

## 順風國際清潔能源有限公司





## **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 approach, strategy and performance.

#### REPORTING PERIOD AND SCOPE

Unless otherwise stated, the Report mainly focuses on our segment of solar power generation in the People's Republic of China (the "**PRC**" or "**China**") from 1 January 2023 to 31 December 2023 (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 (the "ESG Reporting Guide") set out in Appendix C2 to the Rules Governing the Listing of Securities on The Stock Exchange of Hong Kong Limited (the "Listing Rules") issued by The Stock Exchange of Hong Kong 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 reporting principles, namely materiality, quantitative, balance and consistency, as outlined in the ESG Reporting Guide. Our application of these reporting principles is outlined below.

Principle	Definition	The Group's Application
Materiality	The ESG issues covered in this Report should be sufficiently important to investors and other stakeholders.	The Group identifies the ESG topics that are material to our business operations and our key stakeholders through ongoing engagement with stakeholders and regular assessment of the materiality of ESG topics. For details of the assessment processes and results, please refer to the sections headed "Engaging with our Stakeholders" and "Identifying ESG Topics that Matter".
Quantitative	This ESG Report should disclose key performance indicators ("KPIs") in a way that is measurable. Comparative data should be provided where appropriate.	As far as practicable, the Group discloses its environmental and social KPIs collected from relevant departments in quantitative form, as well as provides historical data of KPIs to facilitate comparability over time and a narrative explaining the purpose and impacts.
Balance	This ESG Report should present an unbiased picture of the Group's sustainability performance, avoiding selections, omissions, or presentation formats that may inappropriately influence readers' decisions or judgments.	The Group has objectively presented the current situation and performance of the Group's sustainability management, which include the achievements it has made and the challenges it faces.
Consistency	The Group should employ consistent methodologies in this ESG Report to facilitate meaningful comparisons of ESG data over time.	Unless otherwise specified, the reporting scope and reporting methodology are 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 of the Company (the "Board") on 23 April 2024.

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

## About the Group

The Group engages in one segment of solar power generation in the PRC during the Reporting Period. We continue to proactively explore various kinds of clean energy resources with an aim to lay a solid foundation for its development into a global leading supplier which provides low-carbon and energy-saving integrated solutions.

#### **OUR OPERATING LOCATIONS**

The Group has laid out its solar power plants mainly in Shandong, Xinjiang, Jiangsu, Zhejiang, Hunan, Tibet and Qinghai in the PRC.



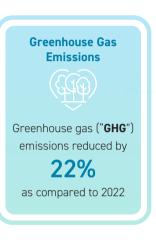
#### **2023 SUSTAINABILITY HIGHLIGHTS**

#### **Environmental**<sup>1</sup>









#### **SOCIAL**



<sup>&</sup>lt;sup>1</sup> The calculation basis of reduced emissions and energy saving is sourced from China Electricity Industry Development Report 2023 issued by the China Electricity Council.

## SFCE's Approach to Sustainability

#### **OUR SUSTAINABILITY STRATEGY**

Driven by our corporate mission of creating a low-carbon environment, our approach to sustainability is built upon four key strategic pillars: (i) Low Carbon Solutions, (ii) Green Operation, (iii) Talent Management, and (iv) Community Care. By focusing on our sustainability strategic pillars, we aim to drive sustainability in the wider community and cultivate long-term relationships with customers, shareholders, employees, and suppliers.

## ALIGNING WITH THE UNITED NATIONS SUSTAINABLE DEVELOPMENT GOALS ("UNSDGs")

To address the world's pressing sustainability issues, we are committed to supporting the UNSDGs, which act as a universal call to action to end poverty, protect the planet, and ensure peace and prosperity. Focusing on the 8 UNSDGs most significant to our business, we have aligned our sustainability strategic pillars with the UNSDGs and established specific goals to reinforce our contribution towards our chosen UNSDGs.

Low Carbon Solutions Delivering high-quality clean energy for a greener and cleaner future

#### Goal:

To leverage our high-quality low carbon solutions to create a sustainable future through ethical practices, supply chain management and project quality management.









#### Our Actions:

- Delivering one-stop-shop clean energy solution
- · Implementing project quality management measures at various stages
- · Adopting sustainable supply chain management
- Establishing anti-corruption policies and whistle-blowing mechanisms

Green Operation Pursuing a sustainable and climate-resilient operation to protect our planet

#### Goal\*:

 $\label{thm:continuous} To \ reduce \ our \ environmental \ footprint \ and \ enhance \ climate \ resilience \ through \ climate \ action.$ 





#### Our Actions:

- · Conducting climate-risk assessment and management
- Evaluating and minimising the environmental impacts of our projects
- Adopting green office and green procurement practices
- \* For our green targets, please refer to the section headed "Our Green Targets" of the Report.

Talent Management Cultivating a decent people-centric workplace

#### Goal:

To cultivate a corporate culture that embraces talent development, employee wellbeing, health and safety and family-friendly practices.





#### Our Actions:

- Providing competitive remuneration packages and benefits to employees
- Monitoring the health and safety of our working environment
- Providing training and development opportunities to employees
- Protecting human rights and preventing the use of child or forced labour

**Community Care** 

Nurturing wellbeing in our community

Goal:

To proactively engage in community investment to give back to society.

#### Our Actions:

Contributing to the community through social activities and donations



#### SOUND SUSTAINABILITY GOVERNANCE

With our sustainability governance structure, we aim to ensure the alignment of strategic objectives with sustainability values.

The Board has the overall responsibility for the ESG strategies and oversight of the ESG issues of the Group. Delegated by the Board, our senior management is responsible for developing and implementing the ESG strategy 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;
- Identifying and monitoring the material ESG-related risks and opportunities (including but not limited to climate-related risks and environmental and social risks along the supply chain) to prevent and mitigate the related risks:
- $\cdot$  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 reports to reflect the sustainability performance for the Board's approval.

