



**DTXS SILK ROAD INVESTMENT HOLDINGS
COMPANY LIMITED**

大唐西市絲路投資控股有限公司

(Incorporated in Bermuda with limited liability)

(Stock Code: 620)



2024

**ENVIRONMENTAL,
SOCIAL AND
GOVERNANCE REPORT**



Environmental, Social and Governance Report

1. ABOUT THIS REPORT

DTXS Silk Road Investment Holdings Company Limited (hereafter the “Company”) together with its subsidiaries, (collectively the “Group”) is pleased to present our Environmental, Social and Governance Report (“ESG Report”, or the “Report”) of the financial year 2024, with disclosure reference made to the ESG Reporting Guide as described in Appendix C2 of the Listing Rules. The Group has complied with all “comply or explain” provisions set out in the ESG Reporting Guide during the year ended 31 December 2024.

This Report presents the Group’s management approach and performance in both environmental and social aspects. Data and/or information disclosed in this report is derived from internal statistics and analysis. For the corporate governance structure and other relevant information of the Group, please refer to the Corporate Governance Report on page 26 to page 36 of our 2024 annual report.

1.1 Reporting Scope

This Report covers the Group’s overall environmental and social performances of its principal operations in property development, vineyard business, e-Commerce and supporting back-end operations, which specifically include:

- The e-Commerce division and supporting back-end operations at the Group’s head office in Hong Kong;
- The property development division in Xi’an, People’s Republic of China (“PRC”); and
- The vineyard business, a chateau operates in Bordeaux, France.

1.2 Reporting Period

The information published in this Report covers the period from 1 January 2024 to 31 December 2024 (“FY2024”), which is the same as the financial year covered in the Group’s annual report for the year ended 31 December 2024.

1.3 Reporting Principles

The preparation of the ESG Report has applied the following principles:

Materiality — Materiality assessments have been carried out to identify material environmental and social issues that have major impacts on investors and other stakeholders, the significant stakeholders, process, and results of the engagement of which are presented in the section headed “Stakeholder Engagement” in this Report. The Group also concerns ESG development outside and within the industry, fulfilling local standards as well as incorporating it into the strategic development plan of the Group.

Quantitative — Key Performance Indicators (“KPI”s) have been established, and are measurable and applicable to make valid comparisons under appropriate conditions; information on the standards, methodologies, assumptions, and/or calculation tools used, and sources of conversion factors used, have been disclosed when applicable.

Balance — The Group upholds this reporting principle to compile the Report and highlights both achievement and improvement areas of our ESG management to unbiasedly disclose the environmental and social performances in the Reporting Period with the support of pictures, charts and presentation formats whenever appropriate to present objective and transparent information and data for readers to make sound decisions and judgments.

Consistency — Consistent statistical methodologies and presentation of KPIs have been used to provide meaningful comparisons of related data to users of our reports over time.

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1.4 Feedback

The Group welcomes stakeholders' feedback on our ESG approach and performance. Stakeholders can give their suggestions or share their views with us via email to info@dtxs.com.

1.5 Content of this Report

This Report is released in both English and Chinese versions. Should there be any discrepancies between the English and Chinese versions, the English version shall prevail.

2. ESG MANAGEMENT

2.1 Board Statement

In recent years, there has been growing emphasis on sustainable development and social responsibility, with enterprises increasingly incorporating ESG factors into their core decisions. The Group is committed to developing sustainable approach and robust governance structure to effectively manage ESG issues throughout its business operations. Our ESG governance structure is composed of the Board, Hong Kong Headquarters, and the management and the functional departments of the Winery and Trading and Property Development Divisions.

The Board is responsible for sustainable development of the Group and guides the Group in its corporate social responsibility, including establishing, adopting, and reviewing the Group's environmental, social, and governance (ESG) vision, policies, and objectives, as well as evaluating, identifying, and addressing ESG-related risks at least once a year, and also reviewing, and approving the Group's annual ESG reports, and taking ultimate responsibility for the Group's ESG development. The Board believes that focusing on ESG management can improve our corporate reputation, reduce ESG risks and enhance the Group's ability to comply with relevant laws and regulations. These efforts can further enhance the Group's competitiveness and contribute to sustainable development of the Group's business.

The Hong Kong headquarters and management of two operations are accountable for supervising and guiding the implementation of the Group's sustainable development strategy and the preparation and disclosure of ESG reports. They also report regularly to the Board on the progress of ESG work to ensure its effectiveness. The functional departments within the Group are responsible for executing and implementing sustainable development policies and measures in their day-to-day operations. They report the progress of their ESG-related work to the Division Management and Hong Kong headquarters in timely manner.

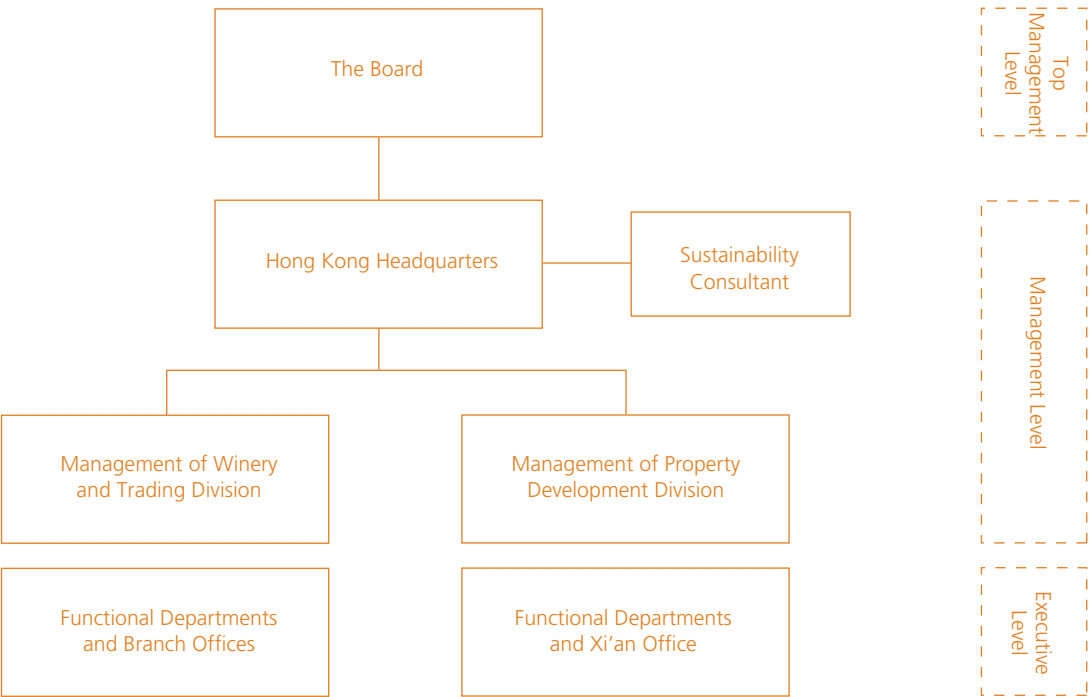
The Board has been consistently assessed the environmental, social and governance-related risks of extreme climate change and concluded that extreme climate change would have less impact on the arts and cultural division, and relatively high risk to the property development division and the winery business. For instance, the Board has identified that flooding and severe weather could slow down property constructions and reduce winery capacity. The Board has advised the management of the relevant property development and winery operation to raise awareness and plan initiatives to reduce the impact of extreme climate change on daily operations.

