



**Directel Holdings Limited**  
**直通電訊控股有限公司**

(Incorporated in the Cayman Islands with limited liability)

(Stock Code : 8337)

# 2020 ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT



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# 1. About the Report

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## Introduction of the Report

Directel Holdings Limited (the “Company”) and its subsidiaries (together referred to as the “Group”) are pleased to present the Environmental, Social and Governance (“ESG”) report (the “Report”). This Report summarizes the environmental and social impacts, policies and initiatives of the Group during the financial year of 2020 which began on 1 January 2020 to 31 December 2020 to demonstrate our long-term commitment in ensuring that our business are economically, socially and environmentally sustainable.

In preparing this Report, the Group has complied with the “Comply or Explain” provisions in accordance with the Environment, Social and Governance Reporting Guide (the “Guide”) as set out in Appendix 20 to the Rules Governing the Listing of Securities on GEM of The Stock Exchange of Hong Kong Limited (the “Stock Exchange”) (the “GEM Listing Rules”) and in accordance with the practical circumstances of the Company. Key Performance Indicators (“KPI”) specified in the “Recommended Disclosures” under the Guide are adopted to enable completeness of the Report. A complete list of index in compliance with the Guide is also available at the end of this Report for reference.

The board (the “Board”) of directors (“Directors”) of the Company acknowledges its responsibility for ensuring the integrity of the ESG Report and to the best of its knowledge, this Report addresses all material issues in respect of our ESG obligations and fairly presents the ESG performance and commitment of the Company. The Board confirms that it has reviewed and approved the Report.

## Reporting Scope

The scope of this Report includes the environmental and social performance of the main operations of the Group in Hong Kong, the People’s Republic of China (“PRC”), and Singapore which includes the provision of mobile telecommunications services, distribution of mobile phones and electronic products and distribution of mobile and data top-up e-vouchers.

## Report Structure

The first section of the ESG Report outlines our approach in respect of our ESG obligations and the methodology in identifying our stakeholders. The remaining sections detail our management approach and performance relevant to materiality and significant issues of ESG.

## 2. Our ESG Approach

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The Group continues to refine our management approach to adapt to the changing ESG landscape and align ourselves with international best practices. The Group has in place a comprehensive system comprising principles, policies, and guidelines to ensure that we address key issues pertinent to our business and perform credibly to stakeholders' expectations. The Group is committed to maintaining good corporate governance and business integrity in all our business activities.

