

# WINTO GROUP (HOLDINGS) LIMITED 惠陶集團(控股)有限公司

(Incorporated in the Cayman Islands with limited liability)  
(於開曼群島註冊成立的有限公司)

Stock Code 股份代號: 8238



**2021** 環境、社會及管治報告  
ENVIRONMENTAL, SOCIAL AND  
GOVERNANCE REPORT

## SCOPE AND REPORTING PERIOD

This is the sixth Environmental, Social and Governance (“ESG”) report by the Group, highlighting its ESG performance, with disclosure reference made to the ESG Reporting Guide as described in Appendix 20 to the GEM Listing Rules and Guidance set out by The Stock Exchange of Hong Kong Limited.

The Group is principally engaged in (i) sales and distribution of publications, and the sales of print and online advertising spaces and provision of advertising design and related production services, (ii) sales of billboard advertising spaces and provision of advertisement sourcing agency services, and (iii) promotion of products and services by organizing exhibitions and shows. This ESG report covers the Group’s overall performance in two subject areas, namely, Environmental and Social of the above-mentioned business operations, from 1 January 2021 to 31 December 2021, unless otherwise stated.

## APPROACH

This report is prepared based on the principles of “materiality”, “quantitative”, “balance” and “consistency”. The board (the “Board”) of directors (the “Director(s)”) has identified the material ESG issues from the annual materiality assessment exercise that involved the ESG working group. The ESG key performance indicator (“KPI”) data are presented in specific and measurable numbers.

## 範圍及報告期間

此乃本集團第六份環境、社會及管治(「環境社會管治」)報告，說明其環境社會管治表現，並參照香港聯合交易所有限公司所頒佈的GEM上市規則附錄二十及指引所述的環境社會管治報告指引作出披露。

本集團的主要業務為(i)銷售及發行刊物，銷售印刷及線上廣告位置以及提供廣告設計及相關製作服務，(ii)銷售廣告的廣告位以及提供廣告採購代理服務；及(iii)組織展覽及表演以推銷產品及服務。除另有指明外，本環境社會管治報告涵蓋2021年1月1日至2021年12月31日，本集團上述業務營運中兩個主要範疇(即環境及社會)的整體表現。

## 方針

本報告乃根據「重要性」、「量化」、「平衡」及「一致性」原則編製。董事(「董事」)會(「董事會」)已透過年度重要性評估活動(當中環境社會管治工作小組參與)識別重要的環境社會管治議題。環境社會管治關鍵績效指標(「關鍵績效指標」)數據乃以特定及可計量數字呈報。

### Reporting principle 匯報原則

### The Group’s response 本集團的回應

Materiality

重要性

The Group reports on issues that are considered as posing significant impacts on environment and society and are important to stakeholders. The issues are presented together with the Group’s management measures in the report.

本集團對該等視作會對環境及社會造成重大影響以及對權益人而言屬重要的的議題進行匯報。此等議題與本集團管理措施一併在報告中呈列。

Quantitative

量化

The Group ensures the KPIs are measurable and accompanied by a narrative explaining its purpose, impacts and calculation methodology. The Group has also commissioned an independent consultant in assessing the carbon emissions in accordance with local and international guidelines.

本集團確保關鍵績效指標可予計量，並附有說明以解釋其目的、影響及計算方法。本集團亦委託獨立顧問遵照當地及國際指引評估碳排放。

## Reporting principle

### 匯報原則

## The Group's response

### 本集團的回應

Balance

平衡

The Group is committed to preparing the report on an unbiased basis. The Group ensures achievements the Group has made and the challenges it has faced are both reported.

本集團致力於編製報告時堅持不偏不倚原則。本集團確保本集團所取得的成就及其所面臨的挑戰均得以匯報。

Consistency

一致性

The Group is committed that consistent methodologies will be adopted in the future reports for meaningful comparison on the Group's ESG performance.

本集團承諾日後報告採納一致性方法，便於對本集團的環境社會管治表現進行有意義的比較。

The Group has adopted the top-down approach with regard to the following sustainability strategies which apply to all levels of the Group:

1. To achieve environmental sustainability
2. To respect human rights and social culture
3. To engage with stakeholders
4. To support our employees
5. To sustain local communities

本集團在以下適用於本集團各範疇的可持續發展戰略方面採取自上而下的方法：

1. 實現環境可持續性
2. 尊重人權及社會文化
3. 與權益人接觸
4. 支持員工
5. 維持本地社區

## STAKEHOLDER ENGAGEMENT AND MATERIALITY

In order to identify the most significant ESG aspects for the Group to focus on, key stakeholders including shareholders, investors and employees have been involved in regular engagement meetings to discuss and to review areas of attention which will help the business meet its potential growth and be prepared for future challenges.

