

# C-LINK SQUARED LIMITED

(Incorporated in the Cayman Islands with limited liability)  
(於開曼群島註冊成立的有限公司)

Stock code 股份代號 : 1463



## ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

2024 環境、社會及管治報告



# ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

## INTRODUCTION

C-Link Squared Limited (the “**Company**”) and its subsidiaries (collectively, the “**Group**” or “**we**”) are principally engaged in (i) the provision of outsourced document management services and related software applications and enterprise software solutions services in Malaysia; (ii) the provision of outsourced insurance risk analysis services and insurance marketing services in the People’s Republic of China (the “**PRC**”, which for the purposes of this report only, excludes Hong Kong, Taiwan and Macau, unless otherwise specified); (iii) the distribution and sales of medical equipment and pharmaceutical products in the PRC; and (iv) the provision of internet hospital and brick-and-mortar clinical services in the PRC during the year ended 31 December 2024 (the “**Reporting Period**” or “**FY2024**”).

This Environmental, Social and Governance Report (the “**ESG Report**”) summarises the environmental, social and governance (“**ESG**”) initiatives, plans and performances of the Group for FY2024 and demonstrates its commitment to sustainable development. Except for the provisions that the Group considers inapplicable to its operations, for which explanations are provided in the corresponding section, this ESG Report complies with all mandatory disclosure requirements and the “comply or explain” provisions set out in the Environmental, Social and Governance Reporting Guide (the “**ESG Reporting Guide**”).

## BOARD STATEMENT

The board (the “**Board**”) of directors (the “**Directors**”) is pleased to present the ESG Report of the Group, which reviewed the Group’s ESG initiatives, plans, performance, as well as its sustainable development with respect to environmental protection, labour practices, business operations, supply chain management, and other issues. As a responsible corporation, the Group views ESG commitments as part of its responsibilities and is committed to incorporating ESG considerations into its decision-making process.

## THE ESG GOVERNANCE STRUCTURE

The Group has developed a governance structure to ensure the alignment of ESG governance with its strategic growth, while advocating ESG integration into its business operations.

The Board holds the overall responsibility for the Group’s ESG strategies, management approach and reporting. To better manage the Group’s ESG-related issues, the Board holds at least one meeting or passes at least one written resolution annually to examine and approve the ESG-related targets, priorities, policies and frameworks, as well as reviews the progress towards their implementation and achievement, with the assistance of the designated personnel from various functional departments. With its requisite ESG-related expertise and experience, the Board is also accountable for ensuring the effectiveness of ESG risk management and internal control mechanism through a periodical review against ESG-related issues.

The Group has delegated designated personnel from various functional departments and appointed ESG consultants with relevant ESG knowledge, to facilitate the Board’s oversight of ESG issues. With the assistance of the external ESG consultants, the designated personnel are responsible for collecting and analysing the relevant ESG information, as well as planning and implementing ESG-related policies, guidelines and measures. The designated personnel from various functional departments also identify, evaluate and prioritise material ESG issues through materiality assessment, which are further reviewed, analysed and endorsed by the Board for report disclosure. In addition, the designated personnel arrange an annual meeting to discuss ESG-related matters when necessary, and report at least once annually to the Board for the evaluation, analysis and subsequent implementation or revision of the Group’s ESG strategies and management approach, and to ensure appropriate risk management on ESG issues.

## REPORTING SCOPE

The Board and the designated personnel from various functional departments of the Group identify the reporting scope by considering the materiality principle, its core business and its main revenue sources. The scope of the ESG Report comprises the operations of document management services and related software applications and enterprise software solutions services, insurance risk analysis and marketing services, the distribution and sales of medical equipment and pharmaceutical products, as well as internet hospital and brick-and-mortar clinical services. These services form the core business and revenue sources of the Group and cover its operations in Malaysia, the PRC and Hong Kong where the Group's business substantially operates, unless otherwise specified. Since the environmental impact of the business operation in Hong Kong is immaterial, its environmental data will be excluded from the reporting scope. Compared to the year ended 31 December 2023 ("**FY2023**"), the reporting scope for FY2024 has been expanded due to the Group's business growth, which includes the new office established in the PRC for the provision of internet hospital and brick-and-mortar clinical services.

The ESG key performance indicators ("**KPIs**") data were gathered and analysed from companies and subsidiaries that are under the Group's direct operational control. The Group will continue to assess the major KPIs of different businesses and extend the scope of disclosures when and where applicable.

## REPORTING STANDARD

The ESG Report has been prepared in accordance with the ESG Reporting Guide as set out in Appendix C2 to the Rules Governing the Listing of Securities on The Stock Exchange of Hong Kong Limited (the "**Stock Exchange**").

Information relating to the Group's corporate governance practices can be found in the Corporate Governance Report of the Group's annual report for FY2024.

The Group attaches great importance to the reporting principles of materiality, quantitative, and consistency outlined in the ESG Reporting Guide during the preparation for the ESG Report. The Group has applied these reporting principles in the ESG Report, as described below:

Materiality: Materiality assessment was conducted to identify material ESG issues during the Reporting Period, thereby adopting the confirmed material issues as the focus of the ESG Report. The materiality of ESG issues was reviewed and confirmed by the Board and the designated personnel from various functional departments. Please refer to the sections headed "STAKEHOLDER ENGAGEMENT" and "MATERIALITY ASSESSMENT" of this ESG Report for further details.

Quantitative: This ESG Report discloses KPIs and environmental targets in a quantitative manner. Information regarding the standards, methodologies, assumptions, calculation references, and sources of key conversion factors used for KPIs is stated wherever appropriate.

Consistency: The statistical methodologies applied to the ESG Report were substantially consistent with those utilised in FY2023 for meaningful comparison. If there are any changes that may affect comparison with previous reports, the Group will make explanatory notes to the corresponding section hereof.

The Group has established internal controls and a formal review process to ensure that any information presented in this ESG Report is as accurate and reliable as possible. This ESG Report has been approved by the Board.

## REPORTING PERIOD

The ESG Report describes the ESG initiatives, plans and performance of the Group for FY2024.

## STAKEHOLDER ENGAGEMENT

The Group understands that the success of the Group's business depends on the support from its key stakeholders. The Group actively engages with its stakeholders to develop mutually beneficial relationships, to seek their views on its business proposals and initiatives, as well as to promote sustainability in the marketplace, workplace, community and environment. The Group has identified key stakeholders that are important to its business and established various channels for communication. Through communication with various stakeholders, the Group understands their expectations and concerns, which in turn help the Group to make decisions, and assess and manage the ESG issues. The Group will continue to increase the involvement of stakeholders via constructive communication in order to achieve long-term prosperity.

