



TOM Group Limited

Biodiversity Policy



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1. Policy Statement

TOM Group Limited, its subsidiaries and controlled affiliates (collectively, “Group”) strives to enhance long-term total return for its stakeholders.

The Group is strongly committed not just to its shareholders, but also to a wide range of stakeholders including customers, suppliers, employees, banks and creditors, governments and regulators, non-government organisations and local communities.

Air, land, water and natural habitat are all valuable assets included within the bracket of biodiversity and should be protected for the well-being of mankind and the health of the planet. As a responsible global citizen, protecting nature and respecting all lives on earth while operating responsibly are at the core of the Group’s corporate strategy.

This Policy applies across the operations of the Group. The Group also encourages its suppliers, business partners, and where applicable, its customers, to respect the practices outlined in this Policy, with a goal of furthering their own efforts at biodiversity protection stewardship.

2. Approach

The Group is committed to complying with or exceeding statutory requirements relevant to biodiversity in the markets where the Group operates.

By referencing international and local biodiversity principles, including the European Union Biodiversity Strategy for 2030¹, Hong Kