



STARLITE
HOLDINGS LIMITED

星光集團有限公司
(Incorporated in Bermuda with limited liability)
(於百慕達註冊成立之有限公司)

STOCK CODE 股份代號: 403

星光五十載



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ENVIRONMENTAL, SOCIAL AND
GOVERNANCE REPORT
FY 2019 / 2020

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OVERVIEW AND SCOPE

Pursuant to Appendix 27 Environmental, Social and Governance Reporting Guide (the “Guide”) of the Rules Governing the Listing of Securities on the Stock Exchange of Hong Kong Limited (the “Stock Exchange”), Starlite Holdings Limited (the “Company”), together with its subsidiaries (the “Group” or “we”) hereby present this Environmental, Social and Governance (“ESG”) Report to report ESG issues that have key environmental and social impacts and are relevant to the business of the Group for the year ended 31st March, 2020 (the “Financial Year”). Unless otherwise stated, the reporting period is from 1st April, 2019 to 31st March, 2020.

As a responsible corporate citizen, the Group has established ESG policy, infrastructure, and framework for managing ESG related matters. The Board of Directors of the Company oversees the Group’s ESG strategy and reporting. ESG working groups which comprise management personnel across the business and applicable locations were established and directly reports to the Management on ESG matters. The Group assessed key ESG issues associated with the business and operations, prioritised the ESG issues that are most important to our business and stakeholders, and determined the scope and content of disclosure in this ESG Report. The Group also considered key factors including financial, sales volume, number of employees, number of high value machines and production hours contributions of each location to the Group. Based on the assessment result, emission data of the Group’s plants in Shenzhen, Shaoguan and Suzhou are included in this ESG disclosure because of their relative contributions of the abovementioned factors. This ESG report covers the performance of the Group in two subject areas, namely, Environmental and Social.

A. ENVIRONMENTAL

The Group continues to maintain ISO 14001:2015, a certification in environmental management system. The Group strives to minimise its environmental impacts by managing its energy consumption, use of resources and waste production. In particular:

- (1) The Group maintains its existing low emission operating model, and strive to reduce the resources consumed during production and improve energy efficiency;
- (2) The Group has established a mechanism to collect emission data to monitor the environmental impact of the Group’s operations; and
- (3) The Group has set up ESG working groups in applicable locations to monitor and report emission data on a regular basis.

A1. Emissions

With reference to the Reporting Guidance on Environmental Key Performance Indicators (“KPIs”) issued by the Stock Exchange, the Group has developed an Emission Assessment Form 《排放物評估表》. The Emission Assessment Form is used to assess the major emissions associated with the Group’s production and operations. If there were relevant changes to the Group’s production and operation, ESG working groups will re-evaluate and update the Emission Assessment Form. The Group also has the following measures to manage its overall emissions:

- (1) Monthly, Quality Control Department performs an internal review on environmental matters to ensure environmental protection measures in place are functioning as intended at each factory. The assessment results are recorded in the Environmental Operation Check List 《環境運行檢查記錄表》. Follow-up action may be performed, when deemed appropriate, if abnormalities are found. Annually, Corporate Social Compliance Department, Human Resources and Administration Department performs a comprehensive self-assessment on the overall effectiveness of the Environmental Management System (“EMS”).
- (2) Annually, a management review report summarizing internal and external environmental assessment results is prepared to report on environmental related matters. ESG working groups are responsible for the assessment of the respective factories and reporting the results to EMS Representatives 《環境管理系統管理者代表》. EMS Representatives are responsible for reviewing the assessment results, implementing remediation measures (if needed) and reporting the assessment results and remediation progress to Senior CSR Manager. Senior CSR Manager reviews and consolidates environmental related matters and reports to the Enterprise Development Committee of the Group.
- (3) Measure are implemented to manage emission, some key measures include:
 - Purifying waste gas and fumes generated from printing and post-printing finishing working area with air-filters and Volatile Organic Compounds (“VOCs”) disposal systems;
 - Purifying waste gas and fumes generated from the catering activities at the canteen with purification devices;
 - Recycling food waste as compost to reduce non-hazardous waste;

- Engaging qualified vendors to process non-hazardous waste to minimize impact to the environment;
- Processing wastewater in processing facilities established according to the local Environmental Protection Department's standard. A sewage discharge permit was obtained for discharging purified wastewater via regular sewage system; and
- Using electric forklifts instead of diesel-fuelled forklifts to reduce sulphur dioxide, carbon dioxide and methane emissions.

