



順風國際清潔能源有限公司
SHUNFENG INTERNATIONAL CLEAN ENERGY LIMITED



**WORLD'S LEADING
CLEAN ENERGY PROVIDER**

**LOW-CARBON & ENERGY-SAVING
INTEGRATED SOLUTIONS PROVIDER**

2021



ENVIRONMENTAL, SOCIAL AND
GOVERNANCE REPORT





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ABOUT THIS REPORT

PURPOSE

Shunfeng International Clean Energy Limited ("SFCE", or the "Company", together with its subsidiaries, collectively the "Group" or "We") is pleased to present this Environmental, Social and Governance ("ESG") Report (the "Report"). The Report aims to outline the Group's sustainability approaches, strategies and performances.

REPORTING PERIOD AND SCOPE

Unless otherwise stated, the Report mainly focuses on our sole continuing operation segment of solar power generation in the People's Republic of China (the "PRC" or "China") from 1 January 2021 to 31 December 2021 (the "Reporting Period").

REPORTING FRAMEWORK

The Report has been prepared in accordance with the latest disclosure requirements of the Environmental, Social and Governance Reporting Guide ("ESG Reporting Guide") set out in Appendix 27 to the Rules Governing the Listing of Securities on The Stock Exchange of Hong Kong Limited (the "Listing Rules") issued by Hong Kong Exchanges and Clearing Limited ("HKEx"). The content index of the ESG Reporting Guide is attached to the Report for the convenience of the stakeholders.

REPORTING PRINCIPLE

During the preparation of the Report, the Group adhered to the following reporting principles including materiality, quantitative, balance and consistency, as outlined in the ESG Reporting Guide. For details, please refer to the table below.



Principle	What it means	Response of the Group
Materiality	The ESG issues covered in this Report should be sufficiently important to investors and other stakeholders.	Through materiality assessment, the Group identifies the ESG topics that are material to various stakeholders. A total of 8 material issues were identified based on the results of the stakeholders' ratings in the stakeholder engagement exercise. For details of the assessment processes and results, please refer to the sections headed "Stakeholder Engagement" and "Materiality Assessment".
Quantitative	The Report should disclose key performance indicators in a way that is measurable and conduct comparison when appropriate.	As far as practicable, the Group discloses its key environmental and social performance indicators collected from relevant departments with quantitative measures.
Balance	The Report should present the positive and negative information of the Group in an objective manner.	The Group has identified and disclosed the ESG issues that have significant impact on the Group's business in the Report, which include the achievements it has made and the challenges it faces.
Consistency	The Group should confirm that the method used in preparation of the ESG Report is consistent with that adopted for the prior year, or state the revised reporting methods, or illustrate other relevant factors that will draw meaningful comparisons.	The reporting scope and reporting methodology are substantially consistent with those of the prior year, and explanations would be provided for changes in the reporting scope and reporting methodology, where applicable.



INFORMATION AND CONTENT OF THE REPORT

The information, data and cases set out in the Report are derived from relevant documents provided by departments or integrated operational statistics of the Group.

The Report was endorsed by the senior management and was approved for publication by the Board of Directors on 24 May 2022.

ACCESS TO THIS REPORT

The Report is available for download at the website of the Hong Kong Stock Exchange (www.hkexnews.hk) and the official website of the Group (<http://sfcegroup.com>). The Report is published in both Chinese and English. In case of any discrepancy between the two versions, the English version shall prevail.

YOUR FEEDBACK

We are dedicated to listening feedback from our stakeholders in respect of our sustainability efforts and the Report. Your opinions and suggestions are valuable for our continual improvement on managing and achieving sustainable development. Please send us your comments by email at ir@sfcegroup.com.

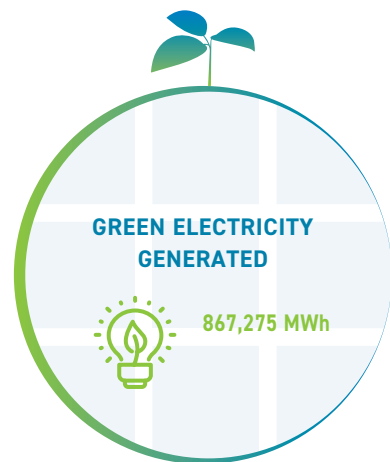
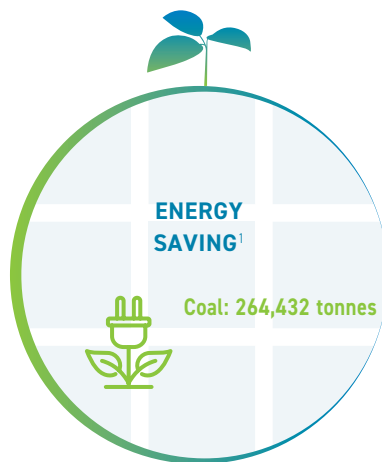
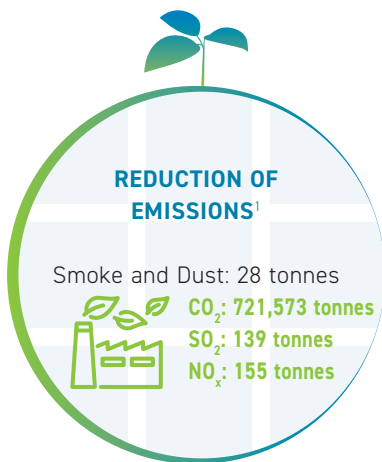


ABOUT THE GROUP

SFCE is a leading clean energy, low-carbon and energy-saving solutions provider. The Group is committed to creating a low-carbon environment and contributing to the world energy mix transition process. Upholding consistently steady corporate governance and innovation-driven development, we produce clean energy solutions that have been widely recognized by the market.

HIGHLIGHT

2021 Group's Environmental Highlights ¹



¹ The basis of calculation is sourced from China Electricity Industry Development Report 2021 issued by China Electricity Council.

OUR SUSTAINABILITY APPROACH



Led by our mission to be “the world’s leading clean energy provider”, our dedication to sustainable growth begins with responsibly managing the operations. We are devoted to incorporating ESG considerations into our business. We believe that sustainability encompasses not only our environmental performance and contribution to the wider community, but also underpins our core business practices and our relationships with residents, shareholders, employees and suppliers.

The Group promotes sustainable development in pursuit of being a low-carbon and energy saving integrated solutions provider based on the four priority areas: (i) Low Carbon Solution, (ii) Green Operation, (iii) Talent Management and (iv) Community Care.

