

Linking the GRI Standards and HKEX ESG reporting guide

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Introduction

Background on sustainability reporting

Through their activities and relationships, all organizations make positive and negative contributions towards the goal of sustainable development. Sustainability reporting is the practice by companies of reporting publicly on their economic, environmental and social impacts – and hence contributions – towards achieving this goal.

Sustainability reporting also makes good business sense. There is a wealth of evidence that investors evaluate how companies manage environmental, social and governance (ESG) risks and incorporate this information into their investment decision-making. Furthermore, businesses that engage in effective and transparent reporting can better understand the issues that their stakeholders care about most, and therefore how the firm creates value. This supports a virtuous circle of positive contribution and better performance.

As a result, sustainability reporting has become a mainstream business practice around the world. Almost three-quarters of N100 companies¹ now report on ESG factors, according to KPMG's 2017 Survey of Corporate Responsibility Reporting.² Of the world's largest companies – the G250 – 92% produce sustainability reports, with 74% of these referring to GRI.

Globally accepted standards, such as the GRI Standards, provide a common language and credible set of disclosures for any organization to communicate effectively about their impacts on the economy, the environment, and society.

Companies can combine their use of such reporting instruments to improve the quality and global comparability of information they disclose publicly. This enables better decision making by organizations and their stakeholders, helping build the long-term trust that is essential for the functioning of markets.

About this document

This document is designed to help companies use disclosures from the GRI Standards to meet the requirements of the Environmental, Social and Governance Reporting Guide set out in Appendix 27 of the Main Board Listing Rules and Appendix 20 of the GEM Listing Rules (ESG Reporting Guide) of Hong Kong Exchanges and Clearing Limited (HKEX).

The linkage tables show the GRI Standards and disclosures that relate to requirements in HKEX's ESG Reporting Guide. The information collected for these disclosures allows companies to create a sustainability report based on the GRI Standards at the same time as complying with HKEX's ESG Reporting Guide, without duplicating effort.

Note that the disclosures in the GRI Standards can have additional reporting requirements, recommendations, and/or guidance that relate to each disclosure. In order to claim that a sustainability report has been prepared in accordance with the GRI Standards, an organization is required to comply with all requirements that relate to the disclosures reported. See [GRI 101: Foundation](#) for more information.

By making use of both the GRI Standards and the HKEX's ESG Reporting Guide, a company can meet the growing demand for sustainability information, and be more transparent and accountable to its stakeholders, thereby increasing trust.

¹ An annual ranking by Fortune magazine of the 100 largest US public and privately-held companies, listed according to market capitalization or enterprise value.

² Available at www.kpmg.com/CN/en/IssuesAndInsights/ArticlesPublications/Documents/kpmg-survey-of-corporate-responsibility-reporting-2015-O-201511.pdf

About GRI and the GRI Standards

GRI™ is an independent international organization that has pioneered corporate sustainability reporting since 1997. GRI's mission is to empower decision-makers everywhere, through its standards and multi-stakeholder network, to take action towards a more sustainable economy and world.

The GRI Sustainability Reporting Standards (GRI Standards) are a set of modular reporting standards that can be used by any organization to report about its impacts on the economy, the environment, and society. The set includes three universal Standards applicable to all organizations: *GRI 101: Foundation*, *GRI 102: General Disclosures*, and *GRI 103: Management Approach*. In addition, there are 34 topic-specific Standards, organized into economic, environmental and social categories, which organizations can select from to report on their material topics. See [GRI 101: Foundation](#) for more information on how to use and reference the GRI Standards.

Preparing a sustainability report in accordance with the GRI Standards provides a full and balanced picture of an organization's material topics, the related impacts, and how these impacts are managed.

The GRI Standards are developed through a transparent, multi-stakeholder process and are issued by the Global Sustainability Standards Board (GSSB), an independent standard-setting body created by GRI.

Tens of thousands of organizations in more than 90 countries use the GRI Standards to report sustainability information. Use of the GRI Standards are also referenced or required in more than 160 policies over 60 countries and regions, including more than 20 stock exchanges worldwide.

The full set of GRI Standards can be downloaded at www.globalreporting.org/standards.

More information on the GRI Standards and the GSSB can be found on [GRI's website](#).



About Hong Kong Exchanges and Clearing Limited (HKEX) and HKEX ESG Reporting Guide

HKEX is a leading global operator of exchanges and clearing houses based in Hong Kong, Asia's premier international financial center, and one of the world's largest exchange groups by market capitalization.

The ESG Reporting Guide was initially launched by HKEX in 2012 as a voluntary guide. Following a market consultation in 2015, the ESG Reporting Guide was amended to mandate issuers to report on ESG matters on an annual basis and regarding the same period covered in their annual reports. The ESG Reporting Guide sets out general disclosures and key performance indicators (KPIs) in respect of different Aspects under the "Environmental" and "Social" subject areas for issuers to report on their ESG performance.

In May 2019, HKEX published a Consultation Paper to consult the market on further enhancements to the ESG Reporting Guide, which aimed to support and improve issuers' governance and disclosure of ESG activities and metrics. There was strong support for the proposals, and the changes take effect for financial years commencing on or after 1 July 2020.

Following the changes, the ESG Reporting Guide comprises;

- Mandatory disclosure requirements including (a) a board statement setting out the board's consideration of ESG matters; (b) application of Reporting Principles "materiality", "quantitative" and "consistency"; and (c) explanation of reporting boundaries of ESG reports; and
- "Comply or explain" provisions in respect of 12 Aspects under the "Environmental" and "Social" subject areas. Issuers are required to report on the provision, or provide considered reasons why information in respect of the provision has not been reported.

HKEX reviews the ESG Reporting Guide periodically to ensure that it remains fit for purpose, continues to promote quality ESG performance and reporting, and is up to date with investor and stakeholders expectations and international best practice.



Linking the GRI Standards and HKEX's ESG Reporting Guide

This document includes two tables which give an overview of how the GRI Standards and disclosures relate to requirements in HKEX's ESG Reporting Guide:

- **Summary linkage table**, which provides a high-level overview of the GRI Standards and disclosures relate to each section or requirement from the ESG Reporting Guide.
- **Comprehensive linkage table**, which provides additional information that supports and expands on the linkages between the ESG Reporting Guide and the GRI Standards.

Please note that *GRI 103: Management Approach* is designed to be used together with the topic-specific GRI Standards (200, 300, and 400 series) to report the organization's management approach for a material topic. Therefore, *GRI 103: Management Approach* is referenced together with the topic-specific Standards that relate to a given requirement from the ESG Reporting Guide.

These tables reference the latest versions of the GRI Standards as of July 2020.

Summary linkage table

This table provides a high-level overview of the GRI Standards and disclosures that relate to relevant sections or requirements from the ESG Reporting Guide.

HKEX ESG Reporting Guide	GRI Standards and Disclosures
Overall Approach: para 7	<p>GRI 101: Foundation:</p> <ul style="list-style-type: none"> • Clause 1.1 (Stakeholder Inclusiveness principle) • Clause 1.3 (Materiality principle) • Clause 2.1 (Applying the Reporting Principles) <p>GRI 102: General Disclosures: Disclosures 102-40, 102-42, 102-43, and 102-44</p>
Overall Approach: para 8	<p>GRI 101: Foundation:</p> <ul style="list-style-type: none"> • Clause 2.3.1 (Identifying material topics and their Boundaries) • Clause 2.5.3 (Reporting on material topics)
Overall Approach: para 9	GRI 102: General Disclosures: Disclosure 102-56
Overall Approach: para 10	GRI 102: General Disclosures: Disclosures 102-26 and 102-32
Reporting Principles: para 11	<p>GRI 101: Foundation:</p> <ul style="list-style-type: none"> • Clause 1.3 (Materiality principle) • Clause 1.6 (Balance principle) • Clause 1.8 (Comparability principle)
Part B: Mandatory Disclosure Requirements	
Governance structure 13	<p>GRI 102: General Disclosures: Disclosures 102-14, 102-15, 102-29, 102-30, and 102-31</p> <p>GRI 103 Management Approach: Disclosure 103-1, 103-2, and 103-3</p>
Reporting Principles 14	<p>GRI 102: General Disclosures: Disclosure 102-40, 102-42, 102-43, 102-44, 102-47</p> <p>GRI 101: Foundation: Clause 1.8 (Comparability principle)</p>

