NAVIGATING THE EVOLVING SUSTAINABILITY LANDSCAPE

~]

Renewable Procurement Summit



TOM Group Limited

Incorporated in the Cayman Islands with Limited Liability (Stock Code: 2383)

Sustainability Report 2022

About TOM Group

TOM Group Limited (stock code: 2383) is a technology and media company listed on the Main Board of the Stock Exchange of Hong Kong. TOM Group has technology operations in E-Commerce, Social Network, Mobile Internet; and investments in Fintech and Advanced Data Analytics sectors. In addition, its media businesses cover both publishing and advertising segments. Headquartered in Hong Kong, the Group has regional headquarters in Beijing and Taipei with approximately 1,200 employees. TOM Group is a member of CK Hutchison Holdings Limited.

Contents

	About TOM Group	
	Company Overview	02
	Sustainability at a Glance	03
	Message from the Chief Executive Officer	04
	Our Approach to Sustainability	06
	Sustainability Governance	07
	Sustainability Policy	09
	UN Sustainable Development Goals ("UNSDGs")	11
	Materiality Assessment	13
	Investing in our People	14
	Talent Attraction and Recruitment	15
	Employee Health and Safety	17
	Development and Retention	19
	Workplace Wellbeing	20
	Regulatory Compliance	21
2000	Protecting the Environment	22
	2025 Targets	23
	Operational Eco-efficiency	24
	Use of Resources	26
	Regulatory Compliance	27
Z	Operating Ethically	28
	Business Ethics and Compliance	29
	Cybersecurity and Customer Privacy	31
	Intellectual Property Protection	34
	Supply Chain Management	34
	Regulatory Compliance	35
and a	Serving the Community	36
	About this Report	39
	Key Performance Data	40
	Environmental Data	40
	Social Data	41
	Hong Kong Stock Exchange ESG Guide Content Index	43





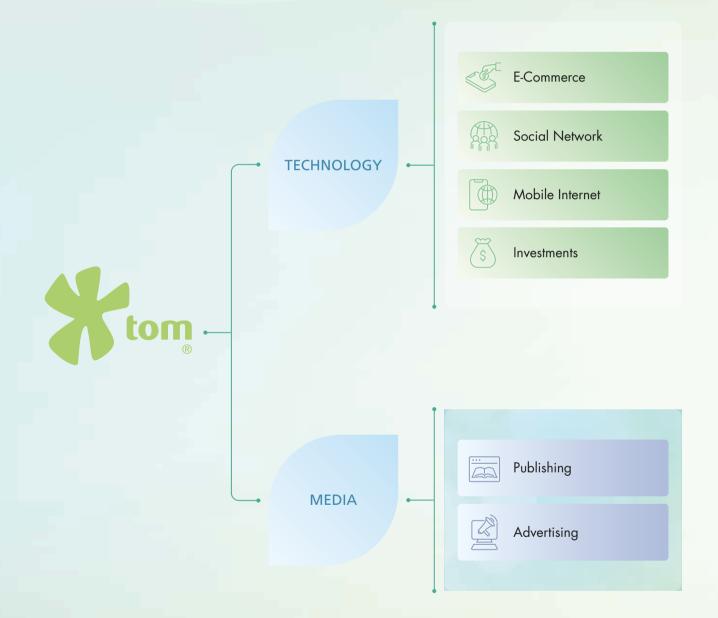








Company **Overview**



Sustainability at a Glance

of TOM Group Limited and its subsidiaries ("Group" or "TOM Group")



hope to disadvantaged groups in the community.

Message from the Chief Executive Officer

Articulating our sustainability strategy and aspirations, our latest report shares the Group's sustainability commitment, while highlighting our annual sustainability journey, progress and performance across the ESG domains.

TOM Group published its first in-depth standalone Sustainability Report last year. Articulating our sustainability strategy and aspirations, we are pleased to share this latest report to convey the Group's sustainability commitment to our valued stakeholders, while highlighting our annual sustainability journey, progress and performance across the Environmental, Social and Governance ("ESG") domains.

2022 turned out to be a tough year in which the global pandemic continued to present formidable challenges to our business, people and operation. This report documents how, despite these disruptions, we have striven to keep our people and stakeholders safe and our business viable, while accelerating towards our goal to be at the forefront of sustainability in the technology and media sectors of Asia.

In the face of COVID-19, we have taken measures to protect our staff and visitors through the continual implementation of hygiene and social distancing protocols and flexible work arrangements, while providing an ample supply of sanitizers and disinfectants at our workplace. As a law-abiding organisation, we fully comply with the guidelines and regulations of the local health authorities in mainland China, Hong Kong and Taiwan, where our business operations are mainly based.

A market leader in the publishing industry of Taiwan, the Group has converted its content increasingly into formats for digital distribution, to take advantage of the latest communications technology trends that are now shaping the world and avoid unnecessary paper use that would aggravate global climate change.

Our fight against climate change

Global warming is a clarion call to act sustainably not least because it affects everyone around the globe, even threatening our collective survival. Our Company's commitment to combat climate change is rooted in the belief that business and sustainability go hand in hand. Weather impacts how a business operates in different ways. Extreme weather events introduce new economic risks, drive up costs and disrupt supply chains, among the many negative outcomes it will lead to. For this reason, we have done our part to mitigate our carbon impact by gradually replacing our servers, network equipment, computers and other office equipment with energy-efficient ones with Energy Star certification, while opting to use plastic packaging with recycled plastic content. These are no piecemeal efforts but part of our sustainability plans that have been consistently enforced for years with concrete targets and deadlines.

Given the growing scale and severity of the challenge, we have put sustainability at the heart of the Company's strategy. This means running our operations sustainably and making sustainability our business.

Embracing **bigger goals** and cutting-edge technology for Sustainability

We have identified the United Nations Sustainable Development Goals ("UNSDGs) to which we can make the most meaningful contribution and align with the Group's four sustainability pillars – The Business, The People, The Environment and The Community. These goals have guided us in mapping out sustainable strategies for partnership engagement and development. They also steer us towards channelling resources to the right areas of sustainable development and with a clearer focus. Investing in Mioying Holdings Inc. ("MioTech"), an artificial intelligence platform that turns data into insights, is a move we made in line with our core sustainability beliefs and values. MioTech's capabilities have been harnessed to solve the sustainability, climate change, carbon emissions reduction, and social responsibility challenges faced by financial institutions, corporations, governments and individuals. Besides helping customers manage ESG reporting, improve energy efficiency, track and reduce carbon emissions, the data it generates also empower financial institutions to make the right decisions in green finance and responsible investments.

Giving back with gratitude

We have also done much to benefit different stakeholder groups and communities over the past years. These include providing our staff with a safe, inclusive environment to work in and equal opportunities for them to learn and thrive. We have continued to support and equipped them with new professional and soft-skills in order to be future-ready in the fast-evolving workplace.

Giving back to the communities we operate in, the Group has participated in philanthropy, held campaigns and events in collaboration with non-governmental organisations to promote the interests of disadvantaged groups and made corporate donations.

We wish to thank our Board and Sustainability Committee members for their guidance and all our staff and stakeholders for their unwavering support in yet another challenging year. Through our collective efforts, we believe the Group will realise our aspiration in building a cleaner, greener and more sustainable future.

We hope you enjoy reading this second standalone Sustainability Report of TOM Group and glean some insights from our commitments, past contributions as well as collaborations with our stakeholders to create shared value for everyone.

Yeung Kwok Mung Chief Executive Officer/ Chairman of Sustainability Committee Hong Kong, 9 March 2023

05

Our Approach to Sustainability

OUR APPROACH



Sustainability is key to creating long-term value for our Company and society. We believe enterprises today should no longer differentiate between doing good for our planet and doing better in business. It is our firm conviction that driving positive change in the world helps create sustainable value in our business.

At TOM Group, we take strong steps to integrate sustainability and corporate responsibility into every aspect of business, from policies, guidelines, practices and benchmarks that we have formulated, to our routine operations and business decisions undertaken daily. The Group's Sustainability Committee, formed by a group of top experts in their respective fields and led by the CEO, maps out broad strategies to fulfil our sustainability responsibilities, oversees their execution and holds itself accountable to the outcomes.

We adopt an approach that is practical, proactive and results oriented. By aligning our sustainability policies with the UNSDGs resonating with our sustainability cause, we commit our efforts to areas where we can deliver the most meaningful economic, social and environmental impact.

Our sustainability strategy is anchored in four focus areas – The Business, The People, The Community and The Environment – to guide the Group's business operations as we navigate the evolving sustainability landscape.

Sustainability Governance

We firmly believe that sound governance is fundamental to implementing our Group-wide direction and strategy toward sustainability. Under our top-down sustainability governance structure, the Group's Sustainability Committee reports to the Board of Directors, chaired by Executive Director and Chief Executive Officer Mr. Yeung Kwok Mung and comprising Independent Non-Executive Director Dr. Fong Chi Wai, Alex and the Chief Financial Officer and Company Secretary Mr. Man Tak Cheung. At the Group's highest level, the board oversees policy coordination and execution. Our Sustainability Committee holds the following responsibilities:

- To propose and recommend to the board on the Group's corporate social responsibility and sustainability objectives, strategies, priorities, initiatives and goals;
- To oversee, review and evaluate actions taken by the Group in furtherance of the corporate social responsibility and sustainability priorities and goals, including coordinating with the business divisions of the Group and ensuring that their operations and practices adhere to the relevant priorities and goals;
- To review and report to the board on sustainability risks and opportunities;
- To monitor and review emerging corporate social responsibility and sustainability issues and trends that could impact the business operations and performance of the Group;
- To oversee and review the Group's corporate social responsibility and sustainability policies, practices, frameworks and management approach, and to recommend improvements;
- To consider the impact of the Company's corporate social responsibility and sustainability initiatives on its stakeholders, including employees, shareholders, local communities and the environment;
- To review and advise the Board on the Company's public communication, disclosure and publications (including the Sustainability Report) as regards its corporate social responsibility and sustainability performance.

