



中國稀土控股有限公司

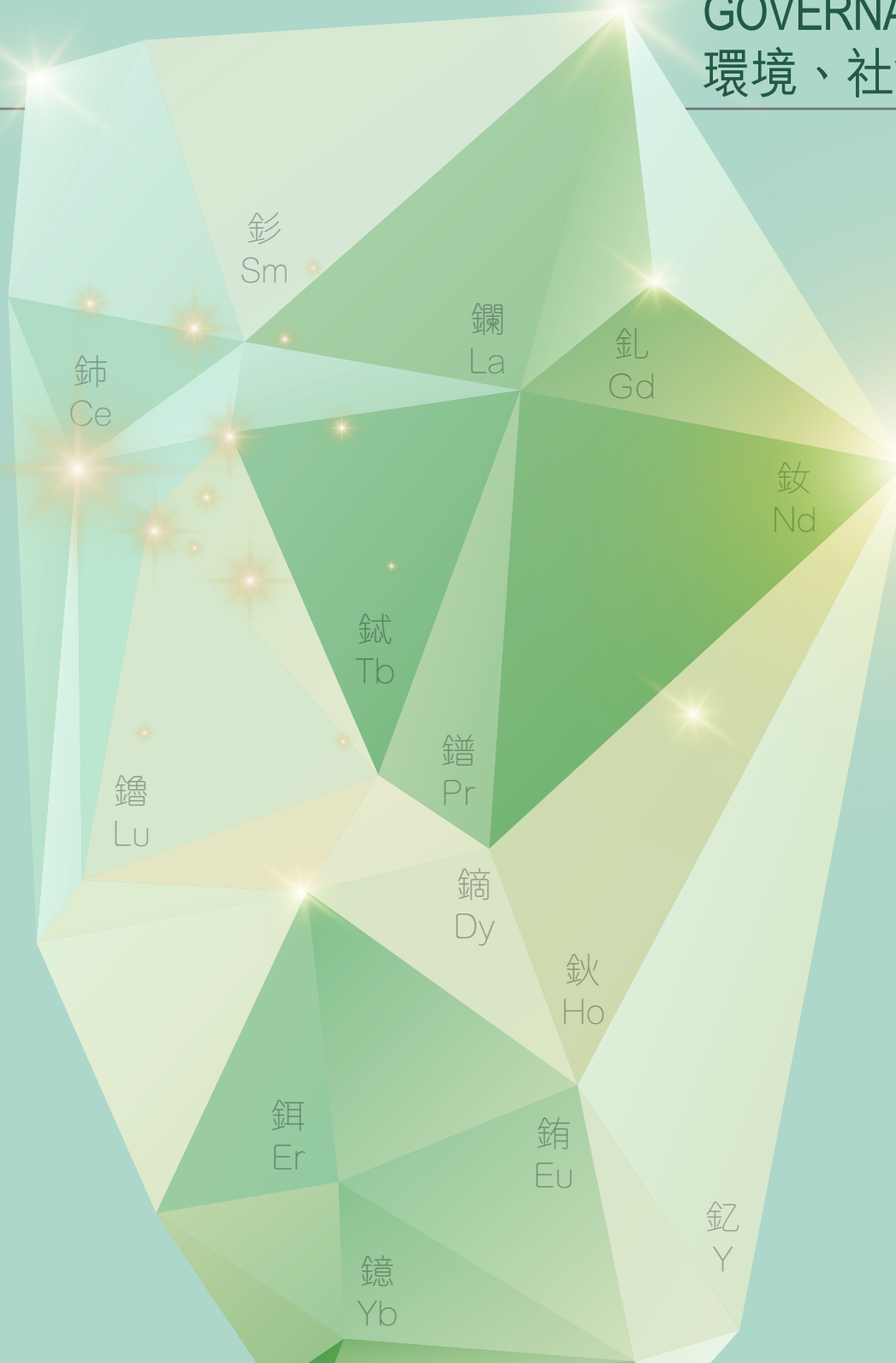
China Rare Earth Holdings Limited

(Incorporated in the Cayman Islands with limited liability)

(於開曼群島註冊成立之有限公司)

Stock code 股份代號：00769

# ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT 環境、社會及管治報告 2024



# 環境、社會及管治報告2024

## ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT 2024

### 關於本報告

本集團為中國最大規模的稀土及耐火材料生產企業之一，亦是中國首間在海外上市的稀土生產商。我們致力於實現環境的可持續發展，貢獻社會的福祉，並維持我們於稀土和耐火材料產業的競爭優勢。

本報告根據《香港聯合交易所有限公司證券上市規則》附錄C2所載的《環境、社會及管治報告守則》編製，並遵循重要性、量化及一致性<sup>1</sup>等報告原則。本報告經本集團董事會審閱及批准。

### 報告範圍

本報告呈列本集團於二零二四年一月一日至二零二四年十二月三十一日（「報告期」）核心業務的環境、社會及管治的管理方針、績效、實踐和重要議題。本報告範圍涵蓋本集團的主要業務，包括於中國江蘇省宜興市丁蜀鎮的總辦事處及以下四間核心附屬公司。

### ABOUT THE REPORT

The Group is one of the largest producers of rare earth and refractory materials in China, and the first rare earth producer in China listed overseas. We are committed to achieving environmental sustainability, contributing to social well-being, and maintaining our competitive edge in the rare earth and refractory industries.

The content of the Report is prepared in compliance with the “Environmental, Social and Governance Reporting Code” set out in Appendix C2 of the Rules Governing the Listing of Securities on The Stock Exchange of Hong Kong Limited, adhering to the reporting principles of Materiality, Quantitative, and Consistency<sup>1</sup>. The Report has been reviewed and approved by the Board of the Group.

### REPORTING SCOPE

The Report presents the management policy, performance, practice and material topics of the Group’s core business regarding ESG during the period from 1 January 2024 to 31 December 2024 (the “Reporting Period”). The Report covers the Group’s principal businesses, including the main office located in Dingshu Town, Yixing City, Jiangsu Province, the PRC and the following four core subsidiaries.

附屬公司 Subsidiary	營運地點 Business location	業務營運 Business activities
宜興新威利成稀土有限公司 Yixing Xinwei Leeshing Rare Earth Company Limited	江蘇省宜興市 Yixing City, Jiangsu Province	製造及銷售稀土產品 Manufacturing and sales of rare earth products
宜興新威利成耐火材料有限公司 Yixing Xinwei Leeshing Refractory Materials Company Limited	江蘇省宜興市 Yixing City, Jiangsu Province	製造及銷售耐火產品 Manufacturing and sales of refractory products
無錫新威高溫陶瓷有限公司 Wuxi Xinwei High Temperature Ceramics Co., Ltd.	江蘇省宜興市 Yixing City, Jiangsu Province	製造及銷售高溫陶瓷產品 Manufacturing and sales of high temperature ceramics products
海城市蘇海鎂礦有限公司 Haicheng City Suhai Magnesium Ore Company Limited	遼寧省海城市 Haicheng City, Liaoning Province	製造及銷售鎂砂產 Manufacturing and sales of magnesium grains products

<sup>1</sup> 本報告中所呈現的數據包括來自公開可得排放因子的估算，以及在無法獲取原始數據時所作的謹慎假設。這些估算旨在提供公司ESG表現的合理表徵，同時也承認隨著數據收集過程的完善，未來有進一步改進的機會。

<sup>1</sup> The data presented in this report includes estimates derived from publicly available emission factors, and prudent assumptions where primary data was unavailable. These estimates aim to provide a reasonable representation of the company’s ESG performance while acknowledging opportunities for future refinement as data collection processes are enhanced.

# 環境、社會及管治報告2024

## ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT 2024

### 意見反饋

我們重視您對本報告和我們可持續發展績效的反饋。如果您有任何意見或建議，歡迎隨時郵寄至香港九龍尖沙咀加連威老道100號港晶中心1011室與我們聯絡。

### 董事會聲明

中國稀土控股有限公司（「本公司」）及其附屬公司（統稱為「本集團」）的董事會（「董事會」）欣然發佈二零二四年度環境、社會及管治（ESG）報告，闡述本集團於二零二四年（「本報告年」）在履行環境與社會責任方面的制度建設和績效表現，以回應持份者的期望。

董事會在現行業務策略框架下監督環境、社會及管治（ESG）相關事宜及相關風險，並確保業務運作持續遵守本地法律法規，以保障本集團及其持份者的利益。本集團透過不同的職能部門及工作小組，定期收集環境、社會及管治資訊；然後匯總、分析及披露績效於年度環境、社會及管治報告內；於董事會的年度會議，董事會成員除了審視在環境、社會及管治報告中所披露的績效，還會評審與本集團業務策略的合適性及合規狀況，及識別對本集團及其持份者有重要性的可持續發展議題，從而作出合適決策，並在需要時調整相關策略。

### 可持續發展方針

本集團將企業社會責任視為我們的核心經營價值觀，透過積極參與環境及社會活動，為社會帶來價值。本集團管理層十分重視良好的企業管治，以確保本集團的成功及可持續發展。展望未來，管理層將持續檢討和制定相應的環境、社會及管治政策和目標，持續提升其績效，以優化報告披露。我們將在後面的章節中詳細介紹本報告年度的措施和績效。

### FEEDBACK

We value your feedback on the Report and our sustainability performance. If you have any opinions or suggestions, please contact us by mail to Room 1011, Harbour Crystal Centre, 100 Granville Road, Tsim Sha Tsui, Kowloon, Hong Kong.