HKEX ESG Reporting Guide	GRI Standards and Disclosures
Reporting Boundary 15	GRI 102: General Disclosures: Disclosure 102-45 and 102-49
Part C: “Comply or explain” Provisions	
Aspect A1 Emissions: General Disclosure	GRI 103: Management Approach: Disclosure 103-2 (c-i) (used together with GRI 305: Emissions, and GRI 306: Effluents and Waste) GRI 305: Emissions: Management approach disclosures guidance GRI 307: Environmental Compliance: Disclosure 307-1
KPI A1.1	GRI 305: Emissions: Disclosures 305-1, 305-2, 305-3, 305-6, and 305-7
KPI A1.2	GRI 305: Emissions: Disclosures 305-1, 305-2, 305-4
KPI A1.3	GRI 306: Waste: Disclosure 306-3 (a)
KPI A1.4	GRI 306: Waste: Disclosure 306-3 (a)
KPI A1.5	GRI 103: Management Approach: Disclosure 103-2 (used together with GRI 305: Emissions) GRI 305: Emissions: Clause 1.2 and Disclosure 305-5
KPI A1.6	GRI 103: Management Approach: Disclosure 103-2 (used together with GRI 306: Waste) GRI 306: Waste: Disclosures 306-4 and 306-5
Aspect A2 Use of Resources: General Disclosure	GRI 103: Management Approach: Disclosure 103-2 (c-i) (used together with GRI 301: Materials, GRI 302: Energy, and GRI 303: Water and Effluents)
KPI A2.1	GRI 302: Energy: Disclosures 302-1 and 302-3
KPI A2.2	GRI 303: Water and Effluents: Disclosure 303-5
KPI A2.3	GRI 103: Management Approach: Disclosure 103-2 (used together with GRI 302: Energy) GRI 302: Energy: Disclosures 302-4 and 302-5
KPI A2.4	GRI 103: Management Approach: Disclosure 103-2 (used together with GRI 303: Water and Effluents) GRI 303: Water and Effluents: Disclosure 303-1
KPI A2.5	GRI 301: Materials: Disclosure 301-1
Aspect A3 The Environment and Natural Resources: General Disclosure	GRI 103: Management Approach: Disclosure 103-2 (c-i) (used together with GRI 301: Materials, GRI 302: Energy, GRI 303: Water and Effluents, GRI 304: Biodiversity, GRI 305: Emissions, and GRI 306: Waste)
KPI A3.1	GRI 103: Management Approach: Disclosures 103-1 and 103-2 (used together with GRI 301: Materials, GRI 302: Energy, GRI 303: Water and Effluents, GRI 304: Biodiversity, GRI 305: Emissions, and GRI 306: Waste) GRI 303: Water and Effluents: Disclosure 303-1 GRI 304: Biodiversity: Disclosure 304-2 GRI 306: Waste: Disclosures 306-1 and 306-2
Aspect A4 Climate Change: General Disclosure	GRI 103: management approach: Disclosure 103-2 (c-i) (used together with GRI 201: Economic Performance) GRI 102: General Disclosures: Disclosure 102-29
KPI A4.1	GRI 201: Economic Performance: Disclosure 201-2
Aspect B1 Employment: General Disclosure	GRI 103: Management Approach: Disclosure 103-2 (c-i) (used together with GRI 202: Market Presence, GRI 401: Employment, GRI 405: Diversity and Equal Opportunity, GRI 406: Non-discrimination) GRI 419: Socioeconomic Compliance: Disclosure 419-1

HKEX ESG Reporting Guide	GRI Standards and Disclosures
KPI B1.1	GRI 102: General Disclosures: Disclosures 102-8 (a), 102-8 (b), and 102-8 (c) GRI 405: Diversity and Equal Opportunity: Disclosure 405-1(b)
KPI B1.2	GRI 401: Employment: Disclosure 401-1 (b)
Aspect B2 Health and Safety: General Disclosure	GRI 103: Management Approach: Disclosure 103-2 (c-i) (used together with <i>GRI 403: Occupational Health and Safety</i>) GRI 403: Occupational Health and Safety: Disclosure 403-1 GRI 419: Socioeconomic Compliance: Disclosure 419-1
KPI B2.1	GRI 403: Occupational Health and Safety: Disclosure 403-9, 403-10
KPI B2.2	Not directly covered by the GRI Standards – see comments in the Comprehensive linkage table
KPI B2.3	GRI 103: Management Approach: Disclosure 103-2 and 103-3 (a-i) (used together with <i>GRI 403: Occupational Health and Safety</i>) GRI 403: Occupational Health and Safety: Disclosures 403-1, 403-3, 403-5, 403-7
Aspect B3 Development and Training: General Disclosure	GRI 103: Management Approach: Disclosure 103-2 (c-i) (used together with <i>GRI 404: Training and Education</i>) GRI 404: Training and Education: Disclosure 404-2 (a)
KPI B3.1	Not directly covered by the GRI Standards – see comments in the Comprehensive linkage table
KPI B3.2	GRI 404: Training and Education: Disclosure 404-1
Aspect B4 Labour Standards: General Disclosure	GRI 103: Management Approach: Disclosure 103-2 (c-i) (used together with <i>GRI 408: Child Labor and GRI 409: Forced or Compulsory Labor</i>) GRI 419: Socioeconomic Compliance: Disclosure 419-1
KPI B4.1	GRI 103: Management Approach: Disclosure 103-2 (used together with <i>GRI 408: Child Labor and GRI 409: Forced or Compulsory Labor</i>) GRI 408: Child Labor: Disclosure 408-1(c) GRI 409: Forced or Compulsory Labor: Disclosure 409-1(b)
KPI B4.2	GRI 103: Management Approach: Disclosure 103-2 (used together with <i>GRI 408: Child Labor and GRI 409: Forced or Compulsory Labor</i>) GRI 408: Child Labor: Disclosure 408-1(c) GRI 409: Forced or Compulsory Labor: Disclosure 409-1(b)
Aspect B5 Supply Chain Management: General Disclosure	GRI 103: Management Approach: Disclosure 103-2 (c-i) (used together with <i>GRI 308: Supplier Environmental Assessment and GRI 414: Supplier Social Assessment</i>)
KPI B5.1	GRI 102: General Disclosures: Disclosure 102-9
KPI B5.2	GRI 102: General Disclosures: Disclosure 102-9 GRI 103: Management Approach: Disclosure 103-2 (used together with <i>GRI 303: Water and Effluents, GRI 308: Supplier Environmental Assessment and GRI 414: Supplier Social Assessment</i>) GRI 303: Water and Effluents: Disclosure 303-1 (c) GRI 308: Supplier Environmental Assessment: Disclosures 308-1 and 308-2 GRI 414: Supplier Social Assessment: Disclosures 414-1 and 414-2
KPI B5.3	GRI 102: General Disclosures: Disclosure 102-9 GRI 103: Management Approach: Disclosure 103-2 (used together with <i>GRI 303: Water and Effluents, GRI 308: Supplier Environmental Assessment and GRI 414: Supplier Social Assessment</i>) GRI 303: Water and Effluents: Disclosure 303-1 (c) GRI 308: Supplier Environmental Assessment: Disclosures 308-1 and 308-2 GRI 414: Supplier Social Assessment: Disclosures 414-1 and 414-2

HKEX ESG Reporting Guide	GRI Standards and Disclosures
KPI B5.4	GRI 103: Management Approach: Disclosure 103-2 (used together with GRI 306: Waste and GRI 308: Supplier Environmental Assessment)
Aspect B6 Product Responsibility: General Disclosure	GRI 103: Management Approach: Disclosure 103-2 (c-i) (used together with GRI 416: Customer Health and Safety , GRI 417: Marketing and Labeling , and GRI 418: Customer Privacy) GRI 416: Customer Health and Safety: Disclosure 416-2 GRI 417: Marketing and Labeling: Disclosures 417-2 and 417-3 GRI 418: Customer Privacy: Disclosure 418-1 GRI 419: Socioeconomic Compliance: Disclosure 419-1
KPI B6.1	Not covered by the GRI Standards
KPI B6.2	GRI 102: General Disclosures: Disclosures 102-43 and 102-44 GRI 103: Management Approach: Disclosure 103-2 (c-vi) GRI 418: Customer Privacy: Disclosure 418-1
KPI B6.3	Not covered by the GRI Standards
KPI B6.4	Not covered by the GRI Standards
KPI B6.5	GRI 103: Management Approach: Disclosures 103-2 and 103-3 (a-i) (used together with GRI 418: Customer Privacy)
Aspect B7 Anti-corruption: General Disclosure	GRI 103: Management Approach: Disclosure 103-2 (c-i) (used together with GRI 205: Anti-corruption) GRI 205 Anti-corruption: Disclosure 205-3 GRI 419: Socioeconomic Compliance: Disclosure 419-1
KPI B7.1	GRI 205: Anti-corruption: Disclosure 205-3
KPI B7.2	GRI 102: General Disclosures: Disclosure 102-17 GRI 103: Management Approach: Disclosures 103-2 and 103-3 (a-i) (used together with GRI 205: Anti-corruption) GRI 205: Anti-corruption: Clause 1.2
KPI B7.3	GRI 205: Anti-corruption: Disclosure: 205-2: Communication and training about anti-corruption policies and procedures
Aspect B8 Community Investment: General Disclosure	GRI 103: Management Approach: Disclosure 103-2 (c-i) (used together with GRI 413: Local Communities)
KPI B8.1	GRI 203: Indirect Economic Impacts: Disclosure 203-1(a)
KPI B8.2	GRI 201: Economic Performance: Disclosure 201-1(a-ii)

Comprehensive linkage table

This table provides additional information that supports and expands on the linkages between the ESG Reporting Guide and the GRI Standards.