Please refer to the Terms of Reference of the Sustainability Committee ("Committee") for details.



For the year ended 31 December 2022, the Committee conducted three meetings to discuss the development and implementation of the Group's sustainability-related matters, such as review of sustainability-related policies, target settings and staff development. Below is a summary of the work performed by the Committee during the reporting period.

Sustainability-related work performed	March	April	August
Overseeing and reviewing the Group's corporate social responsibilities towards stakeholders, including its employees, shareholders, local communities and the environment	\checkmark	\checkmark	\checkmark
Reviewing and reporting to the Board on sustainability risks and opportunity facing the Group	\checkmark	\checkmark	\checkmark
Monitoring and reporting KPI updates on sustainability targets		\checkmark	\checkmark

Tabulated below are the responsibilities of our Sustainability Committee:



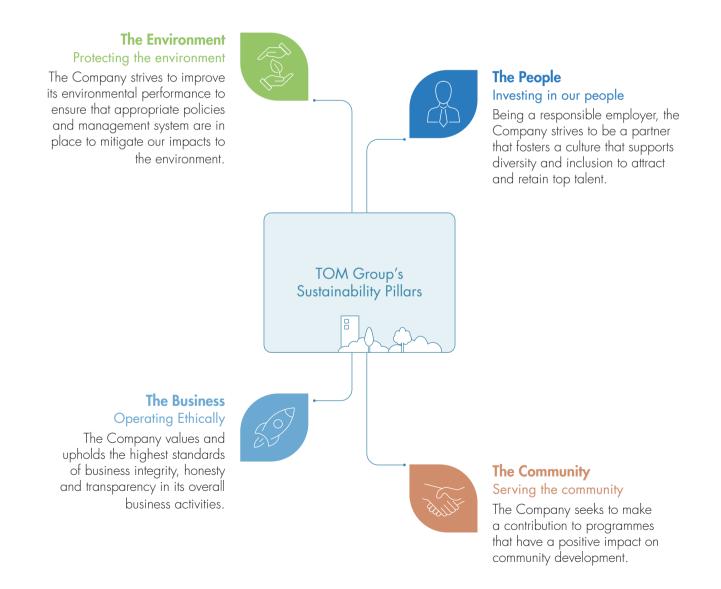
In the period of review, the Group developed a Sustainability Governance and Management Assessment Questionnaire to gather feedback from our various sub-groups and business units on sustainability issues and risks encountered in our core businesses. Twice a year, all our core business units are required to identify and assess the risks facing them along with the control mechanism they have put in place for managing these risks. The outcomes of such self-assessment are reviewed by our Sustainability Committee, then reported to the Board. To date, the feedback received has been largely positive, reflecting a high level of governance and comprehensive processes and systems required for efficient management of material sustainability issues and risks across our business operations.

TOM Group has been investing heavily to make Sustainability an integral part of our Company's business and culture through various initiatives. In 2020, TOM Group invested in MioTech. MioTech leverages artificial intelligence and big data technologies to provide comprehensive ESG solutions including ESG data, real-time risk monitoring, ESG ratings, indices, as well as research and consulting services to financial institutions and listed companies in the Asia Pacific region.

Sustainability Policy

TOM Group has taken a progressive approach to integrating sustainability into our business areas and operations. We have integrated four pillars of sustainability – **The Business**, **The People**, **The Environment** and **The Community** into our overall strategy to ensure all business groups to move in the same direction for creating sustainable long-term value for all stakeholders.

Each pillar is informed by Group policies, corporate leadership and collective efforts across all our business fronts to provide the same ambit for our business groups to manage their operational conduct according to the industries and countries in which they operate. We have also developed various policies, processes and guidelines to direct our management in resolving challenges related to sustainability.



During the year, the Committee reviewed and approved our sustainability policies and their amendments for continuous adoption. The purpose of these sustainability policies is to facilitate the explanation of oversight of sustainability issues by the Group's board of directors (the "Board") as required under Appendix 27 of the Rules Governing the Listing of Securities on the Stock Exchange of Hong Kong Limited ("Listing Rules").

Our corporate and sustainability policies are outlined below, and please refer to our website for more details on the policies.

Areas	Polices and Company standards
Environmental	Environmental Policy Sustainability Policy
Social	Health and Safety Policy Human Rights Policy Modern Slavery and Human Trafficking Statement Employment Policy Corporate Communications Policy Supplier Code of Conduct
Governance	Code of Conduct Anti-Fraud and Anti-Bribery Policy Information Security Policy Policy on Appointment of Third-Party Representatives Policy on Personal Data Governance Whistleblowing Policy Policy on Securities Dealings and Handling of Confidential and Price-sensitive Inside Information Board Diversity Policy Director Nomination Policy Shareholders Communication Policy Competition Compliance Policy Policy on Financial Management and Procedures



UN Sustainable Development Goals ("UNSDGs")

Launched by the United Nations in 2015, the UNSDGs are the blueprint for creating a more sustainable future by 2030. They also provide a critical framework for the Group to drive positive change on key fronts of sustainability. We are convinced that attaining the UNSDGs is beneficial for the global economy and for business in general. Based on this notion, we recognise that the only sustainable business model for TOM Group is one in which all our stakeholders' benefit, while positively impacting the planet and environment as well.

At TOM Group, we recognise the roles we can play in driving sustainable development and have identified nine UNSDGs towards which we can make optimal contributions. We are equally committed to form alliances with our operating companies in utilising our resources judiciously to bring about significant improvements, and sharing how our strategy supports the global sustainable priorities and also establishes a common language we can use to show our stakeholders and industry peers about the efforts we made to help address pressing global challenges.



The Environment SUSTAINABLE CITIES AND COMMUNITIES Embed sustainability We have established an CONSUMPTION considerations in Environmental Policy and a AND PRODUCTION Sustainability Policy to reinforce investments, projects our commitment to protecting and developments. the environment and supporting sustainable development by **13** CLIMATE ACTION managing our environmental footprint across our business operations. We have also formulated environmental targets we aspire to achieve by 2025. astic

TOM Group's Sustainability Pillars	UNSDGs	Our Goals	Our Action
The People	3 COOD HEALTH 4 CUALITY 10 REDUCED	 Create an inclusive and diverse culture. Promote learning and development initiatives in the workplace. 	We have established a Human Right Policy, which is also addressed in the Group's Code of Conduct and Modern Slavery and Human Trafficking Statement. It articulates the Group's expectations regarding human rights. We also aim to create great places to work, and our Sustainability Policy highlights our commitment to diversity, training and development and providing a safe workplace. We have also conducted an employee engagement survey and organised different initiatives to promote the wellbeing of our employees.
The Business	8 BECENT WORK AND ECONOMIC GROWTH	• Provide systematic training and implement business plans on ethical practice.	We have established policies on Personal Data Governance, Securities Dealing and Handling of Confidential and Price-sensitive Inside Information to ensure our commitment to upholding high standards of business ethics across our operations and promoting equitable and inclusive societies for sustainable development.
The Community	3 GOOD HEALTH A QUALITY EDUCATION 4 EDUCATION 1 EDUCA	• Engage with local schools and non-profit organisations to promote cognitive skills and sponsorships.	We have established a Sustainability Policy to consider relevant sustainability initiatives and programmes based on the needs of the place where we operate. Our Corporate Communications Policy also included a framework for handling incoming requests for corporate donation and sponsorship activities that positively impact community development.

Materiality Assessment

Understanding and meeting our stakeholders' expectations are essential to our business's success in a constantly changing world.

The Group identifies the most relevant sustainability aspects on an ongoing basis for reviewing its business strategy and to define the contents of the Group's public disclosures.

Our most recent materiality assessment was completed in 2020 and the results reflected the most important issues raised by our stakeholders. Please see the ESG Report section of our Annual Report 2020 for more information on the materiality process.

To align our business operations with UNSDGs that the Group identifies with, we have included anti-corruption and business ethics as our new material issues during the year.

The material sustainability issues identified include:1

	Technology Platform and Investments	Media Business
	Mobile Internet/Social Network	Publishing/Advertising
Environment		
Operational Eco-efficiency	\checkmark	\checkmark
Use of Resources		\checkmark
Talent		
Human Capital Development	\checkmark	\checkmark
Operations		
Anti-corruption	\checkmark	\checkmark
Business ethics	\checkmark	\checkmark
Customer Privacy	\checkmark	\checkmark
Data Security	\checkmark	\checkmark
Intellectual Property Protection	\checkmark	\checkmark

In addition to the above, the Group also considers sustainability investment as an important part of the Group's sustainability initiatives.

¹ Due to recent business arrangements, our scope of reporting will not cover business units and their business activities that the Group has no management control over.









TOM Group considers employees as our greatest asset and strives to create a diverse, inclusive workplace where talents can thrive. We are committed to protecting the legitimate rights and interests of our employees through sound workplace health management, comprehensive training and career development and a host of other incentives. We also provide them with a safe, inclusive and caring workplace.

Talent Attraction and Recruitment

Given the ever-changing media and technology developments, it is essential to equip our employees with the knowledge and skills to excel in their respective roles. TOM Group strives to provide our employees with support and opportunities to foster a positive working environment. We also emphasise diversity in the workplace and improve our recruitment and retention strategies to attract the right talent.

TOM Group provides a combination of attractive remuneration, equal employment opportunities and a supportive workplace to retain and motivate talent. With approximately 1,200 employees from our operations in Greater China, it is critical for the Group to understand the needs and concerns of our employees to nurture a more engaged workforce.

