



**新創建 NWS**

**NWS Holdings Limited**

**新創建集團有限公司**

*(incorporated in Bermuda with limited liability)*

**Charitable Giving Policy**

The purpose of this Charitable Giving Policy is to establish guidelines for charitable contributions made by our organization which applies to NWS Holdings Limited (“The Group”) and all business units, ensuring that these contributions are aligned with the values and objectives of the NWS Holdings Charities Foundation Limited (“The Foundation”). Charitable contributions refer to monetary or in-kind donations, grants, and pro-bono support. All charitable contributions must comply with the Group’s Anti-Fraud and Counter-Corruption Policy and with all other applicable rules and regulations. This policy does not cover commercial sponsorship and marketing activities, other donations which fall under gift & entertainment, or charitable contributions made by employees in their personal capacity.

## Scope

This policy applies to all employees and affiliates of the organization who are authorized to initiate charitable giving on behalf of the organization.

## Guiding Principles

The Group is committed to giving back to the communities in which we operate, supporting charitable organizations that align with our core values and mission. We believe in responsible and ethical giving, and we aim to make a positive impact through our charitable contributions.

## Priority Areas

Three programme areas are prioritised that plays a crucial role in creating lasting, positive impacts and fostering a stronger and more resilient community for the future:

- **Empower for Change – Enabling for positive and sustainable transformation**
  - **Inclusive Employment** – providing opportunities and support for disadvantaged groups to access employment
  - **Future Skills** – developing skills that are relevant and valuable in the future workforce thereby to enhance their employability
- **Build for Support – Removing barriers and creating supportive environments**
  - **Mental Resilience** – enhancing the ability to adapt and cope with stress, adversity and life challenges
  - **Social Support Network** – developing support networks that offer assistance and support to those in needs, providing resources, mentoring or access to opportunities
- **Drive for the Future** – addressing challenges that affect the long-term well-being of communities
  - **Energy Efficiency Solutions** – applying energy-efficient appliances and technologies to help reducing energy consumption
  - **Circular Economy Innovations** – supporting a circular economy, including recycling technologies, waste-to-energy solutions, and sustainable product design, reduce resources consumption and minimize waste generation

**\*Emergency Relief** - Provide immediate assistance to disaster situations. The contribution for emergency relief will be distributed to the organisations from the pre-approved charities list.

## Selection Criteria

All recipients of the charitable contributions must be locally registered non-profit organizations, i.e. Section 88 of the Inland Revenue Ordinance in Hong Kong. When considering organizations for charitable contributions, the following criteria should be considered:

- **Clear Objectives:** All contributions should seek to support organizations with long-term goals and publicly communicated objectives. Clarity and transparency in organizational mission and vision are essential for ensuring alignment with the Foundation's philanthropic objectives.
- **Specialization in Service Areas:** Preference is given to organizations that are renowned for their expertise and specialization in the specific service areas for which the charitable contributions are intended.
- **Stakeholder Engagement and Volunteerism:** The supported activities or programmes encourage organizations that actively engage stakeholders and promote volunteerism within the operations. This inclusive approach fosters community involvement and amplifies the positive impact of charitable initiatives.
- **Transparency and Reporting:** Transparency and accountability in reporting practices enhance the ability to track the impact of its contributions and ensure effective utilization of resources.

We will **NOT** make charitable contributions to the following:

- **Individuals, Religious Organizations, Overseas Organizations or Political Organizations**
- **Harmful Activities:** Organizations directly involved in gambling, armaments, tobacco, recreational or illegal drugs are excluded from receiving charitable contributions, except those explicitly focused on addressing addiction or drug abuse.
- **Promote discrimination:** Organizations that discriminate on the basis of race, color, sexual orientation, gender, religion, or disability.
- **Violate Human Rights:** Organizations that do not fully respect human rights in accordance with the UN Guiding Principles on Business and Human Rights.
- **Sponsorship Events, Commercial Shows and Compliment advertising,** such as sponsorship of professional sports events, trade fairs, magazine advertisements
- Activities cause **environmental damage and cause harm to animals**
- **Inadequate Due Diligence:** Organizations that fail to complete the due diligence requirements<sup>1</sup> outlined at Appendix I: Due Diligence Checklist

---

<sup>1</sup> Please refer to **Appendix I: Due Diligence Checklist**

## **Governance**

The NWS Holdings Charities Foundation Limited (“The Foundation”) Committee<sup>2</sup> or other equivalent committee at business units oversees and guides the philanthropic initiatives, ensuring strategic allocation of resources, adherence to the charitable giving policy, and fostering impactful partnerships with communities. Business units will be responsible for overseeing their charitable contributions. However, for one-time donations exceeding HKD 200,000, endorsement from NWS Group Executives will be required.