ALIGNING WITH THE SUSTAINABLE DEVELOPMENT GOALS

The 17 United Nations 2030 Sustainable Development Goals (“SDGs”) demonstrate the sustainable development direction and needs of the world, thus providing helpful medium to long term signals on emerging opportunities and risks for business to consider when developing or reviewing their business objectives and strategies.

While we acknowledge that each of the 17 SDGs is equally vital and essential in building a healthier world, we believe that the best way for us to make a meaningful contribution is by supporting a selected number of SDGs that will guide us to develop long-term performance standards and targets through working on our priority areas.

Low Carbon Solution

Moving towards a greener and cleaner future

To leverage our low carbon solutions to create a sustainable future by:

- One-stop-shop clean energy solution
- Well-planned project management
- Responsible procurement



Green Operation

Pursuing a sustainable operation pattern to protect our planet

To reduce the ecological footprint in our operation to combat climate change by:

- Adoption of renewable energy
- Conservation of energy, carbon, water, waste and biodiversity

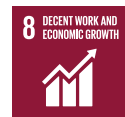


Talent Management

Cultivating a decent people-centric workplace

To cultivate a corporate culture that embraces talent development, employee wellbeing and family-friendly practices by:

- Safety measures
- Wellness programs
- Friendly working environment



Community Care

Nurturing wellbeing in our community

To proactively engage in community investment to give back to society by poverty alleviation





SUSTAINABILITY GOVERNANCE

A solid ESG governance structure is essential for driving long-term sustainable values. The Group considers risk management as an integral part of daily management and sound ESG governance. Our Board of Directors (the "Board") has overall responsibility for the ESG strategies and overseeing the ESG issues of the Group.

Delegated by the Board, our senior management is responsible for the implementation of ESG management approach and advising the Board on matters including the following from time to time.

- Formulating and constantly reviewing the Group's ESG strategies, priorities, goals and targets of the Group;
- Identifying and monitoring the material ESG-related risks and opportunities (including but not limited to climate-related risks and ESG risks along the supply chain) to prevent and mitigate the related risk;
- Developing, revising and assessing the implementation of ESG-related policies and initiatives;
- Keeping track of and assessing the Group's ESG performance and progress against the goals and targets;
- Reviewing and monitoring the Group's stakeholder engagement channels to ensure ongoing dialogues to understand the expectations of the key stakeholders; and
- Preparing ESG report to reflect the sustainability performance for the Board's approval.

ESG RISK MANAGEMENT

We are dedicated to strengthening our sustainability performance with an effective ESG risk management mechanism in place. Our risk management mechanism assists the Group in evaluating and minimizing risks that may prevent or endanger the achieving of its business objectives in a dynamic business environment where economic, industry, regulatory and operating conditions continue to change. A comprehensive ESG risk assessment has been performed in order to strengthen risk mitigation and response.

With the assistance of an independent professional third party, we have identified and assessed the ESG risks that might have a significant impact on our business operations. To prioritize ESG risks, including but not limited to climate-related risks and ESG risks along the supply chain, we have determined risk levels according to the likelihood and significance of the potential risks.

In order to manage ESG risks, we have formulated corresponding risk mitigation measures, coupled with sound internal controls, for each of the ESG risks identified and delegated related business departments to implement the measures to minimize the risks from disrupting our business operations.

STAKEHOLDER ENGAGEMENT

Stakeholder engagement is a crucial process in our journey toward sustainable growth, and drives us to enhance our sustainability performance by continuously refining our ESG strategy. We have identified customers, employees, investors and shareholders, business partners (including research and development institutions), suppliers, government authorities and local communities as our major stakeholder groups. Engaging with stakeholders allows us to better shape our business strategy to respond to their needs, anticipate risks and strengthen key relationships. We maintain close communication with stakeholders through various formal and informal channels in our daily operations.



Stakeholder Types	Channels	Frequency	Matters of Concern	The Group's Responses
Customers	<ul style="list-style-type: none"> • Business communication • Meetings • Customer service hotline 	<ul style="list-style-type: none"> • Periodically 	<ul style="list-style-type: none"> • Service quality • Privacy • Honest contract performance 	<ul style="list-style-type: none"> • Improving service quality • Strengthening data security
Employees	<ul style="list-style-type: none"> • Internal communication system • Meetings • Annual appraisal • Company activities • Social media 	<ul style="list-style-type: none"> • Annually (performance appraisal) • On-going (day-to-day communication) 	<ul style="list-style-type: none"> • Sound welfare • Good career development • Comfortable working environment 	<ul style="list-style-type: none"> • Providing diverse employee activities • Providing training
Investors and shareholders	<ul style="list-style-type: none"> • Shareholders' meetings • Annual reports, financial statements and announcements • Corporate websites • Social media 	<ul style="list-style-type: none"> • Annually (General Meeting) • When necessary (for other meetings) 	<ul style="list-style-type: none"> • Good business performance • Good corporate governance • Risk control and integrity • The Company's strategic direction • Sufficient disclosure 	<ul style="list-style-type: none"> • Improving corporate governance • Corporate strategy meeting investors' expectations • Factual and sufficient disclosure
Business Partners ²	<ul style="list-style-type: none"> • Daily communication between business representatives • On-site visits • Industry exhibitions 	<ul style="list-style-type: none"> • Periodically 	<ul style="list-style-type: none"> • Mutual benefits • Promotion and innovation of management 	<ul style="list-style-type: none"> • Enhancing communication
Suppliers	<ul style="list-style-type: none"> • Business communication • Meetings 	<ul style="list-style-type: none"> • Periodically 	<ul style="list-style-type: none"> • Win-win cooperation • Honest contract performance 	<ul style="list-style-type: none"> • Increasing investment, being open and transparent
Government Authorities	<ul style="list-style-type: none"> • Information submission • Interviews • Public consultation 	<ul style="list-style-type: none"> • Periodically 	<ul style="list-style-type: none"> • Operating in compliance 	<ul style="list-style-type: none"> • Maintaining compliance with laws and regulations
Local Community	<ul style="list-style-type: none"> • Charitable activities • Social media • Corporate websites 	<ul style="list-style-type: none"> • Periodically 	<ul style="list-style-type: none"> • Charity investment • Safety and environmental protection 	<ul style="list-style-type: none"> • Increasing community investment • Maintaining work safety • Enhancing environmental protection

² Including research and development institutions.