Stakeholders' expectations have been taken into consideration by utilising diversified engagement methods and communication channels as shown below:

Stakeholders	Communication channels	Expectations
Shareholders and investors	<ul style="list-style-type: none"> <li>General meetings</li> <li>Financial reports</li> <li>Announcements and circulars</li> <li>The Group's website</li> </ul>	<ul style="list-style-type: none"> <li>Sustainable profitability</li> <li>Good corporate governance structure</li> <li>Shareholder return</li> <li>Business strategies and performance</li> </ul>
Employees	<ul style="list-style-type: none"> <li>Training activities, seminars and briefings</li> <li>Internal emails</li> <li>Performance appraisal</li> </ul>	<ul style="list-style-type: none"> <li>Remuneration and benefits</li> <li>Safe working environment</li> <li>Career development</li> </ul>
Suppliers	<ul style="list-style-type: none"> <li>Business meetings and discussions</li> </ul>	<ul style="list-style-type: none"> <li>Fair and open procurement</li> <li>On-time payment</li> <li>Sustainable relationship</li> </ul>
Customers	<ul style="list-style-type: none"> <li>Customer service hotline</li> <li>Emails</li> <li>Customer meetings</li> <li>Site visits</li> </ul>	<ul style="list-style-type: none"> <li>Possession of technical capability</li> <li>Ability to provide accurate and efficient processing</li> <li>Flexibility of customising software to meet specific needs</li> <li>Privacy protection</li> </ul>
Government and other regulatory authorities	<ul style="list-style-type: none"> <li>Written or electronic correspondence</li> <li>Visits and inspections</li> </ul>	<ul style="list-style-type: none"> <li>Legal compliance</li> <li>Stability in business operations</li> </ul>
Media and the public	<ul style="list-style-type: none"> <li>ESG reports</li> <li>The Group's website</li> <li>Financial reports</li> <li>Announcements and circulars</li> </ul>	<ul style="list-style-type: none"> <li>Transparency of ESG issues and financial disclosure</li> <li>Legal compliance</li> <li>Corporate governance</li> </ul>

The Group understands the importance of maintaining good relationships with its stakeholders and actively collaborates with them to ensure that their opinions on the Group's ESG-related risks, opportunities, and performance can be voiced out through effective communication channels. In the long run, stakeholders' contributions will aid the Group in understanding the ESG trend from their perspectives, improving potentially overlooked ESG performance and maintaining the success of the Group's business in the challenging market.



## MATERIALITY ASSESSMENT

With the assistance of the designated personnel from various functional departments, the Group identified the following list of material ESG issues for the Group, based on its business, the ESG Reporting Guide, and industry standard. To prioritise the identified material ESG issues, the Group conducted a materiality assessment survey regularly. Management and employees of different business units and departments in offices of different locations were invited to evaluate the significance of the identified ESG issues to the stakeholders and the Group's business.

A summary of the Group's material ESG issues according to its relative importance as assessed by the Group is shown as follows:

Least material	Material	Most material
<ul style="list-style-type: none"><li>• Air Emissions</li><li>• Greenhouse Gas ("GHG") Emissions</li><li>• Waste Management</li><li>• Energy Management</li><li>• Water Management</li><li>• Climate Change</li></ul>	<ul style="list-style-type: none"><li>• Employment Practices</li><li>• Employee Training and Development</li><li>• Supply Chain Management</li><li>• Intellectual Property ("IP") Rights</li><li>• Community Engagement and Investment</li></ul>	<ul style="list-style-type: none"><li>• Occupational Health and Safety</li><li>• Customer Privacy Protection</li><li>• Quality Services</li><li>• Customer Engagement and Satisfaction</li><li>• Business Ethics</li></ul>

The identification and prioritisation of material ESG issues enable the Group to formulate relevant strategies in its development and guide the Group to attain sustainability targets to meet the expectations of the Group's stakeholders.

For FY2024, the Group confirmed that it has established appropriate and effective management policies and internal control systems for ESG issues and confirmed that the disclosed contents comply with the requirements of the ESG Reporting Guide.

## CONTACT US

The Group welcomes stakeholders to provide their opinions and suggestions. You can provide valuable advice in respect of the ESG Report and/or the Group's performance in sustainable development by visiting: <https://www.clinksquared.com> or contacting us via email at [investor\\_relations@cgroup.com.my](mailto:investor_relations@cgroup.com.my).

## A. ENVIRONMENTAL

### A1. Emissions

Environmental protection and sustainable development rely on concerted and continuous efforts from all industries and society. In addition to complying with applicable laws and regulations, the Group is committed to minimising any adverse impacts on the environment by incorporating green practices in its daily operations with the implementation of Environmental Policy. The Group endeavours to expand its business without exploiting the environment. Therefore, the Group regularly reviews its existing policies to mitigate potential direct and indirect negative environmental impacts arising from its business operations. In addition, the Group has set environmental targets in regard to GHG emissions, waste management, energy management and water management to enhance decarbonisation and address stakeholders' concern.

During the Reporting Period, the Group was not aware of any material non-compliance with laws and regulations relating to air and GHG emissions, discharges into water and land, and generation of hazardous and non-hazardous waste that would have a significant impact on the Group, including but not limited to the Environmental Quality Act 1974 of Malaysia, and the Environmental Protection Law of the People's Republic of China, the Law of the People's Republic of China on the Prevention and Control of Atmospheric Pollution, and the Water Pollution Prevention and Control Law of the People's Republic of China, and the Law of the People's Republic of China on the Prevention and Control of Environmental Pollution by Solid Waste of the PRC.

### Air Emissions

The principal sources of air emissions arising out of the Group's operation were petrol and diesel consumed by vehicles. In response to the above sources, the Group has actively taken measures to manage the air emissions during its operation. Such measures are described in the section headed "GHG Emissions".

The summary of exhaust gas emissions performance is as follows:

Types of air	Unit	FY2024	FY2023
Nitrogen oxides ("NO <sub>x</sub> ")	kg	92.57	98.19
Sulphur oxides ("SO <sub>x</sub> ")	kg	0.23	0.24
Particulate matter ("PM")	kg	8.78	9.31

### GHG Emissions

The principal GHG emissions of the Group were generated from petrol and diesel consumption by vehicles (Scope 1), purchased electricity (Scope 2) and business air travel (Scope 3). To reduce the Group's GHG emissions, the Group has set a target in the year ended 31 December 2021 ("FY2021") to gradually reduce the total GHG emissions intensity (tCO<sub>2</sub>e<sup>1</sup>/million revenue (RM)) by the year ending 31 December 2025 ("FY2025"), using FY2021 as the baseline year (which was approximately 4.91 tCO<sub>2</sub>e/million revenue (RM)). To achieve this target, the Group has adopted the following measures:

#### Scope 1 – Direct GHG Emissions

The Group has adopted the following measures to mitigate direct GHG emissions from petrol and diesel consumed by vehicles in its operations:

- Plan routes ahead of time to avoid route repetition and optimise fuel consumption;
- Regularly maintain vehicles to ensure optimal engine performance and fuel use; and
- Switch off the engine when the vehicle is idling.