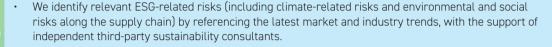
#### **Sustainability Governance Structure**



#### **ESG RISK ASSESSMENT AND MANAGEMENT**

To ensure resilience in the dynamic business environment, we have implemented our ESG risk management mechanism to identify, evaluate and mitigate potential ESG-related risks. The senior management is responsible for managing and monitoring the Group's risk management activities, while the Board retains ultimate oversight responsibility. The details of our ESG-related risk management process are as follows:

dentification



Evaluation

2

• We assess the potential impacts and likelihood of the relevant ESG-related risks.

measures and provides relevant suggestions as necessary.

Prioritisation

• We prioritise material ESG-related risks by assessing their risk levels in terms of potential impact and likelihood of occurrence.

3

• We manage and monitor the identified risks, establish corresponding mitigation measures and report the results of the risk assessment annually for discussion with the Board.

As part of its oversight responsibility, the Board conducts regular reviews of the effectiveness of control

Mitigation

" |

#### **ENGAGING WITH OUR STAKEHOLDERS**

To ensure long-term business development, it is important for us to consider the perspectives of various stakeholders who have a direct interest in SFCE. We maintain communication with customers, employees, investors and shareholders, business partners (including research and development institutions), suppliers, government authorities, and local communities through various engagement channels, which are set forth below.

Stakeholder Types	Channels	Frequency	Matters of Concern	The Group's Responses
Customers	<ul><li>Business communication</li><li>Meetings</li><li>Customer service hotline</li></ul>	On-going (day-to-day communication)	Service quality     Privacy     Honest contract     performance	Improving service quality     Improving data security
Employees	<ul> <li>Internal communication system</li> <li>Meetings</li> <li>Annual appraisal</li> <li>Company activities</li> <li>Social media</li> </ul>	<ul> <li>Annually (performance appraisal)</li> <li>On-going (day-to-day communication)</li> </ul>	Sound welfare     Good career     development     Comfortable working     environment	<ul> <li>Offering various         employee activities</li> <li>Providing diversified         training</li> </ul>
Investors and shareholders	<ul> <li>Shareholders' meetings</li> <li>Annual reports, financial statements, and announcements</li> <li>Corporate websites</li> <li>Social media</li> </ul>	Annually (General Meeting)     When necessary (for other meetings)	<ul> <li>Good business performance</li> <li>Good corporate governance</li> <li>Risk control and integrity</li> <li>The Company's strategic direction</li> <li>Sufficient disclosure</li> </ul>	Strengthening ESG governance     Developing and refining ESG strategy to meet investors' expectations     Factual and sufficient disclosure
Business Partners <sup>2</sup>	<ul> <li>Daily communication between business representatives</li> <li>On-site visits</li> <li>Industry exhibitions</li> </ul>	Periodically	<ul> <li>Mutual benefits</li> <li>Promotion and innovation of management</li> </ul>	Maintaining effective communication
Suppliers	<ul><li>Business communication</li><li>Meetings</li></ul>	Periodically	<ul> <li>Win-win cooperation</li> <li>Honest contract performance</li> </ul>	<ul> <li>Increasing investment in supplier management</li> <li>Building an open and transparent supply chain</li> </ul>
Government Authorities	<ul><li>Information submission</li><li>Interviews</li><li>Public consultation</li></ul>	Periodically	Operating in compliance	Ensuring compliance     with laws and     regulations

<sup>&</sup>lt;sup>2</sup> Including research and development institutions.

#### SFCE's Approach to Sustainability (Continued)

Stakeholder Types	Channels	Frequency	Matters of Concern	The Group's Responses
Local Community	<ul> <li>Charitable activities</li> <li>Social media</li> <li>Corporate websites</li> </ul>	• Periodically	Charity investment     Safety and     environmental     protection	<ul> <li>Boosting community investment</li> <li>Managing workplace health safety</li> <li>Preventing workplace injuries and illnesses</li> <li>Enhancing environmental and ecological protection</li> </ul>

#### **IDENTIFYING ESG TOPICS THAT MATTER**

The integrity of our sustainability strategy and management approach depends on our ability to identify the ESG topics that is material and important to our business. With our materiality assessment process, we ensure that ESG topics that are important to our business continuity and to stakeholders' interests are identified and addressed.

#### Step 1: Identification

With reference to the international and local ESG reporting frameworks and standards such as UNSDGs, the HKEx ESG Reporting Guide, industry megatrends, and peer benchmarking, we identified 26 ESG-related topics relevant to the Group's business.

#### Step 2: Prioritisation

We provided an online questionnaire for our major stakeholders and our management to collect their feedback and expectations in relation to our sustainability performance. All stakeholders ranked the importance of ESG-related topics and provided their views on our ESG performance and communication strategies. The results were consolidated into a materiality matrix, which included a list of material topics and their overall level of materiality.

#### Step 3: Validation

The materiality matrix was reviewed and approved by the Board to confirm and finalise the material ESG-related topics identified.

The matrix below illustrates the relative materiality of 26 ESG-related topics to stakeholders (y-axis) and the Group (x-axis). A total of 11 topics in the first tier of the matrix have been prioritised as the most material topics for us to address and report on in this Report.

### **Materiality Matrix**



Importance to stakeholders is determined by external stakeholders' rating of the ESG-related topics 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 the potential impact of the topics affecting our business continuity and development.

