

CULTURECOM



文化傳信集團有限公司

(於百慕達註冊成立之有限公司)

(股份代號：00343)

CULTURECOM HOLDINGS LIMITED

(Incorporated in Bermuda with limited liability)

(Stock Code : 00343)

2020

環境、社會及管治報告
Environmental, Social
and Governance
Report



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SCOPE AND REPORTING YEAR

範疇及報告年度

Culturecom Holdings Limited (hereinafter referred as the “Company”, and together with its subsidiaries referred as the “Group”) is pleased to publish the Environmental, Social, and Governance (the “ESG”) report, highlighting its ESG performance, with disclosure reference made to the ESG Reporting Guide as described in Appendix 27 to the Rules Governing the Listing of Securities on the Stock Exchange of Hong Kong Limited (the “Listing Rules”) Guidance set out by The Stock Exchange of Hong Kong Limited (the “HKex”).

The Group is principally engaged in traditional publishing, Intellectual Properties (“IPs”) licensing business, Digital Marketing, Online and Social Business, retailing and wholesales business. This ESG report covers the Group’s overall performance in two subject areas, namely, Environmental and Social of key business operations in Hong Kong and the People’s Republic of China (the “PRC”), from 1 April 2019 to 31 March 2020 (the “Reporting Period”), unless otherwise stated. The business operations to be reported include:

- the office in Admiralty, Hong Kong (hereafter the “Admiralty office”);
- the office in Tsuen Wan, Hong Kong (hereafter the “Tsuen Wan office”);
- the warehouse in Tsuen Wan, Hong Kong (hereafter the “Tsuen Wan warehouse”);
- the office in Guangzhou, the PRC (hereafter the “Guangzhou office”);
- the office in Luoding, the PRC (hereafter the “Luoding office”); and
- the office in Beijing, the PRC (hereafter the “Beijing Office”).

文化傳信集團有限公司(以下簡稱「本公司」, 連同其附屬公司統稱「本集團」)欣然刊發此份環境、社會及管治(「環境、社會及管治」)報告, 主要匯報本集團於環境、社會及管治方面的表現, 並參考香港聯合交易所有限公司(「聯交所」)所訂香港聯合交易所有限公司證券上市規則(「上市規則」)附錄二十七所載《環境、社會及管治報告指引》作出披露。

本集團主要從事傳統出版及知識產權(「知識產權」)授權業務、數碼化市場推廣、線上及社交業務以及零售與批發業務。除另有指明外, 本環境、社會及管治報告涵蓋本集團香港及中華人民共和國(「中國」)主要業務營運的兩個主要範疇(即環境及社會範疇)於二零一九年四月一日至二零二零年三月三十一日(「報告期間」)的整體表現。本文將報告的業務營運包括:

- 於香港金鐘的辦公室(下稱「金鐘辦公室」);
- 於香港荃灣的辦公室(下稱「荃灣辦公室」);
- 於香港荃灣的倉庫(下稱「荃灣倉庫」);
- 於中國廣州的辦公室(下稱「廣州辦公室」);
- 於中國羅定的辦公室(下稱「羅定辦公室」); 及
- 於中國北京的辦公室(下稱「北京辦公室」)。

SCOPE AND REPORTING YEAR 範疇及報告年度

There are two major operational changes during the Reporting Period. The Group disposed its catering business in Macau and acquired subsidiaries in Beijing, serve as an important new revenue segment of Digital Marketing.

The board of Directors of the Company (the “Board”) acknowledged that it has overall responsibility for the Group’s ESG strategy and reporting and for evaluating and determining the Group’s ESG-related risks. The Group has complied with all the “comply or explain” provisions set out in the ESG Reporting Guide during the Reporting Period.

報告期間有兩項主要業務變動。本集團出售其於澳門的飲食業務以及收購在北京的附屬公司。該等附屬公司為數碼化市場推廣的重要新收入分部。

本公司董事會(「董事會」)深明其對本集團的環境、社會及管治策略及報告的責任，以及評估及釐定本集團的環境、社會及管治相關風險。本集團於報告期間一直遵守環境、社會及管治報告指引所載的所有「不遵守就解釋」條文。

STAKEHOLDERS' ENGAGEMENT AND MATERIALITY

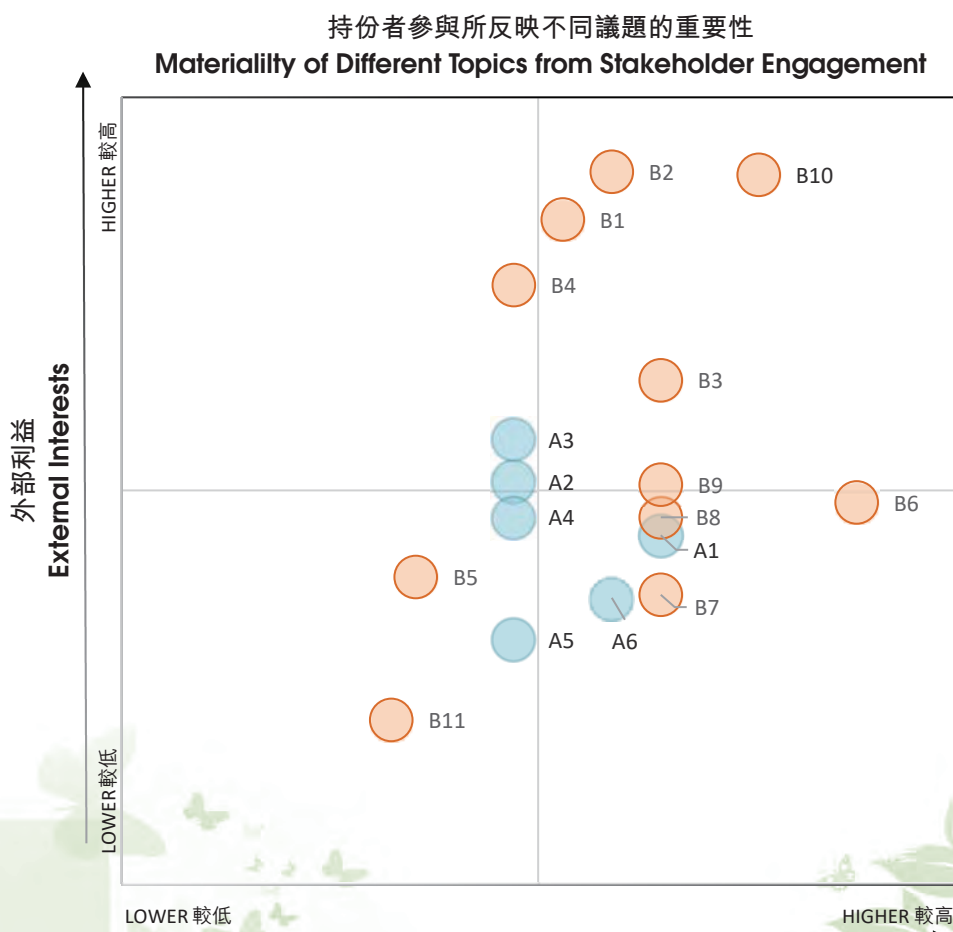
持份者參與及重要性

The Group values input and feedback of its stakeholders as they bring potential impacts to the Group's business. During the Reporting Period, the Group has specifically engaged its internal and external stakeholders including frontline staff, management, customers and suppliers to gain further insights on material aspects and challenges on its ESG matters via questionnaires. Based on the feedback collected from different groups of stakeholders, a materiality matrix was developed.