In the reporting period, the Group particularly engaged the board of directors, the management and frontline employees to identify material ESG aspects. The top five ESG material aspects identified were (i) employee health and safety, (ii) labour standards, (iii) intellectual property ("IP") rights, (iv) customer data protection and (v) anti-corruption.

## 權益人參與及重要性

為識別本集團應專注的環境社會管治的最重大層面，關鍵權益人(包括股東、投資者及僱員)已參與定期交流會議，討論及檢討需要注意的地方，以助業務實現潛在增長及為未來挑戰作好準備。

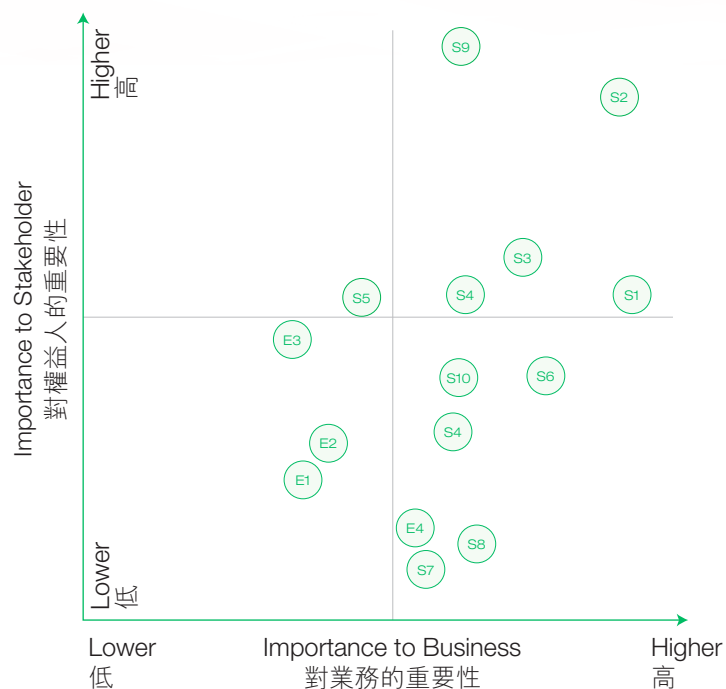
於報告期間，本集團特別請董事會、管理層及前線員工參與識別環境社會管治的主要層面。已識別的環境社會管治中最重要五個層面乃(i)僱員健康與安全；(ii)勞工準則；(iii)知識產權(「知識產權」)；(iv)保障客戶資料以及(v)反貪污。

Management of the above aspects will be discussed in separate sections below. The Group will continue to manage its environmental and social performances with focus placed on the material aspects identified by its stakeholders and aspects that will pose significant impact on the Group.

管理上述層面將於下文另立章節討論。本集團將繼續審慎管理其環境及社會表現，針對其權益人識別的主要層面及將對本集團產生重大影響的層面。

### Materiality Matrix

#### 重要性矩陣



Environmental:	環境	Social:	社會		
E1: Emission	E1 : 排放	S1: Equal Opportunity	S1 : 平等機會	S6: Product Responsibility	S6 : 產品責任
E2: Water	E2 : 水	S2: Occupational Health and Safety	S2 : 職業健康及安全	S7: Intellectual Property	S7 : 知識產權
E3: Energy	E3 : 能源	S3: Development and Training	S3 : 發展及培訓	S8: Data Protection	S8 : 數據保護
E4: Waste	E4 : 廢棄物	S4: Labour Standard	S4 : 勞工準則	S9: Anti-corruption	S9 : 反貪污
		S5: Supply Chain Management	S5 : 供應鏈管理	S10: Community Investment	S10 : 社區投資

## STAKEHOLDERS' FEEDBACK

Effective feedback from stakeholders contributes to the impartial and sustainable evaluation of the ESG performances. Therefore, the Group welcomes stakeholders' feedback on our ESG approach and performance. Please give your suggestions or share your views to the Group via email at [info@wintogroup.com](mailto:info@wintogroup.com).

## THE GROUP'S SUSTAINABILITY VISION

The environment and natural resources are highly related to our daily lives. Sustainable development has become a popular trend around the globe. Nurturing the green industry and eliminating damage to the environment and the society have become a future direction of the Group's development.