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The Group has been strived to promote electricity saving, increase the use of electronic publicity, increase the use of electronic communication and reduce the printing of documents in order to reduce environmental pollution.

The Board has been consistently complied with the Hong Kong Listing Rules, local regulations and codes, and different industry standards and management practices involved in the Group for conducting our daily business. It is also necessary to take the interests of various stakeholders (e.g. shareholders, employees, customers, suppliers, partners, etc.) into account and to consider social responsibility and the negative impact on the environment.

2.2 ESG Governance Structure



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2.3 Our Approach

The Group recognises its responsibility to be accountable to all its stakeholders, including government/regulatory authorities, shareholders/investors, employees, customers, suppliers, communities, media and public, etc. Understanding the needs and expectations of the stakeholders is the key to the Group's success. As each stakeholder may require different engagement approaches, we have established sound communication method in order to meet each stakeholder's expectations.

For the sake of striking a balance among business needs, social demands and environmental impacts, we are committed to continuously monitoring the risks and exploring opportunities existed in our daily operations, and embracing transparent corporate culture to ensure our sustainability strategies are well communicated to our employees, clients, the communities and other stakeholders.

To implement sustainability strategies to all levels of the Group, top down approach is adopted for execution and optimisation of the following sustainability strategies and targets:



2.4 Stakeholder Engagement

The Group understands that it is of paramount importance to recognise expectations and needs of various stakeholders and maintain constant communication with stakeholders. Aiming at continuously strengthen its environmental protection and social sustainability approach and performance by engaging and listening to both its internal and external stakeholders. Stakeholders are open to provide their feedback and freely express their expectations and concerns to the Group in the aspects of both environmental protection and social sustainability.

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2.4.1 Communication with Key Stakeholders

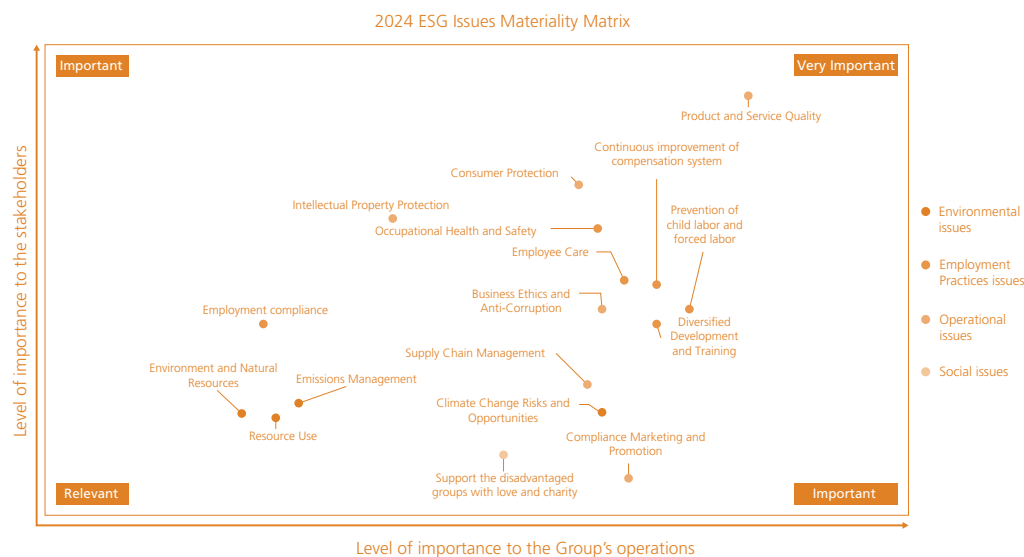
We recognise and incorporate stakeholders' expectations into our operations and ESG strategies by employing diverse communication channels and collaboration approaches and as shown in the table below.

Stakeholder	Communication channel	Demand and Expectation
Governments and regulatory authorities	<ul style="list-style-type: none"> — Daily communication and reporting — Forums and seminars — On-site investigations and inspections 	<ul style="list-style-type: none"> — Compliance operation — Risk management and internal control — Promoting employment — Supporting economic development — Tax payment
Senior management and the Board	<ul style="list-style-type: none"> — Board meetings — Daily communication and reporting 	<ul style="list-style-type: none"> — Compliance-based operation — Risk management and internal control — Operation performance
Employees	<ul style="list-style-type: none"> — Staff handbook — Regular job performance assessments — Training and seminars — Employee activities 	<ul style="list-style-type: none"> — Career development — Competitive salary and benefits — Equal opportunity for advancement — Healthy and safe working environment
Shareholders and investors	<ul style="list-style-type: none"> — Annual general meetings and other general meetings — Investor hotlines and emails — Financial reports, circulars, announcements and other public information — Company website 	<ul style="list-style-type: none"> — Operational risk control — Enterprise transparency — Protection of rights and interests
Customers	<ul style="list-style-type: none"> — Customer hotline and email — Customer satisfaction surveys — Daily communication 	<ul style="list-style-type: none"> — Customer service quality — Customer privacy security — Protecting customer rights and interests — Improving product and services quality — Compliance-based operation
Suppliers and partners	<ul style="list-style-type: none"> — Supplier initial and annual performance assessments — Business conferences — Phone and emails 	<ul style="list-style-type: none"> — Fair and open sourcing — Responsible supply chain management — Business ethics and reputation
Society and the public	<ul style="list-style-type: none"> — ESG reporting — Charitable activities and donations — Auctions and press conferences — Media interviews 	<ul style="list-style-type: none"> — Implementing green management — Open and transparent information — Supporting social welfare — Providing employment opportunity — Community coordinated development

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2.4.2 Materiality Assessment Survey

During the Reporting Period, the Group has engaged its senior management, shareholders, permanent frontline staff, suppliers, and clients through surveys to determine the material ESG aspects for this ESG Report. A materiality assessment has been carried out to show the topics that are important to the Group and its external stakeholders. Results from the survey are grouped into 17 major topics, which would allow the business to better identify any gaps between stakeholders' expectations and the business's efforts in addressing key issues. The following matrix shows the results from the stakeholder engagement.