鑑於持份者可為本集團的業務帶來潛在影響，本集團十分重視持份者的意見與反饋。於報告期間，本集團特別與其前線員工、管理層、客戶及供應商等內部及外部持份者進行溝通，透過問卷調查汲取彼等對本集團環境、社會及管治事宜的重要層面及挑戰的見解。本集團從不同組別持份者收集到反饋，並以此為基礎制定重要性矩陣。

Materiality Matrix

重要性矩陣



STAKEHOLDERS' ENGAGEMENT AND MATERIALITY

持份者參與及重要性

Materiality Matrix (Continued)

A. Environmental	
Energy	A1
Water	A2
Air Emission	A3
Waste and Effluent	A4
Other Raw Materials Consumption	A5
Environmental Protection Measures	A6
B. Social	
Employment	B1
Occupational Health and Safety	B2
Development and Training	B3
Labour Standards	B4
Supplier Management	B5
Intellectual Property	B6
Data Protection	B7
Customer Service	B8
Product/Service Quality	B9
Anti-corruption	B10
Community Investment	B11

Among the environmental and social aspects, the followings have been deemed as the most important by stakeholders:

- Anti-corruption;
- Occupational Health and Safety;
- Employment;
- Development and Training; and
- Labour Standard.

Key material issues raised by the stakeholders focused on social aspects. Environmental aspects, on the other hand, were considered less important. The key material aspects will be strictly managed through the Group's policies and guidelines. The Group will continue to improve its ESG management and performance by actively communicating with its stakeholders and constantly reviewing and improving its internal policies.

重要性矩陣(續)

A. 環境	
能源	A1
水	A2
廢氣排放	A3
廢棄物及廢水	A4
其他原料耗量	A5
環保措施	A6
B. 社會	
僱傭	B1
職業健康與安全	B2
發展及培訓	B3
勞工準則	B4
供應商管理	B5
知識產權	B6
資料保障	B7
客戶服務	B8
產品／服務質素	B9
反貪污	B10
社區投資	B11

在環境及社會層面方面，以下為持份者視為最重要的事項：

- 反貪污；
- 職業健康與安全；
- 僱傭；
- 發展及培訓；及
- 勞工準則。

持份者提出的關鍵重大議題集中於社會層面。另一方面，環境層面則被視為較次要。關鍵重大層面將按本集團的政策及指引加以嚴格管理。本集團將積極與持份者溝通，並不斷檢討及改善其內部政策，繼續改善其環境、社會及管治管理及表現。

STAKEHOLDERS' FEEDBACK

持份者反饋

The Group welcomes stakeholders' feedback on the environmental, social and governance approach and performance by giving suggestions or share views via email at ir@culturecom.com.hk.

本集團歡迎持份者就環境、社會及管治方針及表現提出反饋，透過電郵至 ir@culturecom.com.hk 提供建議或分享意見。

THE GROUP'S COMMITMENT ON ESG

本集團於環境、社會及管治的承擔

MISSION AND VISION ON ESG

The Group was one of the original founding members of the Hong Kong Comics and Animation Federation Limited, founded in 1999. The Group's long-term business focus closely aligns with the Group's overall vision on Environment, Social and Governance. As the global trend shows persistent decline in the traditional publishing industry, the Group has strategically regarded IPs licensing business and Digital Marketing as the Group's main development focus. The Group will place most of its resources on digitalization of its IPs and adopt online technologies for Digital Marketing. Compared with traditional publishing, information digitalization will bring environmental benefits, such as saving forest resources, increasing supply chain efficiency, and reducing resource consumption.

In addition, the Group is actively expanding its business and influence in mainland China, especially in Guangzhou and Beijing. The Group believes that expanding its business demographic network and expertise in mainland China will bring enormous benefits to the Group's future development and help promote its IPs licensing business and Digital Marketing business. While this decision is financially dominated, the Group believes that by expanding its IPs business, the Group can bring in its own expertise and knowledge to contribute to reinforcing a stronger, more standardized IPs market in mainland China. Moreover, the Group believes that such capacity building has a broader social impact. Through its business operations, more people will be educated and become more literate about the IPs and Digital Marketing knowledge in this information era that can minimize the possible infringements of the relevant patents or trademarks protected inventions, items or products in mainland China.

環境、社會及管治的使命及展望

本集團為創辦於一九九九年的香港動漫畫聯合有限公司的原創辦成員之一。本集團的長期業務重心與本集團對環境、社會及管治的整體展望密切相關。鑑於全球趨勢顯示傳統出版業持續走下坡，本集團已策略性地以知識產權授權業務及數碼化市場推廣為本集團的主要發展重心。本集團將其大部分資源投放於知識產權數碼化方面，並於數碼化市場推廣中採用線上技術。與傳統出版相比較，資料數碼化將為環境帶來諸多益處，例如節省樹木資源、提升供應鏈效率及減少資源消耗。

此外，本集團現正積極擴充其於中國內地（尤其是廣州及北京）的業務及影響力。本集團相信，拓展其中國內地業務的人口網絡及專業知識將為本集團的未來發展帶來龐大裨益，並有助推動其知識產權授權業務及數碼化市場推廣業務。儘管該項決定主要涉及資金方面，惟本集團相信，透過擴充其知識產權業務，本集團可憑藉自身專業及知識助力中國內地打造一個更強大、更標準化的知識產權市場。再者，本集團相信，該項能力建設可帶來更廣泛的社會影響。透過其業務營運，在當今資訊年代，更多人可接觸並更深入瞭解有關知識產權及數碼化市場推廣的知識，有助將中國內地受相關專利或商標保護的發明、項目或產品遭到侵權的可能性降至最低。

THE GROUP'S COMMITMENT ON ESG

本集團於環境、社會及管治的承擔

CONTINUOUS IMPROVEMENT AND MONITORING

The Group strives for continuous improvement and has established the following targets and goals for the near future:

- Evaluating and implementing low-cost measures, capital improvements and new technologies to improve the performance of related investment projects;
- Providing training to our employees, including the ESG issues, self-assessment and development training, use of sustainable material and recycling information, etc.; and
- Transparently disclosing our ESG approaches to suppliers and other business partners to enhance the communication among all the parties.

The management team is responsible for monitoring the Group's ESG related performance and reporting to the Board when necessary. The following means are used for monitoring:

- Referring to previous years' assessments, the Group's annual reports and ESG reports on environmental protection, social responsibility and corporate governance;
- Linking relevant matters that significantly affect the Group's operation in the ESG aspects; and
- Identifying any significant risks in respect to the Group's impact on health, safety, environment and society issues.

持續改善及監察

本集團持續精益求精，為不久將來制訂以下目標：

- 評估及實施低成本措施、資本改善及新技術，以改善相關投資項目的表現；
- 為我們的僱員提供培訓，包括環境、社會及管治事宜、自我評估及發展培訓、可持續物料的使用及回收資訊；及
- 向供應商及其他業務合作夥伴披露我們的環境、社會及管治方針，以加強各方之間的溝通。

管理層團隊負責監察本集團環境、社會及管治相關表現，並在必要時向董事會報告。管理層團隊已應用以下方法以作監察：

- 參照有關環境保護、社會責任及企業管治方面的過往年度評估、本集團年報以及環境、社會及管治報告；
- 聯繫對本集團營運有重大影響的環境、社會及管治方面相關事宜；及
- 識別對本集團於健康、安全、環境及社會事宜的影響的任何重大風險。

A1. Emissions

As a non-manufacturing company, the Group poses insignificant negative impacts on the environment. The Group does not produce exhaust gas and hazardous waste emissions in daily operations. Direct and indirect environmental impacts generated by the Group are mainly from the following activities: 1) consumption of gasoline (for Group-owned vehicles) and purchased electricity; 2) business air travel; and 3) paper and water consumption.

The Group strictly abides by laws, rules and regulations enforced by the PRC and Hong Kong in relation to environmental protection and pollution control, including but not limited to the followings:

- Environmental Protection Law of the PRC;
- Energy Conservation Law of the PRC; and
- Law of the PRC on the Prevention and Control of Environmental Pollution by Solid Waste.