#### Scope 2 – Indirect GHG Emissions

Electricity consumption accounted for a large percentage of GHG emissions of the Group. The Group has implemented measures to reduce energy consumption, details of measures are set out in the section headed "Use of Resources" under Aspect A2.

### Scope 3 – Other Indirect GHG Emissions

Business air travel contributed to the category of other indirect GHG emissions. Realising that business air travel generates a large amount of GHG emissions, the Group only utilises business air travel when deemed necessary. Teleconferences and web conferences are the Group's preferred communication channels.

During the Reporting Period, the Group's total GHG emissions increased compared to FY2023, primarily due to extended operating hours in Malaysia to fulfil urgent orders and the establishment of a new office in the PRC. However, the Group's total GHG emissions intensity (tCO<sub>2</sub>e/million revenue) decreased compared to FY2023. The Group is currently in the process of achieving its aforementioned target, and will continue to implement relevant GHG emissions reduction initiatives in the future.

The summary of GHG emissions performances is as follows:

Indicators <sup>2</sup>	Unit <sup>1</sup>	FY2024	FY2023
Scope 1 – Direct GHG emissions			
• Petrol and diesel consumption	tCO <sub>2</sub> e	39.75	41.61
Scope 2 – Energy Indirect GHG emissions			
• Purchased electricity <sup>3</sup>	tCO <sub>2</sub> e	485.31	469.52
Scope 3 – Other Indirect GHG Emissions			
• Business air travel	tCO <sub>2</sub> e	–	0.08
<b>Total GHG emissions</b>	<b>tCO<sub>2</sub>e</b>	<b>525.06</b>	<b>511.21</b>
<b>Intensity<sup>4</sup></b>	<b>tCO<sub>2</sub>e/million revenue (RM)</b>	<b>5.41</b>	<b>5.45</b>
	<b>tCO<sub>2</sub>e/employee</b>	<b>2.75</b>	<b>3.10</b>

Note(s):

1. tCO<sub>2</sub>e is defined as tonnes of carbon dioxide equivalent.
2. GHG emissions data is presented in terms of carbon dioxide equivalent and is based on, but not limited to, "The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard" issued by the World Resources Institute and the World Business Council for Sustainable Development, "How to prepare an ESG Report – Appendix 2: Reporting Guidance on Environmental KPIs" issued by the Stock Exchange, the "Sixth Assessment Report" published by the Intergovernmental Panel on Climate Change, the Sustainability Report 2023 issued by Tenaga Nasional Berhad and the "Notice on the Release of the 2022 Greenhouse Gas Emissions Factor for Electricity" issued by the Ministry of Ecology and Environment of the PRC.
3. Since the electricity bill for one of our offices in the PRC is included in the management fee, detailed electricity consumption data for that office is not available.
4. During the Reporting Period, the Group's revenue is approximately RM96,990,000 (FY2023: approximately RM93,763,000). The Group had 191 employees (including the Directors) as at 31 December 2024 (as at 31 December 2023: 165 employees). Unless otherwise specified, the data is also used for calculating other intensity data.



### Sewage Discharge into Water and Land

Due to the Group's business nature, there was no significant or unreasonable amount of sewage discharged by the Group into either land or water during the Reporting Period.

### Waste Management

#### Hazardous Waste Management

Due to the Group's provision of outsourced document print and mail fulfilment services in Malaysia, the use and the subsequent disposal of toner cartridges are inevitable. Therefore, the principal hazardous waste generated by the Group's operations included toner cartridges. The Group arranges collection of toner cartridges with a qualified waste collector for proper disposal. The Group also arranges collection with contracted third parties to lawfully dispose of computers and other waste electrical and electronic equipment, should they become obsolete. The Group remains vigilant to the management of proper hazardous waste disposal and has set a target to ensure that all of its hazardous waste is disposed of in full compliance with applicable statutory standards in the coming years. During the Reporting Period, all hazardous wastes generated by the Group were lawfully disposed of by contracted third parties.

During the Reporting Period, the Group's total hazardous waste generation intensity (tonnes/employee) decreased compared to FY2023, primarily due to reduced toner usage influenced by project schedules.

The summary of major hazardous waste generation performance is as follows:

Indicators	Unit	FY2024	FY2023
Toner cartridge <sup>5</sup>	tonnes	4.18	4.20
<b>Total hazardous waste generated</b>	<b>tonnes</b>	<b>4.18</b>	<b>4.20</b>
<b>Intensity</b>	<b>tonnes/million revenue (RM)</b>	<b>0.04</b>	<b>0.04</b>
	<b>tonnes/employee</b>	<b>0.02</b>	<b>0.03</b>

Note(s):

5. This data includes operations in Malaysia only. Since the Group's subsidiary in the PRC is not principally engaged in outsourced document print and mail fulfilment services, only an insignificant amount of toner cartridges was generated from its operations.

#### Non-hazardous Waste Management

The principal non-hazardous waste generated by the Group was general waste from its offices. During the Reporting Period, the Group did not note a disproportional amount of waste produced.

The Group places great effort in raising the awareness of its employees on the importance of reducing waste production. The Group maximises its efforts in reducing the amount of waste being disposed of at the landfills by establishing the Environmental Policy.

Committed to further reducing waste generation, the Group has set a target in FY2021 to gradually reduce the total non-hazardous waste generation intensity (tonnes/employee) by FY2025, using FY2021 as the baseline year (which was approximately 0.05 tonnes/employee). To achieve this target, the Group has adopted the following environmentally friendly initiatives to enhance its environmental performance. Such green measures include but are not limited to:

- Reduce the use of single-use disposable items;
- Encourage the Group's employee to avoid unnecessary printing;
- Promote paperless office by using electronic equipment and office automation system;
- Reuse and recycle paper products and boxes; and
- Recycle non-hazardous office and electronic equipment after their life cycle where possible.

During the Reporting Period, the Group's total non-hazardous waste generation intensity (tonnes/employee) has remained the same compared to FY2023. The Group is thus on track to accomplish its aforementioned target.

The summary of non-hazardous waste generation performance is as follows:

Indicators	Unit	FY2024	FY2023
General waste <sup>6</sup>	tonnes	9.00	8.50
<b>Total non-hazardous waste generated</b>	<b>tonnes</b>	<b>9.00</b>	<b>8.50</b>
<b>Intensity</b>	<b>tonnes/million revenue (RM)</b>	<b>0.09</b>	<b>0.09</b>
	<b>tonnes/employee</b>	<b>0.05</b>	<b>0.05</b>

Note(s):

6. This data includes operations in Malaysia only. An insignificant amount of general waste is generated from the Group's PRC operations as the Group's office size in the PRC is relatively small compared to its headquarters in Malaysia.

## A2. Use of Resources

The Group upholds and promotes the principle of effective use of resources, and is committed to optimising its use of resources in all of its business operations. The Group has established relevant policies and procedures governing the use of energy and water with the aim of achieving higher efficiency and reducing the unnecessary use of resources.