Our workforce's loyalty and sense of belonging to the Group can be traced to the fair, just and non-discriminatory employment practices we implement across the board. As a considerate and responsible employer, we uphold the following policies to protect the legitimate rights and interests of our employees:



Policy and Guideline	Expectations and Requirements
Employment Policy	• Adopts equal employment opportunity policies and maintaining programs so that employees are hired, promoted and assigned on the basis of their skills and abilities to do their jobs; and
	• Non-discrimination policy continues throughout an employee's career and applies to all employee relations matters, including placement, transfer, promotion and compensation.
Human Rights Policy	 Prohibits the use of any form of child labour or forced labour, including prison labour, bonded labour, any form of slavery and any form of human trafficking;
Sustainability Policy	• Provides a positive work environment that values the wide-ranging perspectives inherent in its diverse workforce and fosters individual growth and achievement of business goals;
	 Provides a positive work environment where people can grow and offering a wide range of training and development programs and interest courses and activities;
	• Ensures internal equity and external competitiveness of staff remuneration and recognition; and
	 Provides a safe workplace for all its employees.

E HOW WE WORK

Recruit and retain talent

TOM Group's ability to reach the pinnacle of excellence depends on our employees' performance at every level. We support our employees extensively to facilitate their professional and personal growth and retain our top talents to further our long-term business goals.

Understanding staff retention risks and implementing strategies to reduce our talent attrition rate are integral to our continuing business success. High employee turnover not only increases a company's operational costs, which also affects its revenue, productivity and customer experience. Besides, successful staff retention will minimise the need to waste productive time screening, interviewing and training new candidates to fill the vacant positions.

We recruit and retain talents under the guidance of established Group policies and mechanisms. Foremost among them is our merit system, in which our employees are hired, paid, promoted and rewarded for their job performance, with a range of objective key performance indicators to assess how they fare.

In addition, our compensation packages are benchmarked against the market salary level for comparable positions and are subject to regular adjustments to maintain our competitive advantage. Aside from competitive pay, our employees receive an attractive benefits package that includes health insurance, free medical care, paid annual leave, and retirement pension to keep them motivated and valued. Our *Employment Policy* highlights several major *Salary Policy* objectives, including:

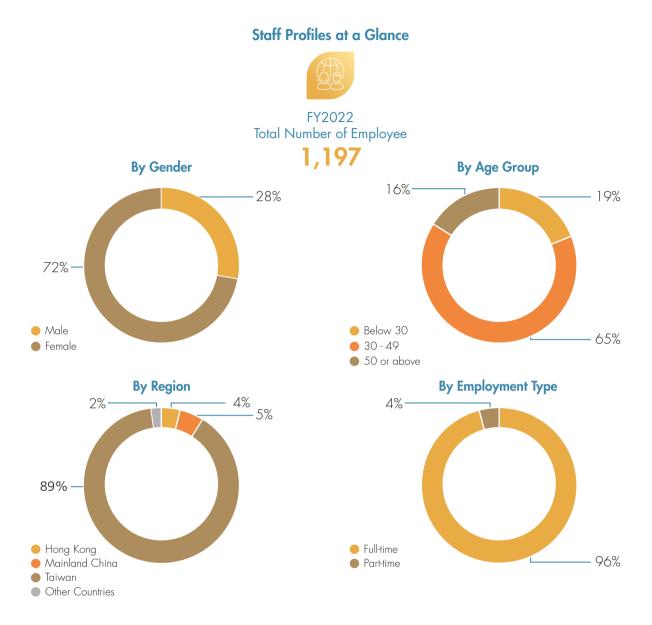
- Ensure that the salary structure is competitive in the marketplace;
- Reward staff in accordance with the value of their contribution as measured by job worth and performance;
- Motivate staff to make full use of their abilities and to develop their potential and strive to achieve the objectives of their jobs and of the Division; and
- Provide staff with an opportunity for continuous career growth.

To attract the right talent, our Social Network and Publishing Groups have implemented talent recruitment incentives for key positions to solicit referrals from our staff. A referral bonus is awarded to employees who have helped the Group recruit the right candidates.

In addition, our Mobile Internet Group has finetuned its strategic workforce planning, where the recruitment channels are evaluated to ensure job vacancies in the Group are filled rapidly with qualified candidates and our recruitment budget is used more efficiently.







Employee Health and Safety

TOM Group places high importance on the health and safety of our employees. We have implemented several measures to increase our employee's safety awareness and minimise the risks of hidden hazards at work to attract talent and retain an experienced workforce. Despite the best preventive efforts, accidents and even death may occur, and the Group's management and staff must be extra-vigilant at all times. Fortunately, there are many ways we can reduce the risk of workplace injuries and prevent them with comprehensive safety plans and precise execution.

Since the outbreak of the COVID-19 pandemic, we have consistently made employees' health and safety our top priority. The Group has introduced a regimen of protocols and measures to keep the pandemic at bay aside from following government requirements.

OUR COMMITMENT

We are committed to offering our employees and other stakeholders a safe working environment. *Health and Safety Policy* is formulated to provide a safe and supportive work environment that complies with all relevant laws and regulations in which we operate.

Our *Health and Safety Policy* highlights several major health and safety commitments, including:

- Complying with all applicable laws and regulations in the relevant jurisdictions;
- Meeting industry-specific standards or referencing relevant best practices;
- Adopting local or international health and safety guidelines for goods and services purchased;
- Maintaining a safe working place;
- Providing employees and contractors with guidelines or training and development specific to their job requirements;
- Assessing the health and safety performance of contractors and suppliers on a regular basis;
- Engaging employees and contractors through information sharing and programmes to improve their health and wellbeing; and soliciting feedback for continuous improvements;
- Monitoring and reporting health and safety performance;
- Providing adequate resources to implement with the Policy; and
- Enforcing the implementation of the Policy with regular reviews and internal audits.

HOW WE WORK

Protecting our employees' physical health

As employee health and safety is our foremost concern, we have taken a series of proactive measures to protect our staff in the wake of COVID-19 pandemic. Not only are staff members of our corporate office provided with facemasks, sanitisers and disinfectants, we have also stepped up hygiene and cleaning regimens at the workstations and common areas to curb coronavirus spread. During the year, our Group raised employee awareness on pandemic prevention and control through inhouse circulars and staff training.



Company-wide insurance coverage is provided to our permanent staff to ensure their free access to medical services for work-related and occupational ailments. In our Group, comprehensive healthcare services, including annual health check-ups as well as health awareness and safety training, are made available to full-time employees.

Pursuant to the Labour Health Protection Regulation in Taiwan, our Social Network and Publishing Groups have hired medical specialists to provide health consultation services to employees. In the year of 2022, 453 health consultations were conducted and 116 physical injuries were treated.



Work-related fatalities in the past three years

Lost days due to work injuries

(2021: 75)

Supporting mental wellbeing

We seek to protect the mental and physical wellbeing of our staff during the pandemic. Like many other businesses, we have introduced work from home arrangement for part of our workforce and provided flexible work options when necessary. In addition to the ultimate goal of precautions against disease spreading, these initiatives also ease our employees' stress and anxiety arising from COVID-19 disruptions and enable some employees with caregiver roles at home to balance work and home responsibilities during the special arrangement period, especially caring for their children and elderly dependents.

Cognisant of the pandemic's impact on mental wellbeing, our Social Network and Publishing Groups held health awareness training for their employees, teaching them ways to alleviate stress and anxiety, prevent infection from COVID and remain aware of its long-term health effects. A staff wellness workshop led by fitness coaches from the Occupational Safety & Health Council was conducted to teach staff members in our corporate office effective ways to maintain mental wellbeing.



Development and Retention

📃 RATIONALE

TOM Group believes a skilled and agile workforce is central to business sustainability. Therefore, we have offered different training initiatives to equip our employees with the requisite skills and capabilities to perform their work in line with Company's expectations. This has enabled us to maintain a strong pool of versatile talents to meet industry competition, overcome a potential skills deficit and lower staff turnover.

Despite growing training costs, we remain committed to upskilling and reskilling our employees intensively and regularly, enabling them to stay ahead of the technology curve by participating in course programmes and workshops, both general and customised to specific occupational needs. We believe our investments in employee development are worthwhile and will translate into higher productivity and create additional value for our customers and shareholders.

Under the Group's *Employment Policy*, every department or division takes responsibility for training their respective employees and teaching them job-specific technical and business skills. We have organised course programmes, seminars, workshops and special training that is offered on an as-needed basis, to ensure our employees are prepared to function competently in their specific roles.

E HOW WE WORK

Induction programme

TOM Group runs a mandatory induction programme to welcome newly recruited employees and introduce them to the Company's business operation, policies, objectives and culture. The orientation process is designed for new hires to build connections with each other across departments and learn the general skills and knowledge to make them successful at work.

Skill-based training

We also implement training and development programmes to educate our employees on the latest skills and knowledge they need to match job requirements. Such an initiative is calculated to promote staff mastery of general abilities – ranging from leadership to communication, time management and more - in addition to task-specific technical expertise. In 2022, our Social Network and Publishing Groups launched a series of both inhouse and external employee development programmes with the aim of immersing them in the following skills:

Leadership	Project Management
Teamwork	Compliance
Presentation Skill	Marketing
Occupational Health	Product Development

Provided over **10,410** hours of training and development for employees (2021: 5,435 hours)

The training courses and events are intended to broaden the horizons and exposure of our employees to new knowledge and skills they need to learn in order to move through different career phases and up the corporate hierarchy at the Group.

We encourage our frontline staff to take part in external training programmes hosted by our clients. Participation in such training will enhance their client-facing skills and capacity to improve customer service delivery. Selected staff members of our Advertising Group took part in three external training sessions held in Guangzhou last year. In turn, employees in our Advertising Group conducted self-learning to improve their work competence and performance, individually and collectively.

Succession Planning

Succession planning is undertaken in the Group to identify important positions in the organisation and create a talent pipeline, preparing experienced and high-performing employees to fill key vacancies as their predecessors retire or move on.

Our Social Networking and Publishing Groups run management training sessions to support supervisory-level staff to develop and hone their leadership skills and improve their confidence and knowledge in taking up key managerial positions. In 2022, total of 77 supervisors participated in these training sessions.