No cases of material non-compliance with relevant laws and regulations that have a significant impact on the Group relating to air and greenhouse gas (“GHG”) emissions, discharges into water and land, and generation of hazardous and non-hazardous waste had been recorded during the Reporting Period.

A1. 排放

作為一間非製造業公司，本集團對環境產生的負面影響甚微。本集團於日常營運中並無產生廢氣和有害廢棄物排放。本集團產生的直接及間接環境影響主要來自以下活動：1) 消耗汽油(本集團擁有的車輛)及購買電力；2) 商務航空差旅；及3) 消耗紙張及用水。

本集團嚴格遵守中國及香港在環境保護及污染控制方面所執行的法律、規例及法規，包括但不限於以下各項：

- 中國環境保護法；
- 中國節約能源法；及
- 中國固體廢物污染環境防治法。

於報告期間，概無錄得有關廢氣及溫室氣體(「溫室氣體」)排放、向水及土地的排污以及產生有害及無害廢棄物且對本集團有重大影響的相關法律及法規的重大違反事件。

ENVIRONMENTAL 環境

A1. Emissions (Continued)

A1.1 Air Emissions

During the Reporting Period, passenger cars operated on gasoline were used for daily transportation. The mobile combustion generated several air emissions including nitrogen oxides (“NO_x”), sulphur oxides (“SO_x”) and respiratory suspended particles (“PM”).

Mobile fuel source

汽車燃料來源

A1. 排放(續)

A1.1 廢氣排放

於報告期間，使用汽油的私家車乃用於日常交通。移動燃燒會產生若干廢氣排放物，包括氮氧化物(「氮氧化物」)、硫氧化物(「硫氧化物」)及可吸入懸浮粒子(「懸浮粒子」)。

Air emissions (non-GHG) from the vehicle

汽車產生的廢氣排放(非溫室氣體)

	SO _x (kg) 硫氧化物(千克)	NO _x (kg) 氮氧化物(千克)	PM (kg) 懸浮粒子(千克)
Gasoline 汽油	0.15	3.75	0.36

Note: Emission factors for calculations on environmental parameters throughout the report were referred to Appendix 27 to the Main Board Listing Rules and the referred documentation as set out by HKex, unless stated otherwise.

附註：除另有指明外，整份報告中有關環境參數計算的排放系數乃參考聯交所訂主板上市規則附錄二十七及其載列的參考文件。

A1. Emissions (Continued)

A1.2 GHG Emissions

During the Reporting Period, 159.14 tonnes of carbon dioxide equivalent (CO_{2eq}) were emitted, resulting in an intensity of 0.09 tonnes/m². The reported GHG emissions were attributed to the following activities:

- Direct (scope 1) GHG emissions: the mobile combustion of fuels for transportation;
- Energy Indirect (scope 2) GHG emissions: purchased electricity; and
- Other Indirect (scope 3) GHG emission: fresh water and sewerage treatment, business air travel and paper waste disposal at landfills.

A1. 排放(續)

A1.2 溫室氣體排放

於報告期間，本集團的排放量為159.14噸二氧化碳當量(CO_{2eq})，密度為每平方米0.09噸。所報告的溫室氣體排放乃來自以下活動：

- 直接(範圍1)溫室氣體排放：交通工具燃燒燃料；
- 能源間接(範圍2)溫室氣體排放：購買電力；及
- 其他間接(範圍3)溫室氣體排放：淡水及污水處理、商務航空差旅及於堆填區處置的廢紙。

ENVIRONMENTAL 環境

A1. Emissions (Continued)

A1.2 GHG Emissions (Continued)

Scope	Emission sources	GHG Emission (in tonnes CO _{2eq}) 溫室氣體排放量 (以噸計二氧化碳 當量)	Subtotal (in tonnes CO _{2eq}) 小計 (以噸計二氧化碳 當量)	GHG emission (in %) 溫室氣體排放量 (以%計)
範圍	排放來源			
Scope 1 Direct GHG emission 範圍 1 直接溫室氣體排放	Gasoline 汽油	28.34	28.34	18%
Scope 2 Indirect GHG emission 範圍 2 間接溫室氣體排放	Purchased electricity 購買電力	79.11	79.11	50%
Scope 3 Other Indirect GHG emission 範圍 3 其他間接溫室氣體排放	Fresh water and sewerage processing 淡水及污水處理	16.50	51.69	32%
	Business air travel 商務航空差旅	4.15		
	Paper waste disposed at landfills 於堆填區處置的廢紙	31.04		
Total GHG Emission 總溫室氣體排放量			159.14	100%

Note: The electricity consumption in Luoding office was not included due to its insignificant consumption. Emission factors for purchased electricity in Admiralty, Tsuen Wan, Beijing, and Guangzhou were obtained from Hong Kong Electric (HKE), CLP Power Hong Kong Limited (CLP), China Northern Power Grid, and China Southern Power Grid respectively.

附註：由於羅定辦公室的耗電量甚微，故其耗用的電力不包括在內。金鐘、荃灣、北京及廣州購買電力的排放系數分別取自香港電燈(港燈)、中華電力有限公司(中電)、中國北方電網及中國南方電網。

A1. Emissions (Continued)

A1.3 Hazardous Waste

The Group's business did not generate a significant amount of hazardous waste. Hence, no data on hazardous waste is presented in this report. Waste electronic and electrical equipment were collected by licensed handlers for proper recycling or treatment before disposal.

A1.4 Non-hazardous Waste

Non-hazardous waste generated by the Group's business operation during the Reporting Period included waste office paper and general office waste. A total of 2.26 tonnes of waste office paper and 2.08 tonnes of general office waste were generated during the Reporting Period. The waste intensity was 2.52 kg/m².

A1.5 Measures to Mitigate Emissions

The Group is aware of the emissions generated from its operations. To reduce indirect emissions generated from business air travel, the Group encourages online communications, such as Tencent meeting, WeChat and conference call, with its business partners and colleagues between the offices from different regions.

A1. 排放(續)

A1.3 有害廢棄物

本集團的業務並無產生大量有害廢棄物，因此本報告並無提供有害廢棄物的數據。廢棄電子及電氣設備由持牌處理商收集，以便於處置前作妥善回收或處理。

A1.4 無害廢棄物

於報告期間，本集團業務營運產生的無害廢棄物包括辦公室廢紙及一般辦公室廢棄物。於報告期間，本集團產生合共2.26噸辦公室廢紙及2.08噸一般辦公室廢棄物。廢棄物密度為每平方米2.52公斤。

A1.5 減排措施

本集團注意到其營運產生的排放量。為減少商務航空差旅所產生的間接排放，本集團鼓勵以騰訊會議、微信及電話會議等線上方式與業務夥伴及不同地區辦公室的同事進行溝通。

ENVIRONMENTAL 環境

A1. Emissions (Continued)

A1.5 Measures to Mitigate Emissions (Continued)

When business travel is needed, employees shall submit an application to the senior management and CEO for review and approval. Except for special and essential conditions, employees and management are only allowed to travel in economy class. The Group keeps tracks of employees' business travels and their relative carbon emission for analysis and improvement.

The Group conducts regular inspection and maintenance of vehicles to reduce air and carbon emissions. Furthermore, the Group encourages employees to take public transportation when commuting to work.

A1.6 Wastes Handling and Reduction Initiatives

When disposing of hazardous electronic wastes, the Group follows the national and local laws and regulations, such as the Law of the PRC on the Prevention and Control of Environmental Pollution by Solid Waste.

