

鎳資源國際控股有限公司

NICKEL RESOURCES INTERNATIONAL
HOLDINGS COMPANY LIMITED

(incorporated in the Cayman Islands with limited liability)

(於開曼群島註冊成立之有限公司)

Stock code 股份代號：2889

新時代 新鋼鐵 新生活

2018

ENVIRONMENTAL, SOCIAL
AND GOVERNANCE REPORT

環境、社會及管治報告

Environmental, Social and Governance Report

環境、社會及管治報告

CONTENTS

目錄

PAGE

頁次

I. INTRODUCTION

I. 引言

2

II. REPORTING PERIOD AND REPORTING SCOPE

II. 報告時期及報告範圍

2

III. BOARD INCLUSIVENESS

III. 董事會參與

3

IV. STAKEHOLDER ENGAGEMENT

IV. 持份者的參與

3

V. ENVIRONMENTAL SUSTAINABILITY

V. 環境可持續發展

11

VI. SOCIAL SUSTAINABILITY

VI. 社會可持續發展

22

VII. REPORT DISCLOSURE INDEX

VII. 報告披露索引

37

Environmental, Social and Governance Report

環境、社會及管治報告

I. INTRODUCTION

Nickel Resources International Holdings Company Limited was established in 1993 and is mainly engaged in the business of special steel manufacturing. As a leading non stated-owned enterprise in special steel industry in Mainland China, Nickel Resources International Holdings Company Limited (the "Company") and its subsidiaries (collectively, the "Group") proactively fulfills its environmental and social responsibilities.

The Group not only is committed to the business expansion and economic development, but also has put great efforts into environmental protection and fulfilment of its social responsibility. With a strong ambition and commitment to forge an eco-friendly, resilient and reliable enterprise that pioneers in sustainable development compared to its peers in the industry, the Group never stops its footstep in exploring new ways to change its business model and operating practice in order to make contributions to addressing the pressing global climate change-related challenge.

The Group is pleased to present its ESG Report for the third year to demonstrate the Group's approach and performance in terms of sustainable development for the financial year ended on 31 December 2018 ("financial year 2018"). This ESG report is prepared in compliance with the ESG Reporting Guide as set out in Appendix 27 to the Rules Governing the Listing of Securities on The Stock Exchange of Hong Kong Limited. The Group referenced recommendations of the Task Force on Climate-related Financial Disclosures to improve the integrity, international compatibility and industrial comparability of the report.

II. REPORTING PERIOD AND REPORTING SCOPE

This Report covers the Group's head office in Hong Kong and the administrative office and factory for special steel manufacturing in Henan Province in the People's Republic of China. The period covered by the ESG Report is the financial year 2018 from 1 January 2018 to 31 December 2018 and will be published on the website of the Group ir.nickelholdings.com.

I. 引言

鎳資源國際控股有限公司成立於1993年，主要從事特殊鋼的製造業務。作為中國內地非國有特殊鋼製造的龍頭企業，鎳資源國際控股有限公司（簡稱「公司」）及其子公司（統稱「本集團」）積極履行其環境和社會責任。

本集團不僅專注於業務擴展及經濟發展，同時也在環境保護和社會責任方面也傾注了大量心血。本集團有著強烈的信心並致力於打造在可持續發展方面領先於行業的環保、可靠的企業。本集團在尋求新的商業模式和運營方式以應對全球氣候變化相關的挑戰的路上從未停下過腳步。

本集團欣然呈列其第三年環境、社會與管治報告，以闡述其於截至二零一八年十二月三十一日止財政年度（「二零一八財政年度」）在可持續發展方面的方針及表現。本環境、社會及管治報告乃遵照香港聯合交易所有限公司證券上市規則附錄二十七所載的《環境、社會及管治報告指引》編製。為了提供國際認可的環境社會及管治報告，本集團參考了氣候相關金融披露工作組的建議，以提高報告的完整性、國際相容性及行業可比性。

II. 報告時期及報告範圍

本報告涵蓋本集團於香港的總部辦公室和位於中國河南省從事特鋼製造業務的行政辦公室及工廠。本報告涵蓋時期為二零一八財年，即由二零一八年一月一日起至二零一八年十二月三十一日止，並發佈於集團網頁 ir.nickelholdings.com 上。

Environmental, Social and Governance Report

環境、社會及管治報告

III. BOARD INCLUSIVENESS

The Group has developed its internal strategies and policies with aims to create sustainable values to its stakeholders, thereby to large extent minimising the Group's undue impact on the environment. In order to carry out the Group's sustainability strategy from top to bottom, the Board of Directors ("Board") has ultimate responsibilities for ensuring the effectiveness of the Group's environmental, social and governance policies.

In order to fully implement the sustainable development strategy, the Company has established dedicated teams to manage environmental, social and governance ("ESG") issues. The Group has established a sustainable development strategy to create sustainable value and continuously reduce the Group's environmental impact. Dedicated personnel have been assigned to enforce and supervise the implementation of the relevant policies.

With the forward-looking guidance and well-designed plans of action to address underlying ESG matters, the management and responsible teams keep reviewing and adjusting the Group's sustainability policies to satisfy the ever-changing needs of its stakeholders. Through its established accountability system, the Group is committed to improving its performance in ESG management while maintaining its competitive edges in the industry.

IV. STAKEHOLDER ENGAGEMENT

The Group also strives to achieve high ESG standards. This not only strengthens its reputation as a caring company willing to fulfil social responsibility, but also enhances the corporate value of the Company. Therefore, effective communication with internal and external stakeholders is deemed critical to the Group, through which, the Group is able to not only pass on its determination to create long-term value for its stakeholders, but also can develop a better understanding of the topics of its stakeholders' concern. The Group is committed to reviewing and adjusting its sustainable development policies on a regular basis to satisfy the ever-changing needs of its stakeholders.

III. 董事會參與

本集團已制定內部政策，旨在為利益相關者創造可持續價值，從而減少本集團對環境的不良影響。為了由上至下貫徹實行可持續性發展策略，董事會確保本集團所出臺的環境、社會及管治政策的效力，並對其負全部責任。

為了全面貫徹實行持續性發展策略，本公司已設立專業團隊管理環境、社會及管治（「ESG」）的相關事項。本集團已建立可持續發展戰略，創造可持續價值，並持續降低本集團對環境的影響。有關工作人員被任命強制執行相關政策並加以監督。

通過前瞻性的策略和精心設計的行動計畫來解決潛在的ESG問題，管理層和負責團隊不斷審查和調整集團的可持續發展政策，以滿足持份者不斷變化的需求。通過建立責任追溯制度，本集團致力於提升ESG管理的表現同時維持行業內的競爭力。

IV. 持份者的參與

本集團亦致力達致高水準之環境、社會及管治，藉此提高本集團關愛社會且勇於承擔的聲譽，同時提升本公司企業價值。因此與內部及外部持份者的有效溝通被認為對集團來說至關重要。有效溝通不僅能夠傳達集團為持份者創造長期價值的決心，也能使集團更好地瞭解持份者所關心的議題。本集團經常性地回顧與調整集團的可持續性政策以滿足不斷變化的持份者要求。

Environmental, Social and Governance Report

環境、社會及管治報告

Fostering a meaningful relationship with all stakeholders has been viewed as the premise of effective communications and the realisation of the Group's vision of valuation creation for all. As such, the Group relies on its good citizenship awareness, reputational influence and great capability in coordination, and has built a sound relationship with its stakeholders including policy-makers, regulators, investors, customers and suppliers. Through a broad range of open communication channels, the Group successfully gained a deeper understanding of its stakeholders' genuine concerns and expectations during recent years, which facilitated the Group to better position itself in the competitive market and to make a rapid and accurate strategic adjustment.

In order to strengthen corporate sustainability management while enhancing stakeholders' awareness of ESG and sustainability issues, the Group has put tremendous efforts into its internal and external stakeholder engagement. During the year under review, the Group carefully evaluated its stakeholders' opinions on corporate sustainable development, especially the material ESG topics and United Nations Sustainable Development Goals (SDGs) from their perspectives, and committed to resolving the problems in a proper manner based on continuous, concise and effective communications. With the survey initiated by an external sustainability consultancy agency, the Group hopes to achieve three goals:

- Depict a comprehensive and objective picture of stakeholders' concerns in the path of the Group's long-term sustainable development;
- Capture potential business opportunities by addressing climate-related risks and crisis to people by innovation and optimisation of the entire operational process;
- Clarify a shared value between the Group and investors through ESG requirements and SDGs commitment.

與持份者建立有意義的關係被視為有效溝通和實現集團為所有人創造價值的願景的前提。因此，本集團依賴其良好的企業公民意識，聲譽影響力及強大的協調能力，並與包括政策制定者、監管機構、投資者、客戶及供應商在內的持份者建立了良好關係。通過廣泛的開放式溝通渠道，本集團近年來深入了解持份者的真實關注和期望，促進本集團更好地在競爭激烈的市場中定位，並進行快速準確的戰略調整。

為了加強可持續發展管理，同時提高持份者對ESG和可持續發展問題的認識，本集團已為其內部和外部持份者參與做出了巨大努力。於回顧年度內，本集團從其角度仔細評估其持份者對企業可持續發展的意見，特別是ESG主題和聯合國可持續發展目標(SDGs)，致力於在持續、簡潔和有效的溝通基礎上以適當的方式解決問題。通過外部可持續發展諮詢機構發起的調查，本集團希望實現三個目標：

- 描繪在集團長期可持續發展的道路全面客觀的持份者關注事項；
- 通過創新和優化整個運營流程，解決與氣候相關的風險和危機，抓住潛在的商機；
- 通過ESG要求和SDG明確集團與投資者之間共同利益。

Environmental, Social and Governance Report

環境、社會及管治報告

To realize the Group's objectives in terms of sustainable development and achievement, the Group highly values the opinions from internal and external stakeholders. For these purposes, while proactively collecting feedback from stakeholders, the Group has established and maintained mutual trust and support with stakeholders. The contact between the Group and stakeholders is mainly achieved through the communication channels as set out in the table below.

為了實現本集團在可持續性發展和業績上的目標，本集團高度重視內部和外部持份者的意見。為此，本集團積極收集持份者的回饋意見，並與各持份者建立和保持相互信任和相互支持的關係。本集團主要通過下表所列出的溝通渠道與利益相關方建立聯繫。

Category of Stakeholders 持份者類別	Expectations and Care 期望和關切	Communication Channels 溝通管道
Governments and Management Authorities 政府和管理機構	<ul style="list-style-type: none"> – Compliance with Laws and Regulations – Corporate Sustainability – 遵守法律和法規 – 企業可持續發展 	<ul style="list-style-type: none"> – Compliance with local laws and Regulations – Regular report and tax payment – 遵守當地法律法規 – 常規報告和支付稅款
Shareholders 股東	<ul style="list-style-type: none"> – Return on investment – Corporate governance – Business compliance – 投資回報 – 企業管治 – 業務合規 	<ul style="list-style-type: none"> – Corporate reports and announcements – General meetings – Company official website – 企業報告和公告 – 股東大會 – 公司官方網站