Workplace Wellbeing

The Group provides an inclusive work environment catering to employee needs and wellbeing. Occupational health and safety measures are constantly reviewed and updated to ensure the safety and health of our employees and keep them satisfied and engaged at work. We have also fostered a diverse, inclusive workplace to increase retention, engagement and productivity of our employees, by treating them with respect and empathy, allowing them to express their feedback and views freely and creating opportunities for them to succeed.

OUR COMMITMENT

As a responsible employer, we empower our employees and provide a positive work environment where they can thrive physically, mentally and professionally. The Group also implement multiple initiatives to encourage a work-life balance culture.

Family-friendly initiatives

The Group considers it a priority to support employees with policies, initiatives and flexibility needed to maximise their work-life integration. This has led to stronger engagement and significant sense of fulfilment with our staff and along with that, stronger business results.



To foster an empathetic workplace, we have rolled out several family-friendly initiatives to help our people balance career and family responsibilities by providing paid time-off for marriage and compassionate reasons, in addition to the annual leave that all employees are entitled to. Full-time staff members of the Group in Taiwan are also entitled to up to seven days of family urgency leave per year. Their performance review and full-attendance bonus remain unaffected when they exercise the right to consume this casual leave. In 2022, 15 employees from our Taiwan-based office took family urgency leave totalling 571 hours.



The COVID-19 pandemic has prompted us to introduce flexible working arrangements, including working from home, to reduce exposure of our colleagues to infection risks and limit virus spread. Employees in our Social Network and Publishing Groups can take time off work to look after their children during school closures induced by pandemic, without losing their jobs or having to face disciplinary action.

In line with the Act of Gender Employment, full-time staff of our Social Network and Publishing Groups in Taiwan are entitled to a discounted rate for childcare services, made possible by the Group's collaboration with educational groups.

Diversity and inclusion

TOM Group is convinced that diversity makes us more successful as a company. This is because diversity helps us expand our viewpoints and serves as a driving force behind creative ideas and innovations. We have promoted an inclusive working environment in which our employees can develop, make optimal use of their talent and express their opinions fearlessly — regardless of their age, gender or any other characteristic that relates to diversity. We promote equal opportunity in the workplace. The Company will continue to focus on achieving diversity and inclusion through workplace practices. Female representation at the Company is above the market averages, with 28.6%, 47% and 72% being the female ratios at the Board level, the management level and the overall workforce, respectively. The Company targets to maintain its female representation at least above-the-market average across the various seniority levels. The Company also aims to foster a culture of inclusion by encouraging employees to contribute ideas, share feedback and engage through, for example, its employee engagement surveys. The Company will continue to ensure gender diversity in its staff recruitment practices and is committed to providing equal opportunities in training and career development for its female employees, so as to maintain a pipeline of potential successors to the Board to ensure gender diversity.

To better understand the perspectives at individual, team and organisational levels, the Company has established and conducted our employee engagement survey during the year. We have also undertaken different follow-up actions, including holding workplace wellness activities, with the aim to facilitate a more positive and engaged workforce.



Regulatory Compliance

The Group has established preventive, monitoring and controlling measures to ensure compliance with relevant employment and labour laws and regulations. The Group is not aware of (i) any non-compliance with laws and regulations relating to employment and labour practices, occupational health and safety that have a significant impact on the Group; or (ii) any incident that has a significant impact on the Group relating to the use of child or forced labour during the reporting period. Protecting the Environment





2025 Targets

Central to our model of sustainable business is a responsible approach to protecting the environment and natural resources we all depend on. While we continue our role as a technology and media company listed on the Main Board of the Hong Kong Stock Exchange, minimising our carbon impact, conserving natural resources and arresting the effects of global warming are equally vital to our long-term success. In view of these goals, we firmly adhere to the environmental laws and regulations in the jurisdictions where we operate, combined with the policies, practices and specific targets we have put in place to significantly address the issues of climate change, clean energy and resource usage by 2025.

Focus area	Why it matters	2025 Targets	2022 Status
	Our data centres account for more than 80% of our total energy consumption and are a focal company of our energy efficiency efforts.	Increase Energy Star Certified server to 90%.	3% of servers have been upgraded. Currently, 60% of the servers were Energy Star Certified.
		Increase Energy Star Certified network equipment to 85%.	4.6% of network equipment have been upgraded. Currently, 78.6% of the network equipment was Energy Star Certified.
Climate		Increase Energy Star Certified office computers to 98%.	1.7% of computer have been upgraded. Currently, we have achieved the target, which 98.7% of the office computers were Energy Star Certified.
change & energy		Source IT equipment that are environmentally friendly.	 Ensure all IT procurement staffs follow the instruction of the Group's latest Green Procurement Standard
0,			 Budget application for IT procurement will only be approved if it complies to the Group's latest Green Procurement Standard
		Review IT procurement process regularly to incorporate sustainable procurement practices and establish sustainable procurement objectives.	EPA Energy Star included as a required component for the server, network equipment and office equipment.
Paper	Producing paper and publishing printed books requires cutting down trees and destroying forests. Replacing with e-books can help save millions sheets of paper and has less environmental impact.	Maintain to publish at least 20% of all book types electronically.	Published 44% of all book types electronically.
Packaging	A substantial source of our waste comes from the packaging materials used to protect the magazines and books when transporting them.	Aim at minimising the usage of virgin plastic by targeting to use a minimum of 80% recycled plastic content in plastic packaging by 2025, if supply allows.	Included in our procurement procedure to select suppliers who use recycled plastic content in plastic packing. Preference will be given to suppliers who use at least 50% recycled plastic content.

Operational eco-efficiency

TOM Group recognises the need for and importance to become more resource-efficient across our operations. We have implemented different policies and initiatives to encourage our customers, employees, suppliers and business partners to join us in building a greener operation.

In striving to protect the environment and increase energy efficiency, we aim to minimise our environmental impact and become more eco-friendly without compromising productivity. This guiding principle aligns our investment decisions with environmental sustainability. We also seek to raise the environmental awareness of our employees and suppliers, encouraging them to embrace our eco-efficiency targets for 2025.

Though our printing operation is far from polluting, we are committed to assimilating green practices into the Group culture, such as making sustained efforts to improve resource efficiency and reduce our carbon footprint. Rather than going it alone, we collaborate with suppliers, business partners, customers, and independent third parties to bring our green vision to life.

Environmental protection and eco-efficiency are seamlessly integrated into our routine operations through policies and accountability mechanisms that have been put in place to satisfy official green regulations. Besides keeping up with changes in the regulatory environment, our management ensures that the Group's compliance and regulatory professionals are sufficiently trained and knowledgeable of the most updated regulations, benchmarks and processes in order to carry out their responsibilities effectively. Our *Environmental Policy* highlights the Group's goals and efforts to implement eco-efficiency in our daily operations, including:

- Increase the usage of innovative and energy-efficient technology in the Group's operations to reduce energy consumption arising from day-to-day operations, such as efficient lighting and controls, HVAC upgrades and data centre infrastructure improvements.
- Track and monitor the use of energy across the Group's operations.

Our Group has established environmental guidelines for all its employees to follow in conserving energy and other natural resources and utilising them more efficiently.

Our employees in Publishing Group, for example, are required to turn off air conditioners if they are the last to leave the office. Supervisors are tasked with monitoring these actions to prevent energy waste. They can only apply for after-hours air conditioning if more than ten of them work overtime simultaneously.



LED luminaries are currently and increasingly used at the workplace and other selected areas. These lightings will eventually replace traditional fixtures, which use much more energy. For this reason, our Taoyuan warehouse in Taiwan has been outfitted with LED lightings to cut energy usage and cost.



We select technical equipment with a long service lifespan and energy-efficient features for procurement. Devices that malfunction will be repaired for future use or donated to charitable organisations, while those that are beyond repair will be disposed of properly.

For our corporate office, we are procuring IT equipment with Grade 1 energy labels under the Mandatory Energy Efficiency Labelling Scheme (MEELs), to ensure that we use the most energy-efficient electronic appliances in the market.

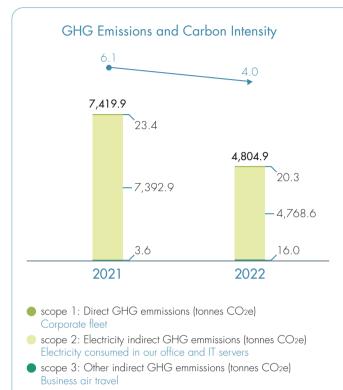
Greenhouse Gas (GHG) and Energy Consumption Performance

Most of the Group's carbon emissions originate from the daily use of office, IT and hardware equipment from our data centres that support our businesses and their internal use as well as the industrial printers of our Publishing Group.

In 2022, the Group's operations generated 4,804.9 tonnes of carbon dioxide equivalent ("tCO2e"). Among the Group's GHG emissions, we generated 4768.6 tCO2e from electricity consumption, in which Scope 2 emissions contribute to 99% of our total annual carbon emissions. In addition, the increase of Scope 3 emissions was attributable to the increase in air travel among our Publishing Group executives. During this year, the Group's GHG emissions declined 35% year on year mainly due to the changes in recent business activities. However, our scope of reporting will not cover business units and their business activities that the Group has no direct management control over.

Energy consumption in our offices and data centres decreased during the year owing to changes in recent business activities. Energy consumption in our data centres account for approximately 72.7% of the energy use in the Group's overall operations, generating 72% of our total GHG emissions in the process. Moving forward, the Group will continue to improve and upgrade our hardware and dedicated engineering services to optimise energy use and reduce our GHG emissions.

The Group's carbon intensity per headcount declined by 34% to 4.0 tCO2e per employee compared to last year. This was due to exclusion of the business units in which the Group has no direct management control in the reporting period.



