



**HARBOUR DIGITAL**

**Harbour Digital Asset Capital Limited**  
**港灣數字產業資本有限公司**

*(formerly known as Unity Investments Holdings Limited 合一投資控股有限公司)*

*(前稱 Unity Investments Holdings Limited 合一投資控股有限公司)*

*(Incorporated in the Cayman Islands with limited liability)*

*(於開曼群島註冊成立的有限公司)*

**(Stock code 股份代號：913)**

ENVIRONMENTAL, SOCIAL  
AND GOVERNANCE REPORT  
環境、社會及管治報告

2021

# Environmental, Social and Governance Report

## 環境、社會及管治報告

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### ABOUT THE GROUP

Harbour Digital Asset Capital Limited (formerly “Unity Investments Holdings Limited”, the “Company”, and its subsidiaries collectively referred to as the “Group”) is an investment company incorporated in the Cayman Islands whose shares are listed on The Stock Exchange of Hong Kong Limited under Chapter 21 of the Listing Rules since 27 October 1999 and investing in securities constitutes its ordinary course of business.

The principal activities of the Group are to invest in both listed and unlisted companies. The Group’s current core portfolio comprises of mainly small to medium sized listed companies with good asset backing and/or growth potential. The Group’s portfolio covers a wide array of industries and sectors including, but not limited to, companies engaged in sectors, such as finance, consumer goods and services, media, construction, mining, etc.

### ABOUT THE REPORT

The Group is pleased to present its Environmental, Social and Governance (“ESG”) Report (the “ESG Report”) for the year ended 31 December 2021. This ESG report describes the sustainable development performances, approaches and measures implemented by the Group.

The information disclosed in this report covers the financial year ended 31 December 2021 (the “Year”) unless otherwise stated. Compared with last year, there is no change in the reporting scope, which includes all our operations in Hong Kong.

### 關於本集團

港灣數字產業資本有限公司(前稱「合一投資控股有限公司」、「本公司」及其附屬公司統稱「本集團」)為一家於開曼群島註冊成立的投資公司，其股份根據上市規則第21章自一九九九年十月二十七日起於香港聯合交易所有限公司上市，投資證券構成其日常業務。

本集團的主要業務為投資上市及非上市公司。本集團目前的核心投資組合主要包括具有良好資產支持及／或增長潛力的中小型上市公司。本集團的投資組合涵蓋廣泛的行業及領域，其中包括(但不限於)從事金融業、消費產品及服務業、媒體、建築及採礦業的公司。

### 關於本報告

本集團欣然呈列其截至二零二一年十二月三十一日止年度的環境、社會及管治(「ESG」)報告(「ESG報告」)。本ESG報告描述本集團的可持續發展表現、方法及實施的措施。

除另有訂明者外，本報告所披露的資料涵蓋截至二零二一年十二月三十一日止財政年度(「本年度」)。與去年相比，報告範圍並無變動，涵蓋我們在香港的所有業務。

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This ESG report has been prepared according to the Environmental, Social and Governance Reporting Guide, which is the Appendix 27 of the Rules Governing the Listing of Securities on The Stock Exchange of Hong Kong Limited. We followed the four reporting principles, namely materiality, quantitative, balance and consistency, throughout the preparation of this report.

Further information about our policies and measures in corporate governance is available in the “Corporate Governance Report” section in our Annual Report. We actively listen to opinions in order to provide stakeholders with a quality report with useful information. We highly appreciate feedback, including comments on this ESG Report or suggestions about our sustainability strategy. Your feedback is valuable for the Group’s continuous improvement. Please feel free to offer your comments and suggestions via email at [investors@hdca913.com](mailto:investors@hdca913.com).

### SUSTAINABILITY GOVERNANCE

The Group acknowledges that sustainability is a significant factor for our growth in the long term. We have been dedicated to being a corporate citizen with a sense of social responsibility and considering sustainability during the decision-making process and daily operation.

The Board of Directors (the “Board”) is responsible for our ESG strategy and reporting, including evaluating and determining our ESG-related risks and ensuring that appropriate and effective ESG risk management and internal control systems are in place. The management of the Company executes the ESG strategies and practices determined by the Board, as well as directly monitors ESG-related risks and internal controls. Material ESG issues will be discussed and reviewed during the Board meetings and the compilation of the ESG Report. Specific reduction targets may also be set if the environmental issues are material to the Group’s operation.

本ESG報告乃根據香港聯合交易所有限公司證券上市規則附錄二十七環境、社會及管治報告指引編製。於編製本報告的整個過程中，我們遵循四個報告原則，即重要性、量化、平衡及一致性。

有關企業管治政策及措施的進一步資料可於年報「企業管治報告」一節查閱。我們積極傾聽意見，為持份者提供優質報告，並提供有用的信息。我們非常感謝閣下的反饋意見，包括對本ESG報告的意見或有關我們可持續發展策略的建議。閣下的反饋對本集團的持續改善相當寶貴。閣下如有任何意見及建議，歡迎電郵至 [investors@hdca913.com](mailto:investors@hdca913.com)。

### 可持續發展管治

本集團認識到可持續發展為我們長期增長的重要因素。我們一直致力於成為具有社會責任感的企業公民，並將可持續發展納入決策程序及日常運營的考慮因素。

董事會（「董事會」）負責我們的ESG策略及報告，包括評估及釐定與ESG相關的風險，並確保已制定適當及有效的ESG風險管理及內部控制系統。本公司管理層執行董事會釐定的ESG策略及常規，並直接監控與ESG相關的風險及內部控制。重大ESG議題將在董事會會議及編製ESG報告過程中進行討論及審查。倘環境議題對本集團的經營屬重大，亦可設定具體的減排目標。

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With the assistance of an Internal Control Advisor, the Audit Committee periodically reviews and assesses our internal control system to maintain the effectiveness of its functions. The continuous monitoring and improvement of risk management and internal control system can enhance our sustainability.