### Energy Management

The energy consumed by the Group was mainly petrol and diesel for vehicles as well as electricity for daily operations. To better utilise finite natural resources, the Group has established the Environmental Policy to better govern the use of energy. To raise employees' awareness of energy-saving, the Group is committed to organising annual activities to promote energy conservation. The Group will also monitor the level of electricity consumption. If there is an unreasonable increase in electricity consumption, the Group will investigate and take corrective measures. Meanwhile, the Group has set a target in FY2021 to gradually reduce the total energy consumption intensity (MWh/million revenue (RM)) by FY2025, using FY2021 as the baseline year (which was approximately 9.81 MWh/million revenue (RM)). To achieve this target, the Group has adopted the following energy-saving measures:

- Install energy-efficient lighting;
- Ensure all idle appliances and unnecessary lightings are switched off either manually or through automatic sensors; and
- Conduct regular maintenance on air-cooling technologies and optimal timing controls.

During the Reporting Period, the Group's total energy consumption increased compared to FY2023, primarily due to extended operating hours in Malaysia to fulfil urgent orders and the establishment of a new office in the PRC. However, the Group's total energy consumption intensity (MWh/million revenue) decreased compared to FY2023. The Group is currently in the process of achieving its aforementioned target, and will continue to implement energy-saving initiatives in the future.

The summary of energy consumption performance is as follows:

Indicators	Unit	FY2024	FY2023
<b>Direct energy consumption</b>	<b>MWh</b>	<b>152.98</b>	<b>159.58</b>
• Petrol <sup>7</sup>	MWh	21.59	30.39
• Diesel <sup>7</sup>	MWh	131.39	129.19
<b>Indirect energy consumption</b>	<b>MWh</b>	<b>880.57</b>	<b>853.68</b>
• Purchased electricity <sup>3</sup>	MWh	880.57	853.68
<b>Total energy consumption</b>	<b>MWh</b>	<b>1,033.55</b>	<b>1,013.26</b>
<b>Intensity</b>	<b>MWh/million revenue (RM)</b>	<b>10.66</b>	<b>10.81</b>
	<b>MWh/employee</b>	<b>5.41</b>	<b>6.14</b>

Note(s):

7. The calculation of unit conversion refers to the "Energy Statistics Manual" issued by the International Energy Agency.



## Water Management

Water was mainly consumed for domestic usage in the office during the Group's operation. The Group has always prioritised the efficient use of water resources and formulated relevant policies to regulate the Group's water consumption. To reduce the Group's water consumption, the Group has set a target in FY2021 to gradually reduce the total water consumption intensity (m<sup>3</sup>/employee) by FY2025, using FY2021 as the baseline year (which was approximately 29.74 m<sup>3</sup>/employee). To achieve this target, the Group actively promotes the importance of water conservation to its employees and has adopted various water-saving measures, including posting eye-catching reminders around washrooms and offices, regularly inspecting water taps to prevent leakage and installing dual flush water cisterns in toilets and water-saving thimbles in sinks where possible.

During the Reporting Period, the Group's total water consumption intensity (m<sup>3</sup>/employee) increased compared to FY2023, primarily due to extended operations, the need for more frequent cleaning and the establishment of a new office in the PRC. The Group is currently in the process of achieving its aforementioned target, and will continue to implement water-saving initiatives in the future.

Due to the Group's business nature and its geographical location, the Group did not encounter any problem in sourcing water that was fit for purpose during the Reporting Period.

The summary of water consumption performances is as follows:

Indicators	Unit	FY2024	FY2023
<b>Total water consumption<sup>8</sup></b>	<b>m<sup>3</sup></b>	<b>6,179.00</b>	<b>4,718.00</b>
<b>Intensity</b>	<b>m<sup>3</sup>/million revenue (RM)</b>	<b>63.71</b>	<b>50.32</b>
	<b>m<sup>3</sup>/employee</b>	<b>32.35</b>	<b>28.59</b>

Note(s):

8. Since the water bill for one of our offices in the PRC is included in the management fee, detailed water consumption data for that office is not available.

## Paper Consumption

As an outsourced document management services provider, the Group inevitably uses a substantial amount of paper for the printing of documents such as leaflets, letters, envelopes and documentations for its customers for various purposes, including marketing purposes and record keeping.

The Group nevertheless upholds its commitment to environmental sustainability and adopts other sustainable printing options internally. Examples include:

- Use recycled paper instead of virgin paper when possible;
- Reuse single-sided waste paper;
- Procure paper products with the Forest Stewardship Council Recycled Label when possible; and
- Adopt double-sided printing when possible.

The Group's provision of electronic document delivery services and enterprise software solution services aid enterprises in reducing paper consumption as documents can be transferred in electronic means and/or processed and stored online. This not only lowers the need for storage space but also reduces carbon emissions and the excessive use of paper products. The Group has also strengthened its marketing approach to promote its digital solutions to its customers. The Group believes that its document management services will bring a positive impact to the environment and will reduce the reliance of enterprises on paper products in the long run.

The summary of paper consumption performances is as follows:

Indicators	Unit (in thousand)	FY2024	FY2023
A4 Paper	sheet	51,927.54	54,833.55
B5 Paper	sheet	6,313.00	11,826.00
Envelope	piece	12,370.00	25,860.35

#### Use of Packaging Materials

Due to the Group's business nature, the use of packaging material was not considered to be a material ESG aspect to the Group.

### A3. The Environment and Natural Resources

The Group realises its responsibility to minimise any negative environmental impacts in its business operations despite the fact that the Group does not produce harmful pollutants that directly affect the environment, nor do its business operations have a significant impact on natural resources. The Group nevertheless remains conscious of its existing and potential impacts, and therefore regularly assesses the environmental risks of its business model, adopts preventive measures and relevant policies, and ensures compliance with relevant laws and regulations. Details can be found in the sections headed "Emissions" under Aspect A1 and "Use of Resources" under Aspect A2.

#### Indoor Air Quality

The Group considers that providing a pleasant and safe working environment to its employees is of paramount importance. Indoor air quality is therefore regularly monitored and measured. To maintain indoor air quality at a satisfactory level, air purifying equipment is placed in the Group's premises and the ventilation system is cleaned periodically. By adopting these measures, the indoor air quality of the Group's premises has been satisfactory.

