

The background of the cover is a deep blue space filled with stars. Overlaid on this are three concentric circles. The top circle is a blue wireframe sphere. The middle circle shows a reddish-orange planet with glowing yellow lines representing landmasses. The bottom circle is a vibrant green forest scene with a bright sunburst effect on the left. A complex network of white and blue lines with circular nodes is scattered across the entire image, resembling a global or digital network.

# OSL

OSL Group Limited  
OSL 集團有限公司

Incorporated in the Cayman Islands with limited liability

(Stock Code: 863)

## 2024 Environmental, Social and Governance Report



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## 1.

**ABOUT  
THIS  
REPORT****Introduction**

OSL Group Limited (previously named BC Technology Group Limited) ("**Company**") and its subsidiaries (hereinafter referred to as "**OSL Group**", the "**Group**", or "**We**"), recognise sustainable business practices as essential for creating enduring societal value. By integrating Environmental, Social, and Governance ("**ESG**") principles into its operations, the Group aims to enhance experiences for all stakeholders. Committed to elevating its ESG performance, the Group upholds high standards of corporate governance, adopts environmentally friendly practices, actively engages with stakeholders, and promotes diversity, fostering a responsible and inclusive business environment.

**Reporting Period**

This ESG Report (the "**Report**") covers the period from 1 January 2024 to 31 December 2024 (the "**Reporting Period**" or "**2024**"), aligning with the Group's financial year.

**Reporting Principles**

Listed on the Main Board of the Stock Exchange of Hong Kong Limited (the "**HKEX**") under the stock code "863", OSL Group Limited has published its ninth ESG Report. Prepared in accordance with the "Environmental, Social and Governance 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 ("**Listing Rules**"), the Report also considers the Global Reporting Initiative (the "**GRI**") Standards, the Task Force on Climate-related Financial Disclosures (the "**TCFD**") Recommendations, and the United Nations Sustainable Development Goals (the "**SDGs**"). This Report marks the fourth consecutive year the Group has issued a comprehensive, long-form ESG Report separately from its Annual Report. For a complete understanding of the Group's ESG performance, it is advisable to read this document alongside the Corporate Governance Report included in the Group's 2024 Annual Report.

The Group adheres to the "comply or explain" provisions and incorporates the four fundamental reporting principles from the HKEX's ESG Reporting Guide.





### Materiality

This Report's content has been defined based on insights gathered from stakeholder engagement and a thorough materiality assessment. To ensure a comprehensive evaluation, the Group engaged an independent external consultant to assist in material analysis. Through this process, ESG matters were pinpointed, assessed and approved by the board (the "**Board**") of directors ("**Directors**").



### Quantitative

The standards and methodologies employed to calculate the relevant data within this Report, along with the underlying assumptions, have been fully disclosed. The Group has established key performance indicators ("**KPI(s)**") that are quantifiable and designed to ensure the comparability under appropriate conditions.



### Balance

The Group's ESG performance is presented under a transparent and unbiased basis, this includes the Group's achievements and areas for improvement.



### Consistency

The Group emphasises maintaining consistent data collection approaches and KPI methodologies annually to ensure comparability across reporting periods.

The information presented in this Report is sourced from official documents, statistics, and operational information provided by the Group and its subsidiaries, all aligned with the Group's internal management frameworks. Comprehensive lists of indicators, prepared in accordance with the ESG Reporting Guide and referencing the GRI Standards, TCFD Recommendations, and SDGs, are included at the end of this Report for further reference.

This Report is published bilingually in both Chinese and English and is accessible on the Group's website at <https://group.osl.com> and on the HKEX website at [www.hkex.com.hk](http://www.hkex.com.hk). Should any discrepancies arise between the Chinese and English versions, the English version will take precedence.

## Reporting Boundaries

This Report encompasses all global operations of the Group where we maintain full managerial oversight throughout the Reporting Period, spanning across regions such as Hong Kong, Mainland China, Singapore, the United Kingdom ("**UK**") and Australia. The Group conducts regular assessments of the Report's scope to guarantee that all substantial influences on its overarching business activities are addressed.

## Review and Approval

The Board recognises its accountability for ensuring the accuracy and completeness of this Report. To the best of their knowledge and belief, the Report addresses all material issues pertinent to the Group's ESG performance during the Reporting Period and provides a fair representation of the Group's ESG achievements. Following a thorough review, the Board has formally endorsed the content of this Report.

## Information and Feedback

The Group is devoted to cultivating a long-term relationship with our stakeholders and is actively engaged in responding to their concerns with timely follow-up actions. If you, as one of our stakeholders, have any questions on the content of the Report or comments on the Group's sustainability practices, please contact us via email at [ir@osl.com](mailto:ir@osl.com).



# ABOUT OSLS GROUP





# 2.

## ABOUT OSL GROUP

OSL Group is Asia's leading public fintech and digital asset company and is the parent company of the OSL digital asset and blockchain platform ("**OSL**"). OSL delivers a suite of market services, encompassing brokerage, exchange, and custody ("**Markets**"), alongside software-as-a-service ("**SaaS**") technology solutions. These offerings provide retail clients, professional investors, corporates, and financial institutions with access to a best-in-class digital asset platform, as well as the world's deepest liquidity pools. Furthermore, its secure and insured hot and cold wallet infrastructure also ensures the safe keeping of digital assets with timely transaction settlements. OSL manages its digital asset platform business from its headquarters in Hong Kong and its offices in Singapore, Australia, and Japan.

As a leader in the digital asset space, OSL Digital Securities Limited ("**OSL DS**"), a wholly owned subsidiary of the Group, has established itself as a pioneer in regulated digital asset services. In December 2020, OSL DS became the first firm to receive a license from the Hong Kong Securities and Futures Commission ("**SFC**") to conduct Type 1 (dealing in securities) and Type 7 (automated trading services (ATS)) regulated activities related to digital assets. As the world's first SFC-licensed, listed, digital asset wallet-insured, and Big Four audited digital asset platform, OSL DS caters to retail clients, professional investors, corporates, and financial institutions, establishing a benchmark for compliance and innovation. Building on this momentum, in July 2022, OSL DS further solidified its leadership by becoming the first SFC-licensed digital asset broker to sell security tokens to professional investors in Hong Kong through a private security token placement. In September 2023, the Group achieved SOC 2 Type 2 certification on its Custody and Automated Trading Service ("**ATS**") offerings. In April 2024, OSL DS became the first digital asset platform to obtain a license under the Anti-Money laundering and Counter-Terrorist Financing Ordinance ("**AMLO**") in Hong Kong, reinforcing its position as a trusted and secure partner in the digital asset ecosystem.

The Group completed the disposal process of its business park management division in 2024, which was formerly responsible for the operations and management services for commercial property in the Jingwei Park in Shanghai.

To learn more about OSL Group, please refer to the Group's 2024 Annual Report or visit <https://group.osl.com>.



## 3.

**CHIEF EXECUTIVE  
OFFICER'S  
STATEMENT**

Upholding exceptional management principles and a shared vision, I begin my tenure as the leader of OSL Group with great honour and a deep sense of responsibility. As a member of the Group, I feel profoundly privileged while also being acutely aware of the weighty responsibility entrusted to me – to guide our team towards excellence. During this critical period, we will continue to uphold ESG principles with unyielding determination, embedding them into the very core of our organisational strategy.

This year, OSL Group has successfully completed the acquisition of a licensed digital asset service provider, CoinBest K.K. (CoinBest), and officially renamed it to OSL Japan Limited. This transaction marks a significant milestone in the Group's global expansion. We will integrate regional resources and offer customised services, allowing us to establish robust networks globally that offer seamless, secure, compliant, and professional digital asset services to a diverse global client base.





The global economy demonstrated a resilient recovery momentum in a complex environment where multiple risks overlapped. However, we must confront the increasingly severe challenges posed by climate change. We are well aware that ESG is not only a crucial tool for addressing climate-related risks but also a key driver for businesses to achieve high-quality development and create long-term value. We are committed to achieving net-zero by 2050 through a comprehensive climate risk assessment framework that identifies both physical and transitional climate-related risks relevant to the Group, informing the development of our robust sustainability strategy.

In furtherance of our ESG commitment, we extend our dedication beyond environmental stewardship to encompass the well-being of our employees and the communities we serve. The Group is steadfast in fostering an inclusive workplace that prioritises the health, safety, and security of all employees, thereby cultivating an environment conducive to innovation and collaboration. Our commitment to social responsibility is exemplified through initiatives such as proudly sponsoring the 2024 Hong Kong Securities and Investment Institute Case Competition. This partnership enables us to engage with students in exploring and advancing ESG practices across various industries, demonstrating our commitment to nurturing the next generation of professionals in building a sustainable future.

Excellence in governance is the cornerstone of our sustainable development. The Board of Directors plays a pivotal role in overseeing matters related to sustainability, ensuring that our strategies align with long-term environmental and social goals. By fostering a culture of transparency and accountability, we continuously strengthening our ability to integrate sustainable practices into every aspect of our operations. These initiatives not only drive our commitment to sustainability but also facilitate effective communication and implementation processes. This structured approach to governance ensures that we consistently work towards a future where business success is harmoniously balanced with societal and environmental well-being.

As we continue to expand our business footprint, the Group has consistently adhered to the core principle of ESG in our daily operational management and long-term strategic planning. At this significant moment, I would like to extend my most sincere gratitude to our clients, partners, investors, Board of Directors and staff who have consistently supported us. Our past achievements have been made possible by the trust and confidence of our stakeholders.

Looking forward, we will continue to deepen our strategic collaboration with all stakeholders to collectively drive industry progress and social advancement. We remain committed to achieving a harmonious balance between economic, social, and ecological benefits, contributing to the creation of a better world.

Sincerely,

**Cui Song**  
*Executive Director and Chief Executive Officer*  
**OSL Group Limited**



# APPROACH





# 4.

## ■ APPROACH

### ■ Board Statement

As a leading digital asset company in Hong Kong, we recognise the paramount importance of integrating ESG considerations into our business strategy and operations. The Board maintains ultimate oversight of the Group's ESG initiatives and is committed to fostering sustainable development whilst creating long-term value for our stakeholders.

Through our established management approach, we evaluate and manage ESG-related risks and opportunities, particularly those unique to the digital asset sector. The Board regularly reviews and guides the Group's ESG strategy, ensuring alignment with our business objectives and stakeholder expectations. Our approach encompasses careful consideration of environmental impact, particularly regarding energy consumption in digital operations, social responsibility in financial inclusion, and maintaining the highest standards of corporate governance.

The Board, supported by the Executive Committee, regularly assesses material ESG issues through a comprehensive evaluation process. This includes monitoring emerging trends in sustainable finance, technological advancement, and regulatory developments in the digital asset sphere. We prioritise these matters based on their potential impact on our business operations and stakeholder interests.

To ensure effective implementation of our ESG initiatives, the Board conducts periodic reviews of progress against established targets and objectives. These reviews enable us to adjust our approach as needed and maintain accountability in our sustainability journey. We remain steadfast in our commitment to responsible business practices and sustainable growth in the evolving digital asset landscape.

### ■ ESG Governance

Our ESG management approach aims to facilitate effective oversight and implementation of sustainability initiatives across our operations.

The Board oversees the Group's overall ESG strategy and performance, with responsibilities encompassing policy approval, strategic planning, and ensuring the integration of sustainability considerations into our business operations. This includes monitoring risk management processes, particularly those pertaining to the unique challenges and opportunities within the digital asset sector.

Supporting the Board, the Executive Committee plays a crucial role in implementing ESG initiatives at the management level. This committee facilitates regular communication between the Board and operational teams, ensuring effective execution of ESG strategies and timely reporting of progress.

Our management approach includes periodic assessment and review activities to evaluate the effectiveness of ESG initiatives and ensure alignment with corporate objectives. We maintain a flexible approach, allowing us to respond effectively to evolving ESG challenges and opportunities in the digital asset industry.

## ■ ESG Strategy

OSL Group stands out as one of the most highly regulatory-compliant and institutionally prepared digital asset entities worldwide. It is steadfastly pursuing its vision to lead the regulated advancement of the digital asset market for institutions. This vision closely aligns with the responsibility to lead the Group's ESG impact across the blockchain and digital asset sectors.

The Group is committed to creating long-term sustainable value for its stakeholders. While conducting its business, senior management makes decisions that have a positive impact on the community. Comprehensive policies have been implemented to address ESG aspects relevant to its operations, covering areas such as employment and labour practices, business ethics, data protection, privacy, Anti-Money Laundering ("**AML**"), Counter-Terrorist Financing ("**CTF**"), anti-corruption efforts, market surveillance, and transaction monitoring. Furthermore, the Group is engaged in promoting sustainable environmental practices and employing eco-conscious operational procedures.

