HONG KONG ZCLOUD
TECHNOLOGY CONSTRUCTION LIMITED
香港智雲科技建設有限公司

(incorporated in the Cayman Islands with limited liability)

Stock Code : 9900

2024-25

Environmental, Social and Governance Report

Contents

About This Report

Hong Kong ZCloud Technology Construction Limited (formerly known as Gain Plus Holdings Limited) (the "**Company**" together with its subsidiaries referred to as the "**Group**") is pleased to present the annual Environmental, Social and Governance Report for year ended 31 March 2025 (the "**ESG Report**") to provide an overview of the Group's management of significant issues affecting the operation, including environmental, social and governance ("**ESG**") issues.

Board Statement

The board of directors of the Company (the "**Board**") recognises the importance of sustainable practices and is committed to integrating ESG systems into its decision-making processes. The Board bears ultimate responsibility for overseeing the Group's ESG-related risks and opportunities, which includes formulating and approving ESG-related strategies and objectives, as well as evaluating the Group's progress in achieving its ESG-related targets and goals.

Environmental, Social and Governance Structure

The Board has an overall responsibility for the Group's ESG strategy and reporting. The Board is responsible for evaluating and determining the Group's ESG-related risks and ensuring that appropriate and effective ESG risk management and internal control systems are in place. The Executive Directors of the Company are responsible for formulating ESG management policies, strategies, goals, and annual reporting and promoting related implementation. They also identify, evaluate, review, and manage major ESG issues, risks, and opportunities while other departments are responsible for organising, promoting, and implementing various ESG-related tasks under the Group's ESG management policies and strategies. All tasks will be reported to the Board regularly in order to review and re-formulate the policies and plans for achievement of goals and targets.

The Group has set short-term and long-term sustainable development vision and goals to achieve ongoing emission reduction. Relevant emission reduction targets and corresponding strategies are established and sustainable development factors have been incorporated into the Group's strategic planning, business model and other decision-making processes. The Board regularly monitors and reviews the effectiveness of management approach, including reviewing the Group's ESG performance and adjusting corresponding action plans.

Reporting Period

The ESG Report illustrates the Group's initiative and performance regarding the environmental and social aspects during the reporting period from 1 April 2024 to 31 March 2025 (the "**Reporting Period**").

Reporting Scope

This ESG Report covers all subsidiaries of the Group in Hong Kong with core business that principally engaged in provision of building construction services and repair, maintenance, addition and alteration services ("**RMAA Services**"), with its main office located in Hong Kong which accounts for the most material revenue of the Group and the number of employees in the above business constitutes 100% of the total number of employees of the Group during the Reporting Period. Other business and offices of the Group would not be included in this ESG Report. The Group will continue in assessing the impacts of its business on the major ESG aspects and to include in the ESG Report. Looking ahead, the Group will continue to improve the transparency of the environmental and social aspects of the Group by disclosing further comprehensive information and expanding the scope of the report whenever feasible.

Reporting Basis

The ESG Report is prepared in accordance with the ESG Reporting Guide (the "**ESG Guide**") set out in Appendix C2 of the Rules Governing the Listing of Securities (the "**Listing Rules**") on The Stock Exchange of Hong Kong Limited (the "**Stock Exchange**"). The Group has complied with the disclosure requirements of the "comply or explain" provisions set out in the ESG Guide. Certain key performance indicators ("**KPIs**") which are considered as material by the Group during the Reporting Period are disclosed in the ESG Report. The Group will continue to optimise and improve the disclosure of KPIs. The ESG Report is prepared and published in both English and Chinese. In the event of discrepancies or inconsistencies, the English version shall prevail.

Reporting Principles	Interpretation	The Group's Application
Materiality	The report should disclose significant impacts on the environment and society, or aspects that materially affect how the stakeholders assess the company and make decisions.	The Group conducts questionnaires and communicates with stakeholders and conducts the materiality assessment for identifying material ESG issues, and reports the Group's material sustainability issues.
Quantitative	The KPIs disclosed in the report shall be calculable and comparable where applicable.	Under feasible situation, the Group records, calculates and discloses quantitative information and conducts comparisons with past performance. KPIs in respect of historical data are to be measurable.
Balance	The issuer should objectively and truthfully report its current year ESG performance.	The Group follows the principles of accuracy, objectivity, and fairness to report its achievements and challenges in sustainable development.
Consistency	The ESG report should be prepared in a consistent manner, to allow meaningful comparison in ESG's KPIs and to facilitate understanding in corporate performance.	The Group ensures consistency in preparing the report and manage its ESG data for future comparison.

Stakeholders’ Engagement

The Group identifies the key stakeholders of its business operations. In daily business activities, the Group interacts with its stakeholders regularly through various communication channels as listed below:

Stakeholders	Concerns	Communication mechanisms
Employees	• Providing safe and suitable working environment for staff • Career development • Rights and interests of employees • Remuneration and welfare	• Email • Staff performance evaluation • Staff recreational activities • Staff training
Customers	• Product and service quality • Complying with applicable laws and being responsible for product and service liability • Respecting customer privacy and information security	• Customer service hotline • Email • Business negotiations • Contracts and agreements • Company website • Social media platforms
Investors and shareholders	• Corporate governance • Financial performance • Information disclosure • Protection of investors’ and shareholders’ interests • Improving operational efficiency to generate stable returns in the long run	• Email • Annual general meetings and other shareholder meetings • Company website • Reports, announcements and other publications
Suppliers and business partners	• Complying with applicable laws and eradicating corruption behaviour • Maintaining sound cooperation relationship or mutual growth • Formulating stringent procurement system and controlling risks	• Email • Business negotiations • Contracts and agreements • Company website • Social media platform
Community	• Community development support • Enhancing the environmental protection consciousness of staff and encouraging them to make commitment to the society • Developing innovative products to bring convenience to the society	• Email • Company website • Social media platforms

Materiality Assessment

With a growing population, challenges such as climate change, energy supply and security, raw material scarcity, human health and safety, and employment are to be addressed to ensure that people can lead healthy and fulfilling lives. Faced with a wide range of issues, the Group is keen to identify those that have a great impact on its stakeholders and business, and then to develop its strategic priorities.

