

SHOUGANG CENTURY HOLDINGS LIMITED 首佳科技製造有限公司

股份代號 Stock Code : 103

# 2024

# ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT



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**Shougang Century Holdings Limited** ("Shougang Century"/the "Company"; together with its subsidiaries, collectively the "Group") issues its environmental, social and governance (the "ESG") report (the "ESG Report") for the year ended 31 December 2024. The report expatiates the Group's ESG management strategies and performance in 2024, especially focusing on the issues of investors and other stakeholders' concerns and how the Group has value-added in economic, environmental and social terms by pursuing sustainability development into its business.

#### **Reporting Boundary**

The Group principally engages in the manufacturing of steel cords for radial tyres, sawing wires and hose wires. The ESG information contained in the ESG Report is divided into two segments: (1) steel cord segment; and (2) head office and other operating subsidiaries' office (the "Offices"). For details of corporate profile, please refer to the "CORPORATE PROFILE" section on page 2 of the 2024 annual report of the Company.

#### **Reporting Standards and Framework**

Since 2013, the Company has established an ESG working group and set up an ESG database to collect and review relevant data so as to prepare the ESG Report. In addition, the ESG Report follows all the "comply or explain" provisions set out in the ESG Reporting Guide (the "ESG Guide") of Appendix C2 of the Rules Governing the Listing of Securities (the "Listing Rules") on The Stock Exchange of Hong Kong Limited (the "Stock Exchange") for the purpose of providing our investors and stakeholders with comprehensive and comparative non-financial information.

In addition to complying with the ESG Guide, reference has been taken from international standards or guidelines in preparation of our ESG Report. The scopes of emissions and their emission factors are defined in accordance with Hong Kong and the international reporting framework published as shown below and quoted from relevant websites:

- Respective Sustainability Reports 2024 of CLP Holdings Limited and HK Electric Investments Limited;
- The Hong Kong Environmental Protection Department's (the "EPD") Vehicle Emission Calculation model;
- The Greenhouse Gas Accounting Tool for Chinese Cities published by the World Resources Institute;
- 2023 Emission Reduction Project China Regional Grid Baseline Emission Factors published by the National Center for Climate Change Strategy and International Cooperation (the "NCSC");
- The discharge coefficient of pollutant from domestic source and the user manual published by the South China Institute of Environmental Sciences under the Ministry of Environment Protection;
- The World Resources Institute/World Business Council for Sustainable Development, as reported in "The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard" and International Organisation for Standardisation ("ISO"), as reported in ISO14064-1;
- Guidelines to Account for and Report on Greenhouse Gas Emissions and Removals for Buildings (Commercial, Residential or Institutional Purposes) in Hong Kong published by the EPD and the Electrical and Mechanical Services Department (the "EMSD");
- Emission factors from Intergovernmental Panel on Climate Change;
- Practical guidance on how to collect, calculate and report the information called for under each of the key performance indicators ("KPI(s)") as reported in "How to Prepare an ESG Report", published by the Stock Exchange; and
- Guidance on Climate Disclosures published by the Stock Exchange.

The figures of 2024 and 2023 have not been assured by the third party.

Regarding corporate governance aspect, please refer to "CORPORATE GOVERNANCE REPORT" section on pages 33 to 74 of the 2024 annual report of the Company.

#### **Reporting Principles**

The Group follows the four fundamental reporting principles set out in the ESG Guide for the preparation of this report:

**Materiality**: Material environmental and social issues were identified and prioritised based on the results of the stakeholders' engagement and materiality assessment, and are disclosed in this ESG Report.

**Quantitative**: The Group records and discloses the KPIs in quantitative terms wherever appropriate for evaluation and validation of the effectiveness of ESG policies and measures.

**Consistency**: As far as reasonably practicable, the Group applies consistent measurement methodology to achieve meaningful comparison of the ESG performance over time. Any changes in the methodologies or the KPIs used will be disclosed in the relevant sections.

**Balance**: This report discloses information in an objective manner, which aims to provide stakeholders with a balanced overview of the Group's overall ESG performance.

#### **Governance Structure**

The board of directors of the Group (the 'Board') is the highest decision-making and responsibility body for ESG matters, fully responsible for formulating and reporting the Group's ESG strategies. The Board is responsible for assessing and identifying ESG risks, as well as ensuring the effective operation of the Group's risk management and internal control systems. At the same time, the Group is committed to promoting the values of social responsibility in each and integrating them into daily operations. The Board has established an ESG working group, which is dedicated to overseeing the commitments and performance of key ESG issues and regularly reporting to the Board to ensure that ESG principles are closely aligned with the Group's development strategies.

The Group attaches great importance to the significant impact that ESG risks may have on the Company. In light of the external socio-economic macro environment and the Group's development strategies, the Group regularly conducts assessments on key ESG issues and submits them to the Board for consideration. The Board considers, reviews and recognises the ESG risks and opportunities of the Group, incorporates the management and enhancement of key issues into the core ESG work and integrates them into the overall strategy, and oversees the management and performance of the relevant issues.

The Group will continue to strengthen the mechanism for the Board's participation in ESG work and consider formulating ESG management policies covering pollutant emissions, management of energy and water consumption, carbon emissions, occupational health and safety and product quality, etc., in order to consolidate the Group's ESG work and establish a mechanism for regular review of the progress of target achievement so as to ensure that the targets are effectively realised. The Group has established a mechanism to regularly review the progress of achieving the targets to ensure their effective realisation. By achieving these targets, the Group endeavours to provide customers with better quality and safer products to enhance energy efficiency and productivity, thereby minimising environmental and social impacts, and to communicate with stakeholders where appropriate.

#### **Contact us**

The Group values stakeholders' feedback relating to this ESG Report. If there are any comments or suggestions, please share by post or email at the addresses below:

#### Postal address

Room 1215, 12/F., Honour Industrial Centre 6 Sun Yip Street, Chai Wan, Hong Kong

#### E-mail addresses

business\_link@shougangcentury.com.hk ir@shougangcentury.com.hk schl@shougangcentury.com.hk

This ESG Report can be downloaded from the websites of the Stock Exchange and the Company.

## MESSAGE FROM CHAIRMAN

#### Dear Stakeholders,

I am pleased to present our Group's ninth ESG Report on behalf of the Company. As one of the leading steel cord manufacturers with a recognised "Eastern" brand name in the Mainland, we are committed to delivering high-quality and excellent products and after-sales services, maintaining a customer-centric approach, and continuously driving quality improvement and technological innovation. The Group places great importance on its responsibilities to stakeholders, actively implements environmental protection measures, strives to minimise the environmental impact of our operations, and promotes sustainable development strategies.

Looking ahead to 2025, global environmental and social challenges remain severe. Climate change and extreme weather events have heightened the urgency of environmental protection, while the expectations for employee rights protection and sustainable development from customers continue to rise. In response to these challenges, we will continue to promote emission reduction and efficient resource utilisation, actively address employee needs, seize opportunities, face challenges, and persistently pursue excellence in development.

We are committed to creating a diverse and inclusive work environment that respects employees' rights and supports their long-term development. As a responsible corporate citizen, we leverage our strengths to promote local industry development and actively participate in charitable activities to give back to society. Employees are the Group's most valuable assets, and their expertise and talents are the foundation of our sustained growth. Therefore, we strive to provide a safe and healthy workplace, enhance employee welfare and development opportunities, and attract and retain outstanding talents.

In terms of product quality, we strictly control the quality standards of the "Eastern" brand to ensure product safety and high quality, meeting customer needs. We actively optimise processes during production to reduce energy consumption and wastes, improve operational efficiency, and ensure compliance with environmental and safety standards. In supply chain management, we select partners who prioritise environmental protection and labor rights, maintaining stable cooperation to ensure the stability of production and supply.

## MESSAGE FROM CHAIRMAN

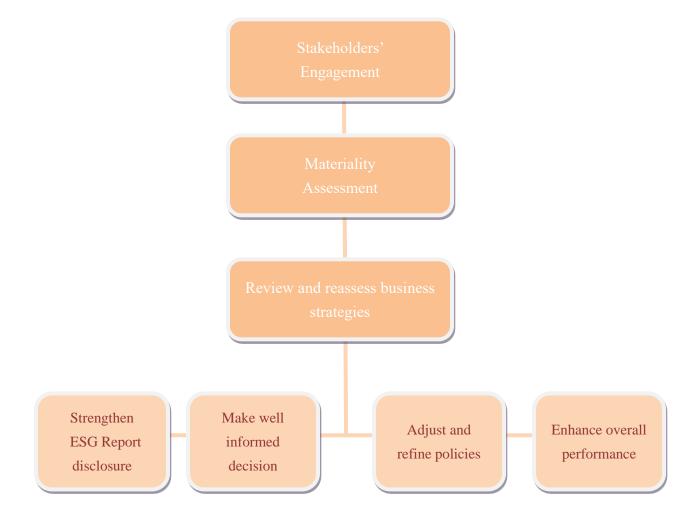
In addition, we will continuously improve our ESG framework, strengthen risk management and internal controls, and enhance the transparency and credibility of information disclosure to ensure that the sustainable development of the company aligns with social responsibility.

At last, on behalf of the Board, I would like to express my sincere gratitude to all board members and colleagues for their support and contributions to the ESG Report. I firmly believe that through our collective efforts, the Group will seize opportunities and continue to achieve greater accomplishments in environmental protection, social responsibility, and good governance. Together with our partners, we will strive towards a brighter future and create long-term value for our shareholders, employees, and society.

By Order of the Board

Su Fanrong Chairman Hong Kong, 31 March 2025

We believe that considering the interests of stakeholders is essential to our Group's commitment to sustainable development. Meeting the expectations and concerns of stakeholders is a primary responsibility alongside our goal of achieving improved financial performance. We are dedicated to thoroughly reviewing our business decisions and refining our policies and strategies to enhance both our financial and non-financial outcomes. Through a materiality assessment, we aim to better address stakeholder needs. This approach will strengthen our ESG report disclosures, enable us to implement appropriate policies, support informed decision-making, and enhance our overall performance.





#### **STAKEHOLDERS' ENGAGEMENT**

We identify our stakeholders based on the evaluation of individuals or entities that have a significant interest or concern in the Group's core activities, as well as those whose actions are likely to substantially impact our financial, operational, community investment, and environmental policies. The Group's stakeholders include shareholders, employees, customers, suppliers, media, the community and general public, government and regulators, as well as banks and financial institutions/creditors. In order to map out our relationship with stakeholders and their ability to influence our decision-making process, the "Stakeholders' Influence – Dependency Matrix" below generates insights on the importance and influence of each category of stakeholders. With this information, it becomes possible to develop a specific approach for the identified stakeholders and their concerns:

Stakeholders' dependence on Company's objective, project and business line	High dependence	Community & General Public		Banks & Financial	Shareholders Employees Customers Suppliers Government & Regulators
	No direct impacts		Media	Institutions/ Creditors	
		No influence	Low influence	Some influence	High influence

The Group acknowledges the significance of engaging with its stakeholders and views their feedback as vital to its sustainable development. To effectively understand and address stakeholders' primary concerns, we have implemented a range of engagement channels within our business processes to facilitate continuous communication. The table below summarises the Group's key stakeholders, the communication methods employed, and their expectations and concerns regarding the Group.

Stakeholders	Communication Channels	Expectations and Concerns
Shareholders	- Regular reports and	- Return on the investment
	announcements	<ul> <li>Stock price performance</li> </ul>
	<ul> <li>Annual general meeting and</li> </ul>	- Information disclosure and
	general meetings	transparency
	<ul> <li>Company website</li> </ul>	<ul> <li>Company's growth and</li> </ul>
	<ul> <li>Press releases</li> </ul>	sustainability
	- E-mail and postal correspondences	- Protection of interests and fair
	<ul> <li>Telephone enquiries</li> </ul>	treatment of shareholders
Employees	- Employees' satisfaction survey	<ul> <li>Salary competitiveness</li> </ul>
	– Trainings	<ul> <li>Working environment</li> </ul>
	- Regular performance review	- Occupational health and safety
	<ul> <li>Team building activities</li> </ul>	<ul> <li>Job security and satisfaction</li> </ul>
	- Department heads communicating	- Career advancement and trainings
	with their subordinates	<ul> <li>Management system</li> </ul>
	- Congress of Workers and Staff	
Customers	- Customers' satisfaction survey	- Supply chain management
	- Regular face-to-face meetings and	<ul> <li>Product safety</li> </ul>
	visits	<ul> <li>Compliance with laws and</li> </ul>
	<ul> <li>Scoring system for rating our</li> </ul>	regulations
	services and products	<ul> <li>Quality assurance process</li> </ul>
	- Feedbacks on product quality and	<ul> <li>Product specification requirements</li> </ul>
	service from time to time	- Credibility
		<ul> <li>Pre-sale and after-sale services</li> </ul>
		<ul> <li>Sustainable development</li> </ul>

Stakeholders	Communication Channels	Expectations and Concerns
Suppliers	<ul> <li>Regular face-to-face meetings and visits</li> <li>Scoring system for assessing the quality of products provided by suppliers</li> </ul>	<ul> <li>Profitability</li> <li>Compliance with laws and regulations</li> <li>Supply chain management</li> <li>Accountability, credibility and reliability</li> <li>Good communications</li> </ul>
Government & Regulators	<ul> <li>Occasional face-to-face meetings and visits</li> </ul>	<ul> <li>Compliance with laws and regulations</li> <li>Compliance with accounting standards and procedures</li> <li>Operational and ethnical practices</li> <li>Community investment</li> </ul>
Banks & Financial Institutions/ Creditors	<ul> <li>Occasional face-to-face meetings and visits</li> </ul>	<ul> <li>Profitability</li> <li>Financial management</li> <li>Ability to repay loans and interests</li> <li>Compliance with law and regulations</li> <li>Credibility</li> <li>Financial position</li> <li>Stock price performance</li> </ul>

To enhance the Group's overall ESG performance, we will promptly address the concerns raised by all stakeholder groups and ensure the establishment of reliable and efficient communication channels.