Environmental	Employment Practices	Operational	Social
Climate Change Risks and Opportunities	Employment compliance	Business Ethics and Anti-Corruption	Support the disadvantaged groups with love and charity
Resource Use	Continuous improvement of compensation system	Intellectual Property Protection	
Emissions Management	Prevention of child labor and forced labor	Supply Chain Management	
Environment and Natural Resources	Employee Care	Product and Service Quality	
	Occupational Health and Safety	Consumer Protection	
	Diversified Development and Training	Compliance Marketing and Promotion	

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Through ongoing dialogues and materiality assessment during FY2024, the Group identified five material topics deemed as most important by internal and external stakeholders:

- Product and service quality
- Consumer protection
- Occupational health and safety
- Continuous improvement of compensation system
- Employee care

Management approaches of the identified key material issues are discussed in relevant sections below. The Group will continue to manage these key material aspects by establishing more policies and guidelines to further enhance the Group's ESG performance.

3. ENVIRONMENTAL

The Group is dedicated to achieving sustainable development by incorporating environmental concerns into its daily operations and business decision-making processes. Operating across Hong Kong, Mainland China, and France, we have taken multiple environmental management measures to prevent and reduce the potential impact on the environment in each of our business segments. Moreover, we ensure compliance with the relevant environmental laws and regulations in the areas where we operate, such as Air Pollution Control Ordinance (Cap.311), Waste Disposal Ordinance (Cap.354), Noise Control Ordinance (Cap.400) in Hong Kong, Environmental Protection Law of the People's Republic of China, Law on Prevention and Control of Air Pollution of the People's Republic of China, Law on Prevention and Control of Environmental Pollution Caused by Solid Waste, Water Pollution Prevention and Control Law of the People's Republic of China, Noise Pollution Prevention and Control Law of the People's Republic of China, Environmental Impact Assessment Law of the People's Republic of China and the Environmental Code in France.

The Group strictly comply with the Environmental Impact Assessment Law of the People's Republic of China, Law on the Management of the Environmental Inspection of Completed Construction Project and the relevant laws and regulations. Regarding the construction of the Silk Road International Culture Center project's office buildings (the "Project"), we have engaged independent professional agencies to evaluate the Project's environmental impact before and after the construction. We have carried out environmental protection acceptance work and the project was approved by the Xi'an Ecological Environment. Appropriate environmental protection measures are in place and approved by the local ecological environment department to reduce and eliminate its impact on the environment and the surrounding community.

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Environmental protection measures implemented in the second phase of the Project

Exhaust air	<ul style="list-style-type: none">• Installed mechanical exhaust ventilation equipment in the underground parking lot to collect and discharge vehicle exhaust air through exhaust pipes after treatment;• The backup power generator is equipped with smoke elimination facility and has low usage frequency, with exhaust air being discharged uniformly through smoke outlet.
Wastewater	<ul style="list-style-type: none">• Rainwater and sewage are separated by the pipe network within the community, and oil-water separators are uniformly installed. The generated sewage is treated by grease trap and septic tank before being discharged into the municipal sewage pipe;• Installed with water-recycling system, the recycled water is reused for watering plants, ground cleaning and public toilet flushing.
Noise	<ul style="list-style-type: none">• The construction of facilities such as water pump room, transformer substation, backup power generator room, fan room, and heat exchanger, which generate noise, are all located in the basement. The rooms are equipped with sound insulation, absorption, and elimination equipment to effectively reduce the impact of noise on the surrounding environment.
Solid wastes	<ul style="list-style-type: none">• Engaged property management company to implement centralized garbage collection measure, and handled by the local environmental sanitation department.

3.1 Air Emissions

For the fugitive dust generated during the construction, effective measures for controlling dust have been implemented by our project's main contractor at the construction site to minimize the creation of fugitive dust, such as water sprays, vehicle wheels washing, controlling on-site vehicle speed, etc.

For the air emissions generated from the consumption of fuel for the Group's mobile vehicles, the Group have implemented some measures to minimize fuel consumption during travel, we require drivers to plan their routes in advance and take the shortest and most efficient route to the destination. We also encourage communication through video, telephone conferences, electronic communication and other means to reduce greenhouse gas emissions. The consumption of petrol for use in the Group-owned passenger car contributed to the emission of 1.37 kg of nitrogen oxides ("NOx"), 0.27 kg of sulphur oxides ("SOx") and 0.10 kg of particulate matters ("PM").

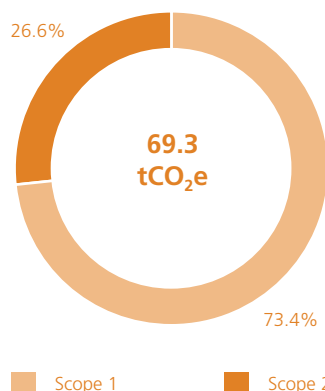
3.2 Greenhouse Gas ("GHG") Emissions

Greenhouse gases were generated from the use of electricity in Hong Kong Headquarters, branch offices, and the wine production site in France. Small amount of greenhouse gases and exhaust gases were generated from the use of Company's vehicles. The Group is committed to fulfil its responsibility to protect the environment from its business activities by reducing its carbon footprint and using resources effectively, and we encourage environmental protection by promoting awareness among our employees (Please refer to below section "Use of Resources" for details).

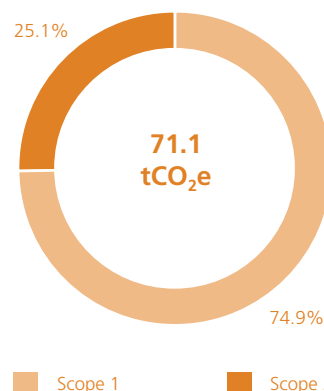
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During the Reporting Period, 47.6 tonnes of carbon dioxide equivalent (“tCO₂e”) GHG (mainly carbon dioxide, nitrous oxides and methane) were emitted from Group’s operations. The annual GHG emission intensity was 1.53 tCO₂e/HK\$million revenue (2023: 1.60 tCO₂e/HK\$million revenue).

The proportion of the Group’s 2024 GHG emissions



The proportion of the Group’s 2023 GHG emissions



Type of Greenhouse Gas Emissions	Sources of Greenhouse Gas Emissions	Unit	2024 Emission ^{3,4}	2023 Emission ^{3,4}	% Change
Scope 1 direct emissions ¹	Combustion of fuels in mobiles sources	tCO ₂ e	51.9	53.2	-2.4%
Scope 2 Indirect emissions ²	Purchased electricity	tCO ₂ e	17.4	17.9	-2.8%
Total		tCO ₂ e	69.3	71.1	-2.5%
Intensity		tCO ₂ e/HK\$million	1.53	1.60	-4.4%

Note 1: Calculation of scope 1 emission were made reference to Appendix C2 of the Main Board Listing Rules and their referred documentation as set out by Hong Kong Exchanges and Clearing Limited, unless stated otherwise.