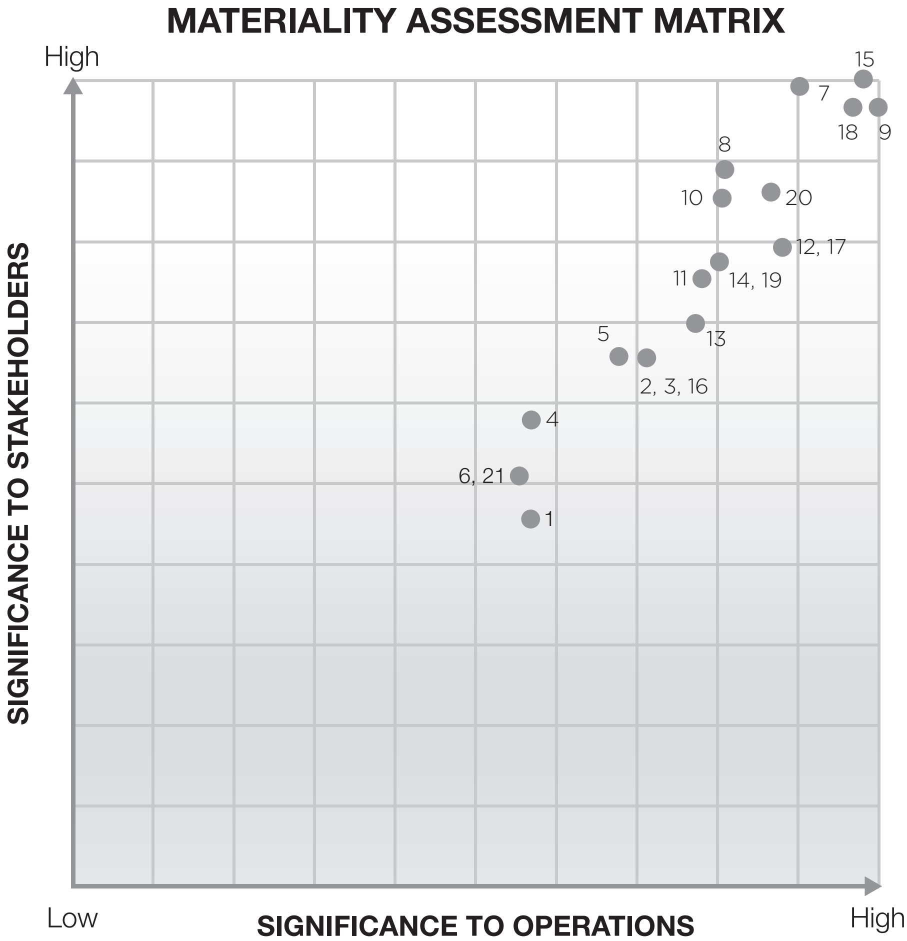
The Group adopted the principle of materiality in the ESG reporting by understanding the key ESG issues that are important to the business of the Group. In the Reporting Period, the Group undertook its annual materiality assessment exercise.

The objective of materiality assessment is to identify ESG topics that are material and relevant to the Group's operation. This involved distributing questionnaires to stakeholders to identify the most significant environmental and social impacts on its business. To identify potential material topics for disclosure in the ESG Report, the Group took reference to the ESG Guide and set possible topics for assessment.

In the context of the latest sustainability landscape, the Group has determined the following 21 material ESG topics that are deemed to have impact on the environment and society through its operations.

ESG Aspects				Material ESG Topics for the Group	
A.	Environmental Responsibility	A1.	Emissions	1.	Emission Management (Exhaust Gas and Greenhouse Gas)
				2.	Waste Management
		A2.	Use of Resources	3.	Energy Conservation
		A3.	The Environment and Natural Resources	4.	Water Management
				5.	Sewage Discharge
		A4.	Climate Change	6.	Climate Change Strategy
B.	Social Responsibility	B1.	Employment	7.	Employment
				8.	Diversity and Equal Opportunity
		B2.	Health and Safety	9.	Occupational Safety and Health
		B3.	Development and Training	10.	Trainings and Development
		B4.	Labor Standards	11.	Prevention of Child and Forced Labour
		B5.	Supply Chain Management	12.	Supply Chain Management
		B6.	Product Responsibility	13.	Customer Service Quality
				14.	Product/Service Quality and Safety
				15.	Personal Data Privacy Protection
				16.	Product Research and Development
				17.	Intellectual Property Rights Protection
				18.	Data Security
				19.	Operational Safety Management
		B7.	Anti-Corruption	20.	Anti-Corruption
		B8.	Community Investment	21.	Community Investment Engagement

Based on the analysis and summary of the results of the materiality assessment from all stakeholders, the Group has formed the following materiality assessment matrix, in which following substantial issues are disclosed in the materiality assessment matrix as the major influential aspects of the Group's sustainable development. Out of all environmental and social responsibilities, the Group priorities and will be paying more attention to these material aspects.



ESG topics of high level of materiality are shown as follows:

7. Employment
8. Diversity and Equal Opportunity
9. Occupational Safety and Health
10. Trainings and Development
12. Supply Chain Management
15. Personal Data Privacy Protection
17. Intellectual Property Rights Protection
18. Data Security
20. Anti-Corruption

The Group considers topics of high level of materiality are significant to its stakeholders, these topics will be discussed in details in this ESG Report.

Confirmation and Approval

The information presented in the ESG Report came from the official documents and statistical data of the Group. The ESG Report was approved by the Board on 27 June 2025.

Contact Information

The Group welcomes your feedback on the ESG Report for its sustainability initiatives. Please contact us by email to info@hkzcloud.com.

A. Environmental

Aspect A1: Emissions

To demonstrate the Group's commitment to sustainable development and compliance with laws and regulations relating to environmental protection, the Group endeavors to minimise the environmental impact of the business activities and maintain green operations and green office practices.

Majority of the Group's revenue derived from the provision of RMAA Services which include general upkeep, restoration and improvement of existing facilities and components of buildings and their surroundings. The work performed in site for RMAA Services is relatively small scale with not many machinery involved which generates limited and controllable emission and waste such as construction and demolition materials, dust, fumes, smokes, obnoxious gases and household wastes. The Group's revenue also comprised of a certain portion for providing building construction services that primarily consist of building works and civil works for new buildings such as lift tower, soccer field and walkways.

