



CLSA Premium Limited

(前稱昆侖國際金融集團有限公司)
(Formerly known as KVB Kunlun Financial Group Limited)
(於開曼群島註冊成立之有限公司)
(Incorporated in the Cayman Islands with limited liability)

股份代號 Stock Code : 6877



2019 年環境、社會和管治報告

2019 Environmental, Social and Governance Report

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ABOUT THIS REPORT

CLSA Premium Limited (the “Company” together with its subsidiaries shall be referred to as the “Group” or “CLSA Premium”) is pleased to present this Environmental, Social and Governance (“ESG”) Report (“ESG Report” or the “Report”) for the year ended 31 December 2019. The Report serves the following purposes:

- communicate to all stakeholders the Group’s achievement in practicing corporate social responsibility;
- promote sustainable development; and
- focus on the environmental and social issues that have impacts on stakeholders’ interests.

The Report adopts the reporting framework set out under the ESG Reporting Guide in Appendix 27 to the Rules Governing the Listing of Securities on The Stock Exchange of Hong Kong Limited. We have prepared this Report to meet the “Comply or Explain” provisions, of which mandatory Key Performance Indicators (KPIs) and some recommended KPIs are disclosed. As such, we have been able to produce a balanced report, focusing on our key material issues.

SCOPE OF THIS REPORT

This Report details the ESG performance of the Group for the financial year ended 31 December 2019 (the “Reporting Period” or “the year”). We apply the concept of materiality in planning and developing the ESG Report – unless otherwise indicated, the Report focuses on our businesses in Australia, Hong Kong and New Zealand.

STAKEHOLDER ENGAGEMENT

As part of the business strategy, the Group communicates with the stakeholders in an open, honest and proactive way. We maintain various channels on relevant issues including the performances and challenges of sustainability with our stakeholders. We identify and prioritize key stakeholders from time to time, and formulate the engagement approaches through regular engagement sessions. The outcomes of these stakeholder engagement processes have been consistently applying to our continuous improvement activities.

關於本報告

CLSA Premium Limited (「本公司」，連同其附屬公司統稱「本集團」或「CLSA Premium」)欣然提呈截至2019年12月31日止年度之環境、社會及管治 (「環境、社會及管治」) 報告 (「環境、社會及管治報告」或「本報告」)。本報告有以下目的：

- 向全體股東傳達本集團履行企業社會責任的成果；
- 推動可持續發展；及
- 關注會影響持份者權益的環境及社會事宜。

本報告採用根據香港聯合交易所有限公司證券上市規則附錄27之環境、社會及管治報告指引所載之報告框架。我們編製本報告以符合「不遵守就解釋」條文，當中已對強制性關鍵績效指標 (關鍵績效指標) 及若干建議關鍵績效指標作出披露。因此，我們得以重點關注我們的關鍵重大事宜制定一份平衡的報告。

本報告範圍

本報告詳述本集團於截至2019年12月31日止年度 (「報告期間」或「本年度」) 的環境、社會及管治績效。我們在規劃及發展環境、社會及管治報告中應用了實質性的概念——除另有指明外，本報告重點關注我們於澳洲、香港及紐西蘭業務。

持份者參與

作為業務戰略的一部分，本集團以公開、誠實及積極的方式進行溝通。我們保持多種渠道就相關事宜與持份者溝通，包括可持續性的表現及挑戰。我們不時識別關鍵持份者的優先次序，並通過定期參與會議制定參與方式。該等持份者參與過程的結果適用於我們的持續改進活動。

A. ENVIRONMENT

We acknowledge the importance of raising the awareness of our employees to understand our environmental impact and stress our determination by taking various reduction initiatives for reducing our carbon footprint. We will continue to support our employees, communities and other stakeholders in reducing environmental impact in their personal and business activities in the global context.

1. EMISSIONS

As our Group is principally engaged in investment in foreign exchange broker, liquidity provider and securities broker, we do not have significant air emissions and discharges into water or land, such as nitrogen oxides, sulphur oxides and respiratory suspended particles; nor do we produce significant volumes of hazardous waste. The major emissions of the Group are the greenhouse gases emissions and solid non-hazardous wastes generated from our office operations.

(a) Greenhouse Gases Emissions

The major sources of air and greenhouse gas (GHG) emissions we associated are energy consumptions, including the fuel consumed by the Group's vehicles and purchased electricity used in offices and daily operations.

The total greenhouse gases generated by the Group during the Reporting Period were 110.99 tonnes CO₂e, with an intensity of 5.29 tonnes CO₂e/employee, comprising of our electricity and petrol consumptions, as well as the disposal of paper waste.