The Group supports and promotes Green Office initiatives. Envelopes, kraft envelopes and files are reused. Office supplies such as staplers and hole puncher are shared among employees in the office. Paper cups are also replaced by glass cups. The Group provides recycling bins with clear instructions and encourages recycling. During the Chinese New Year, the Group encourages employees to reuse red envelopes.

A1. 排放(續)

A1.5 減排措施(續)

當需要進行商務差旅時，僱員須向高級管理層及行政總裁提交申請以供審核及批准。除特殊及必要情況外，僱員及管理層差旅僅可乘坐經濟艙。本集團會記錄僱員的商務差旅及其相關碳排放以作分析及改進。

本集團定期進行車輛檢查及維修以減少廢氣及碳排放。此外，本集團鼓勵僱員乘搭公共交通工具上下班。

A1.6 廢棄物處理及減廢措施

處理有害電子廢棄物時，本集團遵循國家及本地法律及法規，例如中國固體廢物污染環境防治法。

本集團支持及推行綠色辦公室措施，如重用信封、公文袋及文件夾；員工於辦公室內共用釘書機及打孔機等辦公用具；以玻璃杯代替紙杯。本集團設置多個回收箱，並附上清晰指示，鼓勵回收。於農曆新年，本集團亦鼓勵僱員重用紅封包。

A1. Emissions (Continued)

A1.6 Wastes Handling and Reduction Initiatives (Continued)

Obsolete stock (such as old comic books, unsold and recalled books) are stored in the Group's warehouse. After a certain period of time, the obsolete stock in inventory will be collected by licensed recyclers.

Paper Use Efficiency Initiatives

Creating a paperless working environment not only reduces environmental damage but also fits commercial goals, as it helps save space, facilitate information sharing via IT networks, and reduce complicated documentation procedures.

The Group encourages the use of electronic documents for internal and external communication. Most office documents are digitalized to save space and reduce paper use. The Group strongly recommends shareholders to access its corporate communications, including financial reports and other business documents, through the HKex's or its website, instead of printed versions. By introducing electronic means of corporate communications to shareholders, the quantity of printed materials has been considerably reduced. This paperless practise helps protect the environment, as well as save cost on printing and administration, etc.

The Group suggests its employees to use the "print preview" function to check the layout of documents and adjust margins and font size of documents before printing to optimize the use of paper. The Group also encourages duplex printing and copying, while single-side printed paper is collected and reused in offices. Paper recycling bins are set to collect used paper, old newspapers and magazines.

A1. 排放(續)

A1.6 廢棄物處理及減廢措施(續)

陳舊存貨(例如往期漫畫書、未售出及回收書籍)均存放於本集團的倉庫。於存放一段時間後,有關陳舊存貨會經由持牌回收商收集。

用紙效益措施

建立無紙工作環境有助節省空間、促進透過資訊科技網絡的資訊分享及減少繁複的文書程序,不僅減低環境損害,更符合商業目的。

本集團鼓勵使用電子文件作內部及外部溝通。大部分辦公室文件均已數碼化,從而節省空間及用紙。本集團強烈建議股東透過聯交所或其網站查閱財務報告及其他商業文件等企業通訊,以取代印刷本。本集團向股東介紹企業通訊電子版本後,印刷量已大幅減少。此項無紙措施有助保護環境,同時節省印刷及行政等成本。

本集團建議僱員在印刷前使用「印刷預覽」功能檢查文件版面配置及調整文件邊界與字型大小,務求紙盡其用。本集團亦鼓勵雙面印刷及複印,並於辦公室收集單面打印紙張作重用,同時設置廢紙回收箱收集廢紙、舊報紙及雜誌。

ENVIRONMENTAL 環境

A2. Use of Resources

The Group upholds and promotes the principle of effective use of resources. To meet the Group's environmental commitments, various efficiency initiatives have been implemented to minimize energy use and water consumption.

A2.1 Energy Consumption

During the Reporting period, purchased electricity and gasoline were consumed for office and warehouse operations, and transportation respectively. A total of 115,432 kWh electricity consumption was recorded. The consumption of gasoline was 10,513 Litres. The total energy consumption was calculated to be 208,594 kWh, resulting in energy intensity of 121 kWh/m² during the Reporting Period.

Energy Consumption Sources 能源消耗來源	Consumption (in individual unit) 消耗量 (按自有單位)	Consumption (in kWh) 消耗量 (千瓦時)
Purchased Electricity 購買電力	115,432 kWh 115,432 千瓦時	115,432
Gasoline 汽油	10,513 Litres 10,513 升	93,162
Total 總計		208,594

Note: Conversion factors were referred to the IEA Energy Statistics Manual and 2006 IPCC Guidelines for National Greenhouse Gas Inventories.

A2. 資源使用

本集團奉行及推行有效使用資源的原則。為履行本集團對環境的承諾，本集團已實行多項效益措施以減少能源使用及耗水量。

A2.1 能源耗量

於報告期間，購買電力及汽油分別用於辦公室及倉庫運作以及交通，總計錄得115,432千瓦時電力消耗量。汽油消耗量為10,513升。於報告期間，能源總耗量經計算為208,594千瓦時，能源密度為每平方米121千瓦時。

附註：換算系數乃參考國際能源署能源統計手冊及2006年IPCC國家溫室氣體清單指南。

A2. Use of Resources (Continued)

A2.2 Water Consumption

The water consumption in the Guangzhou office and the Beijing office was totally 27,500 m³, resulting in an intensity of 38 m³/m². The consumption in other offices was centrally managed by the property management offices of premises, and the Group did not have control over the water consumption or any relevant water saving initiatives.

A2.3 Energy Use Efficiency Initiatives

The Group has been actively establishing and promoting energy-saving initiatives in the offices and warehouse. Employees at offices are advised to set the air conditioning at temperatures between 24°C to 26°C for energy-saving purposes. For unoccupied rooms, air conditioning must be switched off. When the offices are partly occupied, non-essential lighting is switched off. Employees shall turn off office lights, air conditioners, printers and computers before leaving. The Group purchased refrigerators with the highest energy efficiency (Level 1 on Energy Label). Drinking water dispensers are set with timers for auto shutdown of heating after office hours. In the Hong Kong offices, water dispensers are certified by the Hong Kong Electrical and Mechanical Services Department ("EMSD") for their electricity consumption rating.

The Group also encourages its employees to follow the dress code of smart casual on weekdays, and casual wear is allowed on Friday, reducing energy consumption for air conditioning.

A2. 資源使用(續)

A2.2 耗水量

廣州辦公室及北京辦公室的耗水量合共27,500立方米，密度為每平方米38立方米。其他辦公室的耗水量由物業管理處統一管理，故本集團不能控制耗水量或任何相關節水措施。

A2.3 節約能源措施

本集團一直積極建立及推廣辦公室及倉庫節能計劃，如建議辦公室僱員將空調設置於攝氏24度至攝氏26度範圍之內，以達致節能目的；閒置房間必須關閉空調；當局部使用辦公室時，關上不必要的照明；僱員離開辦公室前須關閉辦公室電燈、空調、打印機及電腦；本集團購買能源效益最高（一級能源標籤）的雪櫃；飲水機配有計時器，可於辦公時間後自動關閉加熱功能；香港辦公室的飲水機均通過香港機電工程署（「機電工程署」）的電力消耗評級。

本集團亦鼓勵僱員於平日遵從半正式便服的服裝要求，而於星期五則可穿著休閒裝，從而減低空調的能源耗量。

ENVIRONMENTAL 環境

A2. Use of Resources (Continued)

A2.4 Water Use Efficiency Initiatives

The Group's business does not involve heavy use of water, and thus no formal policy has been implemented. When applicable, water is recycled for watering indoor plants.