Note 2: Calculation of scope 2 emission of HK operations were made reference to the CO₂e per electricity unit sold data disclosed in the “2024 HK Electric Investments Sustainability Report”, while the PRC operations were made reference to the national grid emission factors from the “Notice on Key Tasks for Managing Corporate Greenhouse Gas Emissions Reporting in 2023” published by the Ministry of Ecology and Environment of the People’s Republic of China and the France operations were made reference to the country level — Greenhouse gas emission intensity of electricity generation from European Environmental Agency. (2024: Emission factors: HK — 0.60kgCO₂e/kWh, PRC — 0.5703kgCO₂e/kWh, 2023: Emission factors: HK — 0.66kgCO₂e/kWh, PRC — 0.5703kgCO₂e/kWh, France — 0.067kgCO₂e/kWh)

Note 3: Scope 3 emissions generated from disposal of waste paper and electricity used for handling fresh water and sewage by the Hong Kong Water Supplies Department and Drainage Services Department are insignificant to overall emissions of the Group and were excluded in the report.

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Note 4: Since the reporting scope has added the winery operation, the calculation of intensity has changed from number of employee of the Group and floor size of Silk Road International Culture Center project built to Group's revenue of the year.

3.3 Hazardous Waste

During the Reporting Period, daily business operations of the Group had generated small amount of hazardous waste, such as batteries and light bulbs. However, since the amount of hazardous waste generated was insignificant, the Group had not kept records of the disposal of such items during the Reporting Period.

3.4 Non-hazardous Waste

The Group recognises that its business operations had generated non-hazardous waste, which mainly generated from the construction of the property development project and the daily office operations, which consisted of construction wastes, food waste and paper waste. Our project main contractor has formulated project waste management plan and implemented mitigation measures for handling the construction waste onsite, including waste material separation, waste reuse and recycling, in order to comply with local regulations. We have implemented Paperless Office Policy, encourage colleagues to communicate via email instead of paper documents, place recycling boxes next to photocopiers to collect single-sided paper for reuse, reuse stationery such as old envelopes, file folders, bring their own containers and use their own utensils, recycle cardboard boxes and other containers to minimize the generation of office wastes.

Since the amount of office wastes generated was insignificant, the Group had not kept records of the disposal of such items during the Reporting Period. Due to the management of the construction waste is under the responsibility of the contractors and absence of regular recording the amount of construction waste, the Group was unable to disclose any relevant waste data.

3.5 Emissions Mitigation Initiatives and Targets

The main source of emission was electricity consumption from daily office operations. Please refer to below section Use of Resources for electricity-saving measures that shall mitigate the Group's emissions.

The Group has set annual targets for GHG emissions, and the Group aims to achieve a 10% reduction in overall emissions intensity in 7 years, or by 2031.

3.6 Waste Reduction Initiatives and Targets

The Group has established waste management practices to reduce waste from daily business operations. One of the most effective ways is to reduce and reuse paper. The Group has implemented practices in which two-sided paper for printing and photocopying are set to default.

Paper with prints on one-side are reused by putting back to the paper recycling tray for staff to print non-essential documents. The Group also uses reusable envelopes when sending mail. This reduces the purchase of new virgin paper overall. Recycling bins for aluminium cans, toner, batteries, and newspaper are also installed in the office.

However, since the amount of waste generated by the Group was relatively insignificant, there was no target set regarding waste management.

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3.7 Environmental Compliance

During the Reporting Period, the Group did not note any cases of material non-compliance relating to air and greenhouse gas emissions, discharge into water and land, and the generation of hazardous and non-hazardous waste as required by the applicable laws and regulations.

4. USE OF RESOURCES

Due to the nature of the Group's business, our daily operations do not involve the use of significant amounts of natural resources, and therefore we have yet to develop the policies related to the efficient use of resource. However, the Board will review the Group's ESG performance and energy structure on annual basis. If significant changes occur, we will consider developing corresponding policies.

Nevertheless, the Group is committed to protecting the environment by enhancing operational efficiency to reduce energy and water consumption.

During the Reporting Period, the Group has complied with the relevant local laws and regulations related to use of resources which have significant impact on the Group or its business.

4.1 Energy

A total of 216,708 kWh of energy (2024: Direct energy consumption: 189,076 kWh, indirect energy consumption: 27,632 kWh, 2023: Direct energy consumption: 193,827 kWh, indirect energy consumption: 28,059 kWh) was consumed by the Group for its operations during the Reporting Period, which consisted of petrol for operating the Group's passenger vehicle and electricity for powering lighting, air-conditioning and other equipment of the Group necessary for its daily operations. The detailed breakdown of the Group's energy consumption is as follows:

Type of Energy	2024 Consumption	2023 Consumption
Electricity	27,632 kWh	28,059.00 kWh
Petrol	19,500 litres (equivalent to: 189,076 kWh)	20,000 litres (equivalent to: 193,827.32 kWh)
Diesel	—	—

The overall intensity¹ was 5,107 kWh/HK\$million revenue (2023: 4,987 kWh/HK\$million revenue).

Note:

- 1 Since the reporting scope has added the winery operation, the calculation of intensity has changed from number of employee of the Group and floor size of Silk Road International Culture Center project built to Group's revenue of the year.

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4.2 Water

The Group had seen minimal water consumption during the Reporting Period, and there was no issue in sourcing water during the Reporting Period.

During the Reporting Period, the water consumption¹ of the Group consumed 296 m³, with an intensity of 6.98 m³/HK\$million revenue.

Note:

- 1 Since the water meter of the Hong Kong headquarters is managed by the property management company and included in the property management fee, the Hong Kong operation has disclosed the drinking water consumption data.

4.3 Energy Use Efficiency Initiatives and Targets

Electricity usage contributes to most of the Group's GHG emissions. The Group has put effort in using energy more efficiently. For example, the Group has used T5 and LED for all lighting.

Starting from FY2019, an intelligent water dispensing machines with automatic electricity on-off feature has also been installed. Employees are also frequently reminded via email, printed notice and verbal promotion, to switch off air-conditioning, light switches and other electronic equipment after use.

The Group has set annual targets to reduce its electricity and energy consumption during operation and shall strive to keep on improving consumption efficiency. The Group aims to achieve a 10% reduction in overall energy use intensity in 7 years, or by 2031.

4.4. Packaging Materials

The use of package materials (e.g. cartons and paper products and glass wine bottles) mainly comes from our wine production and distribution business. We recycled packaging waste where possible and established a centralised recycling system for waste sorting and handling.

5. THE ENVIRONMENT AND NATURAL RESOURCES

The Group is committed to conducting its business responsibly, ensuring that its business does not contribute to significant adverse impact on the environment and society while bringing sustainable growth and profit.

5.1 Significant Impacts of Activities on the Environment

Prior to the development of real estate project, the Group strictly abides by the relevant national and local laws and regulations and engages environmental consultants to perform a comprehensive environmental impact assessment for our development project. This enables us to assess the potential impacts on biodiversity, ecology, water, and air, and develop corresponding mitigation measures to prevent, minimize, and control the adverse effects on the environment.

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6. CLIMATE CHANGE

Climate change poses a huge threat to all businesses, and that of the Group's is not an exception. The Group recognises that extreme weather events may negatively impact daily operations and has accordingly prepared contingency plans for these situations.

