

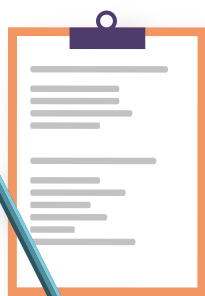
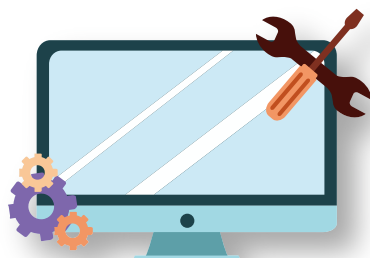
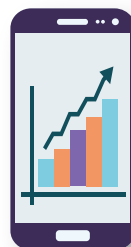
FINSOFT FINANCIAL INVESTMENT HOLDINGS LIMITED

匯財金融投資控股有限公司

(Incorporated in the Cayman Islands with limited liability)

(於開曼群島註冊成立的有限公司)

Stock Code 股份代號:8018



Environmental, Social
and Governance Report
環境、社會及管治報告

2019

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ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

環境、社會及管治報告

ABOUT THIS REPORT

Finsoft Financial Investment Holdings Limited (“Company”, together with its subsidiaries, “Group”) is delighted to present the Environmental, Social and Governance (“ESG”) Report (“ESG Report”) for the year ended 31 December 2019 (“Year”). The ESG Report provides an overview of the Group’s management on significant issues affecting its operations and analytical results to evaluate the Group’s performance in environmental and social aspects. It offers an opportunity for the stakeholders of the Group to understand the Group’s progress and development directions during the Year.

REPORTING STANDARD

The ESG Report was prepared in accordance with the Environmental, Social and Governance Reporting Guide as provided in Appendix 20 to the Rules Governing the Listing of Securities on GEM of The Stock Exchange of Hong Kong Limited (“GEM Listing Rules”). Corporate governance is addressed separately in the section headed “Corporate Governance Report” in the annual report of the Company for the Year (“2019 Annual Report”). The information presented in this ESG Report is prepared based on the principles of materiality, quantitative, balance and consistency.

SCOPE OF THE ESG REPORT

The information stated in this ESG Report covers the period from 1 January 2019 to 31 December 2019, which aligns with the financial year of the 2019 Annual Report. This ESG Report focuses on the core business segments of the Group, which are the provision of financial trading software solutions, provision of other IT and internet financial platform services, money lending business and assets investments.

FEEDBACK

The Group welcomes your feedback and comments to this ESG Report. Your feedback will help the Group to evaluate its sustainability performance and improve its ESG performance in future. Should you have any comments or suggestions, please feel free to contact the Group at:

Unit Nos. 1209–10, 12/F.
Prosperity Millennia Plaza
No. 663 King’s Road
North Point, Hong Kong

關於本報告

匯財金融投資控股有限公司（「本公司」，連同其附屬公司統稱「本集團」）欣然提呈截至二零一九年十二月三十一日止年度（「本年度」／「年」）的環境、社會及管治（「環境、社會及管治」）報告（「環境、社會及管治報告」）。環境、社會及管治報告提供本集團管理層認為影響本集團營運的重大事項總覽及分析結果，以供評估本集團在環境及社會方面的表現，使本集團持份者有機會了解本集團於年內的進展及發展方向。

報告準則

環境、社會及管治報告根據香港聯合交易所有限公司GEM證券上市規則（「GEM上市規則」）附錄20所載環境、社會及管治報告指引編製。企業管治事項則於本公司本年度年報（「二零一九年報」）「企業管治報告」一節另行載述。本環境、社會及管治報告所載資料乃根據重要性、量化、平衡及一致性原則編製。

環境、社會及管治報告範圍

本環境、社會及管治報告所載資料涵蓋二零一九年一月一日至二零一九年十二月三十一日期間，與二零一九年報的財政年度一致。本環境、社會及管治報告集中於本集團的核心業務分部，包括提供金融交易軟件解決方案、提供其他資訊科技及互聯網金融平台服務、借貸業務及資產投資。

反饋

本集團歡迎閣下對本環境、社會及管治報告給予反饋及意見。閣下的反饋有助本集團評估其可持續發展表現及改善日後的環境、社會及管治表現。請通過以下聯絡方式，提供閣下的寶貴意見或建議：

香港北角
英皇道663號
泓富產業千禧廣場
12樓1209–10室

APPROACH TO SUSTAINABLE DEVELOPMENT

With an increasing awareness of environmental protection among the general public, the Group acknowledges the importance in balancing between economic development and preservation of the environment.

The Group has been integrating ESG considerations into its operations. The Group is devoted to transforming itself into an environmentally-friendly corporation and has carried out its responsibilities to promote sustainable business growth while creating positive contribution to the environment and the community.

STAKEHOLDER ENGAGEMENT

The Group maintains an open and honest relationship with its stakeholders and constantly communicates with them, which enables the Group to consider how its business decisions impact its stakeholders. The table below presents the stakeholders' expectations and the Group's communication methods with them.

Stakeholders 持份者	Needs and expectations 需求及期望	Communication methods 溝通方式
Customers 客戶	<ul style="list-style-type: none"> Service quality Technological innovation Information security 服務質素 技術創新 信息安全 	<ul style="list-style-type: none"> Meetings E-mails and service hotline 會議 電郵及服務熱線
Employees 僱員	<ul style="list-style-type: none"> Rights and interests of employees Career development Remuneration and welfare 僱員的權利及權益 職業發展 薪酬與福利 	<ul style="list-style-type: none"> Training, seminars and briefing sessions Internal meetings Staff activities Performance review 培訓、研討會及簡報會 內部會議 員工活動 表現考核
Suppliers 供應商	<ul style="list-style-type: none"> Corporate reputation Customer satisfaction Communication and cooperation 公司聲譽 客戶滿意度 溝通與合作 	<ul style="list-style-type: none"> Meetings E-mails 會議 電郵