#### **List of Topics Considered**

Environmental Sustainability	Responsible Value Chain	Employee Wellness	Community Care
1. Air Emission	11. Supply Chain Environmental Risks	19. Employee Benefits	25. Community Charity and Contribution
Hazardous and     Non-Hazardous Waste     Management	12. Responsible Supply Chain	20. Equal Opportunities, Diversity and Anti-discrimination	26. Fostering Community Relationships
3. Greenhouse Gas Emission	13. Project Management	21. Occupational Health and Safety	
4. Energy Management	14. Customer Service and Complaint Handling	22. Hazard and Emergency Planning	
5. Water Resources  Management	15. Data Protection and Cybersecurity	23. Employee Development and Training	
6. Wastewater Emission and Management	16. Technological Innovation and Adoption	24. Employment Compliance	
7. Ecological Environment and Biodiversity	17. Intellectual Property		
8. Climate Change and Resilience	18. Anti-corruption		
Packaging Material     Consumption			
10. Green Procurement			

#### **List of Most Material Topic**

The results of the assessment help us to manage and address the material ESG topics of the Group, and better incorporate ESG principles into our business operation. A total of 11 most material topics identified and their corresponding sections in this Report are summarised in the following table:

Most M	Material Topics	Section in this Report	Page Number
4. En	nergy Management	Energy Consumption and GHG Emissions	21
8. Cli	imate Change and Resilience	Accelerating Climate Action	19-21
12. Re	esponsible Supply Chain	Building a Responsible Supply Chain	16
13. Pro	roject Management	Project Quality Management	15
18. An	nti-corruption	Ethical Operation	16-17
19. Em	nployee Benefits	Remuneration and Welfare	28
	qual Opportunities, Diversity and hti-discrimination	Labour Rights Protection	28
21. Oc	ccupational Health and Safety	Health and Safety	29-30
23. Em	nployee Development and Training	Training and Development	29
24. Em	nployment Compliance	Talent Management Significant Laws and Regulations	25-30 33
25. Co	ommunity Charity and Contribution	Community Care	31-32



Delivering high-quality clean energy for a greener and cleaner future

Goal: To leverage our high-quality low carbon solutions to create a sustainable future through ethical practices, supply chain management and project quality management.

UNSDGs addressed in this chapter:











Responsible Supply Chain Project Management Anti-corruption

## Low Carbon Solutions

As a clean energy provider, we strive to provide high-quality low carbon solutions to our customers. We are committed to continually enhancing the quality of our solar power generation business, as well as enhancing sustainability through our operation and supply chain management. We strictly abide by all applicable laws and regulations relating to product responsibility and anti-corruption3. During the Reporting Period, we were not aware of any material non-compliance with laws and regulations relating to health and safety, advertising, labelling and privacy matters relating to products and services, or any material non-compliance with laws and regulations relating to bribery, extortion, fraud and money laundering.

#### SFCE'S BUSINESS MODEL

Following our mission of "creating a low-carbon environment", the Group is devoted to exploring, developing, and managing various types 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 ("O&M") stage. We offer an array of photovoltaic clean energy solutions that fulfil the demands of different users. Our centralised solar power plants are large-scale power plants that connect with the national power grid while our distributed solar power plants provide small-scale solutions to domestic and industrial users to address their needs for self-consumption. As of 31 December 2023, the Group owned 7 centralised solar power plants and 11 distributed solar power plants.



Please refer to the "Significant Laws and Regulations" section of the Report for the list of relevant laws and regulations that are significant to the Group's business operations.

#### PROJECT QUALITY MANAGEMENT

To ensure the quality of our solar power business, we have established relevant policies and procedures in each stage of our projects:

Project Development

We have developed the Project Internal Initiation, Investment Initiation and Construction Management Measure that stipulates a clear framework of the approval and review process for project development plan, construction drawings, and other professional technical plans.

Daily Operations

Our Solar Power Plant Operation and Maintenance Manual and Operation and Maintenance Management stipulate standardised procedures for managing the daily operations of our projects as well as implementing emergency response measures. We continue to improve our quality management system to provide high-quality products and services to our clients.

After-sales Services

We are dedicated to improving our after-sales service by maintaining various communication channels such as hotlines and emails to collect customers' feedback on our product and service quality. To secure customers' experience, any complaints received shall be handled within the prescribed term by responsible employees adhering to internal procedures.

During the Reporting Period, we were not aware of any reported customer complaints regarding material defects in the quality of our solar power plants.

#### **BUILDING A RESPONSIBLE SUPPLY CHAIN**

We continually engage with a wide range of suppliers, including raw material providers, module manufacturers, and contractors. To ensure the quality and sustainability of our suppliers, we have in place the Tendering and Price Comparison Management Regulations and Supplier Management Regulations, which set out our supplier selection, management, assessment and monitoring process and criteria:

1. Supplier Selection

- Through site visits and assessments, potential suppliers are evaluated on multiple aspects, including but not limited to:
  - Business size
  - Track record
  - Qualifications
  - Certifications, such as the ISO 9001 Quality Management System certification, OHSAS 18001 Occupational Health and Safety Management system certification and the ISO 14001 Environmental Management System certification
- We also prioritise suppliers with lower environmental and social risks
- Only qualified suppliers will be included into our approved suppliers list
- 2. Ensuring Supplier Sustainability
- Suppliers are encouraged to adopt sustainable practices, such as prioritising local procurement to reduce carbon footprint of transportation, using fewer packaging materials to reduce unnecessary waste, and prioritising the use of energy-efficient equipment to promote efficient use of resources
- 3. Annual Evaluation and Control
- We conduct regular monitoring of supplier performance to ensure compliance with our internal standards and applicable laws and regulations
- Suppliers who fail to meet our expectations or breach relevant laws and regulations may be downgraded or removed from our approved supplier

During the Reporting Period, we had 54 major suppliers in the PRC. We implemented the above practices relating to engaging suppliers to all major suppliers.

#### **ETHICAL OPERATIONS**

At SFCE, we are committed to upholding the highest ethical standards and prohibiting all forms of bribery, extortion, fraud and money laundering. Our requirements on business ethics and integrity are clearly outlined in our Corruption, Bribery and Fraud Management Policy, Employee Handbook and other anti-corruption policies. Our employees are also required to acknowledge and sign a Declaration of Commitment to Integrity.