### BOARD STATEMENT

The Board of Directors (the “Board”) of China Rare Earth Holdings Limited (the “Company”) and its subsidiaries (collectively referred to as the “Group”) is pleased to publish the 2024 Environmental, Social and Governance (ESG) Report, detailing the institutional construction and performance of the Group in fulfilling its environmental and social responsibilities in 2024 (the “Reporting Year”), so as to respond to stakeholder expectations.

The Board oversees ESG issues and their related risks within the framework of current business strategies and ensures that its operations continue to comply with local laws and regulations so as to protect the interests of the Group and its stakeholders. The Group regularly collects ESG information through various functional divisions and working groups, and then consolidates, analyses and discloses its performance in the annual ESG report. The Board reviews the performance disclosed in the ESG report, assesses the suitability and compliance of the Group’s business strategies, and identifies sustainability issues significant to the Group and its stakeholders at its annual meeting, thus making appropriate decisions and adjusting strategies if necessary.

### SUSTAINABILITY APPROACH

The Group regards corporate social responsibility as our core value of operation and brings value to society through active participation in environmental and social activities. The management of the Group attaches great importance to good corporate governance to ensure the success and sustainable development of the Group. Looking forward, the management will continue to review and formulate ESG policies and goals and improve its performance to improve report disclosure. Our performance and the measures taken during the Reporting Year are detailed in the subsequent chapters.

### 確定重要性的過程

#### 持份者參與

本集團明白與持份者緊密合作是管理業務的最佳方式。因此，我們高度重視持份者的利益和觀點，並致力與各持份者，包括客戶、供應商、僱員及投資者等維持緊密聯繫，了解持份者對本集團履行企業社會責任的期望，從而制定本集團社會責任的發展策略及目標。

本集團的高級管理人員定期與持份者進行會議和電話會議，以便交流和溝通。同時，我們通過電子郵件、公司郵箱和客戶服務熱線向持份者提供最新的發展情況。此外，客戶服務專員亦會與持份者保持接觸，傾聽他們的意見和需求。本公司在每年的中期報告及年報中向各股東匯報整體業績表現，並在環境、社會及管治報告中匯報社會責任表現。

此外，我們舉行股東大會，為股東及董事會提供溝通機會。董事會主席以及審核委員會、薪酬委員會及提名委員會之主席或其委任之代表，在股東週年大會上回答股東的提問。為更進一步促進與各持份者的有效交流，本公司設有官方網站 [www.creh.com.hk](http://www.creh.com.hk)，用於廣泛刊載本集團業務發展及營運最新訊息、財務訊息及其他訊息。

#### 評估

重要性評估流程有助本公司分析風險因素，在滿足持份者期望的同時，可改善其業務流程以開拓未來。有鑑於此，本集團已重新審視所識別的重要議題，並確認其在本報告期內仍具相關性。經識別的重要議題包括：

1. 職業健康與安全
2. 廢棄物管理
3. 廢氣排放及溫室氣體排放管理
4. 員工培訓與發展
5. 廢水排放管理

### PROCESS TO DETERMINE MATERIALITY

#### Stakeholder Engagement

The Group understands that the best way to manage our business is to work closely with our stakeholders. Therefore, we highly value stakeholders' interests and perspectives and endeavour to maintain close communication with various stakeholders including customers, suppliers, employees and investors to understand their expectations for the Group's performance in corporate social responsibility, thereby formulating the Group's social responsibility development strategy and goals.

The Group's senior management members hold meetings and conference calls with the stakeholders on a regular basis for the purpose of fostering effective communication and facilitating information exchange. Our latest updates are also communicated to the stakeholders through e-mail, corporate mail and customer service hotline. The customer service specialist is also in contact with the stakeholders to listen to their views and needs. The overall performance of the Company is reported to the shareholders in the interim report and annual report on an annual basis. The social responsibility performance is reported in the ESG report.

We also convene general meetings to provide opportunities for shareholders and the Board of Directors to communicate. The Chairman of the Board of Directors and the Chairmen of the Audit Committee, the Remuneration Committee and the Nomination Committee or their designated representatives answer shareholders' questions at annual general meetings. To further facilitate effective communication with the stakeholders, the Company has an official website at [www.creh.com.hk](http://www.creh.com.hk) for the extensive publication of the Group's business development and operational news, financial information and other information.

#### Assessment

The materiality assessment process enables the Company to analyse risk factors and improve its business processes for future development while meeting stakeholders' expectations. In light of this, the Group has reviewed its identified material topics and confirmed their continued relevance for this reporting period. These identified material topics are:

1. Occupational Health and Safety
2. Waste Management
3. Air Emissions and Greenhouse Gas Emissions Management
4. Employee Training and Development
5. Wastewater Discharge Management

### 環境承諾

#### A1 環境足跡

可持續發展是本集團的基石，我們將積極監控營運過程中的環境管理事項，致力於減少對環境的影響，履行對環境保護的持續承諾。

本集團嚴格遵守與廢氣及溫室氣體、向水及土地的排污、有害及無害廢棄物產生相關的法律及法規，包括《中華人民共和國大氣污染防治法》、《中華人民共和國固體廢物污染環境防治法》、《中華人民共和國環境保護法》和《中華人民共和國環境保護稅法》等相關環境保護法例。《中華人民共和國環境保護稅法》規定實體須就其產生的空氣與水污染物、噪音和固體廢物繳稅，以加強污染控制和保護環境。於報告期內，並沒有違規個案。

#### 廢氣

本集團的主要廢氣排放物為氮氧化物(NO<sub>x</sub>)、硫氧化物(SO<sub>x</sub>)及懸浮顆粒物(PM)。本報告期內的廢氣排放數據<sup>2</sup>如下：

### ENVIRONMENTAL COMMITMENT

#### A1 ENVIRONMENTAL FOOTPRINT

Sustainable development is the cornerstone of the Group. We will actively monitor environmental management issues during the operation process, strive to reduce environmental impact, and fulfill our continuous commitment to environmental protection.

The Group strictly complies with the laws and regulations on exhaust and greenhouse gases, discharge into water and land, and generation of hazardous and non-hazardous waste, including the "Air Pollution Prevention and Control Law of the People's Republic of China", the "Environmental Pollution by Solid Waste Prevention and Control Law of the People's Republic of China", the "Environmental Protection Law of the People's Republic of China", the "Environmental Protection Tax Law of the People's Republic of China" and other environmental protection laws. The "Environmental Protection Tax Law of the People's Republic of China" requires entities to pay taxes on air and water pollutants, noise, and solid waste that they generate to strengthen pollution control and environmental protection. There was no violation found during the Reporting Period.

#### Air Emissions

The Group's main air emissions are nitrogen oxides ("NO<sub>x</sub>"), sulphur oxides ("SO<sub>x</sub>") and particulate matter (PM). The air emissions figures<sup>2</sup> for the reporting period are as follows:

	單位 Unit	二零二四年 2024	二零二三年 2023
<b>廢氣種類</b>			
<b>Type of Exhaust Gas</b>			
<b>氮氧化物(NO<sub>x</sub>)</b>			
<b>Nitrogen Oxides (NO<sub>x</sub>)</b>			
由氣體燃料消耗而產生	公斤	473.20	450.67
Produced by gaseous fuel consumption	Kg	473.20	450.67
由汽車使用而產生	公斤	263.48	250.94
Produced by vehicular use	kg	263.48	250.94
由氣體燃料消耗而產生	公斤	209.72	199.73
Produced by vehicular use	kg	209.72	199.73
<b>硫氧化物(SO<sub>x</sub>)</b>			
<b>Sulphur Oxides (SO<sub>x</sub>)</b>			
由氣體燃料消耗而產生	公斤	1.64	1.56
Produced by gaseous fuel consumption	kg	1.64	1.56
由汽車使用而產生	公斤	1.31	1.25
Produced by vehicular use	kg	1.31	1.25
由氣體燃料消耗而產生	公斤	0.33	0.31
Produced by vehicular use	kg	0.33	0.31
<b>顆粒物(PM)</b>			
<b>Particulate Matter (PM)</b>			
由汽車使用而產生	公斤	15.25	14.52
Produced by vehicular use	kg	15.25	14.52

<sup>2</sup> 空氣排放量乃參照香港交易及結算有限公司發佈的《如何準備環境、社會及管治報告之附錄二：環境關鍵績效指標匯報指引》中公式及排放係數計算得出。

<sup>2</sup> Air emissions are calculated with reference to the formula and emission factor in "How to Prepare an ESG Report? Appendix 2: Reporting Guidance on Environmental KPIs" published by Hong Kong Exchanges and Clearing Limited.