HKEX ESG Reporting Guide	GRI Standards and Disclosures	Comments (where applicable)
<p>Overall approach: para 7 7. In addition to the “comply or explain” matters set out in this Guide, the Exchange encourages an issuer to identify and disclose additional ESG issues and KPIs that reflect the issuer’s significant environmental and social impacts; or substantially influence the assessments and decisions of stakeholders. In assessing these matters the issuer should engage stakeholders on an ongoing basis in order to understand their views and better meet their expectations.</p>	<p>GRI 101: Foundation</p> <p>Stakeholder Inclusiveness principle <i>1.1 The reporting organization shall identify its stakeholders, and explain how it has responded to their reasonable expectations and interests.</i></p> <p>Materiality principle <i>1.3 The report shall cover topics that:</i></p> <p style="padding-left: 20px;"><i>1.3.1 reflect the reporting organization’s significant economic, environmental, and social impacts; or</i></p> <p style="padding-left: 20px;"><i>1.3.2 substantively influence the assessments and decisions of stakeholders.</i></p> <p>Applying the Reporting Principles <i>2.1 The reporting organization shall apply all Reporting Principles from Section 1 to define report content and quality.</i></p> <p>GRI 102: General Disclosures</p> <p>Disclosure 102-40 List of stakeholder groups</p> <p>Disclosure 102-42 Identifying and selecting stakeholders</p> <p>Disclosure 102-43 Approach to stakeholder engagement</p> <p>Disclosure 102-44 Key topics and concerns raised</p>	

HKEX ESG Reporting Guide	GRI Standards and Disclosures	Comments (where applicable)
<p>Overall approach: para 8 8. This Guide is not comprehensive and the issuer may refer to existing international ESG reporting guidance for its relevant industry or sector. The issuer may adopt international ESG reporting guidance so long as it includes comparable disclosure provisions to the “comply or explain” provisions set out in this Guide.</p>	<p>GRI 101: Foundation</p> <p>Identifying material topics and their Boundaries</p> <p>2.3.1 <i>The reporting organization should consult the GRI Sector Disclosures that relate to its sector, if available, to assist with identifying its material topics.</i></p> <p>Reporting on material topics</p> <p>2.5.3 <i>For each material topic, the reporting organization should report other appropriate disclosures, if the material topic is not covered by an existing GRI Standard.</i></p>	<p>Note that in <i>GRI 101: Foundation</i>, clauses 2.3.1 and 2.5.3 are recommendations (indicated by the word ‘should’ in the text).</p> <p>Complying with these clauses is encouraged, but is not required in order to prepare a report in accordance with the GRI Standards.</p>
<p>Overall Approach: para 9 The issuer may seek independent assurance to strengthen the credibility of the ESG information disclosed. Where independent assurance is obtained, the issues should describe the level, scope and processes adopted for the assurance given clearly in the ESG report.</p>	<p>GRI 102: General Disclosures</p> <p>Disclosure 102-56 External assurance</p>	
<p>Overall Approach: para 10 10. The board has overall responsibility for an issuer’s ESG strategy and reporting.</p>	<p>GRI 102: General Disclosures</p> <p>Disclosure 102-26 Role of the highest governance body in setting purpose, values, and strategy</p> <p>Disclosure 102-32 Highest governance body’s role in sustainability reporting</p>	
<p>Reporting Principles: para 11 11. The following principles underpin the preparation of an ESG report, informing the content of the report and how information is presented. An issuer should follow these Reporting Principles in the preparation of an ESG report:</p> <p>Materiality: The threshold at which ESG issues determined by the board are sufficiently important to investors and other stakeholders that they should be reported.</p> <p style="text-align: right;"><i>Continues on next page »</i></p>	<p>GRI 101: Foundation</p> <p>Materiality principle</p> <p>1.3 <i>The report shall cover topics that:</i></p> <p>1.3.1 <i>reflect the reporting organization’s significant economic, environmental, and social impacts; or</i></p> <p>1.3.2 <i>substantively influence the assessments and decisions of stakeholders.</i></p> <p style="text-align: right;"><i>Continues on next page »</i></p>	

HKEX ESG Reporting Guide	GRI Standards and Disclosures	Comments (where applicable)
<p style="text-align: center;">» <i>Continues from previous page</i></p> <p>Quantitative: KPIs in respect of historical data need to be measurable. The issuer should set targets (which may be actual numerical figures or directional, forward-looking statements) to reduce a particular impact. In this way the effectiveness of ESG policies and management systems can be evaluated and validated. Quantitative information should be accompanied by a narrative, explaining its purpose, impacts, and giving comparative data where appropriate.</p> <p>Balance: The ESG report should provide an unbiased picture of the issuer's performance. The report should avoid selections, omissions, or presentation formats that may inappropriately influence a decision or judgment by the report reader.</p> <p>Consistency: The issuer should use consistent methodologies to allow for meaningful comparisons of ESG data over time.</p>	<p style="text-align: center;">» <i>Continues from previous page</i></p> <p>Balance principle</p> <p>1.6 <i>The reported information shall reflect positive and negative aspects of the reporting organization's performance to enable a reasoned assessment of overall performance.</i></p> <p>Comparability principle</p> <p>1.8 <i>The reporting organization shall select, compile, and report information consistently. The reported information shall be presented in a manner that enables stakeholders to analyze changes in the organization's performance over time, and that could support analysis relative to other organizations.</i></p>	
<p>Part B: Mandatory Disclosure Requirements</p>		
<p>Governance Structure</p> <p>13. A statement from the board containing the following elements:</p> <p>(i) a disclosure of the board's oversight of ESG issues;</p> <p>(ii) the board's ESG management approach and strategy, including the process used to evaluate, prioritise and manage material ESG-related issues (including risks to the issuer's businesses); and</p> <p>(iii) how the board reviews progress made against ESG-related goals and targets with an explanation of how they relate to the issuer's businesses.</p>	<p>GRI 102: General Disclosures</p> <p>Disclosure 102-14 Statement from senior decision-maker</p> <p>Disclosure 102-15 Key impacts, risks, and opportunities</p> <p>Disclosure 102-29 Identifying and managing economic, environmental, and social impacts</p> <p>Disclosure 102-30 Effectiveness of risk management processes</p> <p>Disclosure 102-31 Review of economic, environmental, and social topics</p> <p style="text-align: right;"><i>Continues on next page »</i></p>	

HKEX ESG Reporting Guide	GRI Standards and Disclosures	Comments (where applicable)
	<p style="text-align: center;">» <i>Continues from previous page</i></p> <p>GRI 103: Management Approach, to be used together with any material topic</p> <p>Disclosure 103-1 Explanation of the material topic and its Boundary</p> <p>Disclosure 103-2 The management approach and its components</p> <p>Disclosure 103-3 Evaluation of the management approach</p>	
<p>Reporting Principles 14. A description of, or an explanation on, the application of the following Reporting Principles in the preparation of the ESG report:</p> <p>Materiality: The ESG report should disclose: (i) the process to identify and the criteria for the selection of material ESG factors; (ii) if a stakeholder engagement is conducted, a description of significant stakeholders identified, and the process and results of the issuer's stakeholder engagement.</p> <p>Quantitative: Information on the standards, methodologies, assumptions and/or calculation tools used, and source of conversion factors used, for reporting of emissions/energy consumption (where applicable) should be disclosed.</p> <p>Consistency: The issuer should disclose in the ESG report any changes to the methods or KPIs used, or any other relevant factors affecting a meaningful comparison.</p>	<p>GRI 102: General Disclosures</p> <p>Disclosure 102-40 List of stakeholder groups</p> <p>Disclosure 102-42 Identifying and selecting stakeholders</p> <p>Disclosure 102-43 Approach to stakeholder engagement</p> <p>Disclosure 102-44 Key topics and concerns raised</p> <p>Disclosure 102-47 List of material topics</p> <p>GRI 101: Foundation</p> <p>Comparability principle <i>1.8 The reporting organization shall select, compile, and report information consistently. The reported information shall be presented in a manner that enables stakeholders to analyze changes in the organization's performance over time, and that could support analysis relative to other organizations.</i></p>	<p>Disclosure 102-47 guidance states that material topics are those that an organization has prioritized for inclusion in the report. This prioritization exercise is carried out using the Stakeholder Inclusiveness and the Materiality principles. The Materiality principle identifies material topics based on the following two dimensions:</p> <ul style="list-style-type: none"> • The significance of the organization's economic, environmental, and social impacts; • Their substantive influence on the assessments and decisions of stakeholders
<p>Reporting Boundary 15. A narrative explaining the reporting boundaries of the ESG report and describing the process used to identify which entities or operation are included in the ESG report. If there is a change in the scope, the issuers should explain the difference and reason for the change.</p>	<p>GRI 102: General Disclosures</p> <p>Disclosure 102-45 Entities included in the consolidated financial statements</p> <p>Disclosure 102-49 Changes in reporting</p>	