← Carbon Intensity (tonnes CO₂e/ emeployee)

<section-header><text>

Use of resources

As environmental regulations become increasingly stringent, it is vital for the Group to integrate environmental sustainability into our business operations.

Currently, TOM Group relies heavily on paper materials, a woodfibre-based renewable resource, to produce all types of publications ranging from paper magazines to book products. Faced with the growing trend of deforestation and increasingly stringent government regulations on the usage of paper pulp and other natural resources, we plan to offer more sustainable publication solutions to enhance resource efficiency while reducing our operational expenses.





\bigotimes our commitment

As an environmentally responsible corporation, the Group sees the need to become even more resource efficient. We do not generate any hazardous waste due to our business nature. General non-hazardous office waste is disposed of through waste separation and recycling facilities provided by the property management companies of the office buildings in which our business units are located. Our Publishing Group's printers also handle wastepaper generated during the printing process in accordance with Taiwan's Waste Disposal Act.

Our *Environmental Policy* highlights several major waste management plans, including:

- Streamline procedures and processes to increase efficiency and reduce consumption of day-to-day operational inputs such as paper, electronic equipment and the like;
- Minimise the Group's waste footprint by recycling and reusing materials where possible and setting waste reduction and/or recycling targets where viable;
- Decrease the operational use of existing products while also sourcing from recycled or sustainable forest sources.

The Group procures paper materials from reputable suppliers in the market, including Chung Hwa Pulp Corporation ("CHP") and Dayeh . CHP's fine paper products are certified with ISO14001 – Environmental Management and are generally in line with international standards. Dayeh supplies UPM paper from the world's leading supplier that complies with the Restriction of Hazardous Substances and Registration, Evaluation, Authorisation and Restriction of Chemicals standards set by the European Union.



In accordance with Taiwan's Waste Disposal Act, wastepaper generated by our Publishing Group is subject to separation and recycling, along with other processing and disposal requirements. During the year, our Publishing Group also published 19 sustainability-related books to raise public awareness on sustainability and provide practical solutions to help make a difference in daily life.



During the Lunar New Year 2022 period, our corporate office participated in a red packets recycling campaign to promote waste reduction by collecting unused red packets for donation to charity organisations or for recycling.



Regulatory compliance

The Group has established policies and accountability mechanisms to ensure compliance with environmental regulations. The management is committed to keeping abreast of the latest regulatory developments and providing training for relevant personnel as needed. During the reporting period, the Group was not aware of any non-compliance with laws and regulations having a significant impact on the Group related to air quality and GHG emissions, waste discharge into water bodies and land and generation of hazardous and non-hazardous wastes.









To protect our business interests and reputation, we have been operating our business ethically, fairly and with integrity, to the highest standards of responsible conduct. This includes avoiding actual and perceived conflicts of interest, emphasising zero tolerance for corruption, and respecting the rights of all people and organisations we interact with. Our suppliers are expected to align themselves with our business values and ethics.

Business ethics and compliance

Maintaining business integrity and compliance is of utmost importance to the Group. We take a zero-tolerance stance against bribery, fraud and corruption as any unethical conduct jeopardises our stakeholders' trust and detrimental to business prospects. A strong ethical corporate culture is also key to improving business performance and customer loyalty. Therefore, the Group has relentlessly carried out prevention, detection, deterrence, and investigation of all forms of misconduct.

Business integrity is at the heart of our businesses. We have made immense efforts to cultivate trust with our stakeholders, including customers, advisors, partners, suppliers, colleagues, regulators and other community members. Enduring trust with stakeholders is fostered by consistent lawful operation, honest and transparent delivery of what have been promised and doing what is morally right. Hence, we have gradually built a strong ethical culture across our operations, where we abide by the laws and uphold the highest ethical standards without compromise.

The Board has the ultimate oversight and responsibility over the Group's adherence to ethical standards. The Group's Executive Director is responsible for ensuring the effective implementation , monitoring and investigation of any fraudulent or bribery activities committed within our organisation.

In addition, the Group has clearly outlined our expectations and requirements through the relevant policies and guidelines we have instituted as shown in the table below.

Corporate Policy and Guideline	Expectations and Requirements	Applicable to
Code of Conduct	• Promotes honest and moral conduct, including ethical handling of actual or apparent conflict of personal and professional interest in employees and other stakeholders.	All employees
Anti-Fraud and Anti-Bribery Policy	• Prohibits improper payments, kickbacks and any form of bribery.	All employees
Policy on Appointment of Third-Party Representatives	• Provides guidelines on the proper controls in engaging third-party representatives.	All employees
Supplier Code of Conduct	 Provides guidelines to induce compliance to items in the Code and broader improvements of sustainability practices and performance. 	All suppliers
Policy on Securities Dealing and Handling of Confidential and Price-sensitive Inside Information	 Provides guidelines on handling of confidential information and price-sensitive inside information. 	All employees
Competition Compliance Policy	 Provides a framework to ensure the Group's operation compliance with the applicable legislation on a country-by- country basis. 	All employees
	 Develop a consistent approach to ensure that, regardless of the location of our Company's operation, employees will continue to apply business practices attuned to our global reputation and standards. 	
Policy on Financial Management and Procedures	• Outline basic financial management policies and procedures of the Group.	All employees

Anti-corruption

Integrity and transparency are among the Group's core values and we take corruption seriously as it is considered a fundamental breach of our *Code of Conduct*. Under the Code, the Group enunciates a zero-tolerance stance against graft. We assist our staff in recognising and avoiding the circumstances that may lead to or give the appearance of corruption and other types of misconduct.

We have provisions dealing with:

- Kickbacks
- Political and charity contributions
- Facilitation payment
- Gifts and hospitality
- Goods and services procurement

Integrity and anti-corruption measures are emphasised in our *Code of Conduct* and the induction training that our new employees undergo to familiarise them with the Group's clean culture. Our key staff have been briefed on approvals, commercial aspects, procurement and other facets of our fight against corruption. In 2022, our Group organised two anti-corruption and anti-bribery refresher training sessions for all staff to maintain a high degree of awareness against misconduct. The relevant policies are always accessible for staff reference on the Group's intranet.

> of our directors and staff attended anti-corruption training

Our director overseeing the Group's anti-corruption policies and efforts have been staying updated on current corporate issues, risks, and graft prevention initiatives, including our whistle-blower programme, through regular participation in the related training and exposure to the relevant reading materials. It is our general policy to avoid donating to any political association or individual politician, in support of any political cause.

In 2022, we did not receive any report or complaint on bribery, extortion, fraud or money laundering that has a material effect on our consolidated financials.

Whistle-blower programme

The Group strictly follows our *Code of Conduct*, by which a whistle-blowing mechanism has been established. Our staff and third parties, including contractors and suppliers, are encouraged to promptly report incidents of actual or suspected fraud, corruption or other forms of unethical conduct to the Group through this established channel. It is also a tool for reporting cases like discrimination, unfair dismissal, victimisation, or unwarranted disciplinary action.

We will carefully examine each allegation made, documenting, investigating and reporting all breaches to the Board. Substantiated conduct violations will result in disciplinary action, including the termination of employment.

Whether or not the whistle-blower chooses to remain anonymous, all reports received through the mechanism are taken seriously and thoroughly probed. Unless we are compelled by law to disclose, information received from a whistle-blower will be held in the strictest confidence. We do not tolerate any retaliation against informants within the Group. Informants will be protected from possible retaliation, such as unfair dismissal, victimisation or unfair disciplinary action.

A set of internal escalation channels is in place and pertinent to our operational needs. Suspected breaches are documented and reported to the Group Finance Department every quarter. We have established a *Whistleblowing Policy* to guide the reporting of improprieties in financial reporting, internal control or other matters.

Grievance management

Any grievances raised by internal and external stakeholders are redressed and resolved transparently. It is a key element of our engagement process with stakeholders, providing opportunities to prove that their concerns have been heard, valued and acted upon. The Group is always willing to collaborate with our stakeholders in devising the optimal solutions.

All grievances will be examined meticulously and we do not tolerate any form of retaliation against the complainants. As stated in our *Employment Policy*, our employees are free to raise their concerns to the management without fear of reprisals.

Our Social Network and Publishing Groups have established a framework with escalating channels for investigating complaints of sexual harassment at the workplace since 2012. Reporting hotlines and mailboxes have been set up and separated based on the complainant's gender.

Cybersecurity and customer privacy

Ever since the digitalisation trend emerged, every individual, business and organisation have been at risk of cyber-attacks and data leakage. Nowadays, cybersecurity has become one of the greatest concerns when purchases are made online. As a part of the technology and media sector, it is always the Group's fundamental priority to safeguard our operations and systems, networks, and customer data from all cyber incidents. We have gained customer trust in both the delivery of next-generation connectivity and protection of customer privacy.

To ensure customer data safety, we review and improve our data management practices regularly and are ready to raise the bar regarding cyber security standards. These measures have effectively protected our IT system from malicious attacks or breaches, ensuring that our data is handled with the highest level of care and confidentiality.

To make sure all end users and networks within our organisation meet the necessary IT security and data security criteria, we have compiled a comprehensive set of rules, policies, and procedures in our *Information Security Policy*. The fundamental principles for information confidentiality, integrity and availability are also clearly laid out and applied across the Group.

The *Information Security Policy* is founded on these key principles:

- All parties seeking information access will be verified according to their integrity level, technical competence and need-to-know basis.
- Related employees are required to have a full understanding of the Group's information security policies and procedures and agree to perform their work duties accordingly.
- Business partners, suppliers, customers and associates of TOM Group must be made aware of their information security responsibilities with reference to specific contractual terms and phrase that define their relationship with the Group.

We have also formulated a *Policy on Personal Data Governance* to safeguard the personal data of employees and customers, in compliance with applicable data security laws.