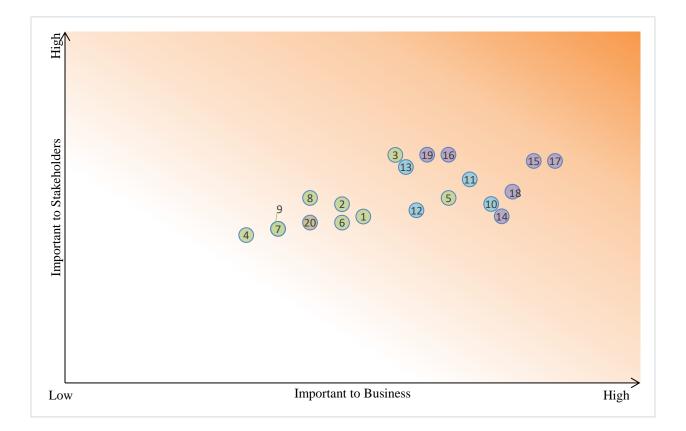
#### **MATERIALITY ASSESSMENT**

The Group sees the importance to the identification and management of sustainable development issues. To make sure ESG topics are being managed and reported in line with their materiality, we use a three-step assessment process.

Step 1: Identification	Step 2: Prioritisation	Step 3: Validation
All fundamental sustainability	Internal and external	The ESG working group of
topics were identified in	stakeholders were invited to	the Group validated and
accordance with the ESG	participate in a questionnaire	confirmed the key material
Guide. With reference to the	to rate the importance of the	ESG issues for ensuring all
Group's business	selected ESG topics to the	the identified material ESG
development strategies,	Group's development from	topics, which were
historical materiality	their perspectives. Results of	important to the business
assessment result and	the questionnaires were	development, were
industrial practices, the Group	analysed to generate ESG	reported and in compliance
has determined 20 relevant	materiality ranking.	with ESG Guide.
ESG topics that are deemed to		
have impacts on the		
environment and society		
through our operations.		

Results of the materiality assessment were analysed and presented as a materiality matrix. Product quality assurance remains a critical issue of paramount concern to the Group. We consider the findings of the assessment to be significant indicators that will guide our future planning and ESG policymaking. Leveraging these insights, we aim to promote sustainable growth and strengthen our ESG policies.

#### **Materiality Matrix**



#### Environmental

- 1. Air emissions
- 2. Greenhouse gas ("GHG") emissions
- 3. Hazardous waste
- 4. Non-hazardous waste
- 5. Energy consumption
- 6. Water consumption
- 7. Packaging consumption
- 8. Environment and natural resources
- 9. Climate change

#### Social

- 10. Employment
- 11. Occupational health and safety
- 12. Development and training
- 13. Labour standards

#### **Operating practices**

- 14. Supply chain management
- 15. Customer satisfaction
- 16. Intellectual property rights protection
- 17. Product quality assurance
- 18. Customer data protection and privacy
- 19. Anti-corruption

#### Community

20. Community investment

#### **ENVIRONMENT**

The Group understands the importance of green economy and maintaining environmental sustainability in its daily operations, and is fully conscious of the environmental impacts that may arise from its business operations. We are now facing severe global challenges, including climate changes. In view of the recent occurrences of extreme weather caused by climate change, the Group is fully aware of its duties as a responsible corporate in protecting the environment by reducing its overall GHG emissions and improving its water conservation efforts and energy efficiency, and aims at operating its business activities in compliance with all applicable national and regional rules and regulations from time to time.

Hence, the Group is committed to protecting environment proactively and complying with relevant environmental laws, rules and regulations in Hong Kong and the People's Republic of China ("PRC") in which it operates its businesses. We have implemented proper measures to reduce wastes and GHG emissions, while maintaining and providing safe and high-quality products and services to our customers. In order to mitigate wastes, and use energy and resources more wisely, we have adopted principles to reduce, reuse and recycle in our plants and offices in Hong Kong and the Mainland. Employees have been nurtured and encouraged to have energy conservation and environmental protection consciousness.

Starting from 2018, through regular monitoring and active management, we respond to environmental risks and changes in the external environment in a prompt manner. We also strengthen our 5S Management, which are known as "sort", "set in order", "shine", "standardise" and "self-discipline" in both manufacturing plants in order to make the production lines greener and more environmentally friendly. We continue to devote our efforts in environmental protection by implementing policies and measures discussed hereunder, so that our businesses and the communities in which we operate can be benefited.

We have adopted various policies, procedures and measures which would be updated and revised from time to time to reduce GHG emissions, wastes generated and energy consumption in our plants and offices in Hong Kong and the Mainland as shown below:

GHG Emissions	Wastes Generated	Energy Consumption
Procedures of handling	• Management on the handling	• Measures on effective energy
excess emissions and	of hazardous waste system	conservation
measures on reduction of		
emissions		
	• Regulations and methods on	• Guidelines on resources
	the waste treatment	conservation in Offices and
• Regulations on the		environmental protection
management, prevention and		
control of waste	Regulations on hazardous	Regulations on
gas pollution	chemicals management	energy-savings management
• Degulations on the	• Deculations on wests	• Degulations on usage of
Regulations on the management	Regulations on waste     management	Regulations on usage of     office resources
of waste gas	management	office resources
of waste gas		
	• Risk identification,	• Regulations on management
	assessment	of energy-saving and
	and control procedures	consumption reduction
	1	
	• Regulations on the	
	management	
	of waste water	

#### **Environment Management System Authentication**

The latest certificates, ISO14001:2015 Environment Management System Certificate, were obtained by Jiaxing Eastern Steel Cord Co., Ltd. ("JESC") and Tengzhou Eastern Steel Cord Co., Ltd. ("TESC") in October 2023 and December 2023 respectively. These systems have been operating effectively and reviewed annually by WIT Assessment Company Limited and Shanghai NQA Certification Co. Ltd. respectively. The respective certificates are valid till October 2026 and December 2026.

#### **Energy Management System Authentication**

The latest certificate, ISO50001:2018 Energy Management System Certificate, were obtained by JESC and TESC in May 2023 and December 2023 respectively. These system have been operating effectively and reviewed by WIT Assessment Company Limited and Sinolight Inspection & Certification Co., Ltd respectively. The respective certificates are valid till March 2026 and December 2026.

#### **Quality Management System Authentication**

The latest certificates, IATF16949:2016 Quality Management System Certificate, were issued by TÜV Rheinland Cert GmbH, to JESC and TESC in December 2023. The latest certificate, ISO9001:2015 Quality Management System Certificate, was obtained by TESC in December 2023. These systems have been operating effectively. These certificates are valid till December 2026 and January 2027.

#### **EMISSIONS**

The Group strictly monitors and controls the generation of wastes, sewage discharges and GHG emissions during the production process, and ensures all the emissions and discharges are within environmental quality standards as set out by the local government of the place where our businesses operate to mitigate negative impacts on the environment. These laws, ordinances and regulations include the Environmental Protection Law of the PRC (《中國環境保護法》), the Environmental Protection Tax Law of the PRC (《中國環境保護稅法》), the Water Pollution Prevention and Control Law of the PRC (《中國大污染防治法》), the Prevention and Control of the PRC (《中國大氣污染防治法》), the Waste Disposal Ordinance (Chapter 354 of the Laws of Hong Kong), and the Product Eco-responsibility Ordinance (Chapter 603 of the Laws of Hong Kong) etc..

#### **GHG Emissions and Other Pollutants Emissions**

The Group is committed to reducing air emissions, GHG emissions and other pollutants' emissions in all our areas of operation as far as practicable. We have implemented and improved the aforesaid policies and measures since inception and from time to time to suit the need of environmental protection law requirements. To reduce GHG and other pollutants, we have adopted several measures, for example, selling products with minimal packaging, using less heat and air-conditioning in our manufacturing plants of the steel cord segment.

The amount of total air pollutants in 2024 has decreased as compared to that of 2023, and the total air pollutants per thousand tonnes of production volume is less than that of 2023. Further details in respect of other energy-saving measures are illustrated in the section of "Emissions Target and Steps Taken to achieve it" in this ESG Report.

Details of the data of air emissions is set out under the headings "Air Emissions" and "GHG Emissions". We continue to appoint environmental technicians in the steel cord segment to monitor all emissions from the plants and report to their managers/supervisors immediately if the emission amount exceeds the standards required under the relevant environmental laws and regulations.

#### Sewage Discharge Management

Since 2019, to ensure the release of sewage to the sewer complies with the standards under the Environmental Quality Standard for Surface Water (《地表水環境品質標準》) and Wastewater Quality Standards for Discharge to Municipal Sewers (《污水排入城鎮下水道水質標準》) of the PRC, both plants have set up sewage treatment stations to collect and dispose of domestic sewage and industrial sewage. Besides, they have also set up condensate receivers to collect and reuse water after steam cooling from steam condensate return systems in the production lines. They monitor the pH value and Chemical Oxygen Demand ("COD") daily at regular intervals, and detect heavy metals ions of industrial sewage in the sewer from time to time. Immediate actions will be taken to stop the discharge of industrial sewage if emissions are discovered to be excessive, and perform exhaustive inspection to ensure all emissions are in compliance with the standard requirements as set out by the PRC environmental regulatory authority. JESC obtained a Jiaxing province Pollutant Discharge Rights Permits and a national Pollutant Discharge Permits and issued by Jiaxing Ecology and Environment Bureau in February 2022 and June 2020 respectively. They are valid till December 2025 and June 2025 respectively. These Permits aim to regulate and restrict pollutant discharge units, and to ensure compliance with the regulatory requirements of the relevant environmental laws. In addition, JESC has installed four online waste water monitoring systems in March 2020, to ensure that the waste water discharge can meet the standard required. TESC has strengthened the management of sewage treatment infrastructures, targeted monitoring of sewage treatment in various sectors, and is committed to stabling sewage discharge (even achieve zero discharge). During the years ended 31 December 2024 and 2023, the pH value, COD and heavy metals ions of industrial sewage were lower than the stipulated standards. Further details in respect of other energy-saving measures are illustrated in the section of "Energy Use and Water Efficiency Targets and Steps Taken to achieve them" in this ESG Report.

#### **Waste Management**

A hazardous waste treatment system and waste treatment procedures have been established which formulated provisions for collection, storage, and disposal of hazardous wastes generated in production lines. Qualified disposal enterprises in accordance with the Measures for Hazardous Waste Operation Administration (《危險廢物經營授權管理辦法》) and the Environmental Pollution by Solid Wastes of Prevention and Control Law of the PRC (《中國固體廢物污染環境防 治法》) have been engaged to dispose of hazardous wastes properly. All of the non-hazardous wastes were disposed of by engaging recycling enterprises for recycling and reusing or by using other legitimate measures. In order to strengthen the environmental awareness of the employees, JESC established an environmental protection team to manage the classification of hazardous wastes, solid wastes and domestic garbage generated from the operation of the production, record and real-time track all the wastes produced every day, and the results are obvious. JESC has also built a new hazardous waste warehouse in the same year to better manage and control the amount of the wastes generated. Since 2017, JESC has tested and installed a new emulsion condensed evaporator to condense the density of lubricant. Further details in respect of the disposal of hazardous and non-hazardous wastes are illustrated in the section of "Hazardous and Non-hazardous Wastes" in this ESG Report. In addition, further details in respect of other energy-saving measures are illustrated in the section of "Hazardous and Non-hazardous Wastes **Reduction Targets and Steps Taken to achieve them**" in this ESG Report.

#### **Air Emissions**

In general, the key air pollutants include nitrogen oxides, sulphur oxides and the respiratory suspended particles. The air pollutants of the Group are mainly generated from the gaseous fuel consumption in the production lines of the steel cord segment. The related data of air emissions<sup>(1)</sup> for the years ended 31 December 2024 and 2023 are as follows:

#### **Steel Cord Segment**

Types of air pollutants (tonne(s))	2024	2023
Nitrogen oxides	18.84	19.64
Sulphur oxides	1.58	1.48
Respiratory suspended particles	1.72	1.34
Total air pollutants	22.14	22.46
Total air pollutants per thousand tonnes of production		
volume (tonne(s)/'000 tonnes)	0.09	0.10

1. The above air emissions data presented in nitrogen oxides, sulphur oxides and the respiratory suspended particles were provided from a third-party inspection agency.

