



# ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

## Mission

As an ongoing commitment to generating long-term value for our stakeholders, Summit Ascent Holdings Limited (the “Company”) and its subsidiaries (the “Group” or “we”) have incorporated the principles of sustainable development into our business operation to help protect the environment and support the development of our community. Despite the Coronavirus (“COVID-19”) outbreak since 2020 and continuation in 2022, which affected businesses globally, the Group managed to operate related businesses under the consideration of sustainability, reflecting the Group’s commitment to fulfilling social responsibilities and to building a green environment. Thus, the Group prepared this Environmental, Social and Governance (“ESG”) report (“Report”) to provide our stakeholders with the information of our ESG policies, initiatives, and performance.

The Group’s major business operation is Tigre de Cristal (“TdC”), an integrated resort destination in the Primorye Integrated Entertainment Zone, Vladivostok, the Russian Federation. The reporting scope of this ESG Report covers the ESG information of the Group for the year ended 31 December 2022 (the “Reporting Period”), in accordance with the framework, reporting principles and the “comply or explain” provisions as set out in Appendix 27 – Environmental, Social and Governance Reporting Guide (the “ESG Reporting Guide”) of the Rules Governing the Listing of Securities (the “Listing Rules”) on The Stock Exchange of Hong Kong Limited (the “Hong Kong Stock Exchange”).

The two ESG subject areas, namely Environmental and Social, are disclosed separately, highlighting the impacts of the operations of the Group in Hong Kong and the Russia Federation during the Reporting Period.

We regard this Report as a communication channel with our stakeholders and believe that we should disclose ESG information that is meaningful and important to their decision-making. To serve this purpose, this Report is prepared with reference to the fundamental reporting principles of “mandatory disclosure” or “Comply or Explain” set out in the ESG Reporting Guide, as well as the principles of materiality, quantitative, balance and consistency. In preparing the Report, unless other specified, we have adopted the international standards and emission factors specified in the guidance materials on ESG issued by the Hong Kong Stock Exchange for computing the relevant Key Performance Indicators (“KPIs”), and there has been no change to the methods or KPIs used or any other relevant factors affecting a meaningful comparison of the ESG Report with the Group’s 2021 ESG Report. The application of materiality is detailed in the subsection headed “Materiality Assessment”.

## Source of Data and Reliability Statement

The information disclosed in the Report is retrieved from the Group’s internal documents, statistical reports and relevant public information. The Group confirms that the Report does not contain any false information, misleading statement or material omission, and is responsible for the authenticity, accuracy and completeness of the contents.

## Confirmation and Approval

The Report was approved by the Board of Directors of the Group (the “Board”) on 29 March 2023 upon confirmation by the management of the Group. The electronic version of the Report is available on the website of the Stock Exchange ([www.hkexnews.hk](http://www.hkexnews.hk)).

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## Contact Us

The Group greatly values the readers' opinions. Should you have any questions or suggestions about the Report, please contact the Group via:

E-mail: [info@saholdings.com.hk](mailto:info@saholdings.com.hk)

Postal address: Unit 1704, 17th Floor, West Tower, Shun Tak Centre, 200 Connaught Road Central, Hong Kong  
(For attention of Mr. Chiu King Yan, Executive Director)

## ESG Management

### Vision

The Group is dedicated to aligning its ESG governance with the strategic development and embedding ESG considerations in its business decision-making and daily operation. To this end, the Group has established a governance framework to manage ESG matters in operation. The Board is responsible for leading the governance and developing the Group's ESG management approach, strategies, priorities, and objectives. The Board delegates the Group's senior management with the authorities and responsibilities of developing, implementing and monitoring sustainable development policies and initiatives across business operations.

To better facilitate ESG management, the senior management has formed an ESG working group the "ESG Working Group", which is represented by the Audit Manager of the Group, in collaboration with the VP Finance of G1 Entertainment Limited Liability Company in the Russian Federation. The structure of ESG management is illustrated in the chart below:





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The ESG working group is responsible for coordinating with different departments to collect and analyse ESG-related operational data, promote and monitor the implementation of ESG strategies and initiatives, review stakeholders' feedback in daily operation, and report key ESG issues to the senior management and the Board. The operational departments, such as Human Resources, Construction and Facility Management, Surveillance and Security, Hotel and Catering, Casino Operation departments, are responsible for implementing ESG initiatives in their daily operations.

The Group has established both risk management and internal control systems to identify, evaluate, monitor, and manage ESG risks and opportunities such as customer data protection and ethical business behaviour. The Board oversees the management in the design, implementation, and monitoring of the risk management and internal control systems. The results of risk management and internal control review are reported to the Board regularly.

### **Stakeholder Engagement and Materiality**

In the course of its operation, the Group continues to pay attention to the major concerns of its stakeholders. The concerns and needs of our stakeholders provide us with information and directions to develop and enhance our sustainability strategy. We have engaged with the Group's major stakeholders on an ongoing basis to understand the diverse and often neglected opinions and expectations along the value chain. Various methods have been adopted to engage our stakeholders to identify current and emerging issues that they are most concerned about regarding the operations of the Group. Communication channels have been established for the stakeholder groups to collect the concerns about the impact we have on the ESG issues. Maintaining communication with stakeholders allows us to reflect on our sustainability strategy, and hence we can improve on material ESG issues. The following table summarises the methods of communication between stakeholders and the Group.

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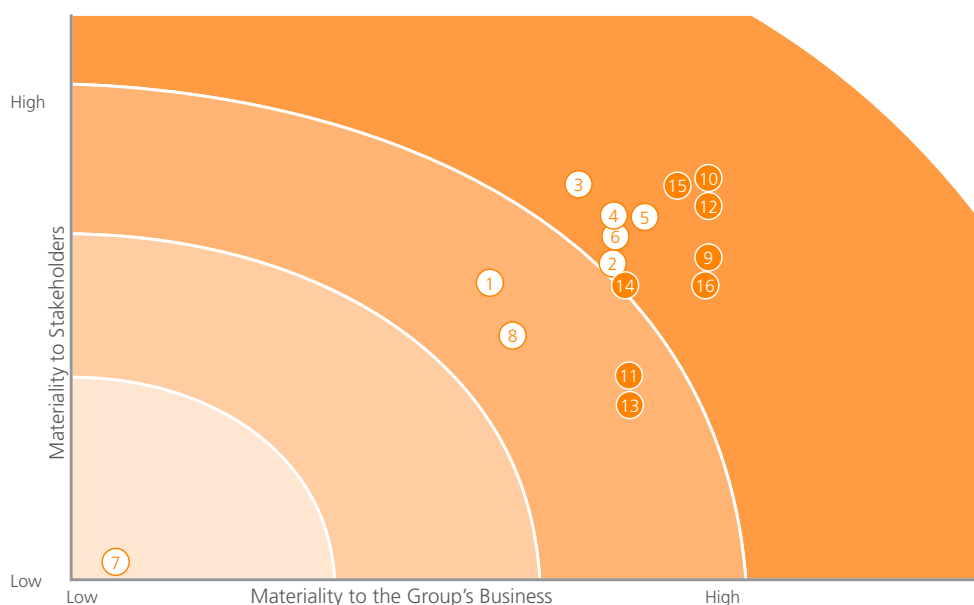
Stakeholder Group	Communication Methods
Shareholders	<ul style="list-style-type: none"><li>• Annual General Meetings</li><li>• Annual and Interim Reports</li><li>• Company's website</li><li>• Press releases</li><li>• Investor conference calls</li><li>• Investor one-on-one meetings</li><li>• Group meetings organised by sell-side brokers</li><li>• Non-deal roadshows</li><li>• Virtual site visits</li></ul>
Employees	<ul style="list-style-type: none"><li>• Staff Meetings &amp; Polls</li><li>• Staff Information Boards</li><li>• HR Supports via telephone and emails</li><li>• Comment boxes</li><li>• Staff Care Activities</li><li>• Regular Newsletter</li><li>• Social Media App (Telegram channel, Instagram)</li><li>• Whistleblowing Channels</li></ul>
Customers	<ul style="list-style-type: none"><li>• Feedback</li><li>• Satisfaction Surveys</li><li>• Customer Service Hotline</li><li>• Daily Contacts</li><li>• E-mail campaigns</li><li>• Business cards with QR code linked with different platforms</li></ul>
Suppliers	<ul style="list-style-type: none"><li>• Quotation and Tendering Processes</li><li>• Direct Communication Line for Suppliers</li><li>• Supplier Evaluation Mechanism</li></ul>
Community	<ul style="list-style-type: none"><li>• Community Services</li><li>• Online Social Media</li><li>• Local Press Releases</li></ul>

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## Materiality Assessment

During the annual assessment, the Board and the ESG Working Group would discuss and analysis the areas of ESG concerns, especially those raised by the Group’s stakeholders. The Group has identified ESG-related issues that may have potential impacts on its sustainable development from various sources, including the Group’s internal policies and some reflected by the industry trends, and the Sustainability Accounting Standards Board’s Materiality Map<sup>1</sup>. Such ESG-related issues have been analysed with reference to an array of factors, including the Group’s overall strategy, development, and goals and targets. The Group has conducted a materiality assessment to rate the identified ESG-related issues that are pertinent to its business and stakeholders, and their respective levels of impact. The Group has adopted relevant measures to cope with these factors, and therefore, the Group believes that these factors do not have a material impact on the financial and operational performance of the Group.

The results of the materiality assessment on the identified ESG-related issues are set out below:



### Environmental Matters

- 1 Air Emissions
- 2 Greenhouse Gas Emissions
- 3 Hazardous Waste
- 4 Non-hazardous Waste
- 5 Energy Consumption
- 6 Water Consumption
- 7 Environment & Natural Resources
- 8 Climate Change

### Social and Governance Matters

- 9 Employment
- 10 Employee Health and Safety
- 11 Development and Training
- 12 Labour Standards
- 13 Supply Chain Management
- 14 Product Responsibility
- 15 Anti-corruption
- 16 Community Investment

<sup>1</sup> Sustainability Accounting Standards Board’s Materiality Map, <https://materiality.sasb.org/>

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## Environmental

### Overview

As an integrated resort, the Group consumed energy and water, as well as produced air emissions and waste continuously throughout the Reporting Period to create the ultimate guest experience. As a responsible corporate, the Group is dedicated to minimising all energy and water consumption. Thus, the Group has developed and implemented a series of policies and measures to monitor and reduce our consumption and emissions continuously.