MATERIALITY ASSESSMENT

The Group has engaged an independent third-party consultant to conduct stakeholder engagement via survey to collect opinions from stakeholders to identify our material sustainability issues. A three-step approach is adopted to identify and prioritize the materiality of relevant ESG topics for management and disclosure.

Step 1: Identifying ESG Issues

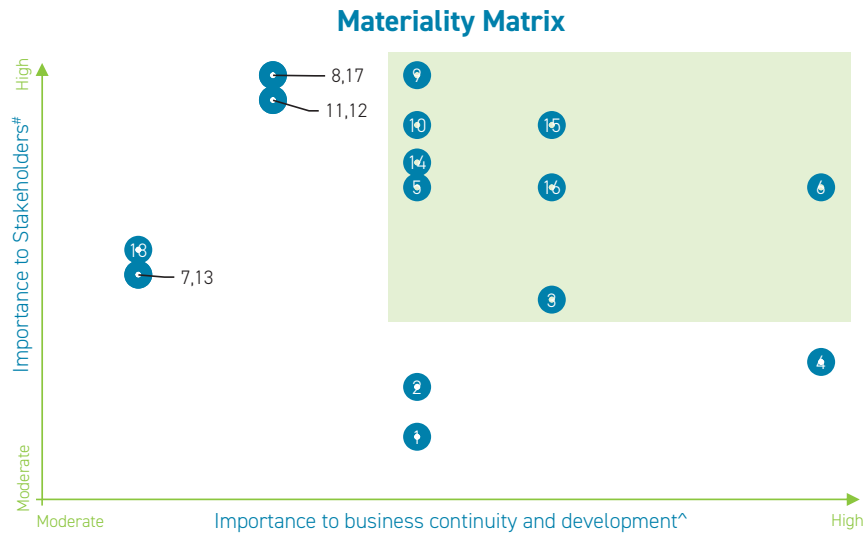
Based on the results of past and existing stakeholder communication and the “ESG Reporting Guide” of HKEx, 18 relevant ESG issues have been identified.

Step 2: Collecting Stakeholders’ Ratings

We have delivered an online questionnaire to our stakeholders to gather their comments and concerns regarding the Group’s ESG performance by rating the relative importance of ESG issues to the Group on a scale of 1 to 6 (with ‘1’ being not important at all and ‘6’ being very important).

Step 3: Ranking ESG Issues

The result of the questionnaire has then been analysed and transformed into a materiality matrix, demonstrating the importance and impact of 18 issues towards the stakeholders and the Group’s business. A total of 8 material issues were identified this year. Issues at the top right quadrant of the materiality matrix indicated the most material ESG issues identified. We respond to and elaborate on those topics of concern in different sections of this Report.



Importance to stakeholders is determined by external stakeholders' rating of the material issues in terms of their importance to the society/ environment and their relevance to the Group.

^ Importance to business continuity and development is determined by internal stakeholders' rating of the likelihood and level of potential impact of the issues affecting our business continuity and development.



ESG Topics Considered	
1. Air Emission	2. Hazardous and Non-Hazardous Waste
3. Carbon Emission and Energy Efficiency	4. Water Resources
5. Climate-related Risks	6. Green Procurement
7. Supplier Environmental Risk Assessment	8. Employee Welfare
9. Anti-discrimination, Diversity and Equal Opportunities (age, gender, disability, etc.)	10. Occupational Health and Safety
11. Employee Development and Training	12. Employment Compliance
13. Supplier Social Risk Assessment	14. Project Management
15. Customer Service	16. Intellectual Property
17. Anti-corruption	18. Social Investment



Our Sustainability Approach (Continued)



Identified Material Issues	Section in this Report	Page Number
Carbon Emission and Energy Efficiency	Energy and Resource Usage Air Emissions and Greenhouse Gases	17-18
Climate-related Risks	Response to Climate Change	16-17
Green Procurement	Responsible Procurement	14
Anti-discrimination, Diversity and Equal Opportunities (age, gender, disability, etc.)	Labour Practice	22-23
Occupational Health and Safety	Health and Safety	25-26
Project Management	Project Management	13
Customer Service	Project Management Customer Privacy	13
Intellectual Property	Intellectual Property Right	11



ETHICS

All employees of the Company and its subsidiaries are required to abide by the Corporate Code of Conduct (the "Code"). It provides general guidelines to ensure proper and ethical behaviour, compliance with laws and regulations, and compliance with our standard, including the following issues:

- Business Etiquette
- Corruption
- Bribery
- Workplace harassment
- Gambling
- Record keeping
- Use of Company information and property
- Project management
- Health and safety
- Confidentiality
- Procurement
- Contract



All the employees are obligated to report suspicion on any potential improprieties relating to the Company and its subsidiaries. The Group has introduced formal channels and programs to encourage employee in case they encounter any improprieties at work. A whistleblowing mechanism and employee suggestion collection boxes, for instance, allow employees to raise any matters of concern regarding suspected misconduct, malpractice or impropriety without any fear of reprisal. We will make every effort to keep the identity of whistle-blowers and the information reported confidential.

ANTI-CORRUPTION

The Group is dedicated to maintaining highest standard in integrity in all business operations. The Group strictly complies with the laws on anti-corruption and bribery in PRC including but not limited to the Criminal Law of the People's Republic of China. The Group has established a strict anti-corruption policy which clearly prohibits employees from offering or accepting advantages, gifts, or entertainment for the purpose of influencing business decisions from our business partners, including suppliers and contractors.

The Group is devoted to cultivating the culture of integrity among our management personnel and employees. To strengthen the awareness towards improper activities within the Group, regular training regarding improper conduct in the workplace would be organized annually to promote the ethical climate. In addition, all the new joiners would receive induction training regarding the culture and ethical requirement of the Group. Anti-corruption training materials and practical guides are provided for both employees and directors in order to raise awareness of anti-corruption among employees. The training involves laws and regulation regarding anti-corruption, guidance on properly managing conflict of interest and corruption prevention. Through the above training, our employee could be well informed of the related policy and their obligations.

During the Reporting Period, there were no concluded legal cases regarding corrupt practices brought against the Group or its employees and we were not aware of any material non-compliance with regard to the applicable laws and regulations regarding anti-corruption.

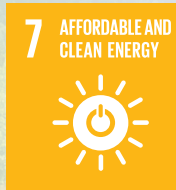
INTELLECTUAL PROPERTY RIGHT

The Group attaches great importance to the protection of intellectual property right. Our commitment to complying with laws and regulations is specified in the Code of Conduct in which all our employees are required to comply with laws and regulations relating to competition, personal data and privacy and intellectual property. To strengthen the protection of the Group's intellectual property, we continue to reinforce our effort on patent applications.