Environmental, Social and Governance Report

環境、社會及管治報告

Category of Stakeholders 持份者類別	Expectations and Care 期望和關切	Communication Channels 溝通管道
Employees	<ul style="list-style-type: none"> – Compensation and benefits for employees – Career development – Healthy and safe working environment 	<ul style="list-style-type: none"> – Assessment of employee performance – Meetings and trainings – Email, notice to the board, hotline, employee activities
僱員	<ul style="list-style-type: none"> – 僱員的補償和利益 – 職業發展 – 健康和安全的工作環境 	<ul style="list-style-type: none"> – 僱員表現評估 – 會議和培訓 – 電郵、通告板、熱線及僱員參與活動
Customers	<ul style="list-style-type: none"> – High quality products and services – Protection of customers' rights 	<ul style="list-style-type: none"> – Customer satisfaction survey – Face-to-face meetings and field interviews – Customer service hotline and email
顧客	<ul style="list-style-type: none"> – 高品質的產品和服務 – 保證客戶的權利 	<ul style="list-style-type: none"> – 顧客滿意度調查 – 面對面的會面和現場的訪問 – 客戶服務熱線和電子郵件
Suppliers	<ul style="list-style-type: none"> – Fair and public procurement – win-win cooperation 	<ul style="list-style-type: none"> – Open tender – Satisfaction evaluation of suppliers – Face-to-face meetings and field interviews – Industry seminars
供應商	<ul style="list-style-type: none"> – 公平公開的採購 – 雙贏合作 	<ul style="list-style-type: none"> – 公開招標 – 供應商的滿意度評估 – 面對面的會面和現場的訪問 – 工業研討會
Public	<ul style="list-style-type: none"> – Engagement in community – Business compliance – Awareness of environmental protection 	<ul style="list-style-type: none"> – Media conference and response to query – Public welfare campaigns – Face-to-face interviews
大眾	<ul style="list-style-type: none"> – 參與社區 – 業務合規 – 環境保護意識 	<ul style="list-style-type: none"> – 媒體會議和查詢 – 公共福利活動 – 面對面訪談

Environmental, Social and Governance Report

環境、社會及管治報告

Materiality Assessment

As the Group's ESG risks are industry-specific and are dependent upon the detailed business model of the company, the Group undertakes annual review in identifying and understanding its stakeholders' major concerns and material interests for the ESG Report. In the financial year 2018, the Group engaged an independent third party to conduct stakeholders engagement materiality assessment survey to ensure the accuracy and independence of the survey. Specifically, internal and external stakeholders were selected based on their influence and dependence on the Group. Stakeholders with a high level of influence and dependence on the Group were selected by the management of the Group and invited to express their views and concerns on a list of sustainability issues via an online survey. Through the survey, the Group identified sustainability issues which are of vital importance to stakeholders and the Group. The results of such materiality assessment are shown in the diagram below.

重要性評估

由於集團的ESG風險因行業而異，並取決於公司的具體業務模式，因此本集團每年都會進行持份者參與調查，用以識別及瞭解其持份者對本集團在環境、社會與管治報告上的主要關注事項及重大利益。本集團已於二零一八財年度委託獨立第三方進行持份者參與重要性評估調查以確保調查的準確性與獨立性。本集團以持份者對本集團的影響及依賴程度為基礎，挑選出內部及外部持份者進行重要性評估調查。獲選的持份者通過網上調查的方式，就可持續性發展的議題表達意見及提出關注。本集團通過該調查選定對持份者和集團至關重要的可持續性議題。重要性評估調查結果如下圖所示。

Stakeholder Engagement Materiality Matrix 重要性分析矩陣



Environmental, Social and Governance Report

環境、社會及管治報告

1	AIR POLLUTANTS AND GREENHOUSE GAS EMISSIONS	11	OCCUPATIONAL HEALTH AND SAFETY	21	MARKETING AND PROMOTION
1	大氣污染物和溫室氣體的排放	11	職業健康與安全	21	行銷和推廣
2	SEWAGE TREATMENT	12	DEVELOPMENT AND TRAINING OF EMPLOYEES	22	COMPLIANCE AND PROTECTION OF INTELLECTUAL PROPERTY RIGHTS
2	污水處理	12	僱員發展及培訓	22	遵守和保護知識產權
3	LAND USE, POLLUTION AND RESTORATION	12	PREVENTION OF CHILD LABOUR AND FORCED LABOUR	23	PRODUCT QUALITY ASSURANCE AND RECALL RATE
3	土壤的使用、污染和恢復	13	防止僱傭童工和強制勞工	23	產品品質保證和召回率
4	SOLID WASTE TREATMENT	13	SUPPLIERS BY REGION	24	CUSTOMERS' INFORMATION AND PRIVACY PROTECTION
4	固體廢物處理	14	供應商按地區分類情況	24	顧客資訊和隱私保護
5	USE OF ENERGY	14	SELECTION OF SUPPLIERS AND EVALUATION CRITERIA FOR ITS PRODUCTS/SERVICES	25	LABEL ISSUES RELATED TO PRODUCTS/SERVICES
5	能源使用	15	供應商選擇及其產品／服務的評估標準	25	與產品／服務相關的標籤問題
6	USE OF WATER RESOURCES	15	ENVIRONMENTAL ASSESSMENT OF SUPPLIERS	26	PREVENTION OF BRIBERY, EXTORTION, FRAUD AND MONEY LAUNDERING
6	水資源使用	16	供應商的環保評估	26	防止賄賂、勒索、欺詐和洗黑錢
7	USE OF RAW MATERIALS/ PACKAGING MATERIALS	16	SOCIETAL RISKS ASSESSMENT OF SUPPLIERS	27	ANTI-CORRUPTION POLICY AND REPORTING PROCESS
7	原材料／包裝材料的使用	17	供應商的社會風險評估	27	反貪污政策及舉報流程
8	ENVIRONMENTAL PROTECTION MEASURES	17	PROCUREMENT MEASURES	28	UNDERSTANDING LOCAL COMMUNITY NEEDS
8	環保措施	18	採購措施	28	瞭解當地社區需求
9	COMPOSITION OF EMPLOYEES	18	HEALTH AND SAFETY OF PRODUCTS/SERVICES	29	PUBLIC WELFARE AND CHARITY
9	僱員組成	19	產品／服務健康和 safety	29	公益和慈善
10	COMPENSATION TERMS AND WELFARE POLICY OF EMPLOYEES	20	CUSTOMERS SATISFACTION		
10	僱員薪酬條件和福利政策	20	顧客滿意度		

Environmental, Social and Governance Report

環境、社會及管治報告

A matrix for the materiality analysis was established and the 29 sustainability issues were ranked accordingly. For the purpose of this report, based on the results of the survey and the analysis, use of energy, air pollutants and greenhouse gas emissions and sewage treatment were classified as issues of vital importance to its stakeholders and the Group. The survey helped the Group in weighing and giving priority to sustainability issues of relevance and significance, which are addressed in this report to meet the expectations of stakeholders.

In the questionnaire, both internal and external stakeholders were highly concerned about the Group's green production and environmental protection measures. Stakeholders hope that the Group will step up its efforts in the governance and monitoring of environmental protection, strictly abide by the requirements of the competent local environmental protection authorities for clean production, beautify the environment of its plant area, and give priority to environmental protection while growing the enterprises, thus achieving sustainable development. In order to meet the aforesaid requirements, the Group is committed to minimizing the impact on the environment during the production process, and invited external organizations to conduct tests on the Group's production emissions, so as to ensure its compliance with the requirements of the local government. The Group plans to continue its pursuit of sustainable development in future operations and to preserve the environment while creating economic value.

In addition to the ESG issues above, the Group also identified SDGs which were concerned by stakeholders, including "Goal 3: Good Health and Well-Being" and "Goal 6: Clean Water and Sanitation". To address the stakeholders' concerns, better align its business growth with SDGs, and establish a good starting point to leverage and contribute to the globally significant sustainability issues, the Group meticulously evaluated its interconnections with these two objectives from within the company and commits to integrate them into its future strategic planning and business decision-making.

本集團建立了重要性分析矩陣，並相應地將29個可持續發展議題排序。就本報告而言，本集團根據調查和分析結果將大氣污染物和溫室氣體的排放和污水處理列為對其持份者和集團至關重要的議題。此項調查有助本集團衡量並優先考慮與其相關及有重要影響的可持續發展議題，並於本報告加以闡述，從而滿足持份者的期望。

在調查問卷中，內部和外部持份者都對集團的綠色生產以及環境保護措施極為關注。持份者希望集團能夠加大環境保護的治理與監控，嚴格遵守當地環境保護局的要求進行清潔生產，美化廠區環境，在發展企業的同時首先保護好環境，做到可持續發展。本集團為達到上述要求，在生產過程中盡量減少對環境的影響，並邀請外部組織對集團的生產排放進行檢測，以符合當地政府的要求。本集團計劃在接下來的運營當中繼續堅持可持續發展，在創造經濟價值的同時保護環境。

除了以上ESG議題，本集團還確定了持份者關心的SDG目標，包括目標三：良好健康與福祉和目標六：清潔飲水和衛生設施。為了解決持份者的關注事項，更好地使本集團業務增長與可持續發展目標保持一致，並建立一個良好的出發點，以利用和促進全球重大的可持續發展問題，本集團從公司內部精心評估其與這兩個目標的相互關係，並承諾將其融入未來的戰略規劃和業務決策中。

Environmental, Social and Governance Report

環境、社會及管治報告



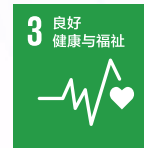
Ensuring a healthy lifestyle and promoting the well-being for people at all ages are critical to sustainable development. Through a series of policies designed to protect the physical and mental health of our employees, the Group provides employees with a healthy and safe working environment and excellent health protection, such as regular health check.



An integral part of the world we hope to live in is that everyone has access to clean water for drinking and use. Lack of water resources, poor water quality and inadequate sanitation also pose a negative impact on food security, livelihood options and educational opportunities for underprivileged families around the globe. As a steel manufacturer, water resources are critical to the operation of the Group. The Group recycles water during its production process and has adopted advanced processes to reduce water consumption.

Feedback of Stakeholders

The Group pursues excellence and actively welcomes feedback from stakeholders, especially feedback on issues classified as significant in the materiality assessment. Readers are also welcome to share their views with us by writing to our Hong Kong office address: Room 2003, Shun Tak Centre West Tower, 168-200 Connaught Road Central, Sheung Wan, Hong Kong.



確保健康的生活方式，促進各年齡段所有人的福祉對可持續發展至關重要。本集團通過一系列政策保障員工的身心健康，為員工提供健康安全的工作環境，並提供優質的健康保障，如定時體檢等。



人人享有清潔飲水及用水是我們所希望生活的世界的一個重要組成部分。水資源缺乏、水質差和衛生設施不足也對糧食安全、生計選擇和世界各地貧困家庭的教育機會造成負面影響。作為鋼鐵製造商，水資源對集團的運營至關重要。為減少用水，本集團在生產過程中循環用水並採取先進工藝減少用水量。

持份者的回饋

本集團追求卓越，積極歡迎利益相關者的反饋，尤其是有關在重要性評估中列為重要課題的反饋。亦歡迎讀者透過來函至本集團香港辦公室（地址：香港上環干諾道中168-200號信德中心西座2003室）與本集團分享其看法。

Environmental, Social and Governance Report

環境、社會及管治報告

V. ENVIRONMENTAL SUSTAINABILITY

The Group is committed to promoting the sustainability of the environment and community in which it operates. In the financial year 2018, the Group strictly abides by the laws and regulations of the PRC related to the environment, including but not limited to:

- Environmental Protection Law of the PRC;
- Law of the PRC on the Prevention and Control of Atmospheric Pollution;
- Water Pollution Prevention and Control Law of the PRC;
- Law of the PRC on the Prevention and Control of Environmental Pollution by Solid Waste;
- Law of the PRC on the Prevention and Control of Pollution from Environmental Noise; and
- Waste Disposal Ordinance (Cap. 354, Laws of Hong Kong).

This section mainly discloses policies, practices and quantitative data of the Group in relation to emissions, use of resources as well as environmental and natural resources in the financial year 2018.

A.1. Emissions

In the financial year 2018, no illegal activities which had significant impact on the Group were identified, including air and greenhouse gas emissions, discharges into water and land, hazardous and non-hazardous waste discharge. Our environmental policy includes controlling energy consumption of the Group and using more environmentally-friendly and energy-efficient equipment to reduce the environmental impact of our emissions.

