Environmental, Social and Governance Report

2020



Kwan On Holdings Limited 均安控股有限公司

III.

(incorporated in the Cayman Islands with limited liability) Stock Code: 1559

I. ABOUT THE REPORT

Objectives of the Report

This environmental, social and governance ("ESG") report (the "Report" or the "ESG Report") published by Kwan On Holdings Limited and its subsidiaries ("Kwan On", the "Group", "We") aims to provide the performance of the Group in respect of the environmental, social and governance aspects in a transparent and open manner over the past year, in response to the concerns and expectations of our stakeholders on the sustainable development of the Group.

Scope of the Report and Reporting Period

The Report covers the reporting period from 1 April 2019 to 31 March 2020 (the "Reporting Period" or the "Year"), which is in conformity with the Group's financial year. The Report sets out the ESG obligation, managing approach, performance and initiatives of Kwan On as a licensed contractor. In particular, the environmental KPIs disclosed in the Report covers our headquarter in Hong Kong, as well as the construction sites of our key civil construction projects (the "Key Construction Projects") selected by our directors. The Key Construction Projects cover 10 contracts¹ tendered by Kwan On Construction Company Limited ("Kwan On Construction"), the principal operating subsidiary of Kwan On, which include Civil Engineering and Development Department contracts (KL/2012/03, CV/2015/01, NE/2016/05, GE/2018/03, GE/2018/01), West Kowloon Cultural District Authority contract (GW1538), Housing Authority contracts (20170102 and 20189126), Drainage Services Department contract (DC/2018/10) and Highways Department contract (HY/2018/12). On the other hand, the social KPIs covers the general business across the Group².

Reporting Standards

The Report has been prepared with reference to the requirements set out in the Environmental, Social and Governance Reporting Guide under Appendix 27 to the Rules Governing the Listing of Securities on The Stock Exchange of Hong Kong Limited (the "HKEx"). During the process of preparation of the Report, we summarised the Group's performance in terms of corporate social responsibilities based on the reporting principles of "materiality", "quantitative", "balance" and "consistency". Please refer to the table below for our understanding of and response to these reporting principles.

¹ Environmental KPIs are reported on a broader scope than the 2019 ESG Report, with the number of Key Construction Projects increased from 3 to 10.

² Social KPIs cover the general business across Kwan On, including our construction-related business and property development businesses in Hong Kong and Southeast Asia.

Reporting	Implications	Our responses
principles		
principles Materiality	Where ESG issues are sufficiently important to investors and other stakeholders, they should be reported by issuers.	The Report identifies the stakeholders associated with Kwan On and presents their concerns. We also describes how we have determined the key issues and prioritise those issues using a materiality matrix. In addition, we have stated the provisions of "comply or explain" in relation to the matters not to be disclosed as they are not material to the Group and the reasons for making this decision.
Quantitative	KPIs should be disclosed in a measurable manner. The issuer may set targets to reduce a particular impact thus the effectiveness of ESG policies and management systems can be evaluated and validated. Quantitative information should be accompanied by a narrative, explaining its purpose, impacts, and giving comparative data where appropriate.	The Report made quantitative disclosure about KPIs, and reported on the standards, methods or inputs for calculation used to compile KPIs and the sources of the conversion factors used.
Balance	The ESG Report should provide an unbiased picture to avoid selections, omissions, or presentation formats that may inappropriately influence a decision or judgment by the report reader.	This Report discussed our achievements and challenges in sustainability.
Consistency	The issuer should use consistent methodologies to allow for meaningful comparisons of ESG data over time.	The Report used consistent methodologies wherever possible and explains any changes to the methodologies adopted last year.

Collection of Data

The information disclosed in this Report is derived from the Group's formal documents, statistics or public information. The Board is responsible for the truthfulness, accuracy and completeness of its contents.

II. PRINCIPLE AND GOVERNANCE OF SUSTAINABLE DEVELOPMENT

Objectives of Sustainable Governance and Development

The Group regards sustainable development as one of the core values of its business operations and is committed to integrating the concept of sustainable development into its business and management, with a view to become a reputable and respected green civil construction contractor. The Group is committed to fulfilling our environmental and social responsibilities by proactively maintaining the quality of our professional services and adhering to operational standards, with an aim to build a green and sustainable future for the next generation.

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Sustainable Governance Strategies

In line with the Group's concept of sustainable development, we have established a top-down Environmental, Social and Governance ("ESG") framework: the Board is responsible for formulating ESG strategies, assessing and identifying the Group's ESG risks, as well as ensuring the effectiveness of our risk management and internal controls; senior management is responsible for organising relevant initiatives in accordance with our ESG strategies and reporting to the Board on the progress of our ESG initiatives and the preparation of the Group's annual ESG report; the administration department, human resources department, financial accounting department, procurement department and project department are responsible for the execution of ESG initiatives, including the collection of stakeholders' feedback, internal and external materiality assessment and preparation of ESG reports. They shall report the progress of ESG-related issues and the preparation of ESG reports to the senior management.