## A4. Climate Change

The Group recognises the importance of the identification and mitigation of significant climate-related issues. Therefore, the Group is committed to managing the potential climate-related risks and opportunities which may impact the Group's business activities. The Group has implemented relevant policies to identify and mitigate different climate-related risks while also seizing potential opportunities, as mentioned in the sections headed "Emissions" under Aspect A1 and "Use of Resources" under Aspect A2. Additionally, the Group has incorporated climate change considerations into its internal control procedures and performed a climate change assessment to identify and mitigate the potential risks and opportunities that may arise from its business operations. The result of the assessment will be reviewed regularly. Climate-related risks faced by the Group mainly stem from the following dimensions:

### Climate-related Issues

#### Physical Risks

Increased frequency and severity of extreme weather events such as typhoons, storms, and floods caused by heavy rains may adversely affect the economy, infrastructure and livelihood of the people in the regions where the Group conducts its business. Severe weather events may also result in injuries, destruction of assets and disruption of its business operation due to power shortages or power failures, thereby affecting its revenue and increasing operational costs. In response, the Group identifies these risks and prioritises those with severe impact to take precautionary measures. Concurrently, the Group explores the ways in which a change in business model is possible to mitigate or avoid these severe impacts on business operations.

Further, the supply of raw materials and logistics might be disrupted under extreme weather events. The Group may not have sufficient materials to meet its orders which may affect the Group's ability to meet the demand of customers and therefore, this may also have an adverse effect on the Group's operations and financial performance. To avoid any material disruption to the sourcing or delivery of raw materials from its suppliers, the Group mainly procures from suppliers that are located in Malaysia. Additionally, Business Continuity Plan and Disaster Recovery Plan are also implemented to prepare the Group for the events of extreme weather.

#### Transition Risks

Attributed to the Malaysian government's commitments to achieve carbon-neutrality, it is anticipated that more stringent policies and initiatives are likely to be implemented by the government to meet the carbon emission reduction targets and net-zero ambitions. As a Malaysia-based corporation, failing to comply with applicable laws and regulations might hinder its business operations and reputation. Therefore, in response to the policy and legal risks, as well as the reputation risks, higher capital investment due to the replacement of equipment with higher energy efficiency to ensure future compliance with the regulations is expected. The Group also regularly monitors existing and emerging trends, policies and regulations relevant to climate and be prepared to alert the Board where necessary to avoid cost increments, non-compliance fines or reputational risks due to delayed response.

#### Opportunities

Recognising that the use of paper is one of the contributors of carbon footprint and the increasing customer interest in sustainable products, the Group considers developing technologies that promote paperless offices as a business opportunity. The Group's document management services can help enterprises reduce paper consumption, reduce storage needs, backup and store documents online, and further streamline the overall business process, all of which promote higher work efficiency and a reduction in carbon emissions. Therefore, the promotion of paperless offices will have a positive impact on the continued development of the Group's document management service market in future years.



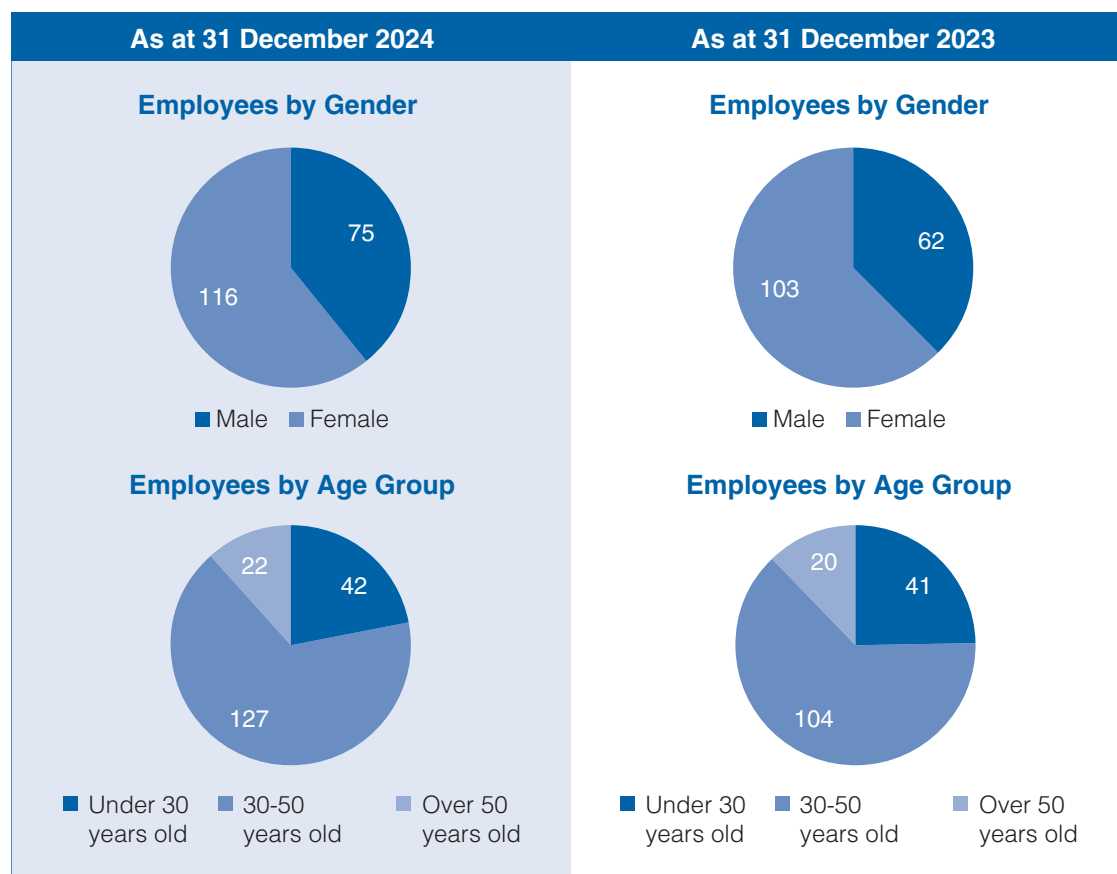
## B. SOCIAL

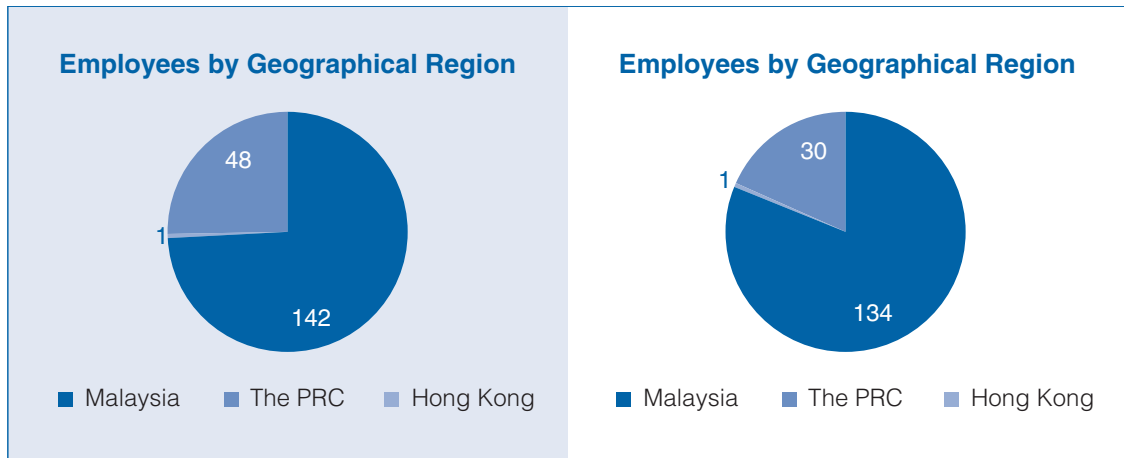
### B1. Employment

Employees are the most valuable asset of the Group and the Group's continued success relies heavily on its employees' talents and dedication. Therefore, the Group has adopted sound employment practices by establishing the comprehensive human resources ("HR") policies and procedures (the "HR Policies and Procedures") to cover every aspect of employment, including but not limited to the recruitment and management of staff, employee background checks, non-discrimination and equal opportunities, statutory obligations, compliance procedures and adherence to updated labour laws and regulations. The Group periodically reviews existing policies and employment practices to ensure the continuous improvement of its employment standards and competitiveness against service providers of the same industry.