- 2. The amount of total air pollutants in 2024 has decreased as compared to that of 2023 by approximately 1.4%, and the total air pollutants per thousand tonnes of production volume is less than that of 2023. Other details are illustrated under the heading "GHG Emissions and Other Pollutants Emissions".
- 3. The Offices mainly provide management and consulting services to the Group and there is no production line. Thus, the table did not list out the relevant ESG data of the segment.

#### **GHG Emissions**

GHG emissions come from all sorts of everyday activities, principally from electricity consumption, combustion of natural gas and driving. The increase in GHG emissions is one of the main reasons for the rise of the global temperature and occurrence of extreme weather and carbon dioxide is the major GHG emitted through human activities. We are committed to managing our GHG emissions by reducing flaring and improving the efficiency in use of energy and resources in our day-to-day operations.

The GHG emissions of the two segments for the years ended 31 December 2024 and 2023 are as follows:

	Steel Cord Segment		egment Offices		Total	
	2024	2023	2024	2023	2024	2023
Direct emissions (tonne(s)) (Scope 1)						
Corporate fleet <sup>(4)</sup>	69.30	68.61	35.29	22.10	104.59	90.71
Natural gas	26,092.85	24,833.76	N/A	N/A	26,092.85	24,833.76
Total emissions (tonne(s)) (Scope 1)	26,162.15	24,902.37	35.29	22.10	26,197.44	24,924.47
Indirect energy emissions (tonne(s)) (Scope 2)						
Electricity	236,856.90	265,624.86	24.91	21.36	236,881.81	265,646.22
Total emissions (tonne(s)) (Scopes 1 and 2)	263,019.05	290,527.23	60.20	43.46	263,079.25	290,570.69
Total emissions per thousand tonnes of production volume (tonne(s)/'000 tonnes)	1,069.35	1,284.99	N/A	N/A	N/A	N/A
Total emissions per metre square of gross floor area (tonne(s)/m <sup>2</sup> )	N/A	N/A	0.05	0.06	N/A	N/A

- 1. Due to the implementation of energy-saving measures and change in the emission factors during the year, the total GHG emissions and emissions per thousand tonnes of production volume in the steel cord segment have decreased in 2024 as compared to that of 2023. For Offices, the employee numbers and the gross floor area of the Offices rose, therefore the GHG emissions of Offices in 2024 have increased as compared to that of 2023.
- 2. Due to the operation needs of the steel cord segment, GHG emissions mainly come from the combustion of natural gas and electricity consumption.
- 3. GHG emissions factors are calculated based on the Report on GHG Emissions and Removals for Buildings (Commercial, Residential or Institutional Purposes) issued by the EPD and the EMSD, Guide to Low Carbon Office issued by the EPD, Legislative Council Complex Greenhouse Gas Accounting Report issued by CCA, 2023 Emission Reduction Project China Regional Grid Baseline Emission Factors (using the average of the operation margin and build margin) published by the NCSC.
- 4. Emissions from corporate fleet only include the transportation of employees as we do not have our own corporate fleet to transport/deliver our products to customers in steel cord segment.

#### Hazardous and Non-hazardous Wastes

Other hazardous and non-hazardous wastes (apart from air pollutants and GHG emissions) generated for the years ended 31 December 2024 and 2023 are as follows:

#### **Steel Cord Segment**

Types of hazardous wastes (tonne(s))	2024	2023
Solid wastes		
Sludge from sewage treatment station	1,092.38	1,059.00
Sludge from lubricating station	314.06	289.99
Total solid wastes	1,406.44	1,348.99
Total solid wastes per thousand tonnes of production volume (tonne(s)/'000 tonnes)	5.72	5.97
Liquid wastes		
Lubricant	916.53	1,220.76
Used acid	11,729.45	10,702.75
Total liquid wastes	12,645.98	11,923.51
Total liquid wastes per thousand tonnes of production volume (tonne(s)/'000 tonnes)	51.41	52.74
Sewage		
Industrial and domestic sewage	478,268.00	459,183.00
Total sewage per thousand tonnes of production volume (tonne(s)/'000 tonnes)	1,944.49	2,030.95

1. In accordance with the List of National Hazardous Wastes formulated by the Environmental Pollution by Solid Wastes of Prevention and Control Law of the PRC (《中國固體廢物污染環境防治法》), all the captioned wastes we have recorded are defined as hazardous wastes.

2. Sewage was discharged of from the business units of the PRC and consumption data was based on the amount of sewage discharged.

3. Due to the increase in the production volume during the year, the total amount of hazardous wastes in 2024 has increased as compared to that of 2023, but the hazardous wastes per thousand tonnes of production volume is less than that of 2023.

#### **Steel Cord Segment**

Types of non-hazardous wastes	2024	2023
Industrial wastes (tonne(s))		
Scrapped rod ties, scrapped wires and steel wire rod ties	8,126.97	8,736.13
Oxidised surface of steel wire rod	1,051.06	903.53
Total industrial wastes	9,178.03	9,639.66
Total industrial wastes per thousand tonnes of production		
volume (tonne(s)/'000 tonnes)	37.31	42.64
Metallic wastes (unit(s))		
Scrapped spools	5,473.58	7,042.44
Total metallic wastes per thousand tonnes of production		
volume (unit(s)/'000 tonnes)	22.25	31.15
Packaging wastes (tonne(s))		
Scrapped plastic separators	5.66	22.99
Scrapped plastic bags	90.79	66.57
Used packaging plastic ties	7.35	5.15
Used packaging plastic bags for steel wire rod	260.79	258.13
Total packaging wastes	364.59	352.84
Total packaging wastes per thousand tonnes of production		
volume (tonne(s)/'000 tonnes)	1.48	1.56
Other wastes (tonne(s))		
Used powdered lubricant	280.93	244.22
Total used powdered lubricant per thousand tonnes of		
production volume (tonne(s)/'000 tonnes)	1.14	1.08
Scrapped wooden brackets	66.03	122.41
Total scrapped wooden brackets per thousand tonnes of		
production volume (tonne(s)/'000 tonnes)	0.27	0.54

1. The aforesaid wastes generated in production lines of the steel cord segment were disposed of properly by those qualified disposal enterprises to mitigate the impact on the environment and those wastes are not defined as hazardous wastes according to the "List of National Hazardous Wastes". Those wastes could be properly disposed of and re-used.

2. Due to the increase in the production volume during the year, the amount of packaging wastes and used powdered lubricant has increased in 2024 as compared to that of 2023, but the amount of non-hazardous wastes per thousand tonnes of production volume is less than that of 2023.

#### **Offices**

Types of non-hazardous wastes	2024	2023
Paper wastes collected for recycling (kg(s)) <sup>(1)</sup>	621.0	764.0

- 1. The total amount of paper wastes collected for recycling in 2024 decreased when compared to that of 2023, as the Group continues to implement the measures for reducing papers.
- 2. In 2024 and 2023, the Offices did not produce any hazardous wastes.
- 3. Paper wastes collected for recycling commenced from the third quarter of 2016, including shredded paper and old newspapers. Since 2020, we started to recycle old newspapers, in calculating the amount of paper wastes collected for recycling.
- 4. Due to our administrative operation in the Offices, we inevitably consume large amounts of paper. The Group has stepped up its efforts in lowering the paper consumption in the Offices and has adopted principles to reduce, reuse and recycle in the Offices. To lower the impacts from the unavoidable consumption, we are also committed to enhancing our efforts in paper wastes recycling, while lowering paper consumption in the meantime. For details in respect of the measures on paper recycling implemented in the Offices are illustrated under the section of "THE ENVIRONMENT AND NATURAL RESOURCES" in this ESG Report.

#### **Emissions Target and Steps Taken to achieve it**

The Group is committed to playing our parts in reducing emissions in order to fight climate change and devote our efforts to protect the environment.

Our emissions target in 2030:

• reduce total GHG emissions per thousand tonnes of production volume by 20% in the steel cord segment as compared to that in 2021

We aim to reduce emissions year by year, and have implemented a series of energy-saving steps. JESC has fully utilised the smart energy management system to promote orderly electricity consumption and reduce comprehensive energy consumption and GHG emissions. In addition, JESC and TESC have constructed photovoltaic power stations and put into use for power generation to reduce GHG emissions. TESC reduced energy consumption through equipment enhancement and replacement of high-energy-consuming facilities with green, environmentally friendly and energy-saving facilities. Also, TESC has strengthened the inspection of equipment and dealing with problems in a timely manner, so as to reduce downtime, improve equipment utilisation, and reduce energy consumption.

The energy-saving KPI was established in TESC and was included in the scope of employee performance appraisal, so as to promote energy conservation among employees. Apart from the above measures, JESC renovated dust removal system of dry drawing production process, and installed an industrial dust collector for dry drawing machines, replacing the original ten dust removal towers. Furthermore, technical transformation of electroplating line in the east area was also carried out, three acid mist purification towers were integrated into one, which greatly reduced the emission of waste gas.

Besides, we use energy efficient equipment, reuse water produced by the condensation of steam in production lines and reduce electricity, water and paper consumption in the Offices to mitigate emissions. Since 2017, we place great emphasis on the promotion of the concept of environmental protection by participating in the "Green Office Awards Labelling Scheme" ("GOALS") and "Eco-Healthy Workplace Awards Labelling Scheme" ("Eco-Healthy Workplace") organised by the World Green Organisation ("WGO") to increase the awareness on physical and mental health of employees on workplace and be able to identify and apply reduction opportunities, ranging from energy, water and paper consumption to carbon at the office to assess and improve the environmental footprint.

To show our continual support on the promotion of green office, we will continue to participate in GOALS and Eco-Healthy Workplace. The idea of GOALS has become the mindset of our colleagues in our subsidiaries in the Mainland, they are now accustomed to switching off the lights when they leave their office and switching off lights that are not in use. Sticking labels beside the light switch is just a reminder to strengthen employees' awareness on the importance of electricity saving. We will continue to spare no effort in strengthening and improving the current measures and policies in mitigating emissions. The effectiveness of the measures will be reviewed periodically in order to seek continuous improvement in the efficient use of energy and resources. Further details in respect of green measures implemented in Offices are illustrated in the section of "**THE ENVIRONMENT AND NATURAL RESOURCES**" in this ESG Report.

#### Hazardous and Non-hazardous Wastes Reduction Targets and Steps Taken to achieve them

We are committed to reducing waste generation in our operations for the sake of minimising our environmental impacts. We monitor the waste generated in our production process to look for reduction opportunities as our target.

Our hazardous and non-hazardous wastes reduction targets in 2030:

- reduce total hazardous wastes per thousand tonnes of production volume by 10% in the steel cord segment as compared to that in 2021
- reduce total non-hazardous wastes per thousand tonnes of production volume by 5% in the steel cord segment as compared to that in 2021

To achieve the targets, the Group has entered into contracts in respect of the disposal of the sludge from sewage station and lubricating station, used acid and lubricant between qualified disposal enterprises. These hazardous wastes generated in production lines of the steel cord segment were disposed of properly by those qualified disposal enterprises in accordance to the Standard for Pollution Control on Hazardous Wastes Storage (《危險廢物貯存污染控制標準》) regulated in the PRC and the Law of the PRC on the Prevention and Control of Environmental Pollution by Solid Waste (《中國人民共和國固體廢物污染環境防治法》). In addition, JESC has completed a sludges desiccation project in December 2022, reduced the amount of sludges disposal, and saved the related disposal fee. All used wrapping papers, metallic and plastic packaging ties, plastic films, paper cores and scrapped wood pallets incurred in production lines of the steel cord segment had also been disposed properly by those qualified disposal enterprises if possible. JESC optimised the pickling process to reduce the discharge of used acid, thereby saved the related disposal fee. We actively dispose paper wastes and old newspapers to recycling enterprises for recycling or reusing. Further details in respect of the measures on green measures implemented in the Offices are illustrated in the section of "THE ENVIRONMENT AND NATURAL RESOURCES" in this ESG Report.

#### **USE OF RESOURCES**

The Group has adopted a set of specific and efficient policy in the use of resources in the production lines and spares no effort in nurturing and encouraging employees to have practices for energy and resources conservation. The Group has also implemented various measures to reduce paper, water and electricity consumption in production lines and the Offices. To monitor the implementation of energy consumption measures, environmental technicians and/or the manager of Human Resources and Administration Department are responsible for monitoring the use of energy and resources in the production lines and the Offices. The Group also started the work of utilising green steel raw materials during the year. Details of the green measures are set out under the heading "THE ENVIRONMENT AND NATURAL RESOURCES" in this ESG Report.