Involvement of the Board

The Board is committed to integrating sustainable development into the Group's business development and assumes full responsibility for the following:

- assess and identify the Group's ESG-related risks and opportunities;
- ensure the Group has appropriate and effective risk management and internal control system in place;
- formulate the Group's ESG management approaches, strategies, priorities and objectives;
- review the progress and performance of ESG-related issues; and
- review and approve the disclosures in the Group's ESG Report.

The Board regularly assesses, identifies and manages the risks associated with sustainable development and identifies potential opportunities by complying with regulatory requirements and industry practices to create long-term value for our stakeholders. In addition, the Board regularly reviews the progress of each ESG target and adjust them where appropriate and feasible to minimise the adverse impact on the society and environment.

III. STAKEHOLDER ENGAGEMENT

Our understanding of and response to stakeholders' opinions are fundamental to the formulation and implementation of the Group's short-term and long-term development strategies. To understand their concerns and to progress and grow together, the Group proactively engages with key stakeholders, including shareholders and investors, the government, our employees, customers, suppliers and the community, through diverse communication channels such as seminars, trade unions, surveys or other platforms.

The table below summarises how we communicate with our stakeholders, their concerns and our action plans.

Stakeholder	Communication	Major demands/	Our action plans
groups	methods/channels	concerns	
Shareholders	General meetings	Maximise	Regular general
and investors	Annual and interim	investment returns	meetings
	reports	Enhance company	Regular board
	Company	value	meetings
	announcements	Facilitate	 Frequently meet and
	 Analyst meetings 	information	hold conference with
	 Meetings and 	transparency	investors
	conference calls	and effective	
	with investors	communication	
The government	Public consultation	Fulfill regulatory	Compliance with
	Seminars	requirements	national laws and
	 Reports/Surveys 	 Pay tax on time 	regulations
	 Interviews 	and in compliance	 Create jobs
		with laws	• Pay tax in full, on time
		Maintain good	and in compliance
		relationship with	with laws
		the government	
		Promote	
		employment	

Stakeholder	Communication	Major demands/	Our action plans
groups	methods/channels	concerns	
Employees	 Opinions surveys Staff caring and welfare campaigns Mental health counseling channels Staff mailbox Internal communications 	 Provide a healthy and safe working environment Enhance vocational skills Provide more training opportunities Access to benefits 	 Organise training courses for professional development, enhancing vocational skills and promoting safety procedures Identify employees' personal development needs and perform a fair and objective assessment Create a competitive workplace Staff caring and welfare campaign
Customers	 Listen to customer feedback and handling enquiries or complaints Customer communication meeting Customer satisfaction surveys 	 Provide quality services Respect for privacy and confidentiality 	 Normalization and standardization of services Conduct regular satisfaction surveys Timely response to and handling of customer complaints
Suppliers and subcontractors	 Sharing sessions Review on suppliers' and subcontractors' performance Communication meeting Conference Call Survey 	 Enhance transparency in procurement process Ensure the selection process is conducted in a fair and equitable manner 	 Provide equal chances for competing suppliers and subcontractors Improve selection system for suppliers and subcontractors Establish an open and transparent tendering system

Stakeholder	Communication	Major demands/	Our action plans
groups	methods/channels	concerns	
Community	 Hotlines for handling complaints Social charity events 	 Invest in public welfare Adopt green operation strategies Participate in community building Promote community well-being Care for the underprivileged groups 	 Organise regular community charity activities Hold charity events Promote energy saving and environmental protection

IV. MATERIALITY ASSESSMENT

In order to determine key disclosures for the Report, we have conducted materiality assessment on ESG issues with our stakeholders. The procedures of the materiality assessment are set out as below:

Step 1: Identify ESG issues

The Group identified the following 15 ESG issues based on the existing operations, and taking into the consideration of the disclosure requirements of "Environmental, Social and Governance Reporting Guide" and ESG management priorities in our industry.