Moving towards a greener and cleaner future

Goal: To leverage our low carbon solutions to create a sustainable future

Selected SDGs:



LOW CARBON SOLUTION



Guided by our mission of creating low-carbon environment that leads to a brighter future to the Earth and human being, the Group is dedicated to explore, develop, and manage various kinds of clean energy to provide diversified integrated clean energies and low-carbon energy solutions.

We adopt a one-stop-shop model that integrates the entire project cycle from development to operation and management stage. We offer an array of photovoltaic clean energy solutions that fulfill the demands of different users. Our centralised photovoltaic power plants are large scale power plants that connect with the national power grid while our distributed photovoltaic plant plants provide small scale solutions to domestic and industrial users to address their needs for self-consumption. As at 31 December 2021, the Group has owned 9 centralised photovoltaic power plants and 11 distributed photovoltaic power plants.

SFCE model



PROJECT MANAGEMENT

The Group highly values the quality management of photovoltaic power plants from cradle to gate. The Group strictly complies with the relevant laws and regulations including but not limited to the the Electric Power Law of the People’s Republic of China (《中華人民共和國電力法》) and the Renewable Energy Law of the People’s Republic of China (《中華人民共和國可再生能源法》). We have implemented a series of procedures to ensure our projects are complying with relevant regulations and standards. Our Project Internal Initiation, Investment Initiation and Construction Management Measure (《項目內部預立項、立項、開工管理辦法》) established a clear framework that states the approval and review process for project development plan, construction drawings, and other professional technical plans.

The Group has also established the Solar Power Plant Operation and Maintenance Manual (《光伏電站運維手冊》) and Operation and Maintenance Management Standards (《運維工作管理標準》) to outline standardized procedures for managing the daily operations of our projects as well as implementing emergency response measures.

We also focus on enhancing our after-sales service by maintaining diverse communication channels such as hotlines and emails to collect customer’s feedback on our product and service quality. For any complaints received, they shall be handled by responsible staff as soon as possible within the prescribed term in strict accordance with internal procedures. During the Reporting Period, we were not aware of any reported customer complaints regarding material defects in quality of our photovoltaic power plants.

During the Reporting Period, we were not aware of any material non-compliance with the relevant laws and regulations relating to health and safety and privacy matters relating to products and services provided.

CUSTOMER PRIVACY

The Group strictly complies with the Civil Code of the People’s Republic of China (《中華人民共和國民法典》), the Personal Information Protection Act of the People’s Republic of China (《中華人民共和國個人信息保護法》), the Data Security Law of the Peoples Republic of China (《中華人民共和國數據安全法》) and the Cyber Security Act of the People’s Republic of China (《中華人民共和國網絡安全法》). The Group has formulated policies and procedures to regulate the handling of personal information in accordance with the national laws and regulations with regard to safeguarding personal information. We have strictly listed out our requirement towards data management in the Employee Handbook and violations would be subject to internal penalty. Important customer files and information are classified as the level-one files and are properly managed by the archive department of the Group, with an aim to ensure the safety and confidentiality of customer information. During the Reporting Period, we were not aware of any incidents of material customer information leakage.



SUPPLIER MANAGEMENT

The Group engages with various suppliers, including raw material providers, module manufacturers, contractors, etc. We seek suppliers who integrate sustainable development into all areas of their business. We strive to always act in an ethical, transparent, and responsible manner, and expect our suppliers as well as their subcontractors to do the same.

Responsible Procurement

We understand the importance of responsible operating practices across our supply chain. The Group follows the principles of transparency, fairness and openness in procurement. We have implemented the Tendering and Price Comparison Management Regulation (《招標比價管理規定》) which clarifies the responsibility of various departments. The measure specifies the price comparison requirement during the procurement process to ensure we can obtain resources at the most reasonable price. We have engaged with an independent third-party consultant to conduct an ESG-related risk assessment so as to identify the potential environmental and social risks along our supply chain. The Board and our senior management would regularly monitor the ESG-related risks and evaluate the effectiveness of corresponding control measures. We also actively explore opportunities in improving sustainability performance through supplier management.

We are committed to operating in accordance with local laws and regulations. Similarly, we expect our suppliers to operate with integrity and treat their people fairly, with reference to our Supplier Management Regulation (《供應商管理規定》), as well as strict standards on corporate governance.

Supplier compliance is evaluated and monitored by procurement centre on an-ongoing basis. For example, our photovoltaic power plant development business assesses suppliers on their overall performance. Suppliers would be divided into three categories based on the assessment result, which are qualified supplier, pre-qualified supplier and disqualified supplier. The result is recorded in our supplier management system and taken into consideration for future supplier selection processes. Any violation of the law or serious misconduct can result in exclusion from invitation to future tendering opportunities.

Similarly, for potential suppliers, a prior review on their background would be conducted to ensure they are in line with the expectation set by the Group. Suppliers are required to provide management certification they obtained such as ISO 9001 Quality Management System certification, OHSAS 18001 Occupational Health and Safety Management system certification, ISO 14001 Environmental Management System certification and any related license and certification. The quality management, ESG performance and compliance of the potential suppliers are assessed by our quality management department. The ESG-related risk in suppliers could be identified through supplier assessment process. We would identify and prioritize the supplier with significantly less adverse environmental and social impacts. Our procurement centre constantly monitors and manages the performance and compliance of the suppliers to prevent and mitigate the ESG-related risk along the supply chain. Suppliers are encouraged to provide environmentally friendly alternatives for consideration in the procurement process such as local procurement to reduce carbon footprint of transportation, use of fewer packaging materials to reduce unnecessary waste, and prioritizing the use of energy-efficient equipment such as LED to promote efficient use of resources.

To ensure the assessment is conducted in a fair manner, the assessment panel consists of different parties to examine specific performance, including power plant operator, quality control team, finance team and technical and construction contractor.

During the Reporting Period, the Group has 60 major suppliers, which are all located in mainland China and are all qualified suppliers complying with the requirements of the procurement regulations and tendering procedures.

Pursuing a sustainable operation pattern to protect our planet

Goal: To reduce the ecological footprint in our operation to combat climate change

Selected SDGs:



GREEN OPERATION



Climate change has been one of the crucial issues over the past decade. The Group actively responds to global climate change policies and national energy strategies, minimises the impact of our operation, and strengthens our own environmental management system in the field of clean energy, energy conservation, and environmental protection.

