

Corporate Governance

Introduction

Our approach to corporate responsibility is integral to corporate governance and corporate strategy. Directed by our Vision, Mission and Values and guided by our established processes of Enterprise Risk Management and Stakeholder Engagement, we manage our businesses to balance the interests of all stakeholders.

Sustainable Competitive Advantage



Learn more...

Each year, we publish a Corporate Governance Report as part of our Annual Report. It describes the best practices we have adopted with reference to the Corporate Governance Code from the Listing Rules of Hong Kong Exchanges and Clearing Limited.

What Does Corporate Responsibility Mean to Us?

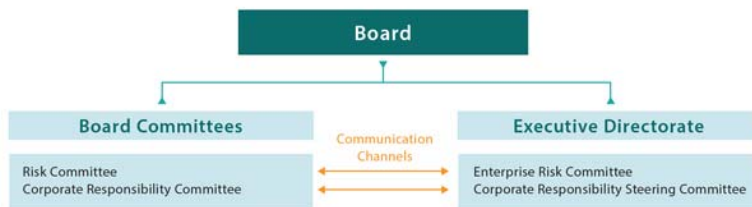
Our approach to corporate responsibility is documented throughout this report. We strive to be a leader in safety, to meet and exceed our customers' expectations for service, to treat our staff with respect, to manage our impacts on the environment and to contribute positively to the community.

Underpinning all of this are sustainable financial models, allowing us to provide reasonable returns to capital providers while achieving our Vision, Mission and Values. Working with partners in our Value Chain is also important for being a responsible, competitive and profitable enterprise that builds and connects communities.

Management Approach

Corporate responsibility is embedded in our organisation through established committees at both Board and Executive levels.

Committee Structures for Risk and Corporate Responsibility



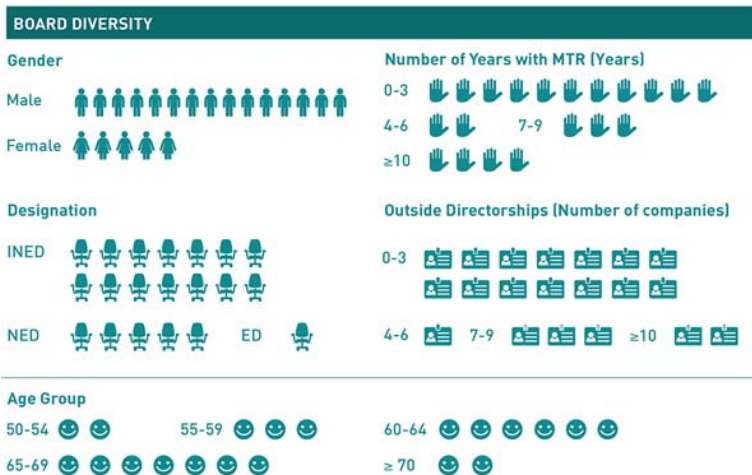
Learn more...

Please refer to [Terms of Reference](#) for the Board Corporate Governance Functions and our [Board Diversity Policy](#).

Board of Directors

The Board of Directors is our highest governing body. Led by the Chairman, it focuses on overall strategic policies and corporate governance. During 2014, the Board of Directors strengthened corporate governance by setting up new committees for Capital Works and Risk and by appointing four new Non-Executive and Independent Non-Executive Directors.

Our Board Diversity Policy ensures that Board members have an appropriate balance of skills, experience and diversity of perspectives. This diversity enhances effective execution of our business strategy.



Corporate Responsibility (CoR) Committee

Reports to:	Board of Directors
Chaired by:	Chairman of the Board
Frequency of meetings:	Twice per year
Composition:	Two Non-Executive Directors (including the Chairman), four Independent Non- Executive Directors, and three members of the Executive Directorate, including the

Learn more...

Please refer to [Terms of Reference](#) for the Corporate Responsibility Committee.

Chief Executive Officer (CEO) and the
Legal Director & Secretary (LD&S).