We encourage our employees to raise concerns about any potential misconduct through our grievance mechanism:



The Group is dedicated to nurturing a culture of integrity among our management and employees. To raise awareness of improper activities within the Group, regular anti-corruption training is organised annually to promote ethical business practices. Furthermore, all new joiners will receive orientation training on ethical standards of the Group. During the Reporting Period, we distributed training materials on anti-corruption to directors and employees. We also invited professional to provide training sessions to our directors, covering topics such as latest legal requirements, bribery and corruption, etc.

During the Reporting Period, there were no concluded legal cases regarding corrupt practices brought against the Group or its employees.

#### **INTELLECTUAL PROPERTY RIGHTS**

The Group respects intellectual property rights and is committed to protecting the intellectual properties of the Group and other parties. We continually reinforce our efforts on patent applications to protect the Group's intellectual property rights. We will not utilize the intellectual properties of our clients without prior approval.

#### PROTECTION OF DATA AND CUSTOMER INFORMATION

To protect the rights and privacy of the Group and our customers, we ensure that the data and customer information we possess are safeguarded. Our Employee Handbook requires employees to handle data and information in a confidential manner, and any violation would lead to internal penalties. Important customer files and information are properly managed by the archive department of the Group to prevent loss or unauthorised access.



## Green Operation

In alignment with our corporate vision and sustainability strategy, we are committed to improving environmental sustainability of our operations. We ensure strict compliance with the laws, regulations and standards in relation to environmental protection<sup>4</sup>.

During the Reporting Period, we were not aware of any material non-compliance with the relevant laws and regulations relating to air and GHG emissions, discharges into water and land, and generation of hazardous and non-hazardous waste.

#### **ACCELERATING CLIMATE ACTION**

The Group understands that climate-related risks could pose a serious threat to human well-being and societal development. Apart from contributing to climate actions through the delivery of low-carbon and clean energy, we have also assessed the climate-related risks of our operations and established corresponding mitigation measures. Our major climate-related risks and their corresponding mitigation measures are disclosed below with reference to the recommendations of the Task Force on Climate-related Financial Disclosures ("TCFD").

Please refer to the "Significant Laws and Regulations" section of the Report for the list of relevant environmental laws and regulations that are significant to the Group's business operations.

#### Climate-related Risk and Our Mitigation Measures

Potential Impacts to the	Group	Mitigation Measures
Physical Risk		
Acute Risk (extreme weather events such as typhoons and heavy rainfall)	<ul> <li>Increased maintenance cost for damage caused by extreme weather</li> <li>Employee safety issues caused by extreme weather</li> </ul>	<ul> <li>Perform regular check on the solar plants. Remote monitoring would be conducted via an online monitoring system for timely report on any abnormalities</li> <li>Promote effective and efficient operation of solar plants to offset the impact brought by extreme weather</li> <li>Provide safety training for employees to enhance their safety awareness and formulate contingency plan to ensure a timely response during emergency</li> </ul>
Chronic Risk (climate pattern changes, such as prolonged high temperatures)	Any unexpected changes in sunlight duration or temperature rise could lead to a potential decrease in energy production efficiency and capacity, affecting the Group's operational and sales performance	<ul> <li>The Plant Maintenance Department is responsible for performing regular inspections on the PV power plants. The Group has launched online monitoring systems to carry out remote monitoring of PV panel status to ensure timely report on any abnormalities</li> </ul>
Transition Risk		
Policy and Legal Risk	<ul> <li>Changes in government subsidies on renewable energy projects could potentially increase operation cost</li> <li>Changes in climate-related government policies and regulatory requirements could potentially increase the Group's compliance costs</li> </ul>	<ul> <li>Monitor the emerging markets and regulatory trends and ensure the Group's emission meet the legal requirement</li> </ul>
Reputation Risk	Failure to meet the social expectation on the Group's ESG performance may negatively affect our reputation and result in loss of potential customers	<ul> <li>Disclose ESG information through annual ESG report</li> <li>Maintain a close relationship with major stakeholders to ensure timely response to their enquiry regarding the Group's ESG performance</li> </ul>

To enhance and monitor our performance in environmental protection and climate mitigation, we have established the following green targets.

#### **Our Green Targets**

	Target	Progress in 2023
GHG Emissions	To reduce GHG emissions through implementing emission control measures.	Achieved
Waste	To reduce our waste generation by adhering to the three-tier approach which prioritises waste avoidance over waste reduction and recovery.	In Progress
Energy	To reduce energy consumption in the construction and operation stage and minimise energy loss during the generation process by implementing energy conservation measures and integrating sustainability considerations into the design of the generation process and facilities.	Achieved
Water	To reduce water consumption by implementing water conservation measures and promoting water saving in our operations.	In Progress

#### **Energy Consumption and GHG Emissions**

The operation of our solar power plants does not involve significant energy consumption and GHG emissions. Nevertheless, we have implemented a series of initiatives and green office measures to improve energy efficiency and reduce GHG emissions:

- Replacing coal-powered heaters with electricity-powered alternatives
- Placing reminders next to electrical appliances to raise the awareness of employees on energy conservation
- Switching off lights and electrical appliances when not in use

#### **Air Emissions**

Air emissions such as dusts are generated during the construction phase of our solar power plants. Also, particulate matter (PM), sulphur oxides (SO,), and nitrogen oxides (NO,) are generated from the fuel consumption by company vehicles. To minimise air emissions, a series of measures are adopted, including:

- Conducting careful planning to prevent excavating during windy days
- Installing fence to minimise the spreading distance of dust
- Conducting frequent water sprinkling for dust suppression
- Washing car wheels and body for dust removal
- Adopting speed limit for vehicles entering the construction site to minimise the production of dust
- Conducting timely earthwork backfilling to minimise the opportunity for dust spreading