### ESG Management

Our ESG strategies are based on the compliance with relevant legal and regulatory requirements, the principle of our sustainability and opinions from our key stakeholders. We have been developing and refining the KPIs and the information processes required to monitor and accurately report them.

The Group has identified the below aspects and adopted relevant KPIs and has monitored and managed them strictly in accordance with the relevant legal and regulatory standards including but not limited to the followings:

- Environmental pollution and climate change;
- High ethical standards and compliance with all legal and regulatory requirements;
- Privacy information protections; and
- Anti-corruption.

## 權益人的意見

權益人提出的有效意見有助於對環境社會管治表現作出公正及可持續性評估。因此，本集團歡迎權益人對環境社會管治方針和表現提出意見。請透過電郵([info@wintogroup.com](mailto:info@wintogroup.com))向本集團提供建議或分享意見。

## 本集團的可持續願景

環境及天然資源與我們的日常生活息息相關。可持續發展已成為全球大勢所趨。培植綠色產業以及消除對環境及社會的損害已成為本集團發展的未來方向。

### 環境社會管治管理

我們的環境社會管治策略基於遵守相關法律及監管要求、可持續性原則及我們主要權益人的意見。我們一直持續發展及優化監察及準確報告所需之關鍵績效指標及資訊流程。

本集團已識別以下範疇及採納相關關鍵績效指標，嚴格依據相關法律及監管標準對其進行監察及管理，包括但不限於下列各項：

- 環境污染及氣候變化；
- 高道德標準並遵守所有法律及監管要求；
- 私隱資料保護；及
- 反貪污。

## A. Environmental pollution and climate change

Given the Group's business, there is minimal direct hazardous air emissions such as nitrogen oxides (NO<sub>x</sub>), sulfur oxides (SO<sub>x</sub>) and particulate matter (PM) or toxic gases, and the only non-hazardous emissions being primarily greenhouse gas including carbon dioxide (CO<sub>2</sub>) generated indirectly from the use of electricity and paper from advertising waste, routine office work and magazine paper.

The Group is committed to mitigating the impact on the environment and climate change. The Group has implemented policies and taken measures to minimize the emissions and waste generation and the adverse impacts on the environment and climate – related issues and to have efficient use of the resources, including energy, water and other materials. Records of the relevant KPIs, including greenhouse gas emissions, electricity usage and paper consumption, have been established.

## A. 環境污染及氣候變化

鑒於本集團的業務，產生微量氮氧化物(NO<sub>x</sub>)、硫氧化物(SO<sub>x</sub>)及顆粒物(PM)或有毒氣體等直接有害空氣排放，並僅產生無害排放，主要為溫室氣體，包括用電及來自廣告廢物、日常辦公的紙張以及雜誌用紙所間接產生的二氧化碳(CO<sub>2</sub>)。

本集團致力減低對環境及氣候變化的影響。本集團已實施政策及採取措施以減少排放及廢棄物產生，以及對環境及氣候相關議題的不利影響，並高效利用能源、水及其他材料等資源。本集團設有相關關鍵績效指標(包括溫室氣體排放、用電及紙張消耗)的記錄。

## 1. Greenhouse Gas Emission

Scope of Greenhouse Gas Emissions	Emission Sources	Emission in 2021 (tCO <sub>2</sub> e) 2021年度排放量 (以噸二氧化碳當量表示)	Emission in 2020 (tCO <sub>2</sub> e) 2020年度排放量 (以噸二氧化碳當量表示)
溫室氣體排放範圍	排放來源		
<b>Scope 1</b>			
<b>範圍1</b>			
Direct Emission 直接排放	Petrol Consumption by Group-owned vehicles 本集團擁有的汽車消耗的汽油	-	-
<b>Scope 2</b>			
<b>範圍2</b>			
Indirect Emission 間接排放	Purchased Electricity (for offices and advertising services) 購買電力(供辦公室及廣告服務使用)	18	30
<b>Scope 3</b>			
<b>範圍3</b>			
Other Indirect Emission 其他間接排放	Paper Consumption 紙張消耗	5	4
	Business Air Travel 航空差旅	-	-
<b>Total</b> 總計		<b>23</b>	34

Note: Combined margin emission factor (average) of 0.63 tCO<sub>2</sub>e/MWh was used for purchased electricity.

There were 23 tonnes (2020: 34 tonnes) of carbon dioxide equivalent greenhouse gases (mainly carbon dioxide, methane and nitrous oxide) emitted from the Group's operation in the reporting period.