The Corporate Responsibility (CoR) Committee monitors implementation of the [Corporate Responsibility Policy](#) and the [Corporate Sustainability Policy](#).

Risk Committee

Reports to: Board of Directors
Chaired by: An Independent Non-Executive Director, appointed by the Board
Frequency of meetings: No less than once every quarter
Composition: At least four Non-Executive Directors, with a majority of Independent Non-Executive Directors.

The Risk Committee has oversight on [Enterprise Risk Management \(ERM\)](#); it is mandated by the Board to review the effectiveness of the ERM framework, including top risks and emerging risks and to commission “deep dive” reviews on key risk areas. Crisis management arrangements are reviewed on a regular basis.

Executive Committee

The Board has delegated day-to-day management of the Company’s business to the Executive Committee. Led by the Chief Executive Officer, this committee is comprised of seven Executive Directors and the General Manager - Corporate Relations.

Corporate Responsibility Steering Committee (CoRSC)

Reports to: CoR Committee
Chaired by: Legal Director & Secretary
Frequency of meetings: Four times per year
Composition: Executive Directors and senior managers representing all major business units.

The CoR Steering Committee monitors and approves initiatives related to corporate responsibility and sustainability in consultation with all major business units.

Enterprise Risk Committee (ERC)

Reports to: Risk Committee
Chaired by: Legal Director & Secretary
Frequency of meetings: Four times per year

Learn more...

Please refer to [Terms of Reference](#) for the Risk Committee.

Composition: Executive Directors and senior managers representing all major business units.

The Enterprise Risk Committee monitors enterprise risks and approves risk management measures in consultation with all business units.

Enhancing Corporate Governance in 2014

The Board established an Independent Board Committee (IBC) to examine the Express Rail Link delay that was announced in the first half of 2014. We have accepted the findings of two IBC reports, including recommendations to enhance management systems and reporting, monitoring and communication processes.

After the departure of Chief Executive Officer Mr Jay H Walder on 15 August 2014, the Board appointed Deputy Chief Executive Officer Mr Lincoln Leong to be Acting Chief Executive Officer with effect from 16 August 2014. On 12 March 2015 the Board appointed Mr Leong as Chief Executive Officer with effect from 16 March 2015, for a term of three years.

During the year, the Risk Committee and the Capital Works Committee (CWC) were established at Board level to provide additional monitoring of overall enterprise risk and major capital projects. The Board also adopted key milestones and performance indicators that were recommended by the IBC, and the implementation of these measures is being monitored by the CWC.

The Office of the Chief Executive of the HKSAR published the Report of the Express Rail Link Independent Expert Panel on 30 January 2015. We have reviewed this report in conjunction with experts appointed by the IBC and will implement its recommendations where appropriate.

Learn more...

In the spirit of openness and transparency, we released a [Supplementary Note](#) to our Sustainability Report 2013 to address public concern and criticism about the revised programme for the Express Rail Link project that was announced in the first half of 2014. Subsequent to that, we have made more information available about project delays and enhancement of corporate governance in relevant [press releases](#) on our corporate website and also in our [Annual Report 2014](#).

The [Report of the Express Rail Link Independent Expert Panel](#) has been published by the Government.

Enhancing Enterprise Risk Management in 2014

Our framework for Enterprise Risk Management (ERM) provides a simple and effective management process to aid business units across the organisation to identify and review risks and prioritise resources to manage risks that arise. It provides our managers with a clear view of the significant risks facing the Company and is used to support decision making and project execution, helping to deliver better business performance.

We are taking proactive measures to manage risks arising from our recurrent business and business growth as well as from the constantly changing business environment. Some key risks that we are currently managing include the following:

- Reputational impacts arising from programme slippage and cost overruns on network expansion projects in 2014. In response, we have implemented measures to enhance corporate governance.
- Reputational impacts arising from public dissatisfaction with the tendering process for property development projects. In response, we have formulated a comprehensive communication plan and reviewed our tendering strategy for individual property development projects.
- Risks to successful completion of four major new railway projects that are underway in Hong Kong, including general shortage of workers, geotechnical difficulties, and technicalities related to carrying out construction activities in close proximity to operational rail lines and urban developments.
- Service disruptions and over-crowding in some sections of our network. Please refer to Customers.
- Impacts of workforce transition and growing manpower needs. Please refer to Staff.