A. 環境

我們意識到提高僱員認識環境影響的重要性，並透過各種節約措施加強我們對減少碳排放的決心。我們將繼續支持僱員、社區及其他持份者於全球不同地區的個人和商業活動中減少對環境的影響。

1. 排放物

由於本集團主要從事投資外匯經紀、流通量提供者及證券經紀，我們並無大量空氣排放物及對水或土地的排放物，如氮氧化物、硫氧化物及可吸入懸浮粒子；我們亦無產生大量有害廢棄物。本集團主要排放為由辦公室營運所產生的溫室氣體排放及固體無害廢棄物。

(a) 溫室氣體排放

與我們有關的空氣及溫室氣體（溫室氣體）排放主要來源為能源消耗，包括本集團汽車所消耗的燃油，以及辦公室及日常營運所使用的購買電力。

於報告期間，本集團產生的溫室氣體總量為110.99噸二氧化碳當量，每名僱員排放密度為5.29噸二氧化碳當量，包括我們的電力及汽油消耗，以及處置廢棄紙張。

Scope of GHG Emission 溫室氣體排放範圍	Emission Source 排放來源	Emission (in tonnes of CO ₂ e) 排放量 (以噸二氧 化碳當量計)	2017 Intensity (Emission/ Employee) 2017年密度 (排放量/ 僱員)	Emission (in tonnes of CO ₂ e) 排放量 (以噸二氧 化碳當量計)	2018 Intensity (Emission/ Employee) 密度 (排放量/ 僱員)	Emission (in tonnes of CO ₂ e) 排放量 (以噸二氧 化碳當量計)	Intensity (Emission/ Employee) 密度 (排放量/ 僱員)	2019 Total Emission (in percentage) 2019年 總排放量 (以百分比計)
Scope 1 範圍1								
Direct Emission 直接排放	Consumption of fuel by the Group's vehicles 本集團汽車消耗燃油	43.68	0.57	55.21	1.04	34.08	1.62	31%
Scope 2 範圍2								
Indirect Emission 間接排放	Purchased electricity 購買電力	188.7	2.49	89.53	1.69	73.02	3.48	66%
Scope 3 範圍3								
Other Indirect Emission 其他間接排放	Disposal of paper waste 處置廢棄紙張	18.89	0.25	7.98	0.15	3.89	0.19	3%
Total 總計		251.27	3.31	152.72	2.88	110.99	5.29	100%

Table 1 – Total Green House Gas Emissions in the Reporting Period
表1 – 報告期間的溫室氣體排放總量



-27%

Total GHG Emissions in 2019*
2019年溫室氣體排放總量*



-51%

**GHG Emissions from disposal of paper
waste in 2019***
**2019年處置廢棄紙張產生的
溫室氣體排放總量***

* compared to 2018 figures (in tonnes of CO₂e)

* 與2018年數字比較(以噸二氧化碳當量計)

Infographic 1 – 2019 GHG emissions compare to 2018
圖表1 – 2019年溫室氣體總排放量與2018年比較

(b) Waste Management

The Group upholds the principles of waste management and is committed to the proper handling and disposal of all wastes from our business activities. During the Reporting Period, our Group did not generate a significant amount of hazardous waste, while the major non-hazardous waste generated was paper, with a weight of 811 kg, equivalent to 0.19 tonnes CO₂e/employee.

2. USE OF RESOURCES

The Group is committed to conserve resources for the purposes of environmental and operating efficiency. To pursue our environmental commitment, we implement multiple measures in enhancing energy efficiency, minimizing the use of papers, reducing water consumption, encouraging video conferencing instead of business trips and driving behavioural changes of employees. Through active monitoring and managing the use of resources, we aim to reduce our operating costs as well as our carbon footprints. The use of packaging materials is not relevant to our businesses, while details of energy and water consumptions will be discussed in the following sessions.

(b) 廢棄物管理

本集團堅持廢棄物管理原則，並致力妥善處理及處置我們業務活動所產生的所有廢棄物。於報告期間，本集團並無產生大量有害廢棄物，而所產生的主要無害廢棄物為紙張，達811公斤，相當於每名僱員排放密度為0.19噸二氧化碳當量。

2. 資源使用

本集團致力保護資源以達致環保及營運效益。為履行我們的環保承諾，我們已實施多項措施提升能源效益、減低用紙量、減少用水、鼓勵使用視像會議代替商務差旅及改變僱員的行為。通過積極監察及管理資源使用，我們旨在減少營運成本及碳足跡。使用包裝物料與我們的業務並不相關，而有關能源及水資源消耗之詳情將於下述章節討論。

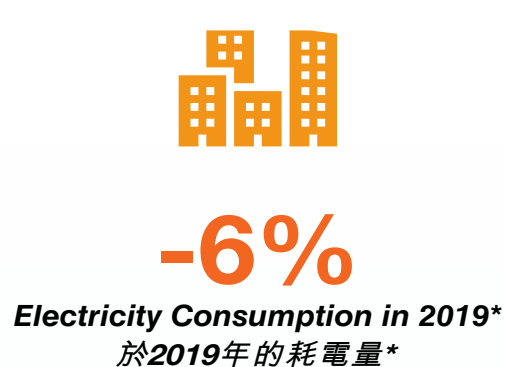


(a) Energy

During the Reporting Period, the energy we consumed directly for our operations are as follows:

Energy 能源	Unit 單位	2017 Intensity (Consumption/ Employee) Consumption Quantity 2017年密度 消耗量 (消耗量/僱員)		2018 Intensity (Consumption/ Employee) Consumption Quantity 2018年密度 消耗量 (消耗量/僱員)		2019 Intensity (Consumption/ Employee) Consumption Quantity 2019年密度 消耗量 (消耗量/僱員)	
Electricity 電	kWh 千瓦時	311,783	4,102.4	198,072	3,737.2	186,429	8,877.55
Petrol 汽油	L 公升	16,826	221.4	20,388	384.7	12,586	599.32

Table 2 – Total Energy Consumption in the Reporting Period
表2 – 於報告期間的能源消耗總量



* compared to 2018 figures

* 與2018年數字比較

Infographic 2 – 2019 petrol consumption compare to 2018
圖表2 – 2019年耗油量與2018年比較

In order to reduce energy consumption, we encourage employees to switch off the lights, air conditioners, computers, personal electronic devices and common office equipment when they are not in use. Further, we maintained our office electronic appliances, for instance, air conditioners, microwaves, coffee machines, etc. in good conditions so as to save electricity. We also encourage the application of energy-saving mode for all computers.