### RESPONSIBILITY TO OUR STAKEHOLDERS

The Group is devoted to engaging our stakeholders and continually enhancing our ability in creating values for them. We identify key stakeholders according to our business and operation characteristics. We listen and respond to their reasonable concerns through various means of communication, including but not limited to the annual general meeting and other regular shareholder meetings, the official website, emails, publications such as annual report, interim report and other announcements and notices, etc. We also treasure the opinions of our valuable employees. Employees can communicate with management and provide their feedback directly and transparently. We consider that views from different stakeholders enable us in refining our strategies and setting the pace in the pursuit of sustainability.

The Group is committed to investing in quality assets and acting in the best long-term interests of our shareholders. We recognize the value of making sustainable returns in the long run. The Board is responsible for approving all investment/divestment decisions and formulating the Group's overall investment strategies and guidelines in accordance with the investment objective and policies of the Group.

在內部控制顧問的協助下，審計委員會定期檢討及評估我們的內部控制系統，以維持其職能的有效性。持續監督及完善風險管理及內部控制系統能提升我們的持續發展能力。

### 對持份者的責任

本集團致力於吸引持份者，不斷提升我們為彼等創造價值的能力。我們根據業務及運營特點識別關鍵持份者。我們通過各種溝通方式傾聽並回應彼等的合理關注，該等方式包括但不限於股東週年大會及其他定期股東大會、官方網站、電郵、年度報告、中期報告等出版物以及其他公告及通告等。我們亦珍視我們寶貴僱員的意見。僱員可直接透明地與管理層溝通並提供反饋意見。我們認為不同持份者的觀點，令我們能夠完善策略並穩固可持續發展的步伐。

本集團致力於投資優質資產，並為股東謀求最大的長期利益。我們明白長期取得可持續回報的價值。董事會負責批准所有投資／撤資決策，並根據本集團的投資目標及政策，制定本集團的總體投資策略及指引。

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Our investment team is responsible for, inter alia, identifying, reviewing and evaluating suitable investment or divestment opportunities, assisting the Board in the execution of investment and divestment decisions and monitoring the investments of the Group. When a potential investment opportunity arises, our investment team will evaluate it thoroughly and critically in order to reduce investment risks and protect the interests of shareholders. In making investment decisions, we adopt a responsible and prudent approach to balance profitability and risk.

### **MATERIALITY ASSESSMENT**

A materiality assessment was performed in order to identify sustainability topics that are material and relevant to the Group. To identify potential material topics for disclosure in the ESG Report, we took reference to the ESG Reporting Guide and set possible topics for assessment. Integrating feedback collected and management's evaluation, we identified "Quality of Investment", "Corporate Governance", "Anti-corruption" and "Talent Attraction and Retention" as the material ESG issues to the Group and its stakeholders. This exercise facilitated us in aligning our sustainability priorities with stakeholders' expectations and focusing on the material and relevant issues.

我們的投資團隊負責（其中包括）識別、審查及評估合適投資或撤資機會，協助董事會執行投資及撤資決策，並監控本集團的投資。當潛在投資機會出現時，我們的投資團隊將對其進行徹底及嚴格評估，以降低投資風險並保障股東利益。於作出投資決策時，我們採用負責及審慎的方法，以平衡盈利能力及風險。

### **重要性評估**

我們已進行重要性評估，以識別對本集團屬重大且相關的可持續發展議題。為識別於ESG報告中披露的潛在重大議題，我們已參考ESG報告指引並就評估設置可能議題。結合收集的反饋意見及管理層評估，我們確定「投資質量」、「企業管治」、「反貪污」及「吸引及挽留人才」為本集團及其持份者的重大ESG議題。這項工作有助於我們將可持續發展的優先重點與持份者的期望保持一致，並專注於重大及相關議題。

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### OUR ENVIRONMENT

Being an investment company, we are also conscious of our investment decision and the potential impact on the environment contributed by our investment. When the investment opportunity arises, we would consider the risk and return dynamics of the projects as well as the potential positive and negative environmental effects caused by the projects.

During the Year, the Group did not violate any environmental protection laws and regulations that had a significant impact on the Group relating to air and greenhouse gas emissions, discharges into water and land, and generation of hazardous and non-hazardous wastes.

### EMISSIONS AND USE OF RESOURCES

We have no manufacturing plant or company-owned vehicle and do not produce direct air emissions. Our environmental impact is mainly due to the consumption of electricity, water, office supplies and the indirect greenhouse gas emission generated therefrom. The electricity supply, water supply and sewage discharge are under the exclusive control of the owner and the property manager of the office premises. We are unable to obtain electricity and water usage data for disclosure purposes. The daily water consumption is mainly supplied from the municipal water network, and there is no difficulty in sourcing water.

