



捷利交易寶金融科技有限公司

TradeGo FinTech Limited

(於開曼群島註冊成立的有限公司)

股份代碼: 8017



2020

ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

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1. ABOUT THIS REPORT

TradeGo FinTech Limited (“**TradeGo**” or the “**Company**”) and its subsidiaries (the “**Group**” or “**we**”) are pleased to announce our third environmental, social and governance (“**ESG**”) report (the “**ESG Report**” or the “**Report**”). This Report explains our work and key performance indicators in environmental and social areas during the period from 1 April 2020 to 31 March 2021 (the “**Reporting Period**” or the “**Year**”), demonstrating to stakeholders our principles and concept of sustainable development and the fulfillment of corporate social responsibility.

Reporting Standard

The ESG Report is prepared in accordance with the requirements of the “Environmental, Social and Governance Reporting Guide” (the “**Guide**”) as set out in Appendix 20 to the Rules Governing the Listing of Securities on GEM of The Stock Exchange of Hong Kong Limited (the “**Hong Kong Stock Exchange**”), and is in compliance with the “general disclosures” and “Comply or Explain” provisions under the Guide, with additions of recommended disclosures. Readers may refer to the last section headed “Appendix II: THE HONG KONG STOCK EXCHANGE ESG REPORTING GUIDE INDEX” of this Report for quick reference.

Reporting Scope

Unless otherwise stated, the content of this Report covers the business directly controlled by the Group and collects data from our Shenzhen offices for assessment of environmental key performance indicators. For details of the Group’s corporate governance, please refer to the section headed “Corporate Governance Report” in the Group’s 2020 Annual Report or visit the Group’s official website (www.tradego8.com).

Reporting Language

This Report is prepared and published in both Traditional Chinese and English. In case of discrepancies, the Chinese version shall prevail.

Feedback on the Report

We value your comments on this Report. If you have any enquiries or suggestions on this Report or the Group’s sustainable development strategies, please feel free to contact us via email at master@tradego8.com.

2. ABOUT THE GROUP

The Group is one of the leading integrated securities trading platform service providers, serving primarily Hong Kong brokerage firms and their clients. As a financial service provider, we are committed to assisting customers in achieving their goals by offering convenient and quick securities trading services. The Group provides the following five categories of main services, namely (1) front office trading system services; (2) market data services; (3) hosting and cloud infrastructure services; (4) SaaS services and (5) other value-added services, via our securities trading platform software (“**TradeGo**”).

The Group continues to improve its integrated securities trading platform services to keep pace with regulatory and new industrial requirements. Our securities trading platform software supports transactions in a variety of financial instruments, including stocks, ETFs, futures, options, warrants and derivatives. Customers and end users can log onto our securities trading platform software through various channels such as major operating systems (including Microsoft Windows, MacOS, Android and iOS) as well as mainstream platforms (such as web browsers). We have developed an online account opening system that allows non-face-to-face account opening via the internet to help customers process their applications efficiently. The number of registered users of the Group was approximately 600,000 for the Reporting Period.

Our global futures trading platform system, the AiBS Trader, allows investors to trade global futures at any time via their mobile devices or personal computers, and has gained the trust of clients.

Due to the outbreak of COVID-19, more and more clients realise the necessity of transferring the service system to the cloud. In the future, we will continue to provide quality and innovative products for institutions and personal clients in the Hong Kong monetary and securities market. The Group is poised to upgrade the TradeGo system to serve more clients.

3. PHILOSOPHY OF SUSTAINABLE DEVELOPMENT

The Group is engaged in integrating sustainability into daily operations. We have established the Corporate Environment Policy (《企業環境政策》), comprising four areas, namely product and service, staff, environment and community, and maps out the approach of the corporate social responsibility efforts we deploy beyond business development. During the Year, based on the scope of the Corporate Environment Policy and our latest business development, we outlined four key focuses as the strategy of sustainable development, namely “quality services”, “people-oriented”, “green development” and “contribution to the society”.

3.1. Board Statement

TradeGo has been working on the Group’s sustainable development. We established an Environmental, Social and Governance Committee (the “**ESG Committee**”), comprising executive directors, chief operating officer and senior management of the functional department. Led by the Board, the ESG Committee draws up the Group’s strategic planning and policies on ESG, and promotes integration of sustainability into the decision-making processes and daily operations of the business unit. The Board remains solely responsible for the Group’s ESG strategy and reporting. Through materiality assessment, we understand stakeholders’ expectations, identify and prioritise material ESG issues to develop appropriate ESG approaches and strategies.

In addition, we identify and assess major ESG risks that may have an impact on us, including data security, customers' privacy protection, operation in compliance, and take various measures to manage these risks. We are also aware of climate-related risks such as the possibility of extreme weather leading to service disruptions and temporary office closures, and have set out corresponding measures to mitigate the negative impact of these risks. We have set environmental targets, covering areas of energy efficiency and greenhouse gas emissions, water use efficiency and waste reduction, and will monitor and follow up their progress so as to reduce consumption of natural resources and the environmental impact of our business operations.

During the Year, we have set out four key focuses of our sustainability strategy, which include "quality services", "people-oriented", "green development" and "contribution to the society". Apart from striving to boost the Group's sustainable development, the Board will work with our staff, business partners and other parties to promote sustainability in the communities where we operate.

3.2. ESG System

The Group has established an ESG Committee, comprising executive directors, chief operating officer and department heads of the Group, for the purpose of managing the Group's ESG related issues. The ESG Committee regularly reports to the Board on the direction and progress of ESG work, assesses ESG risks and reviews whether relevant internal control system is appropriate and effective. During the Year, the ESG Committee also assisted the Board in assessing, determining and prioritising material ESG issues pertinent to the Group as more responsibilities are expected of the Board by the Hong Kong Stock Exchange.

The major duties of the ESG Committee are as follows:

Identify the ESG matters that have a material impact on the Group and its stakeholders, including the quality of working environment, environmental protection, operational practices and community participation;

Maintain the operation of the corporate social responsibility management system and enhance the staff's corporate social responsibility awareness;

Promote each department to execute various ESG policies;

Identify and solicit stakeholders' opinions on material ESG matters through appropriate channels and respond accordingly;

Review and monitor the Group's ESG policies and practices;

Ensure that the Group complies with relevant legal and regulatory requirements, monitor and respond to the latest ESG issues;

Propose suggestions to the Board at appropriate timing, so as to improve the Group's ESG performance.