(a) 能源

於報告期間，我們於營運中直接消耗的能源如下：

Energy 能源	Unit 單位	2017 Intensity (Consumption/ Employee) Consumption Quantity 2017年密度 消耗量 (消耗量/僱員)		2018 Intensity (Consumption/ Employee) Consumption Quantity 2018年密度 消耗量 (消耗量/僱員)		2019 Intensity (Consumption/ Employee) Consumption Quantity 2019年密度 消耗量 (消耗量/僱員)	
Electricity 電	kWh 千瓦時	311,783	4,102.4	198,072	3,737.2	186,429	8,877.55
Petrol 汽油	L 公升	16,826	221.4	20,388	384.7	12,586	599.32



為減少能源消耗，我們鼓勵僱員關掉不使用的電燈、空調、電腦、個人電子裝置和公共辦公室設備。此外，我們維持辦公室電器（例如空調、微波爐、咖啡機等）的良好保養以節省電力。我們亦鼓勵將所有電腦設定為節能模式。

(b) Water

The sustainable and responsible use of our water resources is a key issue globally. We are aware that water shortages, excessive demand and usage could pose a serious problem. Due to our business nature, we do not use or discharge significant amount of water. However, in order to raise the awareness of water conservation, our Group promotes water saving practices in the workplace. For instance, signs regarding water-saving and reducing wastage of potable water are placed in pantries.

(c) Waste

Given the Group is principally engaged in financial investment, we do not use a significant amount of packaging materials for finished products. Nevertheless, the Group upholds the principles of waste management and is committed to the proper handling and disposal of all wastes from our business activities. With an emphasis on reduce, reuse and recycle, we aim to minimize the amount of waste we generate. All our waste management practices comply with relevant law and regulations.

In order to minimize the disposal of wastes to the landfill, we adopt and promote green printing practices such as collect and reuse single-side printed papers, proper checking for space, margin and page before printing documents. On the other hand, to reduce the use of resources we also apply economic mode on printers – , i.e. setting black and white as the default mode and the using recycling paper. We advocate the principle of “Think before Print” among staff to reduce wastage and promote effective use of paper. For instance, messages are disseminated by e-mail instead printing hard copies.

(d) Compliance

For the year ended 31 December 2019, the Group did not identify any non-compliance incidents in relation to environmental protection that has a significant impact on the Group.

(b) 用水

可持續及負責任地使用水資源是一個全球關鍵議題。我們意識到缺水、過度需求及使用可引致嚴重問題。鑑於我們的業務性質，我們並無使用或排放重大水量。然而，為提高節約用水的意識，本集團在工作場所促進節約用水措施，例如在茶水間張貼有關節約用水及減少浪費飲用水的標誌。

(c) 廢棄物

由於本集團主要從事金融投資，我們並無就製成品使用大量包裝物材。然而，本集團堅持廢棄物管理原則，並致力妥善處理及處置我們業務活動所產生的廢棄物。藉著強調減少、重用及回收，我們旨在將我們所產生的廢物量減至最低。我們所有的廢棄物管理措施均符合相關法例及規例。

為盡量減少堆填區的廢棄物處置，我們採取及促進綠色印刷方法，例如收集及重用已單面印刷的紙張、印刷文件前適當檢查空間、邊距和頁數。另一方面，為減少使用資源，我們的打印機亦已採用經濟模式，即設定為黑白印刷模式及使用環保紙。我們向員工提倡「列印前三思」原則以減少浪費及促進有效使用紙張。例如，透過電郵傳達訊息以替代印刷文件。

(d) 合規性

於截至2019年12月31日止年度，本集團並無發現有關環境保護並對本集團造成重大影響的不合規事件。

3. THE ENVIRONMENT AND NATURAL RESOURCES

With respect to our business nature and activities, the impact of the Group on the environment and natural resources is not significant. Consumption of energy mainly stemmed from the use of electricity and paper in office operations. During the Reporting Period, we have stipulated a number of measures to reduce the use of resources and disposal of waste (refers to above “Use of Resources” for details).

We will continue to assess the environmental risks of our business, review the environmental practices and adopt preventive measures as necessary to reduce the risks, and ensure the compliance with relevant laws and regulations applicable to the Group’s emissions and use of resources.

B. SOCIAL

We recognize that employees are our most valuable assets and vital to achieving our sustainability and long-term growth. We devote substantial resources to maintain a robust employee policy system, which cover compensation, dismissal, recruitment, promotion, working hours, rest periods and other benefits.

We aim at building a high-quality relationship with our employees based on mutual respect to encourage work creativity, flexibility and commitment. This will ultimately accomplish our mission – to provide our clients with quality products and services. To achieve this, we create opportunities to attract, develop, retain and reward our talented staff by offering them, under different conditions, commensurate remuneration, personal growth, career development training, as well as fringe benefits, such as medical insurance, retirement benefits, pension, long service awards, leave vacation, share options and other employment benefits as detailed below.