During the Reporting Period, the Group was not aware of any material non-compliance with employment-related laws and regulations that would have a significant impact on the Group, including but not limited to the Employment Act 1955 of Malaysia, the Labour Law of the People's Republic of China and the Labour Contract Law of People's Republic of China of the PRC, and the Employment Ordinance of Hong Kong.

As at 31 December 2024, the Group had 191 employees (As at 31 December 2023: 165 employees), with 185 full-time employees, and the rest were part-time employees (As at 31 December 2023: 159 full-time employees, and the rest were part-time employees). The distribution of employees of the Group according to gender, age group and geographical region is as follows:





During the Reporting Period, the Group's overall turnover rate<sup>9</sup> was approximately 14.04 % (FY2023: approximately 16.22%). The employee turnover rate of the Group according to gender, age group and geographical region is as follows:

Turnover rate <sup>10</sup>	Unit	FY2024	FY2023
<b>By gender</b>			
Male	%	7.30	20.80
Female	%	18.26	13.46
<b>By age group</b>			
Under 30 years old	%	21.69	31.71
30-50 years old	%	12.12	9.52
Over 50 years old	%	9.52	19.51
<b>By geographical region</b>			
Malaysia	%	16.67	14.95
The PRC	%	5.13	16.67
Hong Kong	%	—	100.00

Note(s):

9. The calculation formula of overall turnover rate is shown as below:  
Overall turnover rate =  $X \div Y \times 100\%$   
X = Total number of employees leaving employment during the year  
Y = (Total number of employees at the beginning of the year + Total number of employees at the end of the year)  $\div 2$
10. The calculation formula of turnover rate by category is shown as below:  
Turnover rate by category =  $X \div Y \times 100\%$   
X = Number of employees in the specified category leaving employment during the year  
Y = (Number of employees in the specified category at the beginning of the year + Number of employees in the specified category at the end of the year)  $\div 2$

### **Recruitment, Diversity and Equal Opportunities**

Sustainable growth of the Group relies on the diversity of talents and a non-discriminatory recruitment process. The Group's employees are recruited from various sources which include the open market, online job postings, advertisements, the Group's website, walk-ins, etc., via a robust, transparent and fair recruitment process based solely on their experience and expertise, and without regard to their age, ethnicity, origin, gender identity, marital status, sexual orientation and religion.

The Group is firmly convinced that all employees should be provided with a working environment that enables them to be productive and work to the best of their abilities. Therefore, the Group is committed to creating and maintaining an inclusive and collaborative workplace culture. At the same time, the Group expects and requests the cooperation of all employees in maintaining an environment free of discrimination and harassment. In addition, the Group emphatically states its zero-tolerance stance on any form of such behaviour in the workplace.

### **Benefits and Welfare**

The Group understands that good benefits and welfare encourage retention and foster a sense of belonging. The Group offers attractive remuneration packages, including discretionary bonuses and allowances. In addition to the entitlement of leaves stipulated by relevant laws and regulations, the Group provides a variety of leaves to cater to the needs of its employees, such as emergency leave, marriage leave, compassionate leave, etc. Eligible employees are also eligible for overtime and medical claims.

### **Promotion and Performance Appraisal**

Employees are required to undergo a Performance Development Dialogue ("PDD") set up by the Group. The PDD is a 3-phase process that consists of a goal setting exercise, mid-year and year-end reviews. It is an on-going, two-way dialogue between the employees and their immediate superiors that focuses on the employees' performance and development. Performance appraisals in the form of a written evaluation will also be performed on a regular basis. The results of such appraisals are used for employees' salary review and promotion consideration.

### **Working Hours and Rest Periods**

Official working hours and rest periods are clearly stated in the Group's HR Policies and Procedures and are in accordance with relevant local employment laws.

### **Dismissal**

Unreasonable dismissal under any circumstances is strictly prohibited. Dismissal will occur only on reasonable and lawful grounds, which are clearly stated in the Group's HR Policies and Procedures and in accordance with the relevant local employment laws.



## B2. Health and Safety

### Occupational Health and Safety Management

The Group places a high priority on providing employees with a safe and healthy working environment and is committed to complying with all applicable health and safety laws and regulations. The Group's Occupational Health and Safety Policy was drafted and subsequently implemented in accordance with the local law and regulations. The said policy includes controls on identified hazards as well as procedures and guidelines on emergency evacuation to ensure the health and safety of its employees. In addition, the Group compensates employees in accordance with statutory provisions that cover employees who sustain personal injuries by accidents or diseases arising from the course of employment.

During the Reporting Period, the Group was not aware of any material non-compliance with health and safety related laws and regulations that would have a significant impact on the Group, including but not limited to the Occupational Safety and Health Act 1994 of Malaysia, the Labour Law of the People's Republic of China and the Law of the People's Republic of China on the Prevention and Control of Occupational Diseases of the PRC, and the Occupational Safety and Health Ordinance of Hong Kong. There were no work-related fatalities in the past three years including FY2024 and no lost days due to work injury were recorded during the Reporting Period (FY2023: Nil).

To identify various potential hazards in the workplace, the Group has adopted the Hazard Identification, Risk Assessment and Risk Control ("**HIRARC**") approach. The Group administers assessments adopting the HIRARC on an annual basis. The approach provides a systematic and objective method to assess and control risks, with the aim of safeguarding the health and safety of employees and mitigating potential workplace hazards. The procedures are regularly reviewed and monitored to ensure their continued effectiveness.

The Group places great emphasis on ensuring that its employees receive adequate and appropriate training regarding workplace safety procedures. Therefore, the Group holds safety awareness training for its employees and encourages them to undergo continuous safety training. Safety awareness training not only covers potential risks in the workplace to mitigate workplace accidents, but also provides a first aid guide to its employees to ensure that suitable measures can be carried out during emergencies.