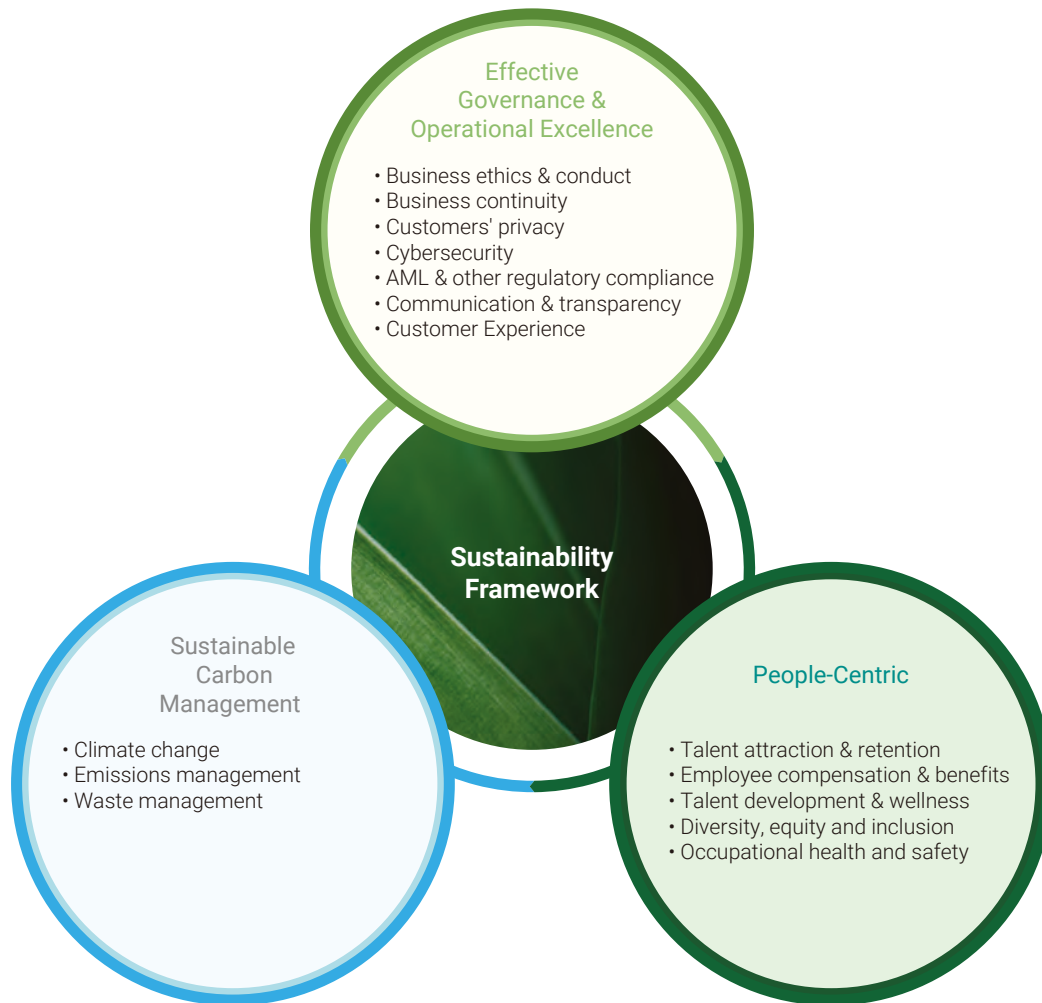
The creation and delivery of sustainable benefits to stakeholders remains a core value to the Group's philosophy. Ensuring the effective and consistent execution of our long-term vision and mission across the organisation necessitates a structured approach. Our sustainability framework, which consists of three strategic pillars, has been developed to support this commitment:

- (1) Sustainable Carbon Management;
- (2) People Centric; and
- (3) Effective Governance & Operational Excellence.

The contents of this Report were developed around these three pillars and each section focuses on one pillar of the framework.



## Sustainability Framework



## United Nations' Sustainable Development Goals

The Group supports the United Nations' Sustainable Development Goals ("SDGs"), which focus on addressing climate change and various social challenges. As a responsible corporate entity, we recognise the importance of the global trends outlined in the SDGs and are committed to contributing to and tackling sustainability challenges. Our ESG strategy is aligned with the SDGs as follows:

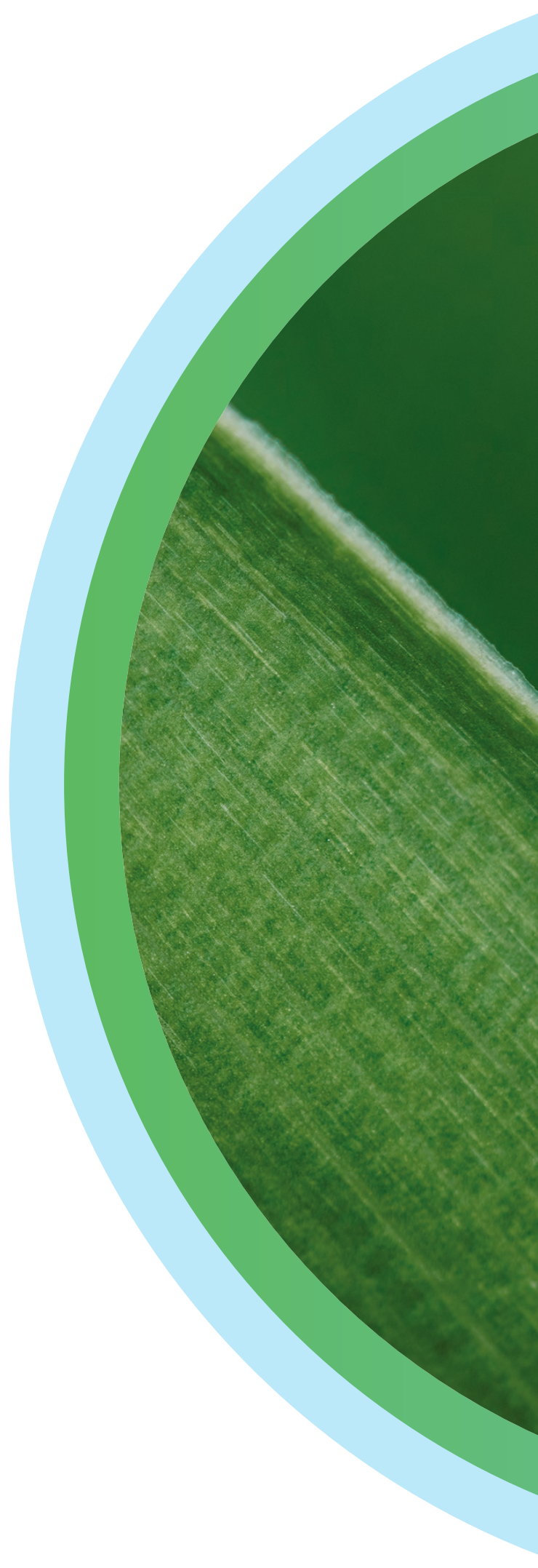


## ■ Stakeholders Engagement

The Group endorses the perspectives and expectations of its stakeholders, which are crucial for achieving both the Group's objectives and its sustainability goals. To ensure alignment with these insights, the Group actively interacts and communicates with key stakeholders, including shareholders, employees, business partners, customers, and regulators. These interactions allow the OSL Group to identify and address their concerns and needs effectively.

Ongoing stakeholder engagement is integral to the Group's ESG governance and management processes. Regular dialogue with stakeholders helps the Group gain a deeper understanding of their expectations and concerns. This continuous interaction allows the Group – an SFC-licensed brokerage and exchange, as well as an employer and corporate citizen – to address opportunities and challenges effectively while fostering long-term loyalty and trust. The Group's consistent engagement with stakeholders contributes to community development, which in turn supports sustainable growth.

During the Reporting Period, the Group maintained its engagement with key stakeholders through various communication channels, such as meetings and surveys. The feedback collected was reviewed by senior management, who assessed the relevance of material ESG topics to key stakeholder groups.





## Stakeholder communication matrix




Employee	<ul style="list-style-type: none"> <li>• Employees' compensation and benefits</li> <li>• External and internal training and development opportunities</li> <li>• Occupational health and safety</li> </ul>	<ul style="list-style-type: none"> <li>• Employee engagement surveys</li> <li>• Staff training and workshops</li> <li>• Town-hall meetings and "Ask Management Anything" sessions</li> <li>• Staff performance appraisals</li> </ul>
Shareholders and potential investors	<ul style="list-style-type: none"> <li>• Return on investment</li> <li>• Corporate governance</li> <li>• Strategic plans</li> </ul>	<ul style="list-style-type: none"> <li>• Annual general meeting</li> <li>• Corporate communications</li> <li>• Interim and annual reports</li> <li>• Announcements and press releases</li> <li>• Investor conference calls and virtual meetings</li> <li>• Engagement surveys</li> <li>• Monthly investor newsletters</li> <li>• Results briefings</li> </ul>
Customers and potential customers	<ul style="list-style-type: none"> <li>• Service quality assurance</li> <li>• Customers' privacy and confidentiality</li> <li>• Cybersecurity</li> </ul>	<ul style="list-style-type: none"> <li>• Communications with sales representatives and traders</li> <li>• Customer support channels</li> <li>• Corporate website</li> <li>• Daily communications</li> <li>• Social media posts</li> <li>• Press releases</li> <li>• EDMs</li> </ul>
Suppliers and vendors	<ul style="list-style-type: none"> <li>• Fair and open procurement</li> <li>• Win-win cooperation</li> </ul>	<ul style="list-style-type: none"> <li>• Visits and meetings</li> <li>• Due diligence procedures</li> <li>• Regular supplier reviews</li> <li>• Engagement surveys</li> </ul>
Government and regulators	<ul style="list-style-type: none"> <li>• Compliance with rules and regulations</li> <li>• Anti-corruption policies</li> <li>• Contribution to the local economy</li> </ul>	<ul style="list-style-type: none"> <li>• Daily communications</li> <li>• Compliance with local rules and regulations</li> <li>• Circulars and guidelines of regulatory authorities</li> <li>• Regular dialogues and meetings</li> </ul>



## Materiality Assessment

Guided by the principle of materiality, we conduct stakeholder-driven assessment regularly to identify key ESG issues. The process allows us to optimise resource allocation, effectively address these matters, and mitigate associated risks.

The Group conducted a comprehensive three-step materiality assessment in prior reporting period:

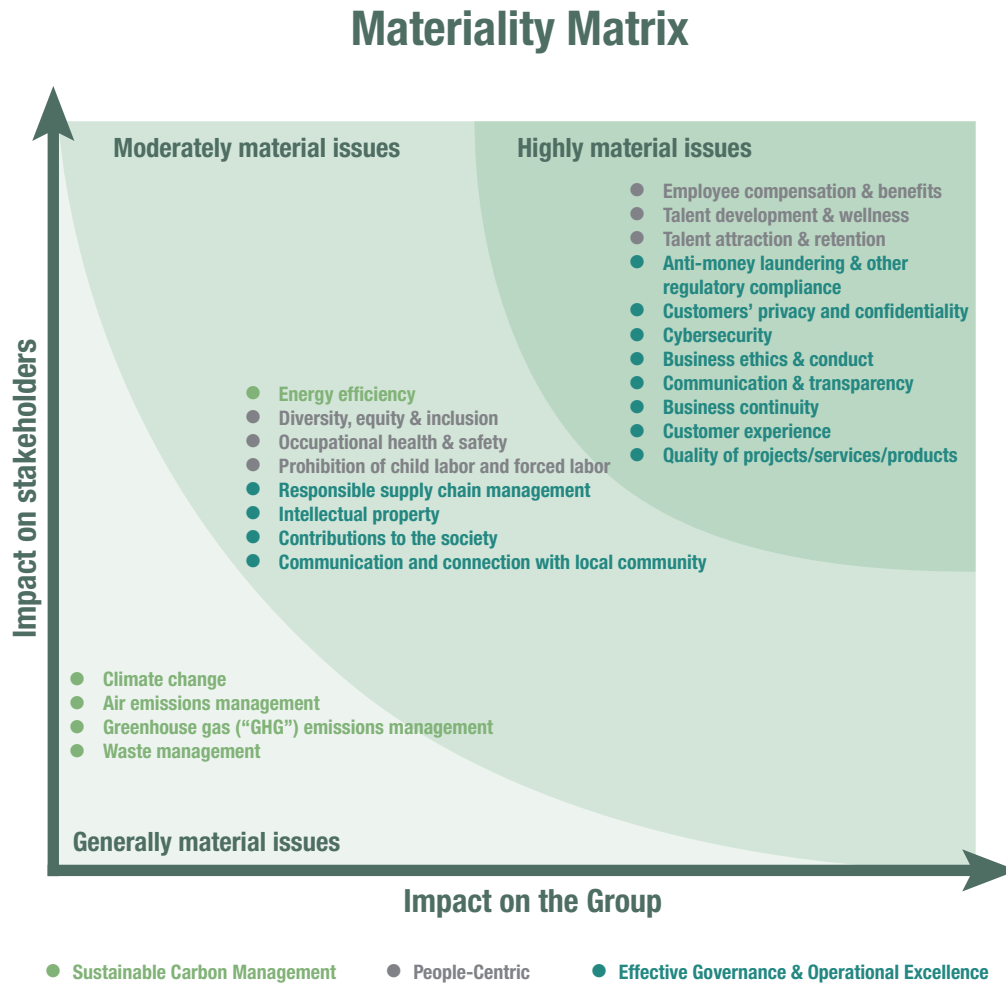
 <b>1. Identify Relevant Topics</b>	<ul style="list-style-type: none"> <li>• Research of relevant economic, environmental and major social trends and challenges</li> <li>• Review of available internal documents and peer companies, creation and curation of a list of relevant ESG topics</li> <li>• 25 issues were identified and categorised by the Group's sustainability framework pillars</li> </ul>
 <b>2. Assess and Rank</b>	<ul style="list-style-type: none"> <li>• A materiality matrix was created based on the results of internal and external assessments:</li> <li>• Internal assessment: The material issues were assessed based on the Group's corporate values, development strategy, upcoming market challenges and opportunities</li> <li>• External assessment: In addition to communicating with stakeholders through regular channels, the Group engaged an independent third-party consultant to conduct an online survey of key stakeholders to understand their expectations</li> <li>• The impacts of the issues were ranked on a scale of 1 to 5, with 1 being least impact and 5 with most impact to the Group or the stakeholders</li> </ul>
 <b>3. Validate Results</b>	<ul style="list-style-type: none"> <li>• The analysis and recommendations of material issues was presented to the Board</li> <li>• The Board reviewed and approved the final list of material issues and provides strategic guidance for addressing these issues</li> </ul>

In 2024, we reviewed the previous year's materiality assessment results, analysed market trends, and engaged with key stakeholders through regular dialogues. Following careful consideration, we removed "Environmental regulatory compliance" and "Environmental friendliness of products or services purchased", as they were deemed less material to our business. There are 23 issues remained unchanged from the 2023 assessment. The outcomes were discussed and validated by both senior management and the Board.