The Group identifies that climate change poses larger risk to property development division and vineyard division. Climate-related risks and impacts are identified as below:

Risk Type	Risk	Risk Description	Risk Impact
Transition Risk	Policy and Legal	Tightened requirements and regulations on property development in China	<ul style="list-style-type: none"> Increased capital expenditures in construction and operations Increased risk of non-compliance with stricter standards
		Implementation of carbon pricing	<ul style="list-style-type: none"> Increased capital expenditures in construction materials, fuel, electricity and waste management
		Stricter requirements and framework on disclosure	<ul style="list-style-type: none"> Increased capital expenditures to adopt the framework and requirement for disclosing climate risk and strategy Necessity to further implement sustainable and green facilities and strengthen data management
	Market	Increased expectation from stakeholders	<ul style="list-style-type: none"> Increase capital expenditures in providing detailed climate resilience strategy to gain confidence from stakeholders Potential negative impacts on share price if the efforts in climate risk disclosure could not meet investors' expectations
			<ul style="list-style-type: none"> Increased capital expenditures in construction and operations for the procurement of new technologies Decreased profitability due to increase in cost of sustainable materials
Physical Risk	Acute	Increased frequency and severity of extreme weather events such as typhoons and flooding	<ul style="list-style-type: none"> Increased capital expenditures for the implementation of climate mitigation and adaptation measures Supply chain disruption occurs more often, leading to shortage of key raw materials and escalated cost
	Chronic	Increase in average temperature and frequency of extreme hot days	<ul style="list-style-type: none"> Increased capital expenditures for the implementation of mitigation measures required As the frequency of power outage increased, the government implemented restrictions on energy usage which affected our daily operation

The Group has strictly followed all environmental-related rules and guidance from local and national authorities. However, the Group has yet to identify any opportunities which may arise from climate change.

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7. SOCIAL

7.1 Employment and Labour Practices

7.1.1 Employment

The Group believes that employees are valuable assets, and their continuous contributions and efforts are vital to the Group's success therefore the Group is committed to upholding an open, fair, just and reasonable human resource policy. The Group believes in providing pleasant, motivating and value-adding work environment that will lead to improved well-being for all employees, and long-term retention of its employees.

Employees are mainly located in Hong Kong and Mainland China, The Group has complied strictly with the relevant laws and regulations to ensure employees' interests are protected. See below for a list of employment laws and regulations of the respective regions the Group operate in:

Mainland China	Hong Kong	France
<ul style="list-style-type: none">• Labour Law• Labour Contract Law• Regulations on Paid Annual Leave for Employees• Law on the Protection of Women's Rights and Interests• Special Rules on the Labour Protection of Female Employees	<ul style="list-style-type: none">• Employment Ordinance (Cap. 57)• Inland Revenue Ordinance (Cap. 112)• Sex Discrimination Ordinance (Cap. 480)• Mandatory Provident Fund Schemes Ordinance (Cap. 485)• Personal Data (Privacy) Ordinance (Cap. 486)• Disability Discrimination Ordinance (Cap. 487)• Family Status Discrimination Ordinance (Cap. 527)• Race Discrimination Ordinance (Cap. 602)• Minimum Wage Ordinance (Cap. 608)	<ul style="list-style-type: none">• French Labour Code• Collective Bargaining Agreements• European Union Law• Case Law• Regulation on Anti-discrimination• Data Protection

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Employment Figures

As of 31 December 2024, the Group has a total of 93 employees across its offices in Hong Kong, Mainland China, and France. See below for the detail breakdown of the workforce for both financial year 2024 and 2023.

	Number of Employee		Employment Percentage	
	2024	2023	2024	2023
Employment type				
Full-time	73	74	78.49%	78.72%
Part-time	20	20	21.51%	21.28%
Employee category				
Senior Management	13	13	13.98%	13.83%
Middle Management	20	20	21.50%	21.28%
Frontline and Other Employees	60	61	64.52%	64.89%
Age group				
18–25	0	0	0%	0%
26–35	6	7	6.45%	7.45%
36–45	45	45	48.39%	47.87%
46–55	30	30	32.26%	31.91%
56 or above	12	12	12.90%	12.77%
Gender				
Male	48	49	51.61%	52.13%
Female	45	45	48.59%	47.87%
Region				
Mainland China	86	87	92.47%	92.55%
Hong Kong	3	3	3.23%	3.19%
Overseas	4	4	4.30%	4.26%

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Turnover Figures

A total of 6 employees left the Group during the Reporting Period, which gave a full time turnover rate of 6.5%. The Group regularly reviews salary remuneration and benefits to retain talents and stay attractive and competitive in the market. See below for the detail breakdown of turnover rate by employee group:

Turnover Rate as of 31 December	2024	2023
By Employment Type		
Full-time	8.22%	24.49%
Part-time	N/A	N/A
By Age Group		
18–25	N/A	N/A
26–35	66.66%	68.18%
36–45	4.44%	2.17%
46–55	0.00%	0.00%
56 or above	0.00%	0.00%
By Gender		
Male	10.42%	14.04%
Female	2.22%	4.26%
By Geographical Location		
Mainland China	5.81%	4.40%
Hong Kong	33.33%	66.67%
Overseas	0.00%	0.00%

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7.1.2 Employee Recruitment, Compensation and Benefits

To retain talent, the Group offers competitive remuneration packages and fringe benefits, corresponding to employees' experience, performance and job duties.

The Group's Employee Handbook and related regulations cover a wide range of practical systems, including the management system/procedures for the appointment of employees (including the employment of disabled persons), the remuneration/compensation/allowance/benefits of employees, the working hours, leave, performance, dismissal or termination of employees, etc. Consultants are appointed as the final approvers of the processes and systems to ensure the transparency and fairness of the systems to protect the interests of employees.

The Group is an equal opportunity employer. All employees are entitled to equal opportunities and fair treatment for their career development. All job applicants and existing employees are judged based on academics, personal achievements, individual performances.

Factors such as race, gender, age, religious belief, marital status, sexual orientation, or other status protected by law, are not used and considered for recruitment selection or promotion opportunities.

The Group has implemented a fair and open appraisal system to monitor and evaluate the performance of each employee with more than half a year of service at the beginning of each year.

The Employee Handbook clearly states the appraisal mechanism and grading. The appraisal is firstly done by each employee in the appraisal form for self-evaluation. Following the employee submits the appraisal form to the first appraiser for rating, the ratings are reviewed by the second appraiser to ensure that each employee is treated fairly. The mechanism helps the supervisor or department head to make an objective decision on each employee's performance and promotion opportunities.

The Group abides by all applicable employment and labour related laws of Hong Kong, Mainland China and France. The Group's employees are remunerated in accordance with their performance, qualification, work experience and prevailing industry practice. The Group offers a comprehensive benefits compensation and reimbursement policy for its employees.