### Air Emissions

We take an active role in minimising our air emissions and complying with all relevant legal requirements. The law related to air emissions includes the Russian Federal Law No. 96-FZ on the Protection of Atmospheric Air. According to the above law, air emissions should be controlled under regulatory emission standards. Since 2020, a major overhaul of the gas boiler house was carried out, as well as a complete adjustment of gas equipment and gas burners by a service specialist, thereby reducing gas consumption, as well as emissions of combustion exhaust gas, namely nitrogen oxides, and carbon oxides.

During the Reporting Period, we engaged a specialised organisation in carrying out the technical maintenance of the gas boiler house, followed by adjustment of gas burners in order to minimise harmful impurities emitted into the atmosphere, and cleaning the gas storage from accumulated deposits and harmful impurities in order to improve equipment operation and reduce possible emissions into the atmosphere.

Due to the Group's business nature, there is consumption of liquefied petroleum gas ("LPG") for the heating system in the resort. The Group also has a fleet of vehicles for serving its management team members and daily operations, which involves the consumption of diesel and petrol. The major air pollutants emitted from vehicles and LPG include Nitrogen Oxides (NOx), Sulphur Oxides (SOx) and Particulate Matter (PM).

*Details of exhaust gas generated by the Group's fuel consumption:*

<b>Types of Emissions</b>	<b>Unit</b>	<b>2022</b>	<b>2021</b>
Nitrogen Oxides (NOx)	Kg	<b>6,120.23</b>	6,234.46
Sulphur Oxides (SOx)	Kg	<b>6.72</b>	7.84
Particulate Matter (PM)	Kg	<b>425.19</b>	437.02

The Group has set a target of a 10% reduction in air emissions over the next 10 years and is keeping the current emission on track. To keep up with our current emission and to achieve further enhancement, the Group has adopted a number of measures, please refer to the section "Energy Consumption".



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## Indoor Air Quality

Since the opening of TdC in October 2015, the Group has paid attention to air quality in all premises for the health of our customers and employees. Therefore, we conduct regular ventilation system laboratory tests and take timely measures to prevent the accumulation of pollutants in our ventilation engineering systems.

Since 2020, ozone-generating equipment was installed in the ventilation systems, which enabled purification, disinfection, and indoor air deodorization using ozone. Ozone is a powerful bactericidal agent, and it maintains an ecological balance by:

- Removing unpleasant odours such as smoke and fumes;
- Increasing oxygen in the premises; and
- Preventing the presence of pathogenic microorganisms, including moths, microbes, dust mites, parasite larvae, etc.

During the Reporting Period, for the stable and high-quality operation of the ventilation systems in the casino, major maintenance of the ventilation systems was carried out with a complete rinsing and cleaning of the ventilation machines and replacement of filters. Our inventories, including the stationary sources have also been upgraded to reduce the amount of the air emission pollutants. The mandatory procedures were performed within the framework of the IEC with regard to impacts on the environment, including the “On the Protection of Atmospheric Air” Federal Law, “On Environmental Protection” Federal Law and the “On Approval of the Procedure for Conducting an Inventory of Stationary Sources and Emissions of Harmful (Polluting) Substances into the Atmospheric Air, Correcting Its Data, Documenting and Storing Data Obtained as a Result of Such Inventory and Correction” under the Order of the Ministry of Natural Resources in the Russian Federation. Monitoring of compliance with environmental requirements and standards is carried out in accordance with the terms of the above permits received by the Group. Sampling and analysis of gas emissions, atmospheric air, wastewater are carried out according to the plans-schedules of the Group’s laboratory control.

During the Reporting Period, the Group has complied with all applicable environmental portion laws and regulations that have a significant impact on the Group.

## Greenhouse Gas Emissions

The Group’s indirect greenhouse gas (“GHG”) emissions result principally from purchased electricity and business trips taken by our employees. While direct GHG emissions incurred fundamentally from the combustion of fuels by the vehicles and the LPG heating system, as well as diesel consumed for power generation.

During the Reporting Period, the total GHG emissions which mainly attributed to direct (Scope 1) and indirect (Scope 2) emissions, weighted 5,959.20 tonnes (2021: 6,461.62 tonnes). With regard to our 1,004 employees, the GHG emissions intensity was approximately 5.94 tonnes per employee (2021: 6.50). The decrease in both total GHG emissions and the intensity is attributed to the Group’s continuous effort in energy saving throughout the year.

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Detailed breakdown of GHG emissions by the Group:

Types of Emissions	Unit	2022	2021	Total GHG Emission (in %)
<b>Scope 1 – Energy Direct Emissions</b>				
Combustion of fuels by the vehicles (Petrol, Diesel)	Tonnes CO <sub>2</sub> e	<b>1,056.21</b>	1,237.54	46%
Combustion of fuels (Liquefied Petroleum Gas, "LPG")	Tonnes CO <sub>2</sub> e	<b>1,667.88</b>	1,893.22	
Combustion of fuels (Diesel)	Tonnes CO <sub>2</sub> e	<b>3.48</b>	3.11	
Release of refrigerants from the operation of equipment and systems	Tonnes CO <sub>2</sub> e	<b>17.25</b>	71.22	
Assimilation of CO <sub>2</sub> through tree planting <sup>2</sup>	Tonnes CO <sub>2</sub> e	<b>(1.82)</b>	(1.45)	
<b>Total</b>	Tonnes CO <sub>2</sub> e	<b>2,743.00</b>	3,203.64	
<b>Scope 2 – Energy Indirect Emissions<sup>3</sup></b>				
Electricity	Tonnes CO <sub>2</sub> e	<b>3,216.20</b>	3,257.98	54%
<b>Total Emissions</b>				
Total Emissions	Tonnes CO <sub>2</sub> e	<b>5,959.20</b>	6,461.62	100%
Emission Intensity <sup>4</sup>	Tonnes CO <sub>2</sub> e/ number of employees	<b>5.94</b>	6.50	

Setting up feasible emission targets on a yearly basis helps the Group to track its GHG emissions and achieve a higher level of sustainability in its business progressively. Thus, considering possible business expansion and fluctuating needs for business travels in the condition of COVID-19, the Group targets to reduce GHG emissions by 15% in 5 years due to the gradual replacement of old vehicles and have been keeping on track with the set target. The Group will continue to focus on emission reduction in order to keep on track with the current emission target.

<sup>2</sup> To fulfil its social responsibility, during the Reporting Period, the Group planted 79 trees in accordance with their gardening plan and result in the assimilation of carbon dioxide as 1.82 tonnes.

<sup>3</sup> According to the Country Specific Electricity Grid Greenhouse Gas Emission Factor (2021) published by Carbon Footprint in 2022, the Emission Factor of purchased electricity in the Russian Federation is 0.3102 t-CO<sub>2</sub>/MWh.

<sup>4</sup> Intensity calculated by dividing tonnes of carbon dioxide equivalent by total number of employees in the Group. Total number of employees as at 31 December 2022 was 1,004 (2021: 994).



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## Waste Management

### Hazardous Waste

During the Reporting Period, the Group generated a total of 0.62 tonnes (2021: 3.16 tonnes) of hazardous wastes, including but not limited to oil-contaminated cleaning material, used tires and computers, building waste, luminescent lamp and batteries, in which the waste is transferred to licensed third-party organisations for disposal. The intensity per number of employees is 0.00062 (2021: 0.00318). The decrease in both total waste generated and the respective intensity were due to the Group's effort in waste reduction during the Reporting Period. With the Group's continuous commitment in waste reduction initiatives, the Group is committed to reducing the intensity of hazardous waste generation by 10% in the next 5 years and have been keeping on track with the target.

Details of the emission data of the Group:

Types of Emissions	Unit	2022	2021
Hazardous waste	Tonnes	<b>0.62</b>	3.16
Hazardous waste intensity <sup>4</sup>	Tonnes/number of employees	<b>0.00062</b>	0.00318

### Non-Hazardous Waste

During the Reporting Period, the main solid emission totalled 823.90 tonnes (2021: 921.02 tonnes), which included food waste, along with various general waste, including domestic garbage, cooking oil, plastic, cartons and cardboard. The intensity per number of employees is 0.82062 (2021: 0.92658). With the Group's continuous commitment in waste reduction initiatives, the Group is committed to reducing the intensity of non-hazardous waste generation by 10% in the next 5 years and is keeping on track with the target with its reduced intensity for the Reporting Period.

Details of the emission data of the Group:

Types of Emissions	Unit	2022	2021
Non-hazardous waste	Tonnes	<b>823.90</b>	921.02
Non-hazardous waste intensity <sup>4</sup>	Tonnes/number of employees	<b>0.82062</b>	0.92658

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## Sewage Management

During the Reporting Period, the Group discharged 45,673 m<sup>3</sup> of sewage (2021: 42,473 m<sup>3</sup>), an increase caused by the constant expansion and upgraded use of resort complex. According to the Water Code of the Russian Federation no. 74-FZ, all natural persons and legal entities are required to protect water bodies and any behaviours that lead to water contamination is forbidden, in which discharge of wastewater is prohibited. To comply with the regulation, the Group has assigned external company for the service of grease removal in water body. To reduce oil pollution, a centralised grease tank is installed in the sewage system, in which monthly pressurized cleanings of grease pits is carried out to minimise harmful waste and accumulation of grease deposits in the system. In the Reporting Period, 570 m<sup>3</sup> (2021: 318 m<sup>3</sup>) of the grease mixture was pumped out of grease traps to reduce general harmful pollutants and prevent them from entering the environment and cause water body contamination.

## Measures to Mitigate Air and Greenhouse Gas Emissions

During the Reporting Period, the Group continued to endeavor to further reduce emissions. The Group has kept utilising the “Green ECO” grade of gas only. The Group has also successfully reduced gas consumption by 10,000 liters comparing to the previous year. Also, one Nissan X-Trail (4th eco class) was replaced by new Mazda CX-5 (5th eco class) and 2 EZ Transport big buses were replaced by new ones as well. Along with the regular development of Vladivostok and Artem in the Russian Federation, the Group is considering the possibility of purchasing electric buses, though it is limited by constrains like qualified maintenance, charging stations, weather conditions in the country.

## Waste Handling and Reduction Initiatives

As the current Russian laws relating to waste management such as “Federal Law No. 89-FZ on Production and Consumption Waste” mainly focus on regulating hazardous waste management and the Group has not produced any significant types of hazardous waste, there is no other local law considered as material in this respect.