3.3. Communication With Stakeholders

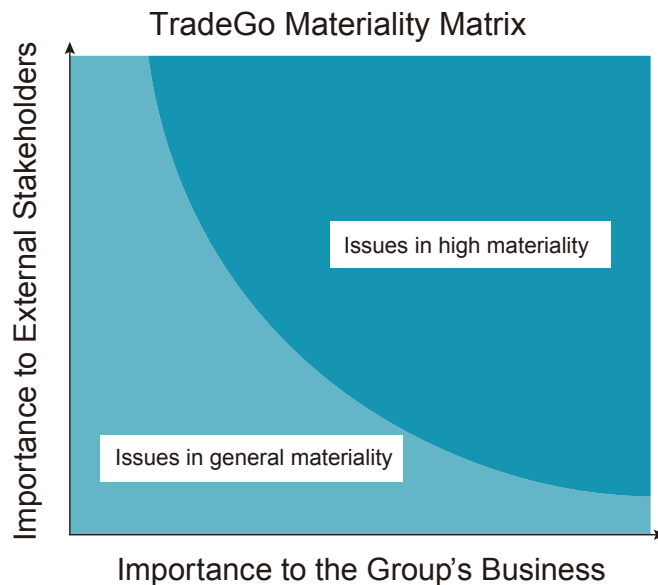
While actively developing our business, we are also sensitive to the concerns and expectations of our stakeholders. We value and collect the views of our various stakeholders (including customers, suppliers and employees), both internally and externally, through a wide range of channels. Their advice helps us to stay abreast of the market, improve our business performance, as well as identify the downside of our previous work, inspiring us to explore future opportunities for sustainable development.

Major stakeholders	Communication channels
Customers	<ul style="list-style-type: none"> • Customer satisfaction survey and feedback form • Customer service centre • Daily operation/communication • Online service platform • Telephone • Mail box
Shareholders/Investors	<ul style="list-style-type: none"> • Annual general meetings and other shareholders' meetings • Quarterly reports, interim reports and annual reports • Corporate communication, such as letters/circulars to shareholders and meeting notifications • Results announcements
Staff	<ul style="list-style-type: none"> • Staff's channels to express opinions (forms, suggestion boxes, etc.) • Work performance appraisals • Interviews • Business presentations • Special consultation committees/panels • Seminars/workshops/lectures • Staff communication conferences
Business partners/peers	<ul style="list-style-type: none"> • Meetings • Visits • Group's announcements
Regulators	<ul style="list-style-type: none"> • Written response to public enquiries • Compliance reports
Media	<ul style="list-style-type: none"> • Results announcements
Community/ Non-governmental organisations	<ul style="list-style-type: none"> • Community activities
Professional groups	<ul style="list-style-type: none"> • Meetings • Mails

3.4. Materiality Assessment

To enhance the materiality of our sustainability disclosures, we commissioned an independent consulting firm to conduct an ESG materiality assessment. Stakeholders were invited to take an online questionnaire to prioritise ESG issues by scores. Based on the result of the materiality assessment, we focus our disclosure on the issues our stakeholders care most.

Establishing a list of material issues	We established a list of material ESG issues that are most relevant to stakeholders and the Group’s business by referring to a wide range of standards and guidance, including the Guide of Hong Kong Stock Exchange, the Sustainability Accounting Standards Board (“SASB”) materiality map and industry trends.
Conducting a questionnaire on material ESG issues	We invited stakeholders, including management, directors, customers, staff and professional groups, to take an online questionnaire and rank different issues according to materiality.
Determining priorities for ESG issues	We reviewed the materiality and priority of each issue based on the two dimensions of “importance to the Group’s business” and “importance to external stakeholders”, and compiled the results of the materiality assessment.



Materiality	No.	Material issues
High	1.	Staff health and safety
	2.	Staff training and development
	3.	Prevention of child labour and forced labour
	4.	Data security
	5.	Customer's privacy protection
	6.	Business ethics
	7.	Corporate governance
	8.	Compliant operations
	9.	Compliant employment
	10.	Risk management
General	11.	Staff diversity and equal opportunity
	12.	Staff remuneration and welfare
	13.	Intellectual property rights
	14.	Customer service management
	15.	Procurement and supply chain management
	16.	Anti-corruption
	17.	Green operations
	18.	Greenhouse gas management
	19.	Response to climate change
	20.	Community charity
	21.	Relationship with investors
	22.	Anti-competitive behaviour

4. QUALITY SERVICES

We are actively expanding our business and investing heavily in innovation and research and development to improve the quality of our products and service efficiency. We are committed to providing users with convenient and quality front office trading system experience, and have put in place various risk management and internal control policies to operate our business in a pragmatic manner and in strict compliance with business ethics and compliance standards.

4.1. Anti-corruption

We adopt a zero-tolerance attitude towards any form of corruption and bribery in the value chain and strictly abide by laws and regulations such as the Supervision Law of the People's Republic of China (the "PRC" or "China") (《中華人民共和國監察法》), the Securities Law of the PRC (《中華人民共和國證券法》), the Company Law of the PRC (《中華人民共和國公司法》), the Criminal Law of the PRC (《中華人民共和國刑法》), the Regulation on the Supervision and Administration of Securities Companies of the PRC (《中華人民共和國證券公司監督管理條例》), the Regulation on the Administration of Futures Trading (《期貨交易管理條例》), the Measures for the Compliance Management of Securities Companies and Securities Investment Fund Management Companies (《證券公司和證券投資基金管理公司合規管理辦法》), the Guidelines for the Compliance Management of Securities Companies (《證券公司合規管理實施指引》), and the Anti-Money Laundering Law of the PRC (《中華人民共和國反洗錢法》).

As a financial services provider, we attach particular emphasis to financial-related compliance and provide top-to-bottom oversight of the Group's operations for compliance with governance practices and regulations. We have established an Audit Committee, comprising three independent non-executive directors, to review and monitor our financial reporting procedures and internal control systems. It regularly reviews the effectiveness of our risk management and internal control systems, makes recommendations to the Board on matters relating to corporate governance, and rectifies any issues

at an early stage. Our Compliance Department publishes an annual Risk Compliance and Internal Control Management Report (《風險合規及內控管理報告》), which provides an overview of legal compliance, the current state on risk management, business oversight and inspections, etc. During the Reporting Period, there were no significant monitoring failures and no material matters were brought to the attention of the Board. In view of the good compliance performance during the Reporting Period, we did not provide anti-corruption training to our directors and staff during the Year. We plan to invite qualified professionals from this aspect to conduct training for directors and staff in the future in order to enhance their anti-corruption awareness.