ESG aspects		Number	ESG issues
A. Environmental	Aspect A1: Emission	1	Greenhouse gas emissions
		2	Hazardous and non-hazardous
			wastes
		3	Water consumption
	Aspect A2: Use of Resource	4	Energy saving
	Aspect A3: The Environment	5	Impacts of business activities
	and Natural Resources		on environment and natural
			resources

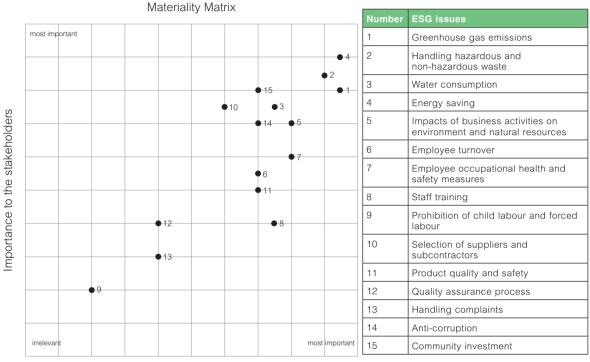
ESG aspects		Number	ESG issues
B. Social	Aspect B1: Employment	6	Employee turnover
	Aspect B2: Health and	7	Employee occupational health
	Safety		and safety measures
	Aspect B3: Development	8	Staff training
	and Training		
	Aspect B4: Labour	9	Prohibition of child labour and
	Standards		forced labour
	Aspect B5: Supply Chain	10	Selection of suppliers and
	Management		subcontractors
	Aspect B6: Product	11	Product quality and safety
	Responsibility	12	Quality assurance process
		13	Handling complaints
	Aspect B7: Anti-corruption	14	Anti-corruption
	Aspect B8: Community	15	Community investment
	Investment		

Step 2: Materiality Assessment

The Group's management conducted meetings based on the opinions gathered from the engagement with our stakeholders and rates the degree of relevance and importance of every ESG issues from 0 to 10 (0 represents irrelevant; 10 represents most important).

Step 3: Priority

Based on the score, we prioritised the issues in two dimensions, namely "importance to stakeholders" and "importance to our operation", and prepared the materiality matrix as below. Issues at the right upper quadrant are defined as the most important issues to the Group's business operation and our stakeholders.



Importance to our operation

The Group is principally engaged in undertaking civil construction contracts in Hong Kong. While we rely on a stable workforce and our subcontractors to complete our projects, generation of different emissions during the course of our operation is inevitable. According to the results of the materiality assessment, emissions, employment, and supplier and subcontractor management are of utmost concern to Kwan On and our stakeholders. We will continue to improve our sustainability performance by attaching more attention to these issues, regularly reviewing major ESG issues, and actively engaging with our stakeholders.

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V. ENVIRONMENTAL ASPECTS

Kwan On acknowledges the importance to maintain sustainable development in its daily operation. While striving to expand our business, the Group has always been committed to the green concept of protecting our ecological environment and slowing down the depletion of natural resources. We have implemented various resource conservation and environmental protection initiatives with an aim to reduce the direct impact on environment in the course of our business.

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A1: Emissions

The Group strictly complies with emission-related laws and regulations such as "Air Pollution Control Ordinance", "Water Pollution Control Ordinance" and "Waste Disposal Ordinance", which clearly set out the requirements for the discharge of pollutants. To be effectively in line with and in compliance with the relevant requirements, we have formulated and strictly implemented internal policies such as the "Waste Management Regulations" to provide clear guidance to our staff for their environmental protection routine.

Air and Greenhouse Gas Emissions

The main sources of the Group's air and greenhouse gas emissions are gasoline and diesel consumption, purchased electricity, paper waste, fresh water and sewage. During the Reporting Period, the Group generated approximately 93 kg of nitrogen oxides, 2 kg of sulphur oxides and 1,044 kg of particulate matter, while the total greenhouse gas emissions were amounted to approximately 926 tonnes of carbon dioxide equivalent.

In order to reduce air and greenhouse gas emissions, Kwan On has implemented a series of environmental protection management initiatives to manage the emissions generated from our office premises and construction projects, covering details in the procurement of construction materials, operation of construction machinery and vehicles, and electricity and paper consumption.

Sources of Air and Greenhouse Gas Emissions and the Measures Taken

Sources of air and	
greenhouse gas emissions	Measures taken
Fuel Consumption	Kwan On has taken a series of measures to reduce air and direct greenhouse gas emissions generated from fuel consumption (Scope 1 ³) as follows:
	 Construction vehicles and machinery deployed for the delivery of materials must meet the government's environmental and energy efficiency requirements; More eco-friendly construction materials, machinery and vehicles are used;
	Switch off the engine of an idling vehicle;
	• Encourage our staff to use public transport wherever possible; and
	 Regular maintenance and repairing of machinery, equipment and vehicles to maintain engine performance and fuel efficiency.
Purchased Electricity	Electricity consumption is the Group's major indirect source of greenhouse gas emissions (Scope 2 ⁴). During the Reporting Period, 58% of the total greenhouse gas emissions is attributed to the use of purchased electricity. Since 2015, the Group has been actively participating in the Energy Saving Charter on Indoor Temperature promoted by the Electrical and Mechanical Services Department to reduce electricity consumption by maintaining the average indoor temperature at 24°C to 26°C (especially during summertime). In addition, to further reduce the daily electricity consumption in our offices, we prefer electronic appliances with energy efficiency labels, replace the fluorescent tube in our offices with LED and encourage our staff to develop eco-friendly habits such as turning off lights and air conditioning after work.