可持續發展方針

隨著社會大眾對環保意識有所增強，本集團深明平衡經濟發展與環境保護的重要性。

本集團一直將環境、社會及管治考慮融入業務之中。本集團致力轉型為環保企業，並一直履行促進可持續的業務增長，同時對環境及社會作出積極貢獻的責任。

持份者參與

本集團與持份者建立開放及坦誠的關係，並保持溝通，使本集團顧及其業務決策對持份者帶來的影響。下表呈列持份者的期望及本集團與各持份者的溝通方式。

ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

環境、社會及管治報告

Stakeholders 持份者	Needs and expectations 需求及期望	Communication methods 溝通方式
Shareholders and investors 股東及投資者	<ul style="list-style-type: none"> Information disclosure Corporate governance Financial performance Protection of investors' interests 信息披露 企業管治 財務表現 保障投資者權益 	<ul style="list-style-type: none"> Annual general meeting and other general meetings Announcements and publications 股東週年大會及其他股東大會 公告及刊物
Government and regulatory bodies 政府及監管機構	<ul style="list-style-type: none"> Relevant laws and regulations Economic development 相關法律法規 經濟發展 	<ul style="list-style-type: none"> Ad-hoc enquiries Seminars E-mails 不定時的查詢 研討會 電郵
Community 社區	<ul style="list-style-type: none"> Environmental responsibilities Public welfare Community development support 環境責任 公共福利 支持社區發展 	<ul style="list-style-type: none"> Community services and activities Mailbox Company website 社區服務及活動 郵箱 公司網站

MATERIALITY ASSESSMENT

In order to identify material sustainability issues, a survey has been conducted with the Group's stakeholders, who were asked to share their feedback and expectations about the Group's sustainability performance, and rank the relative importance of twenty-one identified topics.

重要性評估

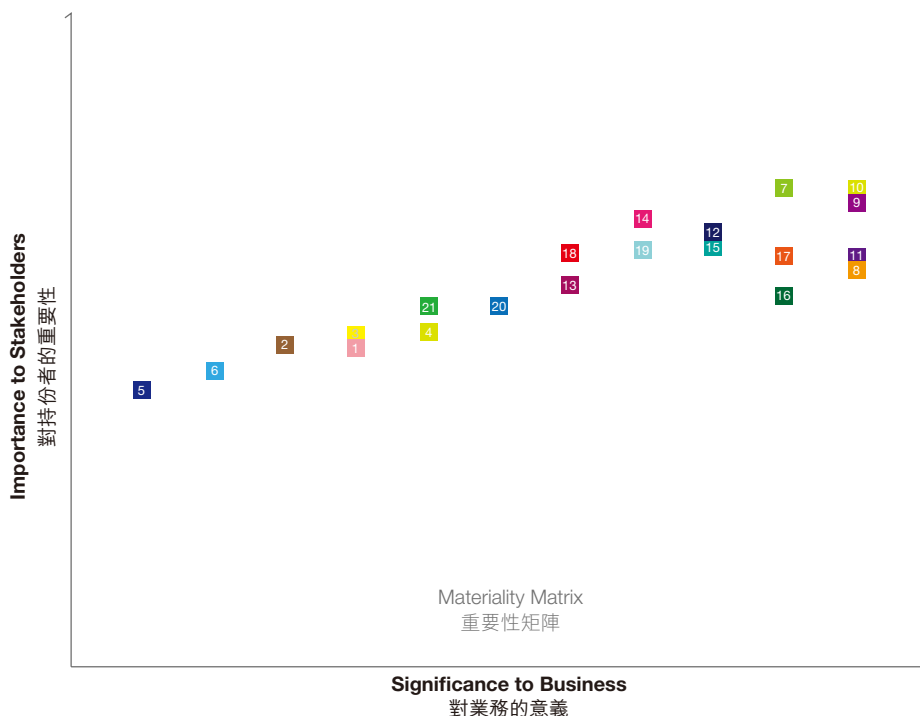
為確定重要的可持續發展議題，本集團邀請其持份者參與調查，分享有關對本集團可持續發展表現的意見及期望，並就21個已確定主題的相對重要程度評級。

ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

環境、社會及管治報告

After conducting the survey, the following matrix has been developed to identify and prioritise the Group's material topics. The Group's management approach and performance for these topics are discussed in details in this ESG Report. This materiality assessment allows the Group to meet the expectations of its stakeholders and improve the quality of this ESG Report. Based on the survey results, eleven material ESG topics were identified and highlighted in the following table:

進行調查後，本集團得出以下矩陣，以確定本集團的重要主題並對其優先排序。有關該等主題的本集團管理方針及表現於本環境、社會及管治報告詳述。本重要性評估有助本集團滿足其持份者期望，提升本環境、社會及管治報告的質素。根據調查結果，本集團確定11個重要的環境、社會及管治主題，並於下表中重點顯示：



Topics	主題
1. Greenhouse gas emission	1. 溫室氣體排放
2. Non-hazardous waste generation	2. 無害廢棄物產生
3. Waste recycling	3. 廢物回收
4. Energy use and energy efficiency	4. 能源使用及能源效率
5. Wastewater discharge	5. 廢水排放
6. Natural resources	6. 天然資源
7. Labour rights	7. 勞工權益
8. Diversity and equal opportunity	8. 多元化及平等機會
9. Employer-employee relations	9. 僱主 - 僱員關係
10. Employee benefits	10. 僱員福利
11. Training and development	11. 培訓及發展
12. Occupational health and safety	12. 職業健康及安全
13. Supply chain management	13. 供應鏈管理
14. Product/service quality and safety	14. 產品／服務質素及安全
15. Customer satisfaction	15. 客戶滿意度
16. Complaints handling	16. 投訴處理
17. Intellectual property rights	17. 知識產權
18. Consumer data protection and privacy	18. 消費者資料保護及私隱
19. Anti-corruption	19. 反貪污
20. Charitable donation	20. 慈善捐贈
21. Participation in voluntary work	21. 參與義工工作

ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

環境、社會及管治報告

EMPLOYMENT AND LABOUR PRACTICES

Employees are the engine of value creation for the Group's business. This drives the Group to create an engaging, harmonious, fair and safe working environment to support the professional and personal development of its employees.

During the Year, the Group was not aware of any material non-compliance with the Employment Ordinance (Cap. 57 of the Laws of Hong Kong), the Minimum Wage Ordinance (Cap. 608 of the Laws of Hong Kong), the Mandatory Provident Fund Schemes Ordinance (Cap. 485 of the Laws of Hong Kong) and other applicable local laws for employment.