## Materiality Matrix

The feedback gathered from the internal and external assessments was reviewed and analysed. The results of the materiality assessment are shown below:





# SUSTAINABLE CARBON MANAGEMENT



# 5.

## SUSTAINABLE CARBON MANAGEMENT

### Strategic approach:

- Pledge to support carbon neutrality initiatives with the goal of achieving net-zero emissions in the future
- Drive the advancement of decarbonisation and green innovation within the digital asset industry
- Minimize the carbon footprint generated by the Group's operations
- Enhance digitalization and automation efforts to reduce resource consumption and the necessity for business travel



## ■ Responding to Climate Change

In the face of an increasingly severe global climate crisis, businesses and investors are progressively recognising the significance of sustainability and environmental stewardship. As a leading digital asset and fintech company, we acknowledge that addressing climate change is not only an environmental imperative but also a critical factor in building business resilience and driving long-term value creation. We are dedicated to achieving net-zero by 2050 through measures aimed at reducing operational emissions and improving energy efficiency.

Please refer to the section “Emissions Management and Reducing Carbon Footprint”.

## ■ Climate resilience

To address climate change effectively, we have adopted a multi-faceted approach. Initially, we implemented carbon credit offset measures, purchasing 2,000 tonnes of voluntary carbon credits from AirCarbon Exchange (ACX) in 2021. These credits were issued under Verra’s Verified Carbon Standard (“VCS”) Programme, originated from a solar renewable power project in India, enabling us to achieve a “carbon negative status” in our development journey.

The Group has also invested in Allinfra, a blockchain firm specialising in tokenising infrastructure and renewable energy projects. Their efforts in Asia to tokenise renewable energy data for emission and carbon reduction credits align with our commitment to innovative climate solutions.

As we progress with dedication in sustainable development, we joined the Crypto Climate Accord (“CCA”) as an official supporter. Inspired by the Paris Agreement, the CCA aims to decarbonise the global crypto industry by 2040, emphasising climate stewardship and transitioning to net-zero greenhouse gas (“GHG”) emissions. Our involvement extends beyond endorsement; we actively contribute to advising, developing, and scaling solutions that support the CCA’s objectives.

Through these strategic actions, we aim to significantly reduce greenhouse gas emissions and promote environmental conservation, thereby making a positive impact on the environment and effectively addressing the challenges posed by climate change.

## ■ Climate-related risks and opportunities

The Group recognises that climate change is a critical challenge demanding urgent action. Our primary focus is to effectively manage climate-related risks that may impact our employees, facilities, and overall business operations, while upholding our commitment to sustainable business practices. To deepen our understanding of how climate change could affect our operations, we have conducted comprehensive analyses, including climate scenario analysis and climate-related risk assessments, all of which are performed in accordance with the Task Force on Climate-related Financial Disclosures (“TCFD”) framework.



For climate-related risks assessment, we have selected six suitable scenarios from the Representative Concentration Pathways (“**RCP(s)**”) and Shared Socio-Economic Pathways (“**SSP(s)**”) of the Intergovernmental Panel on Climate Change (“**IPCC**”), the Global Energy and Climate Model from the International Energy Agency (“**IEA**”). The details of the scenarios used are stated as follows:

Aggressive mitigation scenarios	Business-as-usual scenarios
<b>IPCC RCP 2.6</b> A stringent mitigation scenario which is in line with the Paris Agreement’s target (i.e. warming of less than 2°C by 2100).	<b>IPCC RCP 8.5</b> A high GHG emission scenario which is consistent with a future with no policy changes to reduce emissions (i.e. warming in excess of 4°C by 2100).
<b>IPCC SSP1 – Sustainability</b> A scenario of the world shifting gradually towards a sustainable path.	<b>IPCC SSP5 – Fossil-fuelled development</b> A scenario that the world places increasing faith in competitive markets and is coupled with the exploitation of abundant fossil fuel resources.
<b>IEA Net Zero Emission by 2050 Scenario</b> A scenario which sets out a pathway for the global energy sector to achieve net-zero CO <sub>2</sub> emissions by 2050.	<b>IEA Stated Policies Scenario</b> A scenario which reflects current policy settings based on a sector-by-sector and country-by-country assessment of the specific policies that are in place.

We have identified both physical and transition risks within the context of business-as-usual scenarios based on our location of operation. Physical risks encompass potential disruptions caused by extreme weather events and changing climatic conditions, which could directly impact our operational efficiency and infrastructure. Transition risks, on the other hand, refer to challenges associated with regulatory shifts, market dynamics, and evolving stakeholder expectations. All of which require proactive strategies to address the implications of climate change effectively.

Although the Group is exposed to low levels of physical risks, however, several factors still pose concerns. The details of acute and chronic physical risks and transition risks assessment are as follows:

### Physical risks

Risk Types	Description	Potential Impact	Management and mitigation measures
Acute	<ul style="list-style-type: none"> <li>The increasing intensity of extreme weather events, such as cyclones, heavy rainfall, and flooding, poses significant challenges to our operational continuity and infrastructure resilience.</li> </ul>	<ul style="list-style-type: none"> <li>The increasing frequency of extreme weather events, such as tropical cyclones, on a global scale, will likely lead to higher insurance premiums in the medium and long terms.</li> <li>Potential loss of revenue resulting from business interruptions.</li> <li>Safety risks posed to our employees.</li> </ul>	<ul style="list-style-type: none"> <li>The Group utilises a distributed network of remote data centres and has established robust business continuity and disaster recovery plans to ensure resilience against physical disasters.</li> <li>In addition, the Group undertakes regular reviews of business continuity plans to ensure the adequacy of contingency policies designed to protect our employees during such events.</li> </ul>
Chronic	<ul style="list-style-type: none"> <li>Chronic risk refers to ongoing, persistent threats or vulnerabilities that evolve gradually over time and can have long-lasting impacts, such as heat stress.</li> </ul>	<ul style="list-style-type: none"> <li>Heat stress-related illnesses are causing reduced productivity and an increase in lost working days. Employees in Australia and the Americas are particularly affected, facing a significant rise in the number of extremely hot days (with maximum temperatures exceeding 35°C). This trend is expected to lead to long-term revenue declines.</li> </ul>	



### Transition risks

Risk Types	Description	Potential Impact	Management and mitigation measures
Policy & legal	<ul style="list-style-type: none"> <li>Increased regulatory scrutiny and reporting requirements</li> <li>Implementation of carbon pricing mechanisms and carbon tax</li> </ul>	<ul style="list-style-type: none"> <li>The introduction of carbon pricing mechanisms or carbon taxes, along with enhanced sustainability reporting requirements, may lead to increased compliance costs and elevated legal risks associated with non-compliance of new regulations.</li> <li>It is crucial to closely monitor the development of government policies and provide additional training to staff on new regulations to ensure full compliance.</li> </ul>	<ul style="list-style-type: none"> <li>The Group is closely monitoring the development of government policies and provide additional training on new regulations to staff to ensure organisational compliance.</li> </ul>
Market	<ul style="list-style-type: none"> <li>Changing customer preferences</li> </ul>	<ul style="list-style-type: none"> <li>Changes in customer preferences present both opportunities and challenges, requiring agile responses to maintain market position.</li> </ul>	<ul style="list-style-type: none"> <li>We have established and enhanced energy conservation, waste management, and carbon reduction management systems.</li> <li>Actively promote the utilisation of renewable energy sources, including initiatives to encourage employees to use electric vehicles for transportation.</li> </ul>
Reputation			<ul style="list-style-type: none"> <li>We have engaged in carbon credit offset programmes and invested in climate mitigation projects to support efforts that reduce greenhouse gas emissions and promote environmental conservation.</li> </ul>
Climate-related Opportunities		Potential Impacts	
<ul style="list-style-type: none"> <li>Incorporate green digital assets, such as green tokens, into the Group's blockchain platform.</li> <li>Transition into a renewable energy based business.</li> </ul>		<ul style="list-style-type: none"> <li>Satisfy potential changes in customer needs.</li> <li>Maintain a good reputation and become a pioneer in the industry.</li> <li>Maintain our competitiveness in the market.</li> </ul>	

## ■ Emissions Management and Reducing Carbon Footprint

The Group is committed to upholding long-term environmental sustainability and advancing community development. It ensures full compliance with all relevant environmental laws, regulations, and standards in the regions where it operates.

### ■ Air emissions

Air pollution is one of the most significant environmental risks to our health. The Group recognises the importance of reducing air pollution and has identified the main source of emissions from its operations. Due to the nature of its service-based business and the lack of industrial production, the Group does not directly generate significant exhaust fumes during its operations. As a result, air emission levels remained consistently low. Given the minimal impact of air emissions, they were considered immaterial to the Group's overall operations.

### ■ Measures to reduce air emissions

To mitigate our impact in terms of air emissions, we have several strategies implemented:

- Optimise journey planning to reduce transportation mileage and utilise vehicles with lower emissions.
- Minimise the number of trips made for business travel.
- Promote the use of video and web conferencing as alternatives to face-to-face meetings.

## ■ GHG emissions

Global climate change poses a significant challenge that businesses and organisations worldwide must proactively address.

An analysis of the 2024 GHG emissions reveals that the Group did not involve any significant amount of emissions from scope 1. In comparison, scope 2 emissions, which are derived from purchased electricity, represent the largest share of the organization's GHG emissions at 59%. Additionally, Scope 3 emissions, primarily attributable to air travel and other indirect sources, contribute 41% to the total emissions. Notably, the Reporting Period saw a 63% decrease in the overall GHG emissions compared to the previous year, which was mainly due to the Group's reduction in vehicle-related fuel consumption and electricity consumption.

As the Group is committed to achieve net-zero emissions by 2050, we are closely monitoring emission reduction targets. To achieve these targets, the Group is committed to continuously reducing energy consumption and promoting greater energy conservation awareness among employees through the implementation of various carbon reduction strategies and measures. These include:

- **Implementation of energy-efficient office equipment and lighting solutions:** such as LED lights and high-efficiency chillers.
- **Installation of motion sensors:** to automatically turn off office lighting when areas are unoccupied.
- **Maximise natural light usage:** wherever feasible, without disrupting workplace productivity.
- **Ensure swift replacement of faulty lighting fixtures:** to prevent unnecessary power consumption.



- **Installation of automative controlling system:** to automatically turn off air conditioning in core offices by 7:00 pm.
- **Reduction of unnecessary travel:** when applicable, utilise video and web conferencing technologies effectively to avoid emissions associated with business travel.
- **Transition to an efficient paperless system:** reduce unnecessary paper consumption.
- **Flexible working arrangements:** reduce energy consumption by minimising fuel consumption, as well as decreasing the production of office waste.

As we progress, the Group remains committed to a sustainable future and will continue to evaluate, document, and transparently report our GHG emissions on an annual basis. This ongoing effort is in strict alignment with our net-zero strategy, which underscores our dedication to environmental stewardship and the reduction of our carbon footprint.

## ■ Waste Management

Recognising the importance of waste reduction and management, the Group remains steadfast in its commitment to uphold the principles of “reduce, reuse, and recycle” across all operational activities. Through the implementation of these principles, the Group seeks to minimise the volume of waste generated and actively support a circular economy framework.

In addition to these overarching commitments, the Group is devoted to rolling out a variety of waste management practices within its office-based operations. These measures are designed to curtail waste production, bolster recycling rates, and ensure accurate segregation of waste materials at their origin.

Among the initiatives being pursued are:

### ■ Waste reduction

The Group is actively driving waste reduction and encourages employees to minimise waste generation in their daily activities. Key measures include transitioning to digital documentation to reduce printing, procuring sustainably sourced office paper and restricting printing to essential tasks, setting default printer configurations to double-sided and monochrome modes, implementing centralised procurement of paper products, enforcing strict controls on usage quantities, reusing single-sided printed materials and stationery, and promoting cautious and responsible resource management.

### ■ Waste separation

The Group highlights the critical role of waste separation at the source to enhance recycling efficiency. By ensuring proper segregation of waste types, such as hazardous and non-hazardous materials, the Group facilitates effective recycling or disposal processes.

### ■ Recycling programmes

Within its offices, the Group has established recycling programmes for the efficient diversion of reusable materials from the waste stream. This initiative includes the provision of clearly labelled recycling bins for paper, plastic, and aluminium, as well as ongoing employee education regarding the appropriate sorting and disposal of recyclable items.

### ■ Paperless practices

In recognition of the environmental impact associated with paper usage, the Group has implemented various technological measures to reduce paper consumption. These include the introduction of digital document management systems, the promotion of electronic communication and collaboration, and the implementation of paperless workflows across departments.



### Employee awareness

The Group has initiated educational campaigns to inform employees about best practices in waste management. These efforts have contributed to establishing a workplace culture that prioritises waste reduction and recycling, ensuring that all team members are aware of the company's waste management policies and actively participate in their implementation. By executing these waste management strategies, the organisation aims to significantly reduce waste output, enhance recycling efficiency, and foster a more sustainable office setting. Such initiatives underscore the company's commitment to environmental stewardship and play a crucial role in fulfilling its broader objectives of minimising ecological footprint.

### Use of Resources

The Group is committed to maximising resource efficiency and transitioning towards a low-carbon business model through sustainable practices and the implementation of energy-efficient technologies, with the aim of reducing its carbon footprint and achieving long-term environmental goals.

### Energy consumption

During the Reporting Period, OSL Group has indirect energy consumption arose from the purchase of electricity, which constitutes the primary energy consumption sources within the Group's operations. The total energy consumption experienced a significant decrease of approximately 66% compared to the previous year, primarily driven by the reduction in gross floor area of the Group's Hong Kong and Mainland China offices which resulted in lower purchased electricity consumption. As part of ongoing improvement initiatives, the Group remains committed to enhancing energy efficiency. Further details on measures taken to reduce energy consumption can be found in the "Emissions Management and Reducing Carbon Footprint" section.