#### **Direct and Indirect Energy Consumption**

The energy consumption data of the two segments for the years ended 31 December 2024 and 2023 are as follows:

	Steel Cord Segment		Offices		Total	
	2024	2023	2024	2023	2024	2023
Direct energy consumption (MWh)						
Natural gas <sup>(3)</sup>	134,754.25	128,251.82	N/A	N/A	134,754.25	128,251.82
Petrol	287.43	284.54	146.36	91.66	433.79	376.20
Total direct energy consumption (MWh)	135,041.68	128,536.36	146.36	91.66	135,188.04	128,628.02
Indirect energy consumption (MWh)						
Electricity consumption	486,708.93	450,555.27	51.18	33.26	486,760.11	450,588.53
Total direct and indirect energy consumption (MWh)	621,750.61	579,091.63	197.54	124.92	621,948.15	579,216.55
Total energy consumption per thousand tonnes of production volume (MWh/'000 tonnes)	2,527.84	2,561.30	N/A	N/A	N/A	N/A
Total energy consumption per metre square of gross floor area (MWh/m <sup>2</sup> )	N/A	N/A	0.17	0.19	N/A	N/A

1. Energy consumption data was measured based on the amount of electricity, fuels and gas consumed and energy conversion factors had taken reference from the Bioenergy Feedstock Development Program at Oak Ridge National Laboratory and A Beginner's Guide to Energy and Power, an article submitted by N Packer, Staffordshire University, UK, February 2011.

- 2. The total amount of direct and indirect energy consumption of the steel cord segment in 2024 increased when compared to that of 2023. This is mainly attributable to the increase in the production volume of the steel cord segment during the year, thus resulted in a significant increase in energy consumption, but the total energy consumption per thousand tonnes of production volume is less than that of 2023. Details of the energy-saving measures in the production lines are illustrated under the heading "Energy Use and Water Efficiency Targets and Steps Taken to achieve them" of this ESG Report.
- 3. Natural gas was consumed in the combustion furnace at production lines of the steel cord plants.

#### **Water Consumption**

Water is a paramount resource in the running of our operation and production, therefore we are acutely aware of water resources consumption and aim to maximise our water utilisation efficiency. Currently, the water resources supply comes primarily from local municipal water supply, rivers and lake water. We have installed condensate receivers to collect and reuse water after steam cooling from steam condensate return system in the production lines.

The water consumption data of the two segments for the years ended 31 December 2024 and 2023 are set out as follows:

	Steel Cord Segment		Offices		Total	
	2024	2023	2024	2023	2024	2023
Total water consumption (m <sup>3</sup> )	997,386.48	919,744.14	103.18	27.32	997,489.66	919,771.46
Total water consumption per thousand tonnes production volume (m <sup>3</sup> /'000 tonnes)	4,055.06	4,068.00	N/A	N/A	N/A	N/A
Total water consumption per metre square of gross floor area $(m^3/m^2)$	N/A	N/A	0.09	0.04	N/A	N/A

- 1. The data of amount of water is quoted by the water bills received and bottled water consumed.
- 2. The amount of total water consumption of steel cord segment in 2024 has increased significantly as compared to that of 2023, this is mainly attributable to the increase in the production volume during the year, but the total water consumption per thousand tonnes of production volume is less than that of 2023.

#### Energy Use and Water Efficiency Targets and Steps Taken to achieve them

Our production processes are inevitably water-intensive, so we strive to reduce water consumption and protect the environment.

Our energy use and water efficiency targets in 2030:

- reduce total energy consumption per thousand tonnes of production volume by 3% in the steel cord segment as compared to that in 2021
- reduce total water consumption per thousand tonnes of production volume by 3% in the steel cord segment as compared to that in 2021

We take the following steps to achieve the targets:

- 1. Carrying out preheat recovery of air compressors, use it for daily hot water and to save steam usage and steam costs;
- 2. Replacing some high-energy consumption transformers by JESC, upgrading the energy efficiency level to the first-level energy efficiency to reduce power consumption;
- 3. Generating electricity from the photovoltaic power generation facilities on the roof of TESC's factory building, to save electricity consumption;
- 4. TESC has set up a new sewage treatment station to process the domestic sewage and industrial sewage, so as to save production water;
- 5. Setting up two sets of harmonic management devices to reduce heating rate of cables and other production machinery and equipment;
- 6. Using energy efficient equipment, such as motors, frequency converters, reactors and the cross-sectional area of the cable in the power supply system to reduce the usage of electricity;
- 7. Reducing the amount of water consumption in the production lines through the reuse of water after steam cooling from steam condensate return system in steel cord segment;
- 8. JESC analysed water consumption every day through the smart energy management system, and deal with any abnormality in time to avoid wasting water and reduce water consumption;
- 9. Adopting water-saving measures, for example, after the drainage water from the cooling towers is purified, it is reused in the cooling towers to reduce the amount of new water supplement;
- 10. Reducing the amount of electricity consumption in the production line of TESC through upgrading and improving the production equipment of TESC's manufacturing plant;

- 11. Modifying and maintaining the air-conditioning system and ventilation system of TESC's steel cord plant to reduce the usage of electricity;
- 12. Using energy efficient LED lighting rather than fluorescent lamp; and
- 13. Selling products with minimal packaging.

JESC was listed as one of the water-saving enterprises in Zhejiang Province in 2019, which will remain in force for a period of five years, which is jointly recognised by Jiaxing Municipal Bureau of Economic and Information Technology, Jiaxing Municipal Bureau of Housing and Urban-Rural Development and Jiaxing Municipal Water Conservancy Bureau. The list is used to strengthen the work guidance for water-saving enterprises to improve water efficiency and promote the green and high-quality development of enterprises.

The Group has also implemented energy-saving steps in the Offices as stated under the heading "THE ENVIRONMENT AND NATURAL RESOURCES" in this ESG Report.

#### Packaging Materials for Finished Products

The Group encourages reusing and recycling certain materials like spools and wooden pallets so as to reduce wastes. However, we understand that finished products produced by the steel cord segment should be packed properly and follow customers' instructions before delivery so as to avoid any damage during transportation. Therefore, packaging materials could not be reduced significantly, in particular when the production volume increased. The types and data of package materials for steel cord segment for the years ended 31 December 2024 and 2023 are as follows:

#### **Steel Cord Segment**

Types of packaging materials	2024	2023
Wooden, plastic and metallic pallets (unit(s))	212,632.00	225,710.00
Total wooden, plastic and metallic pallets per thousand		
tonnes of production volume (unit(s)/'000 tonnes)	864.49	998.31
Spools (unit(s))	10,304,289.00	9,777,548.00
Total spools per thousand tonnes of production volume		
(unit(s)/'000 tonnes)	41,893.97	43,245.80
Plastic bags (unit(s))	242,707.00	224,778.00
Total plastic bags per thousand tonnes of production		
volume (unit(s)/'000 tonnes)	986.77	994.19
Cardboard boxes (unit(s))	203,493.00	189,548.00
Total cardboard boxes per thousand tonnes		
of production volume (unit(s)/'000 tonnes)	827.34	838.37
Plastic scale boards (piece(s))	1,033,276.00	887,881.00
Total plastic scale boards per thousand tonnes of		
production volume (piece(s)/'000 tonnes)	4,200.97	3,927.07
Humidity indicators (piece(s))	214,149.00	204,551.00
Total humidity indicators per thousand tonnes of		
production volume (piece(s)/'000 tonnes)	870.66	904.72
Desiccants (tonne(s))	1,195.82	1,119.32
Total desiccants per unit of production volume		
(tonne(s)/'000 tonnes)	4.86	4.95
Packaging ties (tonne(s))	72.14	66.19
Total packaging ties per thousand tonnes of production		
volume (tonne(s)/'000 tonne)	0.29	0.29

1. Due to the increase in the production volume during the year, the amount of most packaging materials in 2024 has increased as compared to that of 2023, but the amount per thousand tonnes of production volume is less than that of 2023.

## THE ENVIRONMENT AND NATURAL RESOURCES

We understand that our business nature would have an impact on the environmental and natural resources. Thus, continuous efforts have been put into minimising such impact by implementing various measures at the Offices and production lines as far as we could so as to generate profits and return to the shareholders simultaneously, and also protect the environment. We have adopted various green measures to mitigate the impact of the renovation of the Offices and to achieve better furnishment to make our offices greener.

We encourage employees to go green at Offices by implementing the following steps:

	Green Steps
Lighting	• During the period from 1:10 p.m. to 1:50 p.m. (lunch time) and from 6:00 p.m. (after office hours) on business days, only those lighting which are essentially needed for safety, security or other specific purposes are maintained by adopting timer or plug load controller.
	• Switch off lights that are not in use. Those lighting which are in individual office areas are mandatory to switch off when the occupier is away or out for work.
	• Non-essential lighting should be switched off if there are only few people working in the office.
	• The last-man-out should check and turn off the lighting of all areas of the office.
	• Use energy efficient LED lighting rather than fluorescent lamp or tungsten filament lamp.
	• Monitor the implementation of the switch off light policy daily.
Air-conditioning	• Individual air-conditioner can be adjusted manually to suitable temperature. It is recommended to adjust the temperature of individual air-conditioner to 25°C or above to save energy.
	• The last-man-out should check and switch off the air-conditioning of all areas of the office. Individual office users should check and ensure that the air-conditioner is turned off before leaving.
	• Affix stickers as a reminder to encourage employees switch off air-conditioning when not in use.
	• Alternative ventilation systems, e.g., fans, were available and good enough for normal air ventilation without air-conditioning.

٩	• Individual office equipment with energy label (e.g., computers and monitors with EU Energy Star) were adopted.
•	• Air-conditioning system was well-maintained regularly to maintain efficiency.
Office Equipment	• Affix "Save Energy" stickers near the main power switches as a reminder to employees.
	• Computers, monitors and individual multi-functional printers (if any) should be switched off after office hours or when leaving the workplace to reduce power consumption.
	• All computers shall preset time for standby or hibernate mode. Switch computers to sleep or hibernate mode and switch off monitors when they are idle to reduce power consumption.
	• The auto energy-saving mode of the computer has been activated and the brightness of the screen of the monitor has been lowered to reduce power consumption.
	• 22-inch LED monitors were widely adopted in office for higher resolution so that the chance of eye problems can be reduced.
•	• LED monitors instead of Cathode Ray Tube monitors were used in order to save the consumption of electricity.
	• Multi-function device (includes printing, scanning, photo copying and fax) was used and well-maintained to prevent waste of paper.
	• Purchase environmentally friendly stationery and office equipment as priority. Stop purchasing and using stationery and office equipment which may cause a negative impact to the environment.
•	• Employees should reuse stationeries, e.g., paper clips, folders, binders and envelopes.
	• Refrigerator and cool water dispenser were kept away from sunlight, well-ventilated and well-maintained.
	• Unwanted materials and thick ice were regularly cleared and defrosted from refrigerator.
	• The last-man-out should check and turn off all office equipment.
Water	• Strengthen the daily maintenance of water supply equipment. Employees should inform the property management office through Human Resources and Administration Department for carrying out repairing work promptly once water supply equipment is damaged.
	• Employees are reminded to shut water taps after use at drinking water and pantry area.

	• Cleaning staff or drivers should clean with wet mop or cloth instead of flushing.
	• Employees were encouraged to report leaks and drips.
	• Water taps are equipped with automatic open or close sensor to save water.
	• Dual flush cistern was adopted for toilet.
Behavioural Change	• Employees should adjust the margins and font size of documents in order to optimise the use of paper, use double-sided copying, reuse single-sided paper, shred non-useful papers instead of throwing away together with domestic wastes, prevent unnecessary and wrong printing and avoid colour printing and copying to conserve more ink.
	• To nurture employees the habits of waste separation at source, waste separation bins have been positioned at pantry for collecting glass, plastic and metallic wastes. Other domestic wastes which cannot be recycled should be placed in existing garbage bins. Printed waste papers after shredding will also be arranged to be disposed of by recycling enterprises for recycling.
	• Employees should purchase in bulk (e.g., barreled fresh water) to reduce resource utilisation by transportation.
	• Buy toners and inks that can be refilled to avoid more metallic or plastic cartridges disposed of to landfills.
	• Use reusable utensils and refuse to use disposable cups, plates, forks and other utensils.
	• Pen refills instead of new pen will be provided when used up.
Others	• Recycle the cartridges by manufacturer or EPD assigned recyclers (e.g., Computer Recycling Programme).
	• Electronic documentation was available and widely adopted.
	• In-situ reminders such as signage, poster, friendly reminder for switch-off light and air-conditioner were placed in a prominent position.
	• Environmental awareness was continuously raised through different environmental programs and other means in which employees could actively participate in.
	• Umbrella stand was available to avoid using one-off umbrella bags.
	General greenery in office area.
	• Use environmentally friendly paper (wood-free paper) for printing annual report and circulars, etc
	• Building was within walking distance from public transport stops or transportation stations.