We have appointed dedicated finance staff and filing managers for the management of the Group's funds, bills and contracts. All aspects relating to the movement of funds are governed by established approval processes, including external purchases, outsourcing of services, recruitment of staff, salary adjustments, sales and expenses, etc. Staff are required to follow procedures in handling outflows of funds, and relevant applications are subject to the approval of designated departments such as administration department, compliance department, finance department, sales department and even the Chairman.

Our business is closely linked to trading in the financial markets. To avoid the risk of insider trading, the Group has an inside information disclosure policy which sets out guidelines on the reporting and dissemination of inside information, and requirements of the confidentiality and compliance with trade restrictions for staff. The Board also reviews and assesses the risk of leakage of inside information on a regular basis and will report any leakage of inside information as soon as it is discovered.

During the Reporting Period, we had not discovered any lawsuits against the Group or the employees, or any cases of corruption, bribery, extortion, fraud and money laundering.

4.2. Data Security

As a leading integrated securities trading platform service provider, we offer front office trading services and market data services to securities dealers through an integrated cloud-based service model with proprietary software. As the operation of the platform involves financial data and personal information, we pay much attention to the security of our data and network systems and have put in place various guidelines and procedures to prevent data leakage.

4.2.1. Enhancement of Cybersecurity Systems

We have established a risk management system and continuously identified and managed risks related to regulatory requirements, market trends and business developments as early as possible. The risks to the Group's data security are the cybersecurity management systems of the Group may be vulnerable to unexpected hackings or malware attacks, and the technology infrastructure may experience unexpected system failure and interruption, which could lead to operational disruptions.

In view of this, we have established a cybersecurity inspection team to assess and estimate the likelihood and means of hacking or virus attacks, and to strengthen our systems against such intrusions or attacks. We conduct cyber-attack drills to enhance the response capabilities of our technical staff in the intrusion or attack on our network systems. We set up contingency and recovery plans to ensure swift response to resume service promptly in the case of accidents. We have also set up an IT network peripheral control team to monitor the network with real-time data, so that problems can be dealt with as soon as possible to avoid disrupting the normal operation of the trading platform. The data collected are also used to analyse system vulnerabilities for improvement.

We also conduct regular system testing and evaluation to the system, and provide cybersecurity training to technical staff to enhance their ability to combat cyber attacks.

4.2.2. Customer Privacy Protection

We strictly abide by the Law of the PRC on Guarding State Secrets (《中華人民共和國保密法》) and Regulation on the Implementation of the Law of the PRC on Guarding State Secrets (《中華人民共和國保密法實施辦法》) to protect customer privacy. We have also established a number of systems to regulate the handling of personal data, such as the Password and Authority Management System (《密碼與權限管理制度》), Computer Equipment Management System (《計算器設備管理制度》) and Management System for the Safety of the Company's Server Room (《公司機房安全管理制度》). We prohibit the installation of pirated software, set permissions for data transfer, and protect information through account management and multiple passwords management. In terms of data handling, it is stipulated that staff are not allowed to disclose to any person on any data or commercial information obtained during their employment which are not made public without the prior consent of the Group. Regarding quitted personnel who have an understanding and mastery of our commercial secrets, they would be required to sign non-disclosure agreements. We also require management approval for the disposal of data storage devices. The date of disposal and related data should be recorded to ensure that the data stored in the disposed devices is completely deleted, so as to prevent leakage of customer and company information.

4.3. Intellectual Property Rights

We keep improving our trading platform software systems and continue to optimize and develop tools to enhance the efficiency of our marketing support services. Since we invest a lot of resources in Research and Development (R&D), we are committed to protecting our proprietary intellectual property rights. In case of an infringement of our intellectual property rights, we will assess its impact on our reputation and operations and consider taking legal action if necessary. Apart from protecting our own property rights, we also respect the intellectual property rights of other products and strictly complied with the laws and regulations such as the Patent Law of the PRC (《中華人民共和國專利法》), the Detailed Rules for the Implementation of the Patent Law of the PRC (《中華人民共和國專利法實施細則》), the Trademark Law of the PRC (《中華人民共和國商標法》), the Intellectual Property Law of the PRC (《中華人民共和國知識產權法》), the Patent Ordinance (《專利條例》) and Copyright Ordinance (《版權條例》) of Hong Kong. We also standardised the intellectual property management including trademark right, patents right, copyright, etc. In our daily operations, we may also refer to various data, content, images and other data involving the copyright of others, and we pay special attention to whether we have obtained the permission or authorisation from the copyright owner when using such data.

4.4. Product Quality

We place great emphasis on quality control to ensure that our customers have a smooth and convenient experience with platform services and browsing investment information. Our quality control efforts cover all aspects of our business, from the procurement of cloud servers, product development, data storage to infrastructure maintenance, with checks in place. Regarding the software development phase, we have complied with specific guidelines based on the standard of Capability Maturity Model Integration Level 3, a process level improvement training and appraisal standard administered by the CMMI Institute.

We continue to expand hardware infrastructure capabilities by purchasing test mobile phones of different models and from different manufacturers to enhance the compatibility of our software with different devices. We also conduct product testing to ensure that the service works in a variety of hardware equipment and operating systems. We also acquire and upgrade software for R&D and for office use and enhance the conversion efficiency and transition stability from physical to virtual servers.

Besides, we are developing our own services and functions to meet the needs of our customers, and in the future, we will set up an R&D centre with facilities in line with industry standard such as servers, network facilities, testers and security controls to facilitate our R&D progress and to improve the quality of our services and products.

4.5. Attentive Services

We strive to understand the needs and expectations of our customers and collect their valuable feedback through our dedicated customer service team. Feedback from customers was collected on a monthly basis. We continue to receive, respond to and follow up on customer feedback on our products and services through various customer communication channels, including customer hot-lines, emails, fax, instant messaging, internet forums and on-site interview. In case of customer requests or problems, the customer service team will work closely with the system maintenance centre and the R&D department to resolve the problems with professional knowledge.