The Group separates waste into two categories, food and non-food. A categorisation system has been developed for each type of waste to report to the Federal Service for Supervision of Use of Natural Resources. During the Reporting Period, the Group transferred all wastes, including bio-waste, to licensed third-party contractors regulated by the Russian Federation – the Regional State Unitary Enterprise Primorsky Ecological Operator. Even though there were no significant and relevant legal requirements, we have integrated the principles of “Reduce”, “Reuse” and “Replace” into our operations, especially for food waste due to the size of our food and beverage business. To avoid ordering excessive food, we strive to improve our procurement planning process continuously. For example, we have deployed an interface between the Point of Sale System in our restaurants and the Material Control System for procurement to allow accurate consumption monitoring to control our purchases and minimise food waste. We have explored the opportunity to collaborate with a local farm to recycle some of our food waste for animal feeding.

During the Reporting Period, fluorescent lamps were replaced with light-emitting diodes (“LED”) ones, which made it possible to reduce the generation of hazard class 1 waste by 50%. All types of generated waste that can be reused were also transferred for processing to third parties. The Group has also introduced a separate collection of household waste. In the Reporting Period, the transfer of cardboard to a third-party organisation for further processing was increased by 5 tons compared to the previous year. Paper consumption was also reduced through the widespread use of electronic document management systems.



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The Group's operations do not include the production of a material number of hazardous wastes, except for battery wastes, including single-use alkaline batteries containing various hazardous materials such as heavy metals and acids. Nonetheless, the Group has collected all used batteries and delivered them to one of the dedicated "drop off sites" in the city. Also, as part of the control in the field of waste production management, the Group organizes control over generated and disposed wastes, in which the procedures include calculating the amount of payment for the negative impact on the environment (NEP), compiling and timely coordinating statistical reporting in accordance with the established forms, monitoring the implementation of plans for environmental protection measures, organizing prompt resolution of current environmental issues arising from the course of the enterprise's production activities. The Group also organizes timely removal and transfer of wastes to licensed organisations, and provides information on the formation, processing, disposal, neutralisation, transportation and disposal of production and consumption waste annually in accordance with Form 2-TP (waste). The Group maintains a Journal of accounting in the field of waste management, approved by the Order of the Ministry of Natural Resources of Russia dated 1 September 2011 No. 721.

Furthermore, although the recycling business in Vladivostok has not yet been fully established, we have been continuously and actively seeking recycling partners to utilise our discarded resources instead of disposing directly to landfills. Moreover, we have launched other initiatives such as the deployment of an electronic communication platform to reduce printed materials, installation of recycling facilities in our properties, as well as various staff and guest education programs for better waste management. We have also adopted a waste sorting operation to separate cooking oil, food waste, and construction waste to ensure they are properly collected and handled by relevant licensed contractors.

### Use of Resources

The Group is committed to becoming a resource-saving and environmentally-friendly enterprise to promote environmental protection. We have been working actively to reduce our usage of resources, as well as our emissions, to reduce the negative impacts on natural environment.

### Energy Consumption

The Group's direct energy consumption stems from non-renewable fuel consumed by vehicles and the LPG heating system, while the indirect energy consumption stems from purchased electricity.

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During the Reporting Period, the total amount of fuels consumed by vehicles, diesel power generation and the LPG heating system totalled 11,822.49 MWh (2021: 13,562.51 MWh), while the units of electricity purchased from electricity providers totalled 10,368.16 MWh (2021: 10,502.82 MWh). The total energy consumption of the Group during the Reporting Period totalled 22,190.65 MWh (2021: 24,065.33 MWh), which indicates a decrease of approximately 7% attributed to the Group's effort in energy saving and resources minimisation for the sake of sustainable development.

	Unit	2022	2021
Fuel consumption	MWh	<b>11,822.49</b>	13,562.51
– Diesel & Petrol	MWh	<b>4,132.17</b>	4,833.19
– LPG	MWh	<b>7,690.32</b>	8,729.32
Electricity consumption	MWh	<b>10,368.16</b>	10,502.82
Total energy consumption	MWh	<b>22,190.65</b>	24,065.33
Intensity	MWh/ number of employees	<b>22.10</b>	24.21

The Group has developed and implemented a series of resource-saving measures in different aspects of our business operations to reduce energy consumption:

- An electrical heater has been installed on the hot water line to heat water in spring and autumn. The energy consumption of the new electrical heater is more efficient than that of the previous LPG heater.
- The insulation of the foyer area has been improved by replacing glass doors with framed aluminium doors. The replacement of glass doors has solved the problem of cold air entering the foyer area through door gaps during winter, thereby requiring more heat to maintain a comfortable indoor temperature. We have also strengthened the insulation of the revolving door to reduce heat loss during winter.
- Normal light bulbs have been replaced with LED lighting, a highly energy- efficient lighting technology, on our property to reduce energy consumption.
- A key card power switch has been installed in each guest room to facilitate energy saving when the room is not in use, as well as an automatic daylight switch at the carriage porch which helps save electricity for lighting.
- A Building Management System has been put in place to monitor both power and water usage regularly, to evaluate the resource-saving initiatives, and to identify sources of excessive resource consumption such as facilities not in use and idle areas with full lighting to better monitor and minimise energy consumption costs.
- The window vents in the guest rooms were improved with the replacement of sealing rubber bands in order to minimise heat loss in the hotel rooms and reduce heating costs.
- Regarding casino, work was carried out to verify all the devices for monitoring indications on thermal and ventilation systems, in order to minimise costs and improve core performance.
- Regarding hotel rooms, work was carried out to eliminate the places of cold entry with the use of special thermal imaging equipment, to save heat supply and comfort guests.

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The Group will consider the possibility to include/switch to renewable energy (solar/wind) in the future. However, solar energy is still under development for the current climate conditions. The Group has set a target of a 10% reduction in energy consumption over the next 10 years and is keeping track with the target in Reporting Period. To achieve so, on the street territory of the casino, time sensors for outdoor lighting were installed and put into operation in order to save energy on lighting. Conventional lighting of the building is also replaced with LED lamps for energy reduction.

## Water Consumption

As water is one of the most precious resources in the world, reducing water consumption is one of the fundamental targets of the Group. The Group always encourages the reduction in unnecessary water consumption. The existing water supply is stable and meets the Group's daily operational needs, thus no issue of sourcing water is identified. Water resources are mainly used in resort operation.

During the Reporting Period, the total water consumption of the Group totalled 43,718 (2021: 49,865) tonnes, with an intensity of 43.54 (2021: 50.17) tonnes per employee. The decrease in both total consumption and the respective intensity are attributed to the Group's continuous effort and measures implemented for water consumption reduction and resource minimisation, in which there was a decrease of approximately 12% for the consumption level, keeping on track with the target from previous reporting period.

	Unit	2022	2021
Water consumption	Cubic meter	43,718	49,865
Intensity	Cubic meter/number of employees	43.54	50.17

The Group has also developed and implemented a series of resource-saving measures in different aspects of our business operations to reduce water consumption:

- Water-friendly housekeeping practices have been promoted to avoid unnecessary towel and bedsheet changes while maintaining a high hygiene standard.
- Water-friendly laundry practices have been promoted to avoid excessive usage of water on washing uniforms and guest laundry.
- Automatic sensor faucets have been installed in washrooms to control water overuse.
- Relevant signage has been placed in guest rooms to communicate the impacts of unnecessary washing of towels on the environment to our guests.

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- In-house training sessions have been organised for employees to maintain water usage at an optimum level for the purpose of both water conservation and business operations.

The Group has set a target to water efficiency targets by reducing consumption by 10% over the next 10 years. To achieve so, the Group has adopted the above-mentioned measures and implemented a drip irrigation system for the outdoor adjacent territory and lawns to save cold water consumption. Regarding water sourcing, the Group will consider the possibility to reuse waste water within the resort complex to further reduce water consumption. Aside from the above, the Group consumed municipal water in our operations, and there was no significant issue in sourcing water that is fit for purpose during the Reporting Period.

## Packaging Material

As the Group's business field lies in gaming and resort operation, the Group in the ordinary course of business does not involve any material usage of packaging materials.

## The Environment and Natural Resources

The Group is aware that the gaming and resort development project in Vladivostok required the removal of trees in certain parts of the site. To mitigate the impact, we developed an annual tree plantation plan which has been executed since 2017. We continually develop the landscaping of the premises and adjacent areas around the TdC complex and execute plans for tree plantation in line with our commitment to keeping the areas as green as possible, together with building up grass embankments to avoid any soil erosion. The main goals of the Group in the field of environmental protection and environmental safety are the rational use of natural resources, minimising damage to the environment from the activities of the Group and preservation of a favorable environment for future generations.

To comply with state regulation and control, the Group promptly applies permit for projects with negative environmental impact identified and timely processes relevant payment in accordance with applicable law. The Group ensures that environmental requirements are taken into consideration when purchasing technologies, materials and equipment, performing works and services by contractors. This is secured by amending obligations in contracts with suppliers and contractors in relation to the availability of necessary permits for environmental and sanitary-hygienic documents for activities, products, and materials. This is in addition to their compliance with the requirements of the Group's regulatory documents in the field of environmental protection in the course of work on the territory of the Group.



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In terms of ensuring the reduction of the negative impact on the environment and the rational use of natural resources, the Group ensures the implementation of energy-saving and resource-saving technologies at the Group's facilities, and the reduction the volume of household and industrial waste generation. The Group have continued the clean-up of areas around Lot 8 to ensure all construction-related items stored outdoors were handled in accordance with the proper practice of the Russian Federation and to minimise environmental impacts. During the reporting period, the Group continued its landscaping program in the surrounding area and planted a total of 79 trees and bushes, along with sanitary treatment of trees and shrubs in the forest area adjacent to the complex, which includes removal of broken, damaged, dry branches and trees.

In accordance with the Federal Law "On Environmental Protection", the Group was assigned the appropriate category in terms of the degree of impact on the environment, in which 3 objects were identified as follows:

- Industrial site No. 1 Multifunctional entertainment complex with a casino;
- Industrial site No. 2 Boiler house for gas fuel; and
- Industrial site No. 3 Communal zone of the gambling zone.

All three sites pose a slight negative impact on the environment and belong to category 3. The sources of emissions generated in each site are identified as follows: 32 sources of pollutant emissions were registered on the territory of Industrial Site No. 1 – "Hotel complex with a casino", which includes 19 organised sources of emissions (production room exhaust – 1 unit, laundry and dry cleaning ventilation – 1 unit, diesel generator sets 2 units, garage – 1 unit, general facility ventilation 13 units, smoke removal unit 1 unit) and 14 unorganised sources of emissions (parking for vehicles 7 units, oil and grease trap 1 unit, local treatment plant – 1 unit, sewage treatment plant 1 unit, carpentry workshop – 1 unit, welding post 1 unit, tank car for the transportation of liquefied gas 2 units). Within the framework of our industrial environmental control, laboratory instrumental control of stationary sources is carried out annually for compliance with the maximum permissible values of pollutant emissions into the atmosphere.