With the above measures, greenhouse gases emissions per HKD million of production value, in terms of carbon dioxide equivalent, maintained at around 30 tonnes over the past three reporting periods.

During the reporting period, the Group implemented the following initiatives to reduce the usage of both goods vehicles and passenger cars:

- (1) Reducing the delivery frequency by consolidating shipments;
- (2) Outsourcing a portion of goods deliveries from Shenzhen plant to external logistics companies to enable the retirement of aged diesel-fuelled goods vehicles, which were considered as relatively high-polluting; and
- (3) Encouraging employees to use public transportation.

As a result of these initiatives, Nitrogen Oxides, Sulphur Oxides, and Particulate Matters emissions per HKD million of production value in this reporting period have reduced from 1.57kg, 3.43g and 115.24g to 0.78kg, 2.54g and 57.88g, representing a decrease of 50%, 26% and 50%, respectively when compared with the previous reporting period.

With reference to the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal 《控制危險廢物越境轉移及其處置巴塞爾公約》 and the National Hazardous Wastes List 《國家危險廢物名錄》 (issued by the Ministry of Environmental Protection of the People's Republic of China), ESG working groups assessed whether the Group has produced any hazardous waste. Based on the assessment, the Group's hazardous waste produced mainly consists of sewage water from printing and washing of printing plate, ink cans, oil rags, and empty chemical cans.

The Group has implemented the following measures to manage its overall hazardous and non-hazardous waste disposal. Key measures include:

- (1) Engaging licensed hazardous waste collectors to collect and dispose of hazardous waste;
- (2) Keeping track of hazardous waste collection records, including the amount of hazardous waste disposed of;
- (3) Storing hazardous waste and wastewater in designated waste warehouses and wastewater collection tanks until they are collected by the licensed hazardous waste collectors to minimise the risk of unintentional discharge;
- (4) Engaging vendors to collect and recycle used paper;
- (5) Recycling food waste as compost to reduce non-hazardous waste;
- (6) Pre-configuring printers with default two-sided printing;
- (7) Digitalising internal documents to reduce the use of paper; and
- (8) Promoting reuse and recycle through the provision of recycling boxes in the office.

With the above measures, the average hazardous waste disposed of per HKD million of production value decreased to 0.27 tonnes in this reporting period compared to 0.43 tonnes in the previous reporting period.

Our management takes reasonable efforts to ensure our production complies with relevant environmental laws and regulations. Annually, ESG working groups update the List of Environmental Laws and Regulations 《環境法律法規清單》 to ensure applicable laws and regulations updates are made aware to the Group. ESG working groups pay attention to the relevant laws and regulations and perform assessment to ensure the Group's production and operations are in compliance.

During the reporting period, Management was not aware of any significant incidences of non-compliance with relevant laws and regulations, such as Water Pollution Prevention and Control Law of the People's Republic of China 《中華人民共和國污染防治法》 and Prevention and Control of Environmental Pollution by Solid Waste Law of the People's Republic of China 《中華人民共和國固體廢物污染環境防治法》 on the environment and natural resources relating to air and greenhouse gas emissions, discharges into water and land, and generation of hazardous and non-hazardous waste.

A2. Use of Resources

Major resources used by the Group are electricity, water, diesel and petrol fuel, and plastic and paper packaging materials. No issues in sourcing resources for operation were encountered by the Group during the reporting period. The Group has implemented various measures to manage use of resources. Key measures include:

- (1) Enhancing employees' awareness of energy saving and emission reduction;
- (2) Setting office air-conditioning systems at optimal temperature (at the 25 to 26 Degree Celsius range);
- (3) Pre-configuring printers with two-sided printing setting;
- (4) Digitalizing internal documents to reduce the use of paper;
- (5) Promoting reuse and recycle through the provision of recycling boxes in the office;
- (6) Switching-off lights during lunch and non-working hours;
- (7) Using energy saving light-emitting diode ("LED") lighting;
- (8) Recycling and reusing office supply and production materials where possible;
- (9) Re-using a proportion of wastewater from plants in production to reduce water usage; and
- (10) Comparing between actual and budgeted electricity and water consumption, and monitoring of related consumption trend.