During the Reporting Period, the Group received a total of 189 complaints from our customers, all of which have been dealt with. The number of complaints for the Year decreased significantly from 378 in 2019, as we continued to follow up on customer feedback and improve our software to enhance the quality of our products and services. The customer service rating during the Reporting Period also reached 99%.

Promoting Responsible Advertising and Marketing

The Group strictly complies with the Advertising Law of the People's Republic of China (《中華人民共和國廣告法》). We have set up a dedicated sales and marketing team to promote the trading platform software and timely launch new features of the trading platform software. We have also formulated practical sales and investment policies and guidelines to prevent customers from being misled when purchasing our products and services.

4.6. Supply Chain Management

We manage our supply chain and procurement activities to ensure the quality of our products and services. Our main suppliers include market data providers and cloud infrastructure service providers. We established evaluation criteria, including qualification, service quality, supply capacity, price, operation status and credibility, for assessment before engaging suppliers. The main responsibilities of our procurement staff include reviewing the procurement requests prepared by our R&D department as well as sales and marketing department, and further negotiating and liaising the relevant terms with the suppliers. At social level, we avoid suppliers that are involved in corruption, bribery, extortion, fraud and money laundering during supplier selection. At environmental level, we prefer green suppliers. We take environmental considerations into account during procurement, such as taking products with higher recycling efficiency, less packaging consumption, longer lifespan and higher energy efficiency into consideration. We adopt the principle of “first purchase, first use” to avoid wastage due to missed expiry dates. During the Reporting Period, among our major suppliers, 3 of them came from Mainland China and 2 of them came from Hong Kong.

5. PEOPLE-ORIENTED

The Group recognises that employees are our valuable asset and critical to the success of our business. We are committed to safeguarding the labour rights and interests of our staff by establishing a workplace of equality, inclusion, health and safety, and investing in staff training to build a professional and efficient team.

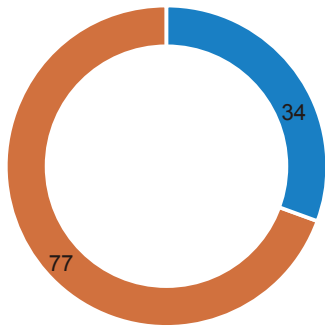
5.1. Staff Rights and Interests

The Group strictly complies with laws and regulations such as Labour Contract Law of the PRC (《中華人民共和國勞動合同法》), Labour Law of the PRC (《中華人民共和國勞動法》), Law on the Protection of Minors (《未成年人保護法》), Provisions on the Prohibition of Using Child Labour (《禁止使用童工的規定》) and Employment Ordinance (《僱傭條例》) of Hong Kong. We have compiled Staff Handbook (《員工手冊》) which stipulates that we recruit suitable staff based on their educational background, work experience and other related qualities, irrespective of factors such as gender, marital status, age, race and religion. Furthermore, we verify personal information of suitable candidates and the human resources and administration department would check their identification documents and age to prevent child labour at source. We also prevent forced labour by clearly stating the working hours of our employees in the employment letters. In case of any violation, we would handle the situations in accordance with clear stipulation in the Staff Handbook of the Group.

We are open to employees leaving the Group. An employee may terminate his or her employment by giving written notice. Then, the person in charge of the human resources department will meet the employee to understand the reasons for his or her resignation and we will review whether the resignation is management-related and make early improvements accordingly.

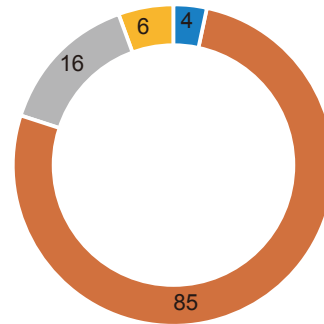
During the Reporting Period, no case of child labour or forced labour is identified in the Group. As of 31 March 2021, the Group had a total of 111 employees. The following charts show the proportions of our employees classified by gender, age group, employment type and geographical region:

Employees by Gender



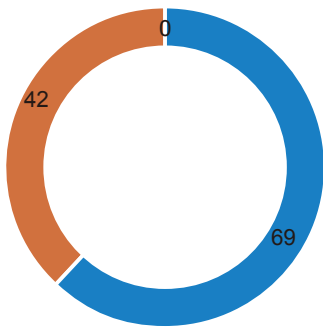
■ Female employees ■ Male employees

Employees by Employment Type



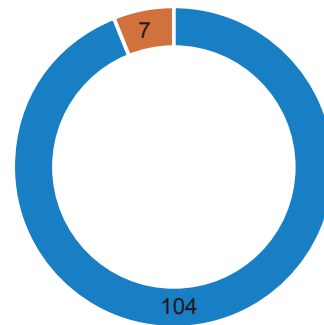
■ Short-term contract employees ■ Entry-level employees
 ■ Mid-level management employees ■ Senior management employees

Employees by Age Group



■ Employees aged below 30 ■ Employees aged 30 to 50
 ■ Employees aged above 50

Employees by Geographical Region



■ Employees from South China ■ Employees from other regions (including Hong Kong, Macau and Taiwan)

5.2. Health and Safety

Employees' health and safety is our first priority. The Group complied with the laws and regulations such as Law of the PRC on the Prevention and Control of Occupational Diseases (《中華人民共和國職業病防治法》), Production Safety Law of the PRC (《中華人民共和國安全生產法》), Provisions on the Supervision and Administration of Occupational Health at Work Sites (《工作場所職業衛生監督管理規定》), Regulation on Work-related Injury Insurances (《工傷保險條例》), as well as the Occupational Safety and Health Ordinance (《職業安全及健康條例》) of Hong Kong. Even though we operate daily business mainly in the office, a relatively safe working environment, we are committed to ensuring the safety of our staff. Thus, we have prepared a series of occupational safety and health guidance, and maintain sufficient first-aid supplies and fire protection equipment in our office for emergency uses. We also encourage our staff to actively participate in regular fire drills to enhance their emergence adaptability.

The Group also cares for employees' physical and mental health by providing sports training sessions such as yoga and gymnastics to help employees relax themselves. Over the past three years (the Reporting Period inclusive), there was no loss of working days arising from work-related deaths or injuries.