## ■ Water consumption

The Group's water supply is primarily sourced from municipal authorities, and we have encountered no difficulties with our water practices. The Group operates in an office environment where water supply is centrally managed and controlled by the property management department. As a result of this centralised system, individual offices do not have separate water meters to measure usage, and there have been no issues with the water supply. Despite the objective obstacle of measuring water consumption data, the Group remains committed to efficient water conservation. Employees are consistently reminded to turn off taps after use, promoting responsible water usage throughout the organisation. Regular inspections of taps are conducted to identify and address potential leaks promptly, thereby preventing unnecessary waste of water resources. These proactive steps demonstrate the Group's efforts toward water resource protection and sustainable resource management. However, water consumption itself is not assessed as material to the Group.

## ■ The Environmental and Natural Resources

The Group recognises its responsibility in mitigation and adaptation of climate change by prioritising sustainable practices and preservation of natural resources by conducting responsible resource management. Environmental principles are embedded within both Group's internal management processes and daily operations. To mitigate the environmental impact of its activities, the Group is committed to implementing industry best practices, complying with public legal requirements, establishing and reviewing environmental objectives, and utilising materials and energy efficiently to reduce waste and emissions. Environmental policies are communicated to all employees to ensure alignment with OSL Group's commitments.

The inherent nature of the Group's operations does not generate significant environmental impact on natural resources. During the Reporting Period, there were no instances of non-compliance with environmental laws or regulations that had a material impact on the Group.





# PEOPLE-CENTRIC





# 6.

## PEOPLE-CENTRIC

### Strategic approach:

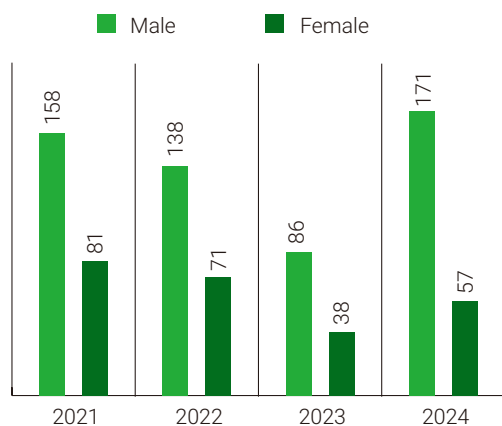
- Foster a high-performing culture that drives excellence
- Create a supportive working environment that promotes workplace diversity, wellbeing, health, and safety, advanced innovation and inclusion
- Implement accountable and fair procedures for employment, career advancement, and reward schemes, which contribute to sustainable business outcomes
- Provide a comprehensive learning and development programme that facilitates personal and professional growth, enabling individuals to build meaningful careers within OSL Group



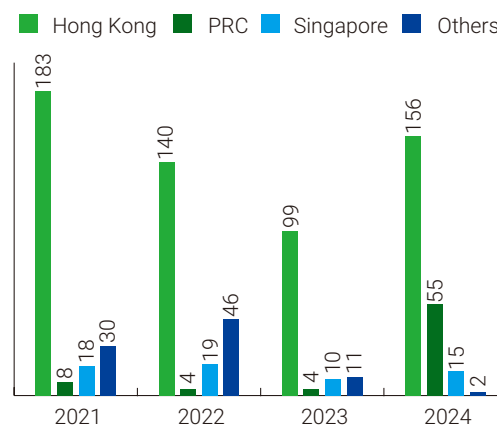


## Employment and Training Statistics

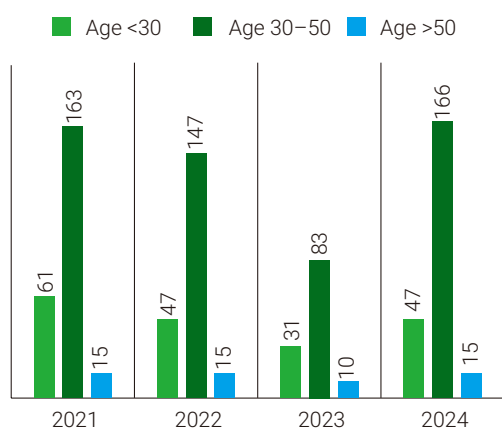
### Total number of employees by gender



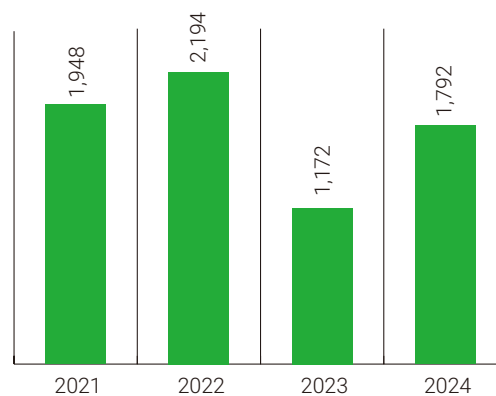
### Total number of employees by geographical region



### Total number of employees by age group



### Total number of training hours



The Group is committed to enhancing employee well-being, health, and professional development. We believe that robust human resources policies are fundamental to implementing the philosophies of our “people-centric” culture. A set of human resources policies is designed to ensure equal opportunities and fair treatment in areas such as recruitment, training, performance assessment, promotions, remuneration, and benefits. In circumstances of employee terminations, the process is conducted in accordance with local laws and the stipulations outlined in employment contracts. The Group strictly adheres to all relevant labour laws and regulations where we operate. During the Reporting Period, the Group was not aware of any material non-compliance of employment-related laws and regulations in relation to compensation and dismissal, recruitment and promotion, working hours, rest periods, equal opportunity, diversity, anti-discrimination, other benefits and welfare.

OSL Group established a Code of Conduct to foster a professional working environment with integration of ethics and responsibility. This code sets forth clear behavioural and professional expectations for all employees, serving as a guide to support the Group’s commitment to ethics and professionalism. Furthermore, the Group is dedicated to attracting and retaining top talent by offering competitive compensation packages which are linked to individual performance and role requirements. Regular and comprehensive performance evaluations are conducted to accurately assess employee contributions and provide constructive feedback, along with specific development opportunities to enhance professional growth.

### ■ Building Diversified Teams, Hiring and Retaining the Right People

Valuing talent is integral to our success, driven by our people-centric approach to human resources management. We are committed to building diversified teams with exceptional skills and potential. With clear recruitment standards and competitive remuneration packages, we ensure fairness and attractiveness in our employment offerings. We proactively monitor employee turnover against industry benchmarks to maintain competitive practices. Our work environment prioritises employee well-being and career development, aiming to support and engage our workforce effectively. Through exit surveys and staff interviews, we gain valuable insights into employee experiences and motivations for leaving, enabling us to refine our workplace culture continually. These efforts contribute to enhanced employee satisfaction and loyalty, ultimately reducing turnover and ensuring the retention of our valued talent.

The Group champions diversity, boasting a multicultural team in terms of gender, nationality, and professional expertise. This blend of perspectives and skills fosters innovation and enhances the organisation’s competitiveness, playing a crucial role in expanding its market reach and customer base while elevating its corporate reputation and driving long-term growth.

## ■ Learning and Development

We place a strong emphasis on continuous learning and development, recognising its significance in employee growth and our competitive position. We strive to create a dynamic learning environment that encourages ongoing education, allowing employees to expand their skill sets, realise their full potential and capitalise on new opportunities. To facilitate a seamless onboarding experience for new hires, we offer a comprehensive induction programme, which covers our organisational structure, an overview of various departments, the Employee's Code of Conduct, and an overview of essential policies and procedures. By aligning new employees with our cultural values, we aim to enhance their job satisfaction and sense of belonging, which in turn boosts their productivity and overall contribution to the team.

Furthermore, we are committed to upholding the ethical standards and preventing any form of misconduct. Employees attend annual training on business ethics, fraud prevention, anti-bribery, AML, counter-terrorism financing, insider trading, information security and cyber risk, and conflicts of interest. We also regularly provide "Learning & Development" workshops and online learning modules to keep employees informed about the latest industry trends, and equip them with vital skills. In addition, we sponsored training for all relevant staff engaging in type 1 and 7 regulated activities to enhance their technical expertise and regulatory compliance. Moreover, we are exploring opportunities to offer financial support to employees pursuing professional certifications or qualifications, further demonstrating our commitment to their continuous development and growth.

During the Reporting Period, the total number of training hours of Group staff was 1,792, with a 86% employee coverage rate.

## ■ 'Speak-Up' Culture

OSL Group recognises that open and transparent communication is a cornerstone of our vibrant and inclusive corporate culture. We encourage employees to act with integrity, expressing their views candidly and confidently, particularly when facing challenging situations. Facilitating dialogue between staff and senior management is crucial; we achieve this through regular town hall meetings and "Ask Management Anything" sessions. These forums enable open conversations, allowing us to gain insight into employee perspectives and needs, strengthen communication, and foster mutual understanding and respect. Such interactions also serve as platforms for idea-sharing and innovation, helping to build positive relationships among colleagues.

Additionally, we utilise internal communication tools to gather immediate feedback through surveys, allowing employees to freely share their experiences and valuable insights. This feedback allows the HR department and management to develop our "people-centric" HR initiatives and various well-being programmes that meet the dynamic needs of the workforce.




## Well-Established Performance Management

OSL Group is committed to maintaining transparent and fair human resource processes, ensuring equity in recruitment, compensation, promotions, and terminations. Central to this commitment is a comprehensive 360-degree performance assessment system, which facilitates regular feedback meetings between managers and employees. The frequency of the performance review is at least once per year, providing a structured channel for discussing progress, offering constructive feedback, and setting clear objectives. Utilising a cloud-based objective management system, the HR team provides employees with defined goals and guidance, fostering alignment with company objectives.

OSL Group offers competitive remuneration to attract top talent, taking into account individual performance, behavioural standards, and market benchmarks. A significant portion of this compensation is performance-based, incorporating variable elements linked to both individual's and the Group performance. Additionally, the Group offers Share Option Scheme and Stock Award Plan, enabling employees to align their interests directly with the OSL Group's achievements, thereby building a culture of shared achievement and motivation.

## Promoting Diversity, Equity and Inclusion

In line with its commitment to fostering an inclusive and equitable work environment, OSL Group has established the equal opportunities policy that reflects its dedication to valuing and respecting all employees. The policy, outlined in the employee handbook, emphasises a zero-tolerance approach to discrimination or harassment, ensuring transparency and clarity in conveying the Group's principles of inclusivity. By promoting equal opportunities, the Group ensures that all employees are aware of their rights and responsibilities, collectively striving to maintain a fair and respectful workplace. Furthermore, OSL Group provides secure and confidential channels for reporting incidents, treating all claims of harassment or discrimination with the utmost seriousness through thorough investigations and appropriate actions. The use of gender-inclusive language within the workplace further enhances the Group's commitment to creating an environment of respect and understanding.



The Group strictly adheres to all applicable local laws, regulations, and ordinances, reinforcing its role as an equal opportunity employer. This commitment extends to ensuring that all employees and job applicants are treated fairly, regardless of race, colour, religion, nationality, gender, age, marital status, sexual orientation, disability, political affiliation, physical appearance, family responsibilities, pregnancy, or any other characteristic protected by law. Employment decisions are based solely on merit, qualifications, and suitability for roles. Additionally, OSL Group conducts its operations in respect of internationally recognised human rights, aligning with the United Nations Guiding Principles on Business and Human Rights, International Bill of Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work. The Group prohibits the use of child labour and forced labour across all its units and supply chains, ensuring that no employee is subjected to coerced or punitive working conditions. Our Human Resources department verifies the personal identification documents of all candidates to ensure they are of legal working age. If any instances of child labour or forced labour are discovered, the Group will take immediate action to terminate the employment, and investigations will be conducted. During the Reporting Period, the Group was not aware of any non-compliance related to child labour or forced labour.

### ■ Promoting Employee Well-being

OSL Group believes that a good work-life balance positively impacts employees' performance, loyalty, and physical and mental health. As such, the Group regularly reviews its employee benefits packages against market benchmarks to ensure they remain relevant and continue to support staff well-being.

To accommodate diverse needs, the Group provides remote working options and flexible working arrangements, allowing employees to work from home or other OSL Group offices based on their job nature, business requirements, and personal circumstances. Employee mobility programmes are also in place, which helps enable staff to relocate to different offices. It helps the Group effectively allocate resources to mitigate challenges while supporting employee development.

To demonstrate care and support for its workforce, the Group offers various types of leave, such as marriage leave, maternity and paternity leave, study leave, and birthday leave.

### ■ Health and Workplace Safety

The Group is dedicated to establishing a work environment that promotes both physical and mental well-being. The Group's comprehensive health and safety policies, detailed in the employee handbook, provide clear guidance for handling emergencies such as fires and injuries. During the Reporting Period, the Group was not aware of any material non-compliance regarding health and safety regulations.

Considering the Group's core activities in digital asset operations, the likelihood of workplace accidents is comparatively low. In addition to supporting employee well-being, the Group provides comprehensive insurance coverage that includes a wide range of medical services, such as hospital stays, surgeries, outpatient treatment, dental care, and wellness supports. Over the past few years, the Group has introduced multiple wellness programmes, including workshops focused on building resilience, physical fitness seminars, and offering healthier dining choices.

During the Reporting Period, the Group held a Fire Safety Seminar as part of its commitment to workplace safety. This initiative underscores the Group's commitment to preparing employees for emergencies, in line with its goal of a health and safe workplace.





# EFFECTIVE GOVERNANCE & OPERATIONAL EXCELLENCE



# 7.

## EFFECTIVE GOVERNANCE & OPERATIONAL EXCELLENCE

### Strategic approach:

- Execute strategic management of business risks and opportunities across the Group's operations
- Ensure continuous effectiveness and relevance of the risk management framework in sustainable practices
- Drive operational excellence by ensuring regulatory compliance while delivering long-term stakeholder value
- Cultivate a culture of ethics and enhance operational transparency

The Group upholds exemplary standards in regulatory compliance and operational transparency while fostering the development of fair and efficient digital asset markets. The Group recognises both the transformative potential of digital assets in promoting financial inclusion and their role as a store of value during periods of global uncertainty, while maintaining a pragmatic approach to managing associated technological and operational risks.