For instance, meal allowance and transportation allowance are available for overtime work until 9pm on weekdays or over 8 hours on holidays. Expenses incurred for official functions can also be reimbursed. In addition, employees are entitled to meal and accommodation allowances for business trips, and the amount of the allowances is clearly defined according to the destination of the trip.

There were no major changes in policies relating to compensation and dismissal, recruitment and promotion, working hours, rest periods, equal opportunities, diversity and anti-discrimination during the Reporting Period.

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7.1.3 Employee Communication

The Group held group birthday party for employees. These activities are in the spirit of caring for employees, strengthening cohesion and communication among employees, and creating a warm and harmonious working atmosphere.

7.1.4 Equal Opportunity and Anti-Discrimination

The Group attaches particular importance to equal employment opportunities and comply strictly with anti-discrimination laws. In support of equal employment opportunities, the Group adopts fair and open recruitment mechanism with all positions being openly recruited regardless of age, gender, race, nationality, religion, marital status or disability.

7.2 Employee Health and Safety

The Group upholds the belief that employee's safety is the first priority in our workplace. The Group is committed to providing a healthy and safe working environment for all our employees. To ensure employees are in healthy condition, air purifiers and plants are installed wherever appropriate in the office. Furthermore, the Group has purchased employee medical compensation for all its employees, which includes a free annual medical check-up and dental insurance.

In addition, the Group participates in fire/emergency evacuation drills organised by the tenant on a regular basis, which raises employee awareness and responsiveness in case of a fire emergency. The Group has also purchased several types of insurances to cover for employees in case of unforeseeable accidents. This includes Fire and Office insurance and traveling insurance for employees who required business travelling.

Case study

Sympathy Programme

During the Spring Festival, the Group carried out a sympathy programme for employees in difficulty. It shows humanistic care and support to the employees. The Group's management and human resources department visited employees at home in need and presented them with festive gifts, demonstrating the Group's core values which are mutually beneficial relationship with employees and emphasis on the physical and mental health of employees.

During the Reporting Period, the Group has complied with occupational health related laws and regulations to avoid any health risks from being imposed onto its employees. See below for a list of occupational health related laws and regulations of the respective regions the Group operate in:

Mainland China	Hong Kong	France
<ul style="list-style-type: none">• Labour Law• Labour Contract Law• PRC Law on The Prevention and Control of Occupational Diseases	<ul style="list-style-type: none">• Employees' Compensation Ordinance (Cap. 282)• Occupational Safety and Health Ordinance (Cap. 509)	<ul style="list-style-type: none">• French Labour Code• Occupational Health and Safety Act

There were no major changes in management practice in relation to occupational health and safety during the Reporting Period.

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Work-related fatalities and injury

Occupational Health and Safety Data	
Work related fatality	2024: 0 2023: 0 2022: 0
Fatality rate	0.00%
Work injury cases > 3 days	0
Work injury cases ≤ 3 days	0
Lost days due to work injury	0

During the Reporting Period, no complaints or lawsuits were received by the Group regarding violations of health and safety-related laws.

7.3 Development and Training

The Group considers the skills and knowledge of its employees a vital importance to the Group’s growth. The Group believes in creating a workplace that can foster growth by providing training opportunities for its employees to enhance their working capabilities and management competence. By doing so, employees are sponsored to take continuous professional development (CPD) trainings provided by professional bodies.

The Group puts emphasis on employees’ knowledge and ability and provides on-the-job in-house training to enable them to perform their job and enhance competitiveness to meet the Group’s needs. Training that the Group provides can be categorised as follows:

- Induction training: orientation training provided to new staff that covers policies and procedures of the Group, OHS and firefighting, position-related knowledge and skills, etc.
- Professional and technical training: training on professional skills and knowledge (such as new laws and regulations, etc.)
- Occupational health and safety: provided as part of the induction training and regular refresh sessions, topics are tailored to meet employees’ needs

The Group is committed to collaborating with various organisations to provide a comprehensive range of training for its employees to continuously enhance their skills, physical and mental well-being in various aspects.

Apart from focusing on training and sustainable development for current employees, the Group has also established a comprehensive and fair recruitment policy for fresh graduates, namely as the Management Trainee Development Programme. The programme aims to build and improve the talent pipeline for the Group’s development, as well as enhance the Group’s innovation, marketing and management capabilities, The Group believes that the programme is able to bring a competitive advantage.

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Case study

Management Trainee Development Programme

The training cycle is divided into two phases, a rotational internship period and a fixed-term placement period.

The rotational internship period is 6 months. During the first 3-month rotational internship period, trainees are assigned to two or three departments based on their academic background and the needs of each department. After the completion of the rotational internship, they will be assigned to the department of their choice according to the personal wishes and their performances, for another 3-month trial period.

After the rotational period, trainees will enter into a fixed-term training period, in which the department head and the human resources department will formulate a fixed-term training plan, trainees' major and personality characteristics will be considered as well.

The Group believes that after a comprehensive and systematic training, the management trainees will become qualified employees with skills and capable of taking up job responsibilities independently, in turns providing reserve talent resources for the development of the Group, so as to achieve the Group's talent strategy of reserving and developing talents.

During the Reporting Period, 63 employees, or 67.74% of all employees, received training as arranged by the Group, and the average training hours that each employee (inclusive of employees who did not receive training or have left the Group) received was 0.5 hours. The percentage and average training hours per gender and employee category (inclusive of employees who did not receive training or have left the Group) during the Reporting Period are as follows:

	Percentage		Average Training Hours	
	2024	2023	2024	2023
By Gender				
Female	71.11%	64.44%	0.63 hrs	0.41 hrs
Male	66.66%	65.31%	0.54 hrs	0.38 hrs
By Employee Category				
Senior Management	0.00%	0.00%	0 hrs	0 hrs
Middle Management	55.00%	65.00%	0.83 hrs	0.92 hrs
Frontline and Other Employees	86.66%	100%	0.32 hrs	0.18 hrs

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7.4 Labour Standards

The Group fully complies with the relevant labour laws legislation from local governments that prohibits child labour and forced labour. See below for a list of labour standard related laws and regulations of the respective regions the Group operate in:

Mainland China	Hong Kong	France
<ul style="list-style-type: none">• PRC Law on Protection of Minors	<ul style="list-style-type: none">• The Employment of Children Regulations under the Employment Ordinance (Cap. 57)	<ul style="list-style-type: none">• Defender of Rights of the Child• Child Labour Laws of 1841 and 1874

The Group ensures new recruits are valid for working by cross checking on the personal information written on resumes, to the personal information in valid identification and/or working visas during the recruitment process. Any form of child labour, illegal workers and/or forced labour are strictly prohibited in the Group's business operations.

During the Reporting Period, the Group has not been notified of any violation of laws and regulations on employee discrimination, anti-child-labour, and forced-labour.