## 1. 溫室氣體排放

附註：購買的電力使用每兆瓦時0.63噸二氧化碳當量合併邊際排放系數(平均)計算。

本集團的營運於報告期間排放了23噸(2020年：34噸)二氧化碳當量溫室氣體(主要為二氧化碳、甲烷及氧化亞氮)。

## 2. Emissions from Vehicles

The Group has one petrol engine vehicle which contributed to greenhouse gas emissions and emitted nitrogen oxides, sulphur oxides and particulate matter.

## 3. Electricity

The electricity consumption of the Group was 27,000 kWh (2020: 46,000 kWh). The Group encourages and constantly reminds employees to adopt energy-saving practices including switching off idling lighting devices and electrical appliances.

## 4. Water

The Group involved only small amount of water consumption in offices. Water consumption of the offices was managed by the building management office, consumption data was therefore not available.

## 5. Non-hazardous Wastes

The Group generates no hazardous waste in its operation. Non-hazardous wastes from the Group's operation are mainly advertising and paper wastes. To reduce waste generation at office, employees are encouraged to bring their own tableware for lunch rather than using disposable tableware.

### (i) Advertising Waste

A total of 7 tonnes of waste outdoor advertisement canvases (2020: 6 tonnes) were generated in the reporting period. Advertising wastes were collected by respective sub-contractors.

## 2. 汽車排放

本集團的一部汽油引擎汽車排放溫室氣體及排放氮氧化物、硫氧化物及懸浮粒子。

## 3. 電力

本集團的電力消耗量為27,000千瓦時(2020年：46,000千瓦時)。本集團鼓勵並持續提醒僱員採取節能措施，包括關掉無人使用的照明裝置及電器。

## 4. 水

本集團辦公室涉及少量水消耗。辦公室的水消耗由大廈管理辦公室管理，故並無消耗數據提供。

## 5. 無害廢棄物

本集團的營運並無產生有害廢棄物。來自本集團營運的無害廢棄物主要為廣告及紙張廢物。為減少辦公室產生廢棄物，本集團鼓勵僱員自行攜帶午膳餐具，代替使用即棄餐具。

### (i) 廣告廢物

於報告期間，合共產生7噸廢棄戶外廣告板(2020年：6噸)。廣告廢物由有關承包商收集。



(ii) *Office Paper*

The Group practises paper saving initiatives, such as encouraging employees to:

- Adopt environmentally-friendly photocopy habits (e.g. use duplex printing)
- Use recycling paper for drafting and internal use
- Use electronic device instead of printed hard copies during presentations

Recycling bins were provided in offices' common area to separately collect waste paper for recycling, which was then collected by building management. A total of 1,000 kg of paper (2020: 800 kg) has been used for daily office operations such as document printing and deliverables, contributing to 5 tonnes of carbon dioxide equivalent emission (2020: 4 tonnes).

(iii) *Magazine Paper*

Although the Group does not involve in printing of its publications, the Group practises a recycling scheme in which readers are encouraged to return read magazines for recycling. To reduce paper disposal to the landfill, the Group also engaged its distributor to recycle waste magazines and other paper. A total of 7 tonnes of paper (2020: 10 tonnes) were recycled during the reporting period, contributing to a reduction of 2 tonnes of carbon dioxide equivalent emission (2020: 2 tonnes).

(ii) *辦公室用紙*

本集團實施節約用紙措施，例如鼓勵僱員：

- 採取環保的影印習慣(例如雙面列印)
- 利用回收紙作起草及內部用途
- 做簡報時使用電子儀器代替列印本

辦公室的公共空間已設置回收箱以分開收集廢紙循環再造，之後由大廈管理處收集。日常辦公室運作共使用1,000公斤紙張(2020年：800公斤)作文件列印及交付等用途，排放了5噸二氧化碳當量(2020年：4噸)。

(iii) *雜誌用紙*

雖然本集團並無參與印刷其刊物，但本集團推出回收計劃，鼓勵讀者將讀完的雜誌交回以循環再造。為減少棄置至堆填區的用紙，本集團亦推動其分銷商回收雜誌及其他紙張。於報告期間，合共回收7噸紙張(2020年：10噸)獲循環再造，致減少2噸二氧化碳當量排放(2020年：2噸)。

## 6. Business Air Travel

During the reporting period, nil employee (2020: nil employee) travelled to the PRC for site visit and investigating new business opportunities, resulting in no carbon dioxide equivalent greenhouse gases (2020: nil tonne).