V. 環境可持續發展

本集團致力帶動其經營所處之環境及社區的可持續發展。於二零一八財年，本集團嚴格遵守中華人民共和國環境相關的法律法規，包括但不限於：

- 《中華人民共和國環境保護法》；
- 《中華人民共和國大氣污染防治法》；
- 《中華人民共和國水污染防治法》；
- 《中華人民共和國固體廢物污染環境防治法》；
- 《中華人民共和國環境噪聲污染防治法》；及
- 《廢物處置條例》（香港法例第354章）。

本節主要披露本集團於二零一八財政年度有關排放物、資源使用、環境及天然資源的政策、常規及量化數據。

A.1. 排放物

在二零一八財年，本集團未發現任何對本集團有重大影響的違法行為，包括廢氣及溫室氣體排放、向水及土地排污、有害及無害廢棄物排放等。本集團的環境政策的內容包括控制集團的能源消耗、以及使用更環保有效的節能設備來減少集團排放對環境的影響。

Environmental, Social and Governance Report

環境、社會及管治報告

In the financial year 2018, our total emissions (including waste gas of factories and vehicles' exhaust) were 133,230 kg of sulphur oxides ("SO_x"), 108,913 kg of nitrogen oxides ("NO_x") and 66,601 kg of particulate matters ("PM"). Our total greenhouse gas emissions were 142,951.8 tCO₂e with the intensity of 359.1 tCO₂e per person. In the financial year 2018, the Group produced a total of 17,903 tons of domestic waste water and 294,724 kg of non-hazardous domestic solid waste. No hazardous waste was produced. The discharge intensity of waste was 19.0 tons of waste water per person and 313.5 kg of solid waste per person. Table 1 summarizes our total emissions in the financial year 2018.

在二零一八財年，本集團的廢氣總排放量（包含工廠廢氣和汽車尾氣）為133,230千克硫氧化物（「SO_x」）、108,913千克氮氧化物（「NO_x」）及66,601千克顆粒物（「PM」）。本集團溫室氣體排放總量為142,951.8噸二氧化碳當量，密度為359.1噸二氧化碳當量／人。本集團在二零一八財年共產生17,903噸生活廢水和294,724千克無害生活固體廢物，並沒有產生任何有害廢棄物。廢棄物的排放強度為19.0噸廢水／人和313.5千克固體廢物／人。表一匯總了本集團於二零一八財年的總排放量。

Table 1. Overview of emissions of the Group in the financial year 2018
表一. 本集團二零一八財年排放信息總覽

Category	Indicators	Unit	Emission	Intensity of emission (Unit/Person)* 排放強度 (單位／人)*
類別	指標	單位	排放量	
Exhaust gas 廢氣排放	Sulphur oxides (SO _x)	kg	133,230	141.7
	硫氧化物(SO _x)	千克		
	Nitrogen oxides (NO _x)	kg	108,913	115.9
	氮氧化物(NO _x)	千克		
Greenhouse gas 溫室氣體排放	Particulate matters (PM)	kg	66,601	70.9
	顆粒物(PM)	千克		
	Direct emissions (scope 1)	tCO ₂ e	191,567	203.8
	直接排放 (範圍1)	噸二氧化碳當量		
	Energy indirect emissions (scope 2)	tCO ₂ e	146,307	155.7
	能源間接排放 (範圍2)	噸二氧化碳當量		
	Other indirect emissions (scope 3)**	tCO ₂ e	93	0.2
	其他間接排放 (範圍3) **	噸二氧化碳當量		
Non-hazardous waste 無害廢棄物	Total greenhouse gas emissions (scope 1,2 & 3)	tCO ₂ e	337,968	359.5
	總溫室氣體排放量 (範圍1,2和3)	噸二氧化碳當量		
	Domestic waste water	ton	17,903	19.0
	生活廢水	噸		
	Solid waste	kg	294,724	313.5
	固體廢物	千克		
*	Intensity of emission is calculated by dividing the amount of greenhouse gas emissions or non-hazardous waste generated by the Group by the number of its employees in the financial year 2018;		* 排放強度乃按本集團所產生溫室氣體排放或無害廢棄物數量除以本集團二零一八財政年度員工人數計算；	
**	Greenhouse gas emission (scope 3) of the Group (other indirect emissions) includes only greenhouse gas emissions from waste paper disposed of at landfills.		** 本集團溫室氣體排放範圍三 (其他間接排放) 僅包括於堆填區處置之廢紙所引致的溫室氣體排放。	

Environmental, Social and Governance Report

環境、社會及管治報告

Due to the nature of the industry, the Group attaches great importance to issues of environmental protection, energy conservation and emission reduction. Employees are encouraged to reduce water and power consumption in their daily operations, take measures to fully recycle waste to reduce unnecessary generation of waste, thereby minimizing the environmental impact of the Group. Specific emissions in this financial year are as follows:

Air Pollutants and Greenhouse Gas Emissions

The special steel manufacturing business of the Group inevitably has certain impact in terms of air pollutants, which mainly include sulphur oxides, nitrogen oxides, greenhouse gases and dust. In order to monitor the atmospheric emission from the factory around the clock, online monitoring equipment was installed in the factory chimneys, and dust collectors were continuously upgraded. The factory has installed two sets of desulfurization device for effective desulfurization treatment of exhaust gas to ensure its sulphur content meeting the industry standards. At the same time, the Group has also installed a pickling line in the exhaust pipe of the production equipment to reduce the content of nitric acid and sulfuric acid in the gas emissions. To reduce fugitive dust, the raw material storage area and the floor of the workshop with fugitive dust problem in the factory were fully covered with dust-proof net and sprayed with water to prevent air pollution due to dust generated from transportation of raw materials and waste, which would jeopardize the health of employees. In order to closely monitor the emission level from the factory area, professional inspection technology companies are employed from time to time to conduct testing on the components of environment, including air, surface water, ground water, wastewater, noise, soil etc. within the factory area and its surroundings. A comprehensive test has been conducted in this financial year, and all indicators met the standards.

由於行業性質，本集團高度重視環保及節能減排問題，並鼓勵員工在日常營運中節約用水及用電，採取措施全面回收廢料以減少不必要廢棄物的產生，從而盡可能減低集團對環境之影響。本財年具體排放情況分別呈報如下：

大氣污染物及溫室氣體排放

本集團特鋼製造業務在大氣污染方面不可避免地產生一定影響。本集團產生的主要大氣污染物包括硫氧化物、氮氧化物、溫室氣體及煙塵。為時刻監控工廠外排之大氣污染物，本集團在工廠煙囪內加裝了在線監控設備，並不斷對除塵器進行性能改造升級。工廠安裝有脫硫裝置，對外排廢氣進行有效的脫硫處理，保證其含硫量達到行業標準。同時，本集團還在生產設備的排氣筒安裝酸洗機組以減少氣體排放物中的硝酸及硫酸含量。為減少揚塵，本集團在工廠內原料儲存區及涉及揚塵問題的車間周圍全面覆蓋防塵網，並定期灑水，防止原料和廢料在運輸過程中產生灰塵，從而加重大氣污染，危害員工身體健康。為深入了解廠區對環境的排放程度，本集團不定期聘請專業檢驗技術公司對廠區內及附近的環境，包括空氣、地表水、地下水、廢水、噪聲、土壤等項目進行檢測。本財年已進行一次全面檢測，各項指標均基本達標。

Environmental, Social and Governance Report

環境、社會及管治報告

Direct and indirect measures have been adopted to reduce emissions of greenhouse gases. For direct measures, fuel consuming facilities such as boilers are constantly upgraded, with electricity and other energy sources gradually replacing traditional energy of coal to reduce air pollution. For indirect measures, as the Group is well aware that emissions of greenhouse gases are inextricably linked to use of electricity. Therefore, a power plant of exhaust gas was built in collaboration with other companies, which could generate electricity with high temperature and high pressure exhaust gas. The measure has not only largely controlled and reduced emissions of exhaust gas, but also saved a lot of electricity, further improving utilization efficiency of energy and reducing emissions of greenhouse gases. Office operation of the Group also necessitates the use of electricity. To control power consumption, a number of energy-saving and emission-reduction measures were adopted. Specific energy-saving measures are further disclosed in A2 Use of Resources.

Wastewater

Wastewater generated by the Group mainly came from daily water consumption by office staff within office areas, which comprised washing and flushing wastewater. Domestic sewage is treated by the domestic sewage treatment device and reused in production. No production or domestic wastewater is discharged into the water environment. All wastewater generated from engineering production, which is used on cascade basis, is reused in the production process. Wastewater generated during the steel manufacturing operation was treated and recycled through sewage treatment stations in the factory, so there was almost no effluent of wastewater from the operation. The sewage treatment station effectively processed the domestic sewage generated in the factory administrative area and wastewater generated in the production process. The purified circulating water was recycled for secondary consumption to replenish turbid circulating water and the consumption of water for the processes of mixing and dehumidifying ash silo, hence we have basically achieved zero emission of wastewater from production, thereby reducing the consumption of fresh water. Quality of treated domestic sewage meets the A-level standard requirements under the first grade standards of GB18918-2002 and all treated domestic sewage is recycled for production and processing purpose.

為減少溫室氣體排放，本集團已採取直接及間接措施。直接措施方面，本集團正在不斷改造升級鍋爐等燃料設備，逐步使用電力等代替傳統能源煤，從而減少大氣污染。間接而言，本集團深知溫室氣體排放量與電力使用密不可分。因此，本集團與其他公司合建了廢氣發電廠，利用高溫高壓廢氣進行發電。該舉措不僅很大程度上控制並減少廢氣排放，同時節約了大量電能，進一步提高了本集團能源的利用率，降低了集團溫室氣體排放量。本集團辦公室的運營也離不開電力的使用。為了控制電力消耗，本集團採用了諸多節能減排措施，具體節電措施將在A2資源利用裏進一步披露。

廢水

本集團所產生之廢水主要源於本集團辦公室員工於辦公範圍內產生的日常用水，包括洗滌及沖廁廢水。生活污水經生活污水處理裝置處理後回用生產，無生產生活廢水排到水環境中。工程生產廢水經串級使用，全部回用於生產過程。而本集團鋼材製造業務運營過程中產生的廢水均經過工廠內的污水處理站進行處理並循環使用，因此該業務幾乎未產生外排廢水。該污水處理站將廠區行政區域產生的生活污水和生產產生的廢水進行有效的處理。其中淨循環水排污作為二次用水，補充濁循環水消耗及混料、灰倉加濕等工藝用水消耗，生產廢水基本實現零排放，並以此減少新水用量。生活污水經處理後水質可達到GB18918-2002一級標準中A標準要求。處理後的生活用水全部循環利用於生產加工。

Environmental, Social and Governance Report

環境、社會及管治報告

Solid Waste

Solid waste generated by us included domestic waste generated in offices and waste generated from the production process in the factory area of the steel manufacturing operation, which covered dust collected by dust collectors, gas ash, oxidized iron sheets, steel slag and water slag. The domestic waste generated in the Hong Kong office was collected and disposed by the property management company of the office building. Industrial waste such as steel slag and water slag will be separately recycled and sold to cement plants, brick factories, etc. for production purpose, and other industrial solid wastes are recycled by being sold to other producers for reproduction or passed to professional processing plants for recycling. While the domestic waste generated in administrative areas was also collected and disposed by local professional waste processing companies. To reduce solid waste, we have adopted corresponding measures, which are elaborated in A2 Use of Resources.

Noise and Dust Control

The Group has strictly complied with the “Construction Plan for Prevention of Dust and Reduction of Noise at Work Site” and used various methods to mitigate the negative impact of noise on the surrounding areas. Low-noise mechanical equipment or sound-insulating equipment has also been used to replace traditional equipment, and operation of high-noise equipment was prohibited at noon and from evenings. To further reduce noise generated at operation sites, low noise equipment was used while vibration dampers and mufflers were also installed at sources of noise such as air compressors, oxygen compressors and blowers. After taking noise insulation and noise reduction and other measures for its plants, the Group’s high-noise equipment will not seriously affect the offices and the surrounding environment, which meets local environmental protection requirements. To reduce the damage of dust to the surroundings and human health during industrial production, a series of daily simple measures were adopted, such as flushing or sprinkling the floor with water daily to clean dust and avoid accumulation of mud.