A2.5 Packaging Materials

Printed books are one of the main products of the Group. Plastic covers are used for book packaging in outsourced printer factories. The Group encourages the factories to properly plan the use of raw materials and packaging materials, like degradable plastic materials, to enhance the economic and environmental benefits to the greatest extent. Due to the insignificant amount of plastic cover consumption, data was not quantitatively recorded.

A3. The Environment and Natural Resources

A3.1 Significant Impacts of Activities on the Environment

The Group's operations did not cause any significant adverse impacts on the environment and natural resources. The Group continuously monitors its air emission, wastewater discharge, and noise level to ensure minimal impacts on the surrounding environment and creation of a healthy environment for its workers. The Group did not receive any complaints from the surrounding communities regarding air pollution, odor, noise, or night light pollution.

A2. 資源使用(續)

A2.4 節約用水措施

本集團的業務並不涉及大量用水，故並無實行正式政策。倘適用，本集團會使用循環再用水灌溉室內植物。

A2.5 包裝材料

印刷書為本集團主要產品之一。我們透過外包印刷廠使用塑膠套包裝書籍。本集團鼓勵廠商妥善規劃原材料及包裝材料(如可分解塑膠物料)的使用，以盡最大程度提高經濟及環保效益。由於塑膠套使用量甚少，故並無記錄量化數據。

A3. 環境及天然資源

A3.1 業務活動對環境的重大影響

本集團的業務並無對環境及天然資源造成任何重大不利影響。本集團持續監控其廢氣排放、廢水排放及噪音水平，以確保對周邊環境的影響降至最低，並為僱員營造健康環境。本集團並無接獲周邊社區對空氣污染、氣味、噪音或夜間光污染的任何投訴。

1. Employment and Labour Practices

B1. Employment

The Group stringently complies with the national and local laws and regulations concerning employment and labour practices, including but not limited to the followings:

- The Employment Ordinance of Hong Kong;
- The Sex Discrimination Ordinance of Hong Kong;
- The Disability Discrimination Ordinance of Hong Kong;
- The Race Discrimination Ordinance of Hong Kong;
- Labour Law of the PRC;
- Labour Contract Law of the PRC;
- Law of the PRC on the Protection of Rights and Interests of Women;
- Law of the PRC on the Protection of Minors;
- Law of the PRC on the Protection of Disabled Persons; and
- Social insurance Law of the PRC.

No non-compliance with relevant laws and regulations that have a significant impact on the Group relating to compensation and dismissal, recruitment and promotion, working hours, rest periods, equal opportunity, diversity, anti-discrimination, and other benefits and welfare had been identified during the Reporting Period.

1. 僱傭及勞工常規

B1. 僱傭

本集團嚴格遵守有關僱傭及勞工常規的國家及本地法律及法規，包括但不限於以下各項：

- 香港僱傭條例；
- 香港性別歧視條例；
- 香港殘疾歧視條例；
- 香港種族歧視條例；
- 中國勞動法；
- 中國勞動合同法；
- 中國婦女權益保障法；
- 中國未成年人保護法；
- 中國殘疾人保障法；及
- 中國社會保險法。

於報告期間，並無發現違反有關補償及解僱、招聘及晉升、工時、假期、平等機會、多元化、反歧視以及其他福利且對本集團有重大影響的相關法律法規。

1. Employment and Labour Practices (Continued)

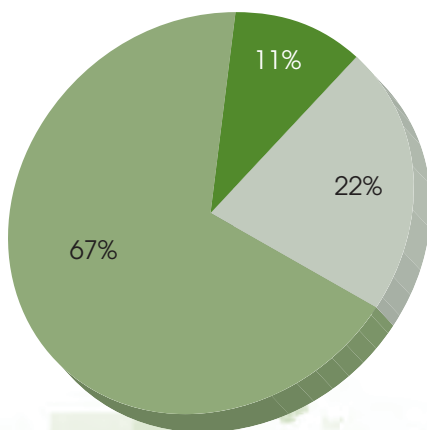
B1. Employment (Continued)

The Employee's Handbook continues to serve as the guideline and working procedure to manage employment and labour-related practices. During the Reporting Period, 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.

Workforce

At the end of the Reporting Period, the Group had a total of 177, all of which are full-time employees. The figures below present the workforce distribution by different categories.

Workforce by Category (%)
按類別劃分的僱員人數(百分比)



■ Senior management
高級管理層
 ■ Middle management
中級管理層
■ Frontline and other staff
前線及其他員工

1. 僱傭及勞工常規(續)

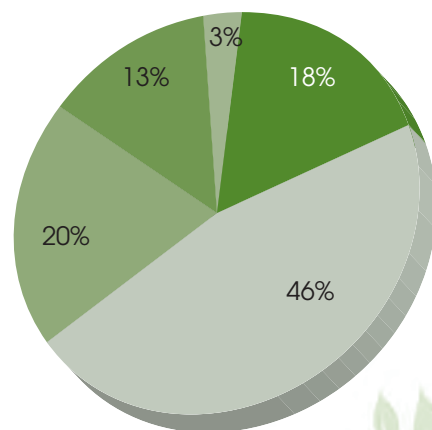
B1. 僱傭(續)

員工手冊繼續作為管理僱傭及與勞工相關常規的指引及工作流程。於報告期間，概無就有關補償及解僱、招聘及晉升、工時、假期、平等機會、多元化以及反歧視政策作重大變更。

僱員

於報告期間末，本集團合共聘有177名僱員，全部均為全職僱員。下圖數字列示現時按不同類別劃分的僱員分佈。

Workforce by Age (%)
按年齡劃分的僱員人數(百分比)



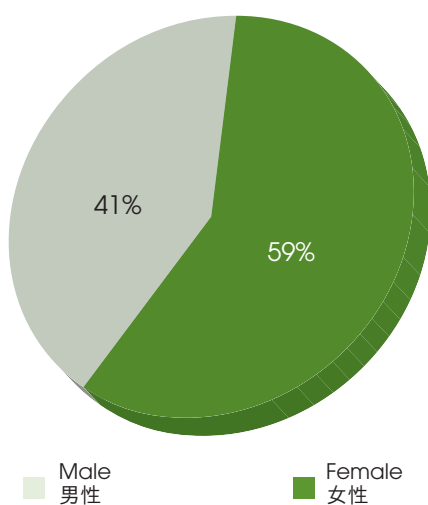
By Age Group
按年齡組別劃分
■ 18 - 25
■ 26 - 35
■ 36 - 45
■ 46 - 55
■ 56 or above 或以上

1. Employment and Labour Practices
(Continued)

B1. Employment (Continued)

Workforce (Continued)

Workforce by Gender (%)
按性別劃分的僱員人數(百分比)

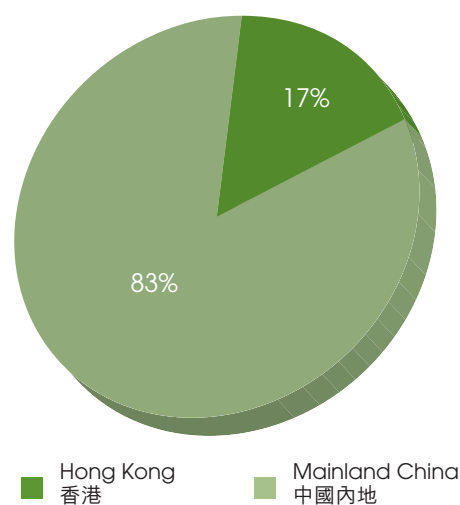


1. 僱傭及勞工常規(續)

B1. 僱傭(續)

僱員(續)

Workforce by Geographic Region (%)
按地區劃分的僱員人數(百分比)



1. Employment and Labour Practices (Continued)

B1. Employment (Continued)

Turnover

The total turnover rate during the reporting year was 10.7%.