Through implementing the aforesaid steps, recycling of waste and recovery of resources, we believe that we can manage the negative impacts on the environment and use resources effectively and efficiently to the greatest extent. We are gratefully being awarded a Certificate of Recognition by WGO for the period from July 2024 to July 2025 by participating in the GOALS and Eco-Healthy Workplace as an affirmation to our contribution. We also commit to continuously improving our environmental performance in our production lines by installing more environmentally friendly production machinery and equipment.



### OUR RESPONSIBILITIES FOR ENVIRONMENTAL PROTECTION

### **CLIMATE CHANGE**

The emerging challenge of climate change creates visible and responding to climate change has become a global consensus. The Chinese government has also put forward the climate action goal of "striving to reach the peak of carbon dioxide emissions by 2030 and striving to achieve carbon neutrality by 2060".

The Group attaches great importance to climate change, and has identified and analysed the key climate-related risks in order to formulate actions to tackle with the potential impact on the long-term interests of the Group and other stakeholders. We believe that minimising the environmental footprint and strengthening energy-saving renovation, are essential to mitigate the adverse impact of climate change.

The Task Force on Climate-related Financial Disclosures divided climate-related risks into two major categories: (i) physical risks related to the physical impacts of climate change; and (ii) transition risks to achieve a lower-carbon economy.

The following table summarises the risks imposed to the Group brought by climate changes and respective mitigation measures taken.

Physical Risk	Mitigation Measures
Increased frequency of extreme weather events caused by climate change, leading to incidents and damage to factory properties. Since our business operations are only in indoor environment, we were less likely be affected by the extreme weathers such as floods, hurricanes, and droughts and other significant climate related issues	<ul> <li>Conduct property enhancement initiatives, strengthen building safety assessment and inspection to prevent and alleviate impacts due to extreme weather events, including flooding and typhoon</li> <li>Growing of perennial grass and stands of trees have been carried out as a means of wind barriers</li> <li>Precautionary measures have been taken by the Group, including work arrangements in the case of adverse weather conditions such as Typhoon Signal No. 8 or above or "black" rainstorm warning signal, as well as insurance coverage for fire, flood and typhoon damages to merchandise, furniture, fixtures and fittings</li> <li>Established the Typhoon and Flood Emergency Plan</li> </ul>

### OUR RESPONSIBILITIES FOR ENVIRONMENTAL PROTECTION

#### **Transition Risks**

**Mitigation Measures** 

#### A. Policy and Legal Risks

- China is expected to adopt more aggressive policies and measures to limit GHG emissions, thereby matching the national target of achieving carbon neutrality before 2060
- > The possibility of being regulated by the carbon trading system will bring uncertainty to the Group's business development
- Growing stakeholders' expectation on sustainability achievement. As the value of loss and damage arising from climate change grows, litigation risk of the Group is also likely to increase. Reasons for such litigation include the failure of organisations to mitigate impacts of climate change, failure to adapt to climate change, and the insufficiency of disclosure around material financial risks

#### B. Technology Risk

✓ Technological improvements or innovations that support the transition to a lower-carbon, energy efficient economic system involve the development and use of emerging technologies, that may affect the competitiveness of the Group, their production and distribution costs

#### C. Reputation Risk

 Customer, community and general public's perceptions of the Group's contribution to a lower-carbon economy

- ✓ Actively obtain policy trends and incorporate them into the Company's long-term planning in a timely manner
- ✓ Conduct regular reviews and analyses of local and international reporting requirements
- ✓ Actively consider to enhance reporting and data collection procedures through assistance from independent consultant
- Closely monitor the development of regulations on prudent financial management and disclosure relating to climate change
- ✓ Established an ESG working group to drive initiatives
- ✓ Study and optimise equipment energysaving renovation plans to further reduce equipment energy consumption
- ✓ Actively abide by the relevant policies and requirements relating to climate change to protect the Company's reputation
- ✓ Obtain relevant authentication (e.g. Environment Management System Energy Management Authentication. System Authentication, Quality Management System Authentication, EcoVadis Sustainability Authentication and Cleaner Production Enterprise Verification)
- ✓ Attach importance to supplier sustainability management and strengthen supplier sustainability related training

### OUR RESPONSIBILITIES FOR ENVIRONMENTAL PROTECTION

In the future, the Group will continue to analyse the key climate-related risks to understand the impacts on its operations and implement mitigation measures to enhance its resilience to climate change. We remain committed to adopting scientific and systematic management approaches to contribute to sustainable development and the global response to climate challenges.

#### **EMPLOYMENT**

#### **Our People and Safety**

Employees are the most critical assets of the Group and an integral part of its long-term sustainable development that their abilities, knowledge and experience cannot be replaced. It goes without saying that ensuring their safety and health at the workplace is of our top priority. The Group is committed to providing all employees with a harmonious, safe and healthy working environment.

During the year, we have implemented various measures to promote occupational health and safety at the workplace and ensure that employees work in a safe environment. This is also a part of the initiatives we have taken under GOALS and Eco-Healthy Workplace (collectively the "Schemes") organised by WGO. We have implemented some of the recommended practices listed in the guidelines of the Schemes, such as putting labels around the shelves and working stations to remind employees not to look at the computer screens for too long, using trolleys when carrying heavy objects, adjusting light intensity in the office for a comfortable and safe working environment, removing excess lighting in the areas that are too bright, placing computer screens at a right angle to the windows, placing the photocopiers in a designated area to reduce noise, keeping all sections of the office tidy and clean, disposing garbage into appropriate containers, placing air purifiers, cleaning carpets regularly and providing chairs with "height adjustable seat", "adjustable armrest" and "tilting backrest" to employees etc.. All the above measures are adopted in order to provide a safe and healthy working environment to our valuable employees of the Group. For further details regarding the Schemes, please refer to the heading "COMMUNITY INVESTMENT" in this ESG Report.

#### Management Systems for the Employees of the Group

The Group has prepared human resources policies, which are stipulated in employees' handbooks, notices, and relevant codes of conduct, and implemented employees' management systems in its business units. The abovementioned handbooks, notices, codes and systems cover the area of relevant rules and regulations in respect of compensation and dismissal, recruitment and promotion, working hours, rest periods, and other benefits and welfare. Regulations and rules set out in those handbooks, notices, codes and systems are in line with the applicable laws and regulations in Hong Kong and the PRC, including the anti-discrimination Ordinance (e.g. Sex Discrimination Ordinance (Chapter 480 of the Laws of Hong Kong)), Employment Ordinance (Chapter 57 of the Laws of Hong Kong), Employees' Compensation Ordinance (Chapter 282 of the Laws of Hong Kong), Occupational Safety and Health Ordinance (Chapter 509 of the Laws of Hong Kong), Company Law of the PRC (《中國 公司法》), Labour Law of the PRC (《中國勞動法》), Labour Contract Law of the PRC (《中國勞動法》), etc.. During the year under review, there was no material breach of or non-compliance with those applicable laws and regulations by the Group.

#### Compensation and Dismissal

We have formulated procedures and terms and conditions in the employees' handbooks to deal with those employees who violate any rules set out by the Group. A written warning notice will be given or immediate dismissal will be imposed to those employees according to the level of severity of each case. Human resources department of the concerned company should be consulted prior to the proposed dismissal of any employee so as to ensure the compliance with the legal requirements.

We will pay sufficient compensation to those employees subject to the aforesaid laws and regulations.

#### Working Hours and Rest Periods

The employees' handbooks and employment contracts have clearly specified the working hours of employees. For employees who are required to work on irregular hours or public holidays, overtime pay and additional compensation are offered as defined in their employees' job descriptions. The Group has complied with the relevant employment laws and regulations in respect of working hours and rest periods in Hong Kong and the PRC.

#### **Emolument Policies of the Directors and Employees**

The emoluments of the directors of the Company are determined by the remuneration committee of the Company according to his/her experience and duties, his/her role played in the Board, the Group's performance and profitability, the remuneration benchmark in the industry and the prevailing market conditions. The emolument policy of the Group's employees is also based on their merit, qualifications and competence as well as the prevailing market conditions of the industry. In general, remuneration packages, including discretionary bonus, are reviewed annually. In addition to salary payments, other employee benefits including medical subsidies, hospitalisation scheme and a defined contribution provident fund stipulated by the regulations of the PRC, Mandatory Provident Fund Scheme stipulated by the Mandatory Provident Fund Schemes Ordinance (Chapter 485 of the Laws of Hong Kong) and other retirement schemes or other similar defined contribution provident fund schemes have been provided as retirement benefits to employees in Hong Kong and the PRC respectively. Employees in the PRC are also entitled to other benefits under the Labour Law of the PRC (《中國勞動法》).

#### Equal Opportunity, Recruitment and Promotion

The Group is committed to protecting human rights and strictly prohibits any discrimination, harassment, victimisation or vilification of employees occurred at workplace in spite of their gender, physical or mental state, race, nationality, religion, age, family status or sexual orientation, or any other attributes recognised by the laws of the country in which the Group operates. We emphasise the prohibition of discrimination, especially sexual discrimination at workplace. Thus, we have established the Policy on Prevention of Sexual Harassment at Workplace.

The procedures of recruitment, promotion and retention of talents are implemented in accordance with the principles of equal opportunity under the Sex Discrimination Ordinance (Chapter 480 of the Laws of Hong Kong), Disability Discrimination Ordinance (Chapter 487 of the Laws of Hong Kong), Race Discrimination Ordinance (Chapter 602 of the Laws of Hong Kong), Family Status Discrimination Ordinance (Chapter 527 of the Laws of Hong Kong), Protection of Women's Rights and Interests Law of the PRC (《中國婦女權益保障法》), the Special Rules on the Labour Protection of Female Employees (《女職工勞動保護特別規定》) and Protection of Disability Law of the PRC (《中國殘 疾人保障法》).

In addition, we have adopted the "Policy for Nomination of a Director of the Company", which sets out the procedures for the selection, appointment and reappointment of Directors, with selection criteria including but not limited to considering the potential contributions a candidate can bring to the Board in terms of qualifications, skills, experience, independence and gender diversity.

The Group has formulated a promotion mechanism which sets out uniform selection criteria and guidelines for employees' promotion. Moreover, the Group has established a complaint channel for employees to make complaint if he/she has been suffered from any unfair treatments.

#### Personal Data Privacy

The Group respects personal data privacy and is committed to implementing and complying with the data protection principles and all relevant provisions of the Personal Data (Privacy) Ordinance (Chapter 486 of the Laws of Hong Kong) and codes of practice/guidelines issued by the Privacy Commissioner for Personal Data, Hong Kong for the collection of personal data from employees for the purpose of providing them with benefits, compensation, salary payments, performance assessment, promotion etc..

#### Diversity and Gender Mainstreaming

The Group has established a diversity policy for employees, regardless of their gender, age, religion, race and nationality but recruit them based on their skills and professions. All employees are entitled to the same rights of work, salary and benefits.

Since 2013, the Board has also established a Board Diversity Policy to attract and retain talented people as board members. The Board Diversity Policy has been reviewed and recommended by nomination committee members, and approved by Directors, such as increasing diversity at the Board level, including but not limited to gender, language, age, religion, social-economic status, cultural and educational background, ethnicity, professional experience, regional and industry experience, skills, knowledge, thinking styles, know-how and length of service, in particular focus on gender diversity, independence of independent non-executive Directors and skills and experience, as an essential element in supporting the attainment of the Company's objectives and its sustainable development. A summary regarding the Board Diversity Policy can refer to the "The summary of Board Diversity Policy and its measurable objectives" section on page 65 under the heading "CORPORATE GOVERNANCE REPORT" of the 2024 annual report of the Company.

Moreover, the Company has participated the Gender Focal Point Network (GFPN) which was jointly organised by the Labour and Welfare Bureau of the Government of the Hong Kong Special Administrative Region and the Women's Commission in promoting gender mainstreaming, which is a global strategy of the United Nations for the promotion of women's advancement and gender equality. Since joining GFPN, we are willing to communicate and cooperate with employees on gender-related matters in their daily work.

#### Communication with Employees

The Group values its employees as they are our important internal stakeholders and we believe that loyal employees help contribute the Group's business strategies as well as achieve goals and missions. In addition, the Group also pays attention to the opinions/suggestions of employees.

The two steel cord plants of the Group conduct an Employees' Satisfaction Survey every year by using a scoring assessment mechanism to indicate the employees' satisfaction level on their career prospects. Through the surveys, we can measure the engagement level of our employees to the companies and know whether employees are engaged or disengaged under common factors, such as promotion, benefits and compensation, working conditions, relationship with management, company culture etc.. Those surveys also provide employees with a channel for open feedback, thereby creating a platform for mutual communication. In addition, the information obtained from the surveys enables us to identify the strengths and opportunities for improving engagement in our Group. The Company has conducted the same Employees' Satisfaction Survey since 2016, aiming to collect employees' opinions/suggestions on career perspectives and submit the relevant employees' job satisfaction summary analysis report to the management for review. The management of the Company will consider and make response to the feedback from employees and refine the relevant human resources-related policies and systems, if practicable.