#### Water Resources Management

The water consumption of the Group mainly comes from the domestic water use in offices and solar power plants, cleaning and irrigation in solar power plants, as well as project development and construction. As a responsible enterprise, we have adopted a wide range of measures to reduce water consumption and conserve water resources in our business operations, including but not limited to:

- Repairing water equipment in a timely manner when leaks are detected
- Using water equipment with higher efficiency
- Posting water conservation signs in the offices to enhance employees' awareness of water conservation
- Reusing treated water in solar power plant projects for irrigation

The operation of our solar power plants generates a small amount of wastewater from the cleaning of machineries and domestics water use. Wastewater generated by our operations are treated by sewage treatment plants, and we pay close attention to protecting local water resources by closely monitoring water extraction for power plants located in the arid zone and avoiding contamination of underground water.

There were no issues in sourcing water that was fit for purpose during the Reporting Period.

#### **Waste Management**

To minimise the generation of hazardous and non-hazardous waste, the Group has adopted a three-tier approach which prioritises waste avoidance over waste reduction and recovery, and has developed comprehensive guidelines on handling waste generated from our operations for effective waste management and to move towards a circular economy.

#### **Hazardous Waste**

The hazardous waste generated from our operations mainly comprises of a small amount of waste mineral oil from machinery maintenance. To ensure compliance with relevant national laws and regulations<sup>5</sup>, all hazardous waste is collected and treated by a qualified waste handler.

#### Non-hazardous Waste

The Group is devoted to minimising waste generation at source and ensuring effective general solid waste management. Besides sorting recyclable construction and domestic waste, photovoltaic modules in our solar power plants which have reached their expected life are collected by qualified third-party units for recycling. For non-recyclable solid waste, it is collected by the environmental protection authority for proper central treatment to prevent contamination.

To minimise office waste, we have adopted various green office measures, such as maximising the use of electronic means and reused paper to replace printing, as well as conducting recycling in office.

#### **Noise Management**

Noise is generated throughout different phases of the solar power plant development. To minimise the impact to the surrounding environment, we have adopted the following measures to minimise noise generation:

- Monitoring noise levels and conduct careful site selection before construction
- Replacing noise-intensive pneumatic machinery with hydraulic machinery, which produces lower level of noise
- Installing sound barriers at the construction site to further reduce the noise generated during the construction

#### **Ecology and Biodiversity Protection**

We ensure that the construction of our projects would not cause significant impact to soils, water environments, landscapes and biodiversity. To protect the environment and natural resources, we assess the potential ecological impact of our projects before construction and monitor our operations to ensure compliance with relevant standards and regulations<sup>5</sup>.

#### Soil Erosion

We adopt timely backfilling and flattening of excavated holes to prevent further soil erosion during construction phase. To restore the natural soil protection, we actively cover the land with plantations to reduce soil erosion caused by raining.

#### **Biodiversity**

Before the commencement of a project, the Group will conduct a detailed ecological study to identify and analyse the biodiversity risk of solar 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 the project location selection process, the Group takes the features of the surrounding landscape and the opinions of the local community into consideration. We strive to ensure our solar power plants can promote harmonious coexistence between industry and the local environment.

#### **Green Procurement**

To promote environmental sustainability throughout our procurement process, we prioritise the adoption of environmentally preferable products and services and green procurement practices, such as:

- Prioritising the use of environmentally-friendly office supplies and equipment, such as environmentally friendly paper and electrical appliances with energy efficiency labels
- Minimising the use of single-use products to reduce waste
- Minimising unnecessary purchase
- Prioritising local suppliers to minimise carbon emissions during transportation
- Please refer to the "Significant Laws and Regulations" section of the Report for the list of relevant environmental laws and regulations that are significant to the Group's business operations.

#### **Environmental Performance Summary**

KPIs 6,7,8,9,10,11	2023	2022	Unit
GHG Emissions			
Total GHG Emissions (Scope 1 and Scope 2)	2,942.94	3,773.03	Tonnes of CO <sub>2</sub> e
Direct Emissions (Scope 1)	34.89	25.16	Tonnes of CO <sub>2</sub> e
Indirect Emissions (Scope 2)	2,908.05	3,747.87	Tonnes of CO <sub>2</sub> e
Intensity of Total GHG Emissions (Scope 1 and 2)	0.01	0.009	Tonnes of CO <sub>2</sub> e/MWh
Air Emissions			
Nitrogen Oxides (NO <sub>x</sub> )	7.57	5.46	Kg
Sulphur Oxides (SO <sub>x</sub> )	0.19	0.14	Kg
Particular Matters (PM)	0.56	0.40	Kg
Energy			
Total Energy Consumption	4,885.97	6,229.17	MWh
Purchased Electricity	4,766.51	6,143.04	MWh
Unleaded Petrol	119.45	86.13	MWh
Energy Consumption Intensity	0.016	0.016	MWh/MWh
Waste <sup>12</sup>			
Total Non-hazardous Waste Generated	2.35	2.25	Tonnes
Total Non-hazardous Waste Generated Intensity	0.008	0.006	Kg/MWh
Water			
Total Water consumption	5,462.00	3,274.00	m <sup>3</sup>
Water Consumption Intensity	0.018	0.008	m³/MWh

- The amount of green electricity generated by solar power plants (MWh) is adopted as the intensity factor.
- 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.
- 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
- Our reporting on air and 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 and World Resources Institute. Operational control approach is adopted when defining organizational boundary for the purpose of GHG accounting and reporting.

GHG emissions is presented in carbon dioxide equivalent ( $CO_2$ e). 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 Intensity figures are rounded to three decimal places while other environmental figures are rounded to two decimal places.
- 11 Totals may not be the exact sum of numbers shown here due to rounding.
- 12 During the Reporting Period, the amount of hazardous waste generated were insignificant.