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³ Scope 1 emissions cover direct greenhouse gas emissions from operations that are owned or controlled by the Group.

⁴ Scope 2 emissions cover "energy indirect" greenhouse gas emissions resulting from the Group's internal consumption (purchased or acquired).

Sources of air and	
greenhouse gas emissions	Measures taken
Paper waste	Methane generated from the Group's disposal of paper waste
	at landfills has contributed to other indirect greenhouse
	gas emissions (Scope 3) ⁵ . To reduce greenhouse gas
	emissions, we actively encourage our employees to print
	internal documents on both sides and develop eco-friendly
	photocopying habit. Apart from reducing paper waste at
	source, the Group also encourages its employees to recycle
	paper waste in order to raise their awareness of saving paper.
Fresh water and sewage	Electricity consumed by governmental departments in treating
	water and sewage discharged by the Group also contributes to
	other indirect greenhouse gas emissions (Scope 3). Therefore,
	Kwan On has implemented various water saving measures
	to reduce our water consumption. For example, we install
	restrictors on our faucets and perform regular maintenance on
	our water fixtures to reduce water consumption and eliminate
	drips and leaks. Kwan On also limits the amount of detergents
	and chemicals used to reduce the wastewater discharged.
	In addition, wastewater is collected and treated by sewage
	treatment facilities before being discharged to the sewers. The
	Group's discharges also comply with the pH value, suspended
	solid and chemical oxygen demand standards stipulated in
	the Discharge Licence issued by the Environmental Protection
	Department.

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Summary of Air Emissions

Air Emission ⁶	Unit	During the Reporting Period
Nitrogen oxides (NO _x)	kg	93.42
Sulphur oxides (SO _x)	kg	2.14
Particulate matter (PM)	kg	1,044.10

⁵ Scope 3 emissions cover all other indirect greenhouse gas emissions that occur outside the Group.

⁶ The air emission is calculated based on the "How to prepare an ESG Report – Appendix 2: Reporting Guidance on Environmental KPIs" published by HKEx and "Energy Consumption Indicators and Benchmarks" published in 2020 by Electrical and Mechanical Services Department of HKSAR(https:// ecib.emsd.gov.hk/index.php/hk/energy-utilisation-index-hk/transport-sector-hk).

Summary of Greenhouse Gas Emissions and the Intensity

		During the Reporting
Greenhouse gas ^{7, 8}	Unit	Period
Scope 1: Direct greenhouse gas emission		
Generated from mobile combustion sources	Tonnes carbon	387.04
	dioxide equivalent	
	("tCO2e")	
Total amount of direct carbon dioxide equivalent	tCO2e	387.04
emission		
Intensity of total amount of direct carbon dioxide	tCO2e/project	38.70
equivalent emission		
Scope 2: Indirect greenhouse gas emission		
Generated from electricity consumption	tCO2e	536.21
Total amount of indirect carbon dioxide equivalent	tCO2e	536.21
emission		
Intensity of total amount of indirect carbon dioxide	tCO2e/project	53.62
equivalent emission		
Scope 3: Other indirect greenhouse gas emission	· · · · ·	
Generated from disposal of paper waste at landfill	tCO2e	2.24
Generated from consumption of electricity for fresh	tCO2e	0.29
water and sewage processing by the governmental		
departments ⁹		
Total amount of other indirect carbon dioxide	tCO2e	2.53
equivalent emission		
Intensity of total amount of other indirect carbon	tCO2e/project	0.25
dioxide equivalent emission		
Total greenhouse gas emission	· · ·	
Total greenhouse gas emission	tCO2e	925.78
Intensity of total greenhouse gas emission	tCO2e/project	92.58

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⁷ The greenhouse gas emission is calculated based on the "How to prepare an ESG Report" Appendix 2: Reporting Guidance on Environmental KPIs" published by HKEx.

⁸ The scope of calculation of intensity of total greenhouse gas emission cover the Key Construction Projects selected by our directors.

⁹ According to the 2018/19 Annual Report issued by the Water Supplies Department of the HKSAR and the 2018/19 Sustainability Report issued by the Drainage Services Department of the HKSAR, the electricity consumption per unit of treated fresh water and sewage are 0.606 kWh and 0.28 kWh respectively.