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除了進一步加強天然氣、電耗和用水內控外，我們還針對已識別的排放源採取了多種措施，包括關注各項設備的廢氣排放量、制定廢氣監控標準、優化生產流程結構及集中時間段進行生產。

In addition to further strengthening the internal control over consumption of natural gas, power and water, we have also taken a variety of measures against identified emission sources, including paying attention to the exhaust emissions of various equipment, setting standards for monitoring exhaust gas, optimising production processes and concentrating production time.

#### 廢棄物管理

本集團深刻認識到廢物管理的重要性，因此已採取適當的措施以減少廢物，從而降低廢物對環境造成的危害。所有廢物都會進行細致的分類，包括可回收、不可回收和有害廢物，以避免與其他不相容的廢物混合。經過分類後的廢棄物將根據具體情況進行再利用或者儲存於指定區域。本集團主要處理的無害廢物包括一般工業固廢和生活垃圾，有害廢物主要為廢渣。

#### Waste Management

The Group fully realised that waste management is of great significance. Therefore, appropriate measures for reducing wastes have been adopted to mitigate the hazards of waste to the environment. We strictly regulate the process of collecting, sorting and transferring wastes to ensure compliance with the requirements of accredited service providers. All wastes are carefully categorised into recyclable, non-recyclable and hazardous wastes to make sure they are not mixed with other incompatible wastes. The categorised wastes will be reused or stored in a designated area as appropriate. The non-hazardous wastes disposed of by the Group are mainly general industrial solid wastes and household wastes, while the hazardous wastes are mainly slag.

	單位 Unit	二零二四年 2024	二零二三年 2023
有害廢棄物	公噸	0	0
Hazardous Waste	Tonne	0	0
密度	公噸／公噸產量	0	0
Intensity	Tonne/Tonne of Production	0	0
無害廢棄物	公噸	18.1	17.2
Non-Hazardous Waste	Tonne	18.1	17.2
密度	公噸／公噸產量	0.00047	0.00045
Intensity	Tonne/Tonne of Production	0.00047	0.00045

我們會根據環保部門的規定，將從廢渣中提取有價元素，並合理儲存於渣庫，最終按照法律法規和政策的要求，交由經過合格認證的廢物收集商或政府進行焚化、回收、處理和棄置。

Pursuant to the requirements of the environmental protection department, the slag will be properly stored in a slag warehouse after all valuable elements are extracted and finally transferred to a qualified waste collector or to the government for incineration, recycling, treatment and disposal pursuant to the requirements of laws, regulations and policies.

本集團非常重視環境保護工作，始終遵守地方各級環保部門的要求，並不斷加強和完善對各種固體廢物的管理。我們仍以稀土氧化物再加工和產品貿易為主要經營業務，通過對庫存和外部購買的稀土氧化物進行再加工，提高其規格，增加產品的附加值。

The Group recognises the importance of environmental protection, constantly complies with the requirements of local environmental protection departments at all levels, and keeps stepping up and improving the management of various solid wastes. We were engaged in the rare earth oxide reprocessing and product trading as our principal business, which means to enhance the specifications and increase the added value of the products by reprocessing the rare earth oxides in stock and purchased from external parties.

本年度的報告中並沒有涉及稀土礦產品的使用或廢礦的產生，這也是本年度有害廢物保持為零的原因之一。本年度的無害廢物排放強度相較於去年有所增加。

### 溫室氣體排放

本集團的主要廢氣排放來源為生產設施中的固定源燃料燃燒和車輛排放，我們已制定相應的環境保護政策，並在不同層級實施一系列措施，以管理和監控溫室氣體排放，同時減少碳足跡。

本報告期內，直接溫室氣體排放「範圍一」涵蓋由生產設施固定源燃料及營運車輛燃料的燃燒及耗用所產生的溫室氣體；而間接溫室氣體排放「範圍二」來自外購電力在生產過程中所引致的溫室氣體。能源間接溫室氣體排放「範圍二」來自外購電力在生產過程中所引致的溫室氣體。本集團的溫室氣體排放「範圍一」排放佔本集團總溫室氣體排放為17%，而「範圍二」排放為83%。

溫室氣體排放的總量(包括「範圍一」和「範圍二」)略有增加，排放密度(公噸二氧化碳當量／公噸產量)與上一報告期相比增加了約5%。

Neither rare earth minerals were used nor mineral wastes were generated as set out in the Report for the year, and this was also the reason why we had zero hazardous wastes during the year. The discharge intensity of non-hazardous waste for the year increased than that of the previous year.

### GHG Emissions

The Group's main sources of exhaust emissions are stationary fuel combustion in production facilities and vehicle emissions, and we have developed corresponding environmental protection policies and implemented a range of measures at different levels to manage and monitor greenhouse gas emissions while reducing our carbon footprint.

During the Reporting Period, the direct greenhouse gas ("GHG") emissions ("Scope 1") covered greenhouse gases produced by the combustion and consumption of fuels from stationary sources in production facilities and fuels for operating vehicles. The indirect GHG emissions of energy ("Scope 2") were GHG produced during the production process of purchased electricity. The "Scope 1" emissions accounted for 17% of the Group's total greenhouse gas emissions, while the "Scope 2" emissions accounted for 83%.

The total GHG emissions (including "Scope 1" and "Scope 2") increased slightly and the emission intensity (Tonnes Carbon Dioxide Equivalent ("tCO<sub>2</sub>e")/Tonne of Production) increased by approximately 5% compared with the previous reporting period.

	單位 Unit	二零二四年 2024	二零二三年 2023
<b>溫室氣體<sup>3</sup></b>			
<b>Greenhouse Gas<sup>3</sup></b>			
總量	公噸二氧化碳當量	<b>42,828.56</b>	40,789.10
Total	tCO <sub>2</sub> e	<b>42,828.56</b>	40,789.10
範圍一	公噸二氧化碳當量	<b>7,377.82</b>	7,026.49
Scope 1	tCO <sub>2</sub> e	<b>7,377.82</b>	7,026.49
範圍二	公噸二氧化碳當量	<b>35,450.74</b>	33,762.61
Scope 2	tCO <sub>2</sub> e	<b>35,450.74</b>	33,762.61
密度	公噸二氧化碳當量／公噸產量	<b>1.12</b>	1.07
Intensity	tCO <sub>2</sub> e/Tonne of Production	<b>1.12</b>	1.07

<sup>3</sup> 溫室氣體量乃基於聯交所發布的環境關鍵績效指標報告指引、二零零六年IPCC國家溫室氣體清單指南、IPCC第六次評估報告、最新全國電力平均排放因子計算得出。

<sup>3</sup> The amount of GHG gas was calculated based on the Reporting Guidance on Environmental KPIs issued by the Stock Exchange, 2006 IPCC Guidelines for National Greenhouse Gas Inventories, IPCC Sixth Assessment Report, and the latest Emission Factors for National Power Grids.

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### ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT 2024

我們制定了以下的量化目標，以管理和減低營運過程對環境的影響。

We have formulated the following quantitative goals to manage and reduce the impact of the operation process on the environment.

#### 能源使用效益 Energy Efficiency

能耗強度較上一個報告年下降3%  
Energy consumption intensity down by 3% compared to the previous reporting year

#### 減少排放 Emission Reduction

溫室氣體排放強度較上一報告期減少3%  
Greenhouse gas emission intensity down by 3% compared to the previous reporting period

#### 減少廢棄物 Waste Reduction

廢物排放強度較上一個報告年減少3%  
Waste discharge intensity down by 3% compared to the previous reporting year

#### 加強用水效益 Water Efficiency Enhancement

用水量強度較上一個報告年下降3%  
Water consumption intensity down by 3% compared to the previous reporting year



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我們亦制定方向性目標及策略，提高營運效率，以及資源利用率：

We also formulate directional goals and strategies to improve operational efficiency and resource utilization rate:

### 使用清潔能源 Use of Clean Energy

- 本集團配合國家政策方向，推進電力和天然氣等優質能源的使用，例如以燃氣鍋爐取代傳統鍋爐，從而減少運作時產出的空氣污染物。
- The Group follows the directions of the national policies and promotes the use of cleaner energy such as electric power and natural gas. For example, we replaced traditional boilers with gas-fired boilers, thereby reducing the amount of gaseous pollutant generated during operation.