### 環境

作為一家投資公司，我們亦意識到我們的投資決策及我們的投資對環境的潛在影響。當投資機會出現時，我們會考慮項目的風險和回報動態以及項目可能帶來的正面及負面環境影響。

於本年度，本集團並無違反任何有關廢氣及溫室氣體排放、向水及土地的排污、有害及無害廢棄物的產生的環境保護法律法規而對本集團有重大影響的情況。

### 排放及資源使用

我們並無生產廠房或公司自有車輛，亦無產生直接空氣排放。我們對環境的影響乃主要由於電力、水、辦公用品的消耗以及由此產生的間接溫室氣體排放。電力供應、供水及污水排放完全由辦公場所的業主及物業管理公司控制。我們無法獲得電力消耗及用水數據以作出披露。日常用水主要來自市政供水網絡，取水並無困難。

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Despite that, we adhere to low-carbon operations in an effort to reduce energy and resources consumption. We have implemented the measures below to minimize our impacts on the environment.

儘管如此，我們仍堅持低碳運營，減少能源及資源消耗。我們一直在實施下列措施，以最大程度地減少對環境的影響。



### Waste Management

Since the Group does not produce physical products, no hazardous waste was generated and no packaging material has been used. General refuse from our office mainly consists of paper, aluminium cans and plastic bottles. We estimate that less than 0.1 tonnes of non-hazardous waste were generated in our office during the Year, similar to that of the previous year.

### 廢棄物管理

由於本集團並不生產有形產品，故並不產生有害廢棄物，亦不使用任何包裝材料。辦公室產生的一般廢棄物主要包括紙張、鋁罐及塑料瓶等。於本年度內，我們估計辦公室產生的無害廢棄物少於0.1噸，與過往年度類似。



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The Group also supports waste sorting and recycling. We dispose rechargeable batteries at designated collection boxes and segregate used papers, letters and envelopes for recycling. The Group advocates the “4R” principles of Reduce, Reuse, Replace and Recycle with actions as follows:

本集團亦支持廢物分類及回收。我們將可充電式電池棄置於指定收集箱，分開用過的紙張、信件及信封進行回收。本集團倡導減少使用、重複使用、代替及循環利用的「4R」原則，並採取以下行動：

### Reduce 減少使用

- Use double-sided printing and photocopying whenever possible
- Promote “Think Twice Before Copy” in the office to avoid unnecessary printings
- 盡可能使用雙面打印及複印
- 在辦公室推廣「三思而後印」以避免不必要的打印

### Reuse 重複使用

- Reuse single-sided paper whenever possible
- Reuse pen shafts with ink refills rather than disposing them
- Encourage staff to reuse stationery, e.g. used envelop and document folder
- 盡可能重複使用單面紙張
- 補充筆芯及重複使用筆桿，而非在使用後丟棄筆桿
- 鼓勵員工重複使用文具，例如使用過的信封及文件夾

### Replace 代替

- Encourage the use of electronic communication means, e.g. emails and soft copies instead of letters or fax
- Whenever possible, adopt virtual meeting and teleconferencing instead of business travel to cut unnecessary trips and the greenhouse gas emission therefrom
- 鼓勵使用電子通訊方式，例如電郵及電子版，而並非信件或傳真
- 盡可能採用虛擬會議及電話會議代替出差，以減少不必要的出行及由此產生的溫室氣體排放

### Recycle 循環利用

- Except papers containing confidential information, all waste paper is sent to paper mills or scrap paper collectors
- Send printer cartridges to producer for recycling
- Make sure that the recyclables collected are collected by recyclers for proper recycling
- 除包含機密資料的紙張外，所有廢紙均送往造紙廠或廢紙收集處
- 打印機墨盒送往生產商進行回收
- 確保所收集的可回收物由回收商收集，以便妥善循環利用

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The Group believes we have reduced our emissions and conserved resources through these actions. We will continue to identify opportunities to improve our environmental performance.

### **Use of Packaging Material**

Given our business nature, the Group does not have manufacturing facilities and does not consume a significant amount of packaging materials.

### **THE ENVIRONMENT AND NATURAL RESOURCES**

As our operation is office-based, we do not induce a substantial negative impact on the environment. The Group strictly complies with applicable environmental laws and regulations, such as the Waste Disposal Ordinance (Cap. 354) and is committed to promoting a green office. We adopt environmentally friendly measures so as to achieve green operation. The Group recognizes that the emission of greenhouse gases is one of the factors leading to climate change. Although there are no industrial or commercial processes in the daily operation, the Group will still promote a green lifestyle among the employees and strive to reduce the use of energy and other resources. The Group will do its part to reduce emissions while ensuring that it continues to grow and prosper.

本集團認為，我們已通過該等措施減少排放及節省資源。我們將繼續尋找改善環境表現的機會。

### **使用包裝材料**

鑑於我們的業務性質，本集團並無生產設施，亦不會消耗大量包裝材料。

### **環境及天然資源**

由於我們的業務於辦公室運營，我們不會對環境造成重大負面影響。本集團嚴格遵守適用環境法律及法規，例如《廢物處置條例》（第354章），並致力於推廣綠色辦公。我們採取環保措施以實現綠色運營。本集團認識到溫室氣體排放乃導致氣候變化的因素之一。儘管日常運營中並無工業或商業流程，但本集團仍將於僱員之間推廣綠色生活方式，努力減少能源及其他資源的使用。本集團將盡其所能減少排放，同時確保其繼續發展及繁榮。

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### CLIMATE CHANGE

The Group recognizes that climate change is a global challenge and may affect the communities and business operation in a negative way. Since the Group does not have any manufacturing plant or supply chain, our major operations will not be materially impacted by climate-related issues.