We strictly abide by the laws and regulations and standards in relation to environmental protection, including but not limited to the Environmental Protection Law of the People’s Republic of China (《中華人民共和國環境保護法》) and the Law of the People’s Republic of China on the Prevention and Control of Atmospheric Pollution (《中華人民共和國大氣污染防治法》). During the Reporting Period, we were not aware of any material non-compliance with the relevant laws and regulations relating to environmental protection.

RESPONSE TO CLIMATE CHANGE

To combat and manage the risk arising from climate change, the Group actively integrate climate resilience in our sustainability strategy and approaches. We have also carried out an ESG risk assessment to identify potential climate-related risks that may pose threats to our business. Moreover, we continuously evaluate the effectiveness of existing mitigation measures and room for improvement, further strengthening our business resilience towards climate change. With reference to the recommendations of the Task Force on Climate-related Financial Disclosures (“TCFD”), the Group has applied the following mitigation measures in response to the climate-related risk identified below.



Physical Risk		
Extreme Weather	Impacts to the Group	Mitigation Measures
	<ul style="list-style-type: none"> Increased maintenance cost for damage caused by extreme weather; Generation volume may be affected by extreme weather, thereby affecting its revenue; Employee safety issues caused by extreme weather. 	<ul style="list-style-type: none"> Perform regular check on the solar plants. Remote monitoring would be carried out via an online monitoring systems for timely report on any abnormalities; Promote effective and efficient operation of solar plants to offset the impact brought by extreme weather; Provide safety training for employees to enhance their safety awareness and formulate contingency plan to ensure a timely response during emergency.



Transition Risk		
Policy Risk	Impact to the Group <ul style="list-style-type: none"> Government subsidies on renewable energy projects may vary according to the latest regulatory changes. 	Mitigation Measures <ul style="list-style-type: none"> Monitor the emerging market and regulatory trends and ensure the Group's emission meet the legal requirement.
Reputation Risk	Impact to the Group <ul style="list-style-type: none"> Failure to meet the social expectation on the Group's ESG performance may negatively affect our reputation and result in loss of potential customers. 	Mitigation Measures <ul style="list-style-type: none"> Disclose ESG information through annual ESG report. Maintain a close relationship with major stakeholders to ensure timely response to their enquiry regarding the Group's ESG performance.

With a view to combating climate change and being resilient under different future climate scenarios, we have set the following environmental targets during the Reporting Period:

Our Green Targets

- GHG Emissions** To gradually minimize the air and GHG emissions though implementing emission control measure.
- Waste** To minimise our waste generation by adhering to the three-tier approach which prioritizes waste avoidance over waste reduction and recovery.
- Energy** To increase energy efficiency in the construction and operation stage and minimize energy loss during the generation process by implementing energy conservation measures and integrating sustainability consideration into the design of generation process and facilities.
- Water** To improve water efficiency by implementing water conservation measures and promote water saving in our operations.

ENERGY AND RESOURCE USAGE

With our mission of bringing low-carbon and clean energy to the world, the Group develops ESG strategy to continuously reduce our energy and resources usage. The main resource the Group uses when developing and operating photovoltaic power plants is electricity for office work and production and petrol for business vehicles. Water is mainly used for employees' usage and photovoltaic power plant development and construction.

The Group is dedicated to increasing energy efficiency in the construction and operation stage. In the selection process of solar module for our photovoltaic power plant, we prefer polysilicon to microcrystalline silicon as the former one is more energy efficient and occupies a smaller area for the same electricity generation performance. To minimize energy loss during the generation process, we have optimized the conductor surface gradients and the number of cables used in our photovoltaic power plant. Upon completion of the photovoltaic power plant, the station would self-sustain its need for electricity to reduce our reliance on electricity generated from the traditional fuel.



In terms of the water consumption, we continuously adopt various measures to enhance the efficiency in water consumption and promote water recycling in our operations. We pay special attention to water extraction for power plants locating at arid zone and prevent contaminating underground water to protect local water resources. All of our projects comply with the Class III standard of the Standard for Groundwater Quality (GB/T 14848-2017) (《地下水質量標準》). During the Reporting Period, we were not aware of any significant amount of wastewater generated from and any difficulties in sourcing water for our daily operation.

AIR EMISSIONS AND GREENHOUSE GASES

Dust and waste gases are our major direct emissions generated during the construction phase of photovoltaic power plants. A series of measures are adopted to meet the Class II standard of the Ambient Air Quality Standards (GB 3095-2012) (《環境空氣質量標準》), including:

- Careful planning to prevent excavating during windy days;
- Fence installation to minimize the spreading distance of dust;
- Frequent water sprinkling for dust suppression;
- Car wheels and body wash for dust removal;
- Speed limit for vehicles entering the construction site to minimize the production of dust; and
- Timely earthwork backfilling to minimize the opportunity for dust spreading.

During the operating phase of photovoltaic power plant, the only direct emission would be sourced from the consumption of unleaded petrol by the vehicles owned by the Group. We have replaced coal-powered heaters with electric heaters to minimize our carbon footprint.

With regard to the greenhouse gases generated from the electricity the Group purchased, we constantly reduce emissions from the source, explore and equip with more energy efficient facilities. Besides, we will keep seeking potential opportunities for photovoltaic power plant development to maintain negative carbon emissions and offset our greenhouse gas emissions.

WASTE MANAGEMENT

General solid waste and a small portion of hazardous waste might be generated during our business operations. For effective waste management, the Group has established comprehensive guidelines on handling waste generated from our operations. We adhere to the three-tier approach which prioritizes waste avoidance over waste reduction and recovery. Recognizing that construction waste from our construction work and domestic waste produced by our employees are the major waste sources of the Group, we aim to go beyond compliance and ensure effective waste management practices are in place.



The Group is dedicated to achieving source reduction towards general solid waste management. Besides sorting recyclable construction and domestic waste, photovoltaic modules in our photovoltaic power plant which have reached their expected life would be collected by qualified third-party units for recycling. For non-recyclable solid waste, they are collected by environmental protection authority for proper central treatment to prevent contamination.