## TALENT MANAGEMENT

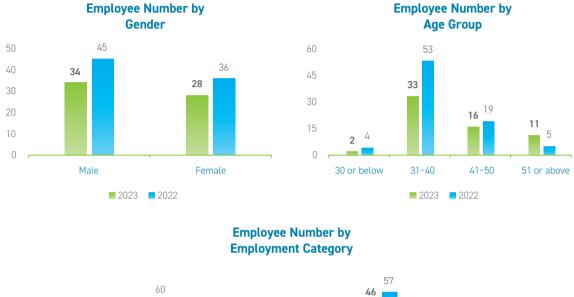
At SFCE, enhancing employee wellness is of utmost importance. We champion equity, diversity, and inclusion, and are committed to cultivating a diverse workforce and providing a safe and healthy working environment. The Group adheres to the applicable laws and regulations relating to employment, labour standards and health and safety<sup>13</sup>.

During the Reporting Period, the Group was not aware of any material non-compliance with the relevant laws and regulations relating to compensation and dismissal, recruitment and promotion, working hours, rest periods, equal opportunity, diversity, anti-discrimination, and other benefits and welfare, as well as laws and regulation relating to preventing child and forced labour. We were not aware of any material non-compliance with the relevant laws and regulations relating to providing a safe working environment and protecting employees from occupational hazards during the Reporting Period.

Please refer to the "Significant Laws and Regulations" section of the Report for the list of relevant laws and regulations that are significant to the Group's business operations.

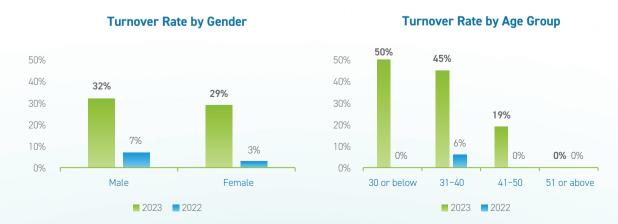
#### **WORKING AT SFCE**

As of 31 December 2023, the Group's solar power generation segment in the PRC has a total of 62 full-time employees (2022: 81 full-time employees), all of which are located in the PRC.





During the Reporting Period, the Group's total employee turnover rate was 31% (2022: 5%), with all employees who left the Group located in the PRC. We actively conduct exit interviews with resigned staff and takes appropriate measures to respond to feedback collected.



#### REMUNERATION AND WELFARE

We strive to provide competitive remuneration, benefits and welfare to employees. We encourage our employees to maintain a work-life balance through organising employee activities, such as festival celebrations, annual dinners, team building activities, etc.

Leaves and Rest Programmes	Statutory Social Benefits	Subsidies, Allowances and Caring Benefits	Celebrating Employee Excellence
<ul> <li>Paid annual leave</li> </ul>	Mandatory Provident	Discretionary	Contribution awards
<ul> <li>Maternity leave</li> </ul>	Fund	performance bonuses	
<ul> <li>Breastfeeding leave</li> </ul>	<ul> <li>Social security</li> </ul>	Overtime compensation	
<ul> <li>Parental leave</li> </ul>	contributions	<ul> <li>Training subsidies</li> </ul>	
<ul> <li>Paternity leave</li> </ul>		Body checks	
<ul> <li>Marriage leave</li> </ul>		Festival gifts	
<ul> <li>Family planning leave</li> </ul>		Meal allowance	
<ul> <li>Bereavement leave</li> </ul>			

#### LABOUR RIGHTS PROTECTION

We strive to ensure that the rights of all employees are protected. Our arrangements relating to compensation and dismissal, recruitment and promotion, working hours, rest periods, anti-discrimination, other benefits and welfare, etc., are clearly outlined in our Employee Handbook and other human resources policies. We prohibit all kinds of discrimination, including but not limited to, age, gender, race, colour, sexual orientation, religion, nationality, disability, or marital status. We ensure that diversity and inclusion is promoted in our recruitment, promotion, and dismissal processes, and treat employees in a fair manner when providing benefits, training opportunities and rewards. The Group proactively communicates with our employees through various channels, including internal communication systems, regular meetings and our grievance mechanism.

As an ethical corporate, we prohibit all forms of forced labour and child labour. Employee recruitment and management are subject to internal supervision to ensure that both internal and legal requirements are met. In cases where the employment of child labour is identified, we will promptly terminate the employee and escort them from the workplace. We will also initiate an investigation and report the incident to law enforcement authorities. To prevent forced labour, we ensure that our employees have sufficient rest time by clearly setting out arrangements related to working hours and rest periods in our human resources policies. We continually review our employment practices to ensure their effectiveness.

#### TRAINING AND DEVELOPMENT

The Group values the contribution of our employees to our business success and aims to facilitate their growth and development. We utilise various training channels, such as training programmes, apprenticeship, online platform, and self-learning channels, to enhance our employees' professional ethics, skills, experience, and performance. We continually provide orientation training, professional knowledge and skill training and management training to employees, covering topics such as environmental, health, and safety management, leadership, IT skills, financing skills, legal skills, and team management. The Group also offers funding to motivate employees to seek external training opportunities.

Our human resources department will determine the annual training plan with reference to feedback collected from the senior management and employees. The training plan and its effectiveness will be evaluated by other functional departments to further develop employees' expertise across different areas.