## **Evaluation and Reporting**

The Foundation or other equivalent committee ensures applicants comply with the terms and objectives of the Charitable Giving Policy. The Foundation Secretariat or equivalent maintains a regular dialogue with the recipient organisations to evaluate the effectiveness and impact of its charitable contributions, to improve the management of existing projects and to identify future opportunities.

The Foundation Secretariat or equivalent works closely with the fund recipients to monitor and report on the progress and impact of philanthropic initiatives. It also communicates its charitable giving activities to internal and external stakeholders in a transparent manner, highlighting the impact of its donations and the organizations supported.

The recipient organization should submit the report within one month upon the completion of the project.

## **Review and Amendment**

This Charitable Giving Policy will be reviewed periodically to ensure its effectiveness and relevance. Amendments may be made to the policy as deemed necessary to reflect changes in regulatory requirements or organizational priorities.

---

<sup>2</sup> Please refer to **Appendix III: Terms of Reference for Charitable Foundation Committee**

## Appendix I: Due Diligence Checklist (For Internal Use Only)

Before making any charitable donations, the following due diligence process must be followed:

1. Is the fund applicant a registered non-profit organization with tax-exempt status in Hong Kong (or equivalent local status)?  
 Yes  No
2. Does the organisation establish >5 years?  
 Yes  No  
**Establishment Year:** Click or tap here to enter text.
3. Is the donation amount of the requested project >15% of the latest annual income?  
 Yes  No
4. Are there any negative news of applicant entity and the Board of Directors? (carry out media search on negative news and attached the records)
5.  Yes  No

### Required Documentations:

- Registered non-profit organization with tax-exempt record
- The last 2 years audited financial reports.
- Media Search Result for the entity and the Board of Directors
- A reference of the entity's governance/organisational structure
- Project Proposal

\*All information related to the due diligence process and charitable giving activities will be treated as confidential and handled in accordance with the organization's data privacy and confidentiality policies.

**Appendix II: Evaluation Metrics (For Internal Use Only)**

	<b>Descriptions</b>	<b>Weighting</b>
<b>Impact on the Community</b>	Assess the direct and indirect impact of the project on the community, such as improved access to resources, enhanced well-being, or empowerment of community members.	20%
<b>Feasibility</b>	Evaluate the feasibility of the project in terms of the resources required, timelines, and the capacity of the organization to implement the project effectively.	15%
<b>Alignment with Objectives</b>	Determine how well the project aligns with the goals and objectives of the funding organization or community.	20%
<b>Budget and Cost-Effectiveness</b>	Evaluate the proposed budget, cost-effectiveness, and the efficient allocation of resources to achieve the project's goals.	20%
<b>Collaboration and Partnerships</b>	Assess the extent to which the project leverages partnerships and collaborations with other organizations, community groups, or stakeholders.	10%
<b>Innovation and Creativity</b>	Consider the degree of innovation and creativity in the project design and approach, as well as the potential for innovative solutions to community challenges.	5%
<b>Sustainability</b>	Consider the potential for the project to create lasting change and its ability to be sustained beyond the initial funding period.	5%
<b>Accountability and Evaluation Plan</b>	Review the proposed methods for monitoring and evaluating the project's progress and impact, as well as mechanisms for accountability and transparency.	5%
		<u>100%</u>

## **Appendix III: Terms of Reference of NWS Holdings Charities Foundation Limited Committee**

### **Introduction**

#### **Our Vision**

Established in 2006, NWS Holdings Charities Foundation Limited (the Foundation), a registered charitable foundation (registered number w.e.f. 18.11.2006) under section 88 of the Inland Revenue ordinance, aims to cultivate a connected community for collective success and well-being. It aims to strengthen social networks between and among people and organisations for community-based social and economic development.

#### **Our Mission**

We concentrate on establishing and expanding the connections between societal progress and economic growth. The foundation is determined to create shared values for all stakeholders in the communities through social innovations.

#### **Our Values**

To create an environment that every individual feels a sense of belonging, support and shared purpose within the community:

**Inclusiveness** – Building an environment where individuals from all backgrounds, cultures, and walks of life feel welcomed, respected, and valued for their unique contributions.

**Collaboration and Cooperation** – working together to achieve common goals, address challenges, and create opportunities for growth and improvement and foster strong social bonds and relations among community.