With the above measures, average direct and indirect energy consumption per HKD million of production value maintained at approximate 58 MWh in this reporting period. On the other hand, water consumption per HKD million of production value increased 37% to 1,087.66 m³ in this reporting period when compared to 794.93 m³ in the previous reporting period. We believe this increase was mainly related to the water consumption by cooling towers for maintaining the required operating temperatures of our facilities attributed to:

- (1) The extended operating hours of cooling towers to cope with production requirement.
- (2) The rise of the average temperature experienced from the climate, which increased the use of water to achieve the same cooling effect.

During the reporting period, Management was not aware of any incidences of non-compliance with relevant laws and regulations, such as Energy Conservation Law of the People's Republic of China 《中華人民共和國節約能源法》 on the use of resources.

A3. The Environment and Natural Resources

To minimise the Group’s impact on environment and natural resources, the Group has established a set of environmental management system which was certified with ISO 14001: 2015 standard. ESG working groups have also been established in applicable locations of the Group to monitor environmental issues relating to production and operation.

Annually, the ESG working groups assess the Group’s production and operation to identify areas that have significant environment impact and summarise the result on the List of Significant Environmental Factors 《重大環境因素清單》. The Management then prioritises and designs respective action plans to control or remediate required areas. Responsible departments are assigned to the respective areas to monitor the implementation status of the action plans. In addition, the Group selects employees to participate in relevant environmental risk management training. Participating employees who passed the assessment are awarded with certificates.

Annually, a feasibility study on emission reduction initiatives is prepared to analyse the cost and benefit of such initiatives, and ESG working groups then records the relevant information on the Environmental Initiatives Control List 《環境管理方案控制表》 for management’s review and approval. During this reporting period, the Group has formulated six major emission reduction initiatives namely, prevention of fire accidents, chemical spills, and atmospheric pollution, and reduction of power consumption, water consumption, and office paper usage.

B. SOCIAL

The Group recognises its responsibility to maintain safe and ethical working conditions for our employees. The Group complies with various Codes of Conduct relevant to its business and operation and passes corresponding audits, including, ICTI Ethical Toy Program (“IETP”), Sedex Members Ethical Trade Audit (“SMETA”), Social and Environmental Accountability (“SEA”), Business Social Compliance Initiative (“BSCI”) and Responsible Business Alliance (“RBA”). We also maintain EcoVadis and Disney FAMA as evidence of our high standards in corporate management and human capital development.

Employment and Labour Practices

B1. Employment

The Group is committed to be an equal opportunity employer, respect cultural differences, promote gender equality, and comply with applicable labour standards and employment laws and regulations which are applicable to our business. The Group has developed comprehensive human resources policies and guidelines to govern recruitment, compensation, promotion and termination of our employees, and employees' working hours and rest periods, some key policies are as follows:

- Employee Handbook 《員工守則》
- Recruitment Procedures 《招聘程序》
- Promotion / Transfer Training Assessment Procedures 《晉升 / 轉崗培訓考核程序》
- Prohibition of Child Labour Recruitment Policy and the Remediation Procedures 《禁止招聘童工政策及補救程序》
- Prohibition of Force Labour and Prisoners Policy and Procedures 《禁止強迫勞工和囚工的政策及程序》

The Group strives to strictly comply with the employment laws and regulations relevant to the Group's business and operation. If there is any significant change to these laws and regulations, the General Manager of Human Resources and Administration Department will update the Group's policies reflecting the applicable updates. The laws and regulations that are directly related to the Group include, but may not be limited to, the following:

Hong Kong:

- Employment Ordinance 《僱傭條例》
- Sex Discrimination Ordinance 《性別歧視條例》
- Disability Discrimination Ordinance 《殘疾歧視條例》
- Family Status Discrimination Ordinance 《家庭崗位歧視條例》
- Racial Discrimination Ordinance 《種族歧視條例》

China:

- Labour Law of People's Republic of China 《中華人民共和國勞動法》
- Labour Contract Law of People's Republic of China 《中華人民共和國勞動合同法》
- Prohibition of Child Labour Provisions 《禁止使用童工規定》
- Underage Workers Special Protection Provisions 《未成年工特殊保護規定》
- Prohibition of Forced Labour and Prisoners Labour Policy and Procedures 《禁止強迫勞工和囚工的政策及程序》
- Female Workers Labor Protection Special Provisions 《女職工勞動保護特別規定》

During the reporting period, Management was not aware of any significant incidences of non-compliance with relevant laws and regulations as stated in this section on the employment and labour practices relating to compensation, recruitment and termination, promotion, working hours, rest periods, equal opportunity, diversity, anti-discrimination, and other benefits and welfare.

B2. Health and Safety

The Group strives to provide a healthy and safe working environment to our employees in all locations. Safety guidelines are stipulated in the Group's policies which are distributed to all employees. The Group has established policies to manage health and safety related matters, some key policies are as follows:

- Company Safety Management Policy 《公司安全管理政策文件》
- Safety Risk Assessment 《安全風險評估》
- Occupational Health Risk Assessment 《職業衛生風險評估》
- Contingency Plans 《應急預案一套》
- Operational Safety Procedures 《安全操作規程》

The Group strives to strictly comply with health and safety laws and regulations relevant to the Group's business and operation. If there is any significant change to these laws and regulations, the General Manager of Human Resources and Administration Department will update the Group's policies reflecting the applicable updates. The laws and regulations that are directly related to the Group include, but may not be limited to, the following:

Hong Kong:

- Occupational Safety and Health Council Ordinance 《職業安全健康局條例》

China:

- Labour Security Monitoring Regulation of Guangdong Province 《廣東省勞動保障監察條例》
- Social Insurance Law of People's Republic of China 《中華人民共和國社會保險法》
- Regulations on Work Injury Insurance 《工傷保險條例》
- Employee Non-work related Illness / Injury Medical Period 《企業職工患病或非因工負傷醫療期規定》
- Prevention and Treatment of Occupational Diseases Law of People's Republic of China 《中華人民共和國職業病防治法》

During the reporting period, Management was not aware of any incidences of non-compliance with relevant laws and regulations as stated in this section relating to the provision of a safe working environment and protection of employees from occupational hazards which were applicable to our business. Furthermore, no severe injuries or fatalities of the Group's employees were reported during the reporting period. To provide employees a favourable working environment, air-conditioners have been installed in production lines and staff quarters.

B3. Development and Training

The Group emphasises on the training and development of employees to meet the developmental needs of the Group. Training Management Policy 《培訓管理制度》 covers areas including pre-job training (three levels of safety training related to new hire orientation, production areas and on job duties), position transfer training, on-the-job training, external training, and special training. Key Position Training Assessment Procedures 《關鍵崗位培訓考核程序》 covers assessment on theoretical knowledge, practical skills, substitute / replacement for key positions. The Group also has established Promotion / Transfer Training Assessment Procedures 《晉升/轉崗培訓考核程序》 to regulate employee promotion and transfer procedures. Major areas covered by the Promotion / Transfer Training Assessment Procedures are summarised as follows:

- Conditions, principles, and approval authority for promotion / transfer
- Requirements for promotion / transfer of different positions
- Detailed promotion / transfer procedures
- Non-promotion or transfer salary adjustment application procedures
- Flow chart for promotion or transfer training

B4. Labour Standards

The Group is committed to comply with all applicable labour standards relevant to our business. The Group has established policies to strictly prohibit any child and forced labour. Our management personnel take all reasonable steps to set up and maintain a recruitment process to ensure there is no deviation from these policies. These policies are:

- Prohibition of Child Labour Recruitment Policy and Remediation Procedures 《禁止招聘童工政策及補救程序》
- Prohibition of Forced Labour and Prisoners Policy and Procedures 《禁止強迫勞工和囚工的政策及程序》

The Group strives to strictly comply with labour standards relevant to the Group's business and operation. If there is any significant change to these laws and regulations, the General Manager of Human Resources and Administration Department will update the Group policies reflecting the applicable updates. The laws and regulations that are directly related to the Group include, but may not be limited to, the following:

Hong Kong:

- Employment Ordinance 《僱傭條例》

China:

- Underage Workers Special Protection Provisions 《未成年工特殊保護規定》
- Prohibition of Child Labour Provisions 《禁止使用童工規定》
- Labour Law of People's Republic of China 《中華人民共和國勞動法》

During the reporting period, Management was not aware of any incidences of non-compliance with relevant laws and regulations as stated in this section relating to child and forced labour.