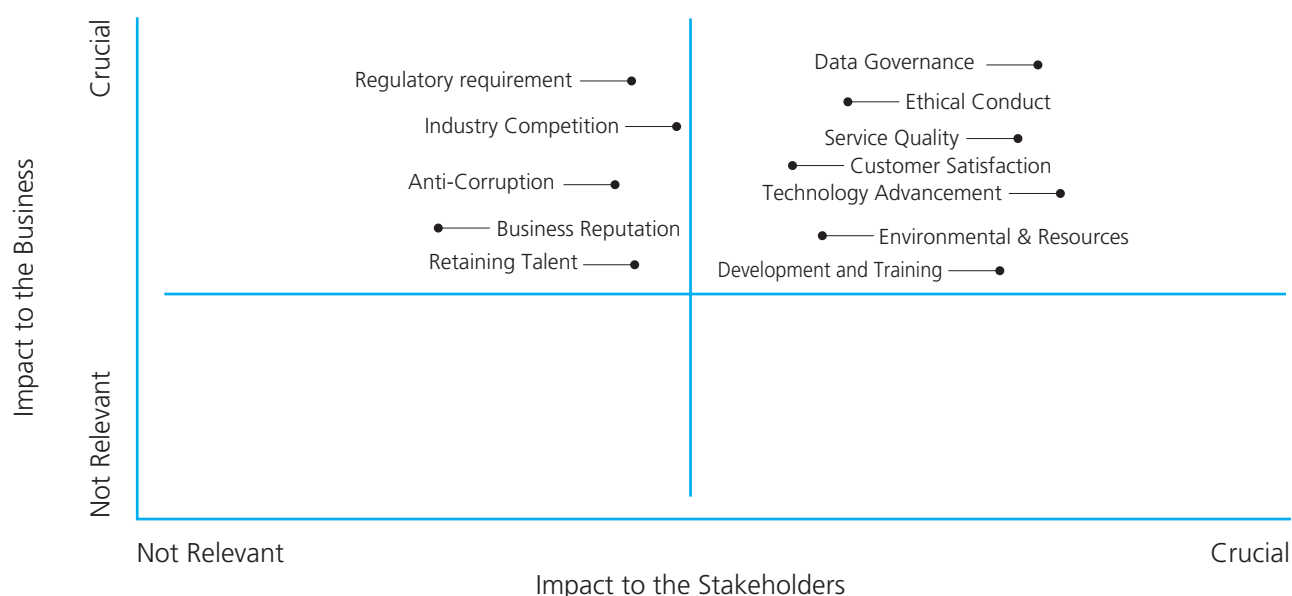
### 3. Stakeholder Engagement

The Group values its stakeholders and their views relating to its businesses and environmental, social and governance issues. To understand the concerns of various stakeholders, the Group have engaged and discussed with various business functions and management personnel to communicate with its key stakeholders, including but not limited to employees, investors, customers, suppliers, government bodies and communities through different channels such as conferences, electronic platforms and public events. In formulating operational strategies and environmental, social and governance measures, the Group takes into account the stakeholders' expectations and strives to improve its performance through mutual cooperation with the stakeholders, with a view to driving long-term prosperity and creating greater value for the community.

Stakeholder	Engagement Method	Topics	Action
<b>Shareholders</b>	Investor relations communication, Shareholder meeting	Financial performance Governance	We provide information on strategies, policies, and performance through our quarterly report, interim report, annual report and announcements.
<b>Employees</b>	Meeting and Staff interview	Career Training Health and Safety Workplaces	We provide training, promotion, decent wages, safety and respectful workplace.
<b>Customers</b>	Business relationship/ Feedback	Service quality Reliability Price	We provide quality and consistent roaming service. And we develop product and services for different target groups to suit their needs.
<b>Industry</b>	Forum	Technology Industry Standard	We engage with sector peers, and telecommunication specific association to understand the latest technology development.
<b>Government</b>	Notice	The PRC and Hong Kong's telecommunication sector arrangement Tax	Our business operation are regulated under the Communications Authority ("CA"). We participate in developing the cross-border roaming service.
<b>Suppliers</b>	Business relationship	Quality New Technology	We take advantage of the advancement of technology to enable our telecommunication roaming service to thrive.

## 4. Materiality Assessment

In the preparation of this Report, the Group has identified and determined twelve ESG issues pursuant to the Group’s actual business situations and industry characteristics. We invite stakeholders to score the materiality of these twelve issues, and then comprehensively consider the scores given by stakeholders against the Group’s sustainable development goals, afterwards conclude and determine the ranking of materiality for the reported issues and prepare the materiality matrix. This Report elaborates on our selected materiality issues and considers the issues of highest concerns to stakeholders as the material reporting content.



Overall, the most material issues remained largely unchanged since last year. Below are the material issues we would like to elaborate further.

1. Industry Competition – Rapid changes in telecommunication technology lowered the barriers to entry and increased the fierce competition of the industry. Customer’s expectation is also continually changing and they are demanding more. We need to take steps to improve our capability, especially in Internet of Things (“IOT”).
2. Major regulatory requirement – Regulatory or policy change may directly impact our strategy and business model as well as increased complexity and the cost of doing business especially many of our services are for users to uses across the border. We need to proactively maintain communications with relevant regulatory stakeholders and policymakers.
3. Talent – The transformation and innovation require us to retain our workforce so we can realize our marketing plan and adapt to the changing operational environment.
4. Data Governance – Although we are a mobile virtual network operator (“MVNO”), we need to ensure our IT system and the service providers are able to protect the data and system from cyber-attack which could bring disruption in our operations and leakage of sensitive information.