Nevertheless, the acute physical risks may still pose danger to our employees. The extreme weather conditions, such as typhoons, heavy rains, heatwaves and storms, will be intensified and more frequent. To safeguard the safety of the employee during extreme weather conditions, the Group sets its internal guideline on adverse weather arrangement in times of typhoon, rainstorm and extreme conditions after super typhoons. The Group would stay alert to any announcements by the local governments on weather condition and prepare for emergency actions.

### OUR PEOPLE

We rely on our talented employees to provide outstanding investment services with professional and informed decisions. We value the contributions of our staff to the operation and sustainable development of our business. We understand the importance of attracting, developing and retaining talents by providing them with an excellent working environment and achieving mutual success together with the Group.

### 氣候變化

本集團認識到氣候變化乃一項全球性挑戰，可能會對社區及業務運營產生負面影響。由於本集團並無任何生產廠房或供應鏈，我們的主要業務將不會受到氣候相關問題的重大影響。

儘管如此，緊急的實體風險仍可能對我們的僱員構成危險。颱風、暴雨、熱浪及暴風雨等極端天氣狀況將加劇及更加頻繁。為保障僱員在極端天氣狀況下的安全，本集團已制定颱風、暴雨及超強颱風後的極端情況下等惡劣天氣安排的內部指引。本集團將密切留意當地政府有關天氣狀況的任何公告，並做好應急行動的準備。

### 員工

我們憑藉優秀僱員以專業及明智決策提供出色的投資服務。我們重視員工在業務運營及可持續發展方面的貢獻。我們了解通過提供良好的工作環境並與本集團取得共同成功，以吸引、發展及挽留人才的重要性。

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### EMPLOYMENT AND LABOUR STANDARD

We protect the legitimate rights and benefits of employees and strictly comply with the Employment Ordinance (Cap. 57), the Employees' Compensation Ordinance (Cap. 282), the Mandatory Provident Fund Schemes Ordinance (Cap. 485), the Minimum Wage Ordinance (Cap. 608) and other relevant laws and regulations on employment and labour standards.

#### Talent Attraction and Retention

We offer competitive remuneration, promotion opportunity, compensation and benefit packages to attract and retain talents. Our remuneration package comprises with basic salary, MPF, five-day working week, medical insurance and share option scheme. The package is determined with reference to the qualifications, performance and work experience of the individual as well as the market rates. We have specified standard working hours, holidays and rest periods, remuneration and welfare, compensation and dismissal in employment contracts. Employees are provided with sick and injury leaves, maternity and paternity leaves and other entitlements according to the laws of Hong Kong.

The Group is committed to supporting and developing its staff to enable them to carry out their work effectively and fulfill their potential. Staff appraisals will be conducted in comfortable surroundings and free from interruptions annually to encourage an honest exchange of views. Remuneration packages are reviewed periodically based on our operating results, individual performance and market information. Employees may be promoted on basis of their performance in the current jobs and the extent to which they demonstrate the attributes required for the higher grade.

### 僱傭及勞工準則

我們保障僱員的合法權益，嚴格遵守《僱傭條例》（第57章）、《僱員補償條例》（第282章）、《強制性公積金計劃條例》（第485章）、《最低工資條例》（第608章）及其他有關僱傭及勞工準則的法律及法規。

#### 吸引及挽留人才

我們提供具競爭力的薪酬、晉升機會及福利待遇，以吸引及挽留人才。我們的薪酬待遇包括基本工資、強積金、五天工作週、醫療保險及購股權計劃。待遇乃根據個人的資歷、表現及工作經驗以及市場價格釐定。我們於勞動合同中規定標準工時、節假日及休息時間、薪酬及福利、補償及解僱。根據香港法例，向僱員提供病假及工傷假、產假及陪產假以及其他應享權利。

本集團致力於支持及發展其員工，使彼等能夠有效地開展工作並發揮其潛力。員工評估將每年於舒適的環境中進行，不會受到干擾，以鼓勵誠實地交換意見。薪酬待遇會根據我們的經營業績、個人表現及市場資料定期進行檢討。本集團可能會根據僱員在當前工作中的表現以及彼等擁有高階工作所需能力的程度來晉升僱員。

# Environmental, Social and Governance Report

## 環境、社會及管治報告

Meanwhile, any appointment, promotion or termination of employment contract would be based on reasonable, lawful grounds and internal policies, such as staff handbook. The Group strictly prohibits any kinds of unfair or unreasonable dismissals.

### Equal Opportunities

The Group adheres to the principles of fairness and mutual respect. We comply with, in all material respects, the following ordinances and the relevant codes of practice issued by the Equal Opportunities Commission of Hong Kong: Sex Discrimination Ordinance (Cap. 480), Disability Discrimination Ordinance (Cap. 487), Family Status Discrimination Ordinance (Cap. 527), and Race Discrimination Ordinance (Cap. 602). We treat all employees and candidates equally and avoid any forms of discrimination, including age, gender, marital status, pregnancy, disability, religion and ethnicity, in recruitment, remuneration and promotion.