Training Hours and Percentage of Employees Trained 14,15,16	2023	2022
Total		
Total training hours	149	130
Average training hours per employee	1.8	1.6
Percentage of employees trained	67%	89%
By gender		
Male	2.1 (52%)	1.6 (58%)
Female	1.5 (48%)	1.6 (42%)
By employee categories		
Senior management	-	-
Middle-level management	1.4 (22%)	1.7 (28%)
General and technical employees	2.1 (78%)	1.7 (72%)

#### **HEALTH AND SAFETY**

At SFCE, we prioritise the provision and maintenance of a safe and healthy work environment. Our Safety Agreement sets out our expectations on safety standards for our contractors, including standards on the qualifications of workers specialised in installing electrical parts and welding, inspection of construction equipment, working environment, vehicles and public facilities management, etc. To monitor the implementation of safety measures and identify safety hazards, our safety personnel conduct regular safety inspections at our solar power plants, which covers hazards identification, spillage of chemicals, equipment maintenance and damage, etc. To ensure that the operation and maintenance team fully understand the requirement, our contractors are required to organise monthly safety meetings and weekly safety learning sessions.

Training hours per employee for each category are calculated using the total training hours of employees in that category divided by the total number of employees in that category as of 31 December 2023.

Training percentage per employee for each category is calculated using the total number of employees trained in that category divided by the total number of employees took part in training as of 31 December 2023.

The calculations of training data have included the relevant training data on those who left in the Group's core business, to present an accurate reflection of the training resources invested by the Group.

#### Talent Management (Continued)

To ensure that we react quickly and correctly in the event of safety hazards, we have in place emergency response plans that provide guidance for our employees to promptly respond to emergencies, such as public security accidents, fire accidents, and poisoning accidents. Annual Fire Drill Working Plan is also formulated, which clearly specifies the responsibilities of different roles and positions in respect of fire prevention.



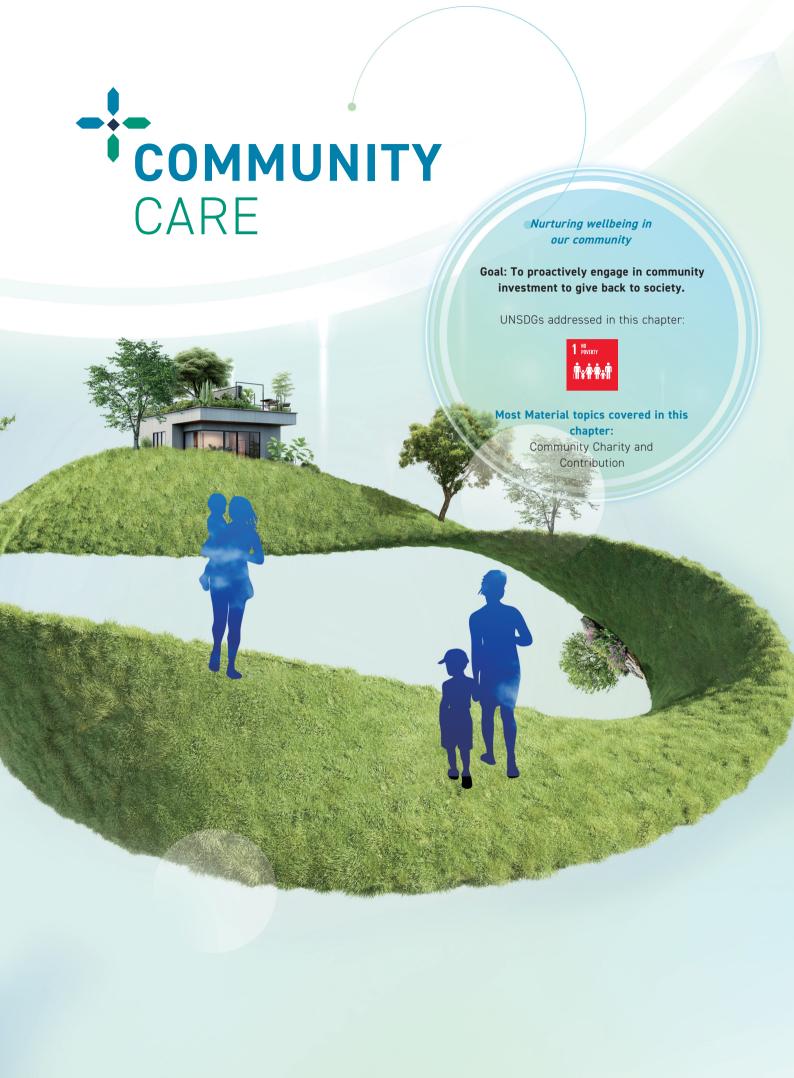


#### **Engineering Safety Training**

To ensure that our employees are fully aware of safety practices, we provided training sessions on engineering safety management to employees from the production department and project management department during the Reporting Period to enhance their relevant knowledge and skills.

We organised emergency and fire drills during the Reporting period to enhance employees' preparedness during fire emergency events. Our drills covered emergency warning, decision making, evacuation, rescue, firefighting, etc., ensuring that our emergency response measures could be implemented correct in the event of fire accidents.





## Community Care

The Group actively shoulders corporate social responsibility and strives to nurture a culture of social responsibility among our employees. Driven by our sustainability strategy, we encourage our employees to participate in community activities to give a helping hand to the needy. In the future, we will actively seek for opportunities to invest in the community and continually foster a socially responsible culture.