In mid-2014, the ERC conducted a thorough review of the ERM framework and implemented some new measures to raise risk awareness across all levels of the organisation. These measures include launching our first Risk Awareness Week in October 2014, introducing a computer-based ERM training programme for managers, holding regular meetings of the Executive Committee to discuss top risks and emerging risks, and increasing the frequency of reporting by the ERC to the Executive Committee and the Board. These enhancements are helping to reinforce a risk-informed and risk-aware culture.

We keep ourselves abreast of the latest developments in risk management through reviews with users, cross-industry benchmarking and experience sharing. During Risk Awareness Week 2014, we engaged external risk experts to share best

practices on risk management with our executives, senior managers, members of the ERC and divisional risk co-ordinators.

Corporate Policies

Our management approach to corporate responsibility comprises a number of corporate policies, particularly on issues that are considered to be highly material to our stakeholders and/or that require extensive cross-departmental coordination.

Please refer to the following policies, which can be downloaded from this site. Please click on the name of each document to open it as a pdf file or follow the links provided to other relevant information about implementation of each policy in this report.

[Corporate Responsibility Policy](#)

[Corporate Sustainability Policy](#)

[Safety Policy](#)

[Climate Change Policy](#)

[Biodiversity Policy](#)

[Whistle-blowing Policy](#)

[Corporate Board Diversity Policy](#)

External charters and memberships

We endorse externally developed charters, principles and initiatives, and participate in associations and advocacy organisations. To download a list, please click [here](#).



Corporate Governance

Fair and Ethical Business

Our success depends on the trust placed in us by our stakeholders. It is therefore the responsibility of all members of our staff to uphold our reputation as a fair and ethical business at all times.

Code of Conduct

In 2014, we carried out a comprehensive review of our Code of Conduct (“the Code”) for employees and made revisions so that it will be more understandable and user-friendly for members of our staff. Together with other corporate policies and guidelines, the Code reinforces the trust placed in us by our stakeholders. It aligns with our VMV and supports our goal to enhance transparency. Staff members at all levels of the organisation must uphold the highest standard of business ethics and respect principles of fairness, impartiality and integrity in all locations where we do business.

Ethical behaviour starts at the top, so leaders of our organisation must set an example for all members of staff. They are responsible for identifying potential issues, encouraging compliance with the Code, challenging unethical behaviour, and addressing any reported violations or practices that do not match our standards.

Learn more...

Please refer to the latest version of our [Code of Conduct](#).

Anti-Corruption and Whistle-Blowing

We encourage and assist whistle-blowers to raise grievances without fear of reprisal. Our [Whistle-blowing Policy](#) applies to all members of staff and to anyone who has dealings with the Company, including customers, business partners and suppliers.

All reports of misconduct are treated with the utmost urgency, confidentiality, and respect. During 2014, our Whistle-blowing Panel evaluated 14 cases, of which nine were determined to be unsubstantiated through follow-up investigations. The three cases that were substantiated or partially substantiated related

to conduct of individual staff members and did not involve allegations of unfair or unlawful behaviour by the Company. Appropriate follow-up action is being taken in response to the substantiated cases, including disciplinary action where appropriate. Two of the cases are still under investigation.





Our Stakeholders

Our stakeholders include any entity or individual who is significantly affected by our principal activities in Hong Kong and/or whose actions are expected to significantly affect the ability of the Company to achieve its objectives. By this definition, we have millions of stakeholders from all parts of our city, of all ages, all socio-economic groups, and all types of employment.

Stakeholder engagement is a dynamic and evolving process that provides essential input into our business. Please refer to Safety, Environment, Staff, Community, Customers and Value Chain to learn about our approach to engaging with stakeholders on all of these topics.