### Anti-child and Forced Labour

The Group does not tolerate any child or forced labour. We ensure all new joiners meet the minimum age for legal employment through the recruitment process. To combat against illegal employment on child and forced labour, the Group's human resources department requires job applicants to provide valid identity documents before confirmation of employment to ensure that the applicants are lawfully employable. All the personal information provided during recruitment should be real and effective. If there is any mendacious information, the Group will terminate the employment according to relevant laws and regulations. The Human Resources Department of the Group is responsible to monitor and ensure compliance by the Group with the latest relevant laws and regulations that prohibit child labour and forced labour.

同時，任何聘用、晉升或終止勞動合同均將基於合理、合法的理據及員工手冊等內部政策。本集團嚴禁任何形式的不公平或不合理解僱。

### 平等機會

本集團恪守公平及相互尊重的原則。我們於所有重大方面均遵守香港平等機會委員會頒佈的下列條例及有關常規守則：《性別歧視條例》（第480章）、《殘疾歧視條例》（第487章）、《家庭崗位歧視條例》（第527章）及《種族歧視條例》（第602章）。我們平等對待所有僱員及候選人，在招聘、薪酬及晉升方面避免任何形式的歧視，包括年齡、性別、婚姻狀況、懷孕、殘疾、宗教及種族。

### 反童工及強迫勞動

本集團不容忍任何童工或強迫勞動。我們通過招聘過程確保所有新入職人員均達到合法就業的最低年齡。為打擊非法僱傭童工及強迫勞動，本集團人力資源部於確認僱傭關係前會要求應聘者提供有效身份文件以確保應聘者可合法受聘。於招聘期間提供的所有個人信息應真實有效。如有任何虛假信息，本集團將根據相關法律法規終止僱傭關係。本集團人力資源部負責監控及確保本集團遵守禁止童工及強迫勞動的最新相關法律法規。

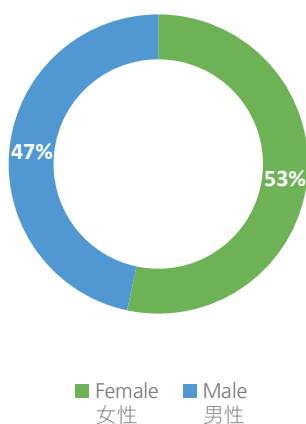
# Environmental, Social and Governance Report

## 環境、社會及管治報告

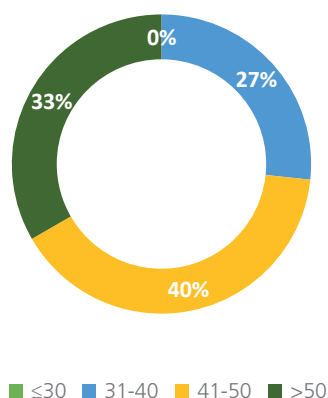
The Group has not identified any significant non-compliance with laws and regulations relating to employment, recruitment and dismissal, equal opportunities or other issues regarding labour standards during the Year. As at the end of the Year, the total number of employees was 15. The charts below demonstrated the breakdown of the employees by gender, age group, employee category and geographical region.

於本年度內，本集團並無發現任何嚴重違反與僱傭、招聘及解僱、平等機會或其他有關勞工準則相關的法律及法規的情況。於本年度末，僱員總數為15人。下圖顯示按性別、年齡組別、僱員類別及地區劃分的僱員明細。

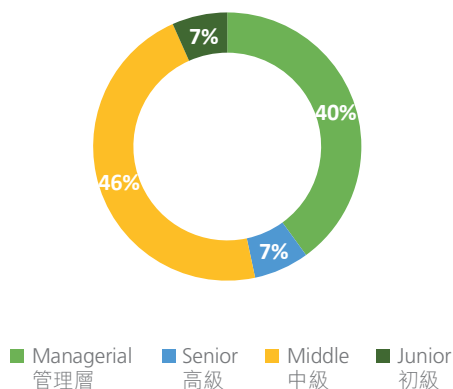
**Number of Employee By Gender**  
按性別劃分的僱員人數



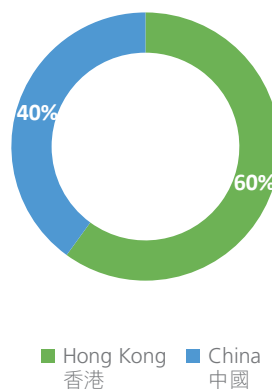
**Number of Employee By Age Group**  
按年齡組別劃分的僱員人數



**Number of Employee By Employee Category**  
按僱員類別劃分的僱員人數



**Number of Employee By Geographical Region**  
按地區劃分的僱員人數



# Environmental, Social and Governance Report

## 環境、社會及管治報告

### HEALTH AND SAFETY

The Group undertakes to safeguard the health and safety of its employees and expects all employees to strictly observe the Company's health & safety policies. As an investment company, all our staff work in offices and are not exposed to significant health and safety risks. Nevertheless, potential injury hazards from slips, trips and falls for staff remain. In order to prevent work-related injuries and ensure the well-being of our employees, the following measures have been implemented:

### 健康與安全

本集團承諾保障其僱員的健康與安全，並期望全體僱員嚴格遵守本公司的健康與安全政策。作為一家投資公司，我們所有員工均在辦公室工作，不會面臨重大健康及安全風險。然而，仍然存在人員滑倒、絆倒及跌倒的潛在傷害危險。為防止工傷及確保僱員的福祉，我們已採取以下措施：