固體廢料

本集團產生的固體廢料包括辦公室產生的生活垃圾和鋼材製造業務工廠範圍內的生產垃圾，包括各除塵器收集的灰塵、瓦斯灰、氧化鐵皮、鋼渣和水渣。其中香港辦公室產生的生活垃圾由辦公樓所屬物業公司負責統一收集清理。鋼渣和水渣等工業垃圾會被單獨回收並賣給水泥廠、磚廠等用於生產利用。其他工業固廢則會通過賣給其他生產商再生產或交由專業處理廠進行回收利用。而工廠行政生活區域產生的生活垃圾也由當地專業的垃圾處理公司負責收集清理。為減少所產生之固體廢料數量，本集團已採取相應措施，將在A2資源利用中詳細說明。

噪聲和粉塵控制

本集團已嚴格遵守《工地防塵降噪施工方案》，透過多種方法來減輕噪音對周邊各區域的負面影響。本集團亦已用低噪音機械設備或隔音設備代替傳統設備，禁止高噪音設備中午及晚上運作。為進一步減少營運地點所產生的噪聲，本集團不僅選用低噪聲設備，同時於空壓機、氧壓機、鼓風機等噪聲源加裝減振設備和消聲器。本集團的高噪聲設備經採取廠房隔音、消聲等措施後，對辦公室和周圍環境均不會造成嚴重影響，符合當地環保要求。為了減少工業生產過程中粉塵對周圍環境和人體健康的危害，本集團另採取了一系列日常簡單措施，如每天沖洗地面或灑水等，以清潔灰塵及避免泥污堆積等。

Environmental, Social and Governance Report

環境、社會及管治報告

A.2. Use of Resources

Main resources used in the financial year 2018 were diesel, town gas, anthracite, coke, petrol, electricity and water resources (as summarized in Table 2 below). To realize our medium and long-term control plan of energy and environmental protection targets, the Group constantly strengthened the review of the implementation of measures, implemented strict quota and indicators management, and continuously accelerated production restructuring. The Group's specific performance in resource management is as follows.

Table 2. Total resources utilization of the Group for the financial year 2018

表二. 本集團二零一八財年總資源使用量

Category	Resources	Unit	Utilization	Intensity of resources utilization (Unit/Person) 資源使用強度 (單位/人)
類別	資源	單位	用量	
Natural resources 天然資源	Diesel 柴油	litre 公升	149,898	159.5
	Town gas 煤氣	m ³ 立方米	128,160,000	136,340.4
	Anthracite 無煙煤	ton 噸	5,949	6.3
	Coke 焦炭	ton 噸	20,691	22.0
	Petrol 汽油	litre 公升	14,235	15.1
	Electricity 電力	kWh'000 千瓦時'000	132,031	140.5
Water 水		ton 噸	77,551	82.5
Papers 紙張		kg 千克	19,329	20.6

A.2. 資源使用

本集團於二零一八年財年所使用的主要資源為柴油、煤氣、無煙煤、焦炭、汽油、電和水資源，概述於下表二。為了實現集團的中長期能源環保目標控制計劃，不斷強化對環保措施執行情況的評審，實行嚴格的定額和指標管理，和不斷加快生產結構化調整的步伐。本集團在資源管理上的具體表現如下。

Environmental, Social and Governance Report

環境、社會及管治報告

Power Consumption

Power consumption of the Group is mainly attributed to the power requirements of refitted furnace in the factory, as well as the daily power needs of administrative areas and the Hong Kong office. To ensure effective power consumption, the Group has adopted a number of power saving measures in 2018, including but not limited to:

- Enhance education to raise awareness of staff in environmental protection, energy conservation and emission reduction;
- Posters reading "Save power consumption, switch off lights when leaving" are posted in prominent position to encourage employees to save power consumption;
- Switch off electrical appliance in office whenever and wherever not necessary;
- Adjust air-conditioners based on needs and turn them off when not in use;
- Implement cleaning and maintenance programs to ensure efficient operation of office equipment (e.g. refrigerators, air conditioners, shredders etc.); and
- Install power-saving fixtures for office lighting in replacement of lights with high power consumption.

用電

本集團電力消耗主要來自工廠內改裝的加熱爐等設備的動力需要以及行政生活範圍和香港辦公室的日常用電需要。為確保有效用電，本集團已於二零一八年財政年度採用若干節電方式，包括但不限於：

- 加強職工的教育工作，增強其環保和節能減排的意識；
- 在當眼位置張貼「節省用電，離開時請關燈」的海報鼓勵僱員省電；
- 無論在何時或何地，要求員工在不必要時關閉辦公室用電設備；
- 根據需求調節空調溫度，並在不必要時關閉；
- 實行清潔及維護計劃，令辦公設備（如冰箱、空調、碎紙機等）有效運作；及
- 在辦公室照明安裝節電電燈以取代耗電量高的電燈。

Environmental, Social and Governance Report

環境、社會及管治報告

Water Consumption

Clean water consumption of the Group is mainly attributed to daily water consumption of its employees in the office and administrative areas during working hours. Water consumption in factory areas mostly comprises recycled and reclaimed water. The Group's water is mainly sourced from the Tianpo Reservoir near the Company, the well in its plant area, the pond in the Titdong Village, etc. The Group also recycles water to reduce water consumption. In the financial year 2018, none of the Group's water sources were in the local water source protection zone, therefore, no problems were identified in seeking suitable water sources. For the purpose of water conservation, the Group encourages every employee to play a key role in reducing water consumption and contribute to environmental protection in the course of business. In addition, to improve utilization efficiency of water resources, the Group also incorporates the following measures in its internal regulatory policy:

- Organize relevant departments to monitor and assess the water use on a regular basis;
- Posters reading "Cherish water" are posted in prominent position to encourage employees to reduce water consumption;
- Employees education programmes on conservation of water are launched from time to time;
- Timely repair and maintenance of water supply system to prevent water leakage;
- Leak proof tests on faucets and gaskets, as well as water supply system testing are regularly conducted to avoid other failures; and
- Employees are required to strictly abide by the principle of water conservation in their daily work.

用水

本集團水消耗主要來自其員工在工作時間於辦公樓和行政生活區的日常用水，而工廠範圍所用水大部分為循環水和再生水。本集團的用水主要來自於公司附近的天坡水庫、廠區機井水、堤東村池塘水等，並循環用水以減少用水量。於二零一八年財年，本集團的水源並未在當地水源保護區內，因此在求取適用水源上未發現任何問題。為減少用水量，本集團已致力呼籲每名僱員為環保出一份力。除此之外，為提高水資源的利用效率，本集團還在其內部監管政策中納入以下措施：

- 定期組織相關部門監察，並對用水情況進行考核；
- 在當眼位置地方張貼「節約水資源」標識以鼓勵節約用水；
- 不定期向僱員開展節水教育工作；
- 對供水系統進行及時維修和保養，以防漏水；
- 定期對水龍頭、墊圈進行防漏測試，並測試供水系統，避免其他故障；及
- 要求僱員在日常工作中嚴格遵守節約用水的原則。

Environmental, Social and Governance Report

環境、社會及管治報告

Paper Consumption

To ensure the Group meets the requirements of more environmentally-friendly and effective consumption of paper, new methods of paperless office are constantly explored and actively promoted. Every effort from “source” to “end” has been made. “Source” initiatives involve choosing more eco-friendly sources as paper suppliers, thereby indirectly reducing tree loss for producing the same amount of paper. In addition, recycled paper was used instead of ordinary paper to reduce the consumption of natural resources. On the other hand, “end” initiatives involve adopting various measures to directly cut paper consumption. Some methods for managing the use of paper have been adopted, details of which are as follows:

- Double-sided printing is encouraged;
- Paperless office is practised in office areas, for instance, video conferencing and email etc. are encouraged instead of traditional methods of information delivery;
- The other side of paper which has been printed on one side is used for drafting; and
- Targets are set for reducing office paper consumption with an aim to reduce paper consumption as planned.

用紙

為確保在使用紙張方面能達到更環保及有效的要求，本集團不斷探索新方法並積極推進無紙化辦公的理念，自「始」至「終」均竭盡全力。「始」即選擇更加環保的紙張來源作為供應商，藉此在生產同等數目紙張的同時，間接減少樹木損失，以及選擇採用回收用紙取代一般用紙，以減少自然資源流失。「終」即透過各種措施直接減少用紙量。本集團亦已採取若干方式管理紙張的使用，具體如下：

- 呼籲員工進行雙面打印；
- 在辦公室範圍推行無紙化辦公，鼓勵員工利用視頻會議、電子郵件等方式代替傳統信息傳遞模式；
- 使用僅打印了一面的紙張以草擬文件或用作草稿紙；及
- 對辦公室用紙設立用額目標，有計劃地減少集團紙張使用量等。

Environmental, Social and Governance Report

環境、社會及管治報告

Raw Materials and Packaging Materials

Packaging materials of the Group come from factories and mainly include steel bars and steel strips. Both are 100% recycled and re-used to significantly reduce the environmental impact of waste materials, so there was no statistics on total amount of packaging materials. Raw materials used by the Group primarily include raw ore, lime, coal and coke, the consumption of which mainly depends on the requirements of orders and production. To reduce the consumption of raw materials and improve their utilization efficiency, the Group actively promotes the practice of environmental protection services and measures and the concept of "sustainability" to customers, and environmentally friendly products are purchased and recycled as much as possible. In the financial year 2018, the following measures were adopted:

- Awareness of environmental protection of on-duty staff is raised by education before/after duty;
- Control air-fuel ratio and improve fuel combustion efficiency;
- Promote the use of raw coal with high calorific value, low ash content and low moisture, thereby boosting utilization efficiency of fuels;
- Optimize ventilation to ensure full combustion of pulverized coal;
- Learn from the experience of other companies for constant technological transformation;
- Improve the variables of operating process to improve utilization efficiency of equipment;
- Perform regular maintenance of motors of vehicles; and
- Use automatic equipment and reduce the use of vehicles.

原材料和包裝材料

本集團包裝材料來自工廠，主要包括鋼筋和鋼帶。為了極大地減少廢棄材料對環境的影響，本集團對於用於包裝的鋼筋和鋼帶均採用100%回收和再利用，因此並無統計包裝材料的總量。本集團使用的原材料主要包括原礦、石灰、煤和焦炭。其使用量主要根據訂單和生產需求。為減少原材料的使用消耗，提高其利用效率，本集團積極推進環保服務的實踐，向客人推廣「可持續發展」的措施和理念，並盡可能地購買和回收環保產品。於2018財年，本集團還採取了以下措施：

- 對當值員工進行當班前／後教育，提高其節能環保的意識；
- 控制風燃比，提高燃料燃燒效率；
- 提倡使用高熱值、低灰分、低水分的原煤，提高燃料利用率；
- 優化系統用風，保證煤粉充分燃燒；
- 學習其他公司先進經驗，並不斷進行技術改造；
- 優化工藝指令引數，提高設備運轉率；
- 對運輸車輛的發動機進行定期保養；及
- 使用自動化設備，減少移動車輛使用等。

Environmental, Social and Governance Report

環境、社會及管治報告

A.3. The Environment and Natural Resources

The Group strictly abides by laws and regulations relevant to the environment, such as “Environmental Protection Regulations of Construction Projects” and regularly inspects and monitors its daily operations. The Group has practised recycling of resources in the daily operation as much as possible to reduce its consumption of natural resources and enhance effective use of resources. In addition to the self-built sewage treatment stations in the factory, the Group also clarified its energy management policy to further improve its water resources management and wastewater treatment systems. At the same time, large number of trees were planted on the hills near its area of operation to offset some of the greenhouse gases generated. The measure not only beautifies the environment, but also improves air quality and is very important to protect, restore, and even improve the landscape and surrounding ecological environment.

Sustainable Development Goals (SDGs) of United Nations define the vision and priorities of global sustainability in 2030 and call on all enterprises to maximize their innovation capabilities for addressing the challenges of sustainability and achieve the 17 sustainability goals together. We incorporated the SDG Compass and achieved the understanding of sustainability goals, setting of priorities and long-term goals, integration and implementation of corporate sustainability efforts, and effective reporting and communication.