The Group is aware of the importance of safeguarding the rights and interests of employees, especially the production workers in the PRC, as those production workers constitute the majority of the Group's employees. If they are not satisfied with their salaries, meal allowance, working hours and conditions, apart from expressing their views/opinions to the management of the Group, they also have the right to report to the Chinese Trade Union and negotiate with their employers under the Trade Union Law of the PRC (《中國工會法》), Articles of Association of Trade Unions in the PRC (《中國工會章 程》) and Congress of Workers of the Industrial Enterprises Regulations (《全民所有制工業企業職工代表大會條例》). Our employees, including production workers, can present their opinions and recommendations at the Congress of Workers and Staff. All in all, we are pleased to listen to the needs and opinions from employees and provide various communication channels for employees to express their views regarding employment issues. We also obey the Special Rules on Labour Protection of Female Employees (《女職工勞動保護特別規定》) to protect the health of female employees.

### Total Workforce and Employee Turnover Rate by Gender, Employment Type, Age Group and Staff Hometown Region

Total workforce by gender, employment type, age group and hometown region of staff of the two segments as at 31 December 2024 and 2023 are as follows:

	Unit	Steel Core	l Segment	Off	ices	To	tal
		2024	2023	2024	2023	2024	2023
Total number of employees		2,440	2,370	58	43	2,498	2,413
By gender							
Male	No. of employees	2,048	2,005	31	21	2,079	2,026
Female	No. of employees	392	365	27	22	419	387
By employment typ	e						
Full time	No. of employees	2,440	2,370	58	43	2,498	2,413
Part time	No. of employees	0	0	0	0	0	0
By age group							
30 or below	No. of employees	313	311	2	2	315	313
31 to 50	No. of employees	1,850	1,805	35	24	1,885	1,829
Over 50	No. of employees	277	254	21	17	298	271

Year	Unit	Ste	el Cord Segm	ent		Offices			
		Shandong Province	Zhejiang Province	Henan Province	Hong Kong	Shanghai	Beijing	Others	Total
By s	staff hometown r	region							
2024	No. of employees	1,556	423	92	7	23	7	390	2,498
2023	No. of employees	1,492	428	91	8	17	7	370	2,413

1. The above table of the total workforce by staff hometown region of the two segments is showing the two segments' top three hometown regions that most of the employees live respectively.

The number and turnover rate of employees by gender, employment type, age group and hometown region of staff for the years ended 31 December 2024 and 2023 are as follows:

	Unit		teel Coro 24		ent )23	2(	Offi 024		023	20	To )24		)23
Number and rat turnover (%)		570	1.92	848	2.87	3	0.48	3	0.64	573	1.89	851	2.84
By gender													
Male	No. of employees and %	501	1.69	757	2.56	2	0.32	1	0.21	503	1.66	758	2.53
Female	No. of employees and %	69	0.23	91	0.31	1	0.16	2	0.43	70	0.23	93	0.31
By employmen	t type												
Full time	No. of employees and %	570	1.92	848	2.87	3	0.48	3	0.64	573	1.89	851	2.84
Part time	No. of employees and %	0	0.00	0	0.00	0	0.00	0	0.00	0	0	0	0.00
By age group													
30 or below	No. of employees and %	203	0.68	308	1.04	0	0.00	1	0.21	203	0.67	309	1.03
31 to 50	No. of employees and %	349	1.18	519	1.76	0	0.00	2	0.43	349	1.15	521	1.74
Over 50	No. of employees and %	18	0.06	21	0.07	3	0.48	0	0.00	21	0.07	21	0.07

Year	Unit	Shan	dong		Steel Coro jiang		nt 1uan				Ofi	ïces	
		Pro	vince	Pro	vince	Pro	vince	Ot	hers	Hon	g Kong	Be	ijing
By staff h	nometown region												
2024	No. of employees and %	384	1.29	32	0.11	23	0.08	131	0.44	2	0.3	1	0.18
Year	Unit	Shano	dong vince	Zhe	Steel Coro jiang vince	Sic	nt huan vince	Ot	hers			ïces Kong	
By staff h	nometown region												
2023	No.of employees and %	590	1.99	37	0.13	26	0.09	195	0.66		3	0	.64

#### Promotion of Employees' Work-life Balance

Striking a perfect work-life balance has always been a challenge for our employees. We believe that employees are more willing to work at the Company for a longer period of time when they feel more motivated and less stressed at work. Therefore, a higher employee retention rate, a lesser time-consuming training and a greater employees' loyalty towards the Company can be achieved.

#### **HEALTH AND SAFETY**

The Group treats its employees' health and safety as high priority, and we are committed to maintaining a safe, healthy and productive workplace for our employees. Thus, we provide orientation training, comprehensive and ongoing safety trainings to our employees of the main departments, in particular to those who worked at workshops and production lines of the Company and its principal business units/its subsidiaries, to help them adapt to the operation of the plant and machinery and production facilities.

In order to provide a safe and healthy working environment to our employees, the Group has formulated various production safety regulations, relevant workshop regulations and codes of conduct in workplace, which provide guidelines on handling personal injuries and operating equipment accidents in case of occurrence, handling dangerous chemicals and operating machines which are set out in the procedures on operation safety manual and safety codes in accordance with the Occupational Safety and Health Ordinance, Occupational Disease Prevention Law in the PRC (《中國職業病防治法》) and the Production Safety Law of the PRC (《中國安全生產法》).

We have adopted the codes of practice in safety operation for handling hazardous wastes and operating machines to strictly regulate employees who often handle hazardous wastes and operate machines. They have to take and/or wear full set occupational protective equipment provided by the Group, such as face shields, safety glasses/goggles, safety belts, protective clothing etc. when they are handling dangerous chemicals or operating machines to protect their health and safety. They should check if the operating machines or equipment are in order and safe before use. All the operating machines and equipment have been inspected regularly to ensure safety. We have also prepared a compilation of responsibilities on safety issues to regulate the duties of each of main department of the two steel cord plants in terms of planning, monitoring and reviewing of safety and health measures. Safety maintenance officers have been appointed by the two plants to implement, monitor and enforce the management of health and safety policies. Moreover, we have also formulated regulations in respect of maintenance of healthy and safe workplace for our employees.

Our two manufacturing plants in the PRC have implemented several working measures, especially strengthening the safety and 5S Management, which are known as "sort", "set in order", "shine", "standardise" and "self-discipline" so as to enable our employees to work at a safe and green working environment and production lines.

The Group has regulated that all new employees in the Mainland must take three levels of production safety trainings before taking up their duties, i.e., departmental trainings, workshop trainings and class/team work lines trainings. Employees who have special job duties, such as handling of dangerous chemicals, electricians, fitters, welders, forklift operators etc., must follow the operation safety rules. For employees who change job positions, must also re-take relevant safety trainings before serving. We also provide trainings to Hong Kong and PRC employees, aiming to deliver a message of the importance of occupational health and safety in Hong Kong and PRC offices.

In addition, a reporting channel has been established for work injuries and work-related fatalities. In the event of any work injury or work-related fatality, the managers of the main business units of the Company and its subsidiaries must report to the manager of human resources and administration department immediately. We have also adopted an internal key performance indicator defining a tolerance level for occupational injuries and work-related fatalities in main business units of the subsidiaries. When no occupational injury or serious occupational accident has occurred, or the occurrence rate is below the tolerance level, the responsible person of the management will be awarded. We believe that such measures can reduce the occurrence of work injuries.

#### Occupational Health and Safety Management System Authentication

JESC and TESC obtained the ISO45001:2018 Occupational Health and Safety Management System Authentication Certificates since October 2014 and January 2016, which are reviewed by Jiangsu Jiuzhou Certification Co.,Ltd. and Shanghai NQA Certification Co., Ltd. respectively in 2023 and 2024. The respective latest certificates are valid till October 2026 and January 2028.

#### Work Safety Management System Authentication

JESC and TESC obtained the Work Safety Standardisation Certificates issued by the Emergency Management Agency of Jiaxing (嘉興市應急管理局) and Zaozhuang Emergency Management Bureau (棗莊市應急管理局) since December 2022 and May 2021 respectively. The respective certificates are valid till December 2025 and May 2024.

Number and Rate of Work-related Fatalities in the past three years and Lost Days due to Work Injury Under the Employees' Compensation Ordinance, the Company must possess a valid employees' compensation insurance policy to cover its legal liabilities under both the ordinance and common law for work injuries in Hong Kong. All employees working in the PRC are protected from work injuries and work-related diseases subject to China's social security system. If an employee has suffered from work-related injury, fatality or disease in his/her course of employment, we must report to the Labour Department in Hong Kong or Ministry of Human Resources and Social Security of the PRC in writing within the period stipulated by the Occupational Safety and Health Ordinance, Regulation on Work-Related Injury Insurances (《工傷保險條例》) of the PRC and The State Council of the PRC, as the case may be.

Neither any serious accidents in relation to occupational health and safety nor work-related fatalities had occurred in connection to the Group in the past three years including the reporting year.

The related data of occupational injury of the Group for the years 2024 and 2023 are as follows:

	Unit	2024	2023
No. of working days lost due to employee's			
occupational injury <sup>(1)</sup>	Days	31	597

1. The significant decrease in the number of working days lost due to employee's occupational injury was mainly attributable to the fact that the Group attaches great importance to work safety. A number of measures were taken in 2024, including improvement of safety facilities, elimination of potential safety hazards, enhancement of production safety management and promotion of employees' safety awareness, which effectively reduced the incidence and severity of work-related injuries.

#### Compensation for Work Injuries

The Group complies with the laws, rules and regulations in relation to compensation for work injuries or occupational diseases in Hong Kong and the PRC, which include the Employees' Compensation Ordinance, Compensation Standard for Work Injury (《工傷賠償標準》), Regulation on Work-Related Injury Insurances (《工傷保險條例》), Social Insurance Law of the PRC (《中國社會保險法》) and Regulation on Work-Related Injury Insurance in Zhejiang Province (《浙江省工傷保險條例》) to pay compensation to employee who has suffered from work-related injuries or work-related diseases. The Group also considers to pay extra compensation more than statutorily required to those employees who are injured, dead or suffered from work-related diseases in their course of employment.

#### **DEVELOPMENT AND TRAINING**

The Group aims to ensure the continuous development and training of all employees, and is committed to providing continuous development training programmes/courses to the Mainland employees, Directors and employees of the Company to enhance their production and management skills, as well as professional skills and knowledge. Therefore, the Group has adopted training course management policies for employees at different levels of the Group, including managerial grade or above, general staff and production workers, to provide them with a training framework for internal and external training programmes/courses. Each business segment is responsible for developing its own training programmes/courses to meet its specific business requirements. These training programmes/courses offered to employees include orientation training, on-the-job training, safety education, on-site training, simulative practice, vocational training, talk/lecture, quality management, job relocation training and external training related to professional qualifications. Through orientation training, new employees can have a fast understanding of the company, identify the organisational culture of the company and can easily adapt to it. Employees who fail the orientation training after the probation period stipulated in their employment contract and employees' handbook of their companies may result in disqualification as permanent employees with those companies. Any employee who has attended onthe-job training must take examinations to assess employee's performance.

During the year ended 31 December 2024, the Directors have attended programmes or seminar(s) organised by the Company, other qualified professional bodies or regulatory authorities. In particular, all Directors had actively participated in the anti-corruption training as required under the ESG Reporting Guide.

The Group encourages employees to pursue lifelong learning and training. Therefore, we offer comprehensive benefits, such as examination leaves, for those employees who will attend examinations organised by professional bodies or academic institutions in relation to the job he/she performs. All in all, the Group provides all-round and comprehensive trainings to employees enhancing their technical skills and knowledge continuously.

# The Percentage of Employees Trained and Average Training Hours Completed per Employee by Gender and Employee Category

For the years ended 31 December 2024 and 2023, the respective percentage of employees trained and average training hours completed per employee by gender and employee category are as follows:

	Unit	Steel Cor	d Segment	Offi	ces
		2024	2023	2024	2023
Percentage of employees trained	%	54.57	98.71	6.29	6.89
Percentage of employees who received training by gender					
(a) Male	%	44.81	80.72	3.48	1.89
(b) Female	%	9.76	17.99	2.81	5.00
Percentage of employees who received training by employee category					
(i) Directors and/Senior Management	%	N/A	N/A	1.16	0.82
(ii) Managerial grade or above	%	0.13	0.09	1.89	0.85
(iii) Production workers	%	51.80	95.05	N/A	N/A
(iv) Supporting/General Staff	%	2.52	3.48	2.39	2.73
(v) Others	%	0.12	0.09	0.85	2.49
Average hours of training per employee by gender					
(a) Male	Hours	2.98	4.64	1.20	0.01
(b) Female	Hours	3.51	5.85	0.40	0.52
Average hours of training per employee by employee category					
(i) Directors and/Senior Management	Hours	N/A	N/A	0.31	0.21
(ii) Managerial grade or above	Hours	1.72	1.80	1.27	0.03
(iii) Production workers	Hours	3.38	5.29	N/A	N/A
(iv) Supporting/General Staff	Hours	1.03	1.93	2.28	1.15
(v) Others	Hours	0.12	0.17	0.34	0.48
Total training hours completed by employees Average hours of training per employee	Hours Hours	89,569.60 3.06	141,354.00 4.81	742.00 1.59	283.50 0.59
(v) Others Total training hours completed by					

#### LABOUR STANDARDS

The Group has formulated a comprehensive set of human resources policies to recruit talented persons from the widest pool of available talent in a fair and equitable manner, including but not limited to stipulating rules on recruitment and also formulated a strict recruitment policy to prevent child and forced labour, and other potential illegal incidents.