## 7. Mitigation Measures

As a responsible corporation, we are conscious of the effects of our operations may have on the environment and value on reducing the environmental impact of our daily operations.

We have taken the following measures to reduce the emission of greenhouse gases as well as to be energy efficient:

- Encourage the practice of recycling used papers and double-sided printing;
- Adjust the temperature of our offices appropriately and use of energy-saving mode of the electronic devices after a period of inactive; and
- Utilize recycled packaging and products whenever possible.

As a result, the generation of greenhouse gas emission and non-hazardous waste during the year 2021 was reduced as compared to last year.

It is the target of Group to further reduce the emissions and non-hazardous wastes by enhancing the efficiency of the use of resources and energy in the coming year.

## 6. 航空差旅

於報告期間，並無僱員(2020年：0名)前往中國作實地視察及探索新業務機遇，並無產生二氧化碳當量的溫室氣體(2020年：0噸)。

## 7. 緩解措施

作為負責任的企業，我們一直關注我們的營運方面可能對環境產生的影響，並重視減少我們日常營運對環境的影響。

我們已採取以下措施減少溫室氣體排放及提高能源效率：

- 鼓勵回收廢舊紙張及使用雙面印刷；
- 適當調整辦公室溫度，並在電子設備停用一段時間後使用節能模式；及
- 盡可能使用循環再造的包裝及產品。

因此，2021年溫室氣體排放及無害廢棄物的產生量較上年有所減少。

本集團的目標為於來年透過提升資源及能源使用的效率，進一步減少排放及無害廢棄物。

## B. Social

The Group strives to build mutually beneficial relationships with our stakeholders, including our employees. The Group is committed to create a diverse and inclusive workplace with barrier-free communication and mutual respect.

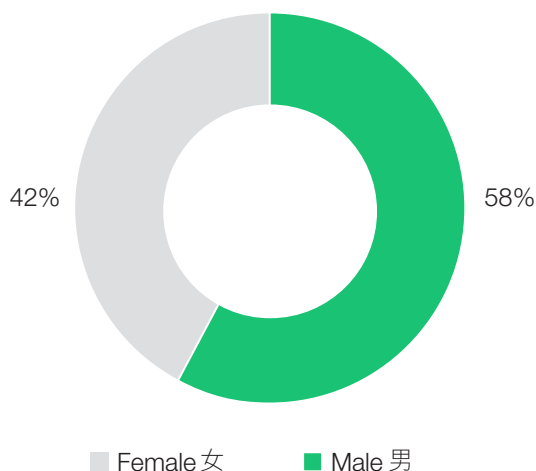
### 1. Employment and Labour Practices

#### (i) Employment

The Group offers competitive remuneration, promotion opportunities, compensation and benefit packages to attract and retain talents. The Group had a total number of 31 employees as of 31 December 2021, of which 100% was working as full-time staff in China.