Anticipating that global warming will lead to stakeholders’ and the government’s higher requirements for the Group’s environmental protection efforts, the Group has taken the initiative to formulate environmental protection regulations and strengthen the daily maintenance of environmental protection facilities in order to minimize the environmental impact of our daily operations.

A.3. 環境及天然資源

本集團嚴格遵守環境相關的法律及規例，如《建設項目環境保護條例》等，並定期視察及監控本集團的日常營運。本集團在日常營運中已盡可能進行資源的回收利用，以降低其天然資源的使用量並提升資源使用效率。除了工廠內自建的污水處理站外，本集團亦明確能源管理方針，進一步完善其水資源管理和廢水處理制度。同時，為了抵消本集團產生的部分溫室氣體，集團在其運營範圍附近的山上種植了大量的樹木。該舉措不但可以美化環境，亦能改善空氣質量，對保護、修復、以至改善景觀和周邊生態環境非常重要。

聯合國可持續發展目標(SDGs)明確了2030年全球對可持續發展的願景和優先事項，並呼籲所有企業最大限度地利用其創新能力來應對可持續發展的挑戰，共同實現17個可持續發展目標。本集團結合聯合國可持續發展企業行動指南，做到了解可持續發展目標，確定優先事項，設定長期目標，整合落實企業可持續發展工作，以及有效地進行報告和溝通。

本集團意識到全球氣候變暖會讓持份者及政府對集團的環保工作有更高的要求，因此本集團主動制定環保相關規定、加強環保設施的日常維護，以期降低日常營運對環境的影響。

Environmental, Social and Governance Report

環境、社會及管治報告

VI. SOCIAL SUSTAINABILITY

Employment and Labour Standards

B.1. Employment

The Group cherishes its talents, and regards them as the most valuable asset of the Group and the key to the Group's success and sustainable development. The Group has persisted in the combination of a people-oriented management philosophy and an innovation mechanism. Through diversity and humanistic management, the Group has established a close relationship of mutual trust and support between the Group and its staff, and created a positive, healthy and motivated corporate culture and safe working environment for its employees.

The Group always strives to provide its employees with a safe and suitable platform for developing their career, enhancing their professional skills and improving their personal quality. The Group attaches great attention to employee training and cultivates employees to provide high-quality service to all customers.

Our human resources policy complies strictly with the employment laws and regulations of the Mainland China and Hong Kong, including but not limited to:

Mandatory Provident Fund Schemes Ordinance (Cap. 485, Laws of Hong Kong);

Minimum Wage Ordinance (Cap. 608, Laws of Hong Kong);

Labour Law of the PRC;

Labour Contract Law of the PRC; and

Social Insurance Law of the PRC etc.

The Group has also complied with the laws and regulations with respect to the employees' social security schemes that are enforced by the local governments in the PRC in relation to employee benefits. The human resources department of the Group is responsible for reviewing and updating the relevant policies on a regular basis in accordance with the latest laws and regulations.

VI. 社會可持續發展

僱傭及勞工常規

B.1. 僱傭

本集團珍惜人才，視其為本集團最寶貴的資產和推動本集團成功及維持可持續發展的關鍵。本集團堅持將以人為本的管理理念與創新機制相結合。通過多元化和人性化管理，本集團與員工建立了密切的互信與互相支持的關係，為員工創造了積極、健康、主動的企業文化和安全的工作環境。

本集團一直致力為員工提供安全及合適的平臺，以發展他們的職業道路、提升專業能力和自身素質的提高。本集團十分注重員工培訓，培養員工，為所有客戶提供優質服務。

本集團的人力資源政策嚴格遵守中國大陸和中國香港的僱傭法律法規，包括但不限於：

《強制性公積金計劃條例》（香港法例第485章）；

《最低工資條例》（香港法例第608章）；

《中華人民共和國勞動法》；

《中華人民共和國勞動合同法》；及

《中華人民共和國社會保險法》等。

本集團亦已遵守有關僱員社會保障計劃的法律及法規，該等計劃由中國內地地方政府就僱員福利執行。本集團的人力資源部門根據最新法律及規例定期審閱及更新有關集團政策。

Environmental, Social and Governance Report

環境、社會及管治報告

Recruitment is the key to the Group's long-term sustainable development. The Group prudently selects employees through recruitment events and has established annual recruitment plan, which clarifies the number of employees to be employed, title of the vacant jobs and the requirements on candidates. The Group attracts talented employees through various channels including the internet, recruitment seminars and head-hunting companies. Meanwhile, proven and sound human resources management procedures are established to regulate and define the human resources planning and classification, clear requirements for the education, training, skills and experience of certain staffs, capability assessment, qualification examination, and final job allocation.

Employees' emoluments and welfare are determined based on the applicants' past performance, personal attributes, work experience and career expectation. Retaining talents is also a pivotal part of our human resources management. To motivate and reward existing management and staff, emolument review based on our profitability, staff performance and market trend is regularly conducted. Meanwhile, internal performance assessment system is formulated to ensure efforts of our staff are recognized and the assessment results form the basis for salary adjustment and rewards. Our promotion system adheres to the principles of fairness and transparency, and talents are selected in accordance to job requirements.

Any appointment, promotion or termination of the employment contract would be made based on reasonable, lawful ground and internal policies, such as staff handbooks. The Group strictly prohibits any kind of unfair or unreasonable dismissals.

The Group has already formulated internal policies on its employees' working hours and rest periods in accordance to the Labour Law of the PRC and local employment laws. Other than the basic annual paid leave as required in the local government's employment laws and statutory holidays, employees are also entitled to additional leave including marriage leave, maternity leave and compassionate leave etc. Staffs are entitled to receive proper overtime payment or compensation leave for working overtime out of office hours.

招聘員工是本集團長期可持續發展的關鍵。本集團通過招聘活動審慎選擇員工，並製定年度招聘計劃，明確員工人數，空缺職位名稱和候選人要求。本集團通過互聯網，招聘研討會及獵頭公司等多種渠道吸引優秀員工。與此同時，本集團建立了成熟完善的人力資源管理程序，對人力資源策劃及分類，規定人員的教育、培訓、技能和經驗要求，在崗人員能力評價、資格鑑定，以及最終配置上崗都有著明確的規定和工作程序。

本集團根據應徵者個人過往表現、個人素質、工作經驗及職業期望等，商定僱員薪酬福利。挽留人才也是本集團人才管理的一個重要部分。為激勵和獎勵現有管理層和員工，本集團按照集團的盈利能力、員工績效和市場趨勢定期進行薪酬檢討。同時本集團制訂內部績效評估制度，確保員工在工作上的努力得到認可，並根據評估結果對其給予調薪機會和相應的回報。本集團的晉升政策堅持公平透明的原則，按照職位要求提拔人才。

任何僱傭合同的任命、晉升或終止都將基於合理、合法的基礎和內部政策，如員工手冊。本集團嚴格禁止任何形式的不公平或不合理解僱。

本集團已根據《中華人民共和國勞動法》和地方就業法等法律制定內部關於僱員工作時數及假期的政策。除地方政府就業法規定的基本帶薪年假和法定假期外，僱員還可以享有婚假、產假和喪假等額外假期待遇。員工在非辦公時間加班後，可以根據勞動法規定收到適當的加班費或補償假。

Environmental, Social and Governance Report

環境、社會及管治報告

As an employer in pursuit of equal opportunity, the Group is committed to creating a fair, respectful and diverse working environment by promoting anti-discrimination and equal opportunity in all of its human resources and employment decisions. In other words, training and promotion opportunities, dismissals and retirement policies are based on factors irrespective of the employees' age, gender, race, colour, disability, nationality, religion or any other non-job-related elements. Meanwhile, the equal opportunity policy allows zero tolerance in relation to any workplace discrimination, harassment or vilification in accordance with local ordinances and regulations, such as Disability Discrimination Ordinance (Cap. 487, Laws of Hong Kong) and Sex Discrimination Ordinance (Cap. 480, Laws of Hong Kong). Employees are highly encouraged to report any discrimination to the human resources department of the Group. The Group will then take the responsibility of assessing, dealing with, recording and taking any necessary disciplinary actions on such incidents.

The Group provides working clothes, meals and staff dormitories to its factory workers for their daily needs. In order to promote the employee's sense of belonging, the Group provides various welfare to its employees including annual physical examination and plentiful festive gifts, etc. Meanwhile, employees' opinion and complaints are collected. A timely and smooth communication with the management is maintained through boards' announcements, training, staff manuals, emails and meetings. Through the establishment of a timely and effective communication system, the Group ensures each staff is duly respected and cared for, and encourages the management to listen to staffs at the grassroots level, which in turn could strengthen all staffs' cohesiveness as a whole.

In the financial year 2018, the Group strictly complied with the relevant laws and regulations that are material to the Group in the aspects of emolument and dismissal, recruitment and promotion, working hours, holidays, equal opportunities, diversity, anti-discrimination and other package and welfare.

作為一個機會均等的雇主，本集團致力於通過在其所有人力資源和就業決策中促進反歧視和平等機會，創造一個公平、尊重和多元化的工作環境。換句話說，培訓和晉升機會，解僱和退休政策不是基於以下僱員的年齡、性別、種族、膚色、殘疾、國籍、宗教或任何其他非工作相關因素。同時，平等機會政策允許根據當地條例和規定，例如《殘疾歧視條例》（香港法例第487章）及《性別歧視條例》（香港法例480章）等，對任何工作場所的歧視、騷擾或中傷零容忍。我們強烈鼓勵員工向集團人力資源部門報告任何涉及歧視的事件。本集團將評估、處理、記錄和對此類事件採取任何必要的紀律處分。

本集團為工廠工作人員提供工作服、飯食和員工宿舍等以滿足員工的日常需求。為了提高僱員的歸屬感，本集團為僱員提供包括年度身體檢查、豐富的節假日禮品等多種福利。與此同時，員工與管理層通過公告欄發佈，培訓，員工手冊，電子郵件和會議，收集員工的意見和投訴，維持及時流暢的交流。通過建立及時有效的溝通系統，本集團保證每一位員工都得到尊重和關懷，鼓勵管理層聽取基層聲音，以此增強本集團全體員工的凝聚力。

於二零一八財年內，本集團在薪酬及解僱、招聘及晉升、工作時數、假期、平等機會、多元化、反歧視以及其他待遇及福利方面，嚴格遵守對本集團有重大影響的相關法律及規例。

Environmental, Social and Governance Report

環境、社會及管治報告

B.2. Health and Safety

To provide and maintain favourable working conditions and a safe and healthy workplace, the Group strictly adheres to the Occupational Safety and Health Ordinance (Cap. 509, Laws of Hong Kong), Production Safety Law of the PRC, Law of the PRC on the Prevention and Control of Occupational Diseases, Regulation on Work-related Injury Insurance and Notice of Regarding the Issuance of the 5 Implementation and 5-Requirement-in-force of Corporate Production Responsibility System. Responsible employees at all levels are reminded to perform their duties diligently which include exercising good safety management of production line and various segments of the process as well as timely elimination of potential dangers. As the Group continues to enhance management and control of safety and health risks, it has formulated the Articles of Assessment of Safety and Environmental Management, Preparation and Response Control Procedures for Environmental and Occupational Health and Safety Emergencies to maintain a safe working environment and prevent emergencies.

In order to implement relevant laws, regulations, policies and standards regarding the prevention of occupational illness in the PRC as well as strengthen its prevention and control of occupational illness, the Group formulated the Occupational Health Management System and required the management and staff to comply strictly with the internal guidance in carrying out their daily work. Meanwhile, the Group organized them to participate in regular occupational hygiene training, supervised and monitored the formulation and implementation of hygiene management system and handling procedures in their daily work. In the event of an occupational disease accident, the Group should report timely to the local safety production supervisory and management department, coordinate its departments to adopt effective measures with speed, focus on the reduction and elimination of hazardous factors of the occupational disease accident and prevent the accident from expanding. Delayed report, omitted report, false report or non-report of the occupational disease accidents are strictly prohibited by the Group.