### "Save the Tiger" Campaign

The Group understands the importance of protecting endangered animals. The extinction of many animal species poses a great threat to the natural equilibrium, causing ecological disasters such as further extinctions and the proliferation of certain species. Hence, we have adopted a female Siberian tiger named Cristal to provide support to conserve this endangered tiger species. She has been housed at a private zoo, and we are dedicated to providing a healthy and pleasant living environment for her.

# ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

## Climate Change

Although the Russian Federation is behind other countries in terms of recycling and environmentally friendly policies, the Group has been adopting and implementing measures in promoting sustainability in addition to just complying with local legislation. For example, the Group is looking into the possibility of switching to renewable energy sources and participating in government incentive schemes to further enhance our corporate responsibilities regarding climate change. For instance, using this chance to switch to renewable energy and participating in government incentives.

The Group reviews and identifies the climate-related risk annually while conducting the risk assessment. We have considered the potential climate-related risks in respect of the recommendations of the Task Force on Climate-related Financial Disclosure, which are the physical risks such as extreme weather conditions and transition risks such as regulatory change on environmental matters, and summarised as below:

Risks	Potential Financial Impact	Short (current Reporting Period)	Medium (1-3 years)	Long (4-10 years)	Mitigation Strategy
<b>Physical Risks</b>					
<ul style="list-style-type: none"> <li>• Extreme weather conditions such as snowstorms and heatwaves</li> <li>• Falling water supplies</li> <li>• Sustained elevated temperature</li> </ul>	<ul style="list-style-type: none"> <li>• Reduced revenue from business and supply chain disruptions</li> <li>• Increased cost related to the rising need for cooling</li> </ul>	✓	✓		<ul style="list-style-type: none"> <li>• Established adverse weather condition policy</li> <li>• Adopted energy conservation measures</li> </ul>
<b>Transition Risk</b>					
<ul style="list-style-type: none"> <li>• Changes in environmental-related regulations</li> <li>• Shift to lower carbon economy</li> </ul>	<ul style="list-style-type: none"> <li>• Result in higher operating costs (fuel and energy) to adopt new practices</li> <li>• Entail extensive policy, legal, technological, and market changes to address mitigation and adaptation requirements related to climate change</li> <li>• Increase in fuel and energy cost due to increased taxation and environmental taxes</li> </ul>		✓	✓	<ul style="list-style-type: none"> <li>• Our Group has implemented energy conservation measures and taken sustainability and environmental issues into consideration for decision making related to business operation to meet the expectations of market and customers</li> </ul>





# ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

## SOCIAL

### Employment and Labour Practices

The Group values its employees and are devoted to protecting employees' rights, treating them fairly and equally, supporting employees' career development and fostering a safe working environment.

### Employment System and Labour Standards

The Group strives to provide a fair, respectful and inclusive work culture across all different aspects of employment, including but not limited to compensation and dismissal, recruitment and promotion, working hours, rest periods, equal opportunity, diversity and anti-discrimination, and other benefits and welfare, are clearly stated.

### Equal Opportunities

The Group is committed to maintaining a fair workplace and observing local regulatory requirements related to equal opportunities of employees, following the Labour Code of the Russian Federation No. 197-FZ. The Labour Code requires employers to ensure equality of opportunities such as promotion, professional training, talent retraining, professional development, implementing labour rights and remuneration of employees. Also, the Labour Code specifies the prohibition of dismissing employees who are temporarily disabled, pregnant, single mothers, or women having children under three years old.

In order to promote equal opportunities in the workplace, the Group has developed a number of Standard Operating Procedures ("SOP") to govern human resources management. These procedures articulate systematic and objective approaches to govern different areas of human resources management, including employment, dismissal, remuneration determination, performance evaluation, working hours, paid leaves, as well as other benefits to prevent employees from discrimination or unfair treatment due to age, gender, pregnancy, family background, race, skin colour, etc. We also encourage internal recruitment and provide our people with equal opportunities to develop their careers according to their interests and strengths.

### Compensation And Benefits

The Group offers competitive remuneration packages to attract and retain the best people and regularly reviews the remuneration packages of employees to make necessary adjustments based on prevailing market conditions and our business performance. Our remuneration packages consist of basic salary, bonus, overtime pay, daily travelling allowance for business trips, regional premium payment for employees in the Far East region of the Russian Federation, long-term service award, contributions to employees' provident fund, and a share option scheme for qualified directors and employees of the Group.

Our remuneration packages are determined in accordance with the Labour Code of the Russian Federation No. 197- FZ. The Labour Code requires employers to set the wage rate based on the qualifications of employees as well as the difficulties and conditions of the work, and the wage rate should not be less than the statutory minimum wage. The Labour Code also specifies that any overtime work should be compensated by means of providing additional time-off or the rates prescribed by the law and that the premium for night work should be at least 20% greater than the normal hourly payment for a day's work for every hour worked during night time. According to the Labour Code, the salary must be paid in the Russian Federation's currency and at least bi-weekly. In order to ensure compliance with regulatory requirements, we have established an SOP of remuneration based on the relevant laws and regulations in the Russian Federation to provide detailed and clear guidance.

## ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

The Group emphasises the “work-life balance” of employees, so we have granted our local Russian staff 36 calendar days of annual leave, in addition to public holidays and paid leave specified by the Labour Code of the Russian Federation, as well as granted early release on the eve of public holidays. Moreover, it is our policy to prohibit employees from working two consecutive shifts in order to ensure our employees are provided with enough rest time for the sake of their physical and mental health. To improve the work environment for staff, we started to provide dormitory accommodation within the Group’s premises for non-local employees.

Apart from the above, we provide health insurance for our permanent employees so that they can receive healthcare services and emergency medical assistance. In addition, we provide financial support for our employees in times of need, such as during severe illness and bereavement, to help them overcome hardships.

During the Reporting Period, we have reviewed and updated the following policies and standard operating procedures (“SOPs”):

- Internal Labour Rules and Regulations
- SOP for Voluntary Disclosure
- Employment Relations Procedure
- Policy on Employee transfer
- Dormitory General SOP
- Policy on employee relocation benefits and compensations
- Guidelines on HR management

We have also developed policies and SOPs:

- Policy on temporary transfer of employees to remote work
- Policy on use of electronic signatures
- Dormitory General SOP (was developed together with Housekeeping Department)
- Policy on electronic document management

The following human resource form templates have also been implemented:

- Order for annual leave
- Order for business trip
- Order for bonus
- Order for employee transfer

# ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

- Annual leave schedule
- Staffing table

During the Reporting Period, the Group has complied with all employment-related laws and regulations and there were no cases of non-compliance with the Labour Code.

## Employment

### *Total Number and Classification of Employees*

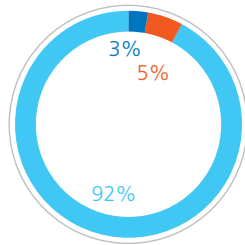
As at 31 December 2022, the Group had a total of 1,004 (2021: 994) employees, with 996 of them as full-time employees and 8 as part-time employees. The detailed employment information are as follows:

	<b>2022</b>
<b>Total Number of Employees</b>	1,004
<b>Distribution by Gender</b>	
Female	527
Male	477
<b>Distribution by Age Group</b>	
18-25	217
26-35	400
36-45	204
46-55	133
>55	50
<b>Distribution by Employee Category</b>	
Frontline & Other Staff	927
Middle Management	46
Senior Management	31
<b>Distribution by Geographic Region</b>	
Hong Kong	20
Russian Federation	984

# ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

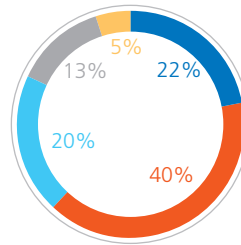
**Distribution by Employee Category**

■ Senior Management ■ Middle Management  
■ Frontline & Other Staff



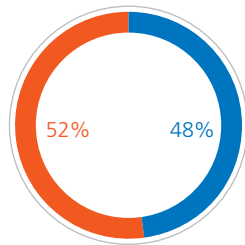
**Distribution by Age Group**

■ 18-25 ■ 26-35 ■ 36-45  
■ 46-55 ■ 56 or above



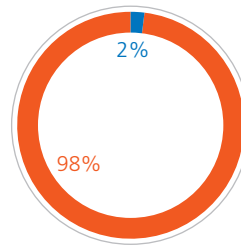
**Distribution by Gender**

■ Male ■ Female



**Distribution by Geographic Region**

■ Hong Kong ■ Russian Federation



## Connecting the People

During the Reporting Period, COVID-19 restrictions have been lifted which made it possible to conduct the following offline events for staff:

- Defender of the Fatherland day – we set up a crepe counter in the staff canteen, baked crepes and served to staff.
- International Women’s day – we set up a sweet buffet in the staff canteen and decorated staff canteen with flowers.
- Tigre de Cristal anniversary – we organised “Grand 7 birthday” staff party in Cuckoo nightclub with entertainments and prize draw.
- New Year 2023 – we conducted a New Year quiz and “New Year’s movies” employee talent contest with staff acting scenes from popular New Year’s movies. We also gave New Year presents to all employees.

# ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

During the Reporting Period, we have refreshed visual identity of our core values. Chief Operations Officer made values presentation to the Executive team, and Executives held meetings with staff to remind them of the principles that guide the Group's activities.

Sports can play an important role in improving employee physical and mental health. In the Reporting Period, the Group has supported the following sports events:

- Hero Race with 20 employees involved in the 8-km obstacle course racing; and
- Vladivostok International Marathon where our team made it to the top 10 best teams.

During the Reporting Period, we continued to recognize outstanding employees every quarter through our outstanding employee recognition program, and two outstanding employees were chosen by the executive team. We value our employees and appreciate those who have been with us for a long time. During the Reporting Period, we rewarded employees with appreciation letters for three years of service at our Group, and appreciation letters and pins for five years of service.