Operating Practices

B5. Supply Chain Management

To ensure product quality, the Group established guidelines and management measures to manage environmental and social risks related to supply chain, major measures are summarised as follows:

- (1) The Group established Guidelines for Supplier Quality Evaluation 《供應商品質評價工作指引》 to ensure supplier evaluation are regularly performed and the related documentation are retained for future decision-making references.
- (2) Purchasing Department prepares Supplier Account Opening / Evaluation Form 《供應商開戶/調查表》 to qualified supplier as an effort to document supplier information and relevant qualification. Purchasing Department performs supply evaluation via site assessment and sample checking, etc.
- (3) To check the suppliers' environmental, health and safety and social responsibility standards, Purchasing Department sends questionnaire or survey to suppliers to gather the suppliers' policy and information related to occupational health and safety, labour and employees and environmental protection practice.
- (4) The Group requires suppliers to sign the Supplier Social Responsibility Commitment 《供應商社會責任承諾書》, Supplier Agreement 《供應商承協書》 and Material Supply Conformity Declaration 《供應商物料符合性聲明》 of the Group.

B6. Product Responsibility

The Group recognises the importance of product responsibility. We continue to maintain ISO 9001:2015, a certification in quality management system. The Group has also established relevant policies to ensure compliance with applicable laws and regulations and to fulfil our obligations towards our customers. The laws and regulations that are directly related to the Group include, but may not be limited to, the following:

China:

- Technical Requirement for Environmental Labeling Products Culture Paper 《環境標誌產品技術要求:文化用紙》

European Union:

- Directive 2009/48/EC (Toy Safety Directive)
- Restriction of Hazardous Substances (“RoHS 2.0”) 2011/65/EU
- Regulation concerning Registration, Evaluation, Authorisation and Restriction of Chemicals (“REACH”)
- EN71-3:2019 (Toxic Elements Test)

United States:

- Standard Consumer Safety Specification for Toy Safety ASTM F963-16

The Group strives to uphold product responsibility through the following measures:

(1) Strict selection of supplier

The Group evaluates the quality and performance of the existing approved suppliers on a regular basis to ensure materials purchased by the Group meet the requirements.

(2) Customer satisfaction survey

Each year, the Group selects key customers to conduct surveys in order to understand customer’s satisfaction level towards the Group’s products and services, and to improve product quality based on the survey results.

(3) Major products of the Group

The main products of the Group are packaging materials including luxury packaging and specialty printing, children’s books, greeting cards and 3D wooden puzzle. Quality Control Department is responsible for keeping track of changes to product safety regulations. If there is any change in the relevant laws and regulations, Quality Control Department ensures the Group’s existing production procedures and product safety comply with the latest regulations and the Group’s requirements.

During the reporting period, Management was not aware of any significant incidences of non-compliance with relevant laws and regulations as stated in this section on product responsibility relating to health and safety, advertising, labelling and privacy matters relating to the products manufactured.

B7. Anti-corruption

The Group is committed to prevent unlawful acts such as bribery, extortion, fraud, and money laundering. The Group's Employee Handbook includes integrity and confidentiality standards to ensure the behaviours of employees are abide by laws and with proper business ethics and professional conducts. The Employee Handbook and internal policies are subject to periodic review and updates will be made to ensure compliance with the latest development of applicable laws and regulations. The Company has posted Anti-bribery Notice 《廉潔聲明牌》 in office areas and meeting rooms to remind employees of conducting business in the absence of any undue influences. If any activity associated with bribery is being discovered, the business transaction between the associated counter parties would be terminated. Employees engages in bribery activity will also be liable to disciplinary actions.