5.3. Benefit and Well-being

We value the contribution made by our employees and strive to offer them remuneration packages that are commensurate with their contributions. Remuneration packages will be reviewed regularly. The remuneration of the Group's employees is determined primarily on the basis of market rates, qualifications, competence, experience, etc. Apart from basic remuneration, the Group also grants discretionary bonuses with reference to its business performance and employees' individual performance. We conduct regular appraisals with our staff to help them set work objectives and understand their performance and room for improvement. Performance results serve as the gauge of remuneration adjustments, bonus allocation and promotion. The Group puts forward long-term award schemes, including pre-IPO equity interest incentive scheme, a share option scheme and a share award scheme, to reward and retain talents.

In terms of benefits and leave, apart from the statutory social security required by the Chinese government and statutory holidays, we also provide our staff with annual leave, funeral leave, marriage leave, maternal leave, sick leave, etc. In accordance with Chinese medical schemes, insurance is also arranged for employees upon probation to offer them healthcare protection.

5.4. Talent Training

The talents and efforts of our staff are keys to the success of the Group. We nurture talents by providing diversified learning channels to enhance the professional knowledge and skills of our staff, and keep them abreast of industry information. We also provide all staff with different kinds of training, such as compliance training from HKEX, training about the development and characteristics of the securities markets, training about history, development and corporate culture of the Company, etc., in order to boost the employees' knowledge and facilitate development for both the staff and group business. During the Reporting Period, we organise monthly training sessions on different topics, including introduction to the latest e-payment platform, Faster Payment System ("FPS"), AiPO data network application, functional updates of our products, etc. These enable our staff to understand the latest development of the Group, enrich their technical know-how and keep pace with the market.

We actively provide promotion opportunities for our talents and if vacancies arise, we would prefer internal promotions over external recruitment. In addition, we encourage communication and have set up an internal networking function to build a platform for communication between staff and the management.

6. GREEN DEVELOPMENT

The Group is fully aware of its corporate responsibility to protect the environment. The Group has complied with the relevant laws and regulations such as the Environmental Protection Law of the PRC (《中華人民共和國環境保護法》) and Energy Conservation Law of the PRC (《中華人民共和國節約能源法》). We have developed a Corporate Environmental Policy (《企業環境政策》) to encourage our employees to conserve resources in their daily work. We operate our business primarily in our offices and are not subject to specific laws and regulations related to sewage discharge, emissions and land contamination. However, we continue to monitor and manage the environmental impacts caused by our business operations and minimise them as much as possible.

During the Reporting Period, the Group had neither violated any laws in relation to environmental protection, nor contributed to any material accidents leading to negative impacts on the environment and natural resources, nor received any punishment and notice of proceedings regarding the environmental scope in relation to the Group.

6.1. Management of Carbon Emissions

China's President, Mr. Xi Jinping, has already announced carbon emission targets at the annual conference of the United Nations in September 2020, aiming to achieve the emission peak by 2030 and achieve carbon neutrality by 2060. In line with the carbon reduction targets set by the country, we monitor the sources of carbon emissions in our operations and regularly collect data for monitoring. The Group's greenhouse gas emissions (GHG) were mainly from the electricity consumption involved in office operations and we continued to conduct carbon emission calculations with reference to the Greenhouse Gas Protocol (《溫室氣體盤查議定書》) developed by World Resources Institute and World Business Council for Sustainable Development, and ISO14064-1 formulated by International Organization for Standardization.

The GHG emissions for the Group's headquarter in Shenzhen are as follows:

GHG Emission Performance		Unit	For the	For the
			year ended 31 March 2021	year ended 31 March 2020
GHG Emissions				
Scope 1	Direct GHG emissions	tonnes of carbon dioxide equivalent ("CO ₂ e")	0.0	0.0
Scope 2*	Indirect GHG emissions	tonnes of CO ₂ e	70.9	89.7
Total amount of GHG emissions		tonnes of CO ₂ e	70.9	89.7
GHG Emission Intensity				
Per square metre (Scope 1 and 2)		tonnes of CO ₂ e/m ²	0.05	0.1
Per employee (Scope 1 and 2)		tonnes of CO ₂ e/ employee	0.7	0.9

Scope 1: The direct GHG emissions generated from the sources owned and controlled by the Group.

Scope 2: The indirect GHG emissions arising from electricity generation, heating and cooling or the vapour the Group purchased externally.

* The calculation of indirect GHG emissions data during the Year has been updated, based on the emission factors of electricity issued by the National Development and Reform Commission

Except for the consumption of purchased electricity, the Group does not own or control any other equipment that emits exhaust gases, therefore the relevant emission types and emission data are not available.

6.2. Response to Climate Change

As global climate change is becoming more serious, we are aware that climate change is an issue that needs to be addressed by different sectors. The countries such as China and the European Union are formulating emission reduction roadmaps and carbon neutrality targets one after another. We believe that under these general trends, the market will have higher expectations for corporate actions against climate change and their performances. The management is fully aware of the direct and indirect impact of this risk on its operations, and in view of this, the Group has made reference to the Task Force on Climate-related Financial Disclosures (“TCFD”) to fully manage the significant climate change related risks that may affect us.

In terms of governance, the Board reviews ESG-related issues, including the issue of “Response to climate change”. In terms of strategy, we are aware of the potential impact of climate change on our operations and are therefore assessing climate change risks and opportunities to reduce our environmental impact through low carbon operations and the implementation of different green initiatives. In terms of risk management, we are considering embedding climate change-related risk elements into our existing risk management processes. In terms of metrics and targets, we are collecting data on environmental key performance indicators and disclosing the Group’s total GHG emissions and GHG emission intensity. During the Year, we have even started to set directional targets to promote the effective use of resources.

The climate change-related risks we have identified are mainly extreme weather risk, chronic physical risk, transition risk and market risk, which pose low to medium impact to our business.