Generally, the Group delegates certain construction works to its subcontractors that are labour intensive or required specific skillset which in turn generate/consume more waste and materials that have material environmental impact to the surrounding, such as piling, demolition, waterproofing, painting, installation of doors, windows, floor tiles and playground equipment. Thus, given the nature of the Group's different type of services and subcontracting practice, it poses less negative impact to the environment than most typical construction industries.

The Group has been in strict compliance with the relevant laws and regulations in Hong Kong, including but not limited to the Air Pollution Control Ordinance (Chapter 311 of the Laws of Hong Kong), the Air Pollution Control (Construction Dust) Regulation (Chapter 311R of the Laws of Hong Kong), the Noise Control Ordinance (Chapter 400 of the Laws of Hong Kong), the Water Pollution Control Ordinance (Chapter 358 of the Laws of Hong Kong), the Waste Disposal Ordinance (Chapter 354 of the Laws of Hong Kong) and the Public Health and Municipal Services Ordinance (Chapter 132 of the Laws of Hong Kong). In view of the above local laws and regulation, the Group has adopted measures and work procedures that are in compliant with environment protection for its worker to follow. Such measures and procedures concerning mainly air pollution and noise control include, amongst other things:

(i) dust suppression by use of water;

(ii) use of low-dust techniques and equipment as required by customers;

(iii) inspection and maintenance of all equipment before use for compliance of permitted noise level; and

(iv) use of machinery that are environmentally friendly.

During the Reporting Period, the Group did not generate/consume any significant hazardous waste and non-hazardous waste due to its business nature. The Group engaged licensed collectors to transport the waste for disposal at designated locations. However, no data regarding the consumption of waste is collected because the Group is in the process of allocating sufficient manpower and resources in keep record of such details. In the future, the Group would continue to enhance the disclosure of such KPIs.

In addition, the Group advocates emission reduction, and is committed to achieving sustainable operations. To this end, the Group has set preliminary directional targets in terms of reducing emissions (including air pollutants, greenhouse gas, and hazardous and non-hazardous waste). The Group will review the progress and explore more ways to meet various environmental protection goals. In the future, the Group will set more specific quantitative environmental goals to nurture the environment and cherish natural resources.

Environmental aspects	Targets	Steps taken to achieve the targets
Air Pollutant Emissions	The Group will actively implement the air pollutant control plan and measures to maintain or reduce the intensity of air pollutant emissions.	• Carrying out regular maintenance of vehicles with good condition for operational efficiency • Encouraging the use of public transportation
Greenhouse Gas Emissions	The Group will actively implement the electricity-saving plan and measures to maintain or reduce the intensity of greenhouse gas emissions.	• Setting the temperature of air-conditioning system in a range between 25℃ to 26℃ • Switching off lights and unnecessary electrical devices when they are not in use • Promoting environmental protection such as saving water and electricity by slogan or poster in office
Waste Reduction	The Group will actively implement the material-saving plan and measures to maintain or reduce the intensity of waste production.	• Using electronic document to minimise the use of paper • Encouraging printing or photocopying on both sides of paper, where applicable • Focusing on quality management to reduce wastage and scrap for less pollution resulted

Major air pollutant emission from vehicles during the Reporting Period and the corresponding period from 1 April 2023 to 31 March 2024 (the "**Corresponding Period**") are as follows:

Type of air pollutants	**Air Pollutant Emission** **2025** **Air pollutant emission kilogram ("kg")**	2024 Air pollutant emission (kg)
Sulphur oxides	**0.76**	0.93
Nitrogen oxides	**21.65**	26.26
Particulate matter	**17.84**	21.74

Note:

(1) The Group's air pollutants are mainly from emissions from vehicle usage. The calculation of air pollutants emission for the Reporting Period is based on (but not limited to) *How to prepare an ESG Report — Appendix 2: Reporting Guidance on Environmental KPIs* issued by the Stock Exchange.

During the Reporting Period, the total greenhouse gas ("**GHG**") emission decreased by 20.1% as compared to the previous year. The GHG emission from the operation of the Group during the Reporting Period and the Corresponding Period are set out below:

Type of GHG emissions	**GHG Emission(1)(2)** **2025** **CO_2 equivalent emission (kg)**	2024 CO_2 equivalent emission (kg)
Scope 1 Direct emissions(3)	**122,926.82**	164,240.07
Scope 2 Indirect emissions(4)	**63,121.80**	68,688.36
Total	**186,048.62**	232,928.43
Intensity (kg/revenue HK$'000)	**0.15**	0.20

Notes:

(1) The Group's GHG inventory includes carbon dioxide ("**CO_2**"), methane and nitrous oxide, and the GHG emissions data is presented in carbon dioxide equivalent.

(2) The calculation of GHG data for the Reporting Period is based on (but not limited to) *The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard* issued by the World Resources Institute and World Business Council for Sustainable Development, *How to prepare an ESG Report – Appendix 2: Reporting Guidance on Environmental KPIs* issued by the Stock Exchange, "Global Warming Potential Values" from the Intergovernmental Panel on Climate Change ("**IPCC**") Sixth Assessment Report (AR6) in 2021, and carbon emission factor published by CLP Power Hong Kong Limited.

(3) Scope 1 Direct emissions were mainly from the use of Group-owned vehicles.

(4) Scope 2 Indirect emissions were mainly from the consumption of purchased electricity of the Group during operation.

The Group will continue to assess, record and disclose its GHG emissions and other environmental data annually, and evaluate the effectiveness of existing measures to further draw up carbon reduction targets and working plans.

During the Reporting Period, the Group has not encountered any incident of non-compliance with applicable laws and regulations in relation to the discharge of air emission, and the disposal and handling of hazardous and non-hazardous waste.

Aspect A2: Use of Resources

The Group attached great attention to the efficient use of resources. The major resources used by the Group are electricity, water and paper. The Group strives to improve the efficient use of natural resources, such as minimising waste/emissions and implementing effective recycling program. Practical measures implemented are as follows.