## 5. Environmental

The Board of Directors acknowledges well the importance of performing as a responsible corporate citizen. The Group has been implementing environmental protection and energy saving measures, where practicable to improve the efficiency of resources consumption. In establishing internal policies, the Group has strictly complied with the relevant laws and regulations on environmental protection implemented by the government. The Group will review the workflow process and the execution of relevant measures from time to time to ensure consistent implementation of the relevant policies. During the reporting period, there was no material non-compliance with relevant laws and regulations relating to environment.

### 5.1 Emissions

The Group is principally engaged in the business of (i) provision of mobile telecommunications services, (ii) distribution of mobile phones and electronic products and (iii) distribution of mobile and data top-up e-vouchers. The working environment of the Group is indoor offices located in Hong Kong, the PRC and Singapore without any industrial plants and therefore, there is no significant hazardous waste, air emissions or waste water generated directly from our operation, except for greenhouse gas (“GHG”) emissions and non-hazardous waste.

#### 5.1.1 Greenhouse Gas Emissions

The consumption of electricity at the offices is the primary source of our greenhouse gas (“GHG”) emission. The second primary source of GHG emission is the consumption of petrol for the Company’s vehicles. During the reporting period, the Group’s greenhouse gas inventory was compiled and organized according to ISO14064 standards and includes Scopes 1 and 2 emissions calculation. The Group’s GHG emissions equated to a total of approximately 21.45 tonnes of CO<sub>2</sub> equivalent (“tCO<sub>2</sub>e”) and the detailed summary of the GHG emission is shown as below:

	Amount	Intensity (Consumption/ Headcount)
<b>Scope 1 Direct GHG emission</b> Petrol consumption	9.39 tCO <sub>2</sub> e	0.408 tCO <sub>2</sub> e
<b>Scope 2 Indirect GHG emission</b> Electricity consumption	12.06 tCO <sub>2</sub> e	0.524 tCO <sub>2</sub> e
<b>Total GHG emission</b>	21.45 tCO <sub>2</sub> e	0.932 tCO <sub>2</sub> e

The Group has implemented a number of measures to mitigate energy consumption and reduce our GHG emissions such as turning off the air-conditioning system at night or when leaving office, keeping the office temperature at 25°C in summer and using LED lights or energy-saving light in the office, etc. Please refer to the “Use of Resources” section below for detailed measures implemented.

## 5.1.2 Waste Management

The nature of the principal operating activities of the Group does not involve significant consumption of electricity and natural resources. The business operations of the Group produced no hazardous waste, e.g. chemical wastes, clinical wastes and hazardous chemicals. The Group pursues and actively implement the principle and practice of recycling and saving. The Group also promotes eco-friendly measures to reduce disposal of non-hazardous waste in our business operation.

With decreasing availability of suitable land for landfill and increasing environmental impacts of waste disposal, waste reduction is one of the priority objectives of the Group. The non-hazardous wastes generated by the Group’s operations mainly consist of paper and printing supplies of our office during the reporting period.

We regularly monitor the consumption volume of paper and our consumption of printing supplies and have implemented a number of reduction measures. The Group’s office has also provided suitable facilities and encouraged our staff to sort and recycle any wastes we produced in our business operation to achieve the objectives in mitigating wastes, reusing and recycling to the fullest extent possible. The Group maintains high standard in waste reduction, educates its employees the significance of sustainable development and provides relevant support in order to enhance their skills and knowledge in sustainable development.



Apart from recycling, the Group has implemented various programs to encourage employees to participate in waste reduction management, including:

- 1) Encourage double-side printing and reuse of waste paper. Paper for single-side printing would be only adopted when handling official documents and confidential documents when necessary;
- 2) Purchase green and environmental printing paper;
- 3) Encourage to use electronic channels for internal correspondence and communication;
- 4) Place "Green Message" reminders on office equipment;
- 5) Waste paper are collected by recycling collectors; and
- 6) Used printing supplies boxes and toners will be returned to printing supplies companies for recycling and reuse.

Through the above mitigation measures, the Group believes that it will change the behaviour of the use of resources in our workplaces and achieve the goal of waste reduction in the coming years.