Due to the business nature, the hazardous waste generated by the Group in 2020 and 2021 were insignificant. During power station maintenance, it may involve an insignificant amount of discarded mineral oil from our photovoltaic power plant transformers. Despite the generation of hazardous waste is minimal, all the hazardous waste would be collected and treated by the operation and maintenance service contractor. Monitoring report would be sent to the Group to ensure the disposal process is strictly complied with the respective requirements outlined in the approved environmental impact assessments as well as relevant national legislation and standards such as the Law of the People's Republic of China on the Prevention and Control of Environmental Pollution by Solid Waste (《中華人民共和國固體廢物污染環境防治法》) and the Management Measures for Hazardous Wastes Movement (《危險廢物轉移聯單管理辦法》) and the Standard for Pollution Control on Hazardous Waste Storage (GB 18597-2001) (《危險廢物貯存污染控制標準》).

NOISE MANAGEMENT

During different phases of the photovoltaic power plant development, different levels of noise would be generated. With cautious site location selection, the Group complies with the Class II standard of the Environmental Quality Standard for Noise (GB 3096-2008) (《聲環境質量標準》), the Class II standard of the Emission Standard for Industrial Enterprises Noise at Boundary (GB12348-2008) (《工業企業廠界環境噪聲排放標準》) and Emission Standard of Environment Noise for Boundary of Construction Site (GB 12523-2011) (《建築施工場界環境噪聲排放標準》) to mitigate noise pollution. We replaced noise-intensive pneumatic machinery with hydraulic machinery, which produces much lower level of noise. Moreover, sound barriers are also installed at the construction site to further reduce the noise produced during construction.

ECOLOGICAL PROTECTION

With years of experience in photovoltaic power plant development, construction, operation and maintenance, the Group has established an effective approach to manage the ecological impact caused by the construction of photovoltaic power plant, such as soil erosion, influence on local biodiversity and change in landscape. With the aid of professional personnel, we review, check and improve the plan to ensure compliance with relevant standards and regulations for environmental protection and restoration.

Soil Erosion

The Group requires timely backfilling and flattening of excavated hole to prevent further erosion during construction. To restore the natural soil protection, we actively cover the land with plantation to reduce erosion in soil due to raining.

Biodiversity

Before the commencement of the project, the Group would conduct a detailed ecological study to identify and analyse the biodiversity risk of photovoltaic power plants and surrounding habitats, aiming to mitigate and avert the impacts of solar power projects on plants and animals, as well as their habitats.

Landscape Impact

During project location selection process, the Group takes the features of the surrounding landscape and opinions of local community into consideration. We strive to ensure our photovoltaic power plant can promote a harmonious coexistence between industry and the local environment.



ENVIRONMENTAL PERFORMANCE SUMMARY



KPIs ^{3,4,5,6,7,8,9,10,11,12}	2021	2020	Unit
Greenhouse Gas ("GHG") Emissions			
Total GHG Emissions	3,494.74	6,549.24	Tonnes CO ₂ e
Direct Emissions (Scope 1)	1.02	8.49	Tonnes CO ₂ e
Indirect Emissions (Scope 2)	3,493.71	6,540.75	Tonnes CO ₂ e
Intensity of Total GHG Emissions (Scope 1 and 2)	0.004	0.006	Tonnes CO ₂ e/MWh
Air Emission			
Nitrogen Oxides (NO _x)	0.24	2.17	Kg
Sulphur Oxides (SO _x)	0.01	0.05	Kg
Particular Matters (PM)	0.02	0.16	Kg
Energy			
Total Energy Consumption	5,729.96	10,749.85	MWh
Purchased Electricity	5,726.46	10,720.79	MWh
Unleaded Petrol	3.51	29.06	MWh
Energy Consumption Intensity	0.007	0.009	MWh/MWh
Waste			
Total Non-hazardous Waste Generated	2.61	-	Tonnes
Total Non-hazardous Waste Generated Intensity	0.003	-	Kg/MWh
Water			
Total Water consumption	1,928.00	5,558.00	m ³
Water Consumption Intensity	0.002	0.005	m ³ /MWh

³ Certain number of centralised photovoltaic power plants and household distributed photovoltaic power plants ceased the operation during the Reporting Period, so the environmental performance data for the two years cannot be directly compared.

⁴ With reference to the national emission factors for Mainland China newly supplemented in the "How to prepare an ESG report" published by HKEX, the total GHG emissions (including scope 2 indirect emissions and total GHG emissions intensity) in 2020 have been restated.

⁵ Our intensity factor is the amount of green electricity generated by photovoltaic power plants (MWh).

⁶ We started to disclose the relevant figures of non-hazardous waste and water consumption during the Reporting Period to provide a better picture of the Group's environmental performance.

⁷ Non-hazardous waste generated is confined to the domestic waste produced in our office in Wuxi City, the PRC. Considering the materiality principle, the amount of non-hazardous waste generated in power stations is considered as immaterial. We will continue to measure on such aspect and make relevant disclosures in the Report when significant non-hazardous waste is involved.

⁸ Water consumption is confined to that of in our office in Wuxi City, the PRC, while water supply in power stations was controlled by the operation and maintenance service contractor which was considered the provision of data for water consumption was not feasible. Hence, the relevant data is not available.

⁹ Our reporting on air and greenhouse gases (GHG) emissions are mainly based on the requirements in "How to prepare an ESG report" published by HKEX and "GHG Protocol Corporate Accounting and Reporting Standard (revised edition)" published by the World Business Council for Sustainable Development (WBCSD) and World Resources Institute (WRI). Operational control approach is adopted when defining organizational boundary for the purpose of GHG accounting and reporting.

GHG emissions is presented in tonnes of carbon dioxide equivalent (CO₂e). Our scope 1 direct emissions cover GHG emissions directly produced by businesses owned or controlled by the Group, while scope 2 indirect emissions cover GHG emissions of indirect energy resulted from electricity (purchased or acquired) internally consumed by the Group.

Our total energy consumption includes purchased electricity and non-renewable fuels consumed and the relevant conversion factors reference from "Technical Note: Conversion of fuel data to MWh" published by CDP.

¹⁰ The purchased electricity data in 2020 has been adjusted to reflect the actual situation, and the indirect GHG emissions (Scope 2) and energy data have been revised accordingly.

¹¹ Intensity figures are rounded to three decimal places while other environmental figures are rounded to two decimal places.

¹² Totals may not be the exact sum of numbers shown here due to rounding.

*Cultivating a decent
people-centric workplace*

**Goal: To cultivate a corporate culture that
embraces talent development, employee
wellbeing and family-friendly practices**

Selected SDGs:



TALENT MANAGEMENT



Following a people-first principle, the Group always regards employees as an important source of sustainable development. We aim to create a people-oriented working environment by embracing diversity and prioritizing wellness and safety. We are determined to provide rewarding career paths so as to develop a diverse and industry-leading team.