The Group has developed and implemented a sophisticated compliance framework which adopts regulatory standards, including AML and countering the financing of terrorism (CTF), aligning with requirements for financial institutions in Hong Kong and other key markets. To safeguard platform integrity, the Group deploys institutional-grade AML systems and rigorous “know-your-customer” (KYC) standard. In addition, the OSL platform leverages advanced blockchain analytics capabilities to conduct comprehensive source tracking of digital assets and strengthen its compliance infrastructure.

To address compliance and security challenges within the digital asset ecosystem, the Group has instituted a comprehensive suite of policies and control measures that cover conflicts of interest, market surveillance and transaction monitoring tools to foster fair and orderly digital asset markets. Furthermore, the Group has implemented rigorous security protocols that align with industry-leading standards, complemented by dedicated insurance coverage that mitigates potential risks associated with digital asset custody on the Group’s platforms. In safeguarding user data and privacy interests, the Group maintains and regularly updates its Privacy Policy in accordance with applicable regulatory requirements and industry standards.

In demonstrating its commitment to ethical business conduct, the Group upholds the highest standards of honesty, integrity, and fairness throughout its operations. This commitment extends to the Group’s marketing and communication practices, where all materials undergo review processes to ensure continued compliance with regulatory requirements across its operational jurisdictions.

During the Reporting Period, the Group was not aware of any material non-compliance regarding advertising regulations, or privacy requirements. Similarly, no incidents related to financial crimes, including bribery, extortion, fraud, or money laundering, were recorded.

## ■ Corporate Governance and Business Ethics

Robust corporate governance serves as a fundamental pillar in generating sustainable value for shareholders. Recognising this imperative, the Group maintains exemplary corporate governance standards that establish the foundation for responsible, transparent, and ethical business conduct. Through the implementation of effective governance mechanisms, the Group safeguards shareholder interests, strengthens market confidence, and optimises risk management while facilitating strategic decision-making that drives long-term value creation and reinforces corporate accountability. For more information regarding the Group’s governance framework, please refer to the Corporate Governance Report within the Group’s FY2024 Annual Report.

The Group sets international benchmarks for compliance while maintaining unwavering commitment to ethical business practices. Through comprehensive measures, including stringent personal account dealing policies and mandatory staff training covering ethics, business standards, and anti-corruption practices, the Group cultivates a robust culture of integrity and compliance. The Group also regularly reviews and updates its policies to strengthen business resilience and meet stakeholder expectations. The Employee’s Code of Conduct establishes behavioural standards aligned with core corporate values, requiring annual review and compliance from all employees.



### ■ Anti-bribery and corruption

In addressing corruption and bribery risks, the Group upholds a zero-tolerance approach through a comprehensive anti-corruption and anti-bribery management framework that aligns with local regulations, including the Prevention of Bribery Ordinance, financial professional ethics guidelines, and industry best practices. This annually reviewed and updated framework delineates relevant principles, requirements, and implementation guidelines while establishing clear roles, responsibilities, and evaluation processes, training initiatives, and whistleblowing procedures.

In addition, the Group established an Anti-Bribery and Corruption Policy that enforces strict anti-corruption measures, fosters a culture of integrity, and ensures global compliance with anti-bribery laws. To raise employee awareness, the policy is explained to all new hires as part of their onboarding process, and refresher training is conducted on a periodic basis.

### ■ Whistleblowing

The Group's commitment to ethical conduct is further reinforced through its comprehensive whistleblowing framework. Understanding the vital role of effective grievance channels in preventing unethical practices, promoting good corporate culture, protecting stakeholder rights, and ensuring sustainable development, the Group has formalised its commitment through the Whistleblowing Policy. This Policy establishes secure and confidential channels for employees, third parties, and external individuals to report concerns about improprieties, while ensuring protection from retaliation and upholding the Group's reputation through systematic misconduct prevention and resolution. To effectively implement these commitments, the whistleblowing framework encompasses:

- **Diverse communication channels:** The Group has established multiple reporting mechanisms including anonymous telephone hotlines, postal correspondence, electronic mail, and digital platforms.
- **Efficient investigation process:** The Group maintains rigorous protocols ensuring prompt response to and thorough investigation of all reported matters. These procedures maintain strict confidentiality throughout the investigative process and subsequent actions.
- **Whistleblower protection:** To safeguard whistleblower interests, the Group arranges dedicated subject matter specialists who conduct investigations with utmost discretion. These experts implement protective measures to maintain anonymity and ensure personal security, while strictly prohibiting any form of retaliation.

During the Reporting Period, no criminal offenses or misconduct were reported through these channels.

### ■ Anti-money laundering and counter-terrorist financing

The Group also has established an Anti-Money Laundering and Counter-Terrorist Financing ("**AML/CTF**") framework as a cornerstone of its operational compliance, strictly adhering to relevant laws, regulatory requirements, and international standards including the Financial Action Task Force recommendations.

Under the leadership of the Group's Risk Committee, which establishes clear AML/CTF guidelines, the Group implements rigorous control measures across all business units. These measures encompass customer acceptance protocols, customer due diligence processes, continuous transaction monitoring, suspicious transaction investigation, whistleblowing, and record-keeping systems, all supported by screening and suspicious transaction monitoring systems that effectively identify suspicious activities.

To strengthen its AML/CTF capabilities, the Group conducts regular assessments that thoroughly examine the effectiveness of control mechanisms and identify areas for enhancement. The Group has also implemented the Fraud Management Policy through which it actively educates customers about AML/CTF considerations and provides timely guidance, reinforcing its commitment to preventing financial crime.

Additionally, the Group maintains a robust training programme to ensure AML/CTF compliance, including mandatory annual training for all employees, comprehensive courses for new and frontline staff, and expert-led sessions featuring the latest regulatory updates and case studies.

## ■ Risk Management

Effective risk management serves as a cornerstone for sustainable operations and client trust in the digital asset industry. The Board has ultimate responsibility for oversight of the Group's risk management activities. The Board's Risk Management Committee is responsible for advising the Board on the Group's overall risk tolerance and risk management strategies. The Board's Risk Management Committee is supported by the Group Risk Committee and various subcommittees such as the Operational Risk Committee, the Crisis Management Team, the Client Onboarding Committee, the Technology Risk Committee and the New Product Committee, each of which comprises various members of senior management and operational department heads.

The Group implements an integrated framework combining the Group's oversight with enterprise-wide risk awareness. The framework operates through both top-down and bottom-up mechanisms. The framework, which operates under a "four lines of defence" model, addresses various risk factors including market and credit risk, technology and cybersecurity risk, operational risk, ESG risks, as well as legal, regulatory, fraud and reputational risk. Through this structured approach, the Group ensures effective risk identification, measurement, monitoring, and control.

The top-down component establishes systematic risk identification and mitigation protocols. Complementing this, the bottom-up approach positions every employee as a risk manager, emphasising immediate risk reporting as a core responsibility. The Group maintains a clear escalation pathway from line managers through department heads, if necessary, to the Group's Crisis Management Team ("**CMT**").

In response to the complex and evolving business landscape, the Group has established a crisis management system centred on its Business Continuity methodology. This framework is anchored in three fundamental principles:

- Prioritising staff safety.
- Maintaining operational capability.
- Ensuring client experience and security.

When incidents requiring management intervention arise, the CMT assumes command in accordance with the Group Crisis Management Plan. The CMT serves as a centralised decision-making authority and single point of contact, ensuring clear communication channels and eliminating potential confusion in both internal and external communications. In business continuity management, the CMT leads the specifying, testing, and implementation of fail-over mechanisms that integrate both technical disaster recovery and departmental business continuity procedures. The Group also regularly reviews and enhances its crisis management plan to maintain its effectiveness in response to operational changes and evolving business contexts.

## ■ Cybersecurity and Data Protection

### ■ Cybersecurity

Given the nature of its operations, the Group may encounter sophisticated cyber threats. In response, the Group has established a comprehensive cybersecurity framework designed to combat these challenges. This integrated framework enables the Group to identify and evaluate risks across all organisational levels, allowing it to take pre-emptive measures against potential vulnerabilities while ensuring the protection of its digital infrastructure. The Group's security strategy implements a "defense in depth" approach to safeguard information and system resources, encompassing various technical measures including:

- Rigorous traffic control and whitelisting protocols;
- Segregation of applications and services;
- Multi-factor authentication enforcement;
- System-wide monitoring and threat detection;
- Vulnerability assessment and patch management;
- Security baseline configurations throughout systems and services.

The Group's defense strategy operates across multiple dimensions:

- **Digital defense:** Cold wallets are based on an air-gapped infrastructure located within secure vaults.
- **Physical defense:** Secure vaults are designed with robust physical protections, such as man traps, biometric authentication, dual control systems, CCTV surveillance, and round-the-clock monitoring.
- **Process defense:** All custody systems, processes, and operations follow strict segregation of duties, dual control, and split knowledge, ensuring end-to-end security and maximising the protection of client assets.
- **Slippage detection and prevention:** It includes 24/7 real-time monitoring of both cold and hot wallets, along with reconciliation against various data sources to identify any anomalies. In case of a detected anomaly, emergency withdrawal controls can immediately stop all asset withdrawals. Additionally, integrated blacklist systems with address whitelisting capabilities are available to ensure transactions are conducted only with verified client addresses.
- **Insurance:** Insurance coverage is available for hot and cold wallets that store client assets.

The Group maintains the framework's effectiveness through regular reviews and updates, ensuring alignment with evolving industry best practices and emerging threats. This proactive approach to cybersecurity management demonstrates the Group's commitment to maintaining the highest standards of digital asset protection while adapting to the dynamic nature of cyber threats in the digital asset industry.



### Information Security and Customer Privacy Protection

The Group has established a comprehensive information security framework aligned with its commitment to providing secure and compliant services. This framework is underpinned by a suite of policies including the Privacy Policy and Data Classification, Security, Protection and Lifecycle Policy, which collectively govern the protection of diverse information assets ranging from client and employee personal data to strategic financial information and technical assets.

Building upon the framework, the Group has established an extensive cybersecurity framework designed to protect and preserve the confidentiality of all organisational information assets. The Group has established a multi-layered cybersecurity framework built on the following core principles:

- Implementation of access control mechanisms to safeguard against unauthorised system access;
- Enforcement of confidentiality protocols to ensure sensitive information remains protected;
- Application of rigorous data integrity measures to prevent information corruption or tampering;
- Maintenance of robust systems to guarantee uninterrupted access to business-critical information; and
- Employment of continuous security monitoring and enhancement processes to adapt to emerging threats.

The Group also implements a multi-layered governance structure to ensure robust information security management. At the operational level, individual business units serve as first-line risk owners, while the Chief Information Security Officer, Chief Risk Officer, and Chief Information Officer maintain primary control responsibilities. The Technology Risk Committee provides secondary oversight, escalating significant cyber risks to the Board Risk Management Committee when necessary. This structure is reinforced through regular staff training programmes and proactive cybersecurity monitoring.

The Group conducts regular comprehensive information security training programmes, which cover emerging threats, security protocols, and best practices in digital asset protection, with mandatory participation across all organisational levels. Through continuous assessment and feedback mechanisms, the Group ensures training effectiveness while maintaining a robust incident reporting system. A dedicated cybersecurity team monitors system alerts and escalates significant security events to the internal incident response team when necessary.

There were no substantiated complaints concerning breaches of customer privacy or losses of customer data for the Group during the Reporting Period.

### Wallet Operations

The Group maintains a specialised wallet operations team providing 24/7 service for digital asset management, including asset transfers between hot wallets, cold wallets, and client accounts. The operational framework adheres to industry-leading internal control standards, incorporating dual control mechanisms, four-eyes check, duty segregation, and split knowledge principles throughout the wallet lifecycle management process.

With dual control, no single member of staff in the Group can perform any wallet function. Wallet withdrawals are initiated exclusively through the Group's platform interface by users, with subsequent processing by the wallet operations team under a stringent maker-checker authorisation protocol (four-eyes check principle) for asset transfers and sensitive operations. The system enforces transaction limits and facilitates customer address whitelisting capabilities. For enhanced security, certain transactions require checker authorisation from geographically distributed overseas approvers.

The Group deploys a continuously monitored reconciliation engine operating 24/7, which performs real-time transaction tracking and digital asset transfer monitoring through sophisticated 2-way and 3-way matching algorithms. Dedicated engine operators conduct supplementary verifications when anomalies are detected.

Standard Operating Procedure ("**SOP**") govern all wallet operational aspects, encompassing wallet management, hot and cold wallet withdrawal protocols, vault access enrolment procedures, and vault operations. The Group requires all wallet operations personnel to undergo initial training and periodic refresher courses. New team members operate under supervision post-training to ensure operational excellence and must complete mandatory employee screening procedures.

The Group conducts regular Business Impact Analysis ("**BIA**") to inform the development and enhancement of Business Continuity Plans ("**BCP**"). As an integral component of the BCP framework, regular Disaster Recovery (DR) drills are executed to ensure operational resilience.

### ■ Vault Safety

The Group's digital asset private keys are securely hosted in Federal Information Processing Standard (FIPS) 140-2 compliant hardware security modules ("**HSMs**") within dedicated physical security vaults. The vault feature multi-layered protection, including 24/7 dedicated intrusion monitoring by an independent team, comprehensive CCTV coverage, and round-the-clock security personnel. Access control combines man-trap doors with biometric authentication and traditional locks, with strict entry logging protocols. The technical infrastructure employs air-gapped computers connected to HSMs, ensuring complete network isolation even during transactions. Wallet infrastructure software is proprietary, with systems and hardware sourced from trusted vendors and configured under supervision. All systems require hardware-based two-factor authentication. To maintain operational resilience, the Group maintains disaster recovery sites with annual drills. This integrated approach ensures maximum security for digital assets, with non-exportable private keys permanently secured within the vault environment.

### ■ Service Excellence

The Group prides itself on customer care and social responsibility. Customers are at the heart of its service strategy, planning and execution.