Compensation, Allowance, and Benefits

Apart from stringently following applicable laws and regulations, the Group strives to adopt the best industrial practices by providing various benefits to employees. For examples, all employees are covered under the Group's medical scheme. Labour insurance is also provided to employees upon completion of probation, and employees are subject to personal accident insurances. Other benefits include dental scheme, retirement benefit, staff discount, welfare fund, and long service award.

The Group offers various compensation and allowance including overtime compensation, annual bonus, housing allowance, meal allowance, travel allowance, and standby allowance. Welfare Fund supports departments to organize recreational, social and other celebratory activities to enrich employees' leisure life and to enhance their team spirit.

1. 僱傭及勞工常規(續)

B1. 僱傭(續)

流失率

於報告年度，總流失率為10.7%。

補償、津貼及待遇

除嚴格遵守適用法律及法規外，本集團致力採納最佳行業慣例，為僱員提供各種福利。例如，全體僱員均受本集團醫療計劃保障。僱員於試用期結束後亦可獲提供勞工保險，及可享個人意外保險保障。其他待遇包括牙科計劃、退休福利、員工折扣、福利基金及長期服務獎勵。

本集團提供各種補償及津貼，包括超時工作補貼、年度花紅、房屋津貼、膳食津貼、差旅津貼及候命津貼。福利基金支援部門舉辦康樂、社交及其他慶祝活動，從而豐富僱員休閒生活及增強團隊精神。

1. Employment and Labour Practices (Continued)

B1. Employment (Continued)

Recruitment and Dismissal

The recruitment procedure is guided by relevant laws and regulations such as the Labour Law of the PRC and the Employment Ordinance of Hong Kong. Policies on employment have been stated clearly on the Employee's Handbook. Recruitment of new employees is based on objective criteria including professional qualifications and skill sets needed for the positions.

Termination of employment contract shall be made in writing by either party. An employee may be summarily dismissed without advance notice or payment in lieu of notice if the employee in relation to his/her employment, 1) willfully disobeys a lawful and reasonable order; or 2) misconducts himself/herself; or 3) is guilty of fraud or dishonesty; or 4) habitually neglects his/her duties; or 5) on any other grounds on which the Group would be entitled to terminate the contract of employment.

Evaluation and Appraisal System

Performance appraisal is conducted annually. Employees are promoted based on their performance and the extent to which they demonstrate the ability required in a higher grade.

1. 僱傭及勞工常規(續)

B1. 僱傭(續)

招聘及解僱

招聘程序以相關法律及法規作指引，例如中國勞動法和香港僱傭條例。僱傭政策清晰列明於員工手冊內。本集團根據客觀標準招聘新僱員，當中包括職位所需的專業資格及技能組合。

終止僱傭合約應由任何一方以書面形式提出。倘僱員在與其僱傭有關的事宜上 1) 故意違反合法合理的命令；或 2) 行為失當；或 3) 犯有欺詐或不誠實行為；或 4) 慣常疏忽職責；或 5) 本集團因任何其他理由而有權終止合約，僱員可於並無事先通知或獲代通知金的情況下即時被解僱。

評估及評核系統

本集團每年進行表現評估。僱員的晉升乃基於彼等的表現及彼等可展示更高職級所需能力的程度。

1. Employment and Labour Practices (Continued)

B1. Employment (Continued)

Equal Opportunity

The Group has established the Policy on Equal Employment Opportunities. Equal opportunities are offered to candidates and employees during recruitment, internal transfer and promotion, on the grounds of equality on gender, nationality, marital status, disability and religious belief. Any employee is entitled to the same benefits and equal treatment.

1. 僱傭及勞工常規(續)

B1. 僱傭(續)

平等機會

本集團已制定平等僱傭機會政策。不論候選人及僱員的性別、國籍、婚姻狀況、殘疾及宗教信仰，彼等在聘用、內部調任及晉升過程均享有平等機會。任何僱員均有權享有相同福利及同等待遇。

1. Employment and Labour Practices (Continued)

B2. Employee Health and Safety

Workplace safety is of the Group's high priority. The Group strictly complies with all applicable laws and regulations in relation to occupational health and safety ("OHS"), including but not limited to the Law of the PRC on the Prevention and Control of Occupational Diseases, the Occupational Safety & Health Ordinance of Hong Kong, and Employees' Compensation Ordinance of Hong Kong. The internal Health & Safety Policy guides the daily OHS management, including workplace safety, fire safety, adverse weather arrangement, etc.

During the Reporting Period, the Group updated the Safety and Health Handbook, in which a guideline for working in office during the outbreak of COVID-19 is included. Measures include stopping unnecessary business travel and visit, maintaining good ventilation, checking body temperature, and wearing masks, etc.

1. 僱傭及勞工常規(續)

B2. 僱員的健康與安全

工作場所安全對本集團至為重要。本集團嚴格遵守有關職業健康與安全(「職安健」)的所有適用法律及法規，包括但不限於中國職業病防治法、香港職業安全及健康條例以及香港僱員補償條例。內部健康與安全政策為日常職安健管理提供指引，包括工作場所安全、消防安全及惡劣天氣安排等。

於報告期間，本集團已更新安全與健康手冊，當中載有於2019冠狀病毒病爆發期間在辦公室工作的指引。有關措施包括停止不必要商務差旅及探訪、保持空氣流通、體溫檢查及配戴口罩等。

1. Employment and Labour Practices (Continued)

B2. Employee Health and Safety (Continued)

The Safety and Health Handbook also states policies and rules for occupational safety and health in the offices, management of passageways, electrical appliance and dangerous materials, and measures for emergency. The management of the Group must ensure all employees are familiar with and observe all the safety rules to guarantee the work safety of employees. Each employee should observe the importance of work safety to protect themselves from unnecessary accidents and injuries.

Ergonomic office furniture has been provided to employees for maximum comfort and fatigue reduction, reducing the risks of suffering from Musculoskeletal Disorders while performing their duties.

No work-related fatality or injury cases had been reported during the Reporting Period. No non-compliance with relevant laws and regulations that have a significant impact on the Group relating to providing a safe working environment and protecting employees from occupational hazards had been identified during the Reporting Period.

1. 僱傭及勞工常規(續)

B2. 僱員的健康與安全(續)

安全與健康手冊亦載列有關辦公室職業安全與健康、對安全通道、電器用品及危險物料的管理以及緊急措施的政策及規則。本集團管理層必須確保全體僱員熟知並遵守所有安全規則，以保障僱員的工作安全。每名僱員必須注意工作安全的重要性，以保障自身免受不必要事故及傷害。

我們向僱員提供符合人體工學的辦公傢俱，以為彼等帶來最大程度的舒適度，同時減少工作疲勞，並減低工作時患上肌肉骨骼疾病的風險。

於報告期間，概無與工作相關的死亡或受傷報告。於報告期間，概無發現違反有關提供安全工作環境及保障僱員免受職業危害且對本集團有重大影響的相關法律及法規。

1. Employment and Labour Practices (Continued)

B3. Development and Training

The Group has established the Training & Development policy, specifying training policies, new employee orientation, education allowance and professional training. A wide range of training courses have been provided to employees of all levels. For instance, all new employees attend an orientation program within the first week of employment. The program will provide information on the followings:

- the organization structure and mission of the Group;
- the employee's role in contributing to business success and objectives;
- different departments of the Group, through a guided tour around the office;
- the collaboration between various departments; and
- office procedures.

The Group also provides its Directors and senior managements with training and updates to maintain continuing professional development and enhance their knowledge and skills. The training and updates include regular updates on rules for listed companies, training on relevant laws and regulations, corporate governance, inside information, anti-corruption and bribery, internet risk and international accounting standards as well as risk management accountability for Directors.