B.2. 健康與安全

為了提供並維持良好的工作條件及安全健康的工作環境，本集團嚴格遵守《職業安全及健康條例》（香港法例第509章）、《中華人民共和國安全生產法》、《中華人民共和國職業病防治法》、《工傷保險條例》及《關於印發企業安全生產責任體系五落實五到位規定的通知》，並督促各級責任人員盡職盡責，做好生產線及工作各環節的安全管理工作，及時消除事故隱患。本集團繼續加強對安全健康風險的管理及控制，制定《安全環管理考核細則》、《環境職業健康安全應急準備與響應控制程序》等守則，保持安全的工作環境及防範緊急情況。

為貫徹執行中華人民共和國有關職業病防治的法律、法規、政策和標準，加強對職業病防治工作的管理，本集團制定了《職業健康管理制》，並規定管理層和僱員的日常工作必須嚴格遵照內部指引。同時，本集團組織員工參加定期的職業衛生培訓，在日常工作中督促監督衛生管理制度和操作規程的制定和落實。如遇職業病危害事故，本集團應及時向所在地安全生產監督管理部門報告，並組織各部門迅速採取有效措施，著力減少並消除職業病的危害因素，防止事故擴大。本集團嚴厲禁止遲報、漏報、謊報或者瞞報職業病危害事故的行為。

Environmental, Social and Governance Report

環境、社會及管治報告

The Group strives to heighten employees' safety awareness and maintain a clean, smokeless, non-toxic, hazard-free, healthy and safe working environment. Safety labels are posted in appropriate places to remind staff of safety, dress code and conduct in a factory. We participate in emergency drills organized by the management department of the office building from time to time. Cleaning companies are hired to disinfect the carpet on a regular basis and clean the air conditioning system. In addition, health and safety measures are implemented and supervised by the deputy general manager of its production base for constant improvement of occupational safety and health risk management, ensuring the proper implementation of the following safety measures:

- Safety passageway within our workshops are required to be unblocked, with safety lines marked clearly and each item placed orderly and tidily ;
- Appropriate work uniform and personal protective equipment, such as safety helmets, safety belts, masks and goggles, are provided to employees based on their job nature and actual operations;
- Safety training is provided to employees engaging in special steel manufacturing, including emergency management, materials handling, machinery protection and occupational health and safety;
- Employees are required to displace the air of tank bodies, limited space or pipelines according to the gas used at the site (nitrogen, compressed air, steam) with safety test passed before entering such areas;
- Smoking and drinking at workplace is strictly forbidden;
- 本集團旨在提醒雇員提高安全意識及維持一個清潔、無煙、無毒、無害、健康安全的工作環境。本集團在適當的地方張貼安全標識，時刻提醒雇員注意安全以及規範工廠著裝和行為措施。本集團不時參與辦公樓管理部門舉辦的應急演習。本集團另聘請清潔公司定期對地毯進行消毒，並清潔空調系統。此外，由生產基地的副總經理負責執行及監督健康安全措施，不斷提升職業安全健康風險管理，以確保正確執行該等安全措施。具體措施包括：
- 要求工廠車間內安全通道暢通，安全綫標示清楚，各物品須擺放整潔有序、不凌亂、不超界；
- 針對不同工作性質和實際操作情況，為員工提供適當的工作服及個人防護裝備，如：安全帽、安全帶、口罩及護目鏡等；
- 向從事特鋼製造業務相關僱員提供安全培訓，包括應急管理、材料處理、機器防護及職業健康與安全；
- 員工進入各種罐體、有限空間、或者管道內工作前，必須根據現場氣體性質使用（氮氣、壓縮空氣、蒸汽）對罐體、有限空間、或者管道進行吹掃置換，經檢測合格安全後方可進入工作；
- 嚴禁在工作場所吸煙喝酒；

Environmental, Social and Governance Report

環境、社會及管治報告

- Safety and health notices and warning signs are posted;
- Education program on health and safety is held annually;
- Emergency and rescue drills are held regularly; and
- Meetings on safe working are held on an irregular basis.

In the financial year 2018, there was no breach of any relevant laws and regulations which have significant impact on the Group regarding provision of safe working environment and protecting staff from occupational hazards, nor any work-related injury incidents and negative issues in health and safety.

B.3. Development & Training

The Group attaches great importance to employees' growth and development, and has formulated an internal strategy for talent development and retention to enhance employees' work skills and improve their knowledge are provided. A series of internal practices including the Training and Management Implementation Articles are formulated. Trainings are divided into orientation training, job training and management training. Trainings may be in the form of centralized class, external training or self-studying. Annual staff training plan has been formulated by the Human Resources Department according to the requirements of various departments and is reviewed quarterly to assess whether the training programs meet their objectives.

- 建立工作安全健康公告及安全警示標誌;
- 每年舉行健康和安全教育;
- 定期開展應急救援演練; 及
- 不定期舉行安全工作會議等。

於二零一八財年，本集團在提供安全工作環境及保障僱員避免職業性危害方面，並無違反任何對本集團有重大影響的相關法律及規例，也未出現工傷事故或在健康及安全方面的任何負面問題。

B.3. 發展及培訓

集團重視員工成長和發展的重要性，並製定了人才培養和保留的內部戰略，以加強僱員的工作技能和提高其知識水準。本集團已制定內部培訓管理實施細則等一系列內部規例，將培訓分為入廠培訓、職能培訓、管理層培訓。培訓的形式一般是集中辦班、送外培訓及員工自學。人力資源部每年按各部門要求，制訂年度職工培訓計劃，並每一季度作回顧和檢討，評價其是否達到了培訓計劃要求所策劃的目標。

Environmental, Social and Governance Report

環境、社會及管治報告

Comprehensive pre-job training is provided to new staff for developing a good understanding of corporate culture, operational skills, professional knowledge, job knowledge, quality awareness, technical skills procedures and other procedures. Job training refers to relevant training and practice conducted by tutors as designated by the departments. Industry professionals are invited from time to time to conduct training or seminars for the management, and outstanding staff members are encouraged to participate in external training for enhancing their professional knowledge and competitiveness in the industry. For special operation staff, including internal auditors of the quality, environment, occupational health and safety management systems, they are required and supported by the Group to attain standard certificates of the corresponding skill levels, with subsidies provided for external training as the case may be.

In the financial year 2018, a series of regular training and development programs were held, encouraging employees to seek lifelong learning and fulfilling their occupational requirements. Some training activities held in the 2018 financial year are listed below:

- Laws and regulations;
- Occupational safety, health and protection;
- Town gas safety knowledge;
- Fire safety knowledge;
- Safety, technical and equipment maintenance standards;
- Typical safety accident cases;
- Employee safety rules;
- Basic knowledge of safety theory, etc.

對新入職僱員，本集團提供全面的職前培訓，讓彼等瞭解企業文化、操作技能、專業知識、崗位知識、質量意識教育、工藝技術規程及其他規程等。職能培訓是指由部門指定指導老師對員工進行相關培訓及實習。本集團不時邀請行業的專業人士為管理層進行培訓或舉辦講座，並鼓勵優秀員工參加外部培訓，提高其專業知識水平和行業競爭力。對於特殊作業人員，包括質量環境職業健康安全體系內審員，本集團要求並協助其取得相應技能等級標準證書，並根據情況提供員工參加外部培訓經費。

於二零一八財政年度，本集團舉辦一系列定期培訓及發展計劃，鼓勵僱員終身學習及幫助滿足其職業需求。以下為二零一八財政年度本集團舉辦的部分培訓活動的清單：

- 法律法規；
- 職業安全健康與防護；
- 煤氣安全知識；
- 消防安全知識；
- 安全、技術、設備維護作業標準；
- 典型安全事故案例；
- 員工安全守則；
- 安全理論基礎知識等。

Environmental, Social and Governance Report

環境、社會及管治報告

B.4. Labour Standards

Employment Ordinance (Cap. 57, Laws of Hong Kong), Labour Law of the PRC, Labour Contract Law of the PRC and other relevant labour laws and regulations in Hong Kong and Mainland China are strictly complied with by the Group to prohibit any child labour or forced labour.

To combat illegal employment of child labour, underaged labour and forced labour, Requirements of Staff Recruitment Management was formulated, which requires applicants to fill in the Staff Registration Form in detail and provide a copy of valid ID and account, small 2-inch photo in red background, body check report or health certificate, academic certificate(s), proof of job titles, letter of guarantee of employment, a copy of the ID or account of guarantor, proof of termination (dismissal) of employment from the original work unit (if any), etc. Person-in-charge of human resources file management of branch companies and affiliated units should check each item in accordance to the Checklist for New Recruits with all the above formalities provided fully prior to their employment, otherwise relevant employment procedures would not proceed. During the recruitment process, applicants are required to provide truthful and valid personal information. If it is found that false information is provided by the applicants, the Group are entitled to terminate their employment in accordance to relevant laws and regulations. The Human Resources Department of the Group should also ensure our compliance with the latest relevant laws and regulations regarding prevention of child labour and forced labour.

In the financial year 2018, there was no breach of any relevant laws and regulations which have significant impact on the Group regarding prevention of child labour or forced labour.

B.4. 勞工準則

本集團嚴格遵守《僱傭條例》（香港法例第57章）、《中華人民共和國勞動法》、《中華人民共和國勞動合同法》以及香港及中國的其他相關勞工法律及規例，以禁止僱用任何童工或強制勞工。

為打擊非法雇用童工、未成年勞工及強制勞工，本集團制定了《員工聘用管理規定》，要求集團確認雇用前，應徵者須詳細填寫《員工登記表》，並提供本人有效的身份證影本、戶口影本、小二寸紅底照片；體檢報告或健康證明、學歷證明、職稱證明；錄用員工擔保書、擔保人身份證影本或戶口影本、原工作單位終止（解除）勞動關係證明（如有）等。各分公司及所屬單位人事檔案管理相關負責人，應於員工入職前，按照《員工入職檢查清單》進行逐項檢查。所有手續必須在入職前完整提供，否則不能辦理入職相關手續。招聘過程中，本集團須要求應徵者提供真實有效的個人資料，若應徵者被發現提供虛假資訊，本集團有權依照有關法律、法規終止其就業。本集團的人力資源部門亦須確保本集團遵守禁止童工及強制勞工的最新相關法律及規例。

於二零一八財年內，本集團在防止童工或強制勞工方面，並無違反任何對本集團有重大影響的相關法律及規例。

Environmental, Social and Governance Report

環境、社會及管治報告

Operating Practice

B.5. Supply Chain Management

Due to the characteristics of the special steel manufacturing business, a stable and environmentally friendly supply chain is of vital importance to the Group. As an enterprise which considers the fulfillment of social responsibility as fundamental principle, suppliers are required to actively shoulder environmental and social responsibilities. Each of our operating subsidiaries strictly and constantly monitors the quality of their suppliers and practice of supply chains. By the comprehensive assessment on potential suppliers, thorough investigation on selected suppliers, stringent quality standards on raw materials and services from suppliers and regular reviews of their products, services, social and environmental commitment, we seek to establish sustainable strategies and system of supply chain management and maintain sound long-term partnership with suppliers.

In the financial year 2018, the Group engaged primarily in manufacturing and sales of special steel. The Group purchase raw materials from suppliers, which are mainly coking coal, anthracite, high carbon iron, electrolytic manganese and silicon iron. Our suppliers are selected according to rules and regulations such as "Procedures for Procurement Control of Raw Materials" and on the basis of corporate nature, production specifications, product quality, standards of management, technical conditions, record of annual production capacity, reputation and proof of relevant qualifications and legitimate production/enterprise operation. Field visits will be conducted as needed to select suppliers who can provide quality service, taking into account the actual conditions of the production site. Suppliers are required to abide by national and local laws and regulations and sign the Commitment to Anti-Corruption for Suppliers. Qualified suppliers will be listed in the "Qualified Suppliers File" (《合格供應商檔案》) by our supplier review team for an annual review of quality system, execution standards, production methods etc. of the suppliers using the Review List of Qualified Suppliers.