Risk levels	Climate change risks	Corresponding actions
Low	<p>Extreme weather (physical risk) brings typhoons, high temperatures, heavy rains, droughts, which may lead to disruption of platform services in severe weather and may require the temporary closure of office locations</p> <p>Chronic physical risks such as sea level rise¹, possibly leading to property damage</p>	<ul style="list-style-type: none"> When the government department issues relevant extreme weather, we will implement measures to ensure the safety of employees, such as early release/working from home, depending on the situation. Regularly check and improve the stability of the platform system. Regularly review the Group’s environmental initiatives and work to ensure their effectiveness. Set carbon emission targets and reduction plans to meet the emission targets stipulated in Paris Agreement (《巴黎協議》) and contribute to climate change mitigation.
Medium	<p>Transition risks, such as the introduction of emission reduction regulations at where operations are located, which may require the Group to spend additional resources to cope with the regulations</p> <p>Market risk, such as the Group’s failure to meet consumers’ green operations expectations</p>	<ul style="list-style-type: none"> Pay close attention to regulatory developments related to the environment protection that may affect our business, supply chain and customers. Prioritise environmentally friendly investment products to support the transition towards a more inclusive, low-carbon economy.

¹ Chronic physical risks refer to risks derived from climate change over time (e.g., persistent high temperatures) that could cause sea level rise or persistent hot weather.

We are committed to implementing environmentally friendly offices to reduce GHG emissions. On the other hand, we will gradually implement measures to manage climate-related risks, in particular to improve our resilience to climate change and ensure that we can return to normal operations as soon as possible after severe weather. At the same time, we are keen to improve the stability of our trading platform to prevent instability caused by severe weather.

We will continue to regularly assess climate change related risks and the mechanisms that address such risks in the future, so as to mitigate the impact of climate change on us and make a smooth transition to a low carbon economy.

6.3. Green Office

As an integrated securities trading platform service provider, the nature of our business does not involve a significant impact on the environment or natural resources. However, we promote the efficient use of resources by our employees to improve energy efficiency and to maintain the long-term sustainability of our business and the communities in which we operate. We also convey the message on environmental protection through media such as e-mail, posters and internal network to enhance environmental awareness for our staff and facilitate the implementation of measures.

6.3.1. Energy Conservation

Most of our energy consumption derives from our uses of lighting, air-conditioning systems and equipment in our offices. In order to reduce electricity consumption and carbon emissions, we have implemented the following measures in our offices:

Air-conditioning systems	<ul style="list-style-type: none"> • Avoid installing air-conditioners where the direct sunlight is available • Clean the air filter screens/coil type fans regularly to reduce unnecessary energy consumption • Turn off air conditioning when not using the office • Allow our staff to wear casual outfits in hot weather and on Fridays
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Lighting systems	<ul style="list-style-type: none"> • Maximise the use of daylight for lighting to reduce power consumption • Adopt high-efficiency lighting • Install separate switches in meeting rooms to avoid use of lights in the unnecessary lighting zones for a long time • Keep lighting fixtures and lamps clean to maximise their energy efficiencies • Enable the staff to develop the habit of switching off lights when they are not in use
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Electronic equipment and appliances	<ul style="list-style-type: none"> • Set the computers to go into automatic standby/sleep mode when it is idle • Train employees to turn off electronic devices completely during non-working hours • Consider the energy efficiency performance when purchasing electronic equipment
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Due to the outbreak of novel coronavirus pneumonia in the previous year, the Company adopted a work from home arrangement, resulting in a significant reduction in energy consumption in the office in the previous year. During the Year, as the epidemic subsided, office work gradually resumed and therefore both the intensity of electricity consumption per square metre and electricity consumption per capita increased. The following is the energy consumption of the Group's headquarter in Shenzhen during the Reporting Period:

	Unit	For the year ended 31 March 2021	For the year ended 31 March 2020
Total electricity consumption	kWh	116,277.0	107,217.0
Electricity consumption intensity			
Per square metre	kWh/m ²	78.7	72.6
Per employee	kWh/employee	1,118.0	1,030.9

6.3.2. Paper Conservation

The Group has adopted paperless electronic office systems for daily administrative work and encourages staff to replace paper records with electronic documents and electronic communications, so as to reduce paper usage and document printing. Where document printing is unavoidable, staff is encouraged to use small fonts, narrow line spacing, and double-sided printing and reuse or double-sided scrap paper whenever possible. Printers in our office are also preset to print on both sides of the paper in an ink-saving mode to reduce ink use and paper waste. We also start with the purchase of environmentally friendly materials and try to purchase printing paper, toilet paper and paper towels that contain recycled materials.

With our efforts, paper consumption for the Reporting Period decreased by 7.7%. The following is the paper usage of the Group's headquarter in Shenzhen during the Reporting Period:

	Unit	For the year ended 31 March 2021	For the year ended 31 March 2020
Total paper consumption	kg	120.0	130.0
Paper consumption intensity			
Per employee	kg/employee	1.2	1.3

6.3.3. Water Conservation

We encourage our staff to conserve water and start with education, such as posting water conservation signage to remind them to cherish water. If any leaking faucet is found, we will contact the property management company immediately to arrange maintenance work as soon as possible to reduce unnecessary wastage.

Due to the outbreak of novel coronavirus in the previous year, the Company adopted a work from home arrangement, resulting in a significant reduction in water consumption in the office in the previous year. During the Year, as the epidemic subsided, office work gradually resumed and therefore the water consumption intensity per square metre and per capita increased. The following is the water usage of the Group's headquarter in Shenzhen during the Reporting Period:

	Unit	For the year ended 31 March 2021	For the year ended 31 March 2020
Total water consumption	m ³	960.0	900.0
Water consumption intensity			
Per square metre	m ³ /m ²	0.6	0.6
Per employee	m ³ /employee	9.2	8.7

6.3.4. Waste Reduction

The Group promotes “waste reduction at source”, “reuse” and “recycling”, and strives to reduce waste generation. We assess the usage of materials to avoid overstocking and will avoid the use of disposable and non-recyclable products. We also encourage staff to use rechargeable batteries, reuse pen holders, envelopes, document folders, file cards and other office stationeries, and recyclable toner cartridges/ink cartridges.

We placed separate waste recovery bins for collecting paper, metal, plastics and batteries. The collected paper, metal, plastics and batteries are sent to designated recycling stations for processing.