In delivering exceptional customer service and upholding social responsibility, the Group places client satisfaction at the forefront of its operational strategy. A systematic approach to customer feedback and complaint management has been implemented through the Complaints Handling Policy, which ensures methodical processing of all disputes and complaints. To maintain service excellence, the Group has established SOPs for client communications. Under this framework, the Compliance department serves as the central point for handling all client complaints. The process follows a structured approach where each complaint undergoes thorough investigation and analysis by the Compliance department, with findings subsequently reported to senior management for review.

The complaint resolution process is robust and transparent. Senior management evaluates investigation reports to determine complaint validity and, where warranted, establishes appropriate rectification or compensation measures. These decisions are promptly communicated to clients to ensure timely resolution. Following complaint resolution, senior management and Compliance conduct a systematic review to identify potential areas for enhancement in internal controls and procedures.

During the Reporting Period, no substantial client complaints regarding our products and services were recorded.

### ■ Intellectual Property and Brand Management

The Group maintains a comprehensive approach to intellectual property protection through registration and sustained usage of domain names and trademarks. A proactive monitoring system ensures timely renewals, preventing any potential expiration of these valuable assets. Swift action is also taken against unauthorised parties who disseminate misleading information or inaccurate materials concerning the Group, its intellectual properties (IP), brands, or subsidiary entities.

All marketing materials, advertising content, and communications, both internal and external, are developed with transparent and precise information about the Group's practices, thereby ensuring full respect for and compliance with third-party intellectual property rights, patents, and other proprietary rights.

Throughout the Reporting Period, no incidents of non-compliance with regulations and voluntary codes related to product and service information, marketing communications (including advertising, promotion and sponsorship) and intellectual property rights were identified.

### ■ Supply Chain Management

The Group maintains strategic partnerships with its suppliers, emphasising long-term collaboration and mutual growth. The Group's supplier engagement framework is built upon principles of contractual compliance, equitable treatment, and professional respect. The Group operates under a Procurement Requisition Procedure that establishes a structured procurement methodology through detailed flowcharts and guidelines, with defined exemptions. This framework ensures comprehensive documentation throughout the procurement lifecycle and clearly delineates departmental responsibilities to maintain accountability and operational efficiency.

The Group's service provider ecosystem primarily encompasses information technology, professional services, and marketing expertise. To ensure systematic supplier management, the Group implements a comprehensive policy framework with standardised procedures and operational protocols. Certain new supplier onboarding involves rigorous risk assessment and due diligence procedures to mitigate potential risks and validate service delivery capabilities.

The Group also employs a well-established supplier selection mechanism incorporating multiple evaluation criteria, including commercial terms, service responsiveness, operational capabilities, and demonstrated expertise. Preference is given to potential suppliers who demonstrate their commitment to the environment in the supplier selection process. The Group maintains vigilant monitoring of suppliers' environmental performance, with established protocols for review and potential relationship reassessment should environmental concerns arise. The supplier oversight extends to regular compliance reviews focusing on anti-corruption practices, bribery prevention, and conflict of interest declarations, while ensuring strict adherence to relevant regulations and client confidentiality requirements.



During the Reporting Period, the Group's supplier base comprised 165 partners. Further details on the geographical distribution of suppliers are available in Appendix I. The Group was not aware of any key suppliers that had any significant actual or potential negative impact on business ethics, environmental protection, human rights and labour practices, nor did any supplier have any non-compliance incident with respect to human rights or environmental issues.

### ■ Social Responsibility

The Group acknowledges and embraces the multifaceted nature of societal diversity, encompassing varied cultural backgrounds and community requirements. Through community engagement initiatives, the Group strives to support programmes that generate positive societal impact while aligning with its corporate values and sustainability objectives, demonstrating profound respect for cultural distinctiveness and diverse community needs.

To optimise resource allocation and maintain systematic oversight of charitable activities, the Group has established a "Charitable Contributions Review Procedure". Under this framework, the Compliance Department conducts screening of employee-initiated charitable contribution requests, with subsequent approval authority vested in the Senior Management and Executive Committee.

The Group's community support extends to equipment donation initiatives, whereby assets have no residual value and have limited resale value are considered for contribution to non-profit entities, including educational institutions, charitable organisations, and volunteer groups. The Group promotes active community engagement through employee participation in social welfare activities and voluntary services. At the leadership level, the Directors maintain ongoing dialogue with non-governmental organisations to gain deeper insights into community needs, enabling the Group to fulfill its social responsibilities effectively and contribute meaningfully to society's development.

During the Reporting Period, the Group supported 2024 HKSI Institute Case Competition with over 250 students participating in the sustainability-themed challenge. As the project sponsor, we provided coaching and mentorship to help participants develop innovative solutions, fostering the growth and development of young talent. Charitable donations made by the Group during the Reporting Period amounted to HK\$150,000.

## APPENDIX I: SUSTAINABILITY PERFORMANCE DATA OVERVIEW

### Environmental

#### Air Emissions<sup>1</sup>

Air emissions	Unit	2024	2023	2022
Nitrogen oxides (NO <sub>x</sub> )	kg	–	10.832	0.204
Sulphur oxides (SO <sub>x</sub> )	kg	–	0.001	0.018
Particulate Matter (PM)	kg	–	1.018	0.036

#### Greenhouse Gas (GHG) Emissions<sup>2</sup>

GHG emissions	Unit	2024	2023	2022
Direct GHG emissions (Scope 1) <sup>3</sup>	tCO <sub>2</sub> eq	–	2.62	2.72
Indirect GHG emissions (Scope 2) <sup>4</sup>	tCO <sub>2</sub> eq	97.84	381.58	175.58
Other indirect GHG emissions (Scope 3) <sup>5</sup>	tCO <sub>2</sub> eq	67.47	65.86	49.87
<b>Total Scope 1 and 2 GHG emissions</b>	<b>tCO<sub>2</sub>eq</b>	<b>97.84</b>	<b>384.20</b>	<b>178.30</b>
<b>Total Scope 1, 2 and 3 GHG emissions</b>	<b>tCO<sub>2</sub>eq</b>	<b>165.31</b>	<b>450.06</b>	<b>228.17</b>

<sup>1</sup> During the year, the Group did not record data relating to vehicle fuel consumption. Numbers for 2023 and 2022 include the emission from fuel consumption of the Group's vehicle(s). Air emissions are calculated using methodologies and emission factors based on

- "How to prepare an ESG Report – Appendix 2: Reporting Guidance on Environmental KPIs" issued by HKEX;
- "General Guideline of the Greenhouse Gas Emissions Accounting and Reporting for Industrial Enterprises (Trial)" issued by the National Development and Reform Commission of the People's Republic of China; and
- the "Energy Statistics Manual" issued by the IEA.

<sup>2</sup> GHG emissions are calculated using methodologies, emission factors and global warming potential rates based on

- "How to prepare an ESG Report – Appendix 2: Reporting Guidance on Environmental KPIs" issued by HKEX;
- "General Guideline of the Greenhouse Gas Emissions Accounting and Reporting for Industrial Enterprises (Trial)" issued by the National Development and Reform Commission of the People's Republic of China;
- "ICAO Carbon Emissions Calculator" developed by the International Civil Aviation Organisation ("ICAO");
- the "Energy Statistics Manual" issued by the IEA; and
- "Synthesis Report of the Fifth Assessment Report" issued by the IPCC. Carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>) and nitrous oxides (N<sub>2</sub>O) are included in GHG calculations.

<sup>3</sup> During the year, the Group did not record vehicle fuel consumption and gas consumption. Direct GHG emissions (Scope 1) for 2023 and 2022 include the emission from fuel consumption of the Group's vehicle(s) and town gas.

<sup>4</sup> Indirect GHG emissions (Scope 2) include the emission from electricity consumption from the Group's offices in Hong Kong and Mainland China. The Group uses business service centres in other regions where the electricity consumption costs are included in rental expenses and therefore are not included.

<sup>5</sup> Other indirect GHG emissions (Scope 3) include the emission from transportation of employees for business-related activities, paper waste disposal and usage of water.

### GHG emissions intensity

GHG emissions intensity	Unit	2024	2023	2022
Total Scope 1 and 2 GHG emissions/ office area <sup>6</sup>	tCO <sub>2</sub> eq/m <sup>2</sup>	0.04	0.11	0.05
Total Scope 1, 2 and 3 GHG emissions/ office area <sup>6</sup>	tCO <sub>2</sub> eq/m <sup>2</sup>	0.07	0.13	0.07
Total Scope 1 and 2 GHG emissions/ number of employees <sup>7</sup>	tCO <sub>2</sub> eq/headcount	0.47	3.10	0.85
Total Scope 1, 2 and 3 GHG emissions/ number of employees <sup>7</sup>	tCO <sub>2</sub> eq/headcount	0.79	3.63	1.09

### Waste management<sup>8</sup>

Waste management	Unit	2024	2023	2022
Hazardous waste – Toner waste generated <sup>9</sup>	Tonnes	–	–	0.004
Non-hazardous waste – Paper waste generated	Tonnes	7.90	5.28	0.97
Hazardous waste intensity <sup>7</sup>	Tonnes/headcount	–	–	0.00002
Non-hazardous waste intensity <sup>7</sup>	Tonnes/headcount	0.038	0.043	0.005
Total waste intensity <sup>7</sup>	Tonnes/headcount	0.038	0.043	0.005

<sup>6</sup> The gross floor area of the Group's Hong Kong and Mainland China offices in 2022, 2023 and 2024 are 3,478 m<sup>2</sup>, 3,478 m<sup>2</sup> and 2,288 m<sup>2</sup> respectively.

<sup>7</sup> The denominator used for calculation is the total number of employees in 2022, 2023 and 2024, which are 209, 124 and 228 respectively.

<sup>8</sup> Numbers include the waste generated from the Group's offices in Hong Kong and Mainland China.

<sup>9</sup> During the year, the Group did not generate hazardous waste. Hazardous waste generated in 2022 were collected by licensed waste collectors.



### Direct & indirect energy consumption<sup>10</sup>

Energy consumption	Unit	2024	2023	2022
Direct energy consumption – Gasoline	Litres	–	960	1,200
	kWh in '000s	–	9.05	11.06
	GJ	–	32.58	39.82
Indirect energy consumption	kWh in '000s	222.13	637.24	252.75
– Purchased electricity <sup>11</sup>	GJ	799.68	2,294.06	909.89
Total energy consumption	kWh in '000s	222.13	646.29	263.81
	GJ	799.68	2,326.64	949.72

Energy consumption intensity	Unit	2024	2023	2022
Direct energy consumption/ number of employees <sup>7</sup>	kWh in '000s/headcount	–	0.07	0.05
	GJ/headcount	–	0.26	0.19
Indirect energy consumption/ number of employees <sup>7</sup>	kWh in '000s/headcount	1.07	5.14	1.21
	GJ/headcount	3.84	18.50	4.35
Total energy consumption/ number of employees <sup>7</sup>	kWh in '000s/headcount	1.07	5.14	1.26
	GJ/headcount	3.84	18.50	4.54

<sup>7</sup> The denominator used for calculation is the total number of employees in 2022, 2023 and 2024, which are 209, 124 and 228 respectively.

<sup>10</sup> Numbers are calculated using methodologies and conversion factors based on

- “How to prepare an ESG Report – Appendix 2: Reporting Guidance on Environmental KPIs” issued by the HKEX;
- “General Guideline of the Greenhouse Gas Emissions Accounting and Reporting for Industrial Enterprises (Trial)” issued by the National Development and Reform Commission of the People’s Republic of China; and
- the “Energy Statistics Manual” issued by the IEA.

<sup>11</sup> Indirect energy consumption includes the electricity consumption from the Group’s offices in Hong Kong and Mainland China. The Group uses business service centres in other regions where electricity consumption costs are included in rental expenses. No separate electricity usage data were obtained.

## Social

### Total number of employees by gender, age group, employee type, geographical region and employee category

Breakdown	2024		2023 <sup>12</sup>		2022	
	Number	% of total staff	Number	% of total staff	Number	% of total staff
<b>Total number of employees by gender</b>						
Female	57	25.0	38	30.6	71	34.0
Male	171	75.0	86	69.4	138	66.0
<b>Total number of employee by age group</b>						
Age <30	47	20.6	31	25.0	47	22.5
Age 30–50	166	72.8	83	66.9	147	70.3
Age >50	15	6.6	10	8.1	15	7.2
<b>Total number of employees by employment type</b>						
Full-time	228	100	120	96.8	205	98.1
Non full-time	0	0	4	3.2	4	1.9
<b>Total number of employees by geographical region</b>						
Hong Kong	156	68.4	99	79.8	140	67.0
Mainland China	55	24.1	4	3.2	4	1.9
Singapore	15	6.6	10	8.1	19	9.1
Others	2	0.9	11	8.9	46	22.0
<b>Total number of employees by employee category</b>						
Senior management	19	8.3	16	12.9	21	10.0
Mid-level employees	56	24.6	64	51.6	115	55.0
General employees	153	67.1	44	35.5	73	34.9
<b>Total</b>	<b>228</b>		<b>124</b>		<b>209</b>	

<sup>12</sup> Percentage of total staff breakdown for 2023 have been recalculated and restated to reflect the actual situation.