As at 31 December 2019, the Group had 68 (2018: 62) employees consisting of 46 (2018: 43) male employees and 22 (2018: 19) female employees. All of them were full-time employees based in Hong Kong.

The total workforce of the Group by age is illustrated as follows:

Workforce by age group	按年齡組別劃分的員工	2019 二零一九年	2018 二零一八年
20 – 29	20 – 29 歲	41%	55%
30 – 39	30 – 39 歲	35%	31%
40 – 49	40 – 49 歲	18%	11%
50 or above	50 歲或以上	6%	3%

Recruitment and Benefits

Fair and equal employment and recruitment procedures are adopted within the Group. The recruitment process for all job vacancies involves reviewing job applications, selecting candidates for interviews, interviewing candidates and obtaining approval before giving any job offers. Recruitment is based on business needs and candidates' experiences and abilities, regardless of their gender, marital status, pregnancy, disability, age, family status, race, sexual orientation, religion and nationality. Any forms of discrimination are also prohibited. A successful applicant is required to sign an employment contract with the Group before the commencement of service. All rights and benefits of an employee, including working hours and leave entitlement, are clearly stated in the employment contract with the Group and employees are welcome to inquire about the details of their contracts if they have any uncertainties.

The Group offers competitive remuneration packages to its employees based on the prevailing market practices and their individual performances. These packages strictly comply with the Minimum Wage Ordinance (Cap. 608 of the Laws of Hong Kong). Employees are entitled to Mandatory Provident Fund ("MPF") contributions under the MPF scheme of the Group. Apart from basic salary, discretionary bonuses would be granted to employees subject to their individual performance as well as the business performance of the Group. The Group also provides medical insurance coverage to its employees. Under the share option scheme of the Company, share options may be granted to eligible employees.

僱傭及勞工慣例

僱員是本集團業務價值創造的原動力。這驅使本集團創造愉快、和諧、公平及安全的工作環境，以支持其僱員的專業及個人發展。

於年內，本集團並無知悉任何嚴重違反僱傭條例（香港法例第57章）、最低工資條例（香港法例第608章）及強制性公積金計劃（香港法例第485章）以及其他適用的地方僱傭法例。

於二零一九年十二月三十一日，本集團有68名（二零一八年：62名）僱員，包括46名（二零一八年：43名）男性僱員及22名（二零一八年：19名）女性僱員。所有僱員均為香港全職僱員。

本集團按年齡劃分的員工總數闡述如下：

招聘及福利

本集團採用公平及平等的僱傭及招聘程序。所有職位空缺的招聘過程包括檢視職位申請、遴選面試人選、與應徵者面談及在提供任何工作機會前先得取得批准。招聘乃以業務需要及應徵者的經驗及能力為基準，而不論性別、婚姻狀況、懷孕、殘疾、年齡、家庭狀況、種族、性取向、宗教及國籍。亦禁止任何形式的歧視。成功獲聘的求職者於入職前須與本集團簽訂僱傭合約。僱員的所有權利及福利（包括工作時間及享有的假期）於與本集團訂立的僱傭合約清晰訂明，僱員如有任何不清晰之處，歡迎僱員就其合約細節作出查詢。

本集團根據當前市場慣例及僱員個別表現向僱員提供具吸引力的薪酬待遇。該等待遇嚴格遵守最低工資條例（香港法例第608章）。根據本集團的強制性公積金（「強積金」）計劃，僱員有權享有強積金供款。除基本工資外，僱員亦因應個人表現及本集團業務表現獲發酌情花紅。本集團亦為其僱員投購醫療保險。根據本公司購股權計劃，購股權可授予合資格僱員。

ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

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In addition, the Group provides its employees with good promotion prospects. The Group has established an annual performance appraisal system to review staff performance and remuneration regularly, with an aim to reward and motivate its employees and assist them in their career development and promotion within the Group.

Dismissal

When there is a dismissal, sufficient notice period would be given in accordance with the relevant employment contract. Exit interviews would be conducted by human resources personnel of the Group with the individual employee to understand the reasons of leaving. Human resources personnel are responsible to ensure that the dismissal procedures are conducted in accordance with the relevant employment laws and regulations.

Work-life Balance

The Group is committed to be a family-friendly employer and therefore has adopted several family-oriented employment practices to enhance its employees' sense of belonging and help them achieve work-life balance. For instance, a five-day work week is in practice within the Group. Apart from statutory holidays, special leaves such as maternity leave, paternity leave and compassionate leave are offered to the employees. In addition, recreational activities such as annual dinner, sports activities and a neon party were also arranged during the Year to motivate the employees, increase their sense of belonging and promote an energetic corporate culture within the Group.

Training and Development

As trainings play a fundamental role in business growth, the Group encourages continuous development of its employees and improves their skill sets through trainings. The Group understands that training is the most sustainable way for long term development and is beneficial for both the Group and its employees. During the Year, the Group provided various internal and external trainings to strengthen the skills and knowledge of its employees. Training topics covered by the Group during the Year included information technologies, operation management, technical updates and market trends, GEM Listing Rules, accounting standards, law and compliance. As the Group also encourages its employees to identify their own personal objectives for development, their training costs for external courses can be reimbursed by the Group subject to management approval.