Despite the enormous diversity of views and opinions that are represented, we want all of our stakeholders to feel heard and understood. For the purposes of our materiality assessment, we have created nine categories of stakeholders. Definitions for each stakeholder group can be found in our interactive Materiality Matrix.



Materiality Matrix

Sustainability reporting is one way that we engage with our stakeholders on an annual basis. The infographic below presents an overview of our approach to stakeholder engagement and reflects outcomes from our stakeholder engagement process that were relevant to our sustainability reporting in 2014.

Materiality Outcomes Arranged by Topic

Please click on each Topic to see a list of relevant sustainability issues and their position in the Materiality Matrix. Where appropriate, the list contains links to more information about the sustainability issues on this report website.

I. FAIR OPERATING PRACTICES	Materiality Level	Website location
1 Organizational Governance structure and process	High	Corporate Governance Introduction
2 Fair operating practices (including ethical dealings with other organisations)	High	Fair and Ethical Business
3 Anti-corruption	High	Anti-Corruption and Whistle-Blowing
4 Responsible political involvement	High	Stakeholder Engagement and Materiality
5 Fair competition	High	Fair and Ethical Business

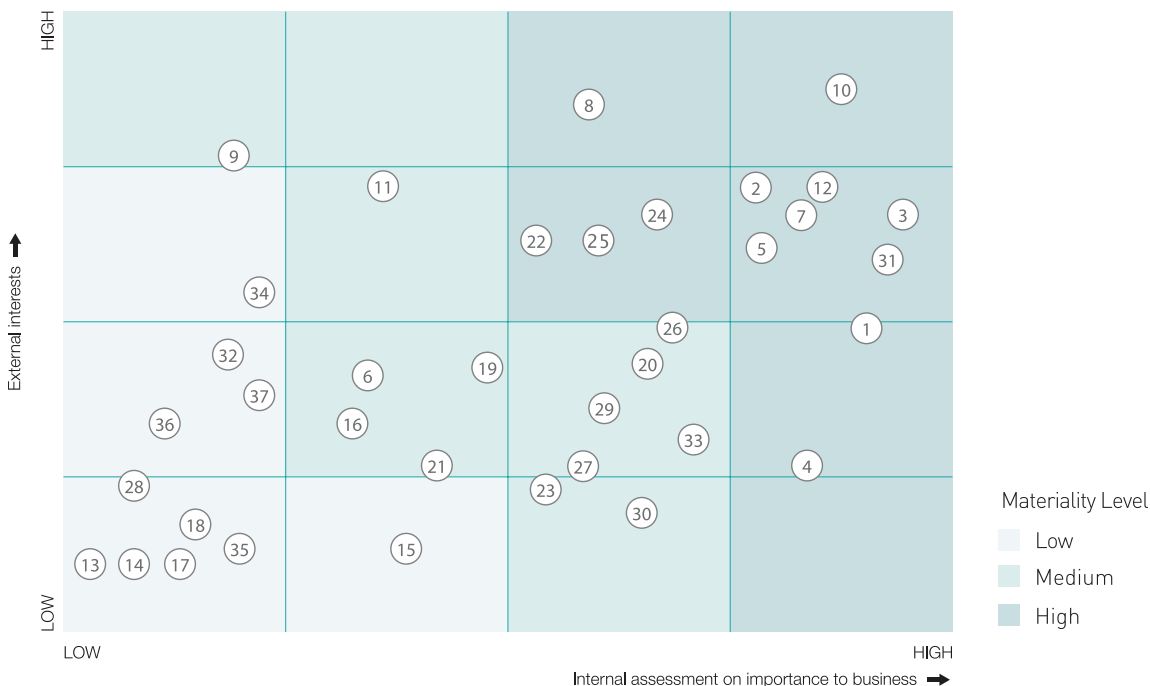
II. CONSUMER ISSUES	Materiality Level	Website location
6 Fair marketing (including factual and unbiased information)	Medium	Not reported
7 Customer education	High	Safety Management Approach Fares for Hong Kong Transport Operations
8 Customers' health & safety	High	Customer Safety
9 Sustainable products & services	Medium	Evaluation of Materiality Assessment Results
10 Customer service, support, and complaint handling	High	Customers Introduction
11 Customer data protection & privacy	Medium	Evaluation of Materiality Assessment Results
12 Access to essential services (including avoidance of service disruption)	High	Train Service Performance