3. 環境及自然資源

關於我們的業務性質及活動方面，本集團對環境及自然資源所造成的影響並不重大。能源消耗主要來自辦公室用電及用紙。於報告期間，我們已制定了一系列的措施以減少資源使用及妥善處置廢棄物（詳情請參閱上文「資源使用」）。

我們將繼續評估我們業務的環境風險、檢討環保措施及於必要時採取預防措施以降低風險，及確保符合適用於本集團排放物及資源使用的相關法例及規例。

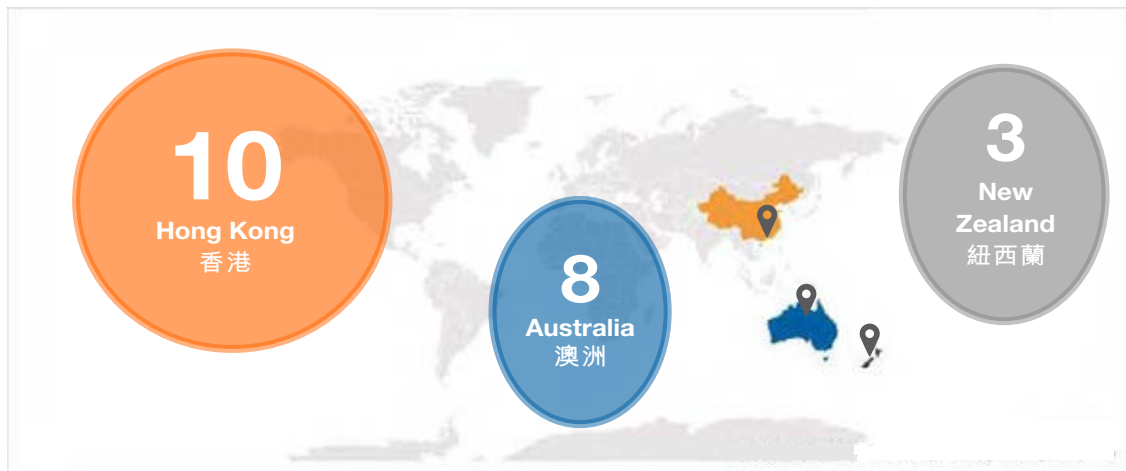
B. 社會

我們一直視僱員為我們最寶貴的資產，對於實現可持續和長遠發展至關重要。我們投入大量資源維持強勁的僱傭政策制度，包括補償、解僱、招聘、晉升、工時、休息時間和其他福利。

我們致力於互相尊重的基礎上建立良好的僱傭關係，鼓勵僱員創新、靈活及履行承諾，從而達致我們為客戶提供優質產品及服務的使命。就此，我們根據不同情況向僱員提供相稱的薪酬、個人發展、職業發展培訓，以及各種福利，如下文詳述的醫療保險、退休金、長期服務獎、假期、購股權和其他就業福利，藉以創造有利條件吸引、培養、挽留和獎勵人才。

1. EMPLOYMENT AND LABOUR PRACTICES

The Group had a total number of 21 employees as of 31 December 2019, and all of them are full time employees.



Employees by Geographical Regions
按地區劃分的僱員

Infographic 3 – Employees distribution by geographical regions
圖表3 –按地理區域劃分的僱員分佈

(a) Compensation and Other Benefits

In addition to the basic salaries, we established the discretionary annual bonus scheme which aimed at recognizing and rewarding employees for their excellence in these areas, e.g. general performance, contributions to the Group's business growth and their performance improvement from the previous calendar year. Moreover, we offer long-service awards to employees who have reached 5 years of service. We also show our appreciation to employees and congratulate them on material events such as marriage and new born baby – we offer these employees with gift vouchers. The Group adopts and operates a share option scheme, which serves as an incentive and reward to eligible employees who contribute to the success of the Group's operations.

1. 僱傭及勞工慣例

於2019年12月31日，本集團有合共21名僱員，全數為全職僱員。

(a) 薪酬及其他福利

除了基本薪金外，我們制定了一個酌情年度獎金計劃，旨在認可和獎勵於上一個曆年在整體表現、對本集團業務發展的貢獻和表現提升等範疇表現優秀的僱員。此外，我們為服務年資達5年的僱員頒發長期服務獎。為答謝僱員的付出和祝賀他們結婚及子女出生等重大慶典活動，我們會送上禮券。本集團採納及經營一項購股權計劃，作為對本集團業務營運成功作出貢獻的合資格員工提供激勵及獎勵。

(b) Recruitment, Promotion and Dismissal

We are committed to ensure our recruitment and promotion policies promote fairness and diversity. In this context, recruitment and promotion adopt various considerations, such as educational qualifications, relevant experience, skill competencies, desirable personal traits and potential for further development.

When filling any vacancies, we will give priority considerations to internal elevation than open recruitment when qualifications and performance from interviews, assessment tools and tests are equal. However, any internal transfer application must be endorsed by the applicant's immediate supervisor.

Termination of employment, either by the Group or the employee, shall comply with the agreed notice or by payment in lieu of notice, as well as relevant laws and regulations.

(c) Workings hours

We endeavour to promote better work-life balance for employees. We arrange work and allocate responsibilities properly so that employees can fulfil their duties within pre-defined working hours. Our remuneration systems are sufficient to include additional working hours in some working natures and positions. We promote flexibility in working hours for those departments require shift rotations under the coordination of department managers.