As a result of the above measures, the non-hazardous waste generation intensity per capita decreased by approximately 7.3% during the Reporting Period, compared with those during the previous year. The following is the data on waste production of the Group's headquarter in Shenzhen during the Reporting Period:

	Unit	For the year ended 31 March 2021	For the year ended 31 March 2020
Total amount of non-hazardous waste produced	kg	925.0	1,000
Total amount of hazardous waste produced	kg	7.0	5.0
Total amount of non-hazardous waste recycled	kg	48.0	55.0
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Intensity of waste produced			
Non-hazardous waste produced per employee	kg/employee	8.9	9.6
Hazardous waste produced per employee	g/employee	67.3	45.0
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6.3.5. Environmental Targets

Recognising our social responsibility to protect the environment, we set initial targets for the Year in terms of energy efficiency, water efficiency, waste reduction and GHG emissions. We will review and examine the progress of our environmental targets and initiatives, and monitor our emissions sources to identify further opportunities for energy savings and emission reductions. In the future, we will set more specific and quantifiable environmental targets to more effectively contribute to the mitigation of climate change by ensuring that resources are used appropriately.

Environmental Scope	Targets ²
Energy use efficiency and GHG emission ³	Maintain or gradually reduce electricity consumption by actively implementing the Group's electricity conservation measures
Water use efficiency	Maintain or gradually reduce water consumption by actively implementing the Group's water conservation measures
Waste reduction	Maintain or gradually reduce waste generation by actively implementing the Group's resources conservation measures

² The base year of the environmental targets is 2018. The Group mainly operates its business in the office. We will regularly monitor the consumption of resources and the emissions in the office and adjust the targets according to the actual consumption and business situation.

³ During the Year, the main source of our GHG emissions was indirect GHG emissions caused by the Group's purchased electricity, and therefore, GHG emissions could be effectively reduced by saving electricity consumption.

7. CONTRIBUTION TO THE SOCIETY

While the Group is actively developing its business, we keep supporting various community involvement in order to give back to the society. We will take the advantage of our expertise in the industry to actively collaborate with charities and participate in various community investments and charity activities in the future. We will also continue to foster a sense of social responsibility among our employees and encourage them to participate in voluntary projects and/or community activities on their own initiatives. Looking ahead, we will continue our efforts to contribute to the sustainable development of our society and economy, as well as to strengthen our close partnership with the community to achieve synergy and contribute to the society.

APPENDIX I: SUSTAINABILITY DATA STATEMENTS

The following is a summary of environmental data of the Group's headquarter in Shenzhen during the Year:

Environmental Performance	Unit	For the year ended 31 March 2021
GHG emissions		
Direct GHG emissions (Scope 1)	tonnes of CO ₂ e	0.0
Indirect GHG emissions (Scope 2) ⁴	tonnes of CO ₂ e	70.9
Total GHG emissions (Scope 1 & 2)	tonnes of CO ₂ e	70.9
GHG emission intensity (per square metre) (Scope 1 & 2)	tonnes of CO ₂ e/m ²	0.05
GHG emission intensity (per employee) (Scope 1 & 2)	tonnes of CO ₂ e/ employee	0.7
Energy consumption		
Purchased electricity consumption	kWh	116,277.0
Purchased electricity consumption intensity (per square metre)	kWh/m ²	78.7
Purchased electricity consumption intensity (per employee)	kWh/employee	1,118.0
Water consumption		
Total water consumption	m ³	960.0
Water consumption intensity (per square metre)	m ³ /m ²	0.6
Water consumption intensity (per employee)	m ³ /employee	9.2

⁴ The calculation of indirect GHG emissions data during the Year has been updated, based on the emission factors of electricity issued by the National Development and Reform Commission

Environmental Performance	Unit	For the year ended 31 March 2021
Paper consumption		
Total paper consumption	kg	120.0
Paper consumption intensity (per employee)	kg/employee	1.2
Waste		
Total non-hazardous waste produced	kg	925.0
Intensity of non-hazardous waste produced (per employee)	kg/person	8.9
Total non-hazardous waste recycled	kg	48.0
Total hazardous waste produced	kg	7.0
Intensity of hazardous waste produced (per employee)	g/person	67.3

The following is a summary of the Group's human resources data for the Year:

Social Performance⁵	Unit	For the year ended 31 March 2021
Total number of employees	Person	111
Number of employees by gender		
Female employees	Person	34
Male employees	Person	77
Number of employees by employment type		
Short-term contract employees	Person	4
Entry-level employees	Person	85
Middle-level management employees	Person	16
Senior management employees	Person	6

⁵ Disclosure of Social Key Performance Indicators includes group-wide data

Social Performance⁵	Unit	For the year ended 31 March 2021
Number of employees by age group		
Employees aged below 30	Person	69
Employees aged 30 to 50	Person	42
Number of employees by geographical region		
Employees from South China	Person	104
Employees from other regions, including Hong Kong, Macau and Taiwan	Person	7
Total employee turnover rate⁶		21.8%
Employee turnover rate by gender		
Female employees		22.7%
Male employees		21.4%
Employee turnover rate by age group		
Employees aged below 30		26.6%
Employees aged 30 to 50		12.5%
Employee turnover rate by geographical region		
Employees from South China		23.0%
Employees from other regions, including Hong Kong, Macau and Taiwan		0.0%

⁶ Turnover rate = number of employees lost ÷ (number of employees lost + number of employees at the end of the year) × 100%

Social Performance⁵	Unit	For the year ended 31 March 2021
Percentage of employees trained		100%
Average training hours completed per employee by gender		
Female employees	Hour	7.5
Male employees	Hour	7.5
Average training hours per employee by employment type		
Short-term contract employees	Hour	6
Entry-level employees	Hour	8.5
Middle-level management employees	Hour	4
Senior management employees	Hour	2

APPENDIX II: THE HONG KONG STOCK EXCHANGE ESG REPORTING GUIDE INDEX

Index Content		Related Section(s)
A. Environmental Scope		
A1 Emissions	General Disclosure	Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to air and greenhouse gas emissions, discharges into water and land, and generation of hazardous and non-hazardous waste.
	A1.1	Types of emissions and respective emissions data.
	A1.2	Direct (Scope 1) and energy indirect (Scope 2) greenhouse gas emissions and, where appropriate, intensity.
	A1.3	Total hazardous waste produced and intensity.
	A1.4	Total non-hazardous waste produced and intensity.
	A1.5	Description of the emission target(s) set and the steps taken to achieve them.
	A1.6	Description of how hazardous and non-hazardous wastes are handled, and a description of the reduction target(s) set and steps taken to achieve them.
		6. Green Development
		6.1. Management of Carbon Emissions
		Appendix I: Sustainability Data Statements
		6.3.4. Waste Reduction
		Appendix I: Sustainability Data Statements
		6.3.4. Waste Reduction
		Appendix I: Sustainability Data Statements
		6.3. Green Office
		6.3.4. Waste Reduction
		6.3.5. Environmental Targets