III. HUMAN RIGHTS LABOUR PRACTICES	Materiality Level	Website location
13 Human rights risks assessment	Low	Not reported
14 Human rights risk issues	Low	Not reported
15 Human rights grievances mechanism	Low	Anti-Corruption and Whistle-Blowing
16 Diversity and equal opportunity	Medium	Corporate Governance Introduction Staff Introduction
17 Fundamental principles & rights at work (based on Internal Labour Organisation standards)	Low	Not reported
18 Protection of civil & political rights of staff	Low	Not reported
19 Employment practices	Medium	Staff Introduction
20 Conditions of work & social protection	Medium	Staff Management Approach
21 Staff consultation and engagement (including freedom of association and collective bargaining)	Medium	Staff Management Approach
22 Employee and contractor health & safety	High	Staff and Contractor Safety
23 Employee development & training	Medium	Training Programmes

IV. THE ENVIRONMENT	Materiality Level	Website location
24 Prevention of pollution (including air, water & waste)	High	Environmental Protection
25 Sustainable resource use (including resource efficiency & water use)	High	Sustainable Resource Use
26 Climate change	Medium	Climate Change
27 Biodiversity	Medium	Ecology

V. SUPPLY CHAIN	Materiality Level	Website location
28 Supply chain human rights risk	Low	Supply Chain Management
29 Promoting social responsibility in the value chain	Medium	Value Chain Introduction

VI. COMMUNITY INVOLVEMENT AND DEVELOPMENT	Materiality Level	Website location
30 Payment from government / tax payment	Medium	Rail plus Property Model
31 Community involvement and development (including stakeholder engagement)	High	Community Engagement
32 Education and culture	Low	Case study: Island Line Extension to Western District Community Investment
33 Employment creation and skills development	Medium	Our People Recruitment in Hong Kong
34 Technology development and access	Low	Not reported
35 Wealth and income creation	Low	Not reported
36 Community health	Low	Not reported
37 Community investment (including staff volunteering)	Low	Staff Volunteering Community Investment



Materiality Outcomes for Stakeholder Groups

Please select any stakeholder group to see a definition, and to learn about engagement channels and sustainability issues of interest to each type of stakeholder. Where appropriate, there are links to more information about MTR's response to stakeholders' interests on this report website.

Stakeholder	Engagement Channels	Key interests	Materiality Level	How MTR responds
Investors	Shareholders, including our majority shareholder the Hong Kong Government, other providers of capital and financial analysts.			
<ul style="list-style-type: none"> Annual and interim reporting Annual General Meeting Special announcements Investor road shows MTR Hotline Socially Responsible Investment Indices 	1	Organizational governance structure and Process	High	Corporate Governance Introduction
	2	Fair operating practices	High	Fair and Ethical Business
	3	Anti-corruption	High	Anti-Corruption and Whistle-Blowing
	4	Responsible political involvement	High	Stakeholder Engagement and Materiality
	5	Fair competition	High	Fair and Ethical Business
	6	Fair marketing	Medium	Not reported
	7	Customer education	High	Safety Management Approach Fares for Hong Kong Transport Operations
	8	Customers' health & safety	High	Customer Safety
	9	Sustainable products & services	Medium	Evaluation of Materiality Assessment Results
	10	Customer service, support, and complaint handling	High	Customers Introduction
	12	Access to essential services	High	Train Service Performance
Staff	All employees of the Company and its subsidiaries.			
<ul style="list-style-type: none"> Management Communication Meetings Divisional Communication Meetings Staff Attitude Survey Meetings with staff unions Joint Consultation Committee (JCC) Staff Consultation Committee (SCC) meetings Various internal communication channels "We are MTR" - MTR Retiree Network 	8	Customers' health & safety	High	Customer Safety
	10	Customer service, support, and complaint handling	High	Customers Introduction
	12	Access to essential services	High	Train Service Performance
	18	Protection of civil & political rights of staff	Low	Not reported
	19	Employment practices	Medium	Staff Introduction
	20	Conditions of work & social protection	Medium	Staff Management Approach
	21	Staff consultation and engagement	Medium	Staff Management Approach
	22	Employee and contractor health & safety	High	Staff and Contractor Safety
	23	Employee development & training	Medium	Training Programmes