(b) 招聘、晉升及解僱

我們致力確保我們的招聘及晉升政策貫徹公平及多元化。就此而言，在招聘及晉升方面會考慮多項因素，例如學歷、相關經驗、技能能力、個人特質和進一步發展的潛力。

於填補任何職位空缺時，若申請人於面試、評核及測試的資格及表現相若，我們會優先考慮內部晉升再考慮公開招聘，惟任何內部調職申請必須經申請人的直屬主管批准。

無論本集團或僱員終止僱傭，均須遵守協定通知或支付代通知金，以及相關法例及規例。

(c) 工時

我們致力促進僱員享有更佳的工作生活平衡。我們恰當安排工作及分配職責，讓僱員能夠在預先訂明的工時內完成職務。就個別工種及職位而言，我們的薪酬制度已足夠包括額外工時。而須輪班工作的部門方面，我們在部門經理協調下推廣具彈性的工作時間。

(d) Rest days and Holidays

We provide employees with benefits as stated in the Letter of Employment or scales according to position ranking. For instance, statutory holidays, statutory maternity/paternity leave and the annual leave. In addition, we offer our employees with paid marriage leave and bereavement/compassionate leave which involve close family members. We provide paid statutory holidays to employees with reference to the local laws and regulations.

(e) Equal Opportunity, Diversity and Anti-discrimination

We advocate fair employment for each individual who works for us. We adopt the following equal opportunity principles in our workplace practices:

- Recruit, promote, and select employees on the basis of merit (such as skills, experience or ability to perform the job), without regard to factors such as age, gender, pregnancy status, marital status, ethnicity, disability, religious belief, colour, nationality race and geographical region.
- Provide employees with fair access to training and development based on their strengths and job functions.
- Reward and compensate employees fairly based on their ability, performance, contribution and experience.

In addition, we expect all employees to demonstrate appreciation, care and respect for each other, regardless of personal differences which are not related to job requirements or roles.

(d) 假日及假期

我們為僱員提供聘用通知書所列明的福利，或按職級增加，例如法定假期、法定產假／侍產假及年假。另外，我們為僱員提供有薪婚假，而僱員的直系親屬身故可獲提供有薪喪假／恩恤假。我們參考相關本地法例及規例提供有薪法定假期。

(e) 平等機會、多元化發展和反歧視

我們為每位為我們工作的人士提倡平等就業。我們的工作場所慣例已採納下列平等機會原則：

- 基於才能（例如技能、經驗或履行職務的能力）聘用、晉升及甄選僱員，不受年齡、性別、懷孕狀況、婚姻狀況、族群、殘疾、宗教信仰、膚色、國籍種族和地區等因素影響。
- 基於僱員的強項及職責，給予他們平等的培訓及發展機會。
- 基於僱員的能力、表現、貢獻及經驗公平給予獎賞及補償。

另外，我們期望所有僱員能彼此欣賞、關懷和尊重，不論與工作要求或職責無關的個人差異。

We welcome enquiries, grievances or complaints in respect of discrimination arising from recruitment, promotion, transfer, training, termination processes or decisions, or grievances related to sexual or disability discrimination, harassment and victimization in our workplace – employees can seek help from the Branch Manager or the Human Resources Department.

The Group did not identify any non-compliance cases noted in relation to employment and labour practices for the Reporting Period.

2. HEALTH AND SAFETY

We are committed to providing and maintaining a safe, healthy and hygienic workplace for all employees, and all other persons likely to be affected by our operations and activities.

We adopt an integrated approach to health and safety, where prevention of illness and injury forms part of the management practice. Employees are expected to exercise reasonable care and attention and avoid their subjection to risks that might lead to any accident or injury. There are evacuation procedures in case of fire in the offices. Corresponding administration and operation areas are also in place to assist employees in taking sensible immediate actions. All employees are expected to show their unconditional support to maintain a healthy and smoke-free working environment. Smoking is strictly prohibited in the office, toilets and stairwell areas.

For the Reporting Period, the Group did not identify any non-compliance incidents in relation to occupational health and safety that had a significant impact on the Group.

如懷疑在招聘、晉升、調職、培訓、終止合約過程或決策中受到歧視，或在工作場所遭到性別或殘疾歧視、騷擾及不合理對待，我們歡迎僱員提出查詢、表達不滿或作出投訴，僱員可向分區經理或人力資源部尋求協助。

於報告期間，本集團並無發現有關僱員和勞工慣例的不合規事件。

2. 健康及安全

我們致力為所有僱員及可能受我們的營運及活動影響的所有其他人士，提供並維持一個安全、健康及衛生的工作場所。

我們對健康和 safety 採取全面的措施，預防疾病和受傷是管理常規的一部分。僱員應保持合理謹慎及注意，避免承受任何可能導致意外或受傷的風險。我們已經制定應對辦公室、相應的行政及作業範圍發生火警時的疏散程序，以協助僱員採取明智、即時的行動。所有僱員應不遺餘力地打造一個健康及無煙的工作環境，嚴禁在辦公室、洗手間或梯間範圍吸煙。

於報告期間，本集團並無發現有關職業健康和 safety 並對本集團造成重大影響的不合規事件。

3. DEVELOPMENT AND TRAINING

We acknowledge the importance of providing employees with opportunities to pursue a meaningful and rewarding career. As such, this will help them to realize their potentials, and at the same time align with the Group's objective. Employees are expected to take the initiative to identify their own needs and improve their skills and knowledge in a gradual manner. Supervisors and managers shall ensure their subordinates are properly coached and guided. We will provide employees with professional training to meet their current and future business needs. During the Reporting Period, employees attended a seminar in relation to the anti-money laundering and counter-financing of terrorism policy.