1. 僱傭及勞工常規(續)

B3. 發展及培訓

本集團已制定培訓及發展政策，當中訂明培訓政策、新僱員入職培訓、教育津貼及專業培訓。本集團為各級僱員提供廣泛培訓課程。例如，所有新僱員於受聘首週內均須參加入職培訓計劃。該計劃將提供以下資料：

- 本集團的組織架構及使命；
- 僱員於促進業務成功及目標方面的角色；
- 透過辦公室導覽參觀本集團不同部門；
- 各部門之間的合作；及
- 辦公室程序。

本集團亦向其董事及高級管理層提供培訓及更新內容，助其保持持續專業發展並提升其知識及技能。培訓及更新內容包括上市公司規例的定期更新、有關相關法律及法規、企業管治、內幕消息、反貪污及賄賂、網絡風險及國際會計準則的培訓以及董事風險管理責任。

1. Employment and Labour Practices (Continued)

B3. Development and Training (Continued)

The Group encourages self-development of employees through attending external training programs and seminars. They are encouraged to join seminars promoted by professional firms. Topics of seminars include risk management, Internal control, money laundering and Intellectual Property (IPs) management. Permanent employees who have completed one year of service can apply for the sponsorship for external training programs relevant to their jobs. Prior approval from their department heads is required and employees are eligible for reimbursement of program fees upon their completion of the related courses with passing grades or satisfactory attendance. Employees taking examinations for acquiring professional qualifications relevant to their jobs can apply for reimbursement of the examination fees.

1. 僱傭及勞工常規(續)

B3. 發展及培訓(續)

本集團鼓勵員工透過參加外部培訓課程及研討會自我發展。本集團鼓勵員工參加由專業公司推行的研討會。研討會主題包括風險管理、內部監控、洗黑錢及知識產權管理。服務滿一年的正式僱員可就與其工作相關的外部培訓計劃申請資助，惟須事先獲其部門主管批准。倘僱員完成相關課程並考獲合格成績或出席率令人滿意，則可報銷課程費用。倘僱員為考取與工作相關的專業資格而參加考試，則可申請報銷考試費。

1. Employment and Labour Practices (Continued)

B4. Labour Standards

The Human Resources Department continues to implement comprehensive checking system during the recruitment process to ensure compliance with all the applicable laws regarding employment and labour standards, such as the Employment Ordinance of the Laws of Hong Kong and Provisions on the Prohibition of Using Child Labour of the PRC.

The Group prohibits unauthorized overtime work. The number of working hours is clearly stated on the Employee's Handbook. Employees working overtime must get prior approval from line managers and they are eligible for compensation leave.

The Group strictly forbids any forms of workplace harassment. Upon finding or encountering any suspicious actions, employees can make a complaint to the Human Resources Department. Investigate the case will be conducted thoroughly and confidentially in accordance with the guidelines in handling harassment complaints.

1. 僱傭及勞工常規(續)

B4. 勞工準則

於招聘過程中，人力資源部繼續實施全面檢查制度，以確保遵守有關僱傭及勞工準則的所有適用法律，例如香港法例項下的僱傭條例及中國禁止使用童工規定。

本集團禁止未經授權的超時工作。工作時數已於員工手冊內清晰列明。僱員超時工作須事先獲得直屬經理批准，並可獲補假。

本集團嚴禁任何形式的職場騷擾。倘發現或遇上任何可疑行為，僱員可向人力資源部投訴。有關人員將根據處理職場騷擾投訴指引徹底及保密地調查有關個案。

1. Employment and Labour Practices (Continued)

B4. Labour Standards (Continued)

The Group will take appropriate disciplinary action against anyone who is in breach of any applicable laws, regulations, and ordinance. No non-compliance with relevant laws and regulations relating to preventing child and forced labour had been identified during the Reporting Period.

1. 僱傭及勞工常規(續)

B4. 勞工準則(續)

本集團將對違反任何適用法律、法規及條例的任何人士採取適當紀律處分。於報告期間，概無發現有關防止童工及強迫勞動的相關法律及法規的違反情況。

2. Operating Practices

B5. Supply Chain Management

Supply chain management is of paramount importance when it comes to a sustainable business strategy. The Group has established a guidance on Environmental Supply Chain Management to manage suppliers. The Group conducts dialogue and collaborates with suppliers and sub-contractors on continuous improvements of the environmental performance of products and services to achieve the following missions for both sides:

- Improve business and public image;
- Reduce risk of legal non-compliance;
- Improve productivity and efficiency;
- Reduce number of defaults; and
- Improve environmental management.

2. 營運常規

B5. 供應鏈管理

供應鏈管理對可持續業務戰略至關重要。本集團已設立環境供應鏈管理指引以管理供應商。本集團與供應商及分包商就持續改善產品及服務的環境表現進行對話及合作，從而為雙方完成下列任務：

- 提升業務及公共形象；
- 減少違法風險；
- 提高生產力及效率；
- 減少違約數量；及
- 提升環境管理。

2. Operating Practices (Continued)

B5. Supply Chain Management (Continued)

To achieve the mission statements effectively, the Group provides guidance and works with its suppliers to:

- Identify sources of pollution and waste, and implement measure to prevent pollution and waste, e.g. use renewable raw materials;
- Improve the environmental performance, extending responsibility in the supply chain, e.g. avoid derivatives and contamination; and
- Use cost-efficient technologies that facilitate cleaner production, pollution prevention and eco-efficient.

Every year, the Group reviews the guidance to determine if updates are needed and review the environmental status and performance of suppliers and sub-contractors.

2. 營運常規(續)

B5. 供應鏈管理(續)

為有效達成任務，本集團提供指引並與供應商合作以：

- 識別污染及廢棄物源頭，並實施措施防止污染及廢棄物，例如使用可再生原材料；
- 改善環境表現，延伸供應鏈中的責任，例如避免產生衍生物及污染；及
- 使用可促進潔淨生產、防止污染及兼具生態效益與成本效益的技術。

本集團每年審閱相關指引以決定是否需要更新，並審閱供應商及分包商的环境狀態及表現。

2. Operating Practices (Continued)

B6. Product Responsibility

Product Labelling, Health and Safety, and Advertising

For any marketing and promotional activities, the Group ensures that relevant activities observe applicable laws and regulations such as the Advertisement Law of the PRC. No false nor misleading contents shall be contained in any advertisement. The Operation and Compliance Teams are responsible for the management of relevant activities and compliance of applicable regulations.

During the Reporting Period, the Group had not recorded any cases of material non-compliance with laws and regulations regarding health and safety, advertising, labelling and privacy matters relating to products and services provided.

Quality Assurance

The Group's Quality Assurance policy requires that comic books and products must be inspected by the Comics Department before production. A fixed number of samples, including but not limited to products, comic books and manuscripts, are kept in the Group's inventory. The Group had not received any product-related or service-related complaint during the Reporting Period.

2. 營運常規(續)

B6. 產品責任

產品標籤、健康及安全以及廣告

就任何市場營銷及推廣活動而言，本集團確保相關活動遵守適用法律及法規，例如中國廣告法。任何廣告概不得載入錯誤或具誤導性的內容。營運及合規團隊負責管理相關活動及遵守適用法規。

於報告期間內，本集團並無錄得有關涉及所提供產品及服務的健康及安全、廣告、標籤及隱私事項的法律及法規的任何重大違反事件。

品質保證

本集團的品質保證政策規定，漫畫書籍及產品於生產前須由漫畫部檢查。本集團存置固定數量的樣本，包括但不限於產品、漫畫書及手稿。本集團於報告期間並無接獲任何與產品或服務有關的投訴。

2. Operating Practices (Continued)

B6. Product Responsibility (Continued)

Intellectual Property

The Intellectual Property Policy was rigorously followed during the Reporting Period, and the Group's designated IP Team continues to work together with the Secretary and Legal Team to manage IP rights. The Group follows similar practices as the previous Reporting Periods relating to the protection of IP rights, the process of IP authorization and licensing, and any infringement case. The IP Team conducts routine monitoring and assessments and reports to various departments. Publishing materials, products and productions are only licensed upon verifications of the licensee and upon approval of formal agreements with the Group's Legal Team.