HKEX ESG Reporting Guide	GRI Standards and Disclosures	Comments (where applicable)
Part C: “Comply or explain” Provisions		
<p>Aspect A1 Emissions: General Disclosure Information on:</p> <p>(a) the policies; and</p> <p>(b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to air and greenhouse gas emissions, discharges into water and land, and generation of hazardous and non-hazardous waste.</p> <p><i>Note: Air emissions include NO_x, SO_x, and other pollutants regulated under national laws and regulations.</i></p> <p><i>Greenhouse gases include carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons and sulphur hexafluoride.</i></p> <p><i>Hazardous wastes are those defined by national regulations.</i></p>	<p>GRI 103: Management Approach, to be used together with:</p> <ul style="list-style-type: none"> • GRI 305: Emissions • GRI 306: Waste <p>Disclosure 103-2 (c-i) The management approach and its components</p> <p>c. <i>A description of the following, if the management approach includes that component:</i></p> <p>i. <i>Policies</i></p> <p>GRI 305: Emissions</p> <p>Management approach disclosures Guidance <i>[When reporting its management approach for emissions, the reporting organization can also:</i></p> <ul style="list-style-type: none"> • <i>explain whether it is subject to any country, regional, or industry-level emissions regulations and policies; and provide examples of these regulations and policies]</i> <p>GRI 307: Environmental Compliance</p> <p>Disclosure 307-1 Non-compliance with environmental laws and regulations</p>	<p>General disclosure (a) on policies and general disclosure (b) on compliance can be reported as part of Disclosure 103-2 (c-i) of GRI 103: Management Approach, when used together with:</p> <ul style="list-style-type: none"> • GRI 305: Emissions; • GRI 306: Waste <p>Disclosure 307-1 of GRI 307: Environmental Compliance can be used to report against General Disclosure (b) on compliance with relevant laws and regulations.</p>
<p>KPI A1.1 The types of emissions and respective emissions data.</p>	<p>GRI 305: Emissions</p> <p>Disclosure 305-1 Direct (Scope 1) GHG emissions</p> <p>Disclosure 305-2 Energy indirect (Scope 2) GHG emissions</p> <p>Disclosure 305-3 Other indirect (Scope 3) GHG emissions</p> <p>Disclosure 305-6 Emissions of ozone-depleting substances (ODS)</p> <p>Disclosure 305-7 Nitrogen oxides (NO_x), sulfur oxides (SO_x), and other significant air emissions</p>	<p>KPI A1.1 can be reported as part of Disclosures 305-1, 305-2, 305-3, 305-6, and 305-7 in GRI 305: Emissions.</p>

HKEX ESG Reporting Guide	GRI Standards and Disclosures	Comments (where applicable)
<p>KPI A1.2 Direct (Scope 1) and energy indirect (Scope 2) greenhouse gas emissions (in tonnes) and where appropriate, intensity (e.g. per unit of production volume, per facility).</p>	<p>GRI 305: Emissions</p> <p>Disclosure 305-1 Direct (Scope 1) GHG emissions</p> <p>Disclosure 305-2 Energy indirect (Scope 2) GHG emissions</p> <p>Disclosure 305-4 GHG emissions intensity</p>	<p>KPI A1.2 can be reported as part of Disclosures 305-1, 305-2, and 305-4 in GRI 305: Emissions.</p> <p>In both ESG Reporting Guide and the GRI Standards, organizations can choose the most appropriate ratio denominator to calculate the intensity ratio.</p> <p>ESG Reporting Guide requests data to be reported in tonnes, whereas the GRI Standards require GHG emissions data to be reported in metric tons of CO₂ equivalent.</p>
<p>KPI A1.3 Total hazardous waste produced (in tonnes) and, where appropriate, intensity (e.g. per unit of production volume, per facility).</p>	<p>GRI 306: Waste</p> <p>Disclosure 306-3 (a) Waste by type and disposal method</p> <p>Waste generated</p> <p><i>a. Total weight of waste generated in metric tons, and a breakdown of this total by composition of the waste.</i></p> <p>Guidance [When reporting composition of the waste, the organization can describe:</p> <ul style="list-style-type: none"> • the type of waste, such as hazardous waste or non-hazardous waste] 	<p>KPI A1.3 requests data to be reported in tonnes, whereas Disclosure 306-3 (a) requires waste data to be reported in metric tons.</p> <p>The GRI Standards do not request the hazardous waste intensity.</p>
<p>KPI A1.4 Total non-hazardous waste produced (in tonnes) and, where appropriate, intensity (e.g. per unit of production volume, per facility).</p>	<p>GRI 306: Waste</p> <p>Disclosure 306-3 (a) Waste generated</p> <p><i>a. Total weight of waste generated in metric tons, and a breakdown of this total by composition of the waste.</i></p> <p>Guidance [When reporting composition of the waste, the organization can describe:</p> <ul style="list-style-type: none"> • the type of waste, such as hazardous waste or non-hazardous waste] 	<p>KPI A1.4 requests data to be reported in tonnes, whereas Disclosure 306-3 (a) requires waste data to be reported in metric tons.</p> <p>The GRI Standards do not request the hazardous waste intensity.</p>

HKEX ESG Reporting Guide	GRI Standards and Disclosures	Comments (where applicable)
<p>KPI A1.5 Description of emissions target(s) set and steps taken to achieve them.</p>	<p>GRI 103: Management Approach, to be used together with GRI 305: Emissions</p> <p>Disclosure 103-2 The management approach and its components</p> <p>GRI 305: Emissions</p> <p>Management approach disclosures</p> <p>1.2 <i>When reporting on GHG emissions targets, the reporting organization shall explain whether offsets were used to meet the targets, including the type, amount, criteria or scheme of which the offsets are part.</i></p> <p>Disclosure 305-5 Reduction of GHG emissions</p>	<p>The description of measures to mitigate emissions can be reported as part of Disclosure 103-2 of <i>GRI 103: Management Approach</i>, when used together with <i>GRI 305: Emissions</i>.</p> <p>Emission offsets have to be reported as part of clause 1.2 in the management approach disclosures of <i>GRI 305: Emissions</i>.</p> <p>The results achieved can be reported as part of Disclosure 305-5 of <i>GRI 305: Emissions</i>.</p>
<p>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.</p>	<p>GRI 103: Management Approach, to be used together with GRI 306: Waste</p> <p>Disclosure 103-2 The management approach and its components</p> <p>GRI 306: Waste</p> <p>Disclosure 306-4 Waste diverted from disposal</p> <p>Disclosure 306-5 Waste directed to disposal</p>	<p>The description of how hazardous and non-hazardous wastes are handled and the reduction targets can be reported as part of Disclosure 103-2 of <i>GRI 103: Management Approach</i>, when used together with <i>GRI 306: Waste</i>.</p> <p>Disclosures 306-4 and 306-5 of <i>GRI 306: Waste</i> cover both hazardous and non-hazardous waste.</p>
<p>Aspect A2 Use of Resources: General Disclosure Policies on the efficient use of resources, including energy, water and other raw materials.</p> <p><i>Note: Resources may be used in production, in storage, transportation, in buildings, electronic equipment, etc.</i></p>	<p>GRI 103: Management Approach, to be used together with</p> <ul style="list-style-type: none"> • GRI 301: Materials • GRI 302: Energy • GRI 303: Water and Effluents <p>Disclosure 103-2 (c-i) The management approach and its components</p> <p>c. <i>A description of the following, if the management approach includes that component:</i></p> <p>i. <i>Policies</i></p>	<p>Aspect A2 can be reported using Disclosure 103-2 (c-i) Disclosure 103-2 of <i>GRI 103: Management Approach</i>, when used together with:</p> <ul style="list-style-type: none"> • <i>GRI 301: Materials</i> • <i>GRI 302: Energy</i> • <i>GRI 303: Water and Effluents</i> <p><i>GRI 302: Energy</i> also provides additional guidance to report the management approach for energy, which specifically relates to policies: <i>When reporting its management approach for energy, the reporting organization can also explain whether it is subject to any country, regional, or industry-level energy regulations and policies. Additionally, it can provide examples of these regulations and policies.</i></p>