#### Distribution of Workforce by Gender

按性別劃分的僱員分佈



## B. 社會

本集團致力於與權益人(包括僱員)建立互惠互利的關係。本集團致力於創造無障礙溝通及互相尊重的多元化及包容性工作場所。

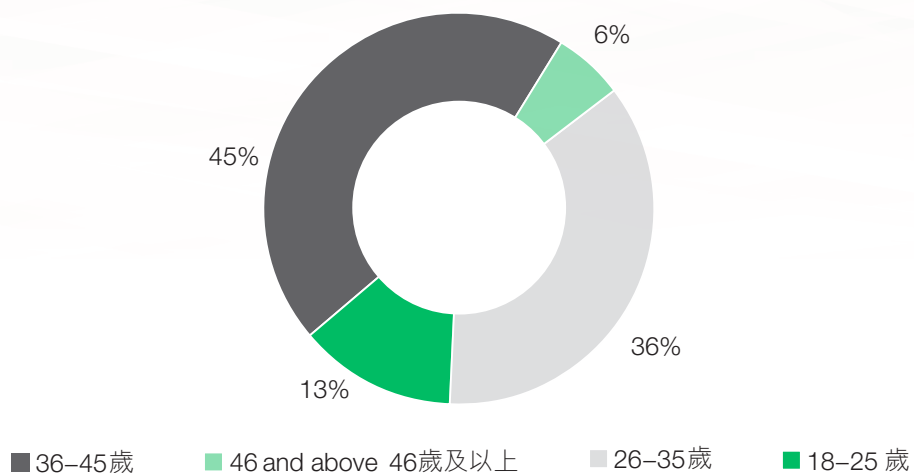
### 1. 僱傭及勞工常規

#### (i) 僱傭

本集團提供具競爭力的薪酬、晉升機會、補償及福利待遇以吸引及挽留人才。截至2021年12月31日，本集團的僱員總數為31人，全部均為中國全職員工。

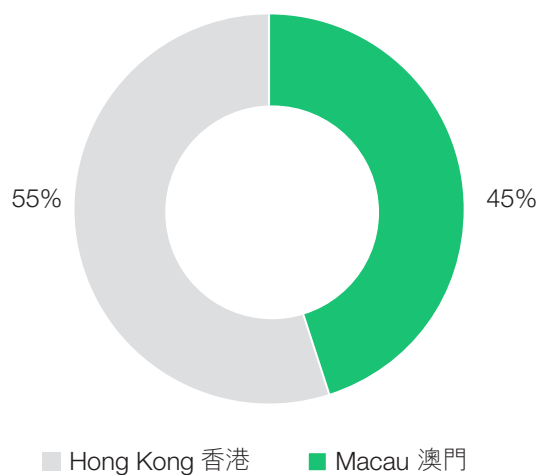
### Distribution of Workforce by Age Group

按年齡組別劃分的僱員分佈



### Distribution of Workforce by geographical region

按地區劃分的僱員分佈



Remuneration and performance of employees are reviewed annually. Remuneration is reviewed according to the industry market and inflation rates, while performance of employees is reviewed through appraisals. Employees are entitled to performance bonus, mandatory provident fund, insurance (including medical, pension, injury, unemployment, maternity and business travel) and paid leave (such as annual leave, sick leave, maternity leave and paternity leave). Employees working overtime are entitled to overtime compensation leave. Apart from the attractive package provided, the Group offers protection on personal data, protection on intellectual properties, and procedures for labour disputes. Employees are also well-informed of the Group's code of conduct, their promotion channels and appraisal procedures from the comprehensive guidelines in the employees' handbook. No material non-compliance in relation to employment laws and regulation was recorded during the reporting period.

During 2021, there are two employees left the Group, both of whom are male, aged between 36-45 and each of them worked in Hong Kong office and Macau office respectively.

僱員薪酬及表現會每年檢討。薪酬是根據行業市場及通脹率檢討，而僱員表現則參照僱員考核檢討。僱員可享有表現花紅、強制性公積金、保險(包括醫療、養老金、傷病、失業、生育及差旅)及有薪假期(如年假、病假、產假及侍產假)。僱員超時工作可獲超時工作補假。除提供具吸引力的待遇外，本集團提供個人資料保障、知識產權保障及勞工糾紛排解程序。僱員亦可從僱員手冊的全面指引中獲悉本集團的行為守則、晉升渠道及考核程序。於報告期間，概無錄得有關僱傭法律及法規的重大違規情況。

於2021年，本集團有兩名離職僱員，均為男性，年齡介乎36-45歲，各人分別任職於香港辦事處及澳門辦事處。

(ii) *Employee Health and Safety*

The Group is accountable for providing comprehensive occupational health and safety measures and essential protection equipment to its employees. For example, during outdoor advertisement fixing, the Group assigns supervision staff to ensure outsourced advertisement-fixing workers are working in a safe environment with appropriate personal protective equipment (“PPE”). Assigned supervision staff is also briefed with relevant safety procedures and provided with PPE. No material non-compliance with laws and regulations regarding occupational health and safety was recorded during the reporting period.

**Occupational Health and Safety Data for the past three years (2019–2021)**

Work related fatality  
Work injury cases >3 days  
Work injury cases ≤3 days  
Lost days due to work injury

(iii) *Development and Training*

All employees are required to engage in training provided by the Group. Such training includes induction training, departmental training, specialised training and external training. Induction training helps employees understand the Group’s businesses, policies and work procedures. Departmental training strengthens existing employees’ work-related knowledge and practical skills. Specialised training focuses on topics such as communication skills or work attitude, enhancing employees’ personal development. External training provides employees with the most updated knowledge and technology, ensuring employees keep pace with the Group’s development. Training quality is evaluated by participants after completion of the training courses to pursue unceasing improvement.

During 2021, the average training hours completed per employee are 6 hours. The training hours are the same for both male and female employees.