Electricity

The Group is committed to sustainable development by enhancing energy efficiency. Electricity saving measures are implemented. For instance, electrical appliances are required to be set as energy saving mode where possible. Office computers are set to enter idle mode for energy conservation when they have been left inactive for 20 minutes. Air conditioning temperature should be set in a range from 25˚C to 26˚C.

Also, power supply should be switched off when electrical appliances are not in use. Preference will be given to equipment with higher energy efficiency.

During the Reporting Period, the total energy consumption decreased by 15.0% as compared to the previous year. Energy consumption by the Group during the Reporting Period and the Corresponding Period are set out below:

	Energy Consumption	
Type of energy	**2025 Energy consumed kilowatt hour (“kWh”)**	2024 Energy consumed (kWh)
Unleaded petrol	**307,288.46**	331,709.54
Diesel	**166,995.89**	245,569.75
Purchased electricity	**166,110.00**	176,124.00
Total	**640,394.35**	753,403.29
Energy intensity (kWh/revenue HK$’000)	**0.50**	0.65

Notes:

(1) Total energy consumption comes from unleaded petrol, diesel and purchased electricity. The energy conversion coefficient is in accordance with *2006 IPCC Guidelines for National Greenhouse Gas Inventories – Volume 2* issued by IPCC and *Energy Statistics Manual – Appendix 3* issued by International Energy Agency.

(2) Diesel data is sourced from diesel consumption of the Group’s owned vehicles.

(3) Unleaded petrol data is sourced from unleaded petrol consumption of the Group’s owned vehicles.

Water

In terms of water use, the Group has not encountered any difficulties in finding suitable water sources. The wastewater generated mainly comes from domestic sewage. The Group is mindful of water resource utilisation and actively works to decrease water consumption within its operations. The impact of freshwater use is relatively insignificant for the Group. Water rate charges do not form a separate item in the rent or even in site, yet the Group encourages staff to reduce water wastage, for example, turn off the tap when it is unused.

Paper

Use of paper indirectly affects the overall GHG emission. The Group has been taking the following measures to control paper consumption:

- Encourage the use of paper by printing or photocopying on both sides of paper, where applicable.
- Encourage employees to use suitable font size/shrinkage mode to minimise pages, if possible. Besides, electronic media is recommended for circulation/communication to minimise use of paper.

During the Reporting Period, the paper consumption was approximately 850 kg (2024: 900 kg).

Packaging Material

During the Reporting Period and the Corresponding Period, the Group had not consumed significant packaging materials due to its business nature. Therefore, the relevant data is not recorded.

In addition, the Group advocates energy and resources saving, and is committed to achieving sustainable operations.

To this end, the Group has set preliminary directional targets in terms of energy use efficiency and water efficiency. The Group will review the progress and explore more opportunities for various environmental protection goals. In the future, the Group will set more specific quantitative environmental goals to conserve the environment and cherish natural resources.

Environmental aspects	Targets	Measures taken to achieve the targets
Energy Conservation	The Group will actively implement the electricity-saving plan and measures to maintain or reduce the intensity of energy consumption.	• Setting the temperature of air-conditioning system in a range between 25°C and 26°C. • Switching off lights and unnecessary electrical appliances when they are not in use. • promoting environmental protection such as saving energy by slogan or poster in office.
Water Conservation	The Group will actively implement the water-saving plan and measures to maintain or reduce the intensity of water consumption.	• Promoting environmental protection such as saving water by slogan or poster in office.

Aspect A3: The Environment and Natural Resources

The Group raises staff's awareness on environmental issues through education and training and enlists employees' support in improving the Group's performance, promotes environmental awareness amongst the customers, business partners and shareholders, supports community activities in relation to environmental protection and sustainability, performs evaluation regularly and monitors past and present business activities impacting on health, safety and environmental matters. With the integration of policies mentioned in sections "Emissions" and "Use of Resources", the Group strives to minimise the adverse impacts to the environment and natural resources.

Aspect A4: Climate Change

Climate change has caused frequent extreme weather and has an impact on the business operations of the Group.

Therefore, the Group has formulated working mechanisms to identify, prevent and mitigate climate change issues that may have a significant impact. At the same time, the Group would adjust the use of resources and energy. In response to disasters and accidents which are easily induced by extreme weather, the Group will strive to strengthen its capability and resilience to cope with extreme weather events.

Physical Risk

The Group has identified extreme weather such as typhoons, heavy rain, thunder and lightning and flooding that can cause physical risk. The potential consequences include material delivery delay, project suspension or delay, damage to documents, equipment and even employees' health and life. The above potential consequences will cause economic losses to and increase operating costs of the Group.

The Group has established the following measures to prevent and minimise the negative effect of extreme weather:

Physical Risk

Extreme weather	Preventative and mitigation measures
Typhoons	• Ensure all doors and windows are shut in advance • Move materials and equipment to safe locations in advance, or covered with a tarp • Secure the position of equipment and components that may be blown away • Stop outdoor or site works
Heavy rain and flooding	• Ensure all doors and windows are securely closed and locked • Clean up trash and provide pumping equipment at areas of flooding risk to make sure drains are unblocked • Secure the position of equipment and assets which may be damaged or blown away
Thunder and lightning	• Ensure earthing devices are in good condition • Remind employees to save data and turn off computers • Stop outdoor works

Transition Risks

In addition to the physical risks mentioned above, the Group is also exposed to restructuring risks arising from the requirements of the transition to a low-carbon economy. For example, the Stock Exchange has required listed companies to enhance disclosure of climate-related risks and opportunities in their ESG reports. The People's Republic of China has also made a solemn commitment to be "carbon neutral" by 2030 and "peak carbon" by 2060 and has promulgated relevant action plans and policies. If the Group fails to meet the policy requirements in terms of compliance, it may result in additional compliance costs and reputational risks, and lower its competitiveness in the market.

To mitigate policy and legal risks as well as reputational risks, the Group regularly monitors its internal climate disclosure-related activities to ensure that these activities are in compliance with the relevant requirements of the Stock Exchange and to minimise compliance costs.

B. Social

Aspect B1: Employment

The Group believes that a key to success is the ability to recruit, retain, motivate and develop talented and experienced staff members. The Group endeavours to attract and retain appropriate and qualified personnel to serve the Group.