### 以資訊科技互聯互通 Communication via Information Technology

- 本集團主張應用資訊科技如電話會議、視像會議或採用電子郵件取代不必要的出行活動，加強商務出行的節約管理；
- 在需要出行情況下盡量使用公共交通工具，從而減少因交通運輸所產生的廢氣及溫室氣體排放。
- The Group encourages employees to use information technologies such as telephone conferences, video conferences and email communications to avoid unnecessary trips and strengthen the management of business trips.
- If a business trip is necessary, public transportation should be used as much as possible to reduce the waste gas and GHG emissions generated by transportation.

### 室內空氣質素管理 Indoor Air Quality Management

- 本集團的廠區內禁止存放可能逸散粉塵、惡臭氣體的物質；
- 禁止燃燒物品，盡可能開窗通風或使用壁扇加強車間內的換氣流量；
- 裝設吸附塔吸收生產車間內的異味氣體；
- 辦公室室內及生產車間已實施全面禁煙，僅劃分部份室外範圍作為吸煙區。
- Substances that may emit dust and malodorous gas are not allowed to be stored in the plants.
- Incineration is prohibited. We ventilate as much as possible by keeping the windows open, or using wall fans to facilitate the airflow in the workshops.
- An adsorption tower is utilised to absorb the odor in the workshops.
- The Group has implemented a non-smoking policy in office area and production workshops, and some of the outdoor areas are specified as smoking areas.

### 重用再造 Reuse and Recycle

- 本集團鼓勵循環再用日常生產所需的資源，例如盡量選擇使用可再次充裝的辦公用品等。
- 本集團會分類收集及存放自身無法直接循環再用的物資，如包裝塑膠袋、工業保鮮膜、原料內包裝袋等，再交由具有相關資質的單位合規處理。
- The Group encourages the reuse of the resources needed in the daily production. For example, office supplies with refills are selected whenever possible.
- The Group segregates and stores resources that cannot be directly reused, such as packaging plastic bags, industrial plastic wraps and raw material packaging bags, and then transfers them to qualified agencies for proper disposal.

### 中水及雨水回用 Reuse of Reclaimed Water and Rainwater

- 本集團不斷探索改善生產用水給水方式，添置環保設備回收處理可再次利用的廢水及收集雨水。
- 在生產過程中實行串聯用水、梯級用水，以減少生產過程中廢水的產生量。
- Methods are being explored by the Group to optimise water use and supply in the production process; environmental friendly equipment has been added to recycle reusable sewage and rainwater.
- Series water use and progressive water use methods are adopted to reduce the generation of sewage from the production process.

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### A2資源使用

本集團致力於持續提升資源的有效利用，提升員工的環境意識，加強日常監測，並增加對技術的投資，以提高資源的利用率。

#### 能源消耗

於報告期內，與上一報告年度相比，本年度的電力消耗略有增加。生產設施的能源消耗強度在本年度略高於上一報告年度。

### A2 USE OF RESOURCES

The Group is committed to continuously enhancing the effective use of resources, raising employees' environmental awareness, strengthening daily monitoring, and increasing investment in technology to improve the utilisation rate of resources.

#### Energy Consumption

During the Reporting Period, electricity consumption for the Reporting Year increased slightly compared with the previous reporting year. The energy consumption intensity of production facilities in the Reporting Year is slightly higher than that in the previous reporting year.

資源使用 Use of Resources	單位 Unit	二零二四年 2024	二零二三年 2023
<b>直接能源</b> <b>Direct Energy</b>			
天然氣 Natural Gas	立方米 m <sup>3</sup>	1,269,407 1,269,407	1,208,959 1,208,959
	千瓦時 kWh	11,847,798 11,847,798	11,283,617 11,283,617
液化石油氣 Liquefied Petroleum Gas	公噸 Tonne	1,431.98 1,431.98	1,363.79 1,363.79
	千瓦時 kWh	18,297,516 18,297,516	17,426,206 17,426,206
<b>間接能源</b> <b>Indirect Energy</b>			
電力 Electricity	千瓦時 kWh	62,161,558 62,161,558	59,201,484 59,201,484
生產設施能源耗量 <sup>4</sup> Energy Consumption of Production Facilities <sup>4</sup>	千瓦時 kWh	92,306,872 92,306,872	87,911,307 87,911,307
密度 Intensity	千瓦時／公噸產量 kWh/Tonne of Production	2,410.01 2,410.01	2,295.67 2,295.67

<sup>4</sup> 生產設施能源耗量包括生產設施的電力、天然氣及液化石油氣用量，因其為生產設施最主要之能耗。其他消耗如乙炔、柴油及無鉛汽油等並不重要，故無計算在內。燃料消耗量由容積單位轉成能源單位的轉換因子乃參照《CDP技術說明：將燃料數據轉換為兆瓦時》。

<sup>4</sup> The energy consumption of production facilities includes consumption of electricity, natural gas and liquefied petroleum gas, as they are the main energies consumed by production facilities. Other consumption such as acetylene, diesel and unleaded gasoline, etc. are immaterial and therefore not included. The conversion factors for conversion of fuel consumption from volumetric units to energy units are determined by reference to the "CDP Technical Note: Conversion of fuel data to MWh".

本集團積極提升能源效益，專注節能減排升級，我們採取多種措施，例如為夏季期間的空調和閒置時的其他電力設備提供明確的使用指引、在車間遙控室的空調系統裝設了時間區域設置、於更換照明系統時採用能源效益表現較佳的LED燈具、逐步淘汰更換被國家列為高能耗的設備與電機。

我們也改善生產程序，減低能源的耗用。我們將不斷調整產品結構，多承接非燒製品訂單。我們也會合理運用空壓機等電機設備，逐批更換節能電機和壓力機，並利用峰谷電的電價差異，節省電費。同時，我們逐步淘汰老舊、能耗高的設備，並加強維護和更新計量工具，以提高安全用電的監督和檢查。為了提升能源效率，我們優先選擇更節能的設備，並有效地收集下游廢水。

### 水資源消耗

水經過沉澱和過濾處理後再利用，大大減少了原水的消耗。能源和其他資源的高效利用不僅降低了成本，還幫助本集團成為客戶的可持續合作夥伴。

	單位 Unit	二零二四年 2024	二零二三年 2023
水資源消耗 <sup>5</sup>	立方米	36,849.0	35,094.3
Water consumption <sup>5</sup>	m <sup>3</sup>	36,849.0	35,094.3
密度	立方米／公噸產量	0.96	0.92
Intensity	m <sup>3</sup> /Tonne of Production	0.96	0.92

為了提高資源使用效率，本集團積極推行綠色生產政策。我們制定了設備使用指引，指導員工適當使用器材，從多個方面實施節約資源措施。同時，我們重視定期保養、及時維修和正確操作生產設備，以確保其最佳運行效能。

The Group has made efforts in boosting energy efficiency and focused on energy conservation and emission reduction. The measures taken by us included providing clear guides for the use of air conditioners in summer and other idle equipment, setting up time zone setting for air conditioning system in the workshops' control rooms, replacing the lighting system with LED lights that are more energy efficient, and gradually replacing and retiring equipment and motors that are classified as high energy-consumption equipment under relevant country rules.

We will also improve our production procedures to reduce energy consumption. We will continuously adjust our product mix and accept more orders for non-burning products. We will also make reasonable use of air compressors and other motor equipment, replace energy-saving motors and press machines gradually, and take advantage of the difference in electricity price between peak and valley hours to save electricity charges. In addition to phasing out old and obsolete equipment with high energy consumption, we will maintain and update measurement tools and strengthen the supervision and inspection on the safe use of electricity. To enhance energy efficiency, we give preference to appliances that are more energy efficient, and collect downstream wastewater efficiently.

### Water Consumption

Water is reused after precipitation and filtration, which has greatly reduced the consumption of raw water. The efficient use of energy and other resources not only reduces costs, but also helps the Group to become a sustainable partner for customers.

To enhance efficiency in use of resources, the Group actively implements green production policies. We formulated user guides for equipment to facilitate proper operation by employees. The Group has implemented many resources saving measures. In addition, we emphasise regular maintenance, timely repair and proper use of production equipment, thereby ensuring equipment operate at the highest efficiency.

<sup>5</sup> 於報告期內，本集團在求取適用水源上並無重大問題。

<sup>5</sup> During the reporting period, the Group did not encounter any significant issues in sourcing suitable water sources.