All new employees are invited to attend the staff orientation. This could familiarize them with the Group's policies and employee's compensation and benefits. In addition, managers and supervisors will equip new employees with on-the-job training and other relevant coaching. During the coaching period, managers and supervisors are responsible for monitoring the training progress, while providing feedback, assistance, advice and assess the necessary knowledge and skills which are vital for the employees to perform their duties at the expected level of standard.

4. LABOUR STANDARD

We prohibit any child and forced labour in any of our operations and services. Labour being forced to work by means of physical punishment, abuse, involuntary servitude, peonage or trafficking is strictly forbidden.

The Group did not identify any non-compliance cases noted in relation to labour standard laws and regulations during the Reporting Period.

3. 發展及培訓

我們明白為僱員提供機會追求有意義和發展豐盛事業的重要性，藉此能協助僱員展現潛能，同時亦可配合本集團的目標。僱員應注意工作上對他們的要求，並逐步提升技能和知識。主管和經理亦要確保下屬得到合適的訓練和指導。我們為僱員提供專業培訓，以應付當前和未來的業務需求。於報告期間，僱員出席了有關打擊洗錢及應對恐怖分子資金籌集政策的講座。

所有新僱員均獲邀參加入職培訓以認識本集團的制度、員工薪酬及福利。另外，經理及主管會向新僱員提供在職培訓和其他相關的訓練。於訓練期間，經理及主管負責監察培訓進度，同時提供反饋、協助和意見，並評估僱員履行職責時所必須的知識和技能水平，確保達到預期的標準。

4. 勞工準則

我們禁止於任何營運及服務中聘用任何童工和強制勞工。我們嚴格禁止以體罰、虐待、非自願勞役、勞奴償債或人口販運之方式強迫勞動。

於報告期間，本集團並無發現有關勞工準則法例及規例的不合規事件。

5. SUPPLY CHAIN MANAGEMENT

We believe that building a sustainable supply chain can create value for our employees, suppliers, service providers, communities and our clients. We also emphasize on facilitating the interaction and communication with our suppliers and service providers. In order to establish an efficient and green supply chain with our suppliers and service providers, we aim at maintaining long-term strategic and co-operative relationships with those who process good credit history, solid reputation, high product or service quality, proven track records of environmental compliance and sound commitment to social responsibility. We conduct periodic reviews on the performance of our suppliers and service providers with the objective of better control and assurance on the financial products and service quality.

6. PRODUCT/SERVICE RESPONSIBILITY

We dedicate ourselves to provide high value-added financial products and high quality professional investment services with the highest degree of integrity to our clients at competitive rates. We always seek to exceed our clients' expectation. In terms of sustainability, client satisfaction is vital to our growth in the future. We summarize below our approach in achieving this aim and the significant efforts that the Group has put into its operations:

(a) Licences and Registrations

We have a global team of financial specialists. They hold necessary licenses that are required by laws and regulations and dedicate to provide quality professional investment services over a wide range of financial products. In addition, we conduct our supervisory work to ensure the fitness and properness of our financial specialists. For instance, they are mandated to undertake sufficient hours of continuous professional training per calendar year for each of the regulated activities. Training attendance records shall be submitted to our Compliance Officer, and when necessary, these records will be further examination by the regulatory bodies.

5. 供應鏈管理

我們相信，建立可持續的供應鏈可為僱員、貨品供應商、服務供應商、社區和客戶創造價值。我們亦強調促進與貨品供應商和服務供應商之間的互動和溝通。為了與他們共同建立有效的綠色供應鏈，我們與具有良好信用、穩健商譽、高質產品或服務水平、良好環境合規紀錄，以及堅守社會責任的公司保持長期戰略和合作關係。我們定期審查貨品供應商和服務供應商的表現，旨在更有效地控制和確保金融產品和服務的質素。

6. 產品／服務責任

我們一直堅持誠信，以具備競爭力的收費，為客戶提供高增值的金融產品和高質素的專業投資服務。我們追求卓越，努力超越客戶期望。我們深明客戶滿意度是未來業務可持續增長的關鍵。我們於下文概述實現這目標的方法及本集團於其營運所投放的重大努力：

(a) 牌照和註冊

我們擁有一支國際金融專才團隊，他們持有法例和規例要求的相關牌照，致力就各種金融產品提供優質專業的投資服務。此外，我們進行監督工作，確保我們的金融專材稱職合規。例如他們每年必須就每項受規管活動參加足夠時數的專業培訓，並須向合規主任提交培訓的出席紀錄，如有需要，相關紀錄將交由監管機構進一步審查。

(b) Client Asset Protection

In order to provide greater assurance for our clients' assets, we maintain customers' fund in segregated bank accounts, and require prior written approval for any movements thereof. We also established adequate internal controls and procedures which enable us to take reasonable steps to track the movement of customers' funds.