The Policy on Personal Data Governance has outlined the follows:

- Personal Data should only be kept for as long as is necessary for the purposes for which it is being used. Guidelines around document retention periods should be issued by each BU to the relevant management and staff.
- Each BU is required to implement appropriate procedures to ensure that Personal Data is processed fairly and lawfully in accordance with the Data Privacy Principles and Applicable Data Protection Laws.

TOM Group is committed to promptly identifying, responding and recovering from IT security incidents. To promote resilience of our cyber security system, we have adopted the integration of people, technology, and processes.



We recognise the inherent cyber risks of the technology and media industry and seek to integrate cyber security into the awareness and work processes of our employees. The Group continuously enhances our capacity to protect ourselves while swiftly and effectively responding to any malicious manoeuvre targeting our networks and systems. Risk-focused plans are also made to build our cyber resilience, minimise disruptions and enable continuity of our business activities and operations in the face of cyber breaches or attacks.

We will continue to increase our emergency preparedness and stay vigilant round the clock. More cyber-security measures will be implemented while integrating people, technology and processes.

Policy and management

In the event of a security breach, the Group stands ready with a clearly defined standard operating procedure to address any security lapse, while controlling data use and protecting customer data privacy.

Our Groups has also developed the following policies to operationalise our cyber security programme:

Cyber-security related policies	Expectations and requirements
Code of Conduct	• Lays down the guidelines for appropriate IT-related conduct and action at the Group and all its business entities.
Policy on Personal Data Governance	 Provides guidelines on network and user management.
	 Provides guidelines on personal data security, data audit and other personal data-related safety maintenance issues.
Information Security Policy	 Describes policies on creation, communication, storage, transmission and destruction of information within the Group.

Risk assessment

New critical risks have arisen from increasing reliance on information technologies and IT systems in business operations. It is therefore a significant matter to conduct cybersecurity risk assessments, which will allow us to identify vulnerabilities in our IT systems, estimate and prioritise our information security risks.

At least once annually, we engage an external security consultant to conduct an independent third-party assessment on the security of our IT systems and platforms. Leveraging on third-party cybersecurity frameworks, compliance or regulatory standards helps benchmark our security controls against time-tested industry standards and best practices and identify potential room for system enhancement. Another objective of this exercise is to assess whether our risks have been properly monitored and managed.

As part of our cyber risk management process, the Group's Social Network Group has formulated a standard escalation procedure for immediate response to suspected or actual cyber incidents. It clearly outlines the reporting, addressing and reflection process. Drills are also carried out regularly to maintain the vigilance of employees through simulation of different IT incidents. Furthermore, our external cloud service provider has attained ISO/IEC 27017 and ISO/IEC 27018 accreditations for our information security management system. During the year, our Mobile Internet Group's cloud system has also been audited by an external auditor to ensure its compliance and credibility.

Employee training

It is important to ensure a high level of cyber security awareness among our employees. We equip them with practical knowledge about protection against cyber-attacks, breaches and data leaks that might expose their personal information or that of our customers.

In 2022, our Group hosted induction training for all new staff members, introducing them to our data security system within the management system, with a view of raising their cyber mindfulness and further ensuring our IT system's secure protection.

Customer data privacy

The Group acknowledges the importance of managing customer data responsibly. This is because our customers have entrusted us with their personal information, and it is the Group's obligation to strictly enforce its account authorisation management requirements to safeguard customer data collected through our service interactions.

The formulation of our *Privacy Policy* underscores the processes undertaken to protect the security of website browsers and ensure the confidentiality of our customers' personal data. All customer data gathered from the Group's online platforms and marketing activities are strictly handled in accordance with local regulatory requirements and only accessible to authorised personnel.

The Group's data governance and privacy best practices are regularly reviewed. Our staff members have acquired the practical skills to handle customer information properly and safeguard data privacy through training and workshops, adhering to our Code of Conduct for Information Technology usage. The Code provides clear guidance on the protection of information, authorisation of use, acceptable use, intellectual property rights and copyright, physical security, security of log-on information and violation.

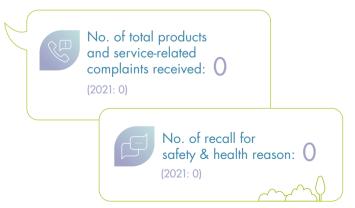
Our Group has formulated relevant policies to safeguard the personal information of our customers and employees. The *Information Security Policy* and *Policy on Personal Data Governance* outline the requirements and expectations of the Group on robust information and data security. During the reporting period, there had been no significant cases of non-compliance concerning the breach of customer privacy or loss of customer data.

Customer feedback management

TOM Group values customer opinions as demonstrated by our dedicated approach to managing customer feedback. We value customer feedback for improving our various operation procedures, products and service quality and have implemented initiatives to collect and analyse the opinions, complaints, criticisms and suggestions of customers.

An online customer service platform has been established to collect feedback and provide timely responses to customer issues. Our Mobile Internet Group & Social Network Group's standard procedure is to address inquiries within 24 hours and respond within a week. Its technical support team follows through with any complaint or grievance received within half an hour, reflecting our aim to provide quality customer service and improve our feedback handling process and practices.

To enhance the quality of customer service, our Mobile Internet Group performs daily analysis and evaluation of customer complaints and regularly responds to frequently asked questions on its official account. Our Social Network Group also conducts weekly reviews on its satisfaction score to ensure customer needs are understood and met. A summary of reported complaints and relevant statistics including results of investigations and actions taken is presented to its customer service supervisors for review and verification regularly.



Intellectual property protection

Intellectual Property (IP) is fundamental to fostering creativity and innovation. The protection of ideas and efforts of product developers facilitates economic, social and cultural developments around the globe. The Group strongly focuses on protecting our key assets, including copyrights, patents, trademarks, and other IP forms, as they are the foundation of our success.

Concurrently, we pay equal respect to the IP rights of third parties and strictly forbid the unauthorised use of legally protected materials, including software, data, text, graphics, images, sounds, animations, and movies in our businesses.

Q OUR COMMITMENT

Our Code of Conduct for Information Technology Usage demonstrates the Group's resolve to protect IP with the formulation of guidelines to ensure intellectual property rights and copyright rules are incorporated throughout the Group.

It is also stated in our *Policy on Securities Dealing and Handling of Confidential and Price-sensitive* Inside Information that our employees are prohibited from using or disclosing confidential information in their possession other than during the proper course of their duties or with the necessary prior approval or authorisation obtained.

🗏 HOW WE WORK

We have registered trademarks and domain names across different jurisdictions to protect our intellectual properties. We are prepared to initiate legal proceedings if any infringement of our intellectual properties is discovered. Our policy has also incorporated anti-copyright infringement terms, demanding mutual respect for the intellectual property rights of us and all other parties. Our staff members are required to observe legal requirements governing the collection, possession, processing, disclosure, and use of personal data.

Our Social Network Group has inserted an intellectual property clause into its employment contract and supplier

contract to ensure that the Group owns the intellectual property created by its employees while on the job or provided by its suppliers during the contract period.

Supply chain management

TOM Group is committed to adopting responsible business practices and extending our broader influence, from suppliers to business partners, along our value chain. A sustainable supply chain can create long-term value for the Group and community members. Hence, we have embedded sustainability considerations into the essential sections of our supply chain and encourage sustainability efforts on their part. Through collaborative work with our suppliers and business associates, we spread sustainable business practices, promote environmental conservation, and deliver tangible social benefits to the regions we serve.

Q OUR COMMITMENT

Our Supplier Code of Conduct outlines our requirements and demands on human rights, employment practices, environmental impact, supplier diversity, conflicts of interest and other areas of responsible business operation, which apply equally to all our vendors and business partners. The Code has been developed factoring in ideas and policies of international charters and conventions such as The Universal Declaration of Human Rights (UDHR) and the ILO (International Labour Organisation)'s Declaration on Fundamental Principles and Rights at Work, adopted in 1988.

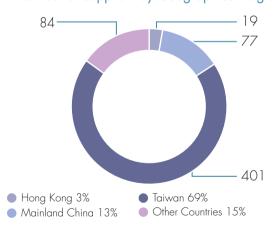
Some key highlights in our *Supplier Code of Conduct* are as follows:

 Supplier shall comply with all local Personal Data Protection laws concerning data security and privacy, and shall protect and safeguard TOM Group's and its customers' confidential assets and information. Any transfer or sharing of data must be done in a manner that protects such information from inadvertent or unauthorised disclosure and any disclosure must be in compliance with local and international laws. Business partners and suppliers must respect intellectual property rights, including patents, trademarks, copyrights and process designs, and safeguard TOM Group's confidential and proprietary information.

We have also drawn useful inspiration and ideas from the following policies to support enforcement of supply chain sustainability in TOM Group:

- Human Rights Policy we expect business partners and suppliers to embrace the principles of human rights protection.
- Modern Slavery and Human Trafficking Statement

 we object to modern slavery and human trafficking and have actively prevented their occurrences in our business or supply chains.
- Environmental Policy we have raised the awareness of suppliers and related stakeholders about environmental issues, eco-friendly practices and other environmental considerations.



Number of Suppliers by Geographical Region

Supplier screening and selection

The Group expects our supply chain partners to share our business values and sustainability commitment by upholding ethical conduct, minimising environmental impacts and implementing fair and just labour practices. Anti-fraud and anti-corruption clauses are inserted into our contracts to ensure potential suppliers and vendors know the Group's expectations and requirements well in advance. For example, all new suppliers of our Publishing and Social Network group are required to fill out a self-assessment questionnaire evaluating themselves on an array of sustainability criteria, including anti-discrimination measures, remuneration packages, prohibition of child labour, workplace safety and environmental performance.

Our new suppliers must comply with environmental regulations and labour standards to formalise business partnerships with the Group. The Social Network and Publishing Groups require its suppliers to perform self-audits and confirm their alignment with its *Supplier Code of Conduct* criteria. Supplier contracts will only be renewed when the Group is satisfied that the compliance obligations of vendors have been fulfilled.