**Empowerment and Engagement** – Empowering individuals to take an active role in shaping the community's future.

The objective of the Charitable Foundation Committee (“the Foundation Committee”) is to oversee and guide the foundation's philanthropic initiatives, ensuring strategic allocation of resources, adherence to the charitable giving policy, and fostering impactful partnerships with non-profit organizations dedicated to social welfare and humanitarian causes.

### **1. Membership**

- 1.1 Members of the Foundation Committee shall be appointed by the Environmental, Social and Governance Committee of the Company (the “ESG Committee”) and shall be made up of at least three members.

### **2. Secretary**

- 2.1 The Group ESG department serves as the secretariat of the Foundation Committee

### **3. Meetings and Quorum**

- 3.1 The quorum necessary for the transaction of business at a Committee meeting shall be two members of which at least one of them shall be an independent non-executive director of the Company.
- 3.2 In the absence of the Chairman of the Committee, the Committee members present shall elect one of the members to chair that meeting.
- 3.3 Only members of the Committee have the right to attend the Committee meetings. Other individuals, such as other directors of the Company, representatives from departments of the Company and external advisors may be invited to attend all or part of any Committee meeting, as and when the Committee considers appropriate.

### **4. Frequency of Meetings**

- 4.1 The Committee may convene meeting quarterly, but in any case, at least once a year

### **5. Notice of Meetings**

- 5.1 Meetings of the Committee shall be convened by the secretary of the Committee or as authorised or at the request of any member of the Committee.
- 5.2 Agenda and accompanying meeting papers should be sent in full to all members of the Committee in a timely manner and at least three (3) days before the intended date of the Committee meeting unless otherwise agreed by all members of the Committee.

### **6. Minutes of Meetings**

- 6.1 The secretary shall minute the proceedings and resolutions of all Committee meetings, including the names of those present and in attendance.
- 6.2 Minutes of Committee meetings shall be circulated to all members of the Committee within a reasonable time after the Committee meeting is held and, once agreed, to all other members of the Board.
- 6.3 A resolution in writing signed by all the members of the Committee shall be as valid and effectual as if it had been passed at a meeting of the Committee and may consist of several documents in the same form each signed by one or more of the members of the Committee. Such resolution may be signed and circulated.

### **7. Authority**

- 7.1 The Committee is authorized by the ESG Committee.
- 7.2 The Committee is authorized by the Board to seek external legal or other independent professional advice and if it considers necessary, and to invite outside parties with relevant experience and expertise to attend Committee meetings at the Company's expense. Such expenditure shall be within limits agreed by the ESG Committee from time to time.

### **8. Duties for the Foundation Committee**

- 8.1 **Policy Oversight:** The Committee is responsible for overseeing the development, implementation, and review of the charitable giving policy, ensuring alignment with the Foundation's mission, values, and legal requirements.



- 8.2 **Strategic Planning:** The Committee shall collaborate to develop strategic plans for the foundation's philanthropic initiatives, defining priority focus areas, target outcomes, and methods for evaluating the impact of charitable contributions.
- 8.3 **Partner Engagement:** The Committee will identify and evaluate potential strategic partnerships with non-profit organizations, ensuring that selected partners align with the foundation's values and ethical standards.
- 8.4 **Resource Allocation:** The Committee will review and approve the allocation of charitable contributions, ensuring that funds are directed towards initiatives and organizations that maximize social impact and community benefit.
- 8.5 **Due Diligence:** The Committee will oversee the due diligence process for recipient organizations, ensuring that selected partners meet the foundation's eligibility criteria and adhere to ethical and legal standards.
- 8.6 **Impact Assessment:** The Committee will establish mechanisms for monitoring and assessing the social and humanitarian impact of charitable contributions, fostering accountability and continuous improvement in the foundation's philanthropic efforts.
- 8.7 **Governance and Compliance:** The Committee will ensure that all philanthropic initiatives and partnerships adhere to regulatory requirements, ethical standards, and best practices in the field of charitable giving.
- 8.8 **Reporting and Transparency:** The Committee will oversee the development of reporting mechanisms to provide regular updates to ESG Committee and external stakeholders on the progress and impact of philanthropic initiatives.

**9. Conflicts of Interest**

- 9.1 Committee members are required to disclose any potential conflicts of interest related to proposed donation recommendations, strategic partnerships, or resource allocations. In the event of a conflict of interest, the concerned member will be recused from participating in the discussion and decision-making process related to the specific matter. Transparency and adherence to ethical standards regarding conflicts of interest are crucial to maintaining the integrity and credibility of the committee's decisions and actions.

**Version Control**

Effective Date	Description	Approved by
11 April 2024	Revision 0	ESG Committee