The Group assesses its available human resources on a continuous basis and will determine whether additional personnel are required to cope with the business development of the Group.

The Group's employee handbook sets out its standards for compensation and dismissal, recruitment and promotion, working hours, rest periods, equal opportunity, diversity, anti-discrimination, and other benefits and welfare.

The highlights of the employee handbook are:

- remuneration and benefits are based on prevailing practices in local market and subject to adjustments based on experiences and qualifications;
- annual discretionary bonuses are determined with reference to the economy, annual results of the Group and annual performances, experiences and positions of employees;
- working hours for office and other employees are stated;
- resting period is provided in accordance with applicable laws;
- policies relating to equal opportunities are adopted which aim to eliminate discrimination on the ground of race, age, sex, marital status, religion, pregnancy and disability in workplace; and
- dismissal or voluntary termination of employee's contracts will be processed in accordance with the applicable labour laws.

As at 31 March 2025, the Group had a total of 398 employees (2024: 225), whom were all full-time employees based in Hong Kong. The following table shows the employee composition by gender, age group and employee category as at 31 March 2025 and 31 March 2024:

	As at 31 March 2025		As at 31 March 2024	
	Number of staff	**%**	Number of staff	%
By gender				
Male	**350**	**88**	203	90
Female	**48**	**12**	22	10
Total	**398**	**100**	225	100
By age group				
30 or below	**45**	**11**	12	6
31-40	**81**	**20**	45	20
41-50	**86**	**22**	46	20
51 or above	**186**	**47**	122	54
Total	**398**	**100**	225	100
By employee category				
Senior Management	**6**	**2**	7	3
Middle Management	**5**	**1**	—	—
General	**22**	**5**	25	11
Contract or short term	**365**	**92**	193	86
Total	**398**	**100**	225	100

The table below shows the overall turnover rate of employees all based in Hong Kong by gender and age group for the Reporting Period and the Corresponding Period.

	2025 Employee turnover rate (%)	2024 Employee turnover rate (%)
By gender		
Male	**39**	86
Female	**8**	64
Total	**35**	84
By age group		
30 or below	**29**	208
31-40	**38**	73
41-50	**33**	76
51 or above	**37**	78
Total	**35**	84

The Group entered into separate labour contracts with each of its employees in accordance with the applicable labour laws of Hong Kong. The Group provides competitive and attractive remuneration package to reward and retain the employees. The package includes basic salary, bonus, allowance and retirement benefits. The Group recruits employees from the open market through placing recruitment advertisement and referrals to satisfy its demand of different talents. The Group believes that the above arrangement can help maintain good relationship with its employees.

The Group strictly complies with the laws and regulations including but not limited to the Employees' Compensation Ordinance (Chapter 282 of the Laws of Hong Kong), the Employment Ordinance (Chapter 57 of the Laws of Hong Kong), the Construction Workers Registration Ordinance (Chapter 583 of the Laws of Hong Kong), the Minimum Wage Ordinance (Chapter 608 of the Laws of Hong Kong), the Mandatory Provident Fund Schemes Ordinance (Chapter 485 of the Laws of Hong Kong).

During the Reporting Period, there were no material non-compliance with the laws and regulations regarding employment, compensation and dismissal, recruitment and promotion, working hours, rest periods, equal opportunity, diversity, anti-discrimination, and other benefits and welfare.

Aspect B2: Health and Safety

The Group places emphasis on occupational health and work safety in providing RMAA Services and building construction services. This is evidenced by various awards received in past years such as Bronze Award Recognizing Excellence in safety for safe subcontractor award 2016 by Lighthouse Construction Industry Charity. In 2019, the Group received the Silver Prize/Outstanding Performance in Work-at-height Safety Prize under Construction Industry Safety Award Scheme 2018/2019 by Labour Department. The Group has adopted an occupational health and safety system as required by relevant occupational health and safety laws, rules and regulations. Since the inherent nature of works in construction sites often involves working at height and usage of mechanical equipment and machinery, construction workers are constantly subjected to risks of accidents or injuries, and the Group has the following policies and measures in place to mitigate such risks:

(i) All members of the Group's direct labour and subcontractors' labour are required to put on necessary safety equipment, including safety helmet that meet certain safety standard, for entering construction site;

(ii) The performance of all equipment, devices and tools should be checked for safety before use;

(iii) All subcontractors should report safety incidents to the Group;

(iv) The staff and the subcontractors' workers entering project sites are required to observe the occupational health and safety measures and the Group's policy. Subcontractors must ensure their workers work safely and care for others;

(v) The Group reserves the right to expel worker who violates the safety policy in construction site;

(vi) All workers are required to attend site safety briefing sessions and trainings before they commence work on-site. Topics of safety training typically cover safety procedures for performing different types of work; and

(vii) The Group is required to comply with the "Guidance Notes on Prevention of Heat Stroke at Work" issued by the Labour Department, such as providing cool drinking water and enhancing heat dissipation measures.

Besides, safety supervisors are responsible for regularly visiting and inspecting the performance of the works. Insurance are purchased to cover and protect employees of main contractors and subcontractors of all tiers working in the relevant construction site, as well as the works performed by them in the relevant construction site.

The Group has also put in place an internal policy setting out the procedures for recording, handling and reporting all work-related accidents and injuries to the Commissioner for Labour. The key procedures are as follows:

(i) Upon occurrence of a work-related accident, it shall be reported to the on-site foreman and/or project manager. Details of the injury, including the date, time, location, causes, identity of the injured person, shall be gathered by the on-site foreman and/or project manager and shall be properly recorded by the administrative staff.

(ii) The Group shall submit notification of the accident to the Commissioner for Labour by filling in the prescribed form in accordance with the Employees' Compensation Ordinance (Chapter 282 of the Laws of Hong Kong) within 14 days after the Group becomes aware of the accident and the injury, or, in case of a fatal accident, within seven days.

(iii) All correspondences with the Labour Department shall be provided to the relevant customer and/or the relevant insurer.

The laws and regulations which are relevant to the Group's business including but not limited to the Factories and Industrial Undertakings Ordinance (Chapter 59 of the Laws of Hong Kong) and the Occupational Safety and Health Ordinance (Chapter 509 of the Laws of Hong Kong).