Internally, we have created a hierarchy of authorities where procurement decisions are made and subject to a series of vetting procedures before reaching the appropriate level of authority for final approval. This regime has been put to practice across all the Group's business units.

Supplier performance evaluation

Regular supplier performance evaluation is crucial to maintaining a sustainable supply chain. Through the period of evaluation, the Group monitors and tracks our suppliers and contractors, assesses their sustainability progress, and determines whether a continuing partnership is justifiable. The supplier evaluation system also serves accountability as it ensures contract compliance, mitigates operational risks, minimises costs and promotes continuous enhancement in sustainability practices.

Regulatory compliance

The Group has placed high importance in relevant regulatory compliance concerning health and safety, advertising, labelling and privacy matters relating to products and services and methods of redress. The Group is not aware of any incidents of material non-compliance with laws and regulations concerning health and safety, advertising, labelling and privacy matters relating to products and services and methods of redress, that have a significant impact on the Group during the reporting period. Serving the Community







TOM Group strives to contribute to the betterment of society and foster collective advancement and harmonious relationships with the community.

Being socially responsible enhances the perception of our brand and our rapport and connections with potential clients from diverse stakeholder communities.

The Group is dedicated to supporting the community by addressing some of the world's toughest social and environmental challenges. We strive to utilise our products, services, technology, people and connections to deliver greater societal impact and drive positive change.

🞗 OUR COMMITMENT

TOM Group seeks to contribute to programmes that positively impact community development and reflect our values and sustainable objectives with a profound respect for all cultures and the unique social needs of different communities.

In the spirit of our *Corporate Communications Policy*, TOM Group actively backs initiatives which promote environmental wellbeing, education, public health, community services as well as the arts and culture.



Environmental protection

In May 2022, our Publishing Group organised the "2022 Taiwan Renewable Procurement Summit" which advocated carbon reduction and the use of renewable energy with its business partners and discussed the government's call to build a comprehensive green supply chain to achieve a sustainable future.



n to Global Net Zero Roadmap Forum 満碳定價策略:邁向全球淨零|前瞻論壇



Our Publishing Group also organised the "Carbon Pricing Strategy of Taiwan: Path to Global Net Zero Roadmap Forum" where industry professionals were invited to discuss the topic of "carbon pricing" and how to determine, collect, and utilise carbon charges promoted by the Taiwan government and industry to address the issues of green energy and energy efficiency.

To enhance children's environmental awareness and knowledge, our Publishing Group has published various story books hoping to cultivate young green action citizens with global vision and local care through online and offline reading.

Donation of advertising space

Cité Publishing Group, our Taiwan-based flagship Publishing Group, is actively involved in community service by donating advertising space to foundations and charitable organisations. During the year, it also partnered with World Vision Taiwan and organised the "Read for Love 2022" event, where celebrities were invited to tell stories to children from rural areas through online reading.





Fighting child illiteracy and education disparity

The Group has been organising regular book donation activities to promote healthy reading habits among people from different social backgrounds since 2005. During the year, the Company has donated various

children's books to the Child Helper Development Center Association and hopes to cultivate a fun-filled reading habit among children.





In 2022, Our Social Network Group partnered with Bjorgaas Foundation for the first time and invited 10 bloggers to promote the Foundation's Mid-Autumn Festival gift box to the public through article writing. The sales proceeds from the Mid-Autumn Festival gift box will be fully donated to Malawi, Africa. It will subsidise scholarships and educational grants for local children in financial need to receive school education and provide them with materials needed for formal schooling, such as textbooks and uniforms.

Community engagement

To help support disadvantaged groups in the community, our corporate office has encouraged its employees to participate in "Skip Lunch Day", "Dress Casual Day', "Green Carbon Day", and "Love Teeth Day" held by The Community Chest to help and bring hope to disadvantage group in the community.

In addition, to show care and support to the people affected by the epidemic, TOM Group also donated a series of anti-epidemic supplies, including highly protective masks, hand sanitizers, and rapid antigen test kits, via the Child Helper Development Center Association to those families in need.



About this **Report**

Reporting Period

As a purpose-driven organisation, TOM Group is issuing its second standalone sustainability report in the Group's sustainability disclosure journey, in which the Group is continuously looking to enhance reporting approaches as well as address the sustainability concerns of its stakeholders. This report covers the year from 1 January 2022 to 31 December 2022, unless otherwise specified.

Reporting Boundary

The information disclosed in the sustainability report covers our core and material operations in our Mobile Internet, Social Network, Publishing and Advertising Groups. These operations of ours span the cities of Hong Kong, Beijing and Taiwan in the Greater China region. But due to recent business arrangements, our scope of reporting will not cover business units and their business activities that the Group has no direct management control over.

Reporting Framework

This Report is prepared in accordance with the mandatory disclosure requirements and the "comply or explain" provision of the ESG Reporting Guide ("ESG Guide") contained in Appendix 27 to The Rules Governing the Listing of Securities on The Stock Exchange of Hong Kong Limited. The ESG Guide Content Index, which is printed on page 43-48, contains information about the extent to which the Group has applied the guide with cross-references to the relevant sections in this report.

This report should be read in conjunction with the Group's 2022 Annual Report, which offers a detailed overview of its financial performance and corporate governance in the past fiscal year, combined with the key policies published on the Group's official website.

Reporting Principles

The Group has applied the following reporting principles of the ESG Guide in preparing this Sustainability report:

- Materiality the Group focuses on matters that impact business growth and are of importance to our stakeholders. For more information, please refer to section of Materiality assessment.
- Quantitative information of the standards, methodologies, assumptions and/or calculation references and source of key conversion factors used on the key performance indicators ("KPIs") stated, wherever appropriate.
- **Balance** this report discloses information in an objective manner, aiming to provide stakeholders with an unbiased picture of the Group's overall sustainability performance.
- **Consistency** consistent methodologies are adopted when calculating the quantitative KPIs unless otherwise specified. Reasons would be provided for any restating of information published in the report.

Language

In case of discrepancy between the Chinese and English versions of the Sustainability Report, the English version shall prevail.

Definitions

Unless otherwise specified, capitalised terms used in this Sustainability Report shall have the same meanings as those defined in the Group's 2022 Annual Report.

Feedback

The Group welcomes feedback on this Sustainability Report, its approach to sustainability and performance. Please share your views at ir@tomgroup.com.

Environmental Data

Environmental Indicators	2022	2021	% Difference
GHG Emissions (tonnes CO2e) ³	4,804.9	7,419.9	-35%
Scope 14	20.3	23.4	-13%
Scope 2 ⁵	4,768.6	7,392.9	-35%
Scope 3 ⁶	16.0	3.6	340%
Carbon Intensity (tonnes CO2e/employee)	4.0	6.1	-34%
Energy Consumption ⁷ (GJ)	33,409.7	48,283.6	-31%
Direct Energy Consumption	269.3	305.4	-12%
Indirect Energy Consumption	33,140.4	47,978.2	-31%
Energy Intensity (GJ/employee)	27.9	39.4	-29%
Paper Consumption (tonnes)	5,369.1	5,918.6	-9%
Office paper	13.1	13.6	-3%
Paper for Publishing Business	5,356	5,905	-9%
Water Consumption (m ³)	24,454.5	25,122.3	-3%
Water Intensity (m ³ /employee)	20.4	20.5	-0.5%
Packaging Material (tonnes)	3.0	3.0	1%
Plastic packaging	3.0	3.0	1%
Air Emissions (kg) ⁸			
NOx	22.0	23.28	-5%
Particulate Matters	2.01	2.12	-5%
SOx	0.11	0.13	-12%

² The latest scope of environmental and social performance excludes business units in which the Group has no management control over in the reporting period. The change of scope is due to the changes in recent business activities.

³ Calculated with reference to "Guidelines to Account for and Report on Greenhouse Gas Emissions and Removals for Buildings (Commercial, Residential or Institutional Purposes) in Hong Kong" issued by the Environmental Protection Department (EPD) and the Electrical and Mechanical Services Department (EMSD) of the HKSAR Government.

⁴ Include diesel and petrol consumption by corporate fleet.

⁵ Emissions associated with electricity purchased are calculated based on the latest available emissions factors provided by the power companies.

⁶ Include GHG emissions related to business air travel.

⁷ The factors for converting the base units of different fuel types to gigajoule (GJ) are based on guidelines issued by HKEX.

⁸ The emission factors are based on guidelines issued by HKEX.

Social Data

Workplace Indicators	2022	2021
Employment		
Number of employees	1,197	1,224
By employment category		
Full-time	1,146	1,186
Part-time / Contract	51	38
Full-time employees by gender, age group and region		
By gender		
Male	322	361
Female	824	825
By age group		
Below 30	219	244
30-49	743	773
50 and above	184	169
By region		
Hong Kong	46	47
Mainland China	61	74
Taiwan	1,017	1,043
Other Countries	22	22
Full-time employee turnover rate (%) ⁹		
Total	32%	24%
By gender		
Male	43%	30%
Female	28%	22%
By age group		
Below 30	70%	50%
30-49	26%	19%
50 and above	13%	15%

 9 Employee turnover rate = number of turnover in the category/ total workforce of the category at the end of the reporting period x 100%.

Workplace Indicators	2022	2021	
Employment			
Full-time employee turnover rate (%) ⁹			
By region			
Hong Kong	26%	15%	
Mainland China	107%	76%	
Taiwan	29%	22%	
Other Countries	9%	0%	
Training and Development			
Average hours of training per employee ¹⁰	9.09	4.58	
By gender			
Male	8.76	4.14	
Female	9.22	4.78	
By employee category			
Manager grade or above	6.11	3.68	
General staff	9.28	4.64	
Percentage (%) of employees who received training ¹¹			
By gender			
Male	100%	100%	
Female	100%	100%	
By employee category			
Manager grade or above	100%	100%	
General staff	100%	100%	
Occupational Health and Safety			
Number of reportable injuries	7	7	
Number of lost days due to work injuries	48	75	

¹⁰ Permanent full-time staff. Average training hours = total hours of training received by employees / total workforce at the end of the reporting period.
 ¹¹ Permanent full-time staff including terminated employees who left the Group during the reporting period. Percentage of employees who received training = number of employees trained /total workforce at the end of the reporting period x 100%. The percentage of employees trained may exceed 100%.