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在生產過程中，質量檢測單位對每個環節進行質量檢測，以最大限度地減少廢品率。此外，本集團鼓勵辦公無紙化，盡量使用電子文檔進行審閱，以減少紙張、墨水匣、碳粉匣等資源的浪費。我們還對廢棄物進行分類收集和儲存，方便進行再利用或交由合資格的處理商進行回收。此外，本集團的主要包裝物料為紙料、鐵料、木料、塑膠、金屬和塑膠編織袋。

Quality inspection is conducted at each step in the production process to minimise scraps. In addition, the Group advocates a paperless office and electronic files are preferred when reviewing documents in order to reduce the waste of resources such as paper, ink cartridges and toner cartridges. Waste is segregated and stored by category to facilitate reusing and recycling by qualified agencies. In addition, the main packaging materials used by the Group are paper, iron, wood, plastic, metal and plastic woven bags.

	單位 Unit	二零二四年 2024	二零二三年 2023
包裝物料	公噸	236.72	225.45
Packaging Materials	Tonne	236.72	225.45
密度	公噸／公噸產量	0.0062	0.0059
Intensity	Tonne/Tonne of Production	0.0062	0.0059

### A3環境及自然資源

本集團致力於提高員工的環保意識，通過舉辦綠色活動來達到此目的，例如每年均舉辦一天無紙化辦公日活動，鼓勵節約用紙，並努力創造無紙辦公的環境。此外，我們也積極參與政府的植樹節活動，共同植樹，讓員工深入了解保育資源的重要性，並養成愛護綠樹的習慣。環境保護的概念同時亦被納入本集團的職工教育培訓綱要內，我們希望透過員工將環境保護訊息推廣至各持份者，如供應商、訪客、銷售客戶等。

本集團確保所選用的物資及生產過程符合國家的環保政策和法規要求。我們每年都在生產區進行環保檢測，以確保我們的營運符合相關的法律法規。本集團深明保護環境的重要性不僅僅局限於內部，供應鏈的配合至關重要。本集團已進向供應商宣導環境保護的重要性。

本集團要求所有供應商必須遵守所有相關環境法例法規，按法定環境標準行事，建立及遵行環境管理體系，以將營運對環境的影響降至最低，並持續改善環境保護水平。

### A3 THE ENVIRONMENT AND NATURAL RESOURCES

The Group seeks to strengthen employees' environmental protection awareness through green activities. For example, we organise Paperless Office Day each year to encourage paper conservation and create a paperless working environment. We also take active part in the tree planting activities organised by the government, join hands in planting trees, and instil in each employee the importance of conserving natural resources so that they develop a habit of protecting trees. The concept of environmental protection has been included into the Group's employee education and training programme, in order to promote environmental protection messages among stakeholders such as suppliers, visitors and customers through employees.

The materials selected by the Group, as well as the manufacturing process of its products, comply with environmental protection policies and regulations in China. Environmental audits are conducted in the production area each year to ensure that our operation complies with relevant laws and regulations. The Group understands that environmental protection should not fall only on the Group internally; the cooperation of supply chain is equally important. The Group has advocated to suppliers the importance of environmental protection.

The Group has requested suppliers to adhere to all relevant environmental laws and regulations and to act in accordance with legal environmental standards. The Group has also requested suppliers to establish and follow environmental management systems to minimise the environmental impact during operations and to continuously improve the standard of environmental protection.

### A4氣候變化

全球暖化引發氣候變化及極端天氣等危機，對人類健康及社區造成損害。本集團的管理層定期評估氣候變化帶來的風險，並持續監控已識別的可能導致自然災害或極端天氣事件的突發情況，從而預先為可能出現的財務風險做好準備。一旦識別出潛在風險，我們將制定相應的應急預案及對策，以確保能有效應對潛在突發事件。

### A4 CLIMATE CHANGE

Global warming leads to crises such as climate change and extreme weather, damaging human health and communities. The management of the Group regularly assesses the risks driven by climate change to us, and regularly controls the identified emergencies that may cause natural disasters or extreme weather events, so as to prepare for possible financial risks in advance. Once we identify potential risks, we will develop corresponding emergency plans and countermeasures to ensure we can deal with potential emergencies effectively.

風險類型 Risk type	風險描述 Risk description	應對措施 Response measures
急性風險	因氣候變化而引起的極端天氣事件，例如水浸、颱風及酷熱天氣等，有機會導致生產工廠受到破壞、供應鏈中斷及因停工而導致產能下降等風險。	為了應對氣候變化所帶來的潛在破壞，本集團已制定了應急工作原則、通報機制、撤離系統及事故調查要求，以協助員工有效應對各種緊急情況。例如，我們針對地震和極端天氣造成的水浸情況設置了防洪沙袋，並建立了相應的應急預案。此外，為了減輕可能因天災而導致的損失，本集團已購買財產保險。這項措施旨在提供經濟保障，以應對可能發生的意外情況。我們將持續努力確保組織內部的應急措施得到充分執行和遵守，以保護員工、財產和環境的安全。同時，我們會不斷評估和改進這些措施，以應對不斷變化的風險和需求。
Acute Risk	Extreme weather events caused by climate change, such as flooding, typhoon and extremely hot weather, may lead to risks such as damage to production plants, interruption of supply chains and reduction in production capacity due to shutdowns.	In order to deal with potential damage caused by climate change, the Group has formulated working principles, notification mechanism, evacuation system and accident investigation requirements in emergency situations to help employees effectively respond to various emergencies. For example, we have in place sandbags for flooding and corresponding emergency plans for flooding caused by earthquakes and extreme weather. The Group has also purchased property insurance to mitigate possible losses caused by natural disasters. This measure aims to provide economic security to cope with unexpected situations that may occur. We will strive to ensure that emergency measures within the Group are fully implemented and followed, so as to keep employees, property and the environment safe. Meanwhile, we will continuously evaluate and improve these measures to address ever-changing risks and needs.

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風險類型 Risk type	風險描述 Risk description	應對措施 Response measures
政策及法律風險	在與營運、產品和服務方面的氣候變化相關的監管規定日益收緊，從而導致營運成本增加、包括合規成本、產品開發成本增加。	在與營運、產品和服務方面的氣候變化相關的監管規定日益收緊，從而導致營運成本增加、包括合規成本、產品開發成本增加。
Policy and Legal Risks	Regulatory requirements related to climate change in operations, products and services are increasingly tightened, resulting in increased operating costs, including compliance costs and product development costs.	Various operating locations of the Group implemented a number of energy-saving and emission-reduction measures, and fully complied with all environmental laws and regulations. In the future, the Group will keep abreast of the latest laws and regulations, relevant policies and standards, and update and revise internal systems and standards in a timely manner. We target to improve the level of energy conservation and emission reduction while complying with regulations and maintaining production capacity, and strive to become a "green enterprise".

## 以人為本

### B1僱傭常規

本集團將僱傭法律法規的要求融入一系列僱傭政策中，以確保員工獲得公平合理的待遇。於報告期內，本集團嚴格遵守中國內地有關薪酬與解僱、招聘與晉升、工作時數、假期、平等機會、多元化、反歧視、其他待遇與福利，以及防止童工或強迫勞工的勞動法律法規，包括《中華人民共和國勞動法》、《中華人民共和國勞動合同法》及《中華人民共和國社會保險法》等。

## PEOPLE-ORIENTED

### B1 EMPLOYMENT PRACTICES

The Group integrates the requirements of employment laws and regulations into a series of employment policies to ensure that employees receive fair and reasonable treatment. During the Reporting Period, the Group strictly complied with the labour laws and regulations in the PRC relating to remuneration and dismissal, recruitment and promotion, working hours, holidays, equal opportunities, diversity, anti-discrimination, other treatment and benefits and prevention of child labour or forced labour, including the "Labour Law of the People's Republic of China", the "Labour Contract Law of the People's Republic of China", the "Social Insurance Law of the People's Republic of China".



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	二零二四年 2024		二零二三年 2023	
	員工人數 Number of Employees	流失比率 Turnover Rate	員工人數 Number of Employees	流失比率 Turnover Rate
性別 <b>Gender</b>				
男性 Male	214	8%	214	8%
女性 Female	91	5%	91	5%
年齡 <b>Age</b>				
18-30	5	0%	5	0%
31-45	46	4%	46	4%
46-60	234	3%	234	3%
>60	20	20%	20	20%
地區 <b>Region</b>				
中國 The PRC	305	8%	305	8%
工作類別 <b>Employment Type</b>				
全職 Full-time	299	不適用 Not Applicable	299	不適用 Not Applicable
兼職 Part-time	6	不適用 Not Applicable	6	不適用 Not Applicable
臨時工 Temporary worker	0	不適用 Not Applicable	0	不適用 Not Applicable

註： 本報告年計算乃基於聯交所最新發佈的社會關鍵績效指標匯報指引，並截止於二零二四年十二月三十一日。

Note: The calculations for the Reporting Year were based on the latest reporting guidelines for social KPIs issued by the Stock Exchange as of 31 December 2024.