## Employee Turnover

As at 31 December 2022, a total of 360 employees left the Group and the employee turnover rate was at 39%. The detailed turnover information is as follows:

	2022
<b>Total Turnover Rate</b>	36%
<b>Distribution by Gender</b>	
Female	32%
Male	39%
<b>Distribution by Age Group</b>	
18-25	53%
26-35	35%
36-45	27%
46-55	29%
>55	26%
<b>Distribution by Geographic Region</b>	
Hong Kong	35%
Russian Federation	36%

# ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

## Employee Policies

The Group hopes to recruit the most talented and qualified persons from the job market, in order to bring immense value to the business and to build trust in its clients. Competitive remuneration packages and benefits are provided to attract high-calibre talents and motivate existing employees. Employees are entitled to the medical and dental insurance and reimbursement for work injury insurance. Employees are provided with basic statutory festive holidays, general holidays, marriage leave, maternity leave, paternity leave, injury leave and compassionate leave.

## Employee Health And Safety

The Group is committed to providing a healthy and safe workplace for all its employees. The Group has a long-standing commitment to maintaining a healthy and safe working environment for our people as well as meeting and exceeding the regulatory requirements as prescribed in the Labour Code of the Russian Federation No. 197-FZ and Federal Law No. 181-FZ on the Fundamentals of Occupational Safety and Health. These laws require employers to ensure the rights of employees to safe working conditions and meet the regulatory requirements of occupational safety and health such as terms of employment contract, the safety of buildings, facilities and equipment, training on safe methods and techniques for work, the safety rating of working conditions, handling of dangerous tasks, etc.

The labour protection policy includes the following key principles and goals, the implementation of which the Group undertakes:

- ensuring the safety and health of all employees of the organisation by preventing accidents and occupational diseases at work;
- compliance with relevant national laws and regulations, health and safety programs and other requirements to which the organisation is committed;
- obligations to consult the employees and their representatives and to involve them in active participation in all elements of the labour protection management system; and
- continuous improvement of the functioning of the labour protection management system.

The Group has also set up certain goals, which includes ensuring the safety and health of employees in the course of work, striving for zero injuries, exclusion of emergency situations and the prevention of occupational diseases. To achieve the goals and to comply with the requirements applicable to the activities of the Public International, Federal and Municipal Supervision, as well as other requirements in the field of industrial safety, labour protection and the environment, the Group undertakes the following:

- provide healthy and safe working conditions for employees by ensuring the trouble-free operation of equipment, introduction of new technologies, use of modern means of collective and individual protection and maintaining a high level of employees training in the field of safety & security;
- hold consultations with employees on issues of ensuring industrial safety, labour protection and the environment and ensure the availability of reliable information to them, also to increase the level of responsibility of each employee, regardless of his/her profession or position, in compliance with obligations in the field of occupational health and safety;



## ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

- assess all possible risks in workplace by taking into account the specifics and types of production and nature of risk, adopt measures to prevent industrial injuries, occupational diseases, as well as reduce the risk and scale of possible fire and emergency situations by setting up emergency situation handling measures, and prevent their spread beyond the territory of the Group's production facilities;
- develop and implement action plans, targeted programs to minimise and possibly eliminate risks, threats of accidents, emergencies, injuries and morbidity of personnel, improve the health of employees; and
- analyse the effectiveness of the Group's risk management system and indicators in the field of industrial safety, labour protection and the environment, and ensure the compliance of the labour protection management system with the Interstate standard GOST 12.0.230–2007 "System of labour safety standards. Occupational safety management systems. General requirements".

Regarding the pandemic situation, until July 2022, Russia had been subjected to restrictions due to the COVID-19 pandemic. The Group is taking every measure to prevent the spread of coronavirus infection among employees and guests. In July 2022, due to the ongoing decrease in the intensity of the epidemiological process, Rospotrebnadzor suspends previously introduced restrictions, including the mask regime, a ban on catering at night, and a number of other measures. Currently, the Group maintains anti-epidemic measures for the timely detection of cases and measures to ensure monitoring of the epidemic process as follow:

1. Bactericidal irradiators are used in production and guest rooms.
2. After the departure of guests in hotel rooms, disinfection of premises and ozonation are carried out.
3. Ozonation is provided in the staff canteen on a daily basis due to the high turnover of employees.
4. Employees continue to use hand sanitizer.
5. Employees with signs of a viral or infectious disease are not allowed to work.
6. If an employee feels a deterioration in health at the workplace, he is examined by a TdC medical officer who provides medical advice and refers the employee to medical treatment institution. If the medical officer suspects the employee of having a coronavirus infection, the patient is undergoing an express test for COVID.
7. Daily disinfection of contact surfaces.
8. The Group has a constant, unreduced stock of disposable medical masks in the amount of 50,000 pieces.
9. Employees of the Group are regularly trained in sanitary and epidemiological rules.

Ensuring the health and safety of employees, the creation of a safe working environment, the prevention of injuries, and the control of industrial and emergency risks is an indisputable priority of the Group.

# ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

Labour protection policy implementation:

- ensure it corresponds to the specifics of the organisation, its size, nature of activities and the scale of risks, and is also interconnected with the economic goals of the Group;
- provided to all employees of the organisation and located in easily accessible places for their familiarisation;
- subject for review to ensure continued compliance with changing conditions; and
- ensure the labour protection management system is compatible with other management systems of the Group.

During the Reporting Period, there were 3 cases of work-related injuries that resulted in 66 lost days of work, and 1 work fatality was recorded during the past 3 years including the Reporting Period. The Group will continue to monitor and work on occupational health and safety for the well-being of our employees.

	2022	2021	2020
<b>Work-related fatalities</b>	0	0	1
<b>Injuries</b>	3	4	1
<b>Lost days</b>	66	102	9

## Occupational Health and Safety Measures

During the Reporting Period, the Group has developed and implemented the following workplace health and safety principles and measures:

- None of the employees, including the management, can take any actions to put employees safety at risk;
- Employees are required to take responsibility for ensuring workplace safety strictly complies with the workplace health and safety requirements of our internal policy as well as all applicable laws and regulations;
- The Group's management is responsible for ensuring that working conditions follow the relevant sanitation and hygiene standards such as Russian National Standards (GOST), Industry Specific Standards (OST), and Sanitary Norms and Regulations (SanPin);
- Employees are obligated to complete relevant training on workplace safety as required by laws and regulations before taking up their job duties. For the purpose of better-quality training, we have made an instructional video on workplace health and safety for waiters, cooks, stewards, and housekeepers;
- Workplace safety risk assessment and analysis is conducted on a regular basis to identify and address areas of high safety risks;
- Employees are provided with adequate protective equipment and sanitary clothing as necessary for their job duties; and
- All work injuries and accidents, if any, should be investigated and reported in a timely manner.





## ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

With the above principles and measures, the Group has not identified any case of significant non-compliance with the aforementioned laws and regulations of the Russian Federation related to workplace health and safety during the Reporting Period.

In addition, employees undergo annual training in first aid provisions, electrical safety, and safe work practices. Employees involved in work with a high risk of danger undergo additional training in specialised centres to comply with the increased safety requirements. For example, this may include working at height using lifting machinery, control of lifting installation (elevating platforms), self-propelled special machinery (tractor, loader), handling disinfectants, and safe ways to work with reduced hydrocarbon gas. The Group has developed an action plan to localise the consequences of accidents at a hazardous facility (the gas-fired boiler house). The plan has been developed in order to plan the actions of the personnel of the organisation and specialised services at various levels of the situation development. In accordance with the plan, training is held monthly with the personnel of the boiler room, 2 times a year involving all concerned services.

### Development and Training

The skills and knowledge of our talents are of vital importance to the sustainable growth of the Group. Hence, we have developed structured corporate and departmental training programs covering a wide range of subjects, including leadership skills, mentoring techniques, management approaches, and language skills. We conduct annual staff performance appraisals. Moreover, we have made our promotion system clearer and more transparent for newly hired employees and developed career paths for operational positions. Each grade in the career path has a list of required knowledge, skills, and assessments to pass to move to the next grade. Each department is required to set training targets and develop their professional training programs based on training needs. During the Reporting Period, we identified the need for enhancing our staff's problem-solving skills and interpersonal skills. We will arrange more training courses relating to these topics to ensure continual improvement and operational needs of the Group.

To ensure all our employees have a thorough understanding of the Group, its mission and vision as well as their relevant responsibilities, we conduct induction training for all new employees to help them understand the Group's structure, history, values, the interaction between departments, general internal policies, and the importance of themselves in the growth of the organisation. During the Reporting Period, the Group conducted the induction program 24 times, of which 193 new employees participated in.

Below are our internal training sessions that employees of all departments could participate in during the Reporting Period:

- Emotional intelligence: How to make friends with your emotions and brain?
- Feedback as an employee development tool
- Body language
- Guest Service – Guest Relations
- Casino course (training for non-gaming departments)
- Casino business

## ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

Each department also has its own internal training programs to help employees acquire the knowledge and skills needed to reach their full potential and high performance as required in their sector.

During the Reporting Period, we have announced TdC Development Program with 117 high potential employees involved. During the first stage of the program, consisting of knowledge, skills and ability assessment, three teams were grouped based on their skills and knowledge. Other than internal training, we also encourage our employees to attend external professional training programs and obtain relevant qualifications for career development. During the Reporting Period, the following external training sessions were provided:

- Changes in the labour legislation. Results of challenging 2021. Trends and practical solutions for 2022
- Leadership during times of change: supporting yourself and your team
- XXIII Intellectual property forum. Russia and CIS countries 2022
- Flexible working hours management
- How to reduce tax risks in 2022
- Guide for operating dry cleaning machines
- Power Point course
- Manager and the team. Master class by Maksim Batyrev
- 6 factors of business resilience
- How to become a strong leader

Accordingly, we sponsor employees who attend external training in relation to their job duties where it is considered appropriate:

- Organised Korean courses for Table Gaming and Guest Services staff which were held during the months of March, April, May and October, November, December 2022 in which 30 employees participated.
- Accounting staff completed professional accounting courses on the specialised "Chief accountant" training platform.
- Arranged access to "Welcome PRO" platform for Food & Beverage and Kitchen employees to take video courses and tests to check their Kitchen and Restaurant management knowledge.
- Laundry employees completed an external advanced "Dry cleaning, washing, wet cleaning, and garments receiving" training course.
- 9 Housekeeping employees completed an advanced "Professional skills development for housekeeping staff" training course.
- 2 Human Resources and Table Gaming employees completed a 200-hour "Business coach practice" training course.

## ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

- Audit employees started “Internal Audit” continuing professional development program which will last up to April 2023.
- Human Resources Administrative Manager has completed “Mediation as alternative dispute resolution” training course and received a “Mediation specialist” certificate of qualification.

During the Reporting Period, we have changed visual design for training materials to be consistent with current graphic design trends. Our HR designer has completed After Effects “Fundamentals of animation” course.