8. OPERATING PRACTICES

8.1 Supply Chain Management

The Group's primary operation revolves around back-office works, property development, vineyard business and general information technology operations. Thus, the required supplies fall into several categories, including office supplies, materials and services related to the operation of the vineyard and the production of wine, information technology, communications and utilities.

For the Group's supply chain practice, mechanisms have been implemented to ensure principled and practical purchasing of supplies. For instance, proper segregation of duties are in place when ordering supplies. The person initiating the purchase must be reviewed by another person, usually his/her supervisor. For any single purchase over HK\$100,000, an approval by the executive vice chairman of the Group is necessary. In addition, when an employee wishes to order supplies, an evaluation will be made by the human resources department to determine if it is necessary or not with the purchase order. In addition, employees dealing with suppliers and contractors are required to declare any conflict of interest, and communication channels are in place so that any concerns about suspected misconduct, malpractice or impropriety could be raised confidentially.

To align with the Group's stance on protecting the environment, supplies are purchased locally to minimise excess emissions from shipping logistics, and will purchase certified with environmental labels (e.g. PEFC certified paper) whenever possible. In addition, the Group heavily promotes the re-use of supplies to minimise unnecessary purchasing and waste.

Procurement and resources management processes are continuously being monitored and properly documented. The Group has established supply chain management system to ensure only suppliers that are able to provide qualified services and products and adhere to the relevant environmental and safety protections standards are selected.

During the Reporting Period, the Group cooperated with 25 suppliers (Mainland China: 5, Hong Kong: 18, overseas: 2).

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8.2 Product Responsibility

In terms of regulating product promotion and responsible sales, the Group strictly abides by the relevant laws and regulations. See below for a list of relevant laws and regulations of the respective regions the Group operate in:

Mainland China	Hong Kong	France
<ul style="list-style-type: none">• Criminal Law• Advertising Law• Cyber Security Law• Provisions on Protecting the Personal Information of Telecommunications and Internet Users	<ul style="list-style-type: none">• Personal Data (Privacy) Ordinance (Cap. 486)• Office of the Privacy Commission for Personal Data, Hong Kong• Trade Marks Ordinance (Cap. 559)• Patents Ordinance (Cap. 514)• Copyright Ordinance (Cap. 528)	<ul style="list-style-type: none">• Product Liability (Article 1245 of French Civil Code)• Consumer Code

In terms of the health and safety, advertising, labelling and privacy matters and remedies of the products and services provided, there was no material non-compliance with relevant laws and regulations that would have significant impact on the Group during the Reporting Period. In addition, there had been no products sold or shipped subject to recalls for safety and health reasons during the Reporting Period.

8.2.1 Intellectual Property Rights

Any assets of the Group, including materials and information for official purposes, shall not be taken or copied for personal purposes without authorisation. Such violation is an offence under the laws of Hong Kong, and offenders will be subject to disciplinary action or prosecution. The Group does not allow any infringement of its assets and intellectual property rights, and will take appropriate disciplinary actions against offenders.

During the Reporting Period, the Group was not aware of any dispute or infringement by (i) the Group of any intellectual property rights owned by third parties; or (ii) any third parties of any intellectual property rights owned or being applied by the Group.

8.2.2 Quality Assurance

The Group is committed to consistently provide high quality products and services that are in accordance with the requirement of its customers.

During the Reporting Period, there were no material complaints made against the Group. The Group has complied with relevant laws and regulations in relation to product and service liabilities.

8.2.3 Confidential Information, Data Protection, and Privacy

The Group's e-Commerce division, namely eSilkTrade, is a business-to-business platform on information for cross-border trading of wine, cosmetics, electronics, while also integrating with suppliers, buyers, and logistic service providers. The business and operation are based focused in Hong Kong. Due to the nature of e-Commerce, the Group is committed to protecting the privacy of its customers, employees, business partners and suppliers by maintaining a safe and secure data environment.



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The Group adopts the following principles regarding data and security:

- The platform only collects relevant company information that is required for communication. Clients shall not be requested for any personal information
- The Group does not share personal data to any organization and/or business that is not a member of its platform
- The website and all data are encrypted to protect against unauthorised access to company information
- The Group's computer system is regularly updated to avoid any possible hackers' activities

The Group also established a clear data security and information privacy policy set out in the Employee Handbook for employees. The policy covers 7 major areas including computer use, email use, backup and recovery, physical security, password management, departing employees and others.

Following are some of principles extracted from Employee Handbook:

- Employees using company laptops outside of the office should use VPN to connect to the Company's internal system
- All server files are backed up by the administration and human resources department twice a day and fully backed up at the end of the week
- Fingerprint or face recognition access control systems are in place for all entrances and exits
- Staff server and email login passwords are required to update every 90 days
- The use of any Internet tools (including official document flow system, confidential mailbox, WhatsApp, WeChat, QQ, etc.) to transmit confidential information is strictly prohibited

During the Reporting Period, the Company had not received complaints or litigations relating to data protection and privacy protection, there were no incidents and complaints concerning breaches of customer privacy or losses of customer data for the Group.

8.3 Anti-Corruption

The Group strictly prohibits any corruption and bribery activities that compromise the interest of its shareholders, investors, customers, and other stakeholders. The Group complies with the law and regulation regarding bribery, extortion, fraud and money laundering as stipulated in the Prevention of Bribery Ordinance. Employees at all levels are expected to behave with integrity, impartiality and ethically. We have zero tolerance on any forms of bribery, corruption and fraud.

The Group has established and implemented anti-corrupting measures. Anti-bribery policies are clearly stated in the staff handbook. We have also established a prevention system, which sets up relevant whistle-blowing procedures by setting up a private communication channel on reporting suspicious fraudulent actions to the Group's management directly.

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The conduct of employee is closely monitored by management in preventing corruption. We conduct reviews on the effectiveness of the internal control systems, as well as providing training to employees on anti-corruption on a timely basis.

During the Reporting Period, the Group did not receive any non-compliance with relevant laws and regulations on anti-corruption.

Anti-corruption Training

Anti-corruption training is pivotal to raising employees' awareness and maintaining a culture of integrity throughout the Group. During the Reporting Period, the Group organised anti-corruption training for its employees located in Hong Kong. Anti-corruption training topics include anti-corruption laws and regulations, case studies, identifying bribery and corruption, whistleblowing, and business ethics.

The Group provided anti-corruption training to directors and employees on the following topics:

- Integrity and governance roles of senior management
- Appropriate assessments and common integrity risks
- Evidence-based insight and compliance with regulations
- Case Studies — "Ethics Legacy"
- bribery and cross-border corruption
- Conflicts of Interest and Other Related Malpractices
- Internal controls and risk management
- Integrity Roles and Responsibilities of Company Directors
- Practicing what you preach — building a culture of integrity
- Help is at hand — ICAC services

9. COMMUNITY

9.1 Community Investment

As a responsible company, the Group understands the importance for making positive contribution towards the community where it operates.