### New employee hires by geographical region, age group and gender

Breakdown <sup>13</sup>	2024		2023		2022	
	Number	%	Number	%	Number	%
<b>Number of new employees hires and corresponding rate by gender</b>						
Female	50	105.3	10	18.3	27	35.5
Male	153	119.1	25	22.3	57	38.5
<b>Number of new employees hires and corresponding rate by age group</b>						
Age <30	44	112.8	19	48.7	26	48.1
Age 30–50	154	123.7	15	13.0	54	34.8
Age >50	5	40.0	1	8.0	4	26.7
<b>Number of new employees hires and corresponding rate by geographical region</b>						
Hong Kong	134	105.1	31	25.9	54	33.4
Mainland China	53	179.7	–	–	–	–
Singapore	14	112.0	2	13.8	9	48.6
Others	2	30.8	2	7.0	21	55.3
<b>Total</b>	<b>203</b>	<b>115.3</b>	<b>35</b>	<b>21.0</b>	<b>84</b>	<b>37.5</b>

### Employee turnover by geographical region, age group and gender

Breakdown <sup>14</sup>	2024		2023		2022	
	Number	%	Number	%	Number	%
<b>Total number of employee turnover and corresponding turnover rate by gender</b>						
Female	33	69.5	41	75.2	71	93.4
Male	89	69.3	76	60.9	38	25.7
<b>Total number of employee turnover and corresponding turnover rate by age group</b>						
Age <30	37	94.9	35	89.7	17	31.5
Age 30–50	79	63.5	73	63.5	87	56.1
Age >50	6	48.0	9	72	5	33.3
<b>Total number of employee turnover and corresponding turnover rate by geographical region</b>						
Hong Kong	84	65.9	66	55.2	75	46.4
Mainland China	23	78.0	–	–	4	66.7
Singapore	7	56.0	13	89.7	15	81.1
Others	8	123.1	38	133.3	15	39.5
<b>Total</b>	<b>122</b>	<b>69.3</b>	<b>117</b>	<b>70.3</b>	<b>109</b>	<b>48.7</b>

<sup>13</sup> New employee hires percentage = Number of new employees hired (of the specified category) during the corresponding year / Average number of employees (of the specified category) during the corresponding year.

<sup>14</sup> Employee turnover percentage = Number of employees (of the specified category) left during the corresponding year / Average number of employees (of the specified category) during the corresponding year.



## Training and development

Breakdown	2024		2023		2022	
	Number	%	Number	%	Number	%
<b>Total training hours and training percentage</b>	1,792	86.0	1,172	99.2	2,194	99.0
<b>Average training hours per employee</b>	9.14		9.45		10.50	
<b>Average training hours per employee by gender</b>						
Female	9.17	82.5	9.59	100	9.69	98.6
Male	9.13	87.1	9.39	98.8	10.91	99.3
<b>Average training hours by employee category and training percentage</b>						
Senior management	21.08	63.2	8.91	93.8	10.38	95.2
Mid-level employees	8.63	91.1	9.60	100	10.50	99.1
General employees	8.26	86.9	9.43	100	10.52	100

## Misconduct cases

Breakdown	2024	2023	2022
<b>Confirmed incidents categories</b>			
Discrimination	—	—	—
Corruption	—	—	—
Breaches of customer privacy	—	—	—

## Occupational health and safety performance

Breakdown	2024	2023	2022
Number of fatalities as a result of work-related injury	—	—	—
Fatalities rate as a result of work-related injury	—	—	—
Lost days due to work injury	—	—	—
Rate of lost days due to work injury	—	—	—

## Supply chain

Breakdown	Total	Information Technology ("IT")	Non-IT
<b>Total number of suppliers during the Reporting Period</b>	165	39	126
<b>Number of suppliers by geographical region</b>			
Hong Kong	145	35	110
Mainland China	5	–	5
Singapore	5	2	3
Other regions	10	2	8

## Legal Compliance

### Non-compliance with rules and regulations

Breakdown	2024	2023	2022
<b>Number of significant instances of noncompliance with laws and regulations by category</b>			
Environmental	–	–	–
Employment	–	–	–
Health and safety	–	–	–
Labour Standards	–	–	–
Product responsibility	–	–	–
Anti-corruption	–	–	–

## APPENDIX II:

### HKEX ESG REPORTING GUIDE CONTENT INDEX

HKEX ESG Reporting Guide Reference	Description	Section of the Report
<b>A. Environmental</b>		
<b>Aspect A1: Emissions</b>	<b>General Disclosure</b> Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to air and greenhouse gas emissions, discharges into water and land, and generation of hazardous and non-hazardous waste.	5. SUSTAINABLE CARBON MANAGEMENT
	KPI A1.1 The types of emissions and respective emissions data.	5. SUSTAINABLE CARBON MANAGEMENT – Emissions Management and Reducing Carbon Footprint and Appendix I
	KPI A1.2 Direct (Scope 1) and energy indirect (Scope 2) greenhouse gas emissions (in tonnes) and, where appropriate, intensity (e.g. per unit of production volume, per facility).	5. SUSTAINABLE CARBON MANAGEMENT – Emissions Management and Reducing Carbon Footprint and Appendix I
	KPI A1.3 Total hazardous waste produced (in tonnes) and, where appropriate, intensity (e.g. per unit of production volume, per facility).	5. SUSTAINABLE CARBON MANAGEMENT – Waste Management and Appendix I
	KPI A1.4 Total non-hazardous waste produced (in tonnes) and, where appropriate, intensity e.g. per unit of production volume, per facility).	5. SUSTAINABLE CARBON MANAGEMENT – Waste Management and Appendix I
	KPI A1.5 Description of emissions target(s) set and steps taken to achieve them.	5. SUSTAINABLE CARBON MANAGEMENT
	KPI A1.6 Description of how hazardous and non-hazardous wastes are handled, and a description of reduction target(s) set and steps taken to achieve them.	5. SUSTAINABLE CARBON MANAGEMENT – Waste Management



HKEX ESG Reporting Guide Reference	Description	Section of the Report
<b>Aspect A2:</b> <i>Use of Resources</i>	<b>General Disclosure</b> Policies on the efficient use of resources, including energy, water and other raw materials.	5. SUSTAINABLE CARBON MANAGEMENT – Use of Resources
	KPI A2.1 Direct and/or indirect energy consumption by type (e.g. electricity, gas or oil) in total (kWh in '000s) and intensity (e.g. per unit of production volume, per facility).	5. SUSTAINABLE CARBON MANAGEMENT – Use of Resources and Appendix I
	KPI A2.2 Water consumption in total and intensity (e.g. per unit of production volume, per facility).	Individual offices do not have separate water meters to measure usage, so the data cannot be disclosed.
	KPI A2.3 Description of energy use efficiency target(s) set and steps taken to achieve them.	5. SUSTAINABLE CARBON MANAGEMENT – Use of Resources
	KPI A2.4 Description of whether there is any issue in sourcing water that is fit for purpose, water efficiency target(s) set and steps taken to achieve them.	Not applicable as the Group did not have issue in sourcing water due to its business nature and locations.
	KPI A2.5 Total packaging material used for finished products (in tonnes) and, if applicable, with reference to per unit produced.	Due to the Group's business nature, the use of packaging material is considered as immaterial to the Group.
<b>Aspect A3:</b> <i>The Environmental and Natural Resources</i>	<b>General Disclosure</b> Policies on minimising the issuer's significant impacts on the environment and natural resources	5. SUSTAINABLE CARBON MANAGEMENT
	KPI A3.1 Description of the significant impacts of activities on the environment and natural resources and the actions taken to manage them.	5. SUSTAINABLE CARBON MANAGEMENT – The Environment and Natural Resources
<b>Aspect A4:</b> <i>Climate Change</i>	<b>General Disclosure</b> Policies on identification and mitigation of significant climate-related issues which have impacted, and those which may impact, the issuer.	5. SUSTAINABLE CARBON MANAGEMENT
	KPI A4.1 Description of the significant climate-related issues which have impacted, and those which may impact, the issuer, and the actions taken to manage them.	5. SUSTAINABLE CARBON MANAGEMENT – Responding to Climate Change

HKEX ESG Reporting Guide Reference	Description	Section of the Report
<b>B. Social</b>		
<b>Aspect B1: Employment</b>	<b>General Disclosure</b> Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to compensation and dismissal, recruitment and promotion, working hours, rest periods, equal opportunity, diversity, anti-discrimination, and other benefits and welfare.	6. PEOPLE-CENTRIC
	KPI B1.1 Total workforce by gender, employment type (for example, full- or part-time), age group and geographical region.	Appendix I
	KPI B1.2 Employee turnover rate by gender, age group and geographical region.	Appendix I
<b>Aspect B2: Health &amp; Safety</b>	<b>General Disclosure</b> Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to providing a safe working environment and protecting employees from occupational hazards.	6. PEOPLE-CENTRIC – Promoting Employee Well-being, 6. PEOPLE-CENTRIC – Health and Workplace Safety
	KPI B2.1 Number and rate of work-related fatalities occurred in each of the past three years including the reporting year.	Appendix I
	KPI B2.2 Lost days due to work injury.	Appendix I
	KPI B2.3 Description of occupational health and safety measures adopted, and how they are implemented and monitored.	6. PEOPLE-CENTRIC – Promoting Employee Well-being, 6. PEOPLE-CENTRIC – Health and Workplace Safety
<b>Aspect B3: Development &amp; Training</b>	<b>General Disclosure</b> Policies on improving employees' knowledge and skills for discharging duties at work. Description of training activities.	6. PEOPLE-CENTRIC – Learning and Development
	KPI B3.1 The percentage of employees trained by gender and employee category (e.g. senior management, middle management).	Appendix I
	KPI B3.2 The average training hours completed per employee by gender and employee category.	Appendix I

HKEX ESG Reporting Guide Reference	Description	Section of the Report
<b>Aspect B4:</b> <b>Labor Standards</b>	<b>General Disclosure</b> (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to preventing child and forced labour.	6. PEOPLE-CENTRIC – Promoting Diversity, Equity and Inclusion
	KPI B4.1 Description of measures to review employment practices to avoid child and forced labour.	6. PEOPLE-CENTRIC – Promoting Diversity, Equity and Inclusion
	KPI B4.2 Description of steps taken to eliminate such practices when discovered.	6. PEOPLE-CENTRIC – Promoting Diversity, Equity and Inclusion
<b>Aspect B5:</b> <b>Supply Chain Management</b>	<b>General Disclosure</b> Policies on managing environmental and social risks of the supply chain.	7. EFFECTIVE GOVERNANCE & OPERATIONAL EXCELLENCE – Supply Chain Management
	KPI B5.1 Number of suppliers by geographical region.	Appendix I
	KPI B5.2 Description of practices relating to engaging suppliers, number of suppliers where the practices are being implemented, and how they are implemented and monitored.	7. EFFECTIVE GOVERNANCE & OPERATIONAL EXCELLENCE – Supply Chain Management
	KPI B5.3 Description of practices used to identify environmental and social risks along the supply chain, and how they are implemented and monitored.	7. EFFECTIVE GOVERNANCE & OPERATIONAL EXCELLENCE – Supply Chain Management
	KPI B5.4 Description of practices used to promote environmentally preferable products and services when selecting suppliers, and how they are implemented and monitored.	7. EFFECTIVE GOVERNANCE & OPERATIONAL EXCELLENCE – Supply Chain Management

HKEX ESG Reporting Guide Reference	Description	Section of the Report
<b>Aspect B6: Product Responsibility</b>	<b>General Disclosure</b>	7. EFFECTIVE GOVERNANCE & OPERATIONAL EXCELLENCE
	(a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to health and safety, advertising, labelling and privacy matters relating to products and services provided and methods of redress.	
	KPI B6.1 Percentage of total products sold or shipped subject to recalls for safety and health reasons.	Due to the Group's business nature, the KPI is considered as immaterial to the Group.
	KPI B6.2 Number of products and service related complaints received and how they are dealt with.	7. EFFECTIVE GOVERNANCE & OPERATIONAL EXCELLENCE – Service Excellence
	KPI B6.3 Description of practices relating to observing and protecting intellectual property rights.	7. EFFECTIVE GOVERNANCE & OPERATIONAL EXCELLENCE – Intellectual Property and Brand Management
	KPI B6.4 Description of quality assurance process and recall procedures.	7. EFFECTIVE GOVERNANCE & OPERATIONAL EXCELLENCE – Service Excellence
KPI B6.5 Description of consumer data protection and privacy policies, and how they are implemented and monitored.		7. EFFECTIVE GOVERNANCE & OPERATIONAL EXCELLENCE – Cybersecurity and Data Protection



HKEX ESG Reporting Guide Reference	Description	Section of the Report
<b>Aspect B7:</b> <b>Anti-Corruption</b>	<b>General Disclosure</b> Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating	7. EFFECTIVE GOVERNANCE & OPERATIONAL EXCELLENCE – Corporate Governance and Business Ethics
	KPI B7.1      Number of concluded legal cases regarding corrupt practices brought against the issuer or its employees during the reporting period and the outcomes of the cases.	Appendix I
	KPI B7.2      Description of preventive measures and whistleblowing procedures, and how they are implemented and monitored.	7. EFFECTIVE GOVERNANCE & OPERATIONAL EXCELLENCE – Corporate Governance and Business Ethics
	KPI B7.3      Description of anti-corruption training provided to directors and staff.	7. EFFECTIVE GOVERNANCE & OPERATIONAL EXCELLENCE – Corporate Governance and Business Ethics
<b>Aspect B8:</b> <b>Community Investment</b>	<b>General Disclosure</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.	7. EFFECTIVE GOVERNANCE & OPERATIONAL EXCELLENCE – Social Responsibility
	KPI B8.1      Focus areas of contribution (e.g. education, environmental concerns, labour needs, health, culture, sport).	7. EFFECTIVE GOVERNANCE & OPERATIONAL EXCELLENCE – Social Responsibility
	KPI B8.2      Resources contributed (e.g. money or time) to the focus area.	7. EFFECTIVE GOVERNANCE & OPERATIONAL EXCELLENCE – Social Responsibility