The following table illustrates a breakdown of the training hours completed by the Group's employees:

Average training hours completed (hours per employee)	已完成的平均培訓時間 (小時/每名僱員)	2019 (hour) 二零一九年 (小時)	2018 (hour) 二零一八年 (小時)
Male	男性	10.07	0.84
Female	女性	13.22	6.09
All employees	全體僱員	11.07	2.29

此外，本集團為其僱員提供良好的晉升機會。本集團已設立年度表現考核制度，以定期檢討員工表現及薪酬，旨在獎勵及激勵其僱員，並協助彼等於本集團內實現職業發展及晉升。

解僱

倘出現解僱情況，本集團會根據相關僱傭合約給予足夠通知期。本集團人力資源人員與個別僱員進行離職面談，以了解離職理由。人力資源人員負責確保解僱程序按相關僱傭法律法規進行。

工作與生活平衡

本集團致力成為家庭友善僱主，因此已採取若干關顧家庭的僱傭慣例，以提高其僱員的歸屬感，協助彼等達致工作與生活平衡。例如，本集團實行五天工作制。除法定假期外，本集團亦向僱員提供產假、陪產假及恩恤假等特別假期。此外，於年內舉辦週年晚會、體育活動及螢光派對等聯歡活動，以激勵僱員及提高彼等的歸屬感，並在本集團內部推動活力的企業文化。

培訓及發展

由於培訓在業務增長中起着重要的作用，本集團鼓勵僱員持續發展，並透過培訓提升技能。本集團深明培訓是長期發展最可持續的方式，且有益於本集團及其僱員。於年內，本集團為僱員提供各項內部及外部培訓，藉此提升技能及增進知識。本集團於年內涵蓋的培訓主題包括資訊科技、經營管理、技術更新及市場趨勢、GEM上市規則、會計準則、法律及合規等。由於本集團亦鼓勵僱員發掘個人發展目標，彼等參與外部課程的培訓費用可向本集團報銷，惟須經管理層審批。

下表載述本集團僱員已完成的培訓時間明細：

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Health and Safety

As the Group believes that employees' health is a big concern and can affect the Company's operation, it endeavours to maintain a healthy working environment for its employees. The following measures have been implemented by the Group to protect the health and safety of all employees:

- Continuously maintain and provide a safe working environment which poses no threat to health;
- Maintain and check first-aids kits regularly to ensure necessary items are in place;
- Strictly prohibit smoking at all enclosed areas within its offices;
- Perform regular checking and maintenance of machines, equipment and fire extinguishers;
- Attend annual fire drills organised by respective building management companies to help employees, especially new joiners, get familiar with the escaping routes in case of fire; and
- Carry out regular inspection at the workplace to identify any unsafe working conditions and correct any potential hazards once they are identified.

The Group was not aware of any material non-compliance with the Occupational Safety and Health Ordinance (Cap. 509 of the Laws of Hong Kong) and relevant laws and regulations that had caused any significant impact on the Group in relation to providing a safe working environment and protecting employees from occupational hazards for the Year.

During the Year, the Group did not have any lost days due to work injury (2018: 1 day) and there were no work-related fatalities (2018: Nil).

Labour Standard

The Group forbids any recruitment of children and/or the use of forced labour. During the Year, no incident about child and forced labour was identified and the Group complied with the Employment Ordinance and other relevant laws and regulations relating to preventing child and forced labour. Nevertheless, if there is any misuse of child labour or forced labour, the relevant employee will be dismissed immediately and the Group's human resources personnel will also conduct investigation to avoid reoccurrence.

The human resources personnel of the Group ensure all the employees are legally allowed to work and avoid employing child labour by checking the valid identifications of all the employees. The Group has also been continuously monitoring the relevant regulations regarding minimum wage to ensure that no employees are underpaid illegally. The Group forbids any abuse in the workplace so as to maintain a harmonious working environment. The suppliers of the Group are also expected to follow similar standards of labour practices when collaborating with the Group.

健康與安全

由於本集團認為僱員的健康是一大關注，且可影響本公司營運，因此致力於為其僱員營造健康工作環境。本集團已推行以下措施，以保障全體僱員的健康與安全：

- 持續維持並提供安全且無健康威脅的工作環境；
- 放置並定期檢查急救箱，確保存放必要用品；
- 嚴禁在辦公室內所有封閉區域吸煙；
- 定期檢查並保養機器、設備及滅火器；
- 參加相關大廈管理公司舉辦的年度消防演習，一旦發生火災，僱員（尤其是新員工）亦能熟習逃生路線；及
- 定期检查工作場所發現任何不安全的工作狀況，一經發現潛在危害即加以糾正。

於年內，本集團並無知悉任何嚴重違反職業安全及健康條例（香港法例第509章）及相關法律法規而對本集團就提供安全工作環境及保障僱員免受職業危害的情況造成任何嚴重影響。

於年內，本集團並無任何因工傷而損失的工作天數（二零一八年：1天），且並無發生任何工作致命事故（二零一八年：無）。

勞工準則

本集團禁止任何招聘童工及／或僱用強制勞工。於年內，並無發生有關童工及強制勞工的事件，且本集團遵守僱傭條例及其他有關防止僱用童工及強制勞工的相關法律及法規。然而，倘發現任何誤聘童工及強制勞工，有關僱員將會被立即解僱，而本集團人力資源人員亦會進行調查以防事件再次發生。

本集團人力資源人員透過查核全體僱員的有效身份證明，以確保全體僱員可合法工作及防止僱用童工。本集團亦一直不斷監察有關最低工資的相關規例，以確保並無僱員被違法少付工資。本集團禁止任何職場欺凌，從而維持和諧的工作環境。此外，本集團期望其供應商在與本集團合作時遵守相似的勞工準則。

OPERATING PRACTICES

Supply Chain Management

The Group attaches great importance to supplier selection, management and monitoring. The Group expects its suppliers to protect the environment, cherish resources, comply with all laws and regulations and treat employees fairly as the Group does.

The Group adheres to the principles of openness, fairness and transparency in supplier selection. The Group's suppliers mainly comprise (i) hardware vendors who supply hardware, which are mainly servers, for the Group's sale of hardware; and (ii) data centre operators and network system providers who lease out rack space in data centres and network systems respectively for the Group's hosting services.

When selecting suppliers, the Group evaluates its suppliers by considering factors such as their quality, cost, scale of business and reputation. The Group also prefers vendors who have implemented green practices in their business operations and manufacturing processes. The Group undertakes regular reviews to ensure that its partners do not cause significant negative impacts to the environment and society. If any significant negative environmental or social impact is found to be caused by its selected suppliers, the Group may consider terminating the cooperation with them.

Personal Data Protection

Protection of data privacy is pivotal in the business the Group operates. It is the Group's responsibility to protect the privacy of personal data of its employees, customers and business partners. The Group abides by the Personal Data (Privacy) Ordinance (Cap. 486 of the Laws of Hong Kong) and other applicable local laws to take special care of sensitive and personal information.

