information on:</p> <p>(a) the policies; and</p> <p>(b) compliance with relevant laws and regulations that have a significant impact on the issuer</p> <p>relating to health and safety, advertising, labelling and privacy matters relating to products and services provided and methods of redress.</p>	SUSTAINABLE OPERATIONS – Enhancing Customer Satisfaction
<b>KPI B6.1</b>	Percentage of total products sold or shipped subject to recalls for safety and health reasons.	SUSTAINABLE OPERATIONS – Enhancing Customer Satisfaction
<b>KPI B6.2</b>	Number of products and service related complaints received and how they are dealt with.	SUSTAINABLE OPERATIONS – Enhancing Customer Satisfaction
<b>KPI B6.3</b>	Description of practices relating to observing and protecting intellectual property rights.	SUSTAINABLE OPERATIONS – Enhancing Customer Satisfaction
<b>KPI B6.4</b>	Description of quality assurance process and recall procedures.	SUSTAINABLE OPERATIONS – Enhancing Customer Satisfaction
<b>KPI B6.5</b>	Description of consumer data protection and privacy policies, how they are implemented and monitored.	SUSTAINABLE OPERATIONS – Business Ethics
<b>B7 Anti-corruption</b>	<p>Information on:</p> <p>(a) the policies; and</p> <p>(b) compliance with relevant laws and regulations that have a significant impact on the issuer</p> <p>relating to bribery, extortion, fraud and money laundering.</p>	SUSTAINABLE OPERATIONS – Business Ethics
<b>KPI B7.1</b>	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.	SUSTAINABLE OPERATIONS – Business Ethics



## HKEx APPENDIX C2 ESG REPORTING GUIDE INDEX *(Continued)*

HKEx ESG Reporting Guide General Disclosures & KPIs		Explanation/Reference Section
<b>KPI B7.2</b>	Description of preventive measures and whistle-blowing procedures, and how they are implemented and monitored.	SUSTAINABLE OPERATIONS – Business Ethics
<b>KPI B7.3</b>	Description of anti-corruption training provided to directors and staff.	SUSTAINABLE OPERATIONS – Business Ethics
<b>B8 Community Investment</b>	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.	COMMUNITY SUPPORT
<b>KPI B8.1</b>	Focus areas of contribution (e.g. education, environmental concerns, labour needs, health, culture, sport).	COMMUNITY SUPPORT
<b>KPI B8.2</b>	Resources contributed (e.g. money or time) to the focus area.	COMMUNITY SUPPORT





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