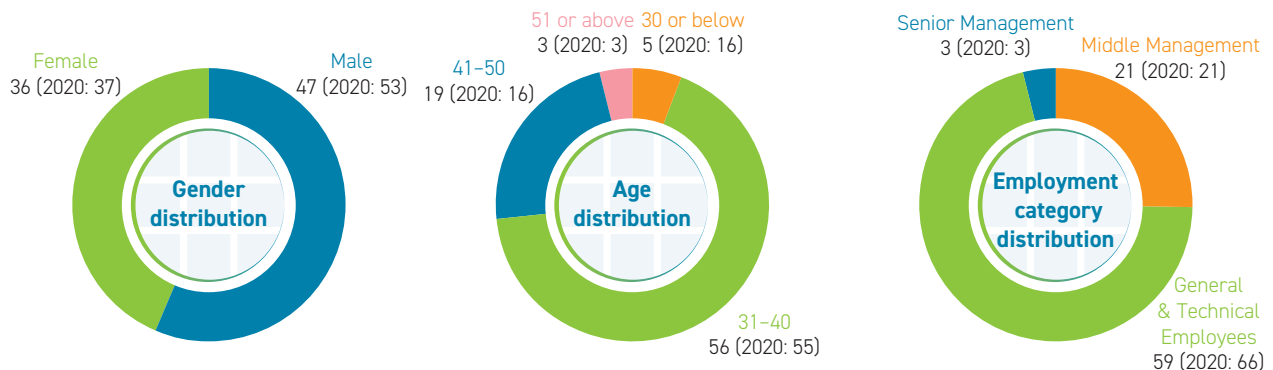
FAIR EMPLOYMENT

As employees are the crucial elements of the Group's competitiveness and development, we strive to build our pool of talent by offering satisfactory and competitive remunerations and welfares and a harmonious and safe working atmosphere. We adhere to the talent management concept of "people-oriented", and complies with applicable laws and regulations, including the Labour Law of the People's Republic of China (《中華人民共和國勞動法》), the Labour Contract Law of the People's Republic of China (《中華人民共和國勞動合同法》), the Occupational Disease Prevention Law of the People's Republic of China (《中華人民共和國職業病防治法》), and the Provisions on the Prohibition of Using Child Labour (《禁止使用童工規定》). During the Reporting Period, the Group was not aware of any material non-compliance with the relevant laws and regulations relating to employment, occupational health and safety as well as labour standards.

LABOUR PRACTICE

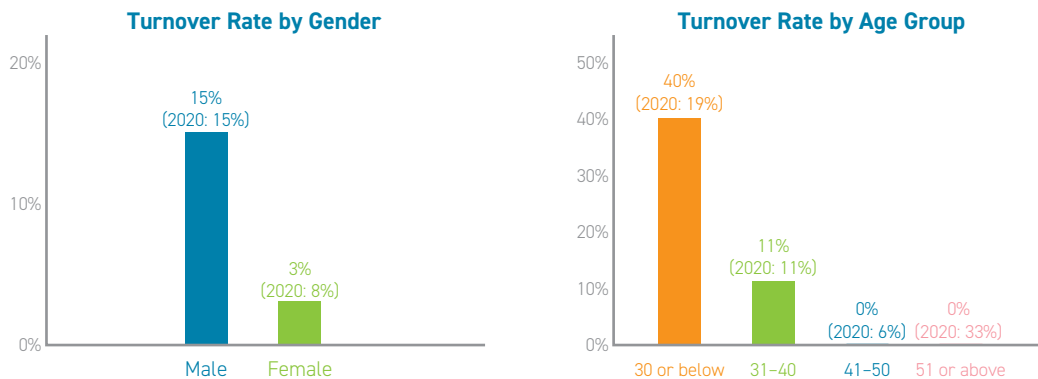
The Group is committed to embracing diversity and upholding equal opportunities during the recruitment process and attract talents through multiple channels including internal promotion, campus recruitment, recruitment fair etc. As an advocate for equal opportunities, the Group appoints people by merit, and age, gender, race, colour, sexual orientation, religion, nationality, disability, or marital status of the applicants would be excluded in our recruitment process. Any non-compliance with the Code of Conduct among employees are subject to disciplinary action, which may include dismissal according to statutory requirements where appropriate.

As of 31 December 2021, the solar power generation segment in the PRC employed 83 full-time employees (2020: 90 full-time employees), all of whom are located in the PRC.





For employee turnover, the Group actively conducts an exit interview and takes appropriate measures to respond to feedback collected. During the Reporting Period, the Group's total employee turnover rate was 10% (2020: 12%), all of them are located in the PRC.



As an ethical corporate, we have "zero tolerance" for all forms of forced labour and the use of child labour. Staff recruitment and management are subject to internal supervision to ensure that both internal and legal requirements are met. We recognize the significance of work-life balance of our staff, and do not encourage our staff to work overtime. We have clearly stipulated that all overtime work requires prior approval, and employees who work overtime would be offered compensation leave equivalent to the number of days of the overtime work, to ensure they have sufficient rest time. Moreover, we have set up a whistleblowing channel for internal and external stakeholders to report on any misconduct regarding the Group's labour practice. During the Reporting Period, we were not aware of any material violations of laws and regulations related to the prohibition of the use of child labour or forced labour.

REMUNERATION AND WELFARE

The Group places high value on our employees as we believe they are the key drivers of sustainable business development. Therefore, we endeavour to provide all our staff with comprehensive benefits and protections, and review and update our policies of salary and benefit regularly. We strictly adhere to the Labour Law of the People's Republic of China and the Labour Contract Law of the People's Republic of China to provide our staff with pension insurance, medical insurance, unemployment insurance, maternity insurance, work injury insurance and housing provident fund ("five insurances and one housing fund"). All employees are treated equally in job transfer and promotion. Assessment criteria are clearly stated in relevant policies to ensure openness and transparency.

The salaries of the Group's employees mainly comprised of basic salary, performance salary, overtime-working pay, and subsidies. In addition, bonuses are offered to employees based on department performance and individual performance to effectively incentivize our employees. On the basis of ensuring the legality, compliance, fairness and equality of the employee compensations, we also provide annual bodychecking service and customized commercial insurance to our employees.