HKEX ESG Reporting Guide	GRI Standards and Disclosures	Comments (where applicable)
<p>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).</p>	<p>GRI 302: Energy</p> <p>Disclosure 302-1 Energy consumption within the organization</p> <p>Disclosure 302-3 Energy intensity</p>	<p>KPI A2.1 can be reported as part of Disclosures 302-1 and 302-3 of <i>GRI 302: Energy</i>.</p> <p>Disclosure 302-1 covers energy consumption within the organization (fuel, electricity, heating, cooling and steam). This includes energy produced by the organization itself (self-generated) or energy purchased from sources external to the organization. This equals Scope 1 and Scope 2 in the GHG Protocol.</p> <p>In both the ESG Reporting Guide and the GRI Standards, organizations can choose the most appropriate ratio denominator to calculate the intensity ratio.</p> <p>The ESG Reporting Guide requests data to be reported in kWh in thousands. The GRI Standards require energy consumption data to be reported in joules or multiples. Electricity, heating, cooling and steam are required to be reported in joules, watt-hours or multiples.</p>
<p>KPI A2.2 Water consumption in total and intensity (e.g. per unit of production volume, per facility).</p>	<p>GRI 303: Water and Effluents</p> <p>Disclosure 303-5 Water consumption</p>	<p>Disclosure 303-5 requires disclosure of water consumption in total megaliters. It does not require disclosure of water intensity.</p>
<p>KPI A2.3 Description of energy use efficiency target(s) set and steps taken to achieve them.</p>	<p>GRI 103: Management Approach, to be used together with GRI 302: Energy</p> <p>Disclosure 103-2 The management approach and its components</p> <p>GRI 302: Energy</p> <p>Disclosure 302-4 Reduction of energy consumption</p> <p>Disclosure 302-5 Reduction in energy requirements of products and services</p>	<p>The description of energy use targets can be reported as part of Disclosure 103-2 of <i>GRI 103: Management Approach</i>, when used together with <i>GRI 302: Energy</i>.</p> <p>The GRI Standards require energy consumption data to be reported in joules or multiples.</p>

HKEX ESG Reporting Guide	GRI Standards and Disclosures	Comments (where applicable)
<p>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</p>	<p>GRI 103: Management Approach, to be used together with GRI 303: Water and Effluents</p> <p>Disclosure 103-2 The management approach and its components</p> <p>GRI 303: Water and Effluents</p> <p>Disclosure 303-1 Interaction with water as a shared resource</p>	<p>The description of water efficiency targets and issues in sourcing water can be reported as part of Disclosure 103-2 of <i>GRI 103: Management Approach</i>, when used together with <i>GRI 303: Water and Effluents</i>.</p> <p>Disclosure 303-1(d) asks for an explanation of the process for setting water-related targets.</p>
<p>KPI A2.5 Total packaging material used for finished products (in tonnes) and, if applicable, with reference to per unit produced.</p>	<p>GRI 301: Materials</p> <p>Disclosure 301-1 Materials used by weight or volume</p>	<p>KPI A2.5 can be used as input for Disclosure 301-1 of <i>GRI 301: Materials</i>. Disclosure 301-1 requires the total weight or volume of materials that are used to produce and package the organization's primary products and services combined (one total materials figure). GRI reporters are required to break this figure down by non-renewable materials used and renewable materials used.</p> <p>KPI A2.5 requests data to be reported in tonnes, whereas Disclosure 301-1 does not specify a unit of measurement.</p> <p>The GRI Standards do not require data to be reported with reference to "per unit produced".</p>
<p>Aspect A3: The Environmental and Natural Resources: General Disclosure Policies on minimising the issuer's significant impacts on the environment and natural resources.</p>	<p>GRI 103: Management Approach, to be used together with:</p> <ul style="list-style-type: none"> • GRI 301: Materials • GRI 302: Energy • GRI 303: Water and Effluents • GRI 304: Biodiversity • GRI 305: Emissions • GRI 306: Waste <p>Disclosure 103-2 (c-i) The management approach and its components</p> <p>c. <i>A description of the following, if the management approach includes that component:</i></p> <p>i. <i>Policies</i></p>	<p>General disclosure A3 can be reported as part of Disclosure 103-2 (c-i) Disclosure 103-2 of <i>GRI 103: Management Approach</i>, when used together with:</p> <ul style="list-style-type: none"> • <i>GRI 301: Materials</i> • <i>GRI 302: Energy</i> • <i>GRI 303: Water and Effluents</i> • <i>GRI 304: Biodiversity</i> • <i>GRI 305: Emissions</i> • <i>GRI 306: Waste</i>

HKEX ESG Reporting Guide	GRI Standards and Disclosures	Comments (where applicable)
<p>KPI A3.1 Description of the significant impacts of activities on the environment and natural resources and the actions taken to manage them.</p>	<p>GRI 103: Management Approach, to be used together with:</p> <ul style="list-style-type: none"> • GRI 301: Materials • GRI 302: Energy • GRI 303: Water and Effluents • GRI 304: Biodiversity • GRI 305: Emissions • GRI 306: Waste <p>Disclosure 103-1 Explanation of the material topic and its Boundary</p> <p>Disclosure 103-2 The management approach and its components</p> <p>GRI 303: Water and Effluents</p> <p>Disclosure 303-1 Interaction with water as a shared resource</p> <p>GRI 304: Biodiversity</p> <p>Disclosure 304-2 Significant impacts of activities, products, and services on biodiversity</p> <p>GRI 306: Waste</p> <p>Disclosure 306-2 Management of significant waste-related impacts</p>	<p>The description of actions taken to manage the significant impacts of activities on the environment and natural resources can be reported as part of Disclosures 103-1 and 103-2 of GRI 103: Management Approach, when used together with:</p> <ul style="list-style-type: none"> • GRI 301: Materials • GRI 302: Energy • GRI 303: Water and Effluents • GRI 304: Biodiversity • GRI 305: Emissions • GRI 306: Waste <p>The description of significant impacts of activities on the environment and natural resources can also be reported as part of the following Disclosures:</p> <ul style="list-style-type: none"> • Disclosures 303-1 (a) and 303-1 (c) (Water and Effluents) • Disclosure 304-2 (Biodiversity) • Disclosure 306-2 (a) (Waste)
<p>Aspect A4: Climate Change: General Disclosure Policies on identification and mitigation of significant climate-related issues which have impacted, and those which may impact, the issuer.</p>	<p>GRI 103: Management Approach, to be used together with: GRI 201: Economic Performance</p> <p>Disclosure 103-2 (c-i) The management approach and its components</p> <p>c. <i>A description of the following, if the management approach includes that component:</i></p> <p>i. <i>Policies</i></p> <p>GRI 102: General Disclosures</p> <p>Disclosure 102-29 Identifying and managing economic, environmental, and social impacts</p>	

HKEX ESG Reporting Guide	GRI Standards and Disclosures	Comments (where applicable)
<p>KPI A4.1 Description of the significant climate-related issues which have impacted, and those which may impact, the issuer, and the actions taken to manage them.</p>	<p>GRI 201: Economic Performance</p> <p>Disclosure 201-2 Financial implications and other risks and opportunities due to climate change</p>	
<p>Aspect B1: Employment: General Disclosure Information on:</p> <p>(a) the policies; and</p> <p>(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.</p>	<p>GRI 103: Management Approach, to be used together with:</p> <ul style="list-style-type: none"> • GRI 202: Market Presence • GRI 401: Employment • GRI 405: Diversity and Equal Opportunity • GRI 406: Non-discrimination <p>Disclosure 103-2 (c-i) The management approach and its components</p> <p>c. <i>A description of the following, if the management approach includes that component:</i></p> <p style="padding-left: 20px;">i. <i>Policies</i></p> <p>GRI 419: Socioeconomic Compliance</p> <p>Disclosure 419-1 Non-compliance with laws and regulations in the social and economic area</p>	<p>General disclosure (a) on policies and (b) on compliance can be reported as part of Disclosure 103-2 (c-i) of GRI 103: Management Approach, when used together with:</p> <ul style="list-style-type: none"> • GRI 202: Market Presence • GRI 401: Employment • GRI 405: Diversity and Equal Opportunity • GRI 406: Non-discrimination <p>General disclosure (b) can also be used as input for Disclosure 419-1 of GRI 419: Socioeconomic Compliance.</p>
<p>KPI B1.1 Total workforce by gender, employment type (for example, full- or part-time), age group and geographical region.</p>	<p>GRI 102: General Disclosures</p> <p>Disclosure 102-8 (a, b and c) Information on employees and other workers</p> <p>a. <i>Total number of employees by employment contract (permanent and temporary), by gender.</i></p> <p>b. <i>Total number of employees by employment contract (permanent and temporary), by region.</i></p> <p>c. <i>Total number of employees by employment type (full-time and part-time), by gender</i></p> <p style="text-align: right;"><i>Continues on next page »</i></p>	<p>Disclosure 102-8 in GRI 102: General Disclosures requires quantitative reporting on the total number of employees.</p> <p>If a significant portion of the organization's activities are carried out by workers who are not employees, Disclosure 102-d requires a narrative description of the scale and nature of the work carried out by these workers.</p> <p>The total number of employees by age group can be reported as part of Disclosure 405-1 (b-ii) of GRI 405: Diversity and Equal Opportunity.</p> <p style="text-align: right;"><i>Continues on next page »</i></p>