Hazardous Waste

The Group do not generate a significant amount of hazardous waste due to its business nature, KPI A1.3 (total amount of hazardous waste generated) is therefore not applicable to our business and the relevant data is not disclosed. If we generated any hazardous wastes, we will hand them over to registered and licensed recyclers for disposal in order to comply with relevant environmental regulations and rules.

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Non-hazardous Wastes

The non-hazardous waste generated by the Group is mainly paper waste and construction waste. During the Reporting Period, the Group generated a total of approximately 0.5 tonnes of paper waste and 460 tonnes of construction waste.

Through good planning on site housekeeping and stockpile management, proper segregation and storage of materials, as well as avoiding the purchase of non-essential materials, Kwan On endeavors to avoid and reduce the generation of paper waste and construction waste. Since 2014, the Group has also been advocating Hong Kong Environmental Protection Department's "A Food Waste & Yard Waste Plan for Hong Kong 2014-2022" by nominating representatives from the principal business of the Group as Waste Reduction Officers to raise employees' awareness on recycling and waste reduction.

Sources of	
Non-hazardous waste	Measures taken
Paper waste	Kwan On has implemented a series of paper saving measures to reduce the generation of paper waste and boost employees' awareness on paper saving:
	 Encourage our employees to use digital documents and two-side printing; Encourage our employees to recycle used paper; Set up a collection point in our office to promote paper recycling; Encourage our employees to use email or notice boards for internal communications; and Suggest everyone to bring their own cup to reduce the use of disposable paper cups.

Sources of Non-hazardous Waste and the Measures Taken

Sources of	
Non-hazardous waste	Measures taken
Construction waste	The Group has established a series of green procurement
	management initiatives for its construction business to reduce
	construction waste. We procure material in several phases
	according to our construction schedule and taking into
	account how many construction materials we need and when
	will we use them. This could prevent construction materials
	from being wasted due to prolonged storage, maximise the
	utilisation of construction materials and avoid the generation
	of excess construction waste. Kwan On also requires our staff
	to, wherever possible, procure recyclable or reusable materials
	with low environmental impact that are non-hazardous to
	human.
	The Group also formulates environmental management plan
	which states that potential recycling or reuse of construction
	materials should be considered before disposal. If materials
	can be recycled or reused, we will arrange for their collection
	and reuse to reduce waste. We will also pick out waste with
	recycle potential and assign our waste reduction officers to
	record and inspect the removal.

Summary of Non-hazardous Waste Disposal and the Intensity

Non-hazardous waste ¹⁰	Unit	During the Reporting Period
Paper waste	Tonne	0.47
Construction waste	Tonne	459.70
Total amount of non-hazardous waste	Tonne	460.17
Intensity of total amount of non-hazardous waste	Tonne/project	46.02

¹⁰ The scope of calculation of intensity of total amount of non-hazardous waste cover Key Construction Projects selected by our directors.

A2: Use of Resources

Both enhancing resource efficiency and reducing energy consumption are key environmental issues to the Group. To fulfill our corporate responsibility to protect the environment, we have formulated the Management Rules on Energy Saving and Reduction of Consumption, which outlines a series of measures to save energy and reduce emissions, with a view to save as many resources as possible and minimise energy consumption.

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Energy Use

The Group's direct energy consumption is mainly attributed to the use of diesel and petrol from mobile sources, and our indirect energy consumption is mainly attributed to purchased electricity. During the Reporting Period, the Group's total energy consumption was approximately 2,267 kWh in '000.

To enhance energy efficiency, the Group proactively implemented energy saving initiatives in our daily office operation and construction projects. In order to reduce the energy consumption of motor vehicles used for transportation, we strongly encourage our employees to use public transports. In addition, we have adopted various electricity saving measures to reduce the Group's indirect energy consumption, which include monitoring the use of motor vehicles and electricity consumption in our operation sites on a monthly basis, encouraging employees to turn off all lighting and electrical equipment not in use after work, purchasing and using electrical equipment with energy-saving labels wherever possible, using LED lights for illumination and maintaining the average room temperature at 24°C to 26°C. Since 2015, the Group has also been actively advocating Energy Saving Charter and 4T Charter Schemes jointly promoted by the Hong Kong Environment Bureau and the Electrical and Mechanical Services Department and has displayed posters of the charter scheme at prominent locations to encourage our staff to save energy.