## B3. Development and Training

Training and continuous development are essential to the Group's employees to keep abreast of the ever-changing trends of the industry and also to satisfy its customers' evolving needs. The Group holds a firm belief that the provision of training opportunities and continuous career development to its employees strengthens their professional capabilities and growth, helps retain high-calibre talent and provides a solid foundation for the Group's continued success. At the same time, the Group also supports the sustainable growth of business and maintenance of its competitive edge in the industry.

### Provision of Training Opportunities

New employees are required to undergo an orientation to ensure that they are familiar with the Group's background and rules. On-the-job training will also be provided when necessary to reinforce employees' skills and knowledge. All employees are required to participate in the training conducted by the Group on information security awareness and safety awareness annually to ensure that they are aware of information security threats, as well as health and safety hazards within the workplace. Moreover, employees are also encouraged to attend additional training sessions that are relevant to their jobs.

The Group provides financial subsidies to selected employees for external training courses to strengthen their job-related knowledge. During the Reporting Period, the Group recorded 100% (FY2023: 100%) of trained employees<sup>11</sup>, with an average of approximately 2.71 hours (FY2023: approximately 5.21 hours) of training per employee<sup>12</sup>. The breakdown of employees trained and the average training hours by category are as follows<sup>13</sup>:

Category	FY2024		FY2023	
	Breakdown of trained employee (%) <sup>14</sup>	Average training hours (hours) <sup>15</sup>	Breakdown of trained employee (%) <sup>14</sup>	Average training hours (hours) <sup>15</sup>
<b>By gender</b>				
Male	39.27	2.60	37.58	4.68
Female	60.73	2.78	62.42	5.52
<b>By employee category</b>				
Senior management	3.66	1.43	4.24	1.71
Management	12.57	2.50	10.30	4.76
General staff	83.77	2.80	85.46	5.43

Note(s):

11. The calculation formula of percentage of trained employees is shown as below:  
Percentage of trained employees =  $X \div Y \times 100\%$   
X = Total number of trained employees for the year  
Y = Total number of employees at the end of the year
12. The calculation formula of average training hours per employee is shown as below:  
Average training hours per employee =  $X \div Y$   
X = Total number of training hours for the year  
Y = Total number of employees at the end of the year
13. All the relevant training data excluded employees who left the Group during the year.
14. The calculation formula of breakdown of trained employee by category is shown as below:  
Breakdown of trained employee by specified category =  $X \div Y \times 100\%$   
X = Number of trained employees in the specified category for the year  
Y = Total number of trained employees for the year
15. The calculation formula of average training hours by category is shown as below:  
Average training hours by specified category =  $X \div Y$   
X = Number of training hours for employees in the specified category for the year  
Y = Number of employees in the specified category at the end of the year

## **B4. Labour Standards**

### **Prevention of Child and Forced Labour**

The Group guarantees that no employee will be made to work against his/her will or be coerced to work. The recruitment of forced and child labour are strictly prohibited and all employees recruited by the Group are above the minimum working age. These rules have been listed in the HR Policies and Procedures. To prevent illegal employment of child and forced labour, personal data are collected during the recruitment process to assist the selection of suitable candidates and to verify candidates' identities. The HR department ensures that their identity documents are carefully checked. In circumstances where any individuals below the legal working age or without any identification documents are hired, corrective actions will be taken immediately to rectify the situation by terminating the employee and reporting to the relevant governmental authorities.

During the Reporting Period, the Group was not aware of any material non-compliance with child and forced labour-related laws and regulations that would have a significant impact on the Group, including but not limited to Children and Young Persons (Employment) Act 1966 of Malaysia, the Labour Law of the People's Republic of China and the Labour Contract Law of the People's Republic of China of the PRC, and the Employment Ordinance of Hong Kong.

## **B5. Supply Chain Management**

The Group recognises the importance of good supply chain management practices in mitigating environmental and social risks. In view of green supply chain management, the Group strives to engage suppliers who incorporate the consideration of environmental and social risks into their supply chain management.

### **Procurement Practices**

The Group's main purchases are paper, envelopes and postal services. Meanwhile, the Group also procures other printing materials and services, including but not limited to letterhead portrait, stationery, insurance and professional services hired to meet its post-listing obligations. To govern the procurement procedures of the above purchases, the Group has established the Procurement Policy, which outlines the procedures of selecting, managing and evaluating suppliers. During the supplier selection process, a number of factors, including but not limited to the supplier's ability to meet the Group's quality requirements, the supplier's reputation and the price of products or services, are considered. During the Reporting Period, 36 (FY2023: 29) of the Group's suppliers were engaged under the Procurement Policy. The policy is regularly reviewed to ensure its continued effectiveness.

The Group is aware of the environmental and social risks along the supply chain. In order to reduce social and environmental risks along the supply chain and to ensure suppliers are continuously meeting the Group's requirements and expectations, the Group maintains a Qualified Suppliers List which is approved and periodically reviewed by the Directors. Where possible, the Group strives not to over-rely on a particular supplier by maintaining more than one supplier for each type of products or services provided in order to ensure the stability of the supply chain. In any procurement process, quotation comparison should be performed, and a minimum of two quotations should be obtained from different suppliers. These practices are closely monitored and regularly reviewed to ensure their effectiveness.

In addition, regular assessments are performed by designated personnel to assess the suppliers' compliance with laws and regulations, reputation, quality and price of products or services provided. Corrective action plans will be carried out to remediate the identified risk in a timely manner.

Moreover, the Group pays close attention to the environmental awareness of its suppliers and promotes sound environmental governance practices amongst its business partners and suppliers. The Group encourages its business partners and suppliers to consider the risks posed to their operations from climate change and to actively mitigate their environmental impacts during supplier management meetings and events. We are committed to continuously monitoring the practices and ensuring their effectiveness.

The number of suppliers by geographical region is as follows:

Suppliers by geographical region	FY2024	FY2023
Malaysia	34	36
Hong Kong	11	15
The PRC	16	9
<b>Total number of suppliers</b>	<b>61</b>	<b>60</b>

## B6. Product Responsibility

The Group has quality and assurance procedures in place to ensure that the products and services provided are not only in compliance with relevant local laws and regulations, but are also of satisfactory quality.

During the Reporting Period, the Group was not aware of any material non-compliance with laws and regulations relating to health and safety, advertising, labelling and privacy matters relating to products and services provided, as well as methods of redress that would have a significant impact on the Group, including but not limited to the Consumer Protection Act 1999, the Personal Data Protection Act 2010 and the Copyright Act 1987 of Malaysia, the Law of the People's Republic of China on Protection of Consumer Rights and Interests, the Advertising Law of the People's Republic of China, the Patent Law of the People's Republic of China, the Data Security Law of the People's Republic of China and the Personal Information Protection Law of the People's Republic of China of the PRC and the Personal Data (Privacy) Ordinance of Hong Kong.