An accident register was established by the Group to record the date, types and details of accident, the injured person, compensation paid and insurance claim details, and a safety violation register was kept to record the date, types and details of violated regulations, the involved workers and their subordinated contractors, as well as the amount of fine paid. Each register shall be reviewed monthly by the Executive Directors and the safety supervisors who will monitor subcontractors and workers' discipline and to ensure the relevant safety rules and regulations are being complied with.

During the Reporting Period, there were no material non-compliance in relation to the laws and regulations concerning health and safety issues.

Below is a detailed breakdown of the Group's work-related injuries and fatalities of the past three reporting years, including the Reporting Period:

	2025	2024	2023
Number of work-related fatalities:	**–**	–	–
• Rate of work-related fatalities	**–**	–	–
Number of work Injuries:	**–**	–	1
• Lost days due to work injury	**–**	–	36

Aspect B3: Development and Training

The Group recognises the importance of training for the development of its employees as well as the Group. The Group provides various types of trainings to its employees and sponsor its employees to attend training courses as mentioned in aspect "B2: Health and Safety" in this ESG Report. The Group believes it is a win-win approach for achieving both employee and corporate goals as a whole.

Below is a detailed breakdown of the percentage of employees received training by gender and employee category during the Reporting Period and Corresponding Period:

	2025		2024	
	Number of staff received training	**Percentage of staff received training in the category**	Number of staff received training	Percentage of staff received training in the category
By gender				
Male	**13**	**3.7**	4	2.0
Female	**3**	**6.3**	—	—
Total	**16**	**4.0**	4	1.8
By employee category				
Senior Management	**5**	**83.3**	2	28.6
Middle Management	**2**	**40.0**	—	—
General	**9**	**40.9**	2	8.0
Contract or short term	**—**	**—**	—	—
Total	**16**	**4.0**	4	1.8

Below is a detailed breakdown of training hours received by employees by gender and employee category during the Reporting Period and Corresponding Period:

	2025		2024	
	Total number of training hours	**Average Number of training hours**	Total number of training hours	Average Number of training hours
By gender				
Male	**102**	**0.3**	36.5	0.2
Female	**20**	**0.4**	—	—
Total	**122**	**0.3**	36.5	0.2
By employee category				
Senior Management	**73**	**12.2**	25	3.6
Middle Management	**2**	**0.4**	—	—
General	**47**	**2.1**	11.5	0.5
Contract or short term	**—**	**—**	—	—
Total	**122**	**0.3**	36.5	0.2

Aspect B4: Labour Standards

The Group is fully aware that child labour and forced labour violate fundamental human rights and also pose threat to sustainable social and economic development. The Group strictly complies with the Employment Ordinance (Chapter 57 of the Laws of Hong Kong) and other relevant labour laws and regulations in Hong Kong. The Group prohibits the use of child labour and forced labour.

Employment contracts and other records documenting all relevant details of the employees (including age) are maintained properly for verification by relevant statutory body upon request.

The Group strictly forbids the employment of any child labour and forced labour. In order to prevent the occurrence of child labor in the operation that does not conform to the employment regulations, only employees who have reached the legal employment age are allowed to work. New employees are required to provide true and accurate personal documents for identification at the time of employment. The Group would strictly check the personal information, including but not limited to Identity cards. The Group has developed a comprehensive recruitment process to check the background of candidates. Once violations are found, the Group will seriously follow up and deal with them in accordance with relevant local laws and regulations, for example, the Group will contact the guardian to escort the child home.

The Group and its employees signed labour contracts in accordance with relevant laws and regulations of Hong Kong which ensures that employees can resign within the terms of their employment contract so as to avoid forced labour.

During the Reporting Period, the Group has complied with policies and relevant laws and regulations regarding prevention of child labour or forced labour, and the Group did not identify any issues relating to child labour or forced labour that had a significant impact on the Group.

Aspect B5: Supply Chain Management

The Group works closely with its customers, suppliers and subcontractors who are committed to high quality, environmental, health and safety standards.

Suppliers of goods and services, which are specific to the Group's businesses and are required on a project-by-project basis to enable it to continue the business, mainly include (i) suppliers of materials required for performing construction service works such as steel, aluminium, wooden door and glass; and (ii) suppliers of other miscellaneous services such as the transportation of construction waste, the rental of machinery, testing and surveying of the quality of materials. The Group generally places orders with suppliers on a project-by-project basis and the Group does not enter into any long-term contract with the suppliers. The terms of the supply contracts mainly include the type of materials or services, price, quantity and payment terms. The Group selects suppliers mainly based on: (i) quality of materials; (ii) timeliness of delivery; (iii) previous experience with the supplier; and (iv) reputation of the supplier. The Group maintains a pre-approved list of suppliers from which it selects its suppliers.

The Group generally engaged subcontractors on a project-by-project basis and it does not enter into any long-term contract with its subcontractors. The works the Group subcontracted to subcontractors are generally labour intensive or it requires specific skillset, such as demolition, waterproofing, painting, installation of doors, windows, floor tiles and playground equipment. The Group maintains a list of approved subcontractors who have been assessed and approved by it, from which the Group selects its subcontractors. The assessment may include (i) evaluating of subcontractors' recent performance; (ii) reviewing third-party assessments or certification held by the subcontractor; (iii) assessing whether the subcontractor has sufficient resources and skills to fulfil the specific requirements; (iv) reviewing their requisite licenses and registrations; and (v) reviewing the quotation and/or subcontracting fee provided. The Group will from time-to-time review and update the internal list of approved subcontractors according to their performance assessment. During project implementation, the Group's project managers will meet with the engaged subcontractors and closely monitor their work progress and performance. The contracts entered into between the Group and the subcontractors provide that the subcontractors are required to observe all the requirements and provisions of the tender document.

In addition, the Group evaluates its subcontractors and suppliers taking into consideration of the environmental and social criteria including the prohibition on the recruitment of child and forced labour, eliminating discrimination to employees, providing a safe working environment, considering if the products and services provided are beneficial to environmental protection and fulfilling the Group's internal environmental requirement while minimising the negative impact to natural environment, and strictly obeying the law. The Group will from time-to-time review and update the internal list of approved subcontractors according to their performance assessment.