HKEX ESG Reporting Guide	GRI Standards and Disclosures	Comments (where applicable)
	<p style="text-align: center;">» Continues from previous page</p> <p>GRI 405: Diversity and Equal Opportunity</p> <p>Disclosure 405-1 (b) Diversity of governance bodies and employees</p> <p>b. <i>Percentage of employees per employee category in each of the following diversity categories:</i></p> <p>ii. <i>Age group: under 30 years old, 30-50 years old, over 50 years old;</i></p>	<p style="text-align: center;">» Continues from previous page</p> <p>The GRI Standards define employment type as follows:</p> <p><u>Full-time</u>: A ‘full-time employee’ is an employee whose working hours per week, month, or year are defined according to national legislation and practice regarding working time (such as national legislation which defines that ‘full-time’ means a minimum of nine months per year and a minimum of 30 hours per week).</p> <p><u>Part-time</u>: A ‘part-time employee’ is an employee whose working hours per week, month, or year are less than ‘full-time’ as defined above.</p>
<p>KPI B1.2 Employee turnover rate by gender, age group and geographical region.</p>	<p>GRI 401: Employment</p> <p>Disclosure 401-1(b) New employee hires and employee turnover</p> <p>b. <i>Total number and rate of employee turnover during the reporting period, by age group, gender and region.</i></p>	<p>KPI B1.2 can be reported as part of Disclosure 401-1 (1-(b)) of GRI 401: Employment.</p>
<p>Aspect B2: Health and Safety: General Disclosure Information on:</p> <p>(a) the policies; and</p> <p>(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.</p>	<p>GRI 103: Management Approach, to be used together with GRI 403: Occupational Health and Safety</p> <p>Disclosure 103-2 (c-i) The management approach and its components</p> <p>c. <i>A description of the following, if the management approach includes that component:</i></p> <p>i. <i>Policies</i></p> <p>Disclosure 403-1 Occupational health and safety management system</p> <p>GRI 419: Socioeconomic Compliance</p> <p>Disclosure 419-1 Non-compliance with laws and regulations in the social and economic area</p>	<p>General disclosure (a) on policies and (b) on compliance can be reported as part of Disclosure 103-2 (c-i), when used together with GRI 403: Occupational Health and Safety.</p> <p>Disclosure 403-1 is used to disclose on whether the reporting organization has implemented an occupational health and safety management system and whether this is because of legal requirements.</p> <p>General disclosure (b) can also be used as input for Disclosure 419-1 of GRI 419: Socioeconomic Compliance.</p>

HKEX ESG Reporting Guide	GRI Standards and Disclosures	Comments (where applicable)
<p>KPI B2.1 Number and rate of work-related fatalities occurred in each of the past three years including the reporting year.</p>	<p>GRI 403: Occupational Health and Safety 2018</p> <p>Disclosure 403-9 Work-related injuries</p> <p>Disclosure 403-10 Work-related ill health</p>	<p>GRI 403: Occupational Health and Safety requires separate figures for fatalities as a result of work-related injuries (Disclosure 403-9), and fatalities as a result of ill health (or illnesses/diseases) (GRI 403-10)</p>
<p>KPI B2.2 Lost days due to work injury.</p>	<p>Not directly covered by the GRI Standards.</p>	<p>The GRI Standards do not require disclosure on <i>lost days due to work injury</i>.</p> <p>Reporting the number and rate of work-related injuries that resulted in lost-workday cases, the average number of lost days per lost-workday case, the number of lost workdays, and the absentee rate is recommended (see Guidance for Disclosure 403-9)</p>
<p>KPI B2.3 Description of occupational health and safety measures adopted, and how they are implemented and monitored.</p>	<p>GRI 103: Management Approach, to be used together with GRI 403: Occupational Health and Safety</p> <p>Disclosure 103-2 The management approach and its components</p> <p>Disclosure 103-3 (a-i) Evaluation of the management approach</p> <p>a. <i>An explanation of how the organization evaluates the management approach, including:</i></p> <p>i. <i>the mechanisms for evaluating the effectiveness of the management approach;</i></p> <p>GRI 403: Occupational Health and Safety</p> <p>Disclosure 403-1 Occupational health and safety management system</p> <p>Disclosure 403-3 Occupational health services</p> <p>Disclosure 403-5 Worker training on occupational health and safety</p> <p>Disclosure 403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships</p>	<p>KPI B2.3 can be reported as part of Disclosures 103-2 and Disclosure 103-3 (a-i) of GRI 103: Management Approach, when used together with GRI 403: Occupational Health and Safety.</p> <p>Disclosures 403-1, 403-3, 403-5, and 403-7 also include reporting requirements that are related to the occupational health and safety measures adopted.</p>

HKEX ESG Reporting Guide	GRI Standards and Disclosures	Comments (where applicable)
<p>Aspect B3 Development and Training: General Disclosure Policies on improving employees' knowledge and skills for discharging duties at work. Description of training activities.</p> <p><i>Note: Training refers to vocational training. It may include internal and external courses paid by the employer.</i></p>	<p>GRI 103: Management Approach, to be used together with GRI 404: Training and Education</p> <p>Disclosure 103-2 (c-i) The management approach and its components</p> <p>c. A description of the following, if the management approach includes that component:</p> <p>i. Policies</p> <p>GRI 404: Training and Education</p> <p>Disclosure 404-2 (a) Programs for upgrading employee skills and transition assistance programs</p> <p>a. Type and scope of programs implemented and assistance provided to upgrade employee skills.</p>	<p>General disclosure B3 on development and training policies and activities can be reported as part of Disclosure 103-2 (c-i) of <i>GRI 103: Management Approach</i>, when used together with <i>GRI 404: Training and Education</i>.</p> <p>Disclosure 404-2 (a) of <i>GRI 404: Training and Education</i> can be used to report programs for employee skills management more specifically.</p>
<p>KPI B3.1 The percentage of employees trained by gender and employee category (e.g. senior management, middle management).</p>	<p>Not covered by the GRI Standards.</p>	<p>The GRI Standards require the average hours of training per year per employee (Disclosure 404-1 of <i>GRI 404: Training and Education</i>), but not the percentage of employees trained.</p>
<p>KPI B3.2 The average training hours completed per employee by gender and employee category.</p>	<p>GRI 404: Training and Education</p> <p>Disclosure 404-1 Average hours of training per year per employee</p>	
<p>Aspect B4: Labour Standards: General Disclosure Information on:</p> <p>(a) the policies; and</p> <p>(b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to preventing child and forced labour.</p>	<p>GRI 103: Management Approach, to be used together with:</p> <ul style="list-style-type: none"> • GRI 408: Child Labor • GRI 409: Forced or Compulsory Labor <p>Disclosure 103-2 (c-i) The management approach and its components</p> <p>c. A description of the following, if the management approach includes that component:</p> <p>i. Policies</p> <p>GRI 419: Socioeconomic Compliance</p> <p>Disclosure 419-1 Non-compliance with laws and regulations in the social and economic area</p>	<p>General disclosure (a) on policies and (b) on compliance can be reported as part of Disclosure 103-2 (c-i) of <i>GRI 103: Management Approach</i>, when used together with:</p> <ul style="list-style-type: none"> • <i>GRI 408: Child Labor</i> • <i>GRI 409: Forced or Compulsory Labor</i> <p>General disclosure (b) can also be used as input for Disclosure 419-1 of <i>GRI 419: Socioeconomic Compliance</i>.</p>

HKEX ESG Reporting Guide	GRI Standards and Disclosures	Comments (where applicable)
<p>KPI B4.1 Description of measures to review employment practices to avoid child and forced labour.</p>	<p>GRI 103: Management Approach, to be used together with:</p> <ul style="list-style-type: none"> • GRI 408: Child Labor • GRI 409: Forced or Compulsory Labor <p>Disclosure 103-2 The management approach and its components</p> <p>GRI 408: Child Labor</p> <p>Disclosure 408-1(c) Operations and suppliers at significant risk for incidents of child labor</p> <p><i>c. Measures taken by the organization in the reporting period intended to contribute to the effective abolition of child labor</i></p> <p>GRI 409: Forced or Compulsory Labor</p> <p>Disclosure 409-1(b) Operations and suppliers at significant risk for incidents of forced or compulsory labor</p> <p><i>b. Measures taken by the organization in the reporting period intended to contribute to the elimination of all forms of forced or compulsory labor.</i></p>	<p>KPI B4.1 can be reported as part of Disclosure 103-2 of GRI 103: Management Approach, when used together with:</p> <ul style="list-style-type: none"> • GRI 408: Child Labor • GRI 409: Forced or Compulsory Labor <p>KPI B4.1 can also be reported as part of:</p> <ul style="list-style-type: none"> • Disclosure 408-1 (c) of GRI 408: Child Labor • Disclosure 409-1 (c) of GRI 409: Forced or Compulsory Labor
<p>KPI B4.2 Description of steps taken to eliminate such practices when discovered.</p>	<p>GRI 103: Management Approach, to be used together with:</p> <ul style="list-style-type: none"> • GRI 408: Child Labor • GRI 409: Forced or Compulsory Labor <p>Disclosure 103-2 The management approach and its components</p> <p>GRI 408: Child Labor</p> <p>Disclosure 408-1 (c) Operations and suppliers at significant risk for incidents of child labor</p> <p><i>c. Measures taken by the organization in the reporting period intended to contribute to the effective abolition of child labor.</i></p>	<p>KPI B4.2 can be reported as part of the Disclosure 103-2 of GRI 103: Management Approach, when used together with:</p> <ul style="list-style-type: none"> • GRI 408: Child Labor • GRI 409: Forced or Compulsory Labor <p>KPI B4.2 can also be reported as part of:</p> <ul style="list-style-type: none"> • Disclosure 408-1 (c) of GRI 408: Child Labor • Disclosure 409-1 (b) of GRI 409: Forced or Compulsory Labor