#### Management Systems for Recruitment

The Group aims to recruit and retain the best employees to help achieve its business objectives, missions and visions by implementing recruitment management systems strictly. The Group has taken all practical steps to ensure that the job applicants are legally employed in accordance with the Provisions on the Prohibition of Child Labour of the PRC (《中國禁止使用童工規定》) and relevant laws and regulations in Hong Kong and the PRC and request new applicants truthfully fill in their personal information in the personal data form, and provide identification documents and/or working visa (if any) to human resources and administration department in a fair and equitable manner and also under legitimate procedures. Those procedures include but not limited to verification of identity to prevent the Group from recruiting employees under the age of 16 and forced labour. In addition, we ensure that applicants and employees are treated equally in respect of recruitment, assignment, development, evaluation and reward.

#### Prevention of Child Labour and Forced Labour

Pursuant to the Provisions on the Prohibition of Child Labour of the PRC (《中國禁止使用童工規 定》) and the Law of the PRC on the Protection of Minors (《中國未成年人保護法》), the Group is prohibited to recruit employees under the age of 16 and forced labour. In this regard, we have formulated regulations on managing the prevention of child labour and forced labour, and established procedures for handling incidents with necessary actions taken to transport back those labour to hometown or place of origin if any child labour/forced labour is found. Disciplinary actions including the possibility of summary dismissal will be taken against employees deliberately providing untrue personal data, forged certificates or violating such regulations subject to the concerned company's employees' handbook and policies. Those regulations are in compliance with the Employment Ordinance and relevant laws and regulations in the PRC.

All in all, the Group shall review the overall recruitment practices from time to time to prevent child labour, forced labour and other potential illegal incidents and shall comply with any laws, rules and regulations to prohibit child labour and forced labour. During the year of 2024, the Group was not aware of any breach of or non-compliance with applicable laws and regulations in relation to child labour and forced labour.

### SUPPLY CHAIN MANAGEMENT

#### **Our customers and suppliers**

The Group has maintained strong business relationships with its suppliers over the years, owing to their consistent supply of stable and high-quality raw materials to the Group. The suppliers mainly supply steel wire rods for manufacturing of steel cords for radial tyres, which are used in steel cord segment.

We are dedicated to delivering high-quality and superior steel cords, sawing wire and hose wire products to our customers (i.e., tyre manufacturers). Quality control is a cornerstone of our supply chain management, and the steel cord segment will carefully select raw material suppliers known for their quality assurance, good reputation, high credibility and integrity, which will allow us to build long-term business relationships with. Additionally, we implement a rigorous procurement management mechanism and screening system to select our raw materials suppliers based on various criteria such as price, exclusivity, transportation convenience, financial condition, quality, techniques and skills, reputation, after-sale services, social responsibility etc..

Furthermore, we regularly assess the current suppliers, focusing on key evaluation criteria such as the consistent quality of raw materials, costs, service, delivery, customer feedback, and so on. We adhere to a series of established standard procedures for selecting and evaluating samples of raw materials, i.e., wire rods, to ensure they meet the quality requirements of international standards, such as ISO9001:2015. We also monitor the changes in information of customers and suppliers through well-established procedures to minimise potential business risks associated with changes in owners/beneficiaries of our customers and suppliers. so that our records of customers and suppliers remain accurate and reliable.

#### Number of Suppliers by Geographical Region

The number of suppliers by geographical region of steel cord segment for the years 2024 and 2023 are as follows:

	2024	2023
PRC		
Jiangsu	7	8
Others	6	6
Subtotal	13	14
Japan	0	1
Total	13	15

Practices relating to Engaging Suppliers, Number of Suppliers where the Practices are being Implemented, and the Execution and Monitoring of those Practices

For the steel cord segment, its purchasing department has formulated a serial of supplier management procedures to rigorously monitor the quality of raw materials and regularly review the rating of those suppliers. Our aim is to select suppliers capable of delivering high-quality raw materials and superior service. To ensure that our key suppliers meet our quality standards, we have established a product quality assurance cooperation agreement. We believe that this practice can foster mutual trust between the suppliers and the Group, benefiting both parties and safeguarding their interests.

The above practices applied to all suppliers in respect of provision of raw materials for steel cord segment during the years of 2024 and 2023.

Additionally, we have established a green procurement policy to encourage employees to make bulk purchases, thereby minimising resource consumption related to transportation. This policy prioritises the purchase of environmentally friendly office supplies and equipment etc..

We urge our suppliers to align with the Group's standards, comply with all applicable laws and regulations, and actively work to minimise the adverse environmental impacts while conserving our natural resources. For instance, one of our suppliers, Nanjing Iron & Steel Co., Ltd., supplies us with products that adhere to its environmental policies and guidelines, as well as our requirements.

Our suppliers also have expectations on us, including profitability, level of compliance with laws and regulations, effectiveness of supply chain management, accountability, integrity and reliability, willingness to communicate, degree of integrity in co-operation and length of partnership.

We aim to be the preferred customers of our targeted suppliers. Their loyalty, support, and collaboration enhance our operational efficiency, allow us to source raw materials more sustainably, and ultimately strengthen the value of our supply chain.

# Practices used to identify Environmental and Social Risks along the Supply Chain, and the Execution and Monitoring of those Practices

As a first step in achieving our sustainable development goals, we have established a new sustainable development procurement policy, which details the procedures and practices for integrating environmental and social considerations into the procurement process as well as evaluating the associated risks.

Particularly, the Group evaluates the environmental and social risks linked to its suppliers. Qualification requirements, such as environmental assessment reports and pollutant discharge permits, are outlined as mandatory qualifications (if appropriate). Additionally, industry-related requirements, like environmental system certifications, work safety permits, are listed as supporting qualifications (if appropriate). We also keep track of changes in suppliers' information to minimise potential risks.

# Practices used to promote Environmentally Preferable Products and Services when Selecting Suppliers, and the Execution and Monitoring of those Practices

The Group supports the purchases of environmentally friendly products to reduce the environmental impact of our business operations. Consequently, the suppliers' responsibility for environmental protection and society are also our concerns in supply chain management.

On one hand, the Group diligently chooses suppliers who emphasise on environmental protection and respect the rights of employees, for instance, one of our suppliers, Nanjing Iron & Steel Co., Ltd., has its production philosophy in delivering an environmentally friendly and safe working environment to its employees. On the other hand, the Group collaborates closely with suppliers and continues to maintain good relationships with them to ensure better procurement, maintain the quality of products and services, and meet our production requirements.

Besides, we try to procure locally or nearby rather than overseas so as to reduce air and GHG emissions as well as energy consumption caused by transportation and shipping, hence the majority of our steel cord segment's suppliers are located in Jiangsu.

### **PRODUCT RESPONSIBILITY**

To become a qualified supplier for new radial tyre customers, we must undergo rigorous testing procedures. For most international radial tyre manufacturers, these tests could take approximately two years to evaluate the performance of steel cord in various weather conditions. In this context, the Group places significant importance on delivering high-quality products that meet stringent safety standards, aiming to uphold our "Eastern" brand recognition in steel cord industry. We constantly monitor the quality of steel cords of different specifications to ensure that radial tyre manufacturers are satisfied with our products, and their requirements for production of safe radial tyres can be met. By adhering to these standards, we can gain their long-term support and trust, thereby enhancing the Group's profitability.

In order to maintain customers' confidence in our product quality, the Group offers after-sale services to our customers. If we receive any complaint from a customer, we will first engage with that customer and arrange for our technical personnel to visit that customer's site for follow up or fine tune our product parameters (as the case may be). For example, if we determine that the complaint stems from the customer's dissatisfaction with the current production process, we will improve the production process based on customers' needs, and customers may return or exchange products in accordance with the terms and conditions of the contracts. Additionally, if we discover that operators have violated rules or failed to follow operational procedures, our management will issue warnings and provide further training to ensure compliance.

IATF 16949:2016 certificates were issued by TÜV Rheinland Cert GmbH, a leading international provider of inspection services, to TESC and JESC in 2018 and 2019 respectively proving the manufacturing of steel cords met the requirements of IATF standard. The respective certificates are valid till December 2026. ISO45001:2018 Occupational Health and Safety Management System certificates were issued to TESC and JESC in January 2016 and October 2014, and are valid until January 2028 and October 2026 respectively. Those certificates are intended to establish or reinforce the confidence of a customer towards the system and process quality control of a supplier, particularly related to the development, production and use and service of automotive-related products.

JESC and TESC obtained a silver and bronze medal of EcoVadis sustainability rating for year 2024 respectively, which fully affirms the Group's efforts and achievements in promoting sustainable development and meeting customers' expectations. EcoVadis ratings measure corporate social responsibility performance in four key areas: Environment, Labor & Human Rights, Ethics, and Sustainable Procurement. We will remain committed to participating and will strive for improved results year-on-year.

Pre-product quality control planning procedures and sales of products policies and procedures are in place for steel cord segment, in which the area of those procedures and policies covers sales return policy, customers' complaint procedures and intellectual property policies and measures related to maintenance and safeguard products. In addition, this segment also conducts customers' satisfaction surveys every year to collect customers' opinions on our product quality, delivery efficiency and after-sale service. The sales representatives of steel cord segment visit the customers occasionally to obtain comments/opinions, thereby improving the quality of our products and advancing our technical skills and knowledge in order to meet the customers' requirements.

We understand the importance of intellectual property rights protection and have developed some guidelines for identifying intellectual property rights and applying for registration. Intellectual properties are important assets towards our Company, so we strive to safeguard the rights and interests of intellectual properties. As the owner of certain intellectual property rights, we have adopted product standard management procedures to protect customers' information from unauthorised access, use and disclosure, and to preserve their data properly.

There was no issue regarding material non-compliance with the relevant laws and regulations that have any significant impact on the Group relating to health and safety, advertising, labelling and privacy matters during the year.

There were no products of the Group sold or shipped subject to recalls for safety and health reasons in 2024 and 2023.

#### Number of Products and Service Related Complaints Received and How to Deal With

As mentioned under the heading of "**PRODUCT RESPONSIBILITY**" above, when customer complaints are received, we will first communicate with our customer and arrange for our technical personnel to visit the customer's site for follow up or fine tune our product parameters (as the case may be). After that, they will optimise the performance of products to suit the requirements of their customers (if necessary). Any corrective actions will then be recorded in the corrective action report and will follow up if any corresponding actions are required. Moreover, the disqualified products can be returned or exchanged subject to the terms and conditions of the sales contracts. The complaint rate of steel cord segment for the years 2024 and 2023 are as follows:

		Steel Cord Segment
	Unit	<b>2024</b> 2023
Total number of products related complaints received per thousand tonnes of	No. of complaints/	
production volume	'000 tonnes	<b>0.16</b> 0.20

### **ANTI-CORRUPTION**

#### **Standard of Conduct**

The establishment of good corporate governance standards is essential to the success of our business development, as this can promote and reinforce the confidence of our stakeholders. We have devised and adopted several clear guidelines/policies for the Directors, management and employees of the Group which enable the Group to achieve a high standard of code of conduct, including the following:

- Declaration of Conflict of Interest
- Guidelines on Accepting and Offering Gifts and Entertainment
- Whistleblowing Policy
- Key Channels of Compliant
- Reporting and Monitoring Policy on Connected Transactions and Continuing Connected Transactions

All the above policies/guidelines are annexed to the Internal Management and Control Manual ("Internal Control Manual") of the Company which will be reviewed and updated on a regular basis. The latest Internal Control Manual has been revised and adopted on 29 December 2023. Besides, all employees of the Group, including directors of the Company, should avoid conflict of interest between their private interests and the interests of the Company and should report in such cases. They must also follow the guidelines in relation to provision of gifts and entertainment and accepting gifts and benefits, and observe any updates and changes regarding the anti-corruption measures.

In addition, a whistleblowing policy and system have been implemented and set up since 22 March 2012 and revised from time to time thereafter to provide procedures to employees who have concerns about any suspected misconduct or malpractice within the Group, in which those employees can reflect those concerns or submit a written report to the Company through this policy. The Company will then evaluate the report to decide whether a full investigation is needed. If it is necessary, the investigation process will start and the Company will prepare an investigation report and then submit it to the audit committee of the Company upon completion of the investigation. The audit committee of the Company is responsible for monitoring and reviewing the operation of the whistleblowing policy and providing any recommendations attributable from the investigation of complaints.