Details of training in the Reporting Period are as follows:

	Number of employees	% of all employees
<b>Total Trainees</b>	576	57%
<b>Average training hours</b>		5.55

Distribution by Gender	Number of employees	% of trainees
Female	279	48%
Male	297	52%

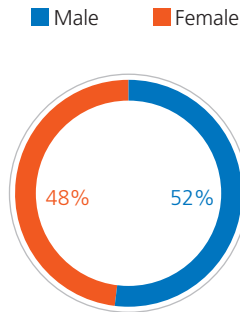
Training Hours by Gender	Total hours	Hours per employee
Female	2,721	5.16
Male	2,855	5.99

Distribution by Employee Category	Number of employees	% of trainees
Frontline & Other Staff	520	90%
Middle Management	36	6%
Senior Management	20	4%

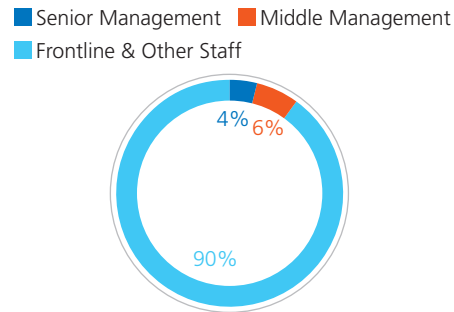
Training Hours by Employee Category	Total hours	Hours per employee
Frontline & Other Staff	2,583	2.79
Middle Management	1,850	40.22
Senior Management	1,143	36.87

# ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

### Distribution by Gender



### Distribution by Employee Category



## Labour Standards

The Group prohibits any child and/or forced labour in any of our operations. We do not employ any child below the age of 18. Prior to each employment, the Human Resources Department checks the candidates' personal information and documents to ensure they meet the local labour law requirements. If one is found to have provided false information during his/her working period, his/her contract may be terminated without notice and the Group will take follow-up actions in compliance with respective Article 81 "Termination of an employment contract at the initiative of the employer" from the Labour Code in the Russian Federation. Likewise, the Group forbids any forced labour using physical punishment, abuse, involuntary servitude, peonage, or trafficking. We ensure that each of our employees voluntarily signs the employment contract and accepts the employment conditions under the protection of local labour legislation such as the Labour Code of the Russian Federation. It is our highest priority to abide by the Labour Code in the Russian Federation, which aims to eliminate child labour and forced labour. Once discovered any violated cases, the Group would immediately initiate a thorough investigation into the incident. Either dismissal of related staff members by termination of contract or disciplinary actions might be acted against any related parties who are responsible for the causes of the incident.

During the Reporting Period, there were no cases of non-compliance with the child and forced labour related laws and regulations.

## Supply Chain Management

The Group seeks to select environmentally and socially responsible suppliers apart from the quality of goods, services, and suppliers' reputation. Our supplier evaluation criteria also focus on our suppliers' ESG performance, such as waste management practices, volunteer programs, and employee training development. We prefer suppliers that have been certified by the International Organisation for Standardisation (ISO) standards on environmental protection and social responsibility, such as ISO 14001 and ISO 26001.

As at 31 December 2022, the Group has a total of 767 suppliers, in which 758 are located in Russia and 9 in Hong Kong. The provision of goods and services of the suppliers included but not limited to food and beverage, hotel supplies, technical suppliers, casino supplies, office supplies and cleaning service.



# ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

## Engaging Suppliers Practices

As the Group does not tolerate any fraud and bribery in our supply chain, we have established a fair and transparent quotation and tendering process that obtain quotations from at least three suppliers (where possible) each time.

The Group has established a direct communication channel allowing suppliers to submit their offers for our consideration, our Purchasing Team or other related departments will analyse and feedback is given where necessary for further cooperation. Also, the Purchasing Department is constantly conducting market research via the internet to source and engage new reliable and beneficial suppliers into the Group's supply chain operation. There are several suppliers who directly seek meetings with the Purchasing Department. Meetings are always welcome and the relevant cooperation data are placed on the table during the meeting to consider further collaborative actions.

All potential suppliers are rigorously filtered with regards to financial stability, price, value for money (as this has to do with their quotations), payment terms, quality & safety, warranties, reliability, performance history, service & attitude, communication system, responsiveness, flexibility, agility, desire for business, delivery terms, risk, geographical location. Suppliers who meet our quality requirements for goods and services, as well as all relevant environmental and social measures with the best price, will be selected. Once a supplier is selected, a response to the offer will be made as soon as possible. Furthermore, the Group regularly evaluates each and every supplier's performance and requires them to take remedial measures once the Group becomes aware of any non-compliance with our requirements.

All collaborating suppliers, new and old, are monitored and reviewed throughout the duration of our cooperation. The results of this deliberation are reflected in the "Supplier's Selection & Evaluation" form. This is an official form that is reviewed and approved quarterly by the top management. Suppliers not able to meet the Group's norms and conditions are excluded from the supplier list. All the purchases are exclusively executed considering the "Supplier's Selection & Evaluation" Form.

## Practices Used to Identify Environmental and Social Risks

The Group makes use of the "EGAIS", "Merkuriy" and "Chestny Znak" web platforms which are provided and controlled by the government.

- "EGAIS" platform ensures the products' quality in all retail stores and catering establishments, for the provision of the best service to our guests.
- "Merkuriy" platform ensures proper veterinary certification of all our animal origin food products such as meat, fish, poultry, seafood, eggs, milk, etc. This way we can ensure the products' quality and, by extension, provide the best service to our guests.
- "Chestny Znak" web platform can ensure authenticity and declared quality of purchased products such as tobacco, bottled water, milk products, etc. We constantly ensure license validation and accessibility to this software and the government constantly expands the traced products list.

The Group also run the "MC Material Control" software program which manages all products throughout the supply chain process: (Orders, Receiving process, Storage, Transfers, Production, Consumption)

## ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

- This way we can control stock and mitigate the need for extra additional orders to suppliers which could increase trucks' mileage and thereby increase emissions.
- This "Stock Control" ensures an uninterrupted business operation in case of extreme weather conditions and other factors which might not allow suppliers' access to our premises.
- We fully monitor and control the "expiration date" of all our products to ensure their adequacy into our supply chain, in order to provide a superior service to our guests and employees and avoid potential wastage.
- We constantly ensure this license is up to date and accessible to this software.

We run daily "HACCP" Procedures according to Federal regulations.

- This way we ensure the safety of products and their quality throughout the supply chain process.
- Storage conditions are part of our daily control as well, to ensure a products' quality and avoid potential wastage.

Our supply chain process is fully supported by electronic means. Therefore, no paper is used during the supply chain process.

The Group fully complies with Federal legislation throughout the supply chain process, as this concerns the suppliers' license and related financial interactions and obligations.

- Contracts with the suppliers are always in place to ensure proper compliance with our mutual obligations. This ensures and keeps a constructive and creative relationship with them.
- All financial and other related obligations with our suppliers are fulfilled on time so as to ensure proper supply chain sustainability, trust, and loyalty with suppliers.

We maintain a continuously controlled and organised delivery and receiving plan to avoid extensive supplier truck routes. This way we help to minimise carbon emissions from the trucks' operation.

### Practices Used to Promote Environmental Preferable Products and Services

We preferably choose to cooperate with local suppliers to reinforce their business and support the local community and reduce travelling distance that contribute to the reduction of carbon footprint.

We encourage our suppliers to strengthen and optimise their business, products, and services through an open communication channel where we exchange valuable suggestions on our needs with regard to our guests' and employees' optimum service.

We make visits to our suppliers at the beginning of our relationship to observe their premises and to locate potential environmental and social risks. This way we ensure future cooperation, stable relationships, and a proper and sustainable service.

A thorough "Suppliers' Evaluation" process takes place quarterly to review the supplier's conformity rate. An agreement is set in place with our suppliers for them to keep sufficient stock in their stores with regards to our preferred products list. This way we can ensure a seamless delivery of our products, on time, to effectively support our operation on any unforeseen occasion.



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In extremely hot and cold temperatures conditions during special weather periods, we manage our supply chain process by checking the products' condition during the "receiving process" to prohibit substandard products from entering the Group's premises.

- This way the Group ensures appropriate quality products are served to our guests and employees.
- Furthermore, the receiving area's temperature is constantly measured and controlled in accordance with the relevant legislation and is not adversely affected by external weather conditions.
- Additionally, the Loading Bay has 2 separate entrances; a small one and a second, larger one. They are used accordingly to mitigate bi-directional temperature loss in extreme weather conditions.

We maintain a bi-directional information channel between customers, employees, the procurement team, and suppliers.

- This channel allows the exchange of information regarding products and services provided to our guests and employees, with the ultimate goal of upgrading those products and enhancing services.

The Group purchases products in bulk packaging, where applicable, to mitigate waste of packaging materials which, in turn, burden the environment. We use certified cleaning products from world-leading companies in regard to protecting the environment and providing the ultimate service to our guests and employees.

Since 2021, rules regarding EGAIS were introduced by Order of the Federal Service Responsible for Alcohol Market Regulation No. 397 dated 17 December 2020. They are valid from 1 January 2021 and apply to all retail stores and catering establishments, covering strong alcohol, beer, cider, mead, poire, and other alcoholic beverages. The deadline for sending the delivery data to the EGAIS has been reduced from three working days to one. However, the restriction is still valid only at the level of regulatory requirements, not technical ones. This means that the EGAIS does not reject documents because they were sent past the deadline.

During the Reporting Period, the Group made several site visits to inspect food suppliers' premises and operations. Any suppliers that failed to meet the Group's standards were replaced.

### Product Responsibility

#### *Responsible Gaming*

TdC holds a gaming license to conduct gaming business in the Integrated Entertainment Zone of the Primorye Region, under Federal Law No. 244-FZ of The State Regulation of Activities Associated with the Organisation of and Carrying out of Gambling Amending Individual Legislative Acts of the Russian Federation. Under the law, online gambling is forbidden, and gambling activities must be conducted within the designated areas with necessary security guards and precautions. Companies must possess the minimum net assets, capital, and satisfy other requirements such as the reporting requirement to retain their license.

In order to comply with the legal requirements, the Group has implemented a range of operational measures. For example, we have a Security and Compliance Department to monitor and safeguard our properties and to ensure it operates in accordance with the law. The Group has also assigned a dedicated team to verify our revenue on a daily basis for the accuracy of information used to report to the government authority. In addition, our senior management monitors the financial position of the Group every month to ensure the stability and health of its financial condition. According to the EOL hardware, upgrade plan and strategy, the EOL/EOS hardware has been replaced with new solutions with better analytics, making the network simpler, smarter, and more flexible, and accelerating enterprise service transformation and innovation.