## 5.2 Use of Resources

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The Group strives to use resources effectively and minimize the discharge of wastes. In the ordinary course of business, we have implemented various energy saving and emission reduction measures. Apart from the waste reduction actions mentioned above, the other relevant examples are as follows:

- 1) Keep indoor air-conditioning temperature at 25°C during summer;
- 2) Encourage staff to shut down computers after work and switch off the lights if the employees are expected to be away from the room for more than one hour;
- 3) Replace the lighting system in the office by LED lights gradually; and
- 4) Encourage staff to switch office equipment, such as printers and computers, to energy saving mode (the equipment will enter the sleep mode under the standby condition).

## 5.2.1 Energy Consumption

Due to the Group's business nature, the level of energy consumption, such as electricity consumption and water consumption are considered relatively low, in particular our water consumption is very minimal. Electricity consumption and petrol consumption constitute the substantial part of the carbon emissions for the Group. As mentioned in the above section, the Group has formulated policies and guidelines relating to the environmental management, including energy management. Since the implementation of such initiatives, we have managed to lower our electricity consumption accordingly.

The electricity consumption is the largest source of GHG emissions. During the reporting year, the Group's consumption in electricity was as below:

Energy	Amount	Intensity (Consumption/ Headcount)
<b>Electricity Consumed</b>	16,767 kWh	729 kWh

The Group's Hong Kong office has provided vehicles for our management to use in relation to company affairs. This is the second largest contributor to our emissions profile. During the reporting period, the vehicles consumed approximately 4,231 litres of Petrol. The Group's vehicles conform to Hong Kong vehicle emission standards.

Energy	Amount	Intensity (Consumption/ Headcount)
<b>Petrol Consumed</b>	4,231 litre	184 litre

The Group strives to utilize video conference to minimize face-to-face meeting in order to reduce petrol consumption in traveling and unnecessary business trips to mitigate the energy consumption. The Group encourages a low-carbon corporate culture and resources saving in daily office operation, which can increase our employees' awareness in energy conservation. Since the implementation of such initiatives, we have managed to lower our petrol consumption accordingly.

## 5.2.2 Paper usage

Efficiency in usage of paper has been promoted and communicated to staff. We encourage to use electronic documents to replace hardcopies and printing with double-sided paper. The used single-sided paper is collected for reuse. By these measures, the paper usage of the Group was approximately 46 reams (23,000 sheets) A4 paper during the reporting period. With the above initiatives, we are confident that the usage will be reduced in the coming years.

### 5.2.3 Water consumption

As the Group's business mainly focus on provision of mobile telecommunications services and distribution business and the working environment is mainly indoor offices, the Group does not consume a significant amount of water in its business activities. In addition, water consumption in our Hong Kong, the PRC and Singapore offices are paid by the management companies of respective buildings, and given that our water consumption is minimal, we did not measure the amount of water consumed by the Group. There was no issue in sourcing water that is fit for our purpose. Regardless of limited water consumption, we strive to encourage water conservation. Pantries in our office are posted with environmental messages to remind employees for water conservation, which results in enhancing our employees' awareness in water conservation.

### 5.2.4 The Use of Packaging Materials

Well-designed packaging saves resources by minimizing waste from the packed product. We have optimised our SIM card packaging into a thin tight and light packaging with minimal waste. Previously, SIM card packaging included welcome and instructional information, but most users have the SIM card activated and inserted in their phone sets they didn't need a full instruction. Hence, we have minimised our packaging. We hope the changes of our SIM card packing can save the packaging material.

During the reporting period, we have consumed 62 kg of paper wrapper for our Sim cards packaging, and 1,000 pieces of A4 marketing posters for our distributors to promote our roaming services.

## 5.3 The Environment and Natural Resources

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The Group is committed to the protection of the environment. We encourage the saving of natural resources by enhancing the staff awareness and reviewing the business operations efficiency regularly. We have been adopting environmental friendly practice in various aspects. During the reporting period, we complied with all relevant environmental rules and regulations in Hong Kong, the PRC and Singapore. The Group was not aware of any material non-compliance with environmental laws and regulations relating to the air and greenhouse gas emissions, discharges into water and land, and generation of hazardous and non-hazardous waste that would have a significant impact on the environment and natural resources. With the integration of policies and measures mentioned in above sections headed "Waste management" and "Use of resources", the Group will continue to adopt environmental friendly measures and actions and strive to minimize the impacts of our business development on the environment and natural resources.