(ii) *僱員健康與安全*

本集團有責任向僱員提供全面的職業健康與安全措施及必要的防護裝備。例如，於安裝戶外廣告時，本集團派遣監督人員確保外判廣告安裝工人於安全環境下工作，並佩戴適當的個人防護裝備（「個人防護裝備」）。本集團亦會向獲派遣的監督人員簡介相關安全程序及提供個人防護裝備。於報告期間，概無錄得有關職業健康與安全的法律及法規重大違規情況。

**過往三年(2019年至2021年)  
職業健康與安全數據**

因工作關係而死亡的人數	0
工傷個案>3日	0
工傷個案≤3日	0
因工傷損失工作日數	0

(iii) *發展及培訓*

所有僱員均須參與本集團所提供的培訓。有關培訓包括入職培訓、部門培訓、專門培訓及外間培訓。入職培訓幫助僱員了解本集團的業務、政策及工作程序。部門培訓提升在職僱員的工作相關知識及實用技能。專門培訓專注於溝通技巧或工作態度等主題，促進僱員的個人發展。外間培訓為僱員提供最新知識及科技，確保僱員與本集團的發展步伐一致。培訓質素由參與者於完成培訓課程後評估，以求不斷進步。

於2021年，每名僱員完成培訓的平均時數為6小時。男性與女性僱員的培訓時數相同。

(iv) *Employment Communications*

Employees are valuable assets of the Group. The Group acknowledges the importance of interactive communications with employees. Regular staff gatherings are arranged to enhance the communications between senior management and employees, such as lunch gatherings and festive parties.

The Group rewards employees for their credits and take disciplinary actions for their misconduct. This ensures that good behaviours are fostered and maintained in their work environment. For instance, attendance awards are presented monthly to full-attendance employees to appreciate their devotion and encourage positive work attitude.

Another channel of communication is the appraisal system. The system aims to improve employees' performances, increase their performance satisfaction and sense of accomplishment. It has an open and transparent process in which employees can evaluate their performance through advice from their supervisors and reflect their expectations or feedback to the Group.

(v) *Labour Standard*

There was no child nor forced labour in the Group's operations in the reporting period. Background check was conducted for every new employee to ensure compliance with the Employment Ordinance, Chapter 57 of the Laws of Hong Kong in terms of employment management. Its Macau operations are in compliance with the Labour Law of the Macau.

(iv) *僱傭溝通*

僱員為本集團的寶貴資產。本集團深明與僱員互動溝通的重要性。本集團安排定期員工聚會以加強高級管理層與僱員之間的溝通，例如午膳聚餐及節日派對。

本集團對僱員論功行賞，行為不當者則進行紀律處分。此舉確保於工作環境中培養並維持良好行為。例如，本集團每月向全勤僱員頒發出勤獎勵，嘉許彼等的努力及提倡積極的工作態度。

另一個溝通渠道為考核體制。該體制旨在改進僱員的表現、增加彼等表現的滿足感及成就感。該體制具有公開及透明的程序，讓僱員通過上司的建議評估彼等的表現，並向本集團反映彼等的期望或意見。

(v) *勞工準則*

於報告期間，本集團的營運中並無童工或強制勞工。本集團已對每名新聘僱員進行背景審查，確保遵守香港法例第57章僱傭條例有關僱傭管理的規定。其澳門的營運則遵循澳門勞動法。

(vi) *Equal Opportunity*

There is no policy on anti-discrimination, nevertheless equal opportunities are given to employees in respect of recruitment, training and development, job advancement, and compensation and benefits. The employees are not discriminated against or deprived of such opportunities on the basis of gender, ethnic background, religion, colour, sexual orientation, age, marital status, family status, retirement, disability, pregnancy or any other discrimination prohibited by applicable law.

## 2. *Operating Practices*

(i) *Supply Chain Management*

The Group evaluates suppliers on their product and service quality on continuing basis so as to assist the selection progress of suppliers. The Group give priority to eco-friendly suppliers which fulfill the industrial requirements and the expected quality at the same time.

(ii) *Product Responsibility*

The Group has the quality inspection procedure in place to ensure the quality of products, during the reporting period, the Group did not notice any recall or non-compliance as required by related laws and regulations.

### Intellectual Property

Intellectual property includes trademarks, service marks, copyrights, rights in inventions, rights in know-how etc. Whether registered or unregistered, all rights or forms of protection have an equivalent or similar effect anywhere in the world.

The Group have registered trademarks for its magazine publications, to protect its exclusive right to use the trademarks and avoid other readers using conflicting trademarks. No material non-compliance with laws and regulations regarding intellectual property was recorded during the reporting period.