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Furthermore, although there are no regulatory requirements for gaming operators in the region to control problematic gambling, the Group, as a responsible company, strives to promote responsible gaming through initiatives such as forbidding underage visitors to our casino, monitoring the gaming floor to identify customers who exhibit abnormal behaviour, and creating and promoting the responsible gaming slogan of “Winner Knows When To Stop” to build awareness amongst customers. Therefore, we have no significant non-compliance with the laws and regulations related to gaming operations during the Reporting Period.

Due to the Group’s business nature, we are not subject to the provision of products and hence product labelling, health and safety, and advertising issues are not applicable to the Group, and therefore no products have been subject to recall during the Reporting Period. Nevertheless, the Group has engaged with its industrial partners, government agencies, customers, and other stakeholders to continuously promote responsible gaming practices. No non-compliance with relevant laws and regulations that have a significant impact on the Group relating to health and safety, advertising, labelling and privacy matters relating to products and services provided have been identified during the Reporting Period.

### *Customer Satisfaction and Complaint Handling*



To maintain the highest standards of customer service, the Group has established a set of customer service policies to provide guidelines to our employees based on their duties, in areas such as handling customers’ enquires, complaint management, and standard service procedures. We have also developed extensive training programs for our frontline staff to equip them with the appropriate service skills along with communicating our expectations of their service quality. In addition, we collect customers’ feedback and follow up on their opinions in accordance with our internal protocol on a timely basis. The results are subsequently communicated to relevant employees as a part of their development and performance evaluation processes.

For the analysis of guests satisfaction “Trust You” application has been implemented, operating by Front Office Department. Surveys are receiving from more than 10 leading world platforms. More than 650 feedbacks and surveys were registered in 2022, which include complaints, wishes or appreciations from guests. Each complaint and recommendation was brought to the attention of the management of the department involved and resolved whenever possible or taken into account for the future. Each written complaint and certain verbal guest comments were given the comprehensive answer by the staff.

During the Reporting Period, out of the 650 feedbacks, a total of 41 complaints were received regarding general service, hotel and food & beverage. The Group have addressed all complaints and provided relevant complimentary service to guests, all cases were closed.

### *Intellectual Property Rights*



The trademark periods for  and  been extended until 23 April 2032 and 26 December 2024, respectively, in the Russian Federation. In addition, the trademark has been registered until 14 August 2027 in Macau, Japan, South Korea, North Korea, the Philippines, Laos, Singapore and Vietnam. An internet marketing specialist tracks all references to our trademarks. Whenever violations of TdC’s intellectual property rights are reported, the information is submitted to the Legal Department and necessary measures are taken accordingly. In cases of any unlawful trademark have use, the Legal Department will prepare and submit the complaint and prepare legal claims against the infringement.



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On 26 December 2024, the validity period is expiring for the following trademarks: TIGRE DE CRISTAL, TIGRE DE CRISTAL, TIGRE DE CRISTAL. Pursuant to the Russian legislation, the effect of the exclusive right for a trademark may be extended for ten years under application of the copyright holder to be submitted during the last year of this right's effect. Accordingly, the Legal Department will start the procedure to extend the validity period of the said trademarks in December 2023.

## Quality Assurance

We have implemented a concept of "Quality Circle" and developed "Cristal Standards" to set a high standard of service delivery for our employees. We hold regular meetings to evaluate the progress of our quality objectives and communicate with department heads who are accountable for measuring the performance of their teams and ensuring adherence to the Cristal Standards. We value feedback from our business partners and guests. As at 31 December 2022, more than 650 (2021: 282) feedbacks and surveys were received from more than 10 leading world platforms, which include complaints, wishes or appreciations from guests. Throughout the Reporting Period, new Online Travel Agencies were implemented, including:

- OneTwoTrip.com;
- Yandex.ru;
- 101Hotel.com; and
- Ostorovok.ru.

During the Reporting Period, the score received show a positive trend as follows:

- OneTwoTrip.com 9.9/10
- Yandex.ru 5.0/5.0
- 101Hotel.com 9.1/10
- Ostorovok.ru. 8.6/10

Tigre de Cristal Hotel & Resort's high-quality guest service is achieved by following staff to adhere to service standards. Each department has its own Standard Operating Procedures corresponding the international hospitality standards and helping to maintain the "branded" quality of service.

The Group values all our guests' feedback to improve our services further and meet our guest's expectations. We continuously strive to improve our service standards for a better guest experience. Every complaint and negative guest comment was duly registered and communicated to the managers of the departments concerned, with guests receiving comprehensive answers to all comments. During the Reporting Period, a "Trust You" survey is planned to be undertaken and installed, automating the work process of guest comments, measuring the level of satisfaction from all online sites, increasing the response rate through an automatic template installed in the software, and uploading and generate reports related to measuring the level of customer satisfaction. The Group also plans to revise the staff training plan and engage external trainers to help increase the amount of feedback and increase the level of guest satisfaction.

# ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

## *Consumer Data Protection and Privacy Policies*

The Group understands the concerns on data protection and privacy management for all our stakeholders. It is committed to protecting customers' and internal data privacy under the fast-changing market conditions with security updates while complying with the applicable laws and regulations. The Group has established standard procedures for data collection and handling based on the Federal Law of the Russian Federation. During the Reporting Period, the Group has not identified any case of significant non-compliance with data privacy laws in the Russian Federation, such as Federal Law No. 152-FZ on Data Protection and Federal Law No. 149-FZ on Information and Information Technologies and Information Protection. The purpose of the laws is to protect the citizens' rights while processing their data.

The Group only collects personal data when necessary and when required by law to conduct normal business operations. All personal data holders have the right to decide on the provision of personal data and consent to data processing unless exemptions are specified by the laws and regulations. Our employees are also required to sign an agreement to protect confidential information when employed and are aware of the importance of complying with our internal guidelines on protecting personal data and confidential information. In addition, except for designated personnel, employees do not have access to personal data and confidential information that is irrelevant to their job duties.

With respect to data security, the Group has established information security policies. It has deployed various measures, including closed-circuit television, physical locks, firewalls, and the prohibition of the use of unauthorized computer equipment and software to protect our servers from cyber-attack and unauthorized access. In case of cyber-attacks, the Group has established crisis management procedures to immediately respond to the situation and implement suitable mitigations to protect our data and system. The Group will also actively upgrade our data security technologies and physical measures whenever possible to maintain the highest data security level.

Over the past year, the Group invested heavily in the introduction of Electronic Data System in business processes related to communication with government agencies. These changes also affected the network infrastructure – old equipment is gradually being replaced with modern technical solutions with additional security updates and patches.

The Group strives to continuously improve our data security system and our approach to managing customers, employees, and the Group's confidential data management to achieve maximum data protection. During the Reporting Period, the Group has complied with all data privacy-related laws and regulations and there were no non-compliance cases revealed.

## **Anti-Corruption**

### *Anti-Money Laundering*

The Group's policy is to comply with all local and federal laws and regulations. Especially with the Russian Federal Law No. 115-FZ "On Countering the Legalization (Laundering) of Proceeds from Crime and Financing of Terrorism". The Federal Law 115-FZ is aimed at protecting the rights and legitimate interests of citizens, society, and the state by creating a legal mechanism to counter the legalization (laundering) of proceeds from crime, the financing of terrorism and the financing of the proliferation of weapons of mass destruction.



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In accordance with the Federal Law 115-FZ, the Group carries out transactions with cash or other property, and in accordance with Part 2 of Article 7 of the Law No. 115-FZ, it has developed strict Internal Control Rules, appointed special officials responsible for compliance with these Rules, and organised and implemented internal controls. It also conducts mandatory control of transactions with cash or other property, provided for in Art. 6 of the Law, carries out the identification of clients (representatives of clients and (or) beneficiaries, as well as beneficial owners), including taking reasonable and affordable in the current circumstances measures to determine the sources of funds or other property of clients, provided for by the Internal Control Rules of the Company.

During the Reporting Period, there were no non-compliance case with 115-FZ.

### *Whistle-Blowing Procedures*

The Group also provide an anonymous email as the whistle-blowing channel, which encourage employees and related parties (e.g. business partners, suppliers) to raise concerns and report any suspected corruption-related complaints. The Group will protect the confidentiality and anonymity of the whistleblowers to the fullest extent possible for the sake of privacy protection. Any suspected malpractices will be investigated by the Internal Audit Department and the complaints will be directed to appropriate department if necessary. Disciplinary actions or legal actions may be taken against the staff if the suspected complaint is found substantial.

### *Anti-Corruption Policy*

The Group has adopted a Guideline on Anti-Corruption to ensure that our hospitality and business development practices fully comply with all applicable anti-corruption laws and regulations, including the Prevention of Bribery Ordinance in Hong Kong and the Federal Law No. 273-FZ "On Fighting Corruption" in the Russian Federation.

### *Anti-Corruption Training*

The Group provides employee with training and instruction programs in relation to Anti-Money Laundering (AML)/Combating the Financing of Terrorism(CFT)/Proliferation of Weapons of Mass Destruction(WMD).

Training shall be held in the following forms:

- induction briefing;
- additional briefing;
- re-job training (receiving basic instructions necessary to enforce Russian legislation in AML/CFT/WDM, as well as shaping and improving internal control institution, programs of its implementation and other regulatory and administrative documents of the Company adopted for these purposes); and
- extension of knowledge in AML/CFT/WDM (hereinafter referred to as knowledge extension).

During the Reporting Period, a total of 16 hours training in the aspect of legal service were received by our employees. Attendance record was confirmed by a certificate issued by the organisation conducting such training, or a document confirming the conduct of introductory, additional instruction. Head of the Group (general director, executive director), chief accountant and director of legal affairs also receive training regularly with regard to anti-corruption to keep up with the latest regulations and standards.

# ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

## Community Investment

As a responsible corporate, the Group takes an active role in community investment and consistently makes positive contributions to our society. From an economic perspective, our integrated resort has created around 1,000 jobs for locals in Vladivostok. However, in 2022 the Group has experienced the following labour market changes – remote and hybrid work trends, potential candidates leaving the country, candidates choosing freelance jobs over official employment. To attract potential employees we regularly attended welcome days, career expos and student meetings in Vladivostok and Artyom universities and educational institutions. We also welcomed final-year students in Tigre de Cristal, gave them a tour of our resort and made a presentation on our vacancies and career advancement opportunities.