Summary of Energy Consumption and the Intensity

		During the Reporting	
Energy ^{11, 12}	Unit	Period	
Direct energy consumption			
Diesel	kWh in '000	240.09	
Petrol	kWh in '000	1,172.49	
Direct energy consumption	kWh in '000	1,412.59	
Intensity of direct energy consumption	kWh in '000/project	141.26	
Indirect energy consumption			
Purchased electricity	kWh in '000	854.87	
Indirect energy consumption	kWh in '000	854.87	
Intensity of indirect energy consumption	kWh in '000/project	85.49	
Total energy consumption			
Total energy consumption	kWh in '000	2,267.45	
Intensity of total energy consumption	kWh in '000/project	226.75	

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Water Consumption

The Group consumes water from municipal water supply and therefore has not encounter any issues while sourcing water. During the Reporting Period, the Group consumed approximately 14,431 m³ of water. To optimising the use of water resources, Kwan On carries out various water saving initiatives in its operations, including:

- Regular maintenance of water facilities to prevent drips and leaks;
- Use of equipment such as wet and dry vacuum cleaners and sweeper vehicle;
- Installation of restrictors on faucets;
- Installation of high pressure faucets in pantries; and
- Post tips on how to reduce water consumption.

¹¹ The energy consumption is calculated based on the "How to prepare an ESG Report – Appendix 2: Reporting Guidance on Environmental KPIs" published by HKEx.

¹² The scope of calculation of intensity of total energy consumption cover the Key Construction Projects selected by our directors.

Summary of Water Consumption and the Intensity

		During the Reporting
Water consumption ¹³	Unit	Period
Water consumption	m ³	14,431
Intensity of water consumption	m ³ /project	1,443

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Use of Packaging Material

Due to the nature of our business, the Group does not consume a large amount of packaging material for product packaging, KPI A2.5 (total packaging material used for finished products) is therefore not applicable to our business and the relevant data is not disclosed.

A3: The Environment and Natural Resources

To fulfill our corporate social responsibility, Kwan On is committed to minimising the impact of our business operations on the environment and natural resources. The "Procedures for Identification and Assessment of Environmental Factors and Preventive Control" formulated by the Group provides guidances for us to identify potential environmental impacts during the course of construction and operation of our projects and formulate mitigation measures to reduce such impacts to an acceptable level. For example, construction site tends to produce a lot of dust, therefore we have adopted dust prevention measures and conceal dusty materials and stockpile in our sites to minimise our environmental impact. In addition, we are aware that pests in construction site will not only cause damage to the structure and foundation of buildings, but also cause nuisance to community in the vicinity. Therefore, we have formulated a comprehensive and efficient pest solution. In addition to regular application of pest control spray, pest-prone area is recorded for follow-up action. Our construction projects may also generate noise pollution, therefore we installed noise barriers and noise monitoring equipment in our sites. The Group is committed to giving its best to adhere to the concept of green development and explore innovative solutions to minimise its impact on the environment and natural resources in order to build an environmentally friendly business.

¹³ The scope of calculation of intensity of total water consumption cover the Key Construction Projects selected by our directors.

VI. SOCIAL ASPECTS

B1: Employment

We believe that our employees are one of the important assets for the sustainable development of a business. Kwan On strictly complies with the laws and regulations on remuneration and dismissal, working hours, rest periods, equal opportunities, anti-discrimination and other benefits and welfare such as "Employment Ordinance", "Employees' Compensation Ordinance", "Disability Discrimination Ordinance", "Sex Discrimination Ordinance", "Race Discrimination Ordinance", "Minimum Wage Ordinance" and "Mandatory Provident Fund Schemes Ordinance". In order to effectively fulfill and monitor such requirements, we have formulated internal policies such as the "Recruitment Management System", "Attendance and Leave Management System" and "Fair Treatment Policy", which cover prudent recruitment procedures and fair treatment protocols, with a view to provide a decent working environment for our employees to unleash their potential and enhance their satisfaction and sense of belonging to the Group. As at 31 March 2020, the Group employees.

Recruitment and Promotion

In terms of recruiting, the Group strictly implements its "Recruitment Management System" to ensure the overall standard of our human resources. To attract high caliber staff, Kwan On adopts a transparent recruitment process to recruit capable employees in a fair manner as well as attracts and recruits staff using multiple channels, including but not limited to posting online information and engaging headhunters. During our recruitment process, we look for integrity, team spirits and vocational ethics in the candidates. We also adopt the principles of openness and fairness in establishing a series of fair promotion criteria to regularly evaluate the performance and contribution of our employees, in order to encourage all our staff to unveil their true potential and improve their performance.

Compensation and Benefits

In respect of staff remuneration and benefits, the Group has been actively reviewing and improving the staff remuneration and benefits system. We regularly analyse market data and trends on remuneration and benefits, and adjust our staff remuneration and benefits according to our business development and the market standard to ensure that the Group's remuneration and benefit system remains competitive in the market. In terms of salaries and bonuses, the Group has a comprehensive performance appraisal system in place, based on which regular performance appraisals are conducted and staff salaries and annual bonuses are adjusted and distributed according to the results. In terms of benefits, employees are entitled to a wide range of employee benefits, such as insurance, annual leaves, sick leaves, various allowances and severance payments. We frequently organise staff activities, such as festive parties, to maintain a harmonious relationship between the Group and our employees.