(vi) 平等機會

本集團並無反歧視政策，惟在招聘、培訓及發展、工作晉升以及補償及福利方面會給予僱員平等的機會。僱員不會基於性別、種族背景、宗教、膚色、性取向、年齡、婚姻狀況、家庭崗位、退休、傷殘、懷孕或適用法律所禁止的任何其他歧視而受到歧視或遭剝奪機會。

## 2. 營運慣例

(i) 供應鏈管理

本集團持續評估供應商的產品及服務質量，以協助供應商甄選進度。本集團優先考慮同時符合工業規定及預期質量的環保型供應商。

(ii) 產品責任

本集團已制定質量檢查程序以保障產品質量，於報告期內，本集團未有發現任何召回或未遵守相關法律法規要求的情況。

### 知識產權

知識產權包括商標、服務標記、版權、發明的權利、工業知識的權利等。不論有否註冊，所有權利或保障形式於世界各地均有同等或相若的效力。

本集團已為其雜誌刊物註冊商標，以保障其使用該等商標的獨家權利及避免其他讀者使用有衝突的商標。於報告期間，概無錄得有關知識產權的法律及法規重大違規情況。



## Confidentiality

Confidential information includes all confidential information or trade secrets of the Group. It also includes contact details, requirements of customers, financial information and marketing or business plan of customers. All employees acknowledge and warrant not to disclose the above information by signing the employment contract. Employees violating the confidentiality-related regulations can be dismissed. The Group also has centralised management to control access rights to its confidential information. No substantiated complaints concerning breaches of client privacy, identified leaks, thefts, or losses of customer information was received during the reporting period.

### (iii) *Anti-corruption*

The Group commits to managing all business without undue influence and has regarded honesty, integrity, and fairness as its core values. All directors and employees are required to strictly follow the Group's policy to prevent potential bribery, extortion, fraud and money laundering. Anti-corruption policies are also clearly stated in the employment contract. Although entertainment is not defined as "advantage" under the Prevention of Bribery Ordinance (Cap 201) of the Laws of Hong Kong, employees should turn down invitations to meals or entertainment that are excessive in nature or frequency. Whistle-blowing procedures on reporting misconduct and malpractice (including corruption) are also established in the Group's employees' handbook. Corruption cases bring severe damage to the Group's reputation. Employees involved in corruption can be dismissed and liability shall be pursued in accordance with the law.

## 保密

保密資料包括本集團的一切保密資料或商業秘密，亦包括聯絡資料、客戶要求、客戶的財務資料及市場推廣或業務計劃。所有僱員均已簽署僱傭合約，確認及保證不會披露以上資料。違反保密相關規例的僱員可遭解僱。本集團亦已實行中央管理以監控其保密資料的存取權。於報告期間，概無接獲有關違反客戶私隱、已識別洩漏、盜竊或遺失客戶資料的證明屬實的投訴。

### (iii) *反貪污*

本集團致力在不受不當影響的情況下管理所有業務，並視誠實、正直及公平為其核心價值。全體董事及僱員均須嚴格遵守本集團防止潛在賄賂、勒索、欺詐及洗黑錢的政策。反貪污政策亦於僱傭合約清楚訂明。雖然款待在香港法例第201章防止賄賂條例下並無被界定為「利益」，但僱員應拒絕過度或過密的餐飲或款待邀請。匯報不當行為及舞弊行為（包括貪污）的舉報程序亦已在本集團的僱員手冊中確立。僱員涉貪會使本集團的聲譽嚴重受損。彼等可遭解僱，並須依法追究責任。

The Group was in compliance with all applicable laws on prohibiting corruption and bribery of Hong Kong and Macau. There was no concluded legal case regarding corrupt practices brought against the Group or its employees during the reporting period.

本集團遵守所有有關香港及澳門禁止貪污及賄賂的適用法律。於報告期間，概無發生就貪污行為對本集團或其僱員發起的已完結案件。

## C. Community

### 1. Community Investment

The Group recognises the importance of contributing back to the society and supporting social initiatives to help the underprivileged in the society. It also encourages employees to participate in charitable events during leisure time to foster their sense of social responsibility. However, due to restrictions during the COVID-19 pandemic, the Group did not engage in any community initiatives during the reporting period.

## C. 社區

### 1. 社區投資

本集團注重回饋社會，並支持可協助社會弱勢群體的社會倡議，同時亦鼓勵其員工閒暇之餘參與慈善活動，進而培養其社會責任感。然而，由於COVID-19疫情期間的出行限制，本集團在報告期內並無參與任何社區活動。

**WINTO GROUP (HOLDINGS) LIMITED**  
**惠陶集團(控股)有限公司**