本集團深信吸引和保留人才是我們業務可持續發展的關鍵所在。因此，我們一直以僱傭準則和工作環境為首要關注事項。我們極為重視員工的職業發展和身心健康，因此我們致力維護一個以多元化、學習和尊重為核心價值的優質工作場所。本集團不僅遵守各附屬公司所在地的勞動法規要求，還制定了完善的薪酬體系和福利政策，以確保所有員工獲得公平和合理的待遇。透過建立互相信賴的僱傭關係和融洽的工作氛圍，我們為企業穩步向前發展奠定了重要的基礎。同時，我們也通過保持員工的工作生活平衡，確保他們的身心健康。

The Group believes that attracting and retaining talent is the key to the sustainability of its business. Therefore, employment standards and working environment have always been our primary concerns. We care about the career development and physical and mental health of our employees, and therefore are committed to maintaining a quality workplace where diversity, learning and respect are our core values. Not only does the Group comply with local labour laws and regulations, but it has also developed sound wage systems and benefit policies to ensure all employees are treated fairly. By establishing a mutually trusted employment relationship and a harmonious working atmosphere, we have laid an important foundation for our stable development. We also ensure the physical and mental well-being of our staff by maintaining a work-life balance.

### 平等機會與多元共融

本集團尊重每個人的差異，給予每位求職者平等的求職權利，提供平等的就業機會，嚴禁歧視行為。在晉升員工時，僅參考員工的工作表現、經驗和個人能力，其他與工作無關的因素，如性別、年齡、種族、家庭狀況、宗教信仰或殘疾等，不會對員工的晉升機會產生任何影響。

### 員工保障及福利

本集團與所有員工均簽訂僱傭合約，所有員工均受相關勞動法律法規保障，並享有假期、法定有薪年假等權益。

本集團為員工購買社會保險，讓他們以較低的成本獲得醫療服務，並每年為所有員工進行健康檢查，特別對女性員工提供婦科檢查，同時為員工繳納住房公積金。對於不幸遭遇工傷或意外事故的員工，本集團將按照勞動法規提供合理的賠償，並關懷其家屬。

### 工作生活平衡

本集團重視協助員工紓解壓力，提升生活滿足感。維持良好的工作與生活平衡對員工的身心健康至關重要，而企業的發展亦與員工的身心健康息息相關。

本集團每年舉辦秋季運動會、員工交流會等活動，鼓勵員工在工作以外建立聯繫，促進員工與部門間的溝通，提升團隊合作精神，營造愉快的工作氛圍。

### B2健康與安全

保障員工的職業健康與安全是每一間企業的基本責任。因此，本集團積極採取安全機制，主動排查潛在隱患，提供必要的保護器具，監察並審核安全表現等措施。我們致力於為員工營造一個良好的工作環境，並以工作零事故為目標。

### Equal Opportunities, Diversity and Inclusiveness

The Group respects the differences between individuals, forbids any form of discrimination, and provides equal job opportunities to job candidates. Promotions are only based on employees' performance, experience and competence. Other attributes such as gender, age, ethnicity, family status, religion or disability will not affect an employee's opportunity to be promoted.

### Employee's Protection and Benefits

Employment contracts are signed between the Group and all its employees. All employees are protected by relevant labour laws and regulations. Employees enjoy holiday, statutory paid annual leave, etc.

The Group purchases social insurance for employees so that they can use medical services at a relatively low cost. It offers physical check-ups for all employees, with additional gynecological examinations for female employees. Moreover, it pays the Housing Provident Fund for employees. The Group makes reasonable compensation for employees and their families for work-related injuries and accidents in accordance with the labour law.

### Work-life Balance

The Group puts emphasis in helping employees de-stress, increasing employees' life satisfaction. Maintaining a good work-life balance is essential for employees' physical and mental health, and the development of the corporation is linked to employees' physical and mental health.

Autumn Sports Games, Employee Exchange Conference and other activities are held each year, which help encourage employees to get together outside work, improve communication among employees and departments, build teamwork and create a pleasant work atmosphere.

### B2 HEALTH AND SAFETY

Ensuring the occupational health and safety of employees is the basic responsibility of every corporation. Therefore, the Group takes the initiative to utilise an investigation mechanism to identify potential safety hazards, provides necessary protective equipment, monitors and audits safety performance. We strive to create a good working environment for our employees and achieve the goal of zero work-related accidents.

本集團遵守相關的職業安全健康法律法規，如《中華人民共和國職業病防治法》、《中華人民共和國安全生產法》和《中華人民共和國消防法》。於報告期內，本集團並沒有違反任何有關職業健康及安全相關的法律法規。過去三年內，我們沒有發生任何員工因工作原因而導致死亡的情況。

### 工作場所管理及保護設備

為了幫助和提醒員工了解各個工序的安全操作要點，本集團的廠區各車間和辦公室都會貼出設備安全操作規程和作業指引。同時，為了減少職業事故發生率和降低事故發生時的嚴重性，本集團也會為一些風險相對較高的工作崗位提供適當的保護設備。

### 安全監控及員工培訓

我們定期舉辦培訓課程，內容包括個人防護設備的使用方法、工作場所的潛在風險、應變程序和化學品處理等。這些培訓有助於提高員工的安全知識和警覺性，同時為他們提供應對職業危害的防範措施。工作場所的衛生方面，我們亦於工作場所的起居空間裝設告示板，用於張貼宣傳海報、內部規則及崗位職業病危害告示。此外，我們亦會定期進行急救演練、事故應對演習，以協助僱員熟悉逃生路線及正確使用相關設備以應對緊急情況。與此同時，本集團亦通過內聯網每年向員工發放職業危害告知確認書，以提高他們對安全意識的重視程度。

### B3發展及培訓

員工的專業能力與成長是業務發展的關鍵。因此，本集團致力於營造可持續發展的環境，讓員工得以發揮所長。為此，我們建立了培訓管理制度及培訓計劃，以識別員工及各部門的培訓需求。

本集團定期為員工提供培訓及進修機會，以提升團隊的專業技能和水平，並定期評估培訓成效，按需要作出相應調整。

The Group has adhered to relevant laws and regulations regarding occupational safety and health such as the "Prevention and Treatment of Occupational Diseases Law of the People's Republic of China", "Safe Production Law of the People's Republic of China" and "Fire Prevention Law of the People's Republic of China". During the Reporting Period, the Group did not violate any occupational safety and health laws and regulations. There were no work-related fatalities over past three years.

### Workplace Management and Protective Equipment

In order to remind employees of the safety practices for each process, the Group has posted equipment safety procedures and operation instructions in the workshops of factories and the office areas. In addition, to reduce the occurrences of occupational accidents and injuries caused by accidents, the Group also provides appropriate protective equipment for positions with relatively higher risks.

### Safety Control and Employee Training

We conduct regular training courses on the use of personal protective equipment, potential hazards in the premises, contingency procedures and the handling of chemicals. These training courses help enhance our employees' safety knowledge and awareness and provide them with precautions against occupational hazards. In terms of public health at workplaces, notice boards were erected in the living spaces of the workplace for posting publicity posters, in-house rules and occupational hazard signs. Moreover, we will conduct regular first-aid drills and accident response drills to help employees familiarise themselves with escape routes and use relevant facilities properly in case of emergencies. The Group also issues Occupational Hazard Acknowledge Letter to its employees through the intranet each year to raise their safety awareness.

### B3 DEVELOPMENT AND TRAINING

The professional competence and growth of employees are key to business development. Therefore, the Group always seeks to create an environment of sustainable development and enables employees to demonstrate their strengths. To this end, we have established the training management system and training programmes to identify the training needs of employees and department.

Training and refresher opportunities are provided to employees on a regular basis, so as to enhance the professional skills and standards of the team. We also regularly assess the training results and make adjustments as needed.

## 環境、社會及管治報告2024

### ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT 2024

為了促進本集團在各個領域的長期發展，我們非常關注建立人才梯隊，並提供支持，幫助員工發揮所長。這包括在日常工作中安排有經驗的員工指導新進員工，以幫助他們快速適應本集團的制度和文。

In order to promote the Group's long-term development in different areas, we focus on sustaining the talent echelon and providing support to help employees develop their strengths. This includes arranging for experienced employees to guide new employees during day-to-day work in order to help them quickly adapt to the Group's system and culture.