## APPENDIX III: GRI CONTENT INDEX

Statement of use	OSL Group Limited has reported the information cited in this GRI content index for the period from 1 January 2024 to 31 December 2024 with reference to the GRI Standards.		
GRI 1 used	GRI 1: Foundation 2021		
GRI Standard	Disclosure		Location/Explanation
General Disclosure			
GRI 2: General Disclosures 2021	2-1	Organisational details	1. ABOUT THIS REPORT and 2. ABOUT OSL GROUP
	2-2	Entities included in the organisation’s sustainability reporting	1. ABOUT THIS REPORT and Annual Report 2024 – Notes to the Consolidated Financial Statements
	2-3	Reporting period, frequency and contact point	1. ABOUT THIS REPORT and 3. CHIEF EXECUTIVE OFFICER’S STATEMENT
	2-4	Restatements of information	Appendix I
	2-5	External assurance	The Group may consider seeking external assurance for the ESG report in future.
	2-6	Activities, value chain and other business relationships	2. ABOUT OSL GROUP, 7. EFFECTIVE GOVERNANCE & OPERATIONAL EXCELLENCE – Supply Chain Management and Annual Report 2024 – Management Discussion and Analysis
	2-7	Employees	Appendix I
	2-8	Workers who are not employees	N/A
	2-9	Governance structure and composition	Annual Report 2024 – Corporate Governance Report
	2-10	Nomination and selection of the highest governance body	Annual Report 2024 – Corporate Governance Report
	2-11	Chair of the highest governance body	Annual Report 2024 – Corporate Governance Report
	2-12	Role of the highest governance body in overseeing the management of impacts	4. APPROACH – ESG Governance and Annual Report 2024 – Corporate Governance Report

GRI Standard	Disclosure	Location/Explanation
	2-13	Delegation of responsibility for managing impacts 4. APPROACH – ESG Governance and Annual Report 2024 – Corporate Governance Report
	2-14	Role of the highest governance body in sustainability reporting 1. ABOUT THIS REPORT and 4. APPROACH – ESG Governance
	2-15	Conflicts of interest Annual Report 2024 – Corporate Governance Report
	2-16	Communication of critical concerns 4. APPROACH – ESG Strategy and 7. EFFECTIVE GOVERNANCE & OPERATIONAL EXCELLENCE – Corporate Governance and Business Ethics
	2-17	Collective knowledge of the highest governance body Annual Report 2024 – Corporate Governance Report
	2-18	Evaluation of the performance of the highest governance body Annual Report 2024 – Corporate Governance Report
	2-19	Remuneration policies Annual Report 2024 – Corporate Governance Report
	2-20	Process to determine remuneration Annual Report 2024 – Corporate Governance Report
	2-21	Annual total compensation ratio N/A: These metrics are affected by a range of factors including market trend and inflation rate. The Group provides competitive compensation with market benchmarking to ensure competitiveness.
	2-22	Statement on sustainable development strategy 3. CHIEF EXECUTIVE OFFICER'S STATEMENT
	2-23	Policy commitments 6. PEOPLE-CENTRIC – Promoting Diversity, Equity and Inclusion
	2-24	Embedding policy commitments 6. PEOPLE-CENTRIC – Promoting Diversity, Equity and Inclusion

GRI Standard	Disclosure		Location/Explanation
	2-25	Processes to remediate negative impacts	4. APPROACH – Stakeholders Engagement and 7. EFFECTIVE GOVERNANCE & OPERATIONAL EXCELLENCE – Corporate Governance and Business Ethics
	2-26	Mechanisms for seeking advice and raising concerns	4. APPROACH – Stakeholders Engagement and 7. EFFECTIVE GOVERNANCE & OPERATIONAL EXCELLENCE – Corporate Governance and Business Ethics
	2-27	Compliance with laws and regulations	Appendix I
	2-28	Membership associations	5. SUSTAINABLE CARBON MANAGEMENT – Responding to Climate Change
	2-29	Approach to stakeholder engagement	4. APPROACH – ESG Strategy
	2-30	Collective bargaining agreements	There are no formal collective bargaining agreements in place within the Group. All employees have the right and freedom to form and join trade unions.
<b>Material Topics</b>			
<b>GRI 3: Material Topics 2021</b>	3-1	Process to determine material topics	4. APPROACH – Materiality Assessment
	3-2	List of material topics	4. APPROACH – Materiality Matrix
<b>GRI 205: Anti-corruption 2016</b>			
<b>GRI 3: Material Topics 2021</b>	3-3	Management of material topics	7. EFFECTIVE GOVERNANCE & OPERATIONAL EXCELLENCE – Corporate Governance and Business Ethics
	205-3	Confirmed incidents of corruption and actions taken	Appendix I



GRI Standard	Disclosure		Location/Explanation
GRI 302: Energy 2016			
GRI 3: Material Topics 2021	3-3	Management of material topics	5. SUSTAINABLE CARBON MANAGEMENT– Use of Resources
	302-1	Energy consumption within the organisation	Appendix I
	302-3	Energy intensity	Appendix I
GRI 305: Emissions 2016			
GRI 3: Material Topics 2021	3-3	Management of material topics	5. SUSTAINABLE CARBON MANAGEMENT– Emissions Management and Reducing Carbon Footprint
	305-1	Direct (Scope 1) GHG emissions	Appendix I
	305-2	Energy indirect (Scope 2) GHG emissions	Appendix I
	305-3	Other indirect (Scope 3) GHG emissions	Appendix I
	305-4	GHG emissions intensity	Appendix I
	305-5	Reduction of GHG emissions	5. SUSTAINABLE CARBON MANAGEMENT – Responding to Climate Change

GRI Standard	Disclosure		Location/Explanation
GRI 306: Waste 2020			
GRI 3: Material Topics 2021	3-3	Management of material topics	5. SUSTAINABLE CARBON MANAGEMENT– Waste Management
	306-3	Waste generated	Appendix I
	306-4	Waste diverted from disposal	Appendix I
GRI 401: Employment 2016			
GRI 3: Material Topics 2021	3-3	Management of material topics	6. PEOPLE-CENTRIC – Building Diversified Teams, Hiring and Retaining the Right People
	401-1	New employee hires and employee turnover	Appendix I
GRI 403: Occupational Health and Safety 2018			
GRI 3: Material Topics 2021	3-3	Management of material topics	6. PEOPLE-CENTRIC - Promoting Employee Well-being, 6. PEOPLE-CENTRIC – Health and Workplace Safety
	403-1	Occupational health and safety management system	6. PEOPLE-CENTRIC – Health and Workplace Safety
	403-3	Occupational health services	6. PEOPLE-CENTRIC – Health and Workplace Safety
	403-5	Worker training on occupational health and safety	6. PEOPLE-CENTRIC – Health and Workplace Safety
	403-6	Promotion of worker health	6. PEOPLE-CENTRIC – Health and Workplace Safety
	403-9	Work-related injuries	Appendix I
GRI 404: Training and Education 2016			
GRI 3: Material Topics 2021	3-3	Management of material topics	6. PEOPLE-CENTRIC – Learning and Development
	404-1	Average hours of training per year per employee	Appendix I

GRI Standard	Disclosure		Location/Explanation
GRI 405: Diversity and Equal Opportunity 2016			
GRI 3: Material Topics 2021	3-3	Management of material topics	6. PEOPLE-CENTRIC – Promoting Diversity, Equity and Inclusion
	405-1	Diversity of governance bodies and employees	Appendix I
GRI 406: Non-discrimination 2016			
GRI 3: Material Topics 2021	3-3	Management of material topics	6. PEOPLE-CENTRIC – Promoting Diversity, Equity and Inclusion
	406-1	Incidents of discrimination and corrective actions taken	Appendix I
GRI 418: Customer Privacy 2016			
GRI 3: Material Topics 2021	3-3	Management of material topics	7. EFFECTIVE GOVERNANCE & OPERATIONAL EXCELLENCE – Cybersecurity and Data Protection
	418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	Appendix I

## APPENDIX IV: TCFD CONTENT INDEX

TCFD's core element	Disclosure	Section of the Report
<b>Governance</b>	(a) Describe the board's oversight of climate-related risks and opportunities	3. CHIEF EXECUTIVE OFFICER'S STATEMENT and 4. APPROACH – ESG Governance
	(b) Describe management's role in assessing and managing climate-related risks and opportunities	4. APPROACH – ESG Governance and 5. SUSTAINABLE CARBON MANAGEMENT – Responding to Climate Change
<b>Strategy</b>	(a) Describe the climate-related risks and opportunities the organisations have identified over the short-, medium-, and long-term	5. SUSTAINABLE CARBON MANAGEMENT – Responding to Climate Change
	(b) Describe the impact of climate-related risks and opportunities on the organisations' businesses, strategy, and financial planning	4. APPROACH – ESG Strategy and 5. SUSTAINABLE CARBON MANAGEMENT – Responding to Climate Change
	(c) Describe the resilience of the organisations' strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario	5. SUSTAINABLE CARBON MANAGEMENT – Responding to Climate Change
<b>Risk Management</b>	(a) Describe the organisations' processes for identifying and assessing climate-related risks	5. SUSTAINABLE CARBON MANAGEMENT – Responding to Climate Change
	(b) Describe the organisations' processes for managing climate-related risks	5. SUSTAINABLE CARBON MANAGEMENT – Responding to Climate Change and 7. EFFECTIVE GOVERNANCE & OPERATIONAL EXCELLENCE – Risk Management
	(c) Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organisations' overall risk management	5. SUSTAINABLE CARBON MANAGEMENT – Responding to Climate Change and 7. EFFECTIVE GOVERNANCE & OPERATIONAL EXCELLENCE – Risk Management



TCFD's core element	Disclosure		Section of the Report
<b>Metrics and Targets</b>	(a)	Describe the metrics used by the organisations to assess climate-related risks and opportunities in line with its strategy and risk management process	5. SUSTAINABLE CARBON MANAGEMENT – Responding to Climate Change and Appendix I
	(b)	Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks	5. SUSTAINABLE CARBON MANAGEMENT – Responding to Climate Change, 5. SUSTAINABLE CARBON MANAGEMENT – Emissions Management and Reducing Carbon Footprint and Appendix I
	(c)	Describe the targets used by the organisations to manage climate-related risks and opportunities and performance against targets	5. SUSTAINABLE CARBON MANAGEMENT – Responding to Climate Change

## APPENDIX V: SDGs CONTENT INDEX

SDGs	Relevant Target(s)	Area of Focus	Section of the Report
 <b>3</b> GOOD HEALTH AND WELL-BEING	3.8 Achieve universal health coverage	<ul style="list-style-type: none"> <li>• Health and safety policy</li> <li>• Health and well-being workshops</li> </ul>	6. PEOPLE-CENTRIC – Health and Workplace Safety
 <b>4</b> QUALITY EDUCATION	4.4 Substantially increase the number of youth and adults who have relevant skills, including technical and vocational skills, for employment, decent jobs and entrepreneurship	<ul style="list-style-type: none"> <li>• On-boarding programme</li> <li>• Comprehensive annual training for employees</li> <li>• Technical skills training sponsorship</li> </ul>	6. PEOPLE-CENTRIC – Learning and Development and Appendix I
 <b>5</b> GENDER EQUALITY	5.1 End all forms of discrimination against all women and girls	<ul style="list-style-type: none"> <li>• Comprehensive HR policies</li> <li>• Promotion of gender-inclusive language in workplace</li> </ul>	6. PEOPLE-CENTRIC – Promoting Diversity, Equity and Inclusion and Appendix I
 <b>7</b> AFFORDABLE AND CLEAN ENERGY	7.2 Increase substantially in the share of renewable energy in the global energy mix	<ul style="list-style-type: none"> <li>• Purchase carbon credits on solar renewable power project</li> <li>• ESG-related blockchain company investment</li> </ul>	5. SUSTAINABLE CARBON MANAGEMENT – Responding to Climate Change
 <b>8</b> DECENT WORK AND ECONOMIC GROWTH	8.4 Improve global resources efficiency in consumption and endeavor to decouple economic growth from environmental degradation  8.8 Protect labour rights and promote safe and secure working environments for all workers	<ul style="list-style-type: none"> <li>• Emission management and resources efficiency strategy</li> <li>• Health and safety policy</li> </ul>	5. SUSTAINABLE CARBON MANAGEMENT, 6. PEOPLE-CENTRIC – Health and Workplace Safety and Appendix I

SDGs	Relevant Target(s)	Area of Focus	Section of the Report
 <b>10</b> REDUCED INEQUALITIES	10.3 Ensure equal opportunity and reduce inequalities of outcome, including by eliminating discriminatory laws, policies and practices and promoting appropriate legislation, policies and action in this regard	<ul style="list-style-type: none"> <li>Comprehensive HR policies</li> <li>Equal opportunity policy</li> <li>Commitment to human rights</li> </ul>	6. PEOPLE-CENTRIC – Promoting Diversity, Equity and Inclusion
 <b>11</b> SUSTAINABLE CITIES AND COMMUNITIES	11.6 Reduce the adverse per capita environmental impact of cities, including by paying special attention to air quality and municipal and other waste management	<ul style="list-style-type: none"> <li>Emission management and resources efficiency strategy</li> </ul>	5. SUSTAINABLE CARBON MANAGEMENT
 <b>12</b> RESPONSIBLE CONSUMPTION AND PRODUCTION	12.7 Promote public procurement practices that are sustainable, in accordance with national policies and priorities	<ul style="list-style-type: none"> <li>Procurement policy and vendor's Code of Conduct</li> </ul>	7. EFFECTIVE GOVERNANCE & OPERATIONAL EXCELLENCE – Supply Chain Management
 <b>13</b> CLIMATE ACTION	13.2 Integrate climate change measures into policies, strategies and planning	<ul style="list-style-type: none"> <li>Reach net-zero emissions with near- and long-term emission reduction target setting</li> <li>Purchase carbon credits on solar renewable power project</li> <li>ESG-related blockchain company investment</li> <li>Achieve "carbon negative"</li> </ul>	4. APPROACH – ESG Strategy and 5. SUSTAINABLE CARBON MANAGEMENT – Responding to Climate Change
 <b>16</b> PEACE, JUSTICE AND STRONG INSTITUTIONS	16.5 Substantially reduce corruption and bribery in all their forms	<ul style="list-style-type: none"> <li>Employee's Code of Conduct</li> <li>Anti – corruption and anti-bribery management framework</li> <li>Regular business ethics training for directors and employees</li> <li>Whistleblowing policy</li> </ul>	7. EFFECTIVE GOVERNANCE & OPERATIONAL EXCELLENCE – Corporate Governance and Business Ethics