The Group is not aware of any significant environmental and social risks on the supply chain management.

During the Reporting Period, the Group had 1,164 suppliers mainly from Hong Kong and the Mainland China. The following table shows a detailed breakdown of the Group's suppliers by geographical region during the Reporting Period:

	2025	
	Number of suppliers	**% of total**
Hong Kong	**1,133**	**97.3%**
Mainland China	**31**	**2.7%**
Total	**1,164**	**100%**

Aspect B6: Product Responsibility

Compliance with relevant laws and regulations

The Group is not aware of any material non-compliance with relevant laws and regulations that have a significant impact on health and safety, advertising, labelling and privacy matters with regards to the products and services provided by the Group during the Reporting Period.

Quality control on projects

The Group is liable for the works carried out by it and its subcontractors. The Group ensures that each project is completed in accordance with the specifications set out for the project. The project officer is responsible for supervising the overall daily activities including those executed by subcontractor in accordance with the construction programme. In addition, the project manager will monitor the activities and project status and note for any issues arising from the execution of the project. The project manager will timely inform the project directors on the project status and matters of concerns.

The Group has an experienced and professional management who possesses extensive operational expertise and in-depth understanding of the RMAA Services and building construction services markets in Hong Kong, which allows it to be informed of market trends when formulating its market position and developing business strategies. The Group's project management teams have industry and technical knowledge in RMAA Services and building construction services, and the technical employees have the practical skills and experience. The project management staff also have relevant industry experience and possess relevant professional qualifications as required for the construction works. Some of the technical staff including quantity surveyors and foremen have been working with the Group for many years. The Group believes the project management experience and technical knowledge in RMAA Services and building construction services market would facilitate the efficient and timely implementation and management of projects.

The Group trusts that the combination of management's expertise and knowledge of the construction industry in Hong Kong, together with qualified and experienced project management and technical staff have been and will continue to be its most valuable assets, which will enable the Group to take up projects of various scale and building type and fulfil customers' requirements.

For quality control measure over subcontractors, please refer to aspect "B5: Supply Chain Management" in this ESG Report for further details.

During the Reporting Period, there were no disputes between the Group and its customers in respect of the quality of work performed by the Group or its subcontractors. The Group also did not recall any items due to safety and health reasons, as its business operation did not involve the sales of products during the Reporting Period.

Customer Services

The Group has established internal procedures for handling customer complaints. After collecting customers' opinions, they are classified according to their contents. The relevant departments will investigate and follow up based on the authenticity and characteristics of the content. Improvement and preventive measures are developed to continuously enhance the quality of products and services.

The Group did not receive any complaint or claim from the customers in relation to its services during the Reporting Period.

Data protection

The Group values the privacy of personal data. The Group strictly follows the Personal Data (Privacy) Ordinance (Chapter 486 of the Laws of Hong Kong) in operation and adopts it as the Group's Personal Data Privacy Policy.

Employees are generally required to execute a standard employment contract, which includes a clause acknowledging that all inventions, trade secrets, works of authorship, developments and other process generated by them on behalf of the Group are the Group's property, assigning to the Group any ownership rights that they may have in those works, and requiring them to not disclose or use the Group's confidential information except for benefit of the Group as the Group may authorise. The Group has established an internal management team to be responsible for monitoring the implementation of the aforementioned policy.

Intellectual properties

The Group owns one domain name in Hong Kong. The Group requires its employees to keep trade secrets and other proprietary intellectual property rights of the Group confidential. The Group is not involved in any proceedings with regard to, and the Group has not received any notice of claims of, infringement of any intellectual property rights that may be threatened or pending in which the Group may be involved either as a claimant or respondent. The Group has established an internal management team to be responsible for monitoring the implementation of the aforementioned policy.

Aspect B7: Anti-Corruption

To ensure operation efficiency and employees' development in a fair and honest working environment, the Group has formulated the whistleblowing policy and established guideline in employee handbook and internal policy to promote business ethics and integrity so as to avoid suspected corruption, extortion and money laundering. Reporting channels include reporting in person or writing either by email or by post. If there are any suspected cases related to corruption, employees are encouraged to report the related cases through the aforementioned channels. The Group has established an internal management team to be responsible for monitoring the implementation of the aforementioned procedures. All these practical actions not only win the trust of customers, but also enhance the sense of belonging and fair play among employees. During the Reporting Period, the Group had provided anti-corruption training materials to the newly appointed directors. However, the Group had not provided any anti-corruption training for staff because the Group was in the process of determining and arranging appropriate resources in promoting such topics within the Group. Yet, looking ahead, the Group will invest more resources to anti-corruption training and expand the scope of anti-corruption training data disclosure.

The Group has been in strict compliance with laws and regulations related to anti-corruption and prevention of bribery, extortion, fraud and money laundering, including but not limited to the Anti-Money Laundering and Counter-Terrorist Financing Ordinance (Chapter 615 of the Laws of Hong Kong) and the Prevention of Bribery Ordinance (Chapter 201 of the Laws of Hong Kong). During the Reporting Period, there was no legal case regarding corrupt practices, extortion and money laundering brought against the Group or its employees.

Aspect B8: Community Investment

The Group adheres to the belief that it should assume the responsibility of contributing to society while developing its business. As a socially responsible company, the Group is committed to understanding the needs of the communities in which it operates. The Group strives to develop long-term relationship with its stakeholders and make contributions to programmes that have a positive impact on community development.

The Group has long been concerned about the health care issue of the community. The Group donated approximately HK$28,000 to Shui On Seagull Club during the Reporting Period. Shui On Seagull Club was set up in 1982. It plays an active role in promoting voluntary social services among staff. It works hand-in-hand with charitable organisations in both Hong Kong and Mainland China to ensure donations of time and money make a direct positive impact on the lives of the most deserving. Looking ahead, the Group will continue to shoulder social responsibilities and strive to serve the community.