Stakeholder	Engagement Channels	Key interests	Materiality Level	How MTR responds
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Environmental Interests Combines stakeholders from a variety of backgrounds, including NGOs, academic institutions and industry bodies, who have expressed interest in the environmental impacts of our activities and/or particular environmental issues.

<ul style="list-style-type: none"> Environmental Impac Assessment Consultation Environmental Impact Assessment Expert Review Ecologists' advisory services CDP Disclosure Meetings with green groups Wetland Special Advisory Committee" 	24	Prevention of pollution	High	Environmental Protection
	25	Sustainable resource use	High	Sustainable Resource Use
	26	Climate change	Medium	Climate Change
	27	Biodiversity	Medium	Ecology
	31	Community involvement and development	High	Community Engagement

Communities Our largest stakeholder category in terms of both the number of people and the range of interests represented. It includes members of local communities who are directly impacted by our activities due to their close proximity to our railway operations, property developments or network expansion projects. It also includes community groups representing sections of the wider Hong Kong society, for example youth and the elderly, as well as less advantaged members of our society such as the disabled and those living on low incomes.

<ul style="list-style-type: none"> MTR facebook Public announcements, press releases Bi-weekly meeting of CEO and senior mangement with the press Community liaison group meeting Society Link Staff volunteering "art in MTR" Partnering programmes with NGOs 	7	Customer education	High	Safety Management Approach Fares for Hong Kong Transport Operations
	8	Customers' health & safety	High	Customer Safety
	9	Sustainable products & services	Medium	Evaluation of Materiality Assessment Results
	10	Customer service, support, and complaint handling	High	Customers Introduction
	11	Customer data protection & privacy	Medium	Evaluation of Materiality Assessment Results
	12	Access to essential services	High	Train Service Performance
	24	Prevention of pollution	High	Environmental Protection
	31	Community involvement and development	High	Community Engagement
	33	Employment creation and skills development	Medium	Our People Recruitment in Hong Kong
	34	Technology development and access	Low	Not reported
37	Community investment	Low	Staff Volunteering Community Investment	

Stakeholder	Engagement Channels	Key interests	Materiality Level	How MTR responds
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Suppliers All organisations and persons who provide products and services used in our supply chain.

	<ul style="list-style-type: none"> • Supplier survey on Corporate Responsibility • Supplier audit • Industry conferences and road shows • Partnering programmes, site visits and seminars 	<ul style="list-style-type: none"> 5 Fair competition 	High	<u>Fair and Ethical Business</u>
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Business partners A sub-set within our supply chain made up of contractors (and employees of our contractors) working on behalf of the Company on network expansion and property development and investment projects. These business partners have been singled out from other suppliers because of their close collaborative relationship with the organisation.

	<ul style="list-style-type: none"> • Industry meetings, conferences, job fairs, road shows • Partnering programmes, contract and site meetings, seminars 	2 Fair operating practices	High	<u>Fair and Ethical Business</u>
		5 Fair competition	High	<u>Fair and Ethical Business</u>
		22 Employee and contractor health & safety	High	<u>Staff and Contractor Safety</u>

Regulators Bodies concerned with enforcement of laws, regulations and other standards that affect our day-to-day operations and business development, including Government departments and the Hong Kong Stock Exchange.