## 6. Social

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### 6.1 Employment

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#### 6.1.1 Employment Practices

As a MVNO, we are facing a rapid change of mobile telecommunications technology and a highly competitive industry. To attain these challenges, we need to rely on our dedicated and highly skilled employees. We, therefore, attach great importance to our human resources (HR) management, from recruiting to targeting professionals and training offers, support for employees career development, as well as retention measures for executives and employees with high potential.

The guiding principle of our HR management is that we regard our employee to be our most valuable asset. We aim to be a fair and attractive employer. We believe the importance of having a vibrant, harmonious and inclusive workplace where our employees can work comfortably. Our objective is to attract, cultivate and retain talented employees over the long-term period.

During the reporting period, the Group has not discovered any material non-compliance of employment and labour related laws and regulations.

#### 6.1.2 Employee Profile

The Group is committed to maintaining a diverse workforce and ensure that employees will not be discriminated due to their race, age, sex, marital status, religion or belief. In the "Corporate System and Code of Conduct" of the Group, it has clearly stated the management procedures for employee recruitment, selection and departure, employee remuneration and appraisal system.

During the reporting period, we had a total workforce of 23 employees, 12 of them are located in the PRC office, 1 of them in Singapore, and the remaining 10 of them are from our Hong Kong head office. While for the gender balance, our workforce had 11 females and 12 males. This equates to a female to male ratio of 47.8% to 52.2%. Below is the composition of the employees:

	Number of employee(s)
Total Workforce	23
<b>By Gender</b>	
Total Male Employees	12
Total Female Employees	11
<b>By Age</b>	
Below 25 years old	2
25 – 34 years old	5
35 – 44 years old	5
45 – 54 years old	8
55 years old or above	3
<b>By Employment Mode</b>	
Full time	22
Part-time	1
<b>By Level</b>	
Management	6
Non-management	17
<b>By Location</b>	
Hong Kong	10
The PRC	12
Singapore	1

### 6.1.3 Employee Turnover Rate

The employee turnover rate refers to the percentage of employees who leave an organization during a certain period of time. It usually includes voluntary resignation, dismissals, and retirements in the calculations. Employee turnover rates can vary widely across industries. Our employee turnover rate during the reporting period is approximately 9% where 2 people had left the Group during the reporting period.

Number of employee(s)	
Employee Turnover Rate	2
Employee Turnover Rate by Gender	
Male	1
Female	1
Employee Turnover Rate by Age Group	
35 – 44 years old	1
45 – 54 years old	1
Employee Turnover Rate by Location	
The PRC	2

### 6.1.4 Remuneration and Benefits

We emphasise on the principles of consistency and fairness in respect of our remuneration management. We offer competitive remuneration to our employees according to their respective academic qualification, expertise and professional experience of individuals, and with reference to relevant factors including but not limited to prevailing market rate, remuneration benchmarks in the industry and government regulations. Besides, race, religion, gender and marriage status of the employee will not be taken into account when we select our employees. In order to maintain the competitiveness of our employees, the Group will conduct performance appraisal annually and adjust the remuneration and benefit of each employee based on the respective appraisal results. The content and criteria of performance appraisal are determined according to the businesses of various departments and the nature of different job positions. In addition to basic salary, employees are also entitled to receive performance-linked business bonus. Employees with outstanding performance will receive bonus or promotion plus salary increase as rewards.

Employees are also entitled to enjoy paid leaves pursuant to relevant laws and regulations, such as statutory holidays, work injury leave, marriage leave, maternity leave and sick leave, etc. Employee compensation, working hours, rest period, welfare and other employment practices are clearly stated in the Staff Handbook of the Group.

During the reporting period, the Group has not discovered any material non-compliance of employment labour related laws and regulations.