References to the ESG Guide

Subject areas, aspects, general disclosures and KPIs		Chapter/Disclosure	Page
Aspect A1: Emissions			
General Disclosure	Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to air emissions, discharges into water and land, and generation of hazardous and non-hazardous waste.	Emissions	7-8
KPI A1.1	The types of emissions and respective emissions data.	Emissions	9
KPI A1.2	Direct (Scope 1) and energy indirect (Scope 2) greenhouse gas emissions (in tonnes) and, where appropriate, intensity (e.g. per unit of production volume, per facility).	Emissions	9
KPI A1.3	Total hazardous waste produced (in tonnes) and, where appropriate, intensity (e.g. per unit of production volume, per facility).	Emissions	9
KPI A1.4	Total non-hazardous waste produced (in tonnes) and, where appropriate, intensity (e.g. per unit of production volume, per facility).	Emissions	9
KPI A1.5	Description of emissions target(s) set and steps taken to achieve them.	Emissions	8
KPI A1.6	Description of how hazardous and non-hazardous wastes are handled, and a description of reduction target(s) set and steps taken to achieve them.	Emissions	8

Subject areas, aspects, general disclosures and KPIs		Chapter/Disclosure	Page
Aspect A2: Use of Resources			
General Disclosure	Policies on the efficient use of resources, including energy, water and other raw materials.	Use of Resources	10-11
KPI A2.1	Direct and/or indirect energy consumption by type (e.g. electricity, gas or oil) in total (kWh in '000s) and intensity (e.g. per unit of production volume, per facility).	Use of Resources	10
KPI A2.2	Water consumption in total and intensity (e.g. per unit of production volume, per facility).	Use of Resources	10
KPI A2.3	Description of energy use efficiency target(s) set and steps taken to achieve them.	Use of Resources	11
KPI A2.4	Description of whether there is any issue in sourcing water that is fit for purpose, water efficiency target(s) set and steps taken to achieve them.	Use of Resources	11
KPI A2.5	Total packaging material used for finished products (in tonnes) and, if applicable, with reference to per unit produced.	Use of Resources	11
Aspect A3: The Environment and Natural Resources			
General Disclosure	Policies on minimising the issuer's significant impact on the environment and natural resources.	Emissions, Use of Resources and The Environment and Natural Resources	7-11
KPI A3.1	Description of the significant impacts of activities on the environment and natural resources and the actions taken to manage them.	Emissions, Use of Resources and The Environment and Natural Resources	7-11
Aspect A4: Climate Change			
General Disclosure	Policies on identification and mitigation of significant climate-related issues which have impacted, and those which may impact, the issuer.	Climate Change	12
KPI A4.1	Description of the significant climate-related issues which have impacted, and those which may impact, the issuer, and the actions taken to manage them.	Climate Change	12

Subject areas, aspects, general disclosures and KPIs		Chapter/Disclosure	Page
Aspect B1: Employment			
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 compensation and dismissal, recruitment and promotion, working hours, rest periods, equal opportunity, diversity, antidiscrimination, and other benefits and welfare.	Employment	13-15
KPI B1.1	Total workforce by gender, employment type (for example, full- or part-time), age group and geographical region.	Employment	14
KPI B1.2	Employee turnover rate by gender, age group and geographical region.	Employment	15
Aspect B2: Health and Safety			
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.	Health and Safety	16-17
KPI B2.1	Number and rate of work-related fatalities occurred in each of the past three years including the reporting year.	Health and Safety	17
KPI B2.2	Lost days due to work injuries.	Health and Safety	17
KPI B2.3	Description of occupational health and safety measures adopted, how they are implemented and monitored.	Health and Safety	16-17
Aspect B3: Development and Training			
General Disclosure	Policies on improving employees' knowledge and skills for discharging duties at work. Description of training activities.	Development and Training	17
KPI B3.1	The percentage of employees trained by gender and employee category (e.g. senior management, middle management).	Development and Training	18
KPI B3.2	The average training hours completed per employee by gender and employee category.	Development and Training	18

Subject areas, aspects, general disclosures and KPIs		Chapter/Disclosure	Page
Aspect B4: Labour Standards			
General Disclosure	Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to preventing child and forced labour.	Labour Standards	19
KPI B4.1	Description of measures to review employment practices to avoid child and forced labour.	Labour Standards	19
KPI B4.2	Description of steps taken to eliminate such practices when discovered.	Labour Standards	19
Aspect B5: Supply Chain Management			
General Disclosure	Policies on managing environmental and social risks of the supply chain.	Supply Chain Management	19-20
KPI B5.1	Number of suppliers by geographical region.	Supply Chain Management	20
KPI B5.2	Description of practices relating to engaging suppliers, number of suppliers where the practices are being implemented, and how they are implemented and monitored.	Supply Chain Management	19-20
KPI B5.3	Description of practices used to identify environmental and social risks along the supply chain, and how they are implemented and monitored.	Supply Chain Management	20
KPI B5.4	Description of practices used to promote environmentally preferable products and services when selecting suppliers, and how they are implemented and monitored.	Supply Chain Management	20

Subject areas, aspects, general disclosures and KPIs		Chapter/Disclosure	Page
Aspect B6: Product Responsibility			
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, labelling and privacy matters relating to products and services provided and methods of redress.	Product Responsibility	20-22
KPI B6.1	Percentage of total products sold or shipped subject to recalls for safety and health reasons.	Product Responsibility	21
KPI B6.2	Number of products and service related complaints received and how they are dealt with.	Product Responsibility	21
KPI B6.3	Description of practices relating to observing and protecting intellectual property rights.	Product Responsibility	22
KPI B6.4	Description of quality assurance process and recall procedures.	Product Responsibility	21
KPI B6.5	Description of consumer data protection and privacy policies, and how they are implemented and monitored.	Product Responsibility	21-22
Aspect B7: Anti-corruption			
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.	Anti-Corruption	22
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.	Anti-Corruption	22
KPI B7.2	Description of preventive measures and whistleblowing procedures, how they are implemented and monitored.	Anti-Corruption	22
KPI B7.3	Description of anti-corruption training provided to directors and staff.	Anti-Corruption	22

Subject areas, aspects, general disclosures and KPIs		Chapter/Disclosure	Page
Aspect B8: Community Investment			
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.	Community Investment	22
KPI B8.1	Focus areas of contribution (e.g. education, environmental concerns, labour needs, health, culture, sport).	Community Investment	22
KPI B8.2	Resources contributed (e.g. money or time) to the focus area.	Community Investment	22