<ul style="list-style-type: none"> • Regulatory compliance reports • Legislative Council meetings • Advisory panels on transport and urban planning • Meetings with District Councillors • Meetings with Legislative Councillors 	2 Fair operating practices	High	<u>Fair and Ethical Business</u>
	3 Anti-corruption	High	<u>Anti-Corruption and Whistle-Blowing</u>
	7 Customer education	High	<u>Safety Management Approach</u> <u>Fares for Hong Kong</u> <u>Transport Operations</u>
	8 Customers' health & safety	High	<u>Customer Safety</u>
	9 Sustainable products & services	Medium	<u>Evaluation of Materiality</u> <u>Assessment Results</u>
	10 Customer service, support, and complaint handling	High	<u>Customers Introduction</u>
	11 Customer data protection & privacy	Medium	<u>Evaluation of Materiality</u> <u>Assessment Results</u>
	12 Access to essential services	High	<u>Train Service Performance</u>
	16 Diversity and equal opportunity	Medium	<u>Corporate Governance</u> <u>Introduction</u> <u>Staff Introduction</u>
24 Prevention of pollution	High	<u>Environmental Protection</u>	

Stakeholder	Engagement Channels	Key interests	Materiality Level	How MTR responds
		25 Sustainable resource use	High	Sustainable Resource Use
		26 Climate change	Medium	Climate Change
		31 Community involvement and development	High	Community Engagement
		32 Education and culture	Low	Case study: Island Line Extension to Western District Community Investment
		34 Technology development and access	Low	Not reported
		36 Community health	Low	Not reported
		37 Community investment	Low	Staff Volunteering Community Investment

Customers and Passengers

In the context of our rail business, “customers” and “passengers” refer to persons travelling on types of services provided by our Hong Kong transport operations. In the context of our Property business, this category also refers to residential and commercial tenants of our managed properties, and patrons of all MTR Malls.

<ul style="list-style-type: none"> Customer satisfaction surveys MTR Mobile app MTR Club MTR website and facebook page MTR hotline 	6 Fair marketing	Medium	Not reported
	8 Customers' health & safety	High	Customer Safety
	9 Sustainable products & services	Medium	Evaluation of Materiality Assessment Results
	10 Customer service, support, and complaint handling	High	Customers Introduction
	11 Customer data protection & privacy	Medium	Evaluation of Materiality Assessment Results
	12 Access to essential services	High	Train Service Performance

Political Interests

Representatives of Hong Kong’s political institutions, including District Councillors and members of the Legislative Council whom we need to update and report to on a regular basis on matters related to our operating agreement or the construction of our new railway lines.

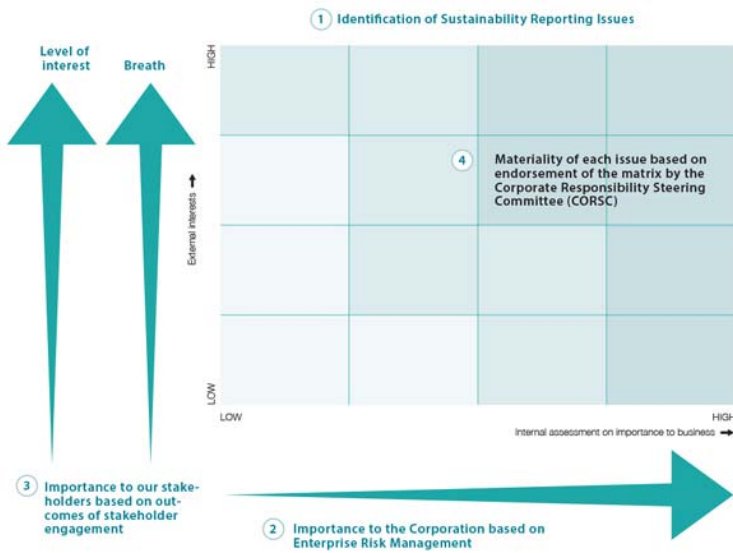
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	3 Anti-corruption	High	Anti-Corruption and Whistle-Blowing
	4 Responsible political involvement	High	Stakeholder Engagement and Materiality
	6 Fair marketing	Medium	Not reported
	10 Customer service, support, and complaint handling	High	Customers Introduction
	12 Access to essential services	High	Train Service Performance
	19 Employment practices	Medium	Staff Introduction
	21 Staff consultation and engagement	Medium	Staff Management Approach
	30 Payment from government/ tax payment	Medium	Rail plus Property Model
	31 Community involvement and development	High	Community Engagement