Our employees are encouraged to maintain a work-life balance. We held a floral arranging activity in celebration of March 8th international woman's day to express our caring to female employees and enhancing their confidence. We also organised different sport competition to enhance employees' sense of belonging. Besides, the Company's union has formed a football team for employees to play and practice in their spare time. From time to time, friendly matches with our corporate partner would be organized. In addition, gifts and subsidies are distributed to employees during festivals to share the festive joy with them.

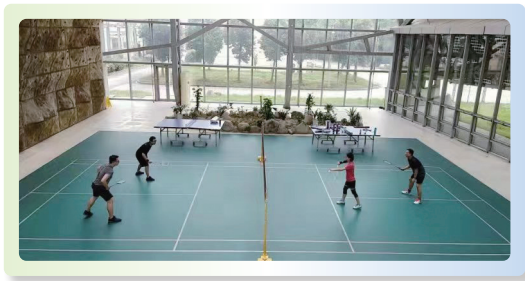


Employee activities highlights

Floral Arranging Activities



Badminton Match



TRAINING AND DEVELOPMENT

Various learning channels have been provided for our employees, including training programmes, apprenticeship, online platform and self-learning channels. To make the most of what they have learnt from these programs, we will build a comprehensive training system and develop an annual development plans at the beginning of each year for our employees that aim at fostering professional ethics, skills, experience and performance.

Our training system relies on the cooperation of various departments to accomplish our goal to nurture our talent. The Human Resources Department determines the training direction of the year and develops the annual development plans by collecting and organizing feedback from the senior management and employees. Other functional departments are responsible for executing the development plan and evaluating the effectiveness of the training program to further improve the training quality.



Internal training includes theoretical and hands-on training, which cover work-related technical, safety and integrity content to ensure employees familiarize themselves with their business responsibilities and meet the requirement of relevant jobs. On top of that, to ensure employees would grow with the Group, we offer training on various aspects such as leadership, IT skills, financing skills, legal skills and team management for personal development. The Group also provides funding and encourages employees to seek external training opportunities to fully meet their needs in the improvement of professional knowledge, vocational skills, and academic qualifications. During the Reporting Period, a total of 308 hours of training were provided for our employees.

Statistics on Employee Training and development ¹³	2021	2020
Total training hours	308	291
Average training hours of employees	3.7	3.2
Percentage of employees trained	88%	96%

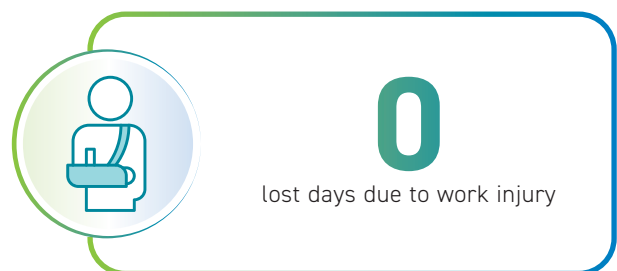
Training Hours Per Employee and Percentage of Employees Trained By Gender ¹³		
Male	4.2 (55%)	3.1 (58%)
Female	3.1 (45%)	3.4 (42%)

Training Hours Per Employee and Percentage of Employees Trained By Employee Categories ¹³		
Senior management	-	-
Middle-level management	3.9 (30%)	3.7 (28%)
General and technical staff	3.8 (70%)	3.2 (72%)

¹³ Training hours per employee for each category is calculated using the total training hours for employees in the specified category divided by the total number of employees in the specified category as of 31 December 2021. Training percentage per employee for each category is calculated using the total number of employees trained in the specified category divided by the total number of employees in the specified category as of 31 December 2021.

HEALTH AND SAFETY

Safety and well-being of employees are of utmost importance to us. To this end, the Group has implemented a Safety Agreement (《安全協議書》) with the contractor for all of our operating projects to set out our expectation on the safety standard. The Safety Agreement listed out various requirements regarding different areas, including the qualifications of workers specialized in installing electrical parts and welding, inspection of construction equipment, working environment, vehicles and public facilities. To ensure that the operation and maintenance team fully understand the requirement, we require our contractor to organize monthly safety meetings and weekly safety learning sessions.



¹⁴ Included the past three years with the reporting year covered.



To safeguard employees' safety, we have formulated emergency plans in the Safety Agreement, covering public security accidents, fire accidents and poisoning accidents to enable employees to take prompt actions to respond to emergencies. As some of our power plants locate in Xinjiang Uygur Autonomous Region, with the rising terrorism risk, we have formulated an emergency plan regarding potential terrorist attacks to safeguard the safety of our employees. Moreover, based on the idea of "prevention as priority combined with fire control", we formulated Annual Fire Drill Working Plan (《年度消防演練工作計劃》) which clearly set out the responsibilities of different roles and positions in respect of fire prevention, and conduct regular fire drills to fully ensure the safety of our staff.

Joint Anti-terrorism and Anti-riot Drill



Prevention of the spread of COVID-19

During the outbreak of pandemic, our employees' health and safety remain our utmost priorities. We strictly abide by the prevention measures set out by the government and the World Health Organization. On top of that, we distributed face masks and other prevention materials to ensure our staff had sufficient protection. We also implemented flexible working locations policy such as working from home to safeguard our employees from the threat. To prevent the spread of the virus, body temperature screening has been in place in each station for better control.

*Nurturing wellbeing in our
community*

Goal: To proactively engage in community investment to give back to society

Selected SDGs:



COMMUNITY CARE



As a global corporate citizen, the Group embraces its social responsibility to give back to community. We strongly motivate our employees to engage in various charitable activities. We strive to nurture a culture of social responsibility among our employees.

POVERTY ALLEVIATION

The Group contributed our technical expertise to design projects that endeavour to mitigate poverty, supporting the state's vision to create a moderately prosperous society in all respects, as set out in the 14th Five-Year Plan. With the help of government subsidies and donations from the Group, we have installed dispersed solar power plants in rural areas and are committed to long-term product quality and assistance. By selling excess electricity to power grids, the power plants not only provide electricity to rural villages, but also provide additional income.

During the reporting period, we distributed COVID-19 prevention guidelines to our staff and implemented infection control measures by following government's recommendation in order to alleviate medical burden of the community.

We have significantly reduced the size of the charitable programs to maintain social distancing, protect the health and safety of our employees and local communities and reduce the risk of spreading virus. Upon the end of the pandemic, we will consider resuming the programs.

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順風國際清潔能源有限公司
SHUNFENG INTERNATIONAL CLEAN ENERGY LIMITED