The Group collects and uses confidential information in a responsible and non-discriminatory manner by restricting the use of information to purposes consistent with those stated in the contracts engaged with its customers and business partners. As the Group has to handle a substantial amount of sensitive personal information, it has set up rules for its employees and relevant parties to follow along. As stipulated in the rules, no employees should gain access to, copy or reproduce any content of the customer profiles without authorisation. In addition, the Group has installed and maintained regular updates of its firewall and anti-virus software to protect confidential information against hackers.

營運實務

供應鏈管理

本集團高度重視供應商的選擇、管理及監控。本集團期望其供應商能夠如本集團般保護環境，珍惜資源，遵守所有法律法規，並公平對待僱員。

本集團堅持對選擇供應商採取公開、公平及透明的原則。本集團的供應商主要包括(i)為本集團硬件銷售供應硬件(主要是伺服器)的硬件供應商；及(ii)為本集團伺服器寄存服務出租數據中心機架空間的數據中心營運商及出租網絡系統的網絡系統提供商。

在選擇供應商時，本集團會透過考慮質素、成本、業務規模及聲譽等因素以評估供應商。本集團亦更傾向於選擇在業務營運及製造過程中採取綠色措施的供應商。本集團會定期進行審核，以確保其合作夥伴不會對環境及社會造成重大負面影響。倘發現選定的供應商對環境或社會有任何重大負面影響，本集團可能會考慮終止與彼等的合作。

個人資料保護

保護資料隱私是本集團所營運業務的關鍵。保護僱員、客戶及業務合作夥伴個人資料的隱私是本集團的責任。本集團恪守個人資料(私隱)條例(香港法例第486章)及其他適用地方條例，以在處理敏感及個人資料時格外注意。

本集團秉持負責任及無差別對待的原則收集及使用機密資料，嚴格遵照與其客戶及業務合作夥伴訂立的合約中規定的目的使用有關資料。由於本集團須處理大量敏感的個人資料，因而訂立規則供其僱員及有關人士遵守。誠如規則所訂明，在未經授權情況下，僱員及相關人士概不得取得、複製或複印任何客戶資料內容。此外，本集團已安裝並定期更新防火牆及防毒軟件，以保障機密資料免遭黑客入侵。

ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

環境、社會及管治報告

Service Quality Control

To remain as a leading financial trading software solutions developer and related service provider, the Group provides flexible, scalable and cost-effective online front-end trading and back-office systems for trading global financial products to banks and brokerage firms in Hong Kong.

In order to meet the customers' requirements, the Group has established a quality assurance team to develop a sustainable performance-oriented culture with an emphasis on pursuing continuous improvement rather than adopting a short-term and project based approach. To ensure that the Group's systems meet its customers' requirements without deficiency, the quality assurance team is responsible for running various tests on the Securities Back Office System and Futures Back Office System in accordance with a standard checklist.

For the Securities Front Office System and Futures Front Office System, the Group assists customers in the market rehearsal arranged by the Hong Kong Exchanges and Clearing Limited to conduct testing on server and system connectivity. For modification/customisation of the Securities Front Office System and Futures Front Office System, testing works are handled by the Group's development team. Firstly, the Group conducts tests on an individual basis. Then the Group may conduct an integration test of software systems in case the modification/customisation works affect parts of the software systems. For the Forex and Bullion Front and Back Office Systems which do not connect to any exchange, products will be tested internally prior to their delivery to the Group's customers.

If there is any defect in any of the above-mentioned tests, the product will be returned to the development team for rectification. After the products are installed, a user acceptance test would be conducted on the Group's products. Upon completion of the user acceptance test, customers would then sign the user acceptance test form to acknowledge their acceptance that the software system meets their functional specifications and performance requirements.

In case of any bugs reported by the customers after the installation, the Group's customer service department would record the complaints and problems, liaise with the Group's product development team to make sure these bugs are fixed and to prevent them from reoccurrence. The Group believes that customers' feedback could provide fruitful suggestions for its continuous enhancement.

Due to the Group's business nature, the policies on health and safety, advertising and labelling relating to products and services are not considered material to the Group and would not be disclosed in this ESG Report.

During the Year, the Group was not aware of any violation of any relevant laws and regulations that have a significant impact on the Group in relation to health and safety, advertising and labelling of the services and products provided by the Group.

服務質素控制

為繼續成為領先的金融交易軟件解決方案開發商及相關服務供應商，本集團提供靈活、可擴展且具成本效益的以買賣環球金融產品的線上前端交易及後台系統予香港銀行及經紀行。

為符合客戶要求，本集團已成立質素保證團隊，以建立注重可持續表現的文化，強調持續追求而非短期及限於某個項目的改進。為確保本集團的系統無缺陷以滿足客戶要求，質素保證團隊負責按照標準清單對後台證券交易系統及後台期貨交易系統進行各種測試。

對於前台證券交易系統及前台期貨交易系統，本集團協助客戶在香港交易及結算所有限公司的市場演習中進行伺服器及系統連接測試。若需要進行修改／客製化前台證券交易系統及前台期貨交易系統，則由本集團的開發團隊處理測試工作。首先，本集團進行個別測試。之後本集團可能會進行軟件系統集成測試，以防有關修改／客製化調整影響軟件系統的其他部分。對於不連接任何交易所的前台及後台外匯及貴金屬交易系統，產品將在交付予本集團客戶之前在內部進行測試。

若上述測試中發現任何缺陷，產品會退回開發團隊進行修正。產品安裝後會對本集團的產品進行用戶驗收測試。完成用戶驗收測試後，客戶將簽署用戶驗收測試表，以確認軟件系統符合其功能規格及性能要求。

倘客戶於安裝後匯報任何漏洞，本集團客戶服務部將把投訴及問題記錄在案，繼續與本集團產品開發團隊溝通，確保該等漏洞得到修正及避免漏洞再次出現。本集團認為，客戶的反饋可為本集團持續提升提供寶貴建議。

由於本集團業務性質，本集團認為有關產品及服務的健康與安全、廣告及標籤的政策並非重大方面，不會於本環境、社會及管治報告中披露。

於年內，本集團並無知悉任何違反有關本集團所提供產品和服務的健康與安全、廣告及標籤，且對本集團有重大影響的任何相關法律及法規。

Intellectual Property Rights

Since intellectual property rights are valuable assets to any business, protecting intellectual property rights is beneficial and important for the global economy and further growth in research and innovation.