# Significant Laws and Regulations

Aspect	Significant Laws and Regulations
Aspect A. Environmental	<ul> <li>Ambient Air Quality Standards (《環境空氣質量標準》)</li> <li>Law of the PRC on the Prevention and Control of Atmospheric Pollution (《中華人民共和國大氣污染防治法》)</li> <li>Environmental Protection Law of the PRC (《中華人民共和國環境保護法》)</li> <li>Water Pollution Prevention and Control Law of the PRC (《中華人民共和國土壤污染防治法》)</li> <li>Soil Pollution Prevention and Control Law of the PRC (《中華人民共和國土壤污染防治法》)</li> <li>Standard for Pollution Control on Hazardous Waste Storage (GB 18597-2001) (《危險廢物貯存污染控制標準》)</li> <li>Management Measures for Hazardous Wastes Movement (《危險廢物轉移聯單管理辦法》)</li> <li>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》)</li> <li>Class II standard of the Environmental Quality Standard for Noise (GB 3096-2008) (《聲環境質量標準》)</li> <li>Class II standard of the Emission Standard for Industrial Enterprises Noise at Boundary (GB 12348-2008) (《工業企業廠界環境噪聲排放標準》)</li> <li>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》)</li> <li>Class III standard of the Standard for Groundwater Quality (GB/T 14848-2017) (《地下水質量標準》)</li> </ul>
	・ Class II standard of the Ambient Air Quality Standards (GB 3095-2012) (《環境空氣質量標準》)
Aspect B1: Employment	· Labour Contract Law of the People's Republic of China (《中華人民共和國勞動合同法》)
Aspect B2: Health and Safety	· Occupational Disease Prevention Law of the PRC (《中華人民共和國職業病防治法》)
Aspect B4: Labour Standards	<ul> <li>Labour Law of the PRC (《中華人民共和國勞動法》)</li> <li>Provisions on the Prohibition of Using Child Labour (《禁止使用童工規定》)</li> </ul>
Aspect B6: Product Responsibility	<ul> <li>Electric Power Law of the PRC (《中華人民共和國電力法》)</li> <li>Renewable Energy Law of the PRC (《中華人民共和國可再生能源法》)</li> <li>Advertising Law of the PRC (《中華人民共和國廣告法》)</li> <li>Patent Law of the PRC (《中華人民共和國專利法》)</li> <li>Civil Code of the PRC (《中華人民共和國民法典》)</li> <li>Trademark Law of the PRC (《中華人民共和國商標法》)</li> <li>Copyright Law of the PRC (《中華人民共和國著作權法》)</li> <li>Personal Information Protection Act of the PRC (《中華人民共和國個人信息保護法》)</li> <li>Data Security Law of the PRC (《中華人民共和國網絡安全法》)</li> <li>Cyber Security Act of the PRC (《中華人民共和國網絡安全法》)</li> </ul>
Aspect B7: Anti-corruption	・ Criminal Law of the PRC (《中華人民共和國刑法》)

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impact or relating to a	ies; and acceptance with relevant laws and regulations that have a significant on the issuer ir and greenhouse gas emissions, discharges into water and neration of hazardous and non-hazardous waste.	Significant Laws and Regulations	33
KPI A1.1	The types of emissions and respective emissions data.	Environmental Performance Summary	24
KPI A1.2	Direct and energy indirect greenhouse gas emissions and intensity.	Environmental Performance Summary	24
KPI A1.3	Total hazardous waste produced (in tonnes) and intensity.	Due to the business nature, the Group does not generate a significant amount of hazardous waste during the Reporting Period.	N/A
KPI A1.4	Total non-hazardous waste produced (in tonnes) and intensity.	Environmental Performance Summary	24
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KPI A2.1	Direct and/or indirect energy consumption by type in total (kWh in '000s) and intensity.	Environmental Performance Summary	24
KPI A2.2	Water consumption in total and intensity.	Environmental Performance Summary	24
KPI A2.3	Description of energy use efficiency initiatives and results achieved.	Energy Consumption and GHG Emissions	21
KPI A2.4	Description of whether there is any issue in sourcing water that is fit for purpose, water efficiency target(s) set and steps taken to achieve them.	Water Resources Management Our Green Targets	22
KPI A2.5	Total packaging material used for finished products, and if applicable, with reference to per unit produced.	Due to the business nature, the Group does not generate a significant amount of packaging materials during the Reporting Period.	N/A

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KPI B2.3	Description of occupational health and safety measures adopted, how they are implemented and monitored.	Health and Safety	29-30
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	losure mproving employees' knowledge and skills for discharging duties cription of training activities.	Training and Development	29
KPI B3.1	The percentage of employees trained by gender and employee category.	Training and Development	29
KPI B3.2	The average training hours completed per employee by gender and employee category.	Training and Development	29
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General Disclosure Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to preventing child and forced labour.		Talent Management  Significant Laws and Regulations	25-30 33
KPI B4.1	Description of measures to review employment practices to avoid child and forced labour.	Labour Rights Protection	28
KPI B4.2	Description of steps taken to eliminate such practices when discovered.	Labour Rights Protection	28

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KPI B5.1	Number of suppliers by geographical region.	Building a Responsible Supply Chain	16
KPI B5.2	Description of practices relating to engaging suppliers, number of suppliers where the practices are being implemented, how they are implemented and monitored.	Building a Responsible Supply Chain	16
KPI B5.3	Description of practices used to identify environmental and social risks along the supply chain, and how they are implemented and monitored.	ESG Risk Assessment and Management Building a Responsible Supply Chain	8
KPI B5.4	Description of practices used to promote environmentally preferable products and services when selecting suppliers, and how they are implemented and monitored.	Green Procurement	23
Aspect B6: P	Product Responsibility		
General Disclosure Information on: (a) the policies; and (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to health and safety, advertising, labelling and privacy matters relating to products and services provided and methods of redress.		Project Quality Management Significant Laws and Regulations  Due to our business nature, the Group does not involve any labelling matters	15 33
KPI B6.1	Percentage of total products sold or shipped subject to recalls for safety and health reasons.	Due to the business nature, product recall was considered as immaterial issue.	N/A
KPI B6.2	Number of products and service-related complaints received and how they are dealt with.	Project Quality Management	15
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	on: ies; and nce with relevant laws and regulations that have a significant n the issuer relating to bribery, extortion, fraud, and money	Ethical Operations  Delivering High-Quality Clean Energy For A Greener And Cleaner Future  Significant Laws and Regulations	16-17				
KPI B7.1	Number of concluded legal cases regarding corrupt practices brought against the issuer or its employees during the reporting period and the outcomes of the cases.	Ethical Operations	16-17				
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