Strictly prohibit smoking in office to safeguard indoor air quality  
嚴禁辦公室吸煙，以保障室內空氣質量

Ensure adequate ventilation and suitable lighting for efficient daily operations  
確保充足的通風及適當的照明，以確保高效的日常運行

Provide adjustable office chairs and computer monitors to facilitate good posture and reduce eye strain  
提供可調節的辦公椅及電腦顯示器，以利於良好的姿勢及減輕眼睛疲勞

Keep common areas of the office, such as corridors and pantry, hygienic and tidy  
保持辦公室公用區域，例如走廊及茶水間的衛生及整潔

Provide occupational health guidelines for staff to raise their awareness  
為員工提供職業健康指引，以提高彼等的意識

Regularly clean the air conditioning equipment  
定期清潔空調設備

Prepared a first-aid kit in the office in case of emergency  
在辦公室準備急救箱以備緊急情況

# Environmental, Social and Governance Report

## 環境、社會及管治報告

In response to the coronavirus pandemic, we have introduced precautions to safeguard the health of our staff:

- closely monitor the news and updates of the event of coronavirus and adjust the operations of employees accordingly if required;
- prepare virus prevention materials including surgical masks and disinfection supplies for the office and employees;
- provide hand sanitizers for employees and visitors;
- measure body temperature before entering the office;
- require staff to wear face masks in the office;
- reduce face-to-face communications; and
- home office arrangement is adopted and continuously reviewed to lower the risk of infection

The Group strictly abides by the Occupational Safety and Health Ordinance (Cap. 509) or other relevant laws and regulations on health and safety. During the past three years, including the Year, no cases in relation to work injuries or fatalities were recorded. We were not aware of any significant non-compliance with the applicable regulations on occupational health and safety during the Year.

為應對冠狀病毒大流行，我們採取預防措施以保障員工的健康：

- 密切監察冠狀病毒事件的新聞及最新消息，並在需要時相應地調整僱員的操作；
- 為辦公室及僱員準備防病毒物料，包括口罩及消毒用品；
- 為僱員及訪客提供洗手液；
- 進入辦公室前測量體溫；
- 要求員工在辦公室佩戴口罩；
- 減少面對面交流；及
- 採納家庭辦公安排，並不斷進行審查，以降低感染風險

本集團嚴格遵守《職業安全及健康條例》（第509章）或其他有關健康與安全的法律及法規。於過去三年（包括本年度）內，並無記錄與工傷或死亡相關的案例。於本年度內，我們並不知悉任何嚴重違反有關職業健康與安全的適用法規的情況。



# Environmental, Social and Governance Report

## 環境、社會及管治報告

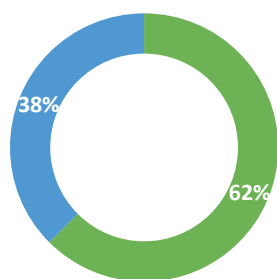
### DEVELOPMENT AND TRAINING

We recognize the importance of staff training and development for the mutual growth of both the Group and our employees. We encourage the continuing education of our directors and employees to further enhance their skills, acquire professional knowledge and keep abreast of the latest developments in the industry, through participation in training organized by professional bodies. The company secretary provides regular briefings to the directors to ensure they understand the updates on statutory and regulatory requirements and are fully aware of their roles and responsibilities. During the Year, 53% of our employees received training arranged by the Group and the average training hour was 1.1 hour per employee. For detailed breakdown of the trained employee and the average training hours by gender, employee category and function, please refer to the “Summary of Key Performance Indicators” section.

### 發展及培訓

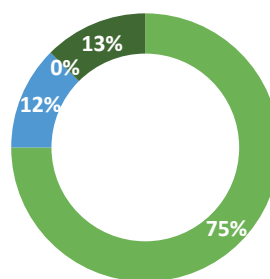
我們認識到員工培訓及發展對於本集團及僱員共同成長的重要性。我們鼓勵董事及僱員的持續教育，通過參加專業機構組織的培訓，進一步提高技能，掌握專業知識，並緊跟行業的最新發展。公司秘書會向董事提供定期簡介，確保彼等了解有關法定及監管規定的最新消息，充分了解其角色及職責。於本年度內，53%的僱員已接受本集團安排的培訓，平均培訓時數為每名僱員1.1小時。有關受訓僱員的詳盡明細以及按性別、僱員類別及職能劃分的平均培訓時數，請參閱「關鍵績效指標概要」一節。

**Number of Trained Employee By Gender**  
按性別劃分的受訓僱員人數



Female 女性 Male 男性

**Number of Trained Employee By Employee Category**  
按僱員類別劃分的受訓僱員人數



Managerial 管理層 Senior 高級 Middle 中級 Junior 初級

# Environmental, Social and Governance Report

## 環境、社會及管治報告

### OUR SOCIETY

#### SUPPLY CHAIN MANAGEMENT

The Group's suppliers mainly include securities brokers, professional service providers for legal, advisory and other services, as well as various suppliers for office equipment and hardware. Our supply chain is rather simple and the environmental and social risk involved is relatively low. During the Year, the total number of suppliers of the Group was 8 and all of them are located in Hong Kong.

We consider qualifications, compliance, business scale and reputation when choosing suppliers. Our suppliers are expected to comply with national and local laws and regulations relating to business conduct, environmental protection and other business practices. If a supplier is found in non-compliance with our policies or contractual provisions, we will suspend the business relationship until the irregularity has been rectified. The Group was not aware of any non-compliance incidents or notable adverse impacts on business ethics, environmental protection, human rights and labour practices among our major suppliers in the Year.