In 2022, the Group participated in the “Gaming & Entertainment Specialist” program based in Vladivostok State University. The program has obtained accreditation in the Russian Presidential Academy of National Economy and Public Administration and is a part of the “Employment promotion” federal program and “Demography” national project. The training program focused on both hard skills such as digital competencies, English and soft skills such as emotional intelligence, effective communication and teamwork, which the set of skills is unique for Primorye’s education market. Within six months, the participants have acquired new skills and joined the Group.

In collaboration with the administration of Primorsky krai, during the Reporting Period, the Group has participated in the following events:

- “Primorye youth labour market from employers’ perspective” roundtable discussion.
- “Young professionals in the labour market: challenges of competitiveness and job search” business game.
- “Relationship between tourism labour market, hospitality industry and education system” roundtable discussion.

Tigre de Cristal has become an attractive place to work not only for locals. This year, we have welcomed new hires from Amurskaia oblast, Irkutskaia oblast, Ekaterinburg, Krasnodar, Yalta, Ulan-Ude, Chelyabinsk, Novosibirsk, Voronezh, Saratov, Saint Petersburg, Magnitogorsk. Besides students from local universities (VVSU, FEFU), 8 students from Chelyabinsk International Institute of Design and Service chose Tigre de Cristal for their internship from April to September during the Reporting Period.

The Group practices corporate social and environmental responsibilities and regards public welfare as an important aspect of its corporate culture. Donation to local charity organisation and participation in charity activities are highly recommended to employees. Although the impact of the COVID-19 pandemic has restricted the Group from holding public welfare activities in the Reporting Period, we strive to actively contribute to the education, environment, and cultural aspects of the community in the future. The Group will explore opportunities in the neighborhoods, where it can invest resources and engage employees in the community service.



## ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

During the Reporting Period, the Group has contributed in the aspects of education, labour needs, local community and health. The Group has established an employee volunteer team, in which they continued to be a key component of our overall community engagement strategy and provides emotional and financial support to the local non-profit institutions: Artyom Boarding school for orphans and children without parental care and physically challenged children; and Vladivostok Special Boarding School for aurally challenged children. During the Reporting Period, our volunteer team has celebrated its 5th anniversary. We invited teachers and children of the boarding schools to Tigre de Cristal and gave them a tour of our hotel & resort. The children prepared a concert to congratulate our volunteers on the anniversary. The Group has also organised the following activities:

- “Career exploration event” in Artyom boarding school – together with the children we discussed conscious career decision-making process.
- Outdoor clean-up activities for Vladivostok Boarding School – volunteers helped clean and improve outdoor area, had a tea party afterwards and gave presents to the children.
- “Last bell” in Vladivostok boarding school – we attended the celebration concert and gave presents to the school graduates.
- “Football game” in Artyom boarding school – organised a football game for boys and gave a cheerleading lesson for girls. After the game, all participants were awarded with medals.
- Motivational meeting with Igor Skikevich, traveller with disabilities and extreme sports lover.
- “Barista school” in Vladivostok boarding school – we organised a coffee-making master class and explained bartender and barista role and responsibilities.
- “New Year charity event” in Artyom boarding school – volunteers organised a gingerbread cookie decorating master class and a quiz.
- “Christmas wishing tree” Russia-wide charity event – 17 of the Group’s management team members bought presents for the children facing tough life situations.

# ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

## Environmental, Social And Governance Guide Content Index

Aspect	Description	Chapter/Section
<b>A. Environmental</b>		
<b>A1 Emissions</b>		
General Disclosure	Information on: <ul style="list-style-type: none"> <li>(a) the policies; and</li> <li>(b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to air and GHG emissions, discharges into water and land, and generation of hazardous and non-hazardous waste.</li> </ul>	Environmental – Overview
KPI A1.1	The types of emissions and respective emissions data.	Air Emissions
KPI A1.2	Direct (Scope 1) and energy indirect (Scope 2) GHG emissions (in tonnes) and, where appropriate, intensity (e.g. per unit of production volume, per facility).	Greenhouse Gas Emissions
KPI A1.3	Total hazardous waste produced (in tonnes) and, where appropriate, intensity (e.g. per unit of production volume, per facility).	Waste Management
KPI A1.4	Total non-hazardous waste produced (in tonnes) and, where appropriate, intensity (e.g. per unit of production volume, per facility).	Waste Management
KPI A1.5	Description of emissions target(s) set and steps taken to achieve them.	Measures to Mitigate Air and Greenhouse Gas Emissions, Air Emissions, Greenhouse Gas Emissions
KPI A1.6	Description of how hazardous and non-hazardous wastes are handled, and a description of reduction target(s) set and steps taken to achieve them.	Waste Management, Waste Handling and Reduction Initiatives

# ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

Aspect	Description	Chapter/Section
<b>A2 Use of Resources</b>		
General Disclosure	Policies on the efficient use of resources, including energy, water and other raw materials.	Environmental – Overview
KPI A2.1	Direct and/or indirect energy consumption by type (e.g. electricity, gas or oil) in total (kWh in '000s) and intensity (e.g. per unit of production volume, per facility).	Energy Consumption
KPI A2.2	Water consumption in total and intensity (e.g. per unit of production volume, per facility).	Water Consumption
KPI A2.3	Description of energy use efficiency target(s) set and steps taken to achieve them.	Energy Consumption
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 Consumption
KPI A2.5	Total packaging material used for finished products (in tonnes) and, if applicable, with reference to per unit produced.	Packaging Material
<b>A3 The Environment and Natural Resources</b>		
General Disclosure	Policies on minimising the issuer's significant impact on the environment and natural resources.	The Environment and Natural Resources
KPI A3.1	Description of the significant impacts of activities on the environment and natural resources and the actions taken to manage them.	The Environmental and Natural Resources
<b>A4 Climate Change</b>		
General Disclosure	Policies on identification and mitigation of significant climate-related issues which have impacted, and those which may impact, the issuer.	Climate Change
KPI A4.1	Description of the significant climate-related issues which have impacted, the issuer, and the actions taken to manage them.	Climate Change

# ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

Aspect	Description	Chapter/Section
<b>B. Social</b>		
<b>B1 Employment</b>		
General Disclosure	Information on:  (a) the policies; and  (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to compensation and dismissal, recruitment and promotion, working hours, rest periods, equal opportunity, diversity, anti-discrimination, and other benefits and welfare.	Employment and Labour Practices, Employment System and Labour Standards, Equal Opportunities, Compensation and Benefits
KPI B1.1	Total workforce by gender, employment type (for example, full-time or part-time), age group and geographical region.	Total Number and Classification of Employees
KPI B1.2	Employee turnover rate by gender, age group and geographical region.	Employee Turnover
<b>B2 Health and Safety</b>		
General Disclosure	Information on:  (a) the policies; and  (b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to providing a safe working environment and protecting employees from occupational hazards.	Employee Health and Safety
KPI B2.1	Number and rate of work-related fatalities occurred in each of the past three years including the reporting year.	Employee Health and Safety
KPI B2.2	Lost days due to work injury.	Employee Health and Safety
KPI B2.3	Description of occupational health and safety measures adopted, how they are implemented and monitored.	Employee Health and Safety, Occupational Health and Safety Measures



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Aspect	Description	Chapter/Section
<b>B3 Development and Training</b>		
General Disclosure	Policies on improving employees' knowledge and skills for discharging duties at work. Description of training activities.	Development and Training
KPI B3.1	The percentage of employees trained by gender and employee category (e.g. senior management, middle management).	Development and Training
KPI B3.2	The average training hours completed per employee by gender and employee category.	Development and Training
<b>B4 Labour Standards</b>		
General Disclosure	Information on: <ul style="list-style-type: none"> <li>(a) the policies; and</li> <li>(b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to preventing child and forced labour.</li> </ul>	Employment System and Labour Standards
KPI B4.1	Description of measures to review employment practices to avoid child and forced labour.	Labour Standards
KPI B4.2	Description of steps taken to eliminate such practices when discovered.	Labour Standards
<b>B5 Supply Chain Management</b>		
General Disclosure	Policies on managing environmental and social risks of the supply chain.	Supply Chain Management
KPI B5.1	Number of suppliers by geographical region.	Supply Chain Management
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.	Supply Chain Management, Engaging Suppliers Practices
KPI B5.3	Description of practices used to identify environmental and social risks along the supply chain, and how they are implemented and monitored.	Practices Used to Identify Environmental and Social Risks
KPI B5.4	Description of practices used to promote environmentally preferable products and services when selecting suppliers, and how they are implemented and monitored.	Practices Used to Promote Environmental Preferable Products and Services

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Aspect	Description	Chapter/Section
<b>B6 Product and Service Responsibility</b>		
General Disclosure	Information on: <ul style="list-style-type: none"> <li>(a) the policies; and</li> <li>(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.</li> </ul>	Product Responsibility – Responsible Gaming
KPI B6.1	Percentage of total products sold or shipped subject to recalls for safety and health reasons.	Product Responsibility
KPI B6.2	Number of products and service related complaints received and how they are dealt with.	Customer Satisfaction and Complaint Handling
KPI B6.3	Description of practices relating to observing and protecting intellectual property rights.	Intellectual Property Rights
KPI B6.4	Description of quality assurance process and recall procedures.	Quality Assurance
KPI B6.5	Description of consumer data protection and privacy policies, how they are implemented and monitored.	Consumer Data Protection and Privacy Policies
<b>B7 Anti-Corruption</b>		
General Disclosure	Information on: <ul style="list-style-type: none"> <li>(a) the policies; and</li> <li>(b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to bribery, extortion, fraud and money laundering.</li> </ul>	Anti-Corruption
KPI B7.1	Number of concluded legal cases regarding corrupt practices brought against the issuer or its employees during the Reporting Period and the outcomes of the cases.	Anti-Corruption
KPI B7.2	Description of preventive measures and whistle-blowing procedures, and how they are implemented and monitored.	Anti-Corruption, Whistle-Blowing Procedures
KPI B7.3	Description of anti-corruption training provided to directors and staff.	Anti-Corruption Training



# ENVIRONMENTAL, SOCIAL AND GOVERNANCE REPORT

Aspect	Description	Chapter/Section
<b>B8 Community Investment</b>		
General Disclosure	Policies on community engagement to understand the needs of the communities where the issuer operates and to ensure its activities take into consideration the communities' interests.	Community Investment
KPI B8.1	Focus areas of contribution (e.g. education, environmental concerns, labour needs, health, culture, sport).	Community Investment
KPI B8.2	Resources contributed (e.g. money or time) to the focus area.	Community Investment