Working Hours and Holidays

The Group formulates "Attendance and Leave Management System" to regulate the legal working hours of our employees on a daily or weekly basis. In addition to basic annual leaves and statutory holidays, employees are also entitled to other paid leaves such as marriage leaves, bereavement leaves and maternity leaves.

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Equal Opportunities, Diversity and Anti-Discrimination

Kwan On is committed to creating a working environment free of discrimination for our employees so they can work in an environment with fair competition, mutual respect and diversity. In accordance with our "Recruitment Management System" and "Fair Treatment Policy", we uphold the principles of openness, fairness and equity in our recruitment process and treat all candidates equally in terms of hiring criteria and selection process to ensure that all of them are entitled to equal employment opportunities. From recruitment to daily operations, the Group strictly prohibits any forms of discrimination or harassment against any employees based on religion, ethnicity, race, gender, age, sexual orientation, disability, education and nationality to ensure that all employees are treated fairly. During the Reporting Period, the Group recorded no cases of discrimination.

B2: Health and Safety

We attach great importance to occupational health and safety. In order to provide a decent and safe working environment, the Group strictly complies with relevant laws and regulations on health and safety such as "Occupational Safety and Health Ordinance" and the "Employees' Compensation Ordinance". To create a safe, healthy and comfortable working environment for our staff, Kwan On has formulated and strictly implemented "Project Safety Plan", which stipulates the responsibilities in safety of our management and staff at all levels and our subcontractors. The Group's management also conducts regular safety meetings with our site supervisors and safety officers to update and revise our "Project Safety Plan" when needed. In addition, the Group disseminates our "Safety Policy" and "Internal Safety Rules" to our employees and subcontractors to allow them to understand the importance of occupational safety.

The health and safety measures implemented include but are not limited to:

- Conduct regular interviews to show care for our staff and understand their needs;
- Provide protective gears such as safety helmets and gloves for our staff;
- Take out work injury insurance for our staff;
- · Review on accidents and injuries regularly to ensure proper handling of work injuries;

- Provide appropriate training to our staff and appoint supervisors to guide them on the correct posture when handling heavy or bulky items;
- Inspect the machinery in advance and ensure that they are only operated by trained professional workers;
- Perform regular maintenance on machinery to prevent malfunctioning;
- Erect warning signs in areas with potential occupational hazards; and
- Engage professionals to conduct regular site inspections and oversee the implementation of the "Project Safety Plan".

B3: Development and Training

The Group has always attached great importance to employees' professional skill improvement, and is committed to providing continuous training courses and learning opportunities for its employees to enhance their vocational skills and knowledge, so they can grow together with the Group. During the Reporting Period, the Group provided a total of approximately 1,260 hours of training to the staff involved in our projects.

We have designed a series of training programs for different targeted groups:

- **Training for construction workers:** Provide training on occupational safety issues to allow our construction workers to have a comprehensive understanding and knowledge of our project features and safety information;
- **Training for new staff and newly-transferred staff:** Provide training and counseling on job functions, technical operations, rules and regulations to prepare them for their new duties;
- **On-the-job training:** Provide training courses on job-specific skills to ensure that the professional skills and knowledge of our staff are kept up-to-date; and
- **Training for management:** Provide courses and seminars to enhance their professional knowledge and leadership skills required as our management, allowing them to fully understand and implement the Group's decision-making approach.

We make reference to the professional guidelines and relevant health and safety training published by the Hong Kong Construction Association, the Occupational Safety and Health Council, Labour Department and other professional bodies when we design and regularly update our training contents to ensure that our employees are updated with the latest work safety information. In addition, to assist our staff in their career development and to encourage lifelong learning, we also provide our staff with various education allowances and examination leaves.

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B4: Labour Standards

In order to safeguard the legal rights and interests of our employees, the Group strictly complies with laws and regulations on the prevention of child labour or forced labour, such as the "Employment Ordinance". During the Reporting Period, the Group did not record any cases of non-compliance of laws and regulations relating to the employment of child labour and forced labour.

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Kwan On has formulated the "Recruitment Management System", which stipulates that our human resources department shall conduct background checks during recruitment in order to eliminate the use of child labour. To avoid the use of forced labour, the Group follows the principles of equal, voluntary and consensual. When we enter into employment contracts or agreements with our employees, we set out clearly the required employment conditions such as location, time and remuneration in accordance with the laws.