(c) Financial Products and Services Due Diligence

We would first understand the investment products before we recommend them to our clients. In addition, we offer services or products to our clients only when we have the relevant licence and expertise. Through understanding the investment objectives, the risk appetite and other relevant facts of our clients, we provide them with the most suitable products and services together with other relevant material information to help them make informed investment decisions. We ensure our advice to clients are honest and fairly expressed. We record and retain the reasons for each product recommendation made to every client.

(d) Secure, Stable, Effective and Efficient Trading Systems

We value the security of information system which contains the personal information, trading records of our clients and other information essential to the Group. The security of the application systems and networks are under internal round-the-clock monitoring as well as periodic independent professional reviews. We employed advanced encryption technology to ensure our client information is secured throughout the trading process.

(b) 客戶資產保護

為了更佳保障客戶資產，除了客戶資金的任何變動需要事先文件批准外，我們將客戶的資金存放於獨立的銀行賬戶。我們已建立充分的內部監控和程序，使我們能夠採取合理的步驟追蹤客戶資金的流向。

(c) 金融產品及服務的盡職調查

向客戶推薦投資產品前，我們會先瞭解該產品。此外，我們只會在擁有相關牌照和專業知識的情況下，才會向客戶提供服務或產品。透過理解客戶的投資目標、可承受的風險程度及其他相關事宜，我們為客戶介紹最合適的產品和服務，以及披露其他相關的重要資訊，以協助他們作出明智的投資決定。我們確保以誠實和公正的態度向客戶提供意見。我們會記錄及保存向每位客戶推薦各項產品的原因。

(d) 安全、穩定、有效及高效的交易系統

我們重視信息系統的安全性，包括客戶的個人資料、交易紀錄以及對本集團至關重要的其他資訊。我們對應用系統和網絡安全實施二十四小時內部監控，以及定期進行獨立專業審查。在整個交易過程中，我們採用先進的加密技術確保客戶資料的安全。

(e) Know Your Client

In order to provide the highest level of service and to establish good credit standing of our clients, we conduct the “Know Your Client” assessment prior to the registration of new client accounts. The assessment aims at understanding the identity, investment objective, risk tolerance level, investment experience, financial status, occupation and other relevant information of the clients, which requires relevant documents for identification proof. Periodic reviews are conducted to ensure our clients profiles are up-to-date.

(f) Customer Data Protection and Privacy Policies

We are committed to handle confidential information in relation to our clients and the Group with the highest integrity and discretion in accordance with applicable laws and regulations. Confidential information may be subject to disclosure requirements according to the applicable laws and regulations and shall be exchanged internally and exclusively on the “need-to-know” basis.

During the Reporting Period, there were no complaints received concerning breaches of customer privacy and loss of data.

(g) Customer Complaints

We have established the Complaint Handling Procedure Manual, which detailed the procedures in handling complaints. Employees are trained to handle client complaints in a prompt and courteous manner.

(h) Integrity

We acknowledge integrity is the key to sustainable growth. We are committed to conduct business with the highest degree of integrity and respect for rules, laws and regulations, in addition to our values. All employees, including directors, management members at all levels, general employees, temporary workers, trainees, interns, independent contractors and agent/consultants, are required to adhere to our internal Code of Conducts in letter and spirit.

(e) 瞭解你的客戶

為提供最佳的服務和建立客戶口碑，新客戶開立賬戶前，我們會進行「瞭解你的客戶」評估，評估目的除了取得相關文件以便識別和作為證明外，更可確認客戶身份、投資目標、風險承受能力、投資經驗、財務狀況、職業和其他相關資料。我們會定期進行審查，確保客戶檔案得以更新。

(f) 客戶資料保護和隱私政策

我們致力遵照適用法例及規例，以最高誠信和謹慎的態度處理有關客戶及本集團的機密信息。我們可能會根據適用法例和規例的要求披露此等機密信息，並只會在「需要知情」的基礎上作內部溝通。

於報告期間，並無收到關於違反客戶私隱和遺失數據的投訴。

(g) 客戶投訴

我們已編製「投訴處理程序手冊」，詳述處理投訴的程序。僱員均經過培訓，能及時和有禮地處理客戶投訴。

(h) 誠信

我們明白誠信是可持續增長的關鍵。除我們認同的價值外，我們亦堅持以最高誠信經營業務，並遵從規則、法例及規例。所有僱員，包括董事、各級管理層、一般僱員、臨時員工、學徒、實習生、獨立承包商及代理／顧問，都必須遵守我們的內部行為準則的字義及精神。

In case of arousing conflict from the internal procedures and the external rules, laws and regulations laid down by the governing authorities, the stricter one shall prevail, provided local laws and regulations are not violated.

(i) Compliance

During the Reporting Period, the Group did not identify any incidents of non-compliance with laws and regulations concerning the provision and use of products/services in relation to the Group.

7. ANTI-CORRUPTION

(a) Anti-money Laundering (AML) and Counter-Financing of Terrorism (CFT) Policy

We aim to maintain the highest standards of openness, uprightness and accountability and all our employees are expected to observe the highest standards of ethical, personal and professional conduct. We do not tolerate corruption, bribery, extortion, money-laundering and other fraudulent activities in connection with any of our business operations.