營運慣例

B.5. 供應鏈管理

由於特鋼製造業務的特性，穩定、環保的供應鏈對本集團至關重要。作為一個把履行社會責任為基本方針的企業，本集團要求供應商積極並承擔環境及社會責任。本集團內各營運附屬公司嚴格持續地監察其供應商的品質及供應鏈慣例。通過對潛在供應商進行全面評估、對選定供應商進行徹底調查、對供應商的原材料及服務質素實施嚴格標準、以及定期審查供應商產品服務及其社會及環境責任，本集團務求建立一個可持續的供應鏈管理戰略和系統，並與供應商保持長期良好的合作關係。

於二零一八財年，本集團的經營業務主要為特鋼生產及銷售。本集團從供應商處購買原材料，主要為焦煤、無煙煤、高碳鑄鐵、電解錳及矽鐵等。在篩選供應商時，本集團根據規章制度，如：《原材料採購控制程序》，並基於企業性質、生產規格、產品質量、管理水平、技術狀況、年產量記錄、聲譽、及有相關的資質證明及合法生產／經營企業証明等，需要時還會進行實地考察，同時根據生產現場實際，選擇高服務質量的供應商。本集團要求供應商遵守國家和當地的法律法規，並且讓其簽訂供應商廉潔承諾書。供應商評審小組會把符合資格的供應商列入《合格供應商檔案》中。本集團每年亦以合格供應商評審表的形式對供應商的質量體系、執行標準、生產方式等進行年度考核。

Environmental, Social and Governance Report

環境、社會及管治報告

To ensure sufficient supply, the annual supply agreement with suppliers is usually signed with prices, procurement, products delivery and payment arrangement stated clearly in the agreement. Several suppliers will be visited at the same time for coping with supply shortage or price increase of the suppliers. For example, backup suppliers will be hired in case of supply shortage. Ongoing and stringent monitoring and assessment of follow-up management of selected suppliers are conducted, including regular visits to factories of approved suppliers for reviewing their actual production, long-term supply capacity, on-site management and changes of management staff.

The Group attaches great importance to the communication with suppliers for building mutual trust and enters into supply contracts with them based on the requirements of projects. In case of products to be supplied by the supplier during the contracted period fail to meet the agreed requirement specified in the contract, the Group shall timely notify the supplier, commence active discussion to minimize losses and remedy the situation, and shall track the rectification plans afterwards.

B.6. Product Responsibility

The Group strictly adheres to relevant product laws and regulations to strengthen the monitoring of product safety and quality, including but not limited to:

- Product Quality Law of the PRC;
- Metrology Law of the PRC;
- Standardization Law of the PRC;
- Production Safety Law of the PRC; and
- Advertising Law of the PRC.

In the financial year 2018, there was no breach of any relevant laws and regulations which have significant impact on the Group regarding product/service quality, health and safety, advertising, labelling and rights of privacy.

為確保供應充足，本集團通常與供應商訂立年度供貨協定。協定中列明定價、採購、交貨及付款安排。本集團同時考察多家供應商以應對供應商供貨短缺或定價上升，如供貨短缺則使用備用供應商等。本集團在對選定供應商的後期管理方面進行持續嚴格的監管及評估，包括定期到合格供應商的企業廠房進行探訪並檢查其實際生產情況、持續供貨能力、現場管理情況及管理人員變動等。

本集團十分重視與供應商的溝通以建立互信，並會根據項目需要與彼等訂立供應合約。供應商在正式的供貨期間，如發現貨品未達到合同約定的要求，本集團將及時通知供應商，積極協商在最小損失下展開補救工作，並跟蹤整改方案。

B.6. 產品責任

本集團嚴格遵守產品的相關法律法規，以加強監管產品安全品質，包括但不限於：

- 《中華人民共和國產品質量法》；
- 《中華人民共和國計量法》；
- 《中華人民共和國標準化法》；
- 《中華人民共和國安全生產法》；及
- 《中華人民共和國廣告法》。

於二零一八財年，本集團沒有發現任何違反對本集團有重大影響的有關產品／服務的品質、健康與安全、廣告、標籤和隱私權相關法律法規的行為。

Environmental, Social and Governance Report

環境、社會及管治報告

The Group strives to meet the quality, technical and safety standards recognized by the country and industry. The execution standards of its main products, i.e. bearing steel, stainless steel and alloy steel, mainly include:

- GB/T 18254-2002 of "High carbon chromium bearing steel";
- GB 3203-1982 of "Cementite bearing steel";
- GB/T 1220-2007 of "Stainless steel bar";
- GB/T 4356-2002 of "Stainless steel wire rod";
- GB/T 4237-2015 of "Hot-rolled stainless steel sheet and stripe";
- GB/T 3280-2015 of "Cold-rolled stainless steel sheet and stripe";
- GB/T 3077-2015 of "Alloy structural steel"; and
- GB/T 1299-2000 of "Alloy tool steel", etc.

The Group's factories have met the accreditation standards of ISO9001 Quality Management System, ISO14001 Environmental Management System, OHSAS18001 Occupational Health and Safety Management System Certification. Meanwhile, the Group promptly perfected process standards, exercised strict control over production process, improved the products quality, factory environment, occupational health and safety and energy management constantly according to actual circumstances and requirements of the latest laws, regulations and product quality standards, aiming at enhancing customer satisfaction.

本集團致力維持產品符合國家及行業認可之質量技術及安全標準，其主要產品軸承鋼、不銹鋼以及合金鋼符合的執行標準主要包括：

- GB/T 18254-2002《高碳鉻軸承鋼》；
- GB 3203-1982《滲碳軸承鋼》；
- GB/T 1220-2007《不銹鋼棒材》；
- GB/T 4356-2002《不銹鋼盤條》；
- GB/T 4237-2015《不銹鋼熱軋鋼板和鋼帶》；
- GB/T 3280-2015《不銹鋼冷軋鋼板和鋼帶》；
- GB/T 3077-2015《合金結構鋼》；及
- GB/T 1299-2000《合金工具鋼》等。

本集團的工廠通過ISO9001質量管理體系、ISO14001環境管理體系、OHSAS18001職業健康安全管理体系認證標準，同時根據本集團實際情況及最新法律法規、產品質量標準，及時完善工藝標準、嚴格落實控制生產環節、持續改進其產品品質、工廠環境、職業健康和能源管理，致力於增強顧客滿意度。

Environmental, Social and Governance Report

環境、社會及管治報告

Technical Department of the Group establishes the goal and standards for product quality with comprehensive control of products safety and quality implemented by in-house laboratories of the Quality Inspection Centre according to the inspection procedures and quality tests on steel billets, semi-finished products and finished products conducted with reference to the technical requirements (including tests on radiation sources, smelting chemical contents, physical properties and appearance). Products which have passed the tests will be issued with "Quality Guarantee Certificates" so as to ensure the production process is in control and the products are safe and reliable. In addition to internal testing, sample inspection through independent third parties is conducted on a regular basis. If half-finished or finished products are found not meeting specifications, the quality inspection department will assess, label, record and isolate such products in accordance with the internal "Control Procedure of Sub-standard Products", and will also negotiate with the customers for improvement measures and report to the Group timely. Subsequently, customers will be contacted for product recall and follow-up actions, such as re-production or modification of the products concerned until the requirements of the customers are met.

"Measures for Handling and Managing Customers' Complaints" is formulated by the Group with research on customers conducted regularly in which their opinions are collected. The work is solely responsible by the operation department, which mainly involves collecting and summarizing customers' opinion, investigating causes of problems and suggesting solutions for the system. The Group attaches great importance to complaint handling and keeps learning from experience for further enhancement of quality of products and service, thereby maintaining long-term competitiveness in the market.

本集團技術部確立產品質量目標及標準，由質量檢測部中心的自設化驗室按檢驗規程全線監控產品安全及品質，並依據技術要求進行相關的鋼坯、半成品及成品的品質試驗，如輻射源檢測、冶煉化學成分檢測、物理性能及外觀檢測等，試驗合格後會出具《質量保證書》確保生產過程得到控制及產品安全可靠。除了內部檢測，本集團亦透過獨立第三方公司定期進行樣本檢驗。若發現半成品或成品不合規格，質量檢驗部按內部《不合格品控制程序》會對不合格品作評判、標識、記錄、隔離及與客戶主動協商，商討改善方法及向本集團作出及時反饋。其後，彼等將聯繫客戶回收產品，並採取跟進行動，如：回爐重新生產或改進，直至滿足客戶要求。

本集團制定《顧客投訴處理管理辦法》，定期開展針對顧客的調研活動並進行意見收集。該項活動由經營部統一負責，主要為收集與匯總顧客意見，查找問題原因，提出系統的解決辦法。本集團對投訴高度關注，不斷吸取教訓和累計經驗，進一步加強本集團的產品及服務品質，從而使本集團在市場上保持長期競爭力。

Environmental, Social and Governance Report

環境、社會及管治報告

The Group adheres strictly to the laws and regulations regarding customers' privacy, such as the Law of the PRC on Protection of Consumer Rights and Interests, Personal Data (Privacy) Ordinance (Cap. 486, Laws of Hong Kong), etc to ensure customers' rights are protected. The Group has set up a sound monitoring system which aims at protecting customers' personal information and privacy, while taking safety measures to prevent data loss or leakage, which include:

- Classifying and defining the scope of commercial confidentiality and placing the relevant documents in the designated safe regions;
- Entering into confidentiality agreements with internal and external parties, such internal confidentiality regulation and practices are strictly executed; and
- Educating our employees and raising their awareness of commercial secrets and confidentiality of other patented intellectual property.

In the financial year 2018, there was no breach of any relevant laws and regulations which have significant impact on the Group regarding health and safety, advertising, labelling and privacy matters of its products.

B.7. Anti-corruption

To maintain a fair, honest and highly efficient business and working environment, the Group attaches great importance to staff integrity and requires employees to uphold the ethics and code of conduct to work diligently. It also adheres strictly to the anti-corruption and anti-bribery laws and regulations promulgated by the PRC and HKSAR, including but not limited to the Anti-money Laundering Law of the PRC, the Prevention of Bribery Ordinance (Cap 201, Laws of Hong Kong), etc.

本集團嚴格遵守有關客戶隱私的法律法規，如《中華人民共和國消費者權益保護法》、《個人資料（隱私）條例》（香港法例第486章）等，以確保客戶的權利受到保護。本集團設有完善的監管體系來保護客戶的個人資料及隱私，並設有安全措施防止資料丟失或外泄，措施包括：

- 分類及界定商業機密的範圍，並將相關文件存放於指定的安全區域；
- 與內部及外部人士簽訂保密協議，嚴格執行本集團的內部保密規則及規例；及
- 教育僱員及加強僱員對商業秘密及其他專有知識產權的保密意識等。

於二零一八財政年度內，本集團並無違反任何對本集團有重大影響的有關其產品的健康與安全、廣告、標籤及私隱事宜方面的相關法律及規例。

B.7. 反貪污

為維持一個公平、具有誠信及高效率的業務及工作環境，本集團高度重視員工誠實守信，盡職盡責的道德理念及行為守則，並嚴格遵守中國及香港政府頒布的反貪污及賄賂的法例及規例，包括但不限於《中華人民共和國反洗錢法》、《防止賄賂條例》（香港法例第201章）等。

Environmental, Social and Governance Report

環境、社會及管治報告

Furthermore, the Group has established and enforced the anti-corruption policy as stipulated in the staff manual. It has zero tolerance towards corruption. All employees are expected to comply with the ethical requirements and discharge duties in an honest and self-disciplined manner. The Group forbids staff from engaging in any activities related to bribery, extortion, fraud and money-laundering that may cause them to make decisions against the interest of the Group in the course of business operation.