When an infringement of the Group's work is detected, the Group send a cease and desist letter to notify the alleged infringer of its activity and stop the use of the Group's works, goods and services. Legal action will be taken to stop a patent infringer from further producing or selling relevant works, goods and services.

As of March 31, 2020, over 200 comic titles had been actively listed under the Group's IPs portfolio. Various active trademarks had been registered within various regions, including Hong Kong, the PRC, and the USA. The group's domain name (culturecom.com.hk) was also kept active.

2. 營運常規(續)

B6. 產品責任(續)

知識產權

本集團於報告期間嚴格遵守知識產權政策，而本集團指定的知識產權團隊將繼續與秘書及法律團隊聯手管理知識產權。本集團就保障知識產權、知識產權許可與授權過程以及任何侵權情況採用與過往報告期間相類似的做法。知識產權團隊進行例行監察及評估，並向多個部門作出報告。出版材料、產品及製作僅於本集團的法律團隊在核證授權及正式協議批准後方獲授權。

倘發現本集團的作品遭到侵權，本集團會寄發一封停止並終止函，告知涉嫌侵權者其觸犯侵權行為及要求該人士停止使用本集團的作品、產品及服務。本集團將會採取法律行動以阻止專利侵權者進一步生產或出售相關作品、產品及服務。

截至二零二零年三月三十一日，超過200部漫畫已列入本集團的知識產權組合名下。多項商標已於多個地區(包括香港、中國及美國)註冊。本集團亦會繼續沿用域名(culturecom.com.hk)。

2. Operating Practices (Continued)

B6. Product Responsibility (Continued)

Intellectual Properties (“IPs”) (Continued)

To protect IPs of the third parties, employees are prohibited to illegally install and use any pirated computer software. The Group’s IT department is responsible for monitoring relevant matters. During the Reporting Period, no case of IPs infringement had been identified.

Data Protection

The Group understands that it has an indispensable responsibility for the protection of personal data. Data privacy of consumers, customers, and suppliers is strictly protected by the Group.

To preserve the confidentiality of customer personal data, the Group maintains the following data privacy principles:

- Only collect personal data that is believed to be relevant and required to conduct the normal course of business;
- Do not disclose any customer personal data unless the Group has expressly informed or got the consent from the customers, or it is required by law;
- Do not transfer personal data to any entity without customers’ consent unless it is required by law or it has previously notified the customer; and

2. 營運常規(續)

B6. 產品責任(續)

知識產權(「知識產權」)(續)

為保障第三方的知識產權，僱員一律禁止非法安裝及使用任何盜版電腦軟件。本集團的資訊科技部負責監察相關事宜。於報告期間，概無發現知識產權侵權事件。

資料保障

本集團深明其有絕對責任保護個人資料。消費者、客戶及供應商的資料隱私均受本集團嚴格保護。

為將客戶個人資料保密，本集團奉行以下資料私隱原則：

- 僅收集被認為對進行日常業務而言屬相關及必要的個人資料；
- 不得披露任何客戶個人資料，除非本集團明確告知客戶或經客戶同意或法律規定；
- 未經客戶同意，不得向任何實體轉移任何個人資料，除非法律規定或已事先通知客戶；及

2. Operating Practices (Continued)

B6. Product Responsibility (Continued)

Data Protection (Continued)

- Maintain robust security systems designed to prevent unauthorized access to personal data and implement various physical, electronic and management measures to safeguard and secure the personal data that the Group collected.

The Group also fully protects employees' personal data. All data supplied by the employees during and after the engagement process are kept confidential. An employee can make a written inquiry to the Group to see if the Group holds any of his/her personal data and to get the details of data captured, if any.

B7. Anti-corruption

The Group advocates strong work ethic that insists on compliance with law, integrity, honesty and professional dedication. The Group strictly observes the Criminal Law of the PRC, Anti-Unfair Competition Law of the PRC, Prevention of Bribery Ordinance, and other laws and regulations relating to commercial bribery. The Group has also established the Policy of Anti-Money Laundering and Anti-Extortion.

2. 營運常規(續)

B6. 產品責任(續)

資料保障(續)

- 維持健全的安全系統(該等系統乃為防止未經授權取得個人資料而設)並實施不同的實體、電子及管理措施以保護及保障本集團收集所得的個人資料。

本集團亦充分保護僱員的個人資料。於聘用過程中或之後由僱員提供的所有資料均會保密處理。僱員可以書面形式向本集團查詢，以查看本集團是否持有其任何個人資料並了解所掌握的資料詳情(倘有)。

B7. 反貪污

本集團提倡良好工作道德，堅守法律、誠信、忠誠及敬業精神。本集團嚴格遵守中國刑法、中國反不正當競爭法、防止賄賂條例以及其他與商業賄賂有關的法律及法規。本集團亦已制定反洗黑錢及反勒索政策。

2. Operating Practices (Continued)

B7. Anti-corruption (Continued)

The Group forbids any form of acceptance of advantages or acts of bribery. Explicit rules concerning employees' professional integrity are communicated through the Employees' Handbook, training courses as well as guidelines. The Group also hires external auditors to conduct independent audits. All these measures effectively promote and improve the implementation of the Group's regulatory system. In addition, the Group keeps the transaction records to allow swift reconstruction of individual transaction history, which provides evidence for prosecution of criminal activities including money laundering.

For any suspected cases of money laundering or extortion, employees can fill in the Suspicious Transaction Report ("STR") and submit to the management for review. The Group will seek legal advice from professional lawyers and take appropriate legal action. The case will be reported to the police, the Independent Commission Against Corruption (the "ICAC"), HKex and the Securities and Futures Commission ("SFC") if appropriate.

No non-compliance with relevant laws and regulations that have a significant impact on the Group relating to corruption, bribery, fraud and money laundering had been identified during the Reporting Period.

2. 營運常規(續)

B7. 反貪污(續)

本集團嚴禁任何形式的利益收受或賄賂行為，並透過員工手冊、培訓及指引傳達有關員工職業操守的明確規則。本集團亦已僱用外聘核數師進行獨立審計。所有此等措施均有效促進及改善本集團監管系統的實施。此外，本集團保留交易記錄，以便迅速重建獨立交易歷史，為起訴犯罪活動(包括洗黑錢)提供證據。

僱員可就任何洗黑錢或勒索可疑個案填寫可疑交易報告(「可疑交易報告」)，並提交予管理層以供審查。本集團會向專業律師尋求法律意見並採取適當法律行動。有關個案將於適當情況下向警署、廉政公署(「廉政公署」)、聯交所以及證券及期貨事務監察委員會(「證監會」)上報。

於報告期間，概無發現違反有關貪污、賄賂、欺詐及洗黑錢且對本集團有重大影響的相關法律及法規。

2. Operating Practices (Continued)

B8. Community Investment

While formal policies on community engagement are yet to be established, the Group continues to put resources in public education and strives to implement corporate social responsibility and to participate in public welfare activities.

2. 營運常規(續)

B8. 社區投資

雖然尚未訂立與社區參與有關的正式政策，本集團將繼續為公共教育投放資源並致力於履行企業社會責任及參與公共福利活動。

CULTURECOM



文化傳信集團有限公司
(於百慕達註冊成立之有限公司)
(股份代號：00343)

CULTURECOM HOLDINGS LIMITED
(Incorporated in Bermuda with limited liability)
(Stock Code : 00343)