According to the Copyright Ordinance (Cap. 528 of the Laws of Hong Kong), copyright is defined as the right given to the owner of an original work. The copyright owner has the right to reproduce its work in any form or issue copies of its work. It is an infringement for a third party to conduct these acts without the consent of the copyright owner. If an infringement of intellectual property rights is found, the copyright owner can bring an action seeking damages or an injunction to restrain the unauthorised copying.

Currently, the Group has implemented the following key policies and procedures to ensure the efforts of its software programmers and the assets of the Group are properly protected so as to create an environment that its creativity and hard work can be rewarded:

- The Group's customers only have access to software files encoded in a computer-readable form for the sole purpose of installation but have no access to human-readable source codes of the software written and developed by the Group in order to protect creators' effort;
- Most of the customers who purchase the Group's software systems are required to execute a standard sales contract, which contains a clause stating that all elements and components in the software systems, relevant documentation, and all intellectual property rights and other proprietary rights embodied thereof shall remain as the Group's property;
- The Group has drawn its employees' attention to the Group's policies on business conduct, confidentiality and restrictions in the course of employment in the standard employment contract, which contains a clause stipulating that the intellectual property rights for the works or materials created by the employees of the Group during the period of employment shall vest in and remain the sole and exclusive property of the Group;
- Employees of the Group are strictly prohibited from using, divulging or exchanging with any third parties confidential information which they may have come to possess during their employment with the Group. Exposing confidential information relating to the business operation of the Group and its customers may result in a violation of business conduct and legal actions; and
- In order to ensure that only employees who are responsible for the development of the Group's software systems may have access to the source codes, the source codes are protected by a source code management tool with permission setting controls for each user such that access to the source codes by the employees of the Group is limited.

知識產權

由於知識產權對任何業務都是屬於寶貴的資產，保障知識產權有利於全球經濟及進一步發展研究及創新，且甚為重要。

根據版權條例（香港法例第528章），版權界定為給予原創作品擁有人的權利。版權擁有人有權以任何形式複製或發佈作品複本。倘第三方在未經版權擁有人同意下進行該等行為，即屬侵權。一經發現侵犯知識產權，版權擁有人可經訴訟追討賠償，或申請禁制令以禁止未經授權的複製。

目前，本集團已實行下列關鍵政策及程序，以確保其軟件程式編製員的努力及本集團的資產得到妥善保障，從而創造一個令其創意及努力能得到回報的環境：

- 本集團客戶僅有權使用以電腦可讀形式編碼的軟件文件，僅供安裝用途，惟無權使用本集團編寫及開發的人類可讀軟件源代碼，以保障創作者的心血；
- 大部分向本集團購買軟件系統的客戶須簽立標準銷售合約，當中載有訂明軟件系統中的所有元素及組件、相關文檔以及一切知識產權及其他產權仍屬於本集團財產的條款；
- 本集團已在標準僱傭合約中提醒僱員注意有關本集團業務操守、保密及受聘過程中的限制的政策，而該合約中亦載有條款訂明本集團僱員於受聘期間創作的作品或資料的知識產權歸屬於本集團，並仍為本集團專有及獨有的財產；
- 本集團的僱員嚴禁使用、向任何第三方洩露或交流任何於其與本集團之僱傭合約期間內可能獲得的機密資料。洩露有關本集團業務經營及其客戶的機密資料可導致違反業務操守及招致法律行動；及
- 為確保僅有負責開發本集團軟件系統的僱員可取得源代碼，源代碼以源代碼管理工具保護，針對每名用戶設定授權控制，從而限制本集團僱員取得源代碼的途徑。

ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

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During the Year, the Group was not aware of any material non-compliance with the Copyright Ordinance (Cap. 528 of the Laws of Hong Kong), the Trade Marks Ordinance (Cap. 559 of the Laws of Hong Kong) and other applicable local laws for intellectual property rights.

Anti-corruption

Maintaining an ethical working environment is one of the Group's core values. The Group has set up zero-tolerance policies towards any misconduct, an anti-bribery policy, a whistle-blowing policy and a range of channels for redress. As clearly stated in the employee handbook and code of conduct, the Group's employees are encouraged to report any incidents of corruption, bribery, extortion, fraud and money laundering.

In order to carry out these policies effectively, the Group strives to protect the legitimate rights and interests of whistleblowers so employees can report any misconduct without their profiles being exposed and their reporting contents would be kept as confidential information. The Group treats these reports in a cautious and careful manner with a hope to encourage employees to pro-actively report any presence of malpractices or improprieties, which would help create a fair working environment. Any proven misconduct case would lead to disciplinary action, dismissal or be reported to the Independent Commission Against Corruption or relevant agencies.

During the Year, the Group was not aware of any material non-compliance with the laws and regulations pertaining to the prevention of bribery, extortion, fraud and money laundering including the Prevention of Bribery Ordinance (Cap. 201 of the Laws of Hong Kong).

ENVIRONMENT

The Group acknowledges its responsibility to protect the environment. As such, the Group has integrated environmental considerations into its business operations, including but not limited to minimising pollution, utilising energy efficiently and reducing waste in its daily operations.

As the Group is principally engaged in the service industry where its nature does not involve any direct production of exhaust gases (including nitrogen oxides and gaseous sulphur oxides), discharge of wastewater, discharge into land and generation of hazardous waste, there is no direct emission of such pollutants made by the Group. In addition, since the operations of the Group do not involve any gaseous fuel consumption and the Group does not own any vehicles, no significant air pollutants and direct greenhouse gases ("GHG") are emitted.