In order to protect the interests of stakeholders and comply with the laws and regulations, we have strict policies and procedures in place for transaction monitoring, for instance, the verification of clients' identities, assessment of clients' honesty, integrity, commercial ability and credit worthiness. We also have implemented procedures in relation to the internal reporting of suspicious transactions and submit to the appropriate authorities applied when necessary. To avoid dealing with potential money launderers, terrorist financiers or handling funds derived from any criminal activity, we refuse the operation of any accounts with regards to anonymous clients or whoever with obviously fictitious names. We provide appropriate trainings to employees in client service and administration, as well as the dealing department. These trainings enable them to understand the techniques in dealing with money laundering and financing of terrorism. In addition, we share periodic circulars to all employees, which could remind them their responsibilities and alert them any new techniques in handling money laundering.

如果內部程序與監管機構制定的外部規則、法例和規例存在任何衝突，則須遵守較嚴謹者，惟須確保並無違反地方法例和規例。

(i) 合規性

於報告期間，本集團並無發現違反有關本集團提供及使用產品／服務的法例和規例的事件。

7. 反貪污

(a) 打擊洗錢及恐怖分子資金籌集政策

我們的目標是秉持最高的開放、正直及問責標準，我們期望所有僱員恪守最高的道德、個人及專業操守準則。我們絕不容忍旗下任何業務營運牽涉貪污、賄賂、敲詐、洗錢及其他欺詐活動。

為了保護持份者的利益並遵守法例和規例，我們就交易進行監控均有嚴格的政策及程序，例如驗證客戶身份、評估客戶誠信、營商能力和信譽，我們還實施了內部通報，並在必要時向有關當局舉報。為避免捲入潛在洗錢活動、恐怖分子融資或處理任何來自犯罪活動的資金，我們拒絕為客戶開立匿名或虛假賬戶。我們已為客戶服務、行政以及交易部門的僱員提供適當培訓，讓他們充分掌握應對洗錢及恐怖分子籌集資金的技巧。此外，我們定期向所有僱員發出通知，提醒他們自身的責任，以及注意任何處理洗錢的新技術。

Employees are required to bring forward any suspicious transaction to the compliance manager for immediate attention and review. The compliance manager shall conduct a thorough investigation and determine whether suspicion remains, and further actions should be taken.

(b) Anti-corruption Measures

As an organization with high ethical standards, we require all employees to uphold the anti-corruption regulations in all places where the Group does business. The Group does not tolerate any forms of bribery or corruption.

In addition to the requirements of AML/CFT Policy mentioned above, we maintain an effective implementation of internal control policies and procedures for the prevention of corruption, frauds, bribery, extortion and any malpractice or unethical practices.

(c) Whistle-blower Procedures

We have established a written communication channel for whistle-blower who can be any employee, director or internal contractor of the Group, whether full time, part time or casual at any level of seniority, makes or attempts, whether anonymously or not, to disclose allegedly unacceptable conducts which are corrupt, dishonest or fraudulent activities; are illegal or breach any law or policy of the Group; or cause loss to the Group, or otherwise may be detrimental to its interests.

The whistle-blower may choose to send his/her written statement to the manager, Compliance Officer, Senior Management or the local human resources representative. The Group takes reasonable efforts to protect the whistle-blower's identity, if requested, subject to legal or regulatory constraints.

僱員如發現任何可疑交易，須通報合規經理以即時關注及審查。合規經理應徹底調查，並判斷是否仍有疑點及採取進一步行動。

(b) 反貪污措施

作為一間遵從高道德標準的機構，我們要求所有僱員遵守本集團所有營業地點的反貪污規例。本集團絕不容忍任何形式的賄賂或貪污。

除了上文所述的打擊洗錢政策／應對恐怖分子籌集資金的政策和程序外，我們制定一套有效的內部監控政策及程序，以預防貪污、欺詐、賄賂、敲詐和任何不當或不道德的行為。

(c) 舉報機制

我們已經為本集團的所有僱員、董事或內部承包商建立了一個書面舉報渠道，不論是全職、兼職或任何職級的僱員，均可以向集團舉報（不論匿名與否）任何涉嫌貪污、不誠實或欺詐的不當行為；違法或違反本集團任何規章制度或政策；或可能導致本集團蒙受損失，或以其他方式損害其利益的活動。

舉報人可以將其書面陳述發送給經理、合規主管、高級管理層、或當地人力資源代表。本集團亦會按舉報人的意願，在法律或法規容許的情況下，採取合理措施保障舉報人的身份。

The whistle-blower is protected from unjustified/ unfair disciplinary action or other improper employment practices if the disclosure is made in good faith and/or is based on reasonable grounds. Any employees who knowingly makes false or reckless allegations shall be subject to disciplinary actions including termination of employment.

(d) Compliance

During the Reporting Period, no legal cases regarding corrupt practices were brought against CLSA Premium or its employees.

8. COMMUNITY INVESTMENT

We believe that a sustainable business is dependent on the stability and well-being of the community and we support long-term community investment by encouraging our staff to actively participate in charitable activities.

如果有關舉報是誠實和／或建基於合理懷疑，舉報人會受到保護，免受不合理／不公平的紀律處分或對待。任何僱員故意作出虛假或罔顧後果的指控，需接受紀律處分，包括終止聘用。

(d) 合規性

於報告期間，CLSA Premium及其僱員並無涉及關於貪污的法律檢控案件。

8. 社區投資

我們相信可持續發展的業務有賴社區穩定和福祉。我們鼓勵僱員積極參與慈善活動，支持長期社區投資。





CLSA Premium Limited