## 6.2 Health and Safety

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Health and safety in the workplace is part of our duty of care for employees. As a responsible employer, we are committed to reducing accidents, illness, and risks in the working area as far as possible, promoting the health of our employees, and thus also reducing the absence rate and employee turnover rate. We focus on two major areas to minimise occupational hazards and health and safety risks:

1. Occupational health management; and
2. Workplace safety at our office including fire protection measures.

Although the nature of jobs in the Group are low-danger positions, we do not take this lightly. The Group evaluates and identifies the risk of safety in various facilities and premises of work, and precautionary measures are recommended accordingly. For example, regular checks will be conducted on first aid kits and fire services equipment to ensure they are placed in a prominent position and are properly maintained. Medical insurances have been purchased for all our employees against any clinical, hospital and surgery costs. On the other hand, festival and casual gatherings such as Chinese New Year and Christmas gatherings have been organised to increase the harmonious spirit of the staff and can achieve a synergistic result to improve productivity and employee retention.

For fire prevention, the Group participates in fire drills organized on regular basis by the building management every year, and conducts post-event evaluation on the efficiency and smooth process of the fire drill to make improvements. Focus of attention is on the emergency evacuation route and whether all employees can reach the gathering point within time limit. We also evaluate the safety system of the Group on regular basis with follow-up actions to create a safe and healthy working environment for employees.

During the reporting period, the Group has achieved zero work-related fatalities and lost days due to work injury and did not discover any material non-compliance of occupational health and safety related laws and regulations.

## 6.3 Development and Training

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The Group had put in learning and development measures for our employees and help them grow in line with their respective tasks. The training can strengthen their sense of responsibility and willingness to learn and encourage employees the continuance of learning at every stage of their development.

The Company has provided suitable trainings across different operational functions, including induction training for new employees, technical training, and training to enhance the employees' knowledge in safety measures when performing their duties. Contents of trainings include on-the-job trainings at various levels as well as internal and external courses, with contents including management and skills. A regular performance appraisal system has been set up to evaluate and understand the individual performance to consider if re-training will be arranged for employees who have failed the appraisal.

During the reporting period, our employees have an average of 2.57 training hours annually and 92% of the employees undertook the training including senior-level employees. The training plan includes the skills required for upcoming tasks and company-wide management training.



## 6.4 Labour Standard

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The Group strictly abides by the relevant employment and labour laws and regulations and has never employed any child labour under 16 and using of forced labour. It has formulated clear policies to prevent compulsory labour and employment of child labour, make sure that our employee enjoys their fundamental rights related to labour and has insisted on monitoring the recruitment process frequently to prevent the occurrence of illegal conduct. Our Code of Conduct and employment contract sets out our general approach regarding labour standards.

In addition to our code of conduct, our human resource policy also covers the labour standard. The policy provides the framework of rules applicable to all HR activities within our operations.

During the reporting period, the Group did not discover any material non-compliance of labour rights and labour related laws and regulations.

## 6.5 Supply Chain Management

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The Group believes that proper management of its supply chain could bring positive impacts to the social environment and a stable and long-term cooperation relationship with suppliers would enhance the standard of operation and services of the Group. We work together with a number of business partners. These include IT hardware manufacturers, as well as vendors and telecommunications service providers. Ensuring the integrity of our business partners and avoiding potential liability risks or reputational damage, is of fundamental importance to us.

During the reporting period, the Group has a total of 34 suppliers, among which 15 are located in the PRC, 17 are from Hong Kong and 2 from Singapore.

The Group has established the relevant policy on supply chain management, such as the Procurement Management Rules of the Group which have explicitly stated, among other things, the method of procurement, selection of suppliers, review and approval process and management, to ensure that the process is fair and transparent.

In the process of supplier selection, the Group must firstly consider whether the manufacturer has relevant qualifications (such as ISO9001), whether capital funding is sufficient, and whether it is capable of dealing with the number of orders, and secondly whether it can satisfy our needs in technical aspects, and whether the after sales service is comprehensive, etc. Furthermore, we will also require the supplier to provide samples for inspection, after the samples have passed the inspection tests, we will visit the plant of the supplier for site inspection. Critical areas include privacy and information security, fraud and corruption are closely monitored. We strengthen this approach through our supplier program to improve our monitoring of risk across our supply chain.