於年內，本集團並無知悉任何嚴重違反版權條例（香港法例第528章）及商標條例（香港法例第559章）以及其他有關知識產權的適用地方法例。

反貪污

維持良好的工作環境是本集團的核心價值之一。本集團制定對任何不當行為的零容忍政策，反賄賂政策，舉報政策以及一系列渠道改正違規行為。誠如僱員手冊及行為守則所明確規定，本集團鼓勵僱員舉報任何貪污、賄賂、勒索、欺詐及洗錢事件。

為有效地執行該等政策，本集團致力保護舉報人的合法權益，藉此僱員可以舉報任何不當行為而不會暴露其個人資料，舉報內容將得到保密。本集團審慎對待該等舉報，以期鼓勵僱員積極舉報任何舞弊或不當行為，從而營造公平的工作環境。任何經證實的不當行為都將導致紀律處分、解僱或向廉政公署或相關機構舉報。

於年內，本集團並不知悉任何嚴重違反防止賄賂、勒索、欺詐及洗錢相關法律及法規的情況，包括防止賄賂條例（香港法例第201章）。

環境

本集團知悉其保護環境的責任。因此，本集團在業務過程中融入環保理念，包括但不限於減少污染，有效利用能源及減少日常營運中的浪費。

由於本集團主要從事服務行業，其性質不涉及任何直接生產廢氣（包括氮氧化物及氣態硫氧化物），廢水排放、向土地排污及生產有害廢棄物，本集團並未直接排放該等污染物。此外，由於本集團的營運不涉及任何氣體燃料消耗且本集團並未擁有任何車輛，故並無重大空氣污染物及直接溫室氣體（「溫室氣體」）排放。

ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

環境、社會及管治報告

Air and Greenhouse Gas Emissions

The main source of energy consumption of the Group came from the electricity usage in daily operational activities including lighting, office equipment and other miscellaneous items.

To reduce the GHG emissions effectively, the Group has deployed a series of measures which are set out in details in the section headed "Use of Resources" of this ESG Report. Moreover, the Group has signed the Carbon Reduction Charter issued by the Environment Bureau of the Government of Hong Kong Special Administrative Region, under which the Group has undertaken to carry out various measures to mitigate GHG emissions, improve energy efficiency, conserve energy and raise public awareness of environmental protection.

The Group's performances in GHG emissions and energy consumption during the Year are as follows:

GHG emissions 溫室氣體排放	2019 二零一九年	2018 二零一八年	Unit 單位
Scope 2 – Indirect emission 範圍2 – 間接排放	53.85	53.57	Tonnes of CO ₂ e 以噸二氧化碳當量計
Scope 3 – Business travel 範圍3 – 差旅	0.84	0.33	Tonnes of CO ₂ e 以噸二氧化碳當量計
Total emissions 總排放量	54.69	53.90	Tonnes of CO ₂ e 以噸二氧化碳當量計
Total emissions intensity 總排放密度	0.80	0.87	Tonnes of CO ₂ e/employee 二氧化碳排放噸數／僱員
Energy consumption 能源消耗	2019 二零一九年	2018 二零一八年	Unit 單位
Total energy consumption 能源消耗總量	102,494.00	103,688.00	kWh 千瓦時
– Electricity – 用電	102,494.00	103,688.00	kWh 千瓦時
Energy consumption intensity 能源消耗密度	1,507.26	1,672.39	kWh/employee 千瓦時／僱員

During the Year, the Group was not aware of any non-compliance with the relevant laws and regulations relating to air and GHG emissions which had a significant impact on the Group.

廢氣及溫室氣體排放

本集團的主要能源消耗來自日常營運活動中的用電，包括照明、辦公設備及其他物品。

本集團制定本環境、社會及管治報告「資源使用」一節中詳述的一系列措施，從而有效地減少溫室氣體排放。此外，本集團簽署香港特別行政區政府環境局發出的《減碳約章》，據此，本集團承諾開展各項措施以減少溫室氣體排放，提高能源效率，節約能源及提高公眾的環保意識。

本集團於年內在溫室氣體排放及能源消耗方面的表現如下：

於年內，本集團並不知悉任何違反有關廢氣及溫室氣體排放且對本集團有重大影響的相關法律及法規。

ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

環境、社會及管治報告

Wastes

Due to the nature of its business, the Group did not make any significant impact on the environment and natural resources and no significant hazardous waste or packaging material was generated in connection with its businesses during the Year.

The wastes produced by the Group during the Year were non-hazardous wastes, which included paper wastes and electronic wastes. Paper wastes were collected for recycling by utilising the 3-coloured waste separation bins placed at the office. Although the amount of electronic wastes generated by the Group during the Year was not substantial, the Group ensured that these electronic wastes were properly handled by eligible parties who had participated in the Producer Responsibility Scheme on Waste Electrical and Electronic Equipment implemented by the Government of Hong Kong Special Administrative Region.

The amount of wastes produced by the Group during the Year is as follows:

Non-hazardous wastes 無害廢棄物	2019 二零一九年	2018 二零一八年	Unit 單位
Total non-hazardous wastes produced 已產生無害廢棄物總量	0.52	0.51	Tonnes
– Paper wastes – 廢紙	0.36	0.42	Tonnes
– Electronic wastes – 電子廢物	0.16	0.09	Tonnes
Non-hazardous wastes intensity 無害廢棄物密度	0.01	0.01	Tonnes/employee

During the Year, the Group was not aware of any material non-compliance with the Waste Disposal Ordinance (Cap. 354 of the Laws of Hong Kong) and other applicable laws and regulations in relation to discharges into water and land, and generation of hazardous and non-hazardous wastes.

Water Use Management

During the Year, the Group did not encounter any issues in sourcing water. As the water supply and discharge is fully controlled and managed by the property management company, it is not feasible for the Group to install an independent water sub-meter to measure its water consumption and the results achieved in reducing water consumption.

Although the Group's business activities do not consume large volume of water, the Group still endeavours to promote water conservation in the office. To avoid unnecessary water consumption from daily operation, the Group promotes good staff behaviour by encouraging employees to always turn taps off tightly and to use efficient water-saving products in priority.