### PRODUCT RESPONSIBILITY

#### Protection of Data Privacy

We protect the information security of our stakeholders, including business partners, employees and identified individuals. The contents of privacy matters are confidential and access thereto is restricted to the provisions of the Privacy Ordinance. We established various measures to ensure effective data privacy. To safeguard our information assets and prevent data leakage, we require our employees to handle sensitive or confidential information cautiously. The usage of data is strictly bound to the purposes in accordance with relevant contract terms.

### 社會

#### 供應鏈管理

本集團的供應商主要包括證券經紀、提供法律、諮詢及其他服務的專業服務供應商，以及辦公設備及硬件的各種供應商。我們的供應鏈非常簡單，涉及的環境及社會風險相對較低。於本年度內，本集團的供應商總數為8名，均位於香港。

於選擇供應商時，我們會考慮資格、合規性、業務規模及聲譽。我們的供應商須遵守與商業行為、環境保護及其他商業慣例相關的國家及地方法律法規。倘發現供應商違反我們的政策或合同規定，我們將中止業務關係，直到違規行為得到改正為止。於本年度內，本集團並無知悉主要供應商出現任何違規事件或對商業道德、環保、人權及勞動慣例等方面造成的負面影響。

### 產品責任

#### 保護數據私隱

我們保護持份者（包括業務合作夥伴、僱員及所識別的個人）的資料安全。私隱事宜的內容屬機密，查閱有關內容受《私隱條例》的條文限制。我們制定多項措施，確保有效的數據隱私。為保障信息資產並防止數據洩漏，我們要求僱員謹慎處理敏感或機密資料。數據的使用應嚴格遵守相關合同條款。

# Environmental, Social and Governance Report

## 環境、社會及管治報告

Employees are not allowed to disclose, exploit or use directly or indirectly confidential information regarding the Group to which they have access as a result of their employment. Failure to observe this rule may lead to summary dismissal without compensation by the Group. The Group was not aware of any material non-compliance with the Personal Data (Privacy) Ordinance (Cap. 486) or any other applicable laws or regulatory requirements on data privacy during the Year.

### Intellectual Property Rights

The Group will provide licensed software for use by its employees in performing their duties. Employees are strictly forbidden from installing and using illegal software on the computers owned by the Group.

As the Group is principally engaged in investment, the Group believes that health and safety, advertising and labelling matters relating to products and services provided are irrelevant to our business. Therefore, no disclosure about policies of these issues is made in this ESG Report.

### ANTI-CORRUPTION

We believe integrity and honesty are fundamental in our business. The Group prohibits any form of corruption, such as bribery, extortion, fraud and money laundering. We will not hesitate to take disciplinary actions in case of any substantiated misconduct.

僱員不得直接或間接披露、利用或使用彼等因受僱而接觸到的有關本集團的機密信息。未能遵守此規則可能會導致本集團毋須賠償而立即解僱。於本年度內，本集團並無發現任何嚴重違反《個人資料(私隱)條例》(第486章)或任何其他有關數據私隱的適用法律或法規規定的情況。

### 知識產權

本集團將提供特許軟件供其僱員在履行職責時使用。嚴禁員工在本集團擁有的計算機上安裝及使用非法軟件。

由於本集團主要從事投資，故本集團認為有關產品及所提供服務的健康與安全、廣告及標籤事宜與我們的業務無關。因此，本ESG報告未披露有關該等議題的政策。

### 反貪污

我們認為，誠信及誠實為我們業務的基礎。本集團禁止任何形式的腐敗，例如賄賂、勒索、欺詐及洗錢。倘發生任何經證實的不當行為，我們將毫不猶豫地採取紀律處分。

# Environmental, Social and Governance Report

## 環境、社會及管治報告

In order to promote sound and effective corporate governance, the Group established the internal “Conflict of Interest Policy” to set out the Code of Conduct and procedures during handling potential conflict of interest. The Group strictly prohibits anyone from offering, soliciting or accepting bribes or participating in any solicitation, acceptance, payment or offer of a bribe or kickback. Any employee doing so commits an offence under the Prevention of Bribery Ordinance (PBO).

Employees are required to report to management through their department manager or the Human Resources Department of incidents or suspected cases of corruption, theft, fraud and embezzlement. The internal “Whistle-blowing Policy” provide formal communication channels for employees and any other persons to raise or report any concerns relating to Malpractices that may have been committed by the Group or its employees in the capacity of employees of the Group. All matters raised by the whistle-blower will be kept strictly confidential. The Group has established the Audit Committee (“AC”) to specifically attend to any concerns on Malpractice within or relating to the Group. Management will make an investigation and report to the police or ICAC if appropriate.

We strictly abide by relevant laws and regulations including the Prevention of Bribery Ordinance (Cap. 201) and no legal cases relating to corruption were brought against the Group or its employees during the Year. We will continue to strengthen the culture of integrity and consistently incorporated anti-corruption in its governance at all business levels by providing anti-corruption training to our directors and employee if necessary.

### COMMUNITY INVESTMENT

The Group strives to be a responsible corporate citizen and cares about the development of the community where we operate. We encourage our staff to actively participate in social welfare activities and volunteering services or make donations to charitable organizations.