	二零二四年 2024		二零二三年 2023	
	受訓員工比例	每名員工的 平均培訓時數 Average Number of Training Hours per Employee	受訓員工比例	每名員工的 平均培訓時數 Average Number of Training Hours per Employee
性別 Gender				
男性 Male	72%	0.70	72%	0.70
女性 Female	28%	1.80	28%	1.80
員工職系 Employee Rank				
高級管理層 Senior Management	3.01%	8.36	3.01%	8.36
中級管理層 Middle Management	6.44%	3.90	6.44%	3.90
主管 Supervisor	8.15%	3.08	8.15%	3.08
其他員工 Other Employees	82.4%	0.30	82.4%	0.30

註：本報告年計算乃基於聯交所最新發佈的社會關鍵績效指標匯報指引，並截止於二零二四年十二月三十一日。

Note: The calculations for the Reporting Year were based on the latest reporting guidelines for social KPIs issued by the Stock Exchange as of 31 December 2024.

#### B4勞工準則

本集團對童工及強制勞工持有取零容忍態度，以保護未成年人士及僱員於工作場所免受奴役、抵債勞動及脅迫。我們嚴格禁止僱用童工及強制性勞動，僅會聘請符合法定年齡要求的員工，並尊重既定的工作時間，不會強迫員工超時工作，從而維持一個尊重人權的工作環境。若被揭發任何童工及強制勞工個案，本集團將毫不猶豫地依法處理並審視我們的管理方法，以防止事件再次發生。

#### B4 LABOUR STANDARDS

The Group has zero tolerance towards child labour and forced labour, so as to protect minors and employees from slavery, bonded labour and coercion in the workplace. The Group strictly prohibits the use of child labour and forced labour. It only employs employees of legal age and never forces employees to work overtime to maintain a work environment that respects human rights. If any cases involving child labour and forced labour are uncovered, the Group will not hesitate to handle such cases according to laws, and will review its management methods to avoid reoccurrence of the incident.

當人力資源部在招聘新員工時，會進行嚴格的身份識別及背景調查，核實其證明文件，確保應徵者合資格受聘並達到法定年齡。自從制定這些規定以來，我們從未發生過聘用未成年員工的情況。同時，人力資源部亦會每月定時查看工作考勤記錄，調查是否有員工在非自願情況下超時工作，以確保工作時間的合理性。為了讓僱員全面了解自身權益及其工作範圍，他們需要按自願及公平基準簽署具法律約束力的合約。此外，我們尊重僱員的決定，他們可以在提前通知後自由離職。此反童工及強制勞工政策也適用於我們的生產鏈，本集團不會與聘用童工或強制勞工的供應商合作。

本集團深知勞工準則的重要性及其關鍵作用，並致力於嚴格遵守相關法規及法律，從而促進合乎道德的聘任及保障僱員權益。本集團嚴格遵守有關防止童工或強制勞工的相關法律及規例，包括《中華人民共和國勞動法》及《禁止使用童工規定》，於報告期內並未有違規情況。

### 卓越營運

#### B5 供應鏈管理

履行企業責任必須由不同持份者共同承擔及推進，因此，本集團制訂了《中國稀土供應商行為準則》，從法律、禁止貪污賄賂、員工的基本人權、健康與安全、環境保護等各方面向供應商提出了具體的規範要求。為了符合本集團的整體營運方針，我們要求供應商具備相關資格，包括執照、環保認證、安全生產認證、職業健康認證等相關資格。

除此之外，我們堅持負責任的採購方式，優先選擇耐用、合規、安全和環保的原材料，以確保產品質量。在符合生產條件和進料標準的前提下，我們優先考慮本地供應商或交通距離較近的供應商，並選擇最適合的運輸方式，以減少廢氣和溫室氣體的排放。每年，我們定期評估活躍且重要的供應商，通過問卷調查、電子郵件或會面等方式，評估供應商是否符合我們的要求。在報告期內，本集團有18個活躍供應商，均來自中國內地。

When recruiting new employees, the Human Resources Department will conduct stringent identification and background checks and verify their supporting documents to make sure that the candidates are eligible for employment and of legal age. Since these policies were implemented, no minors have been employed. The Human Resources Department also reviews attendance records on a regular basis to see if any employees are forced to work overtime, so as to ensure reasonable working hours. In order for our employees to have a full understanding of their rights and interests as well as their scope of duties, they are required to enter into a legally binding contract on a voluntary and fair basis. Furthermore, we respect the decisions made by our employees such that they are free to resign from their positions by giving prior notices. This anti-child labour and forced labour policy also applies to our production chain as we will not work with suppliers that employ child labour or forced labour.

The Group recognises the importance and critical role of the labour code. It strives to strictly comply with relevant regulations and laws to promote ethical employment and safeguard employees' rights. The Group strictly complies with relevant laws and regulations on the prevention of child labour or forced labour, including the "Labour Law of the People's Republic of China" and the "Rules on the Prohibition of Use of Child Labour". There was no violation during the Reporting Period.

### OPERATIONAL EXCELLENCE

#### B5 SUPPLY CHAIN MANAGEMENT

Fulfilling corporate responsibility must be carried out and promoted by different stakeholders together. The Group has therefore developed the "Code of Conduct for Rare Earth Suppliers in China" to set out specific requirements for suppliers in terms of compliance with laws, anti-corruption, employees' basic human rights, health and safety, and environmental protection. To align with the Group's overall operational policy, we have required suppliers to obtain qualifications such as licensing, environmental certifications, production safety certifications, and occupational health certifications.

In addition, we implement responsible sourcing by prioritising durable, compliant, safe and eco-friendly raw materials to ensure the quality of our products. On the premise of fulfilling production standards and input requirements, we prefer local and nearby suppliers and select the most appropriate transportation tools to ship goods to reduce exhaust gas and greenhouse gases emissions. We conduct periodic assessments of active and key suppliers annually to assess whether the suppliers meet our requirements through questionnaires, e-mails or interviews. During the Reporting Period, the Group had a total of 18 active suppliers from mainland China.



## B6產品責任

本集團遵循ISO9001品質管理體系標準，持續改進品質管理，同時遵守法規並滿足客戶需求。本集團只向合格供應商採購原材料，以確保生產材料的優良品質。技術部門將負責解決技術問題，並與生產部門合作改善產品質量。

在報告期內，本集團嚴格遵守有關產品的安全與健康、廣告、標籤等的法律法規，如《中華人民共和國產品質量法》，並沒有因安全與健康原因而需要回收已售或已運送的產品。

為保障客戶權益，本集團嚴格按照相關合約及危險品相關法律法規制定產品交付標準。倘若有任何與產品質量改善有關的資訊，銷售部門將及時通知客戶。如有已售產品出現質量問題，本集團將負責召回相關產品，並與客戶協商後續安排。

為協助客戶解決產品質量問題，提升對本集團產品的信心，我們設立了熱線電話並提供現場跟進服務。此外，我們亦設有客戶投訴熱線，並透過傳真及電郵等渠道與客戶溝通，力求在接獲任何投訴後12小時內提供令客戶滿意的回應。於報告期內，未有接獲任何關於產品及服務的投訴。

## 信息保護

本集團非常重視保護客戶的隱私，制定了消費者資料保障及私隱政策，以防止敏感資料外洩。僱員必須嚴格遵守有關保護客戶私隱的守則，僅在獲得客戶同意後方可在內部複製、轉發和披露機密資料，包括客戶的商業資料。所有客戶資料皆按照檔案管理要求進行嚴格保管。

## B6 PRODUCT RESPONSIBILITY

The Group complies with the ISO9001 Quality Management System, and continues to improve quality management while conforming with regulations and satisfying the customers' needs. All raw materials are of high quality and are provided by qualified suppliers. The Technical Department is responsible for solving technical problems and collaborating with the Production Department to improve product quality.

During the Reporting Period, the Group strictly complied with the "Product Quality Law of the People's Republic of China" and other laws and regulations on product safety and health, advertising and labelling, and no products sold or shipped by the Group were recalled for safety or health reason.

To protect the interests of customers, product delivery standards are set up in strict accordance with relevant contracts and laws and regulations related to hazardous goods. Customers will be informed of any quality improvement information by the Sales Department in a timely manner. If there are quality issues for any of the products sold, the Group will be responsible for recalling the products and negotiating with the customer for follow-up arrangements.

To help customers solve product quality issues and improve customer confidence in the Group's products, we set up a hotline and provide on-site tracking services. We have also set up a customer complaint hotline as well as communication channels through fax and e-mail so as to provide customers with satisfactory responses within 12 hours upon the receipt of any complaint. During the Reporting Period, we did not receive any complaints about products and services.