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HKEX ESG Reporting Guide	GRI Standards and Disclosures	Comments (where applicable)
	<p style="text-align: right;">» Continues from previous page</p> <p>GRI 409: Forced or Compulsory Labor</p> <p>Disclosure 409-1(b) Operations and suppliers at significant risk for incidents of forced or compulsory labor</p> <p><i>b. Measures taken by the organization in the reporting period intended to contribute to the elimination of all forms of forced or compulsory labor.</i></p>	
<p>Aspect B5: Supply Chain Management: General Disclosure Policies on managing environmental and social risks of the supply chain.</p>	<p>GRI 103: Management Approach, to be used together with:</p> <ul style="list-style-type: none"> • GRI 308: Supplier Environmental Assessment • GRI 414: Supplier Social Assessment <p>Disclosure 103-2 (c-i) The management approach and its components</p> <p><i>c. A description of the following, if the management approach includes that component:</i></p> <p><i>i. Policies</i></p>	<p>Aspect B5 can be reported as part of Disclosure 103-2 (c-i) of GRI 103: Management Approach, when used together with:</p> <ul style="list-style-type: none"> • <i>GRI 308: Supplier Environmental Assessment</i> • <i>GRI 414: Supplier Social Assessment</i>
<p>KPI B5.1 Number of suppliers by geographical region.</p>	<p>GRI 102: General Disclosures</p> <p>Disclosure 102-9 Supply chain</p>	<p>The number of suppliers by geographical region can be reported as part of Disclosure 102-9 of GRI 102: General Disclosures, but it is not required by the GRI Standards.</p>
<p>KPI B5.2 Description of practices relating to engaging suppliers, number of suppliers where the practices are being implemented, and how they are implemented and monitored.</p>	<p>GRI 102: General Disclosures</p> <p>Disclosure 102-9 Supply chain</p> <p>GRI 103: Management Approach, to be used together with:</p> <ul style="list-style-type: none"> • GRI 303: Water and Effluents • GRI 308: Supplier Environmental Assessment • GRI 414: Supplier Social Assessment <p>Disclosure 103-2 The management approach and its components</p> <p>GRI 303: Water and Effluents</p> <p>Disclosure 303-1 Interactions with water as a shared resource</p> <p style="text-align: right;"><i>Continues on next page »</i></p>	<p>Disclosure 102-9 provides guidance for disclosure about the supply chain, including the types of suppliers engaged, the total number of suppliers engaged by and organizations, and the estimated number of suppliers throughout the supply chain.</p> <p>KPI B5.2 can also be reported as part of Disclosures 103-2 of GRI 103: Management Approach, when used together with:</p> <ul style="list-style-type: none"> • <i>GRI 303: Water and Effluents</i> • <i>GRI 308: Supplier Environmental Assessment</i> • <i>GRI 414: Supplier Social Assessment</i> <p style="text-align: right;"><i>Continues on next page »</i></p>

HKEX ESG Reporting Guide	GRI Standards and Disclosures	Comments (where applicable)
	<p style="text-align: center;">» Continues from previous page</p> <p>GRI 308: Supplier Environmental Assessment</p> <p>Disclosure 308-1 New suppliers that were screened using environmental criteria</p> <p>Disclosure 308-2 Negative environmental impacts in the supply chain and actions taken</p> <p>GRI 414: Supplier Social Assessment</p> <p>Disclosure 414-1 New suppliers that were screened using social criteria</p> <p>Disclosure 414-2 Negative social impacts in the supply chain and actions taken</p>	<p style="text-align: center;">» Continues from previous page</p> <p>KPI B5.2 can also be reported as part of the following Disclosures:</p> <ul style="list-style-type: none"> • Disclosure 303-1 (c) of GRI 303: Water and Effluents • Disclosure 308-1 of GRI 308: Supplier Environmental Assessment • Disclosure 308-2 of GRI 308: Supplier Environmental Assessment • Disclosure 414-1 of GRI 414: Supplier Social Assessment • Disclosure 414-2 of GRI 414: Supplier Social Assessment
<p>KPI B5.3 Description of practices used to identify environmental and social risks along the supply chain, and how they are implemented and monitored</p>	<p>GRI 102: General Disclosures</p> <p>Disclosure 102-9 Supply chain</p> <p>GRI 103: Management Approach, to be used together with:</p> <ul style="list-style-type: none"> • GRI 303: Water and Effluents • GRI 308: Supplier Environmental Assessment • GRI 414: Supplier Social Assessment <p>Disclosure 103-2 The management approach and its components</p> <p>GRI 303: Water and Effluents</p> <p>Disclosure 303-1 Interactions with water as a shared resource</p> <p>GRI 308: Supplier Environmental Assessment</p> <p>Disclosure 308-1 New suppliers that were screened using environmental criteria</p> <p>Disclosure 308-2 Negative environmental impacts in the supply chain and actions taken</p> <p style="text-align: right;">Continues on next page »</p>	<p>KPI B5.3 can be reported as part of Disclosures 103-2 of GRI 103: Management Approach, when used together with:</p> <ul style="list-style-type: none"> • GRI 303: Water and Effluents • GRI 308: Supplier Environmental Assessment • GRI 414: Supplier Social Assessment <p>KPI B5.3 can also be reported as part of the following Disclosures:</p> <ul style="list-style-type: none"> • Disclosure 303-1 (c) of GRI 303: Water and Effluents • Disclosure 308-1 of GRI 308: Supplier Environmental Assessment • Disclosure 308-2 of GRI 308: Supplier Environmental Assessment • Disclosure 414-1 of GRI 414: Supplier Social Assessment • Disclosure 414-2 of GRI 414: Supplier Social Assessment

HKEX ESG Reporting Guide	GRI Standards and Disclosures	Comments (where applicable)
	<p style="text-align: right;">» Continues from previous page</p> <p>GRI 414: Supplier Social Assessment</p> <p>Disclosure 414-1 New suppliers that were screened using social criteria</p> <p>Disclosure 414-2 Negative social impacts in the supply chain and actions taken</p>	
<p>KPI B5.4 Description of practices used to promote environmentally preferable products and services when selecting suppliers, and how they are implemented and monitored.</p>	<p>GRI 103: Management Approach, to be used together with:</p> <ul style="list-style-type: none"> • GRI 306: Waste • GRI 308: Supplier Environmental Assessment <p>Disclosure 103-2 The management approach and its components</p>	<p>KPI B5.4 can be reported as part of Disclosures 103-2 of GRI 103: Management Approach, when used together with:</p> <ul style="list-style-type: none"> • GRI 306: Waste • GRI 308: Supplier Environmental Assessment
<p>Aspect B6 Product Responsibility: General Disclosure Information on:</p> <p>(a) the policies; and</p> <p>(b) (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.</p>	<p>GRI 103: Management Approach, to be used together with:</p> <ul style="list-style-type: none"> • GRI 416: Customer Health and Safety • GRI 417: Marketing and Labeling • GRI 418: Customer Privacy <p>Disclosure 103-2 (c-i) The management approach and its components</p> <p>c. <i>A description of the following, if the management approach includes that component:</i></p> <p style="padding-left: 20px;">i. <i>Policies</i></p> <p>GRI 416: Customer Health and Safety</p> <p>Disclosure 416-2 Incidents of non-compliance concerning the health and safety impacts of products and services</p> <p style="text-align: right;">Continues on next page »</p>	<p>General disclosure (a) on policies and (b) on compliance can be reported as part of Disclosure 103-2 (c-i) of GRI 103: Management Approach, when used together with:</p> <ul style="list-style-type: none"> • GRI 416: Customer Health and Safety • GRI 417: Marketing and Labeling • GRI 418: Customer Privacy <p>General disclosure (b) on compliance can be used as input for the following topic-specific disclosures:</p> <ul style="list-style-type: none"> • Disclosure 416-2 of GRI 416: Customer Health and Safety • Disclosure 417-2 of GRI 417: Marketing and Labeling • Disclosure 417-3 of GRI 417: Marketing and Labeling • Disclosure 418-1 of GRI 418: Customer Privacy • Disclosure 419-1 of GRI 419: Socioeconomic Compliance