Hong Kong Stock Exchange ESG Guide content index

Mandatory Disclosu	re Requirements	Page	Remarks
Governance Structure	 A statement from the board containing the following elements: (i) a disclosure of the board's oversight of ESG issues; (ii) the board's ESG management approach and strategy, including the process used to evaluate, prioritise and manage material ESG-related issues (including risks to the issuer's businesses); and (iii) how the board reviews progress made against ESG-related goals and targets with an explanation of how they relate to the issuer's businesses. 	p.4-8	-
Reporting Principles — Materiality	 (i) the process to identify and the criteria for the selection of material ESG factors; (ii) if a stakeholder engagement is conducted, a description of significant stakeholders identified, and the process and results of the issuer's stakeholder engagement. 	p.13; 39	-
Reporting Principles — Quantitative	Information on the standards, methodologies, assumptions and/or calculation tools used, and source of conversion factors used, for the reporting of emissions/energy consumption (where applicable).	p.39	-
Reporting Principles — Consistency	The issuer should disclose in the ESG report any changes to the methods or KPIs used, or any other relevant factors affecting a meaningful comparison.	p.39	-
Reporting Boundary	A narrative explaining the reporting boundaries of the ESG report and describing the process used to identify which entities or operations are included in the ESG report.	p.39	-

Subject Areas, Aspe	cts, General Disclosures and KPIs	Page	Remarks	
A. Environmental				
Aspect A1: Emission	S			
General Disclosure	 Information on: a) the policies; and b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to air and greenhouse gas emissions, discharges into water and land, and generation of hazardous and non-hazardous waste 	p.22-27	 Code of Conduct Environmental Policy Sustainability Policy Supplier Code of Conduct 	
KPI A1.1	The types of emissions and respective emissions data	p.40	-	
KPIA1.2	Greenhouse gas emissions in total (in tonnes) and, where appropriate, intensity (e.g. per unit of production volume, per facility)	p.26; 40	-	
KPIA1.3	Total hazardous waste produced (in tonnes) and, where appropriate, intensity (e.g., per unit of production volume, per facility)	-	The Group does not generate any hazardous waste in its operations.	
KPIA1.4	Total non-hazardous waste produced (in tonnes) and, where appropriate, intensity (e.g., per unit of production volume, per facility)	-	General non-hazardous office waste generated is disposed of through waste separation and recycling facilities provided by the property management companies of the office buildings in which our business units are located.	
KPI A1.5	Description of emission target(s) set and steps taken to achieve them	p.23	•	
KPI A1.6	Description of how hazardous and non-hazardous wastes are handled, and a description of reduction target(s) set and steps taken to achieve them	p.23	-	

Aspect A2: Use of resources			
General Disclosure	Policies on the efficient use of resources, including energy, water and other raw materials	p.22-27	 Code of Conduct Environmental Policy Sustainability Policy Supplier Code of Conduct
KPI A2.1	Direct and/or indirect energy consumption by type (e.g. electricity, gas or oil) in total (kWh in '000s) and intensity (e.g. per unit of production volume, per facility)	p.26; 40	-
KPI A2.2	Water consumption in total and intensity (e.g. per unit of production volume, per facility)	p.40	
KPI A2.3	Description of energy use efficiency target(s) set and steps taken to achieve them	p.23	-
KPI A2.4	Description of whether there is any issue in sourcing water that is fit for purpose, water efficiency target(s) set and steps taken to achieve them	-	While water use is not considered material for the Group, the Group does not encounter any issues in sourcing water.
KPI A2.5	Total packaging material used for finished products (in tonnes) and, if applicable, with reference to per unit produced	p.40	-
Aspect A3: The Envi	ronment and Natural Resources		
General Disclosure	Policies on minimising the issuer's significant impact on the environment and natural resources	p.22-27	Environmental PolicySustainability PolicySupplier Code of Conduct
KPI A3.1	Description of the significant impacts of activities on the environment and natural resources and the action taken to manage them	p.22-27	-
Aspect A4: Climate Change			
General Disclosure	Policies on identification and mitigation of significant climate-related issues which have impacted, and those which may impact, the issuer	-	 According to the materiality review, climate change is not material to the Group in view of business nature. Environmental Policy Sustainability Policy
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	-	

B. Social

Aspect B1: Employment			
 Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to compensation and dismissal, recruitment and promotion, working hours, rest periods, equal opportunity, diversity, anti-discrimination, and other benefits and welfare 	p.15-16; p.20-21	Code of ConductEmployment Policy	
Total workforce by gender, employment type, age group and geographical region	p.17; 41	-	
Employee turnover rate by gender, age group and geographical region.	p.41-42	-	
d Safety			
 Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to providing a safe working environment and protecting employees from occupational hazards 	p.17-19	• Health and Safety Policy	
Number and rate of work-related fatalities occurred in each of the past three years including the reporting year.	p.18	-	
Lost days due to work injury	p.18; 42	-	
Description of occupational health and safety measures adopted, how they are implemented and monitored	p.18-19	-	
Aspect B3: Development and Training			
Policies on improving employees' knowledge and skills for discharging duties at work. Description of training activities	p.19-20	-	
The percentage of employees trained by gender and employee category	p.42	-	
The average training hours completed per employee by gender and employee category	p.42	-	
	Information on:(a) the policies; and(b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to compensation and dismissal, recruitment and promotion, working hours, rest periods, equal opportunity, diversity, anti-discrimination, and other benefits and welfareTotal workforce by gender, employment type, age group and geographical regionEmployee turnover rate by gender, age group and geographical region.d SafetyInformation on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to providing a safe working environment and protecting employees from occupational hazardsNumber and rate of work-related fatalities occurred in each of the past three years including the reporting year.Lost days due to work injuryDescription of occupational health and safety measures adopted, how they are implemented and monitoredent and TrainingPolicies on improving employees trained by gender and employee categoryThe percentage of employees trained by gender and employee category	Information on:p.15-16;(a) the policies; andp.20-21(b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to compensation and dismissal, recruitment and promotion, working hours, rest periods, equal opportunity, diversity, anti-discrimination, and other benefits and welfarep.17; 41Total workforce by gender, employment type, and geographical regionp.17; 41Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to providing a safe working environment and protecting employees from occupational hazardsp.17-19Number and rate of work-related fatalities occurred in each of the past three years including the reporting year.p.18; 422Description of occupational health and safety measures adopted, how they are implemented and monitoredp.19-20Policies on improving employees trained by gender and employee ategoryp.142	

Aspect B4: Labour Standards				
General Disclosure	 Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to preventing child and forced labour 	p.21	 Human Rights Policy Modern Slavery and Human Trafficking Statement Supplier Code of Conduct 	
KPI B4.1	Description of measures to review employment practices to avoid child and forced labour	-		
KPI B4.2	Description of steps taken to eliminate such practices when discovered	-		
Aspect B5: Supply C	Chain Management			
General Disclosure	Policies on managing environmental and social risks of the supply chain	p.34-35	 Human Rights Policy Modern Slavery and Human Trafficking Statement Supplier Code of Conduct 	
KPI B5.1	Number of suppliers by geographical region	p.35	-	
KPI B5.2	Description of practices relating to engaging suppliers, number of suppliers where the practices are being implemented, how they are implemented and monitored	p.34-35	 Policy on Appointment of Third Party Representatives 	
KPI B5.3	Description of practices used to identify environmental and social risks along the supply chain, and how they are implemented and monitored.	p.34-35	-	
KPI B5.4	Description of practices used to promote environmentally preferable products and services when selecting suppliers, and how they are implemented and monitored.	p.23; 27	-	

Aspect B6: Product Responsibility General Disclosure Product Responsibility Policies and compliance Code of Conduct p.31-35 with relevant laws and regulations on health Policy on Personal Data and safety, advertising, labelling and privacy Governance matters relating to products and services provided and methods of redress KPI B6.1 Percentage of total products sold or shipped p.33 subject to recalls for safety and health reasons. KPI B6.2 Number of products and service-related p.33 _ complaints received and how they are dealt with. KPI B6 3 Description of practices relating to observing p.34 and protecting intellectual property rights. KPI B6.4 Description of quality assurance process and p.31-33 recall procedures. KPI B6.5 Description of consumer data protection and p.31-33 Information Security privacy policies, how they are implemented Policy and monitored. Policy on Personal Data Governance Aspect B7: Anti-corruption General Disclosure Information on: p.28-31 Code of Conduct (a) the policies; and Anti-Fraud and (b) compliance with relevant laws and Anti-Bribery Policy regulations that have a significant impact Policy on Appointment on the issuer relating to bribery, extortion, of Third Party fraud and money laundering Representatives KPI B7.1 Number of concluded legal cases regarding p.30 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 p.30-31 Whistleblowing Policy whistleblowing procedures, how they are implemented and monitored KPI B7.3 Description of anti-corruption training provided p.30 to directors and staff Aspect B8: Community Investment General Disclosure Policies on community engagement to Corporate p.36-38 understand the needs of the communities where Communication Policy the issuer operates and to ensure its activities take into consideration the communities' interests KPI B8.1 Focus areas of contribution (e.g. education, p.36-38 environmental concerns, labour needs, health, culture, sport)

Resources contributed (e.g. money or time) to

the focus area

p.36-38

KPI B8.2

TOM Group Limited

Rooms 1601-05, 16/F China Resources Building 26 Harbour Road Wanchai, Hong Kong

Tel : (852) 2121 7838 Fax : (852) 2186 7711

www.tomgroup.com