## 6.6 Product Responsibility

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Our customers want to be able to access the best products and services and expect them to work where they want, when they want, in the way they want. Our marketing plan is designed to deliver this to our customers, with good roaming experiences and services that offer the greatest value and enjoyment and work without failure.

As a MVNO, we are always looking for ways to make our products more accessible. For example, our OTA-Sim Mobile Communications + Internet Cross Border Enabling Services that make connection easier for people in Greater China region, coverage includes the PRC, Hong Kong, Macau, and Taiwan. Below is our product introduction:

- Our International Student Service provides students who travel to overseas to further study to get connected with their family using our Directel FollowMe and OTA-Sim technology to roam and making call back home.
- Our Global Hotel Channel Business make our custom made cell phones with OTA-Sim cards available to Chinese customers through Hotel Channel. They can instantly get connected and call back home.

- Our New Roaming, New Travel, and New Life is our service Directel response to the Belt and Road initiatives that launched by the PRC Government. The aim is to provide full coverage to the countries along the belt and road. The product we offer will be Application Scheme Based on OTA-SIM, which can support application data, payment gateway, traveling booking, car networking, and IOT applications.
- New mobile roaming application DIRECT-TX, for users to make calls through the application in the broadened coverage.
- Distribution of mobile top-up and data top-up e-vouchers sourced from the dealers of the 3 major mobile network operators in the PRC and resale to ultimate users through the e-commerce platform which is connected to various online payment platforms.
- Selling of Singapore mobile top-up and data top-up e-vouchers through one of the largest Singapore e-commerce platforms.

During the reporting period, our Group complied with relevant laws and regulations relating to product responsibility such as health and safety, advertising, labelling and privacy matters. No sold or delivered products recalled and complaints received about the products or services due to safety and health reasons.

### 6.6.1 Customer Satisfaction

Customer demands regarding connection are growing steadily. Our roaming connection made possible by our growing satellite and ground network to ensure the connection quality. The feedback and satisfaction of our customers are particularly important to us as it helps us to monitor product and service quality and invest in the right technology. We strive to raise customer satisfaction via numerous programs, such as develop product to meet customer demand. Only satisfied customers provide us with the long-term relationships we need to ensure the sustainability of our business. Our aim is to conclude contracts with customers and to provide them with clear and understandable information during the ordering process without any further intermediate steps.

## 6.6.2 Services Complaint

In relation to service support, the Group has outsourced its customer support services to a call center to handle customer service request, support, and complaints. In the event of quality issues, customers can reach out to our customer service team through the hotline to provide feedbacks. Our customer service team will provide support and solution to help customers to resolve any issues. For hardware or Sim-Card problems, customers can return the product and we will replace a new one. All the issues will be handled by our customer service team within a set of service time frame.

## 6.6.3 Intellectual Property

The Group understands that intellectual property rights constitute a valuable company asset. We thus strive to both protect these rights and use them effectively. Our Group's policy on intellectual property states that we will respect others' intellectual property rights and ensure that our product invention does not infringe on these rights.

While for our developments, our legal consultant is managing the variety of intellectual property matters including filing and acquisition of patents.

We will continue to strive to better manage our intellectual property rights by acquiring and using a greater number of patents and higher quality patents.

## 6.6.4 Customer Data Privacy

The Group's position on privacy is clear. We undertake to ensure the proper use of personal data in our business operations by observing the requirements of the relevant laws and regulations, in particular the Personal Data (Privacy) Ordinance.

We have data security policy in place to protect the data of both our employees and our customers. We want to ensure that we can follow the rapid development of technology and services by early involvement of security in business processes. We aim to ensure a strong level of protection in terms of confidentiality, integrity, and availability of services and data.

Across our markets, we observed that governments and regulators taking new steps to strengthen privacy regulation and to introduce new measures that affect our ability to manage our customer's data. This trend is expected to continue and the Group will also step up its focused work on privacy, security to meet both regulatory requirements and the expectations of customers.

During the reporting period, the Group did not discover any circumstance of consumers' personal data being stolen, altered, damaged or leaked.