Materiality Methodology

The principle of materiality states that our sustainability report should address topics that reflect the Company’s significant economic, environmental and social impacts, and/or that substantively influence the assessments and decisions of our stakeholders. During 2014, we reviewed and revised our method of materiality assessment with the objective of making this sustainability report more relevant, and user-friendly. The updated methodology involves four basic steps as summarised in the following graphic.

Did you know?

In financial reporting, materiality is commonly thought of as a threshold for influencing the economic decisions of investors. The concept of a threshold is also applicable to sustainability reporting but materiality in this context refers to the shared concerns of the Company and all stakeholders, not just investors.



Materiality Level

- Low
- Medium
- High

Steps to Determine Materiality

+ Step 1. Identification of Sustainability Reporting Issues

We refer to the ISO 26000 Guidance on Social Responsibility to identify the set of all possible issues that are relevant to sustainability reporting for our organisation. For the sake of convenience, we organise the issues into six categories:

- i. Fair Operating Practices
- ii. Consumer Issues
- iii. Human Rights and Labour Practices
- iv. The Environment
- v. Supply Chain
- vi. Community Involvement and Development

+ Step 2. Importance to the Company based on Enterprise Risk Management

The issues are positioned along the horizontal axis from left to right in order of increasing risk.

Our sustainability team assessed the relationship among all of the 37 issues that were identified in the ISO 26000 standard and the top 30 enterprise risks from our enterprise risk register in order to evaluate the relative importance of each of the issues to the Company. The outcome of this assessment, which was reviewed and endorsed by the Enterprise Risk Committee during 2014, is reflected in the position of each of the 37 issues along the horizontal axis of the Materiality Matrix.

+ Step 3. Interest to Stakeholders based on Stakeholder Engagement

The issues are positioned along the vertical axis from bottom to top in order of increasing stakeholder interest.

Our sustainability team synthesised the outcomes of engagement with all categories of stakeholders during the year in order to determine the relative importance of each of the 37 issues for them.

Learn more...

ISO 26000 is an internationally recognised standard for clarifying what corporate responsibility is and translating its principles into best practices.

Please note that the position of each issue moving towards the top of the horizontal axis reflects the level of interest (for example, intense interest expressed by some stakeholders) and/or breadth of interest (for example, large number of stakeholders expressing some interest).

+ Step 4. Endorsement by the Corporate Responsibility Steering Committee

The overall position of each issue moving from the bottom left to the top right of the matrix determines its level of materiality. We have assigned low, medium and high materiality to each issue depending on its position in the matrix. The materiality assessment of all 37 issues was reviewed and approved by the CoRSC during 2014.



Evaluation of Results

Since it is not feasible for us to report extensively on every issue, we have applied the principle of materiality to help us determine what information to disclose in this report.

As a result of our assessment in 2014, three topics have been identified as non-material outliers. This means that one party, either the Company or the collective assessment of our stakeholder groups, showed high interest in the topic but the other party considered it to be of relatively low importance.

- Responsible political involvement (**issue #4**) relates to restricting behaviour that could undermine the public political process. Although our stakeholders did not appear to place importance on this topic, it is important for the Company, and our Code of Conduct addresses it directly with clear guidelines on political involvement, donations and conflicts of interest.
- Sustainable products and services (**issue #9**) relates to reducing unsustainable patterns of production and consumption. Since our core business does not give rise to any physical products, we do not consider this to be an important topic for the Company. However, we recognise that there are indirect impacts on our business of importance for some stakeholders, so we are working to promote sustainable patterns of production and consumption in our Value Chain.
- Even though customer data protection and privacy (**issue**

#11) has not been identified as a material issue for discussion in this report, we have in place a number of initiatives to address this topic that go beyond Hong Kong regulatory requirements.