We have also formulated policies/guidelines on anti-corruption and codes of conduct for respective core business units in the Mainland, namely Guidelines on Corporate Corruption Prevention, Management of Regulations on Anti-corruption and Anti-bribery, Whistleblowing Policy, Code of Conduct and Code of Ethics relating to fraud, bribery and extortion.

During the reporting period, the Company provided Directors and employees with training materials designed to strengthen their understanding of and compliance with all the applicable anti-corruption laws and regulations.

Also, we have engaged Moore Advisory Services Limited, the internal auditor of the Company, to review the abovementioned policies to avoid any misappropriates, suspected or alleged fraud, abuse of power etc. and to ensure that all employees comply with the code of conduct.

As for suppliers, we have a stringent procurement management system to assess our suppliers' performance and conduct in order to enhance the suppliers' commitment to the Group's standards and principles.

Moreover, the audit committee members of the Company have responded to PricewaterhouseCoopers, the external auditor of the Company, about their knowledge on any actual, suspected or alleged fraud which may affect the Group. During the year, the internal auditor, among others, has reviewed the risk management and internal control systems to see if any additional precaution needed to be added.

All the business operations have complied with relevant laws and regulations that may have a significant impact on the Group relating to bribery, extortion, fraud and money laundering etc. in the PRC and Hong Kong.

During the year, we were not aware of any legal cases regarding corrupt practices brought against the Company or its employees.

#### **COMMUNITY INVESTMENT**

The Group incorporates community care into our corporate values and aims to make a positive impact on the communities where we operate. We proactively engage in environmental initiatives and actively support social welfare activities and community care projects through donations. Our objectives are: (i) to raise environmental awareness within the Group; (ii) to promote occupational safety and health in the workplace; and (iii) to provide support to those in need within society.

To enhance employees' awareness of environmental protection and occupational safety and health, as well as to encourage their contributions to society, we have implemented Corporate Social Responsibility Guidelines, Social Welfare Activities, and Philanthropy Management Guidelines. These initiatives motivate all employees to participate in community events, create a safe and healthy working environment, comply with applicable laws and regulations, and commit to environmental protection. We believe and expect that every employee has the potential to contribute positively to their local community.

We are a member of the "Jockey Club CarbonCare Open Innovation Lab" ("COIL") since 2015, which is established by CarbonCare Inn Lab and contributed by the Hong Kong Jockey Club Charities Trust. COIL holds events and/or seminars, invites a number of low-carbon experts specialised in different areas or the management of companies/organisations to provide information on low-carbon and share their experiences in reducing carbon emissions. The events and seminars held and information provided by COIL on climate justice, carbon reduction, resource conservation and adaptation to future climate scenarios are particularly useful, and the knowledge obtained does help us to devise relevant measures and policies on carbon reduction properly and effectively.

In efforts to promote a green culture at our workplace, we have actively participated in GOALS and Eco-Healthy Workplace organised by the WGO since 2017. These programs require companies to adopt various green practices in their offices based on WGO guidelines, with the assistance of Green Auditors. Through this journey to achieve the goals, we have gained knowledge and skills on environmental protection and sustainability, raised employees' awareness on healthy workplace, and assessed and improved our environmental footprint by identifying and applying reduction measures, in respect of energy, water, paper consumption and carbon at the office. As we have implemented green workplace practices far more than the minimum requirement, we had been awarded WGO's GOALS label and Eco-Healthy Workplace label for a year on 26 July 2024, recognising our achievement in promoting green office and commitment to sustainable development. In order to share our success in sustainability, we continue to encourage our subsidiaries to take actions and implement green measures in their office area and work stations. Our colleagues in the Mainland have embraced the "green office" concept at their workplace, placing labels next to light switches to remind them of the importance of saving electricity and providing waste separation bins for recycling.



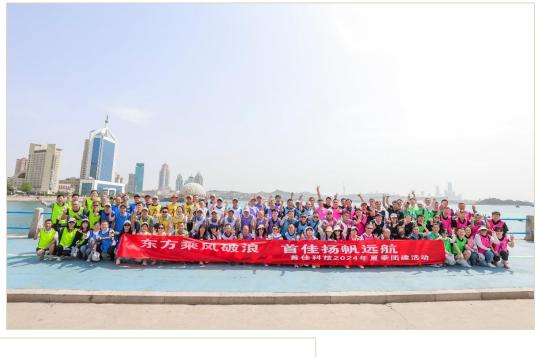
During the year, the Company participated in the "Paper Saving" campaign orgainsed by WGO, supported the Hong Kong Green Building Week 2024 ("HKGBW 2024") organised by Construction Industry Council and the Hong Kong Green Building Council, and took part in the Biz-Green Dress Day of HKGBW 2024. These activities encourage employees to take concrete steps toward energy conservation, and to adopt a more sustainable lifestyle in the workplace.

In addition to embracing green initiatives at the Offices, the Company also actively to support the communities through charitable activities and donations. We participated in the "2024 Dress Casual Day" organised by the Community Chest, which is one of the most important charities in Hong Kong, and donated a certain amount of benevolent donation. Employees were encouraged to wear their favourite casual outfits to work in support of a meaningful cause, and it has received full backing from the Directors, the management and the employees of the Company. Through this initiative, we aim to inspire our team to show love and care for those around us. After the reporting date, we also made donations to the "Services for Street Sleepers, Residents in Cage Home and Cubicles" by supporting another event called "Skip Lunch Day 2025" launched by the Community Chest.





On the other hand, we have arranged a variety of recreational activities outside of work to motivate employees, strengthen team spirit, and enhance their sense of belonging. During the year, the Company along with its PRC subsidiaries organised a summer team-building event in Qingdao that features hiking and sightseeing, as well as team outings to Nanhu Lake in Jiaxing. Besides, TESC, a PRC subsidiary of the Company, hosted various sports events such as basketball, table tennis, tug of war etc. and fun sports day. Through these events, employees are encouraged to bond, collaborate, and enjoy a healthy work-life balance, fostering a more cohesive and motivated workforce.





Furthermore, the Company was acknowledged by Mandatory Provident Fund Schemes Authority as "Good MPF Employee Award 5 Years+" for the year 2023/24 in recognition of the Company's ongoing commitment to protecting and enhancing the retirement needs of our employees.

The Group recognises that corporate social responsibility is crucial for the long-term success of our business. Our current community involvement is just the beginning of our commitment to business sustainability. We are dedicated to encouraging employee participation in a broader array of community-based activities, including social welfare initiatives and community care projects to support our local communities. Moving forward, we will allocate resources and seek additional opportunities to give back to society with a proactive approach.



General Disclosure		Refer to the page(s) no. of this 2024
and KPIs	Description	ESG Report
Aspect A1: Emissio	ns	
General Disclosure	Information on:	14-19
	(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.	
KPI A1.1	The types of emissions and respective emissions	19-21
	data.	
KPI A1.2	Direct (Scope 1) and energy indirect (Scope 2)	21
	greenhouse gas emissions and intensity.	
KPI A1.3	Total hazardous waste produced and intensity.	21-22
KPI A1.4	Total non-hazardous waste produced and	23-24
	intensity.	
KPI A1.5	Description of emissions target(s) set and steps	24-25
	taken to achieve them.	
KPI A1.6	Description of how hazardous and non-hazardous	25-26
	wastes are handled, reduction target(s) set and	
	steps taken to achieve them.	

General Disclosure		Refer to the page(s) no. of this 2024
and KPIs	Description	ESG Report
Aspect A2: Use of R	Resources	
General Disclosure	Policies on the efficient use of resources,	27
	including energy, water and other raw materials.	
KPI A2.1	Direct and/or indirect energy consumption by type	27-28
	in total and intensity.	
KPI A2.2	Water consumption in total and intensity.	28
KPI A2.3	Description of energy use efficiency target(s) set	28-30
	and steps taken to achieve them.	
KPI A2.4	Description of whether there is any issue in	28-30
	sourcing water, water efficiency target(s) set and	
	steps taken to achieve them.	
KPI A2.5	Total packaging material used for finished	30-31
	products and, if applicable, with reference to per	
	unit produced.	

Aspect A3: The Environment and Natural Resources							
General Disclosure	Policies on minimising the issuer's significant	32-35					
	impacts on the environment and natural resources.						
KPI A3.1	Description of the significant impacts of activities	32-35					
	on the environment and natural resources and the						
	actions taken to manage them.						

General Disclosure and KPIs	Description	Refer to the page(s) no. of this 2024 ESG Report
Aspect A4: Climate	Change	
General Disclosure	<ul><li>Policies on identification and mitigation of significant climate-related issues which have impacted, and those which may impact, the issuer.</li></ul>	36-38
KPI 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.	36-38
Aspect B1: Employ	ment	
General	Information on:	39-44
Disclosure	<ul> <li>(a) the policies; and</li> <li>(b) compliance with relevant laws and regulations that have a significant impact on the issuer</li> <li>relating to compensation and dismissal, recruitment and promotion, working hours, rest periods, equal opportunity, diversity, anti-discrimination, and other benefits and welfare.</li> </ul>	
KPI B1.1	Total workforce by gender, employment type (for example, full- or part-time), age group and geographical region.	44-45
KPI B1.2	Employee turnover rate by gender, age group and geographical region.	45-46

General Disclosure		Refer to the page(s) no. of this 2024
and KPIs	Description	ESG Report
Aspect B2: Health a	and Safety	
General Disclosure	<ul> <li>Information on:</li> <li>(a) the policies; and</li> <li>(b) compliance with relevant laws and regulations that have a significant impact on the issuer</li> <li>relating to providing a safe working environment and protecting employees from occupational hazards.</li> </ul>	47-49
KPI B2.1	Number and rate of work-related fatalities occurred in each of the past three years including the reporting year.	49
KPI B2.2	Lost days due to work injury.	49
KPI B2.3	Description of occupational health and safety measures adopted, and how they are implemented and monitored.	47-49

Aspect B3: Development and Training		
General Disclosure	Policies on improving employees' knowledge and skills for discharging duties at work. Description of training activities.	50
KPI B3.1	The percentage of employees trained by gender and employee category.	51
KPI B3.2	The average training hours completed per employee by gender and employee category.	51

		<b>Refer to the page</b> (s)
General Disclosure	e	no. of this 2024
and KPIs	Description	ESG Report

Aspect B4: Labour Standards				
General	Information on:	52-53		
Disclosure	<ul> <li>(a) the policies; and</li> <li>(b) compliance with relevant laws and regulations that have a significant impact on the issuer</li> <li>relating to preventing child and forced labour.</li> </ul>			
KPI B4.1	Description of measures to review employment practices to avoid child and forced labour.	52-53		
KPI B4.2	Description of steps taken to eliminate such practices when discovered.	52-53		

Aspect B5: Supply Chain Management			
General Disclosure	Policies on managing environmental and social risks of the supply chain.	54	
KPI B5.1	Number of suppliers by geographical region.	55	
KPI B5.2	Description of practices relating to engaging suppliers, number of suppliers where the practices are being implemented, and how they are implemented and monitored.	55-56	
KPI B5.3	Description of practices used to identify environmental and social risks along the supply chain, and how they are implemented and monitored.	56	
KPI B5.4	Description of practices used to promote environmentally preferable products and services when selecting suppliers, and how they are implemented and monitored.	56-57	

and KPIsDescriptionESG ReportAspect B6: Product ResponsibilityInformation 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.58-59KPI B6.1Percentage of total products sold or shipped subject to recalls for safety and health reasons.59KPI B6.2Number of products and service related complaints received and how they are dealt with.60KPI B6.3Description of quality assurance process and recall procedures.59KPI B6.4Description of consumer data protection and59	General Disclosure		Refer to the page(s) no. of this 2024
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1 1		recall procedures.	
	KPI B6.5	Description of consumer data protection and	59
privacy policies, and how they are implemented		privacy policies, and how they are implemented	
and monitored.		and monitored.	

		<b>Refer to the page</b> (s)
General Disclo	osure	no. of this 2024
and KPIs	Description	ESG Report

Aspect B7: Anti-corruption				
General Disclosure	Information on:	61-62		
	(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.			
KPI B7.1	Number of concluded legal cases regarding	62		
	corrupt practices brought against the issuer or its			
	employees during the reporting period and the			
	outcomes of the cases.			
KPI B7.2	Description of preventive measures and	61-62		
	whistleblowing procedures, and how they are			
	implemented and monitored.			
KPI B7.3	Description of anti-corruption training provided	62		
	to directors and staff.			

Aspect B8: Community Investment			
General Disclosure	Policies on community engagement to understand 63-67		
	the needs of the communities where the issuer		
	operates and to ensure its activities take into		
	consideration communities' interests.		
KPI B8.1	Focus areas of contribution.	63-67	
KPI B8.2	Resources contributed to the focus areas.	63-67	





SHOUGANG CENTURY HOLDINGS LIMITED 首佳科技製造有限公司

股份代號 Stock Code : 103