HKEX ESG Reporting Guide	GRI Standards and Disclosures	Comments (where applicable)
	<p style="text-align: right;">» <i>Continues from previous page</i></p> <p>GRI 417: Marketing and Labeling</p> <p>Disclosure 417-2 Incidents of non-compliance concerning product and service information and labeling</p> <p>Disclosure 417-3 Incidents of non-compliance concerning marketing communications</p> <p>GRI 418: Customer Privacy</p> <p>Disclosure 418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data</p> <p>GRI 419: Socioeconomic Compliance</p> <p>Disclosure 419-1 Non-compliance with laws and regulations in the social and economic area</p>	
<p>KPI B6.1 Percentage of total products sold or shipped subject to recalls for safety and health reasons.</p>	<p>Not covered by the GRI Standards.</p>	<p>GRI reporters can include this information when reporting on <i>GRI 416: Customer Health and Safety</i>, but this is not required.</p>
<p>KPI B6.2 Number of products and service related complaints received and how they are dealt with.</p>	<p>GRI 102: General Disclosures</p> <p>Disclosure 102-43 Approach to stakeholder engagement</p> <p>Disclosure 102-44 Key topics and concerns raised</p> <p>GRI 103: Management Approach, when used together with GRI 418: Customer Privacy or a related material topic</p> <p>Disclosure 103-2 (c-vi) The management approach and its components</p> <p>c. <i>A description of the following, if the management approach includes that component:</i></p> <p>vi. <i>Grievance mechanisms</i></p> <p>GRI 418: Customer Privacy</p> <p>Disclosure 418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data</p>	<p>KPI B6.2 can be reported as part of Disclosure 103-2 (c-vi) of <i>GRI 103: Management Approach</i> (on grievance mechanisms), when used together with <i>GRI 418: Customer Privacy</i>, or a related material topic.</p> <p>KPI B6.2 can also be reported as part of the following disclosures:</p> <ul style="list-style-type: none"> • Disclosure 102-43 of <i>GRI 102: General Disclosures</i> • Disclosure 102-44 of <i>GRI 102: General Disclosures</i> • Disclosure 418-1 of <i>GRI 418: Customer Privacy</i> <p>Disclosure 418-1 covers complaints regarding breaches of customer privacy, and Disclosures 102-43 and 102-44 cover customer satisfaction more generally as part of stakeholder engagement.</p>

HKEX ESG Reporting Guide	GRI Standards and Disclosures	Comments (where applicable)
<p>KPI B6.3 Description of practices relating to observing and protecting intellectual property rights.</p>	Not covered by the GRI Standards.	
<p>KPI B6.4 Description of quality assurance process and recall procedures.</p>	Not covered by the GRI Standards.	KPI B6.4 is not requested in the GRI Standards but can be reported as part of Disclosure 103-2 of <i>GRI 103: Management Approach</i> , when used together with <i>GRI 416: Customer Health and Safety</i> .
<p>KPI B6.5 Description of consumer data protection and privacy policies, and how they are implemented and monitored.</p>	<p>GRI 103: Management Approach, to be used together with GRI 418: Customer Privacy</p> <p>Disclosure 103-2 The management approach and its components</p> <p>Disclosure 103-3 (a-i) Evaluation of the management approach</p> <p>a. An explanation of how the organization evaluates the management approach, including:</p> <p>i. the mechanisms for evaluating the effectiveness of the management approach;</p>	KPI B6.5 can be reported as part of Disclosures 103-2 and 103-3 (a-i) of <i>GRI 103: Management Approach</i> , when used together with the <i>GRI 418: Customer Privacy</i> .
<p>Aspect B7: Anti-corruption: General Disclosure Information on:</p> <p>(a) the policies; and</p> <p>(b) compliance with relevant laws and regulations that have a significant impact on the issuer relating to bribery, extortion, fraud and money laundering.</p>	<p>GRI 103: Management Approach, to be used together with GRI 205: Anti-corruption</p> <p>Disclosure 103-2 (c-i) The management approach and its components</p> <p>c. A description of the following, if the management approach includes that component:</p> <p>i. Policies</p> <p>GRI 205: Anti-corruption</p> <p>Disclosure 205-3 Confirmed incidents of corruption and actions taken</p> <p>GRI 419: Socioeconomic Compliance</p> <p>Disclosure 419-1 Non-compliance with laws and regulations in the social and economic area</p>	<p>General disclosure (a) on policies and (b) on compliance can be reported as part of Disclosure 103-2 (c-i) of <i>GRI 103: Management Approach</i>, when used together with <i>GRI 205: Anti-corruption</i>.</p> <p>General disclosure (b) can also be used as input for the following topic-specific disclosures:</p> <ul style="list-style-type: none"> Disclosure 205-3 of <i>GRI 205: Anti-corruption</i> Disclosure 419-1 of <i>GRI 419: Socioeconomic Compliance</i>

HKEX ESG Reporting Guide	GRI Standards and Disclosures	Comments (where applicable)
<p>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.</p>	<p>GRI 205: Anti-corruption</p> <p>Disclosure 205-3 Confirmed incidents of corruption and actions taken</p>	<p>KPI B7.1 requests disclosure of 'concluded legal cases', whereas Disclosure 205-3 of <i>GRI 205: Anti-corruption</i> requires disclosure of 'confirmed incidents of corruption' (Disclosure 205-3-a) and 'public legal cases regarding corruption' (Disclosure 205-3-d), which may or may not have concluded.</p> <p>The GRI Standards define a 'confirmed incident of corruption' as an incident of corruption that has been found to be substantiated. This does not include incidents of corruption that are still under investigation in the reporting period.</p>
<p>KPI B7.2 Description of preventive measures and whistle-blowing procedures, how they are implemented and monitored.</p>	<p>GRI 102: General Disclosures</p> <p>Disclosure 102-17 Mechanisms for advice and concerns about ethics</p> <p>GRI 103: Management Approach, to be used together with GRI 205: Anti-corruption</p> <p>Disclosure 103-2 The management approach and its components</p> <p>Disclosure 103-3 (a-i) Evaluation of the management approach</p> <p>a. <i>An explanation of how the organization evaluates the management approach, including:</i></p> <p>i. <i>the mechanisms for evaluating the effectiveness of the management approach;</i></p> <p>GRI 205: Anti-corruption</p> <p>Management approach disclosures Clause 1.2</p>	<p>KPI B7.2 can be reported as part of Disclosure 102-17; and Disclosures 103-2 and 103-3 (a-i) of <i>GRI 103: Management Approach</i>, when used together with <i>GRI 205: Anti-corruption</i>.</p> <p>This is also covered by clause 1.2 (recommendations for reporting the management approach) in <i>GRI 205: Anti-corruption</i>.</p>
<p>KPI B7.3 Description of anti-corruption training provided to directors and staff.</p>	<p>GRI 205: Anti-corruption</p> <p>Disclosure 205-2 Communication and training about anti-corruption policies and procedures</p> <p>GRI 205: Anti-corruption</p> <p>Management approach disclosures Clause 1.2.4</p>	

HKEX ESG Reporting Guide	GRI Standards and Disclosures	Comments (where applicable)
<p>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.</p>	<p>GRI 103: Management Approach, to be used together with GRI 413: Local Communities</p> <p>Disclosure 103-2 (c-i) The management approach and its components</p> <p>c. A description of the following, if the management approach includes that component:</p> <p>i. Policies</p>	<p>B8 can be reported as part of Disclosure 103-2 (c-i) of <i>GRI 103: Management Approach</i>, when used together with <i>GRI 413: Local Communities</i>.</p>
<p>KPI B8.1 Focus areas of contribution (e.g. education, environmental concerns, labour needs, health, culture, sport).</p>	<p>GRI 203: Indirect Economic Impacts</p> <p>Disclosures 203-1 (a) Infrastructure investments and services supported</p> <p>a. Extent of development of significant infrastructure investments and services supported.</p>	<p>KPI B8.1 can be reported as part of Disclosure 203-1 (a) of <i>GRI 203: Indirect Economic Impacts</i>.</p>
<p>KPI B8.2 Resources contributed (e.g. money or time) to the focus area.</p>	<p>GRI 201: Economic Performance</p> <p>Disclosure 201-1 (a-ii) Direct economic value generated and distributed</p> <p>a. Direct economic value generated and distributed (EVG&D) on an accruals basis, including the basic components for the organization's global operations as listed below. If data are presented on a cash basis, report the justification for this decision in addition to reporting the following basic components:</p> <p>ii. Economic value distributed: operating costs, employee wages and benefits, payments to providers of capital, payments to government by country, and community investments.</p>	<p>Disclosure 201-1 (a-ii) of <i>GRI 201: Economic Performance</i> requires disclosure of community investments.</p>

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