## 6.7 Anti-Corruption

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The Group maintains and effectively implements a comprehensive system of internal control and stringent policies for anti-corruption, and is committed to prevent and monitor any malpractices or unethical practice.

The Group has strictly complied with ethical requirements and there was no occurrence of corruption, bribery, fraud and money laundering throughout the reporting period. The Group will adhere to its corporate ethics and uphold its reputation to prevent corruption.

The Group's anti-corruption awareness training for employees ranges from on-boarding and yearly reminder programs. The purpose of the program is to help all employees understand the Group's values and the policy. Integrity is a vital part of the Group's business. The Group's management is committed to sending clear, and regular message to all employees and business partners that corruption and bribery are unacceptable.

Employees can report to the management of the Group with respect to any non-compliance such as receiving bribes, abuse of power by mail, electronic mail or phone. All business units have a responsibility to conduct regular risk assessment of their anti-corruption procedures and implement remediating measures to mitigate risks.

During the reporting period, the Group complied with relevant laws and regulations relating to bribery, extortion, fraud and money laundering.

## 6.8 Community Investment

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The Group believes that participating in community activities can help promote harmony in social development, fulfill our responsibilities as a corporate citizen and also demonstrate the Group's promise to society. Hence, we encourage employees to participate in social and charitable activities, such as youth education or caring for the elderly, etc. To encourage participation of employees in community services and meaningful charitable work, we allow employees to apply for volunteer holidays.

# Stock Exchange ESG Reporting Guide Content Index

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KPI B1.2	Employee turnover rate by gender, age group, and geographical region.	13
<b>Aspect B2: Health and Safety</b>		
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 providing a safe working environment and protecting employees from occupational hazards.	14 – 15
KPI B2.1	Number and rate of work-related fatalities.	15
KPI B2.2	Lost days due to work injury.	15
KPI B2.3	Description of occupational health and safety measures adopted, how they are implemented and monitored.	14 – 15

<b>Aspect B3: Development and Training</b>		
General disclosure	Policies on improving employees' knowledge and skills for discharging duties at work. Description of training activities.	15
KPI B3.1	The percentage of employees trained by gender and employee category.	15
KPI B3.2	The average training hours completed per employee by gender and employee category.	15
<b>Aspect B4: Labour Standards</b>		
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 labor.	16
KPI B4.1	Description of measures to review employment practices to avoid the child and forced labor.	16
KPI B4.2	Description of steps taken to eliminate such practices when discovered.	16
<b>Aspect B5: Supply Chain Management</b>		
General disclosure	Policies on managing environmental and social risks of the supply chain.	16 – 17
KPI B5.1	Number of suppliers by geographical region.	16 – 17
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.	16 – 17
<b>Aspect B6: Product Responsibility</b>		
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 health and safety, advertising, labeling and privacy matters relating to products and services provided and methods of redress.	17 – 19



KPI B6.1	Percentage of total products sold or shipped subject to recalls for safety and health reasons.	N/A
KPI B6.2	Number of products and service related complaints received and how they are dealt with.	19
KPI B6.3	Description of practices relating to observing and protecting intellectual property rights.	19
KPI B6.4	Description of quality assurance process and recall procedures.	17 – 19
KPI B6.5	Description of consumer data protection and privacy policies, how they are implemented and monitored.	19
<b>Aspect B7: Anti-corruption</b>		
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 bribery, extortion, fraud and money laundering.	20
KPI B7.1	Number of concluded legal cases regarding corrupt practices brought against the issuer or its employees during the reporting period and the outcomes of the cases.	0 CASE
KPI B7.2	Description of preventive measures and whistle-blowing procedures, how they are implemented and monitored.	20
<b>Aspect B8: Community Investment</b>		
General disclosure	Policies on community engagement to understand the needs of the communities, where the issuer operates and to ensure its activities, take into consideration the communities' interests.	20
KPI B8.1	Focus areas of contribution (e.g. education, environmental concerns, labor needs, health, culture, sport).	20
KPI B8.2	Resources contributed (e.g. money or time) to the focus area.	20

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