The laws and regulations that are directly related to the Group include, but may not be limited to, Corruption Punishment Ordinance of the People's Republic of China 《中華人民共和國懲治貪污條例》, Independent Commission Against Corruption Ordinance 《廉政公署條例》 and Prevention of Bribery Ordinance 《防止賄賂條例》. During the reporting period, Management was not aware of any significant incidences of non-compliance with relevant laws and regulations related to anti-corruption as stated in this section.

Community

B8. Community Investment

The Group takes into consideration the communities' interests to ensure the Group's business activities do not carry any negative impact to the community. All employees are encouraged to participate in community activities and charitable events as to contribute to the society. We work with a broad range of different charitable organisations, which work within the communities where we operate and beyond. Past charitable contributions include fund raising for natural disaster reliefs, as well as contributing funds to assist university students who were in financial need. We welcome ideas for new and fruitful collaborations with non-profit groups and organisations that are working to make our world a better place.

ESG Performance Data

Subject Area A: Environment				
Key Performance Indicator		2019/20	2018/19	Unit
Emissions from Gaseous Fuel Consumption and Vehicles	Total NO _x	299.72	770.17	kg
	NO _x per HKD million of production value	0.78	1.57	kg
	Total Sox	975.45	1,680.95	g
	SO _x per HKD million of production value	2.54	3.43	g
	Total Particulate Matter (PM)	22,249.92	56,507.65	g
	PM per HKD million of production value	57.88	115.24	g
GHG direct emissions, indirect emissions and removals	Total Carbon Dioxide equivalent (CO ₂ equivalent)	11,490.14	14,644.20	tonnes
	Total CO ₂ Removal	14.54	14.54	tonnes
	Net CO ₂ equivalent	11,475.61	14,629.66	tonnes
	CO ₂ equivalent per HKD million of production value	29.85	29.83	tonnes
Hazardous waste	Total hazardous waste	103.98	211.29	tonnes
	Hazardous waste per HKD million of production value	0.27	0.43	tonnes
Energy consumption	Total direct and indirect energy consumed	22,113,684.70	28,375,046.65	kWh
	Energy consumed per HKD million of production value	57,528.19	57,865.09	kWh
Water consumption	Total water consumed	418,092.00	389,807.00	m ³
	Water consumed per HKD million of production value	1,087.66	794.93	m ³
Packaging material	Total plastic material consumed	300,120,350.00	371,448,828.75	unit
	Plastic material consumed per HKD million of production value	780,755.54	757,493.75	unit
	Total Pit/Carton boxes consumed	6,847,712.00	6,758,725.00	unit
	Pit/Carton boxes consumed per HKD million of production value	17,814.15	13,783.03	unit
	Total Kraft paper consumed	71.26	88.93	tonnes
	Kraft paper consumed per HKD million of production value	0.19	0.18	tonnes

The following publications were made reference to for the calculation of specific emission KPIs:

1. *“Appendix 2: Report Guidance on Environmental KPIs” by the Hong Kong Exchanges and Clearing Limited;*
2. *“2006 Guidelines for National Greenhouse Gas Inventories Volume 2” by the Intergovernmental Panel on Climate Change;*
3. *“2011 and 2012 China Regional Grid Average Carbon Dioxide Emission Factor” 《2011年和 2012年中國區域電網平均二氧化碳排放因子》 by National Center for Climate Change Strategy and International Cooperation (NCSC) of the People’s Republic of China;*
4. *“Chinese Energy Statistical Yearbook 2018” by National Bureau of Statistics of the People’s Republic of China;*
and
5. *“GB Standards on diesel, gasoline and liquefied petroleum gases” by Standardization Administration of the People’s Republic of China.*

ESG Content Index

Subject Area A: Environment		
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Note 1: Non-hazardous waste generated by the Group are mostly paper waste and food waste. The Group has engaged qualified recycling vendors to recycle all paper waste while food waste is recycled as compost. Through these cycling measures, we believe that our production of non-hazardous waste shall not have significant impact to the environment and was not considered as part of the Group's major environmental matter.

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Aspect B8: Community Investment		
General Disclosure	Policies on community engagement to understand the needs of the communities where the issuer operates and to ensure its activities take into consideration the communities' interests.	Page 13