廢棄物

由於本集團的業務性質，其對環境及天然資源並無任何重大影響，其業務於年內沒有產生重大有害廢棄物或包裝材料。

本集團於年內產生的廢棄物屬無害廢棄物，包括廢紙及電子廢物。辦公室放置三色廢物分類回收桶以收集並回收廢紙。儘管本集團於年內產生的電子廢物數量不大，本集團確保由參加香港特別行政區政府實施的廢電器電子產品生產者責任計劃的合格人員妥善處理該等電子廢物。

本集團於年內產生的廢棄物數量如下：

於年內，本集團並不知悉任何嚴重違反《廢物處置條例》(香港法例第354章)及其他有關向水及土地排污以及有害及無害廢棄物的產生的適用法例法規的情況。

管理用水

於年內，本集團於求取水源上並無遇到任何問題。由於用水供應及排放均完全由大廈管理公司控制及管理，本集團無法安裝獨立的用水分錶以計算其用水消耗及減少用水消耗取得的成效。

儘管本集團的業務活動並未消耗大量用水，惟本集團仍致力於在辦公室推廣節約用水。為避免日常營運中不必要的用水量，本集團透過鼓勵僱員時刻緊記關上水喉及優先使用高效的節水產品以促進員工的良好行為。

ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

環境、社會及管治報告

Use of Resources

Policies on efficient use of resources

With reference to the 4R (reduce, reuse, recycle and replace) Environmental Management Model, the Group has taken the following measures:

- Comply with all relevant and applicable environmental protection laws, regulations, standards and guidelines;
- Set up an effective management system to prevent pollution and reduce the impact made to the environment;
- Consume energy and water efficiently to optimise the Group's business operations;
- Utilise resources effectively and keep in mind with the 4R Environmental Management Model which could help reduce excess waste generation; and
- Encourage employees to provide feedback in the application of the 4R Environmental Management Model for enhancing future implementation.

Green practices

The Group has carried out the following measures in its daily operations to further reduce the impact of its business activities on the environment and natural resources:

- Set the temperature of air conditioners in its offices at 24°C–26°C;
- Clean the filter screens of air conditioners regularly to enhance their cooling efficiency;
- Give priority to electrical appliances with energy efficient functions when purchasing new electrical appliances;
- Encourage employees to switch off photocopying machines, printers and computers or turn them into sleep mode when they are not in use;
- Switch off lightings and electronic devices when they are not in use;
- Use teleconference or other means of electronic communication mediums instead of overseas business trips to reduce carbon footprint from travelling by airplanes; and
- Use energy saving light bulbs, LED lightings and other energy saving electrical appliances at its offices.

資源使用

提高資源效用的政策

經參考4R(即Reduce減少使用、Reuse物盡其用、Recycle循環再用及Replace替代使用)環保管理模式，本集團已採取下列措施：

- 遵守所有相關及適用環保法例、規例、標準及指引；
- 制定有效的管理制度，防止污染及減少對環境的影響；
- 高效節能及節水來優化本集團的業務營運；
- 有效利用資源並謹記4R環保管理模式以助減少產生過多廢棄物；及
- 鼓勵僱員反饋4R環保管理模式的應用，加大日後實施力度。

綠色實踐

本集團於其日常經營中採取以下措施，以進一步減少業務活動對環境及天然資源的影響：

- 將辦公室的空調溫度設置為24°C至26°C；
- 定期清洗空調過濾網，提高冷卻效率；
- 購買新電器時優先購買帶有節能功用的電器；
- 鼓勵僱員關掉不使用的影印機、打印機及電腦或切換為睡眠模式；
- 不使用時將照明設備及電子設備關掉；
- 使用電話會議或其他電子通訊方式代替海外商務旅行，以減少因乘坐飛機所製造的碳足跡；及
- 在辦公室使用節能燈泡、LED照明及其他節能電器。

ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

環境、社會及管治報告

Policies on waste reduction

The Group has made every effort to reduce waste by taking the following actions:

- Use electronic communications for publishing announcements, event reporting, soliciting recommendations and receiving feedback if possible;
- Widely adopt the use of elemental chlorine-free papers;
- Use double-sided printing/copying if possible;
- Encourage an attitude of “think before printing”, such as sharing documents with co-workers or printing only the number of copies or exact pages they need;
- Make use of the 3-coloured waste separation bins to collect recyclable items;
- Arrange authorised recycling company to collect toner cartridges for recycling; and
- Reuse office supplies including envelopes, document clips and paper bags.

The Group aims to reach its goals in saving energy, reducing wastes and promoting a green office by applying the above measures. As building a green office is a long-term target of the Group, the Group will continue to evaluate its performance and seek for opportunities to reduce further emissions and wastes so that the Group can minimise its impacts on the environment and natural resources.

COMMUNITY INVESTMENT

The Group is committed to its social responsibility. The Group has actively engaged in social welfare activities and donated its resources to those who are in need within the community. During the Year, the Group made charitable contributions of HK\$220,000 (2018: HK\$294,000), which included sponsorship for the summer activities held by Hong Kong Sea Cadet Corps and donations to Tsung Tsin Mission of Hong Kong Social Service Shatin Integrated Service Centre and Charity Walk and Run 2019. The donations were mainly made to the underprivileged groups. The Group is honoured to receive another year of the “Caring Company” award from the Hong Kong Council of Social Service in recognition of its contributions to the community.

減廢政策

本集團透過採取下列措施竭力減少廢物：

- 使用電子通信發佈公告、活動報告、推薦徵集及收集反饋(倘可能)；
- 廣泛採用無氯紙；
- 使用雙面打印／複印(倘可能)；
- 鼓勵「打印前思考」的態度，例如與同事共享文件或僅打印所需的份數或確切頁面；
- 使用三色廢物分類箱以收集可回收物料；
- 安排認可回收公司對碳粉盒進行回收；及
- 重複使用辦公用品，包括信封、文件夾及紙袋。

通過應用上述措施，本集團旨在實現節能、減廢及推廣綠色辦公室的目標。由於構建綠色辦公室乃本集團的長遠目標，本集團將繼續評估其表現並尋找機會進一步減少排放及廢物，以盡量減少對環境及天然資源所造成的影響。

社區投資

本集團致力履行其社會責任。本集團積極參與社會公益活動，並為社區內有需要者捐贈資源。於年內，本集團作出慈善捐款220,000港元(二零一八年：294,000港元)，當中包括贊助香港海事青年團舉辦的夏季活動及捐款給香港崇真會社會服務部沙田綜合服務中心以及「甦Walk慈善行•跑步賽2019」。捐款對象主要為弱勢群體。本集團很榮幸再次獲香港社會服務聯會頒發「商界展關懷」獎項，以表揚其對社會所作出的貢獻。



**FINSOFT FINANCIAL INVESTMENT
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