### Product and Service Quality

The Group attaches great importance to the quality of the products and services provided to the customers by strictly obeying the laws and regulations related to product quality. The Group has developed an internal control process to safeguard the quality of its products and services and to review the services provided. Meanwhile, as a responsible business operator, the Group provides a series of after-sale services. Follow-up work is well managed and relevant procedures are established in order to deal with the problems satisfactorily. The Group also actively seeks feedback from its clients to understand their demands and expectations, and will strive to make improvements based on their responses. During the Reporting Period, the Group did not receive any material product or service-related complaints (FY2023: Nil). Due to the Group's business nature, the Group's operations do not involve any product recalls.

### **Data Protection and Privacy**

The Group endeavours to protect all sensitive information pertaining to its customers and to take reasonable measures to preserve the integrity of customers' data and prevent any corruption or loss of customers' data. The Group has established the Data Protection and Privacy Policy. The said policy covers topics such as the handling and disclosure of confidential information, data breach and incident management, and policy review process. Besides, existing policies are reviewed annually to ensure that such policies continue to be compliant with local laws and regulations and industry regulatory requirements.

To further safeguard the customers' personal data privacy and the Group's confidential information, the Group spares no effort to ensure that its employees understand the importance and have proper knowledge in handling sensitive information. Employees of the Group are required to sign the non-disclosure agreement, employee's service agreement and fidelity guarantee service agreement.

### **IP Rights**

The Group uses various IP rights, in particular, trademarks and software copyrights, in its daily business. Any unauthorised use of the Group's domain names and/or other intellectual properties by the competitors in their corporate names or brands could harm the Group's image and erode its competitive advantage. Therefore, IP rights are considered to be the Group's important corporate assets and the Group requires that they are used properly. The Group has established the Intellectual Property Rights Policy to diligently guard against any violation of its IP rights. The said policy states the identification, application and protection against infringement of IP rights.

### **Customer Complaints Management**

The Revenue and Receipt Policy established by the Group states the roles and responsibilities of different employees with regard to managing customers' complaints and expectations. The Group believes that maintaining good communication with customers is critical to the Group's continuous development and we highly value feedback and complaints from our customers. The client relationship managers will schedule regular meetings with customers to ensure that their needs and expectations of the Group's products are met.

Should the Group receive any complaints, the Group's client relationship managers will act as the point of contact for complaints from customers. Where necessary, the issue will be escalated to the Directors. The Group strives to act in a timely manner to resolve the issue with effective corrective and/or remedial actions. In addition, complaints received will be discussed and reviewed by the management during regular meetings to prevent re-occurrence. The Group has established a set of standard operating procedures related to client servicing for new employees during probation to reduce the chance of receiving customer complaints.

### **Advertising and Labelling**

Due to the Group's business nature, the Group considers that it has an insignificant amount of business dealing in relation to advertising and labelling matters.

## **B7. Anti-corruption**

Solid corporate governance is vital to the Group's growth and development. The Group emphatically affirms its zero-tolerance stance regarding any behaviours that not only violate local laws and regulations but also severely damage the business integrity and reputation of the Group.

During the Reporting Period, the Group was not aware of any material non-compliance with laws and regulations relating to bribery, extortion, fraud and money laundering that would have a significant impact on the Group, including but not limited to the Anti-Corruption Commission Act 2009 of Malaysia, the Company Law of People's Republic of China and the Criminal Law of the People's Republic of China of the PRC, and the Prevention of Bribery Ordinance of Hong Kong. During the Reporting Period, there were no concluded legal cases regarding corrupt practices brought against the Group or its employees (FY2023: Nil)

### **Code of Conduct**

The Group has established a formal Staff Code of Conduct and Anti-corruption Policy that sets out appropriate methods for handling circumstances such as conflict of interests and corruption to comply with relevant laws and regulations. A summary of the Anti-corruption Policy of the Group is available on the Group's website. Employees are strictly prohibited to solicit personal gifts or donations. Under certain circumstances, the Group understands that it can be difficult to decline gifts, hence employees are allowed to accept the gift on behalf of the Group and are required to declare such courtesies and gratuities to the head of department.

### **Whistle-blowing Mechanism**

The Group has an Anti-bribery and Corruption and Anti-money Laundering Policy and Whistle-blowing Policy that aim to provide employees with guidance and reporting procedures to encourage employees to report fraudulent, economic extortion, and illegal activities. A summary of the policy is available on the Group's website. Whistleblowers are required to submit a written report to the audit committee of the Group regarding the suspected misconduct with supporting evidence. The Group will conduct a thorough investigation, if necessary, upon making a preliminary analysis on the report. The Group intends to protect the whistle-blower from common concerns such as confidentiality and potential retaliation or discrimination. Therefore, the employee reporting in good faith under the whistle-blowing mechanism can be assured of the protection against unfair dismissal or victimisation, even if the reports are subsequently proved to be unsubstantiated. Regular reviews are conducted to ensure the effectiveness of these procedures.

### **Anti-fraud and Anti-money Laundering**

With reference to the Anti-bribery and Corruption and Anti-money Laundering Policy and Whistle-blowing Policy, the Group has incorporated a section regarding Anti-money Laundering in order to raise employees' awareness on identifying possible fraudulent and illegal behaviours and provide suitable guidance on the reporting procedures should there be any suspected misconducts. The said policy safeguards the interests of the Group against material fraud risk and the risk of being used for money laundering.



### **Anti-corruption Training**

The Group strongly emphasises on operational compliance and strict compliance with relevant laws and regulations in its business ethics. To ensure that all employees can perform their duties with high ethical standards and professionalism, the Group has arranged anti-corruption training and encouraged employees to actively learn about the latest developments and future trends in anti-money laundering and the liability of bribery. During the Reporting Period, the relevant training materials have been distributed to the Directors, and 1 Director and 183 staff members have participated in training covering topics included but not limited to anti-bribery and corruption, anti-money laundering and personal data protection, with average training durations of approximately 1.5 hours and 1.6 hours, respectively (FY2023: 1 Director and 157 staff members participated in approximately 2 hours of anti-corruption training on average).

## **B8. Community Investment**

The Group realises the importance of giving back to the members of the society and encourages its employees to engage in community services and voluntary activities to give back to the less-abled and financially challenged members of the public. To understand the needs of the communities where the Group operates and to ensure its activities take into consideration the communities' interests, the Group has formulated the Community Investment Policy, which states its directions in engaging its employees in community participation and the selection criteria of suitable partners. The focus area of the Group is environmental concerns.

Owing to resource constraints, the Group did not organise and participate in charitable and voluntary activities during the Reporting Period. However, the Group has endeavoured to implement environmental-friendly measures in its business activities during the Reporting Period and its commitment to minimising negative impact to the environment and the community in its business operations remains resolute. The Group will reallocate its resources to focus more on community activities and contribute to the financially disadvantaged in the community in the future. The Group plans to give back to society through more active participation in community programmes, which not only benefit society but also nurture a good corporate culture.