## Data Protection

The Group values the protection of customer confidentiality and has developed consumer data protection and privacy policy to prohibit disclosure of sensitive information. Employees are required to strictly abide by the code of practice on protection of customer privacy and obtain customer consent before copying, forwarding and disclosing confidential information internally, including the customer's commercial information. All customer information is in strict control with file management requirements.



保密級別分為普通、機密、絕密，且根據保密級別不同，保密要求亦不同。紙質材料則有專人保管，獲得授權查閱資料的人員必須進行備案登記，而電腦系統內的資料將根據保密要求而設置相應等級的授權級別及查詢密碼。我們亦為相關僱員制定保密協定，他們必須充分了解自己的責任，並承諾保護本集團及客戶的敏感資料。如有違反保密規定的情況，我們定必徹查並採取法律行動。報告期內，本集團未發現嚴重違反有關私隱事宜的法律和法規，包括《個人信息保護法》。

### 知識產權

本集團充分認識到知識產權的重要性，並通過制定一系列指導方針和措施，對知識產權的維護和保護給予高度重視。本集團嚴格遵守有關知識產權保護的相關法律法規，並未發生任何違規情況。

如果產品在生產過程中涉及任何版權問題，必須在使用前獲得權利所有人的同意。本集團致力於既不購買盜版產品，也不使用未經授權的圖像或設計。同時，本集團設立了專門的圖片庫供員工使用，並積極註冊由員工創造的產品設計和製造技術的專利。

### B7反貪腐

本集團一直秉持著高水平的商業誠信，對於任何貪污、賄賂、勒索、欺詐和洗黑錢等行為絕不容忍。本公司的董事局成員來自不同背景，共同監督本集團的管理政策，確保公司遵守著嚴格的商業道德。

本集團所有的物料採購都按照《採購招標管理制度》進行。所有以合約方式有償取得的物資、工程和勞務，包括購買、租賃、委託等，都必須透過公開招標的形式進行。評價和考核的標準包括投標方的資質、物資的質量、數量、價格、運送時間等各方面因素，以確保我們的商業活動公正、平等、公開和透明。

The confidentiality levels are divided into regular, confidential and top secret. According to the different confidentiality levels, the confidentiality requirements are also different. Paper documents are managed by designated personnel and people who have been authorised to review the documents must make relevant records. Data in the computer system is protected with the use of privilege levels and passwords based on confidentiality. Certain employees have to sign non-disclosure agreements to thoroughly understand their responsibilities and undertake to protect sensitive information of the Group and customers. In the event of a breach of confidentiality, we shall investigate thoroughly and take legal actions. During the Reporting Period, the Group did not notice any serious violation of the "Personal Information Protection Law" and other laws and regulations on privacy matters.

### Intellectual Property Rights

The Group fully understands the importance of intellectual property rights and pays great attention to the maintenance and protection of intellectual property rights by formulating a set of guidelines and measures. The Group strictly complies with relevant laws and regulations related to the protection of intellectual property rights, and there has been no violation.

If a product involves any copyright issue during the production process, it is required to obtain the consent of the owner before use. The Group is committed to neither purchasing pirated products nor using images or designs that are not authorised. At the same time, the Group has set up its own picture library for employees to use and actively registered patents for product design and manufacturing technology created by employees.

### B7 ANTI-CORRUPTION

The Group adheres to high standard of business integrity and has zero tolerance for any corruption, bribery, extortion, fraud and money laundering. With different backgrounds, the Board members of the Company collectively supervise the Group's governance policy to ensure that the Company conforms with strict business ethics.

All the materials of the Group must be procured in accordance with the "Procurement and Bidding Management System". All the Group's procurement activities, including all materials, projects and labour that are outsourced, purchased, leased or commissioned through contracts, must be conducted through public bidding. The bidders' qualifications, the quality, quantity, price and delivery time-frame of the materials are used as the evaluation and assessment criteria, so as to ensure that our business activities are fair, balanced, open and transparent.

## 環境、社會及管治報告2024

### ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT 2024

一旦發現任何違反本集團誠信價值觀的行為，我們將立即終止合作關係。我們的員工在任何情況下都不得向客戶、供應商或其他商業夥伴收取或提供任何形式的利益，例如贈品、招待、獎勵或佣金。我們要求員工在與政府官員和業務單位的聯繫中注意言行，以避免引起誤會。

如果有員工違反了這些規定，將受到紀律處分，嚴重情況下甚至可能面臨法律行動。我們將堅守商業誠信的原則，確保公司的運營健康有序，並維護企業的良好聲譽。

本集團委託獨立審核機構進行半年度審閱和整年度審核，以確保賬目的準確性，保障股東的利益。同時，我們會根據審核機構的報告內容改進財務內部監控制度。除此之外，本集團亦建立了員工舉報機制，通過多種途徑接收和處理不當行為的舉報，包括電話、短信、微信、信函、郵件和面談等方式。

一旦接到舉報，我們會立即展開調查並匯報給董事長或總裁，所有舉報個案都會嚴格保密並做好存檔。在本報告期內，我們並未發現任何嚴重違反相關法律和法規的情況，包括《中華人民共和國刑法》、《中華人民共和國反洗錢法》和《中華人民共和國反不正當競爭法》等。同時，本集團和本集團僱員也沒有涉及任何貪污的法律案件，這表明我們的內部監控和風險管理措施有效運作。

Partnership shall be terminated upon identifying any conducts violating the Group's values of integrity. Our employees shall under no circumstances receive or offer benefits of any kind, such as gifts, entertainment, incentives or commissions, from or to customers, suppliers or any other business partner. We require employees to be careful with their words and deeds when communicating with government officials and business units to avoid misunderstandings.

Any employee who violates any of the rules shall be subject to disciplinary action up to legal action. We will adhere to the principle of business integrity, ensure the healthy and orderly operation of the Company, and maintain a good corporate reputation.

The Group has engaged an independent audit organisation to conduct semi-annual reviews and annual audits in order to ensure the correctness of the Group's accounts and protect the interests of the shareholders, while improving its financial internal control system based on the report prepared by the audit organisation. The Group has also set up a whistleblowing mechanism for employees, so as to receive and handle report on misconduct through various channels including telephone, SMS, WeChat, letters, emails and face-to-face conversations.

We will investigate immediately upon receipt of the report, and the results will be submitted to the Chairman or CEO. All the reported cases will be kept confidential and documented. During the Reporting Period, we did not notice any serious violation of relevant laws and regulations, including the "Criminal Law of the People's Republic of China", the "Anti-Money Laundering Law of the People's Republic of China" and the "Anti-Unfair Competition Law of the People's Republic of China". Besides, the Group and its employees have not been involved in any legal cases of corruption, indicating the effectiveness of our internal control and risk management measures.

我們致力於提供反貪培訓給管理層和一般員工。培訓內容包括《上市公司防貪系統實務指南》和《中華人民共和國刑法》中貪污受賄的相關條款。在會議和培訓中，員工和管理層需要學習中央文件、法律法規以及上市公司有關防貪反貪規定。此外，我們還舉辦了反腐倡廉大講堂，邀請相關專家進行講座，播放警示教育片，並提供學習資料供書面學習。在報告期內，我們為管理層提供了總計約20小時的反貪腐培訓，並為普通員工提供了約20小時的培訓。

We provide anti-corruption training for the management and general staff, covering provisions on anti-corruption and anti-bribery in the "Anti-Corruption Programme — A Guide for Listed Companies" and the "Criminal Law of the People's Republic of China". Employees and the management are required to learn documents of the central government, laws and regulations, and relevant provisions on the prevention and combat of corruption of listed companies at meetings and training sessions. In addition, we organised lectures on anti-corruption by inviting relevant professionals to give lectures, playing educational videos, and providing written materials for learning. During the Reporting Period, we provided a total of approximately 20 hours of anti-corruption training for the management, and approximately 20 hours of training for general staff.

## 社區參與

### B8 社區投入

本集團積極參與並支持當地社區和政府機構舉辦的各類活動。我們鼓勵員工參與志願者活動和公益活動，並推廣關懷文化。在報告期內，我們的員工共投入了50小時的志願服務，期望為社會作出貢獻。

## COMMUNITY ENGAGEMENT

### B8 COMMUNITY INVESTMENT

The Group actively participates in and supports events organised by the local community and government authorities. We encourage employees to participate in volunteer activities, public welfare activities, and promote a caring culture. During the Reporting Period, our employees devoted a total of 50 hours to voluntary services, hoping to make a contribution to the society.



中國稀土控股有限公司  
China Rare Earth Holdings Limited

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香港九龍尖沙咀加連威老道100號港晶中心10樓1011室  
Unit 1011, 10/F., Harbour Crystal Centre, 100 Granville Road, Tsim Sha Tsui, Kowloon, Hong Kong  
[www.creh.com.hk](http://www.creh.com.hk)