為促進健全有效的企業管治，本集團制定內部「利益衝突政策」，列明處理潛在利益衝突的行為守則及程序。本集團嚴禁任何人士提供、索取或接受賄賂或參與任何索取、接受、支付或提供賄賂或回扣。如此行事的僱員均屬違反《防止賄賂條例》。

僱員須通過其部門經理或人力資源部向管理層報告貪污、盜竊、欺詐及挪用公款的事件或疑似案件。內部「舉報政策」為僱員及任何其他人士提供正式的溝通渠道，以提出或報告與本集團或其僱員以本集團僱員身份可能犯下的不當行為有關的任何問題。舉報人提出的一切事項均將嚴格保密。本集團已成立審計委員會（「審計委員會」），專門處理有關本集團內部或與本集團相關的任何不當行為的問題。管理層會進行調查，並在適當情況下向警方或廉政公署報告。

於本年度內，我們嚴格遵守《防止賄賂條例》（第201章）等相關法律法規，並無出現針對本集團或其僱員提出的貪污腐敗相關法律案件。我們將繼續加強誠信文化，並在所有業務層面持續將反貪污納入其治理，必要時為董事及僱員提供反貪污培訓。

### 社區投資

本集團致力於成為負責任的企業公民，並關心我們經營所在社區的發展。我們鼓勵員工積極參加社會公益活動及志願服務或向慈善組織捐款。

# Environmental, Social and Governance Report

## 環境、社會及管治報告

### SUMMARY OF KEY PERFORMANCE INDICATORS

### 關鍵績效指標概要

#### Social Aspects

2021

社會層面

二零二一年

#### Aspect B1: Employment

層面 B1：僱傭

B1.1

#### Total workforce

員工總數

Total number of employees

15

僱員總數

By gender

Female

8

按性別劃分

女性

Male

7

男性

By employment type

Full-time

8

按僱傭類別劃分

全職

Part-time

7

兼職

By age group

30 years old or below

0

按年齡組別劃分

30歲或以下

31-40 years old

4

31-40歲

41-50 years old

6

41-50歲

Over 50 years old

5

50歲以上

By employee category

Management

6

按僱員類別劃分

管理層

Senior

1

高級

Middle

7

中級

Junior

1

初級

# Environmental, Social and Governance Report

## 環境、社會及管治報告

<b>Social Aspects</b>		<b>2021</b>	
<b>社會層面</b>		<b>二零二一年</b>	
By function	Executive		6
按職能劃分	執行		
	Technical		2
	技術		
	Administrative		0
	行政		
	Production		7
	產品		
By geographical region	Hong Kong		9
按地區劃分	香港		
	China		6
	中國		
<b>B1.2</b>	<b>Employee turnover rate</b>		
	僱員流失率		
	Total employee turnover rate		0%
	僱員總流失率		
<b>Aspect B2: Health and Safety</b>			
<b>層面 B2：健康與安全</b>			
<b>B2.1</b>	<b>Number of work-related fatalities</b>		<b>0</b>
	因工亡故的人數		
	Rate of work-related fatalities		0%
	因工亡故的比率		
<b>B2.2</b>	<b>Lost days due to work injury</b>		<b>0</b>
	因工傷損失工作日數		
<b>Aspect B3: Development and Training</b>			
<b>層面 B3：發展及培訓</b>			
<b>B3.1</b>	<b>Number of trained employees</b>		
	受訓僱員人數		
	Total number of trained employees		8
	受訓僱員總數		
	Percentage of total employees trained		53.3%
	受訓僱員總數百分比		
By gender	Female		62.5%
按性別劃分	女性		
	Male		37.5%
	男性		

# Environmental, Social and Governance Report

## 環境、社會及管治報告

Social Aspects		2021	
社會層面		二零二一年	
By employee category 按僱員類別劃分	Management	75.0%	
	管理層		
	Senior	12.5%	
	高級		
	Middle	0%	
	中級		
By function 按職能劃分	Junior	12.5%	
	初級		
	Executive	75.0%	
	執行		
	Technical	25.0%	
	技術		
Administrative	行政	0%	
	Production	0%	
	產品		
	<b>B3.2 Average training hours completed</b>		
	完成受訓的平均時數		
	Training hours per employee		1.1
每名僱員受訓時數			
By gender 按性別劃分	Female	1.3	
	女性		
Male	0.9		
	男性		
By employee category 按僱員類別劃分	Management	2.0	
	管理層		
	Senior	2.0	
	高級		
	Middle	0	
	中級		
By function 按職能劃分	Junior	2.0	
	初級		
	Executive	2.0	
	執行		
	Technical	2.0	
	技術		
Administrative	行政	-	
	Production	0	
	產品		

# Environmental, Social and Governance Report

## 環境、社會及管治報告

### Social Aspects 社會層面

2021  
二零二一年

#### Aspect B5: Supply Chain Management

##### 層面 B5：供應鏈管理

#### B5.1 Number of suppliers by geographical region

按地區劃分的供應商數目

Total number of suppliers

8

供應商總數

By geographical region

Hong Kong

8

按地區劃分

香港

#### Aspect B7: Anti-corruption

##### 層面 B7：反貪污

B7.1 Number of concluded legal cases

0

已審結的訴訟案件數目





***HARBOUR DIGITAL***

**Harbour Digital Asset Capital Limited**  
**港灣數字產業資本有限公司**