The Group continues to support the disadvantaged community in ways that is suitable for its business operations, such as purchasing environmentally friendly stationaries from a stationary store operated by a disabled owner as one of its methods for social responsibility. The Group also strongly encourages its employees to locate and source supplies from social enterprises whenever possible as well.

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10. ESG REPORTING GUIDE INDEX

KPIs	Reporting Section
Environmental	
A1: Emissions	
General Disclosure (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to air and greenhouse gas emissions, discharges into water and land, and generation of hazardous and non-hazardous waste.	3. Environmental 3.7 Environmental Compliance
A1.1 The types of emissions and respective emissions data.	3.1 Air Emissions
A1.2 Direct (Scope 1) and energy indirect (Scope 2) greenhouse gas emissions and intensity.	3.2 Greenhouse Gas Emissions
A1.3 Total hazardous waste produced and intensity.	The amount of hazardous waste generated was insignificant, the Group had not kept records of the disposal of such items during the Reporting Period. The amount of office waste generated by the Group is not significant, the Group did not record the disposal of such items during the reporting period.
A1.4 Total non-hazardous waste produced and intensity.	The contractor is responsible for the management of construction waste, and the amount of construction waste has not been regularly recorded, the Group is temporarily unable to disclose any relevant waste information.
A1.5 Description of emissions target(s) set and steps taken to achieve them.	3.5 Emissions Mitigation Initiatives and Targets
A1.6 Description of how hazardous and non-hazardous wastes are handled, and a description of reduction target(s) set and steps taken to achieve them.	Since the amount of waste generated by the Group was relatively insignificant, there was no target set regarding waste management.

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KPIs	Reporting Section
A2: Use of Resources	
General Disclosure	
Policies on the efficient use of resources, including energy, water and other raw materials. Resources may be used in production, in storage, transportation, in buildings, electronic equipment, etc.	4. Use of Resources
A2.1 Direct and/or indirect energy consumption by type (e.g. electricity, gas or oil) in total and intensity.	4.1 Energy
A2.2 Water consumption in total and intensity.	4.2 Water
A2.3 Description of energy use efficiency target(s) set and steps taken to achieve them.	4.3 Energy Use Efficiency Initiatives and Targets
A2.4 Description of whether there is any issue in sourcing water that is fit for purpose, water efficiency target(s) set and steps taken to achieve them.	4.4 Water (Remarks: The Group has not set any targets for water consumption reduction due to its minimal impacts.)
A2.5 Total packaging material used for finished products (in tonnes) and, if applicable, with reference to per unit produced.	4.5 Packaging Materials
A3: The Environment and Natural Resources	
General Disclosure	
Policies on minimising the issuer's significant impacts on the environment and natural resources.	5. The Environment and Natural Resources
A3.1 Description of the significant impacts of activities on the environment and natural resources and the actions taken to manage them.	5.1 Significant Impacts of Activities on the Environment
A4: Climate Change	
General Disclosure	
Policies on identification and mitigation of significant climate-related issues which have impacted, and those which may impact, the issuer.	6. Climate Change
A4.1 Description of the significant climate-related issues which have impacted, and those which may impact, the issuer, and the actions taken to manage them.	6. Climate Change
Social	
B1: Employment	
General Disclosure	
(a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to compensation and dismissal, recruitment and promotion, working hours, rest periods, equal opportunity, diversity, anti-discrimination, and other benefits and welfare.	7.1 Employment and Labour Practices
B1.1 Total workforce by gender, employment type, age group and geographical region.	7.1.1 Employment
B1.2 Employee turnover rate by gender, age group and geographical region.	7.1.1 Employment

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KPIs		Reporting Section
B2: Health and Safety		
General Disclosure		
(a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to providing a safe working environment and protecting employees from occupational hazards.	7.2	Employee Health and Safety
B2.1 Number and rate of work-related fatalities occurred in each of the past three years including the reporting year.	7.2	Employee Health and Safety
B2.2 Lost days due to work injury.	7.2	Employee Health and Safety
B2.3 Description of occupational health and safety measures adopted, and how they are implemented and monitored.	7.2	Employee Health and Safety
B3: Development and Training		
General Disclosure		
Policies on improving employees' knowledge and skills for discharging duties at work. Description of training activities	7.3	Development and Training
B3.1 The percentage of employees trained by gender and employee category.	7.3	Development and Training
B3.2 The average training hours completed per employee by gender and employee category.	7.3	Development and Training
B4: Labour Standards		
General Disclosure		
(a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to preventing child and forced labour.	7.4	Labour Standards
B4.1 Description of measures to review employment practices to avoid child and forced labour.	7.4	Labour Standards
B4.2 Description of steps taken to eliminate such practices when discovered.	7.4	Labour Standards
B5: Supply Chain Management		
General Disclosure		
Policies on managing environmental and social risks of the supply chain.	8.1	Supply Chain Management
B5.1 Number of suppliers by geographical region.	8.1	Supply Chain Management
B5.2 Description of practices relating to engaging suppliers, number of suppliers where the practices are being implemented, and how they are implemented and monitored.	8.1	Supply Chain Management
B5.3 Description of practices used to identify environmental and social risks along the supply chain, and how they are implemented and monitored.	8.1	Supply Chain Management
B5.4 Description of practices used to promote environmentally preferable products and services when selecting suppliers, and how they are implemented and monitored.	8.1	Supply Chain Management

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KPIs	Reporting Section
B6: Product Responsibility	
General Disclosure (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to health and safety, advertising, labelling and privacy matters relating to products and services provided and methods of redress.	8.2 Product Responsibility
B6.1 Percentage of total products sold or shipped subject to recalls for safety and health reasons.	8.2 Product Responsibility
B6.2 Number of products and service-related complaints received and how they are dealt with.	8.2 Product Responsibility
B6.3 Description of practices relating to observing and protecting intellectual property rights.	8.2.1 Intellectual Property Rights
B6.4 Description of quality assurance process and recall procedures.	8.2.2 Quality Assurance
B6.5 Description of consumer data protection and privacy policies, and how they are implemented and monitored.	8.2.3 Confidential Information, Data Protection, and Privacy
B7: Anti-corruption	
General Disclosure (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to bribery, extortion, fraud and money laundering.	8.3 Anti-Corruption
B7.1 Number of concluded legal cases regarding corrupt practices brought against the issuer or its employees during the reporting period and the outcomes of the cases.	8.3 Anti-Corruption
B7.2 Description of preventive measures and whistle-blowing procedures, and how they are implemented and monitored.	8.3 Anti-Corruption
B7.3 Description of anti-corruption training provided to directors and staff.	8.3 Anti-Corruption
B8: Community Investment	
General Disclosure Policies on community engagement to understand the needs of the communities where the issuer operates and to ensure its activities take into consideration the communities' interests.	9. Community
B8.1 Focus areas of contribution (e.g. education, environmental concerns, labour needs, health, culture, sport).	9. Community
B8.2 Resources contributed (e.g. money or time) to the focus area.	9. Community