Index Content		Related Section(s)	
A2 Use of Resources	General Disclosure	Policies on the efficient use of resources, including energy, water and other raw materials.	6.3. Green Office
	A2.1	Direct and/or indirect energy consumption by type (e.g. electricity, gas or oil) in total and intensity.	6.1. Management of Carbon Emissions Appendix I: Sustainability Data Statements
	A2.2	Water consumption in total and intensity.	6.3.3. Water Conservation Appendix I: Sustainability Data Statements
	A2.3	Description of energy use efficiency target(s) set and steps taken to achieve them.	6.3. Green Office
	A2.4	Description of whether there is any issue in sourcing water that is fit for purpose, water efficiency target(s) set and steps taken to achieve them.	6.3.3. Water Conservation 6.3.5. Environmental Targets The Group's water comes from the municipal water supply and has no problem in obtaining suitable water sources
	A2.5	Total packaging material used for finished products and with reference to per unit produced.	Not applicable, the Group's business is not involved in packaging materials
A3 The Environment and Natural Resources	General Disclosure	Policies on minimising the issuer's significant impacts on the environment and natural resources.	6. Green Development
	A3.1	Description of the significant impacts of activities on the environment and natural resources and the actions taken to manage them.	6. Green Development
A4 Climate Change	General Disclosure	Policies on identification and mitigation of significant climate-related issues which have impacted, and those which may impact, the issuer.	6.2. Response to Climate Change
	A4.1	Description of the significant climate-related issues which have impacted, and those which may impact, the issuer, and the actions taken to manage them.	6.2. Response to Climate Change

Index Content		Related Section(s)
B. Social Scope		
B1 Employment	<p>General Disclosure</p> <p>B1.1</p> <p>B1.2</p>	<p>Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to compensation and dismissal, recruitment and promotion, working hours, rest periods, equal opportunity, diversity, anti-discrimination, and other benefits and welfare.</p> <p>Total workforce by gender, employment type, age group and geographical region.</p> <p>Employee turnover rate by gender, age group and geographical region.</p> <p>5.1. Staff Rights and Interests 5.3. Benefit and well-being</p> <p>5.1. Staff Rights and Interests Appendix I: Sustainability Data Statements</p> <p>Appendix I: Sustainability Data Statements</p>
B2 Health and Safety	<p>General Disclosure</p> <p>B2.1</p> <p>B2.2</p> <p>B2.3</p>	<p>Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer in relation to the provision of safe working environment and protecting employees from occupational hazards.</p> <p>Number and rate of work-related fatalities occurred in each of the past three years including the reporting year.</p> <p>Lost days due to work injury.</p> <p>Description of occupational health and safety measures adopted, and how they are implemented and monitored.</p> <p>5.2. Health and Safety</p> <p>5.2. Health and Safety</p> <p>5.2. Health and Safety</p>

Index Content		Related Section(s)	
B3 Development and Training	General Disclosure	Policies on improving employees' knowledge and skills for discharging duties at work. Description of training activities.	5.4. Talent Training
	B3.1	The percentage of employees trained by gender and employee category (e.g. senior management, middle management).	Appendix I: Sustainability Data Statements (the percentage of employees trained is 100% by category)
	B3.2	The average training hours completed per employee by gender and employee category.	Appendix I: Sustainability Data Statements
B4 Labour Standards	General Disclosure	Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to preventing child and forced labour.	5.1. Staff Rights and Interests
	B4.1	Description of measures to review employment practices to avoid child and forced labour.	5.1. Staff Rights and Interests
	B4.2	Description of steps taken to eliminate such practices when discovered.	5.1. Staff Rights and Interests
B5 Supply Chain Management	General Disclosure	Policies on managing environmental and social risks of the supply chain.	4.6. Supply Chain Management
	B5.1	Number of suppliers by geographical region.	4.6. Supply Chain Management
	B5.2	Description of practices relating to engaging suppliers, number of suppliers where the practices are being implemented, how they are implemented and monitored.	4.6. Supply Chain Management
	B5.3	Description of practices to identify environmental and social risks along the supply chain, and how they are implemented and monitored.	4.6. Supply Chain Management
B5.4	Description of practices to promote environmentally preferable products and services when selecting suppliers, and how they are implemented and monitored.	4.6. Supply Chain Management	

Index Content		Related Section(s)	
B6 Product responsibility	General Disclosure	Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to health and safety, advertising, labelling and privacy matters relating to products and services provided and methods of redress.	4. Quality Services
	B6.1	Percentage of total products sold or shipped subject to recalls for safety and health reasons.	Not applicable to the Group's operations
	B6.2	Number of products and service related complaints received and how they are dealt with.	4.5. Attentive Services
	B6.3	Description of practices relating to observing and protecting intellectual property rights.	4.3. Intellectual Property Rights
	B6.4	Description of quality assurance process and recall procedures.	4.4. Product Quality With respect to products recall procedures, they are not applicable to the Group's operations
B7 Anti-corruption	B6.5	Description of consumer data protection and privacy policies, how they are implemented and monitored.	4.2. Data Security
	General Disclosure	Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to bribery, extortion, fraud and money laundering.	4.1. Anti-corruption
	B7.1	Number of concluded legal cases regarding corrupt practices brought against the issuer or its employees during the reporting period and the outcomes of the cases.	4.1. Anti-corruption
	B7.2	Description of preventive measures and whistle-blowing procedures, how they are implemented and monitored.	4.1. Anti-corruption
B7.3	Description of the anti-corruption training provided to directors and staff.	4.1. Anti-corruption	

Index Content		Related Section(s)
B8 Community Investment	General Disclosure	Policies on community engagement to understand the needs of the communities where the issuer operates and to ensure its activities take into consideration the communities' interests.
	B8.1	Focus areas of contribution (e.g. education, environmental concerns, labour needs, health, culture, sport).
	B8.2	Resources contributed to the focus area.
		7. Contribution to the Society
		7. Contribution to the Society
		7. Contribution to the Society