B5: Supply Chain Management

Kwan On understands that an efficient partnership with our supply chain partners is one of the essentials to become a responsible and sustainable business. During the Reporting Period, the Group sourced goods and services from 50 Hong Kong suppliers and 1 Mainland supplier, and partnered with 8 Hong Kong subcontractors.

The Group's "Service Provider Management System" provides well-defined criteria for the selection of suppliers and subcontractors. While selecting suppliers and subcontractors, their performance is competitively evaluated to ensure that they meet our technical standards and share our environmental vision. Aspects to be evaluated include product or service quality, technical capability, ethical practices, health and safety standards, and environmental and social performance. To build a responsible supply chain which provide high quality services, our suppliers and subcontractors are continuously monitored and evaluated using fair and strict criteria in the following three occasions:

- Immediate assessment: Conduct immediate assessment upon an occurrence of significant non-compliance of laws or regulations, including damage to environment, safety and quality issues, malicious claims, intentional breach of contract and negative media coverage;
- **Post-performance assessment:** Conduct evaluation on our suppliers and subcontractors after completion of a procurement agreement or contract; and
- Annual assessment: Conduct evaluation on all of our suppliers and subcontractors at least once a year. Suppliers and subcontractors are rated base on their performance of our project, willingness to cooperate, occupational safety, environmental protection and significant safety and liability issues. If they failed the assessment, the suppliers and subcontractors would not be engaged on Group level.

B6: Product Responsibility

As a recognised public construction contractor, Kwan On is committed to providing quality and professional construction services to its customers. The Group strictly complies with laws and regulations on product responsibilities such as the "Competition Ordinance" and the "Personal Data (Privacy) Ordinance". We place emphasis on ethical standards and attach importance to the protection of privacy and intellectual property rights of our customers, employees, subcontractors and suppliers. During the Reporting Period, the Group did not have any cases of non-compliance of laws and regulations on health and safety, advertising, labelling and privacy matters relating to our products and services, nor did we receive any complaints from our customers or the public, or involve in any litigation related to health and safety matters of our construction. The Group's business does not involve any advertising activities and therefore our business operations do not expose to any significant risk related to advertising and labelling.

Project Quality Control

Kwan On has established "Quality Management Internal Auditing Standards" to enhance quality control and arranges regular site inspections by our project team, quantity surveyors, clients and consultants, as well as conducts monthly progress review meetings to ensure that our projects are completed on schedule and meets quality standards.

Protection of Customer Privacy

Kwan On attaches great importance to the confidentiality of personal and sensitive business data. With regard to the handling of important and confidential information, the Group has privacy protection management measures in place to ensure that only authorised personnel are allowed to handle confidential information. To protect the data of our suppliers, subcontractors, customers and the Group, we strictly prohibit our employees from carrying data storage equipment, maintenance equipment, portable storage devices or other information out of our offices without prior approval.

Customer Service

The Group believes in customer-oriented practices. We identify and review customer demands by collecting industry information, customer feedback and competitor intelligence. We also have a sound system and well-thought-out procedures to handle customer complaints properly and implement any appropriate improvement.

B7: Anti-corruption

Kwan On has zero tolerance against any business frauds such as corruption, offering or receiving bribe and money laundering. The Group strictly complies with anti-corruption and anti-bribery laws and regulations such as the "Prevention of Bribery Ordinance". During the Reporting Period, the Group was not involved in any legal cases related to corruption. In order to uphold our high standards of integrity and ethical business practices, our "Whistleblowing Policy" and "Employee Handbook" encourage employees to report and expose improper or illegal activities. Whistleblowers may report, verbally or in writing, any suspected misconduct to their own departments or the Group's senior management. To further emphasise the Group's commitment to corporate integrity, we encourage our management and employees of our quantity surveying department and procurement department to attend anti-corruption seminars organised by the Independent Commission Against Corruption on a regular basis to acquire knowledge about anti-corruption laws and situations that should be aware of in their daily routine and operations.

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B8: Community Investment

The Group believes that business is inseparable from the communities in which it operates. As a member of the community, Kwan On proactively invests resources in environmental protection, social services and education. The Group proactively minimises the impact of our business operations on the surrounding communities by setting up various effective communication channels such as providing our complain hotline numbers on the barriers of our sites for the public. In addition, Kwan On is committed to fulfilling its social responsibility by promoting a culture of using fewer straws through answering to the call of public campaigns such as the "No Straw Campaign" in order to protect our ecological environment. In addition, the Group actively communicates with non-governmental organizations and charities to understand the needs of the community. We also proactively participate in community activities to create a caring atmosphere in the neighbourhood and strive to promote harmony and prosperity in the community.