The Group conducts investigation on suspicious or illegal behaviours in relation to bribery, extortion, fraud and money laundering so as to protect its interests. It has introduced the relevant internal procedures for evaluation, consultation, investigation and penalty. Moreover, whistleblower may report any suspected misconduct orally or in writing with full details and supporting evidence to the Risk Management Department, Internal Control Department or the senior management of the Group. The Group shall conduct investigation, evidence collection and handling at the foremost. The Group advocates a confidential mechanism to protect the whistleblowers from unfair dismissal or harm. Where criminality is suspected, a report will be made to the relevant monitoring institute or law enforcement departments when necessary.

In the financial year 2018, there was no breach of any relevant laws and regulations which have significant impact on the Group regarding prevention of bribery, extortion, fraud and money-laundering.

此外，本集團已制定並嚴格執行員工手冊中規定的反貪污政策，絕不容忍任何形式的貪污。本集團要求所有員工必須嚴格遵守職業道德規範，並以誠信及自律的方式履行職責，不得參與任何與賄賂、勒索、欺詐、洗黑錢有關的以及可能影響彼等於業務過程中作出損害本集團利益的決策的活動。

本集團將對與賄賂、勒索、欺詐及洗黑錢有關的任何可疑或非法行為進行調查，以保護本集團的利益。為此，本集團已建立相關評估、諮詢、調查及處罰的內部反貪污程序。此外，舉報者可就任何可疑不當行為向風險管理部門、內部審核部門或本集團高級管理層進行口頭或書面報告，並提供詳盡細節及支持證據，本集團將會於第一時間進行調查、取證和處理。本集團提倡保密機制，以保護舉報者免遭不公平的解僱或傷害。對於涉嫌犯罪的事件，本集團將於必要時向相關監管機關或執法部門報告。

於二零一八財政年度內，本集團並無違反任何對本集團有重大影響的防止賄賂、勒索、欺詐及洗黑錢方面的相關法律及規例。

Environmental, Social and Governance Report

環境、社會及管治報告

Community

The Group has always placed its concerted effort in caring and giving back to the community and abides by the value to benefit the society throughout its development. It believes that business and the community are inseparable as a whole since business growth can drive community development in ways such as promoting employment rate and increasing tax revenue, which provide economic and social security for the community. Other than encouraging its staff to keep a work-life balance, the Group also motivates them to participate in community and charity activities. The Group upholds that such active participation not only creates a more meaningful and energetic life for staff, but also profoundly promotes the sustainable development of the society. This in turn realizes a harmonious development of both corporate and society.

The Group believes “whatever is taken from the people ought to be used for the people”, hence it strives to improve and promote local economic development and living standards while pursuing corporate development. The Group upgraded the equipment and facilities of the community on a timely basis in accordance with the latest local policies, aiming at improving local residents’ quality of life.

At the same time, the Group also engaged experts and professional safety personnel according to the actual situation, and organised safety speeches by taking into account the actual conditions of the Group’s working site. Each year, the Group regularly conducts emergency response plan exercises and other drills to enhance employees’ safety awareness and self-rescue capabilities so as to reduce losses in the case of an accident.

Looking ahead, the Group hopes to strengthen its governance of environmental protection and increase its investment in social welfare, so that it creates self-value while also be able to give back to the neighbouring communities and contribute to society.

社區

本集團一直致力於關懷並回饋社會，恪守集團造福社會的發展觀和價值觀。本集團認為企業和社區是不可分割的整體，企業發展需要為社區發展起到帶動作用，例如提高就業率，增加稅收，為社區發展提供了經濟和社會保障等。除了鼓勵員工保持工作與生活之間的平衡外，本集團還鼓勵員工多參與社區與慈善活動。本集團堅信，讓員工積極參與社區活動，不僅可以為員工創造更有意義和更有活力的生活方式，還能極大地促進社會的可持續發展，真正意義上做到企業社會的和諧發展。

本集團秉承著「取之於民，回報社會」的思想觀念，致力於通過公司的發展來改善並且促進周邊居民社區的經濟發展水準與生活環境。本集團根據當地最新政策，及時對小區的設備、設施等進行技術升級改造以提升當地居民的生活品質。

同時，本集團還根據實際情況聘請專家和專業安全人員，結合集團作業現場實際舉辦安全演講。每年本集團都會定期開展事故應急預案練習、演習活動，以增加員工安全自防能力，降低事故發生時的損失。

本集團希望在將來加強環保治理，增加社會公益投入，在創造自身價值的同時，回報周邊社區，為社會建設出一份力。

Environmental, Social and Governance Report

環境、社會及管治報告

VII. REPORT DISCLOSURE INDEX

VII. 報告披露索引

Aspect 層面	Key Performance Indicators 關鍵績效指標	Description 說明	Page 頁碼
A. Environmental			
A. 環境			
A.1. Emissions	General disclosure	Information on: (A) the policies; and (B) compliance with relevant laws and regulations that have a significant impact to the issuer relating to air and greenhouse gas emission, discharges into water and land, and generation of hazardous and non-hazardous waste.	11
A.1. 排放物	一般披露	有關廢氣及溫室氣體排放、向水及土地的排污、有害及無害廢棄物的產生等的： (A) 政策；及 (B) 遵守對發行人有重大影響的相關法律及規例的資料。	
	Key performance indicators A1.1 關鍵績效指標A1.1	The types emissions and respective emission data.	12
	Key performance indicators A1.2 關鍵績效指標A1.2	排放物種類及相關排放資料。	
	Key performance indicators A1.2 關鍵績效指標A1.2	Greenhouse gas emissions in total (in tonnes) and, where appropriate, intensity.	12
	Key performance indicators A1.2 關鍵績效指標A1.2	溫室氣體總排放量（以噸計算）及（如適用）密度。	
	Key performance indicators A1.3 關鍵績效指標A1.3	Total hazardous waste produced (in tonnes) and, where appropriate, intensity.	12
	Key performance indicators A1.3 關鍵績效指標A1.3	所產生有害廢棄物總量（以噸計算）及（如適用）密度。	
	Key performance indicators A1.4 關鍵績效指標A1.4	Total non-hazardous waste produced (in tonnes) and, where appropriate, intensity.	12
	Key performance indicators A1.4 關鍵績效指標A1.4	所產生無害廢棄物總量（以噸計算）及（如適用）密度。	
	Key performance indicators A1.5 關鍵績效指標A1.5	Description of measures to mitigate emissions and the results achieved.	13
	Key performance indicators A1.5 關鍵績效指標A1.5	描述減低排放量的措施及所得成果。	
	Key performance indicators A1.6 關鍵績效指標A1.6	Description of how hazardous and non-hazardous wastes are handled, reduction initiatives and results achieved.	15
	Key performance indicators A1.6 關鍵績效指標A1.6	描述處理有害及無害廢棄物的方法、減低產生量的措施及所得成果。	

Environmental, Social and Governance Report

環境、社會及管治報告

Aspect 層面	Key Performance Indicators 關鍵績效指標	Description 說明	Page 頁碼
A.2. Use of Resources	General disclosure	Policies on the efficient use of resources (including energy, water and other raw materials).	16
A.2. 資源使用	一般披露	有效使用資源（包括能源、水及其他原材料）的政策。	
	Key performance indicators A2.1 關鍵績效指標A2.1	Direct and/or indirect energy consumption by type in total and intensity.	16
	Key performance indicators A2.2 關鍵績效指標A2.2	按類型劃分的直接及／或間接能源總耗量及密度。	
	Key performance indicators A2.3 關鍵績效指標A2.3	Water consumption in total and intensity.	16
	Key performance indicators A2.4 關鍵績效指標A2.4	總耗水量及密度。	
	Key performance indicators A2.5 關鍵績效指標A2.5	Description of energy use efficiency initiatives and results achieved.	17
	Key performance indicators A2.6 關鍵績效指標A2.6	描述能源使用效益計畫及所得成果。	
	Key performance indicators A2.7 關鍵績效指標A2.7	Description of whether there is any issue in sourcing water that is fit for purpose, water efficiency initiatives and results achieved.	18
	Key performance indicators A2.8 關鍵績效指標A2.8	描述求取適用水源上可有任何問題，以及提升用水效益計畫及所得成果。	
	Key performance indicators A2.9 關鍵績效指標A2.9	Total packaging material used for finished products and, if applicable, with reference to per unit produced.	20
	Key performance indicators A2.10 關鍵績效指標A2.10	製成品所用包裝材料的總量及（如適用）每生產單位佔量。	
A.3. Environment and Natural Resources	General disclosure	Policies on minimising the issuer's significant impact on the environment and natural resources.	21
A.3. 環境及天然資源	一般披露	減低發行人對環境及天然資源造成重大影響的政策。	
	Key performance indicators A3.1 關鍵績效指標A3.1	Description of the significant impacts of activities on the environment and natural resources and the actions taken to manage them.	21
	Key performance indicators A3.2 關鍵績效指標A3.2	描述業務活動對環境及天然資源的重大影響及已採取管理有關影響的行動。	

Environmental, Social and Governance Report

環境、社會及管治報告

Aspect 層面	Key Performance Indicators 關鍵績效指標	Description 說明	Page 頁碼
B. Society B. 社會 Employment and Labour Standards 僱傭及勞工常規			
B.1. Employment	General disclosure	Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact to the issuer relating to compensation and dismissal, recruitment and promotion, working hours, rest periods, equal opportunity, diversity, anti-discrimination, and other benefits and welfare.	22
B.1. 僱傭	一般披露	有關薪酬及解僱、招聘及晉升、工作時數、假期、平等機會、多元化、反歧視以及其他待遇及福利的： (a) 政策；及 (b) 遵守對發行人有重大影響的相關法律及規例的資料。	
B.2. Health and Safety	General disclosure	Information on: (a) the policies; and (b) compliance with laws and regulations of significant impact to the issuer relating to providing of safe working environment and protecting of employees from occupational hazards.	25
B.2. 健康與安全	一般披露	有關提供安全工作環境及保障僱員避免職業性危害的： (a) 政策；及 (b) 遵守對發行人有重大影響的相關法律及規例的資料。	
B.3. Development & Training	General disclosure	Policies on improving employees' knowledge and skills for discharging duties at work. Description of training activities.	27
B.3. 發展及培訓	一般披露	有關提升僱員履行工作職責的知識及技能的政策。描述培訓活動。	
B.4. Labour Standards	General disclosure	Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact to the issuer relating to preventing child and forced labour.	29
B.4. 勞工準則	一般披露	有關防止童工或強制勞工的： (a) 政策；及 (b) 遵守對發行人有重大影響的相關法律及規例的資料。	

Environmental, Social and Governance Report

環境、社會及管治報告

Aspect 層面	Key Performance Indicators 關鍵績效指標	Description 說明	Page 頁碼
Operating Practices 營運慣例			
B.5. Supply Chain Management	General disclosure	Policies on managing environmental and social risks of the supply chain.	30
B.5. 供應鏈管理	一般披露	管理供應鏈的環境及社會風險政策。	
B.6. Product Responsibility	General disclosure	Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact to the issuer relating to health and safety, advertising, labelling and privacy matters relating to products and services provided and methods of redress.	31
B.6. 產品責任	一般披露	有關所提供產品和服務的健康與安全、廣告、標籤及私隱事宜以及補救方法的： (a) 政策；及 (b) 遵守對發行人有重大影響的相關法律及規例的資料。	
B.7. Anti-corruption	General disclosure	Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact to the issuer relating to bribery, extortion, fraud and money laundering.	34
B.7. 反貪污	一般披露	有關防止賄賂、勒索、欺詐及洗黑錢的： (a) 政策；及 (b) 遵守對發行人有重大影響的相關法律及規例的資料。	
Community 社區			
B.8. 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.	36
B.8. 社區活動投資	一般披露	有關以社區參與來瞭解營運所在社區需要和確保其業務活動會考慮社區利益的政策。	

鎳資源國際控股有限公司
NICKEL RESOURCES INTERNATIONAL
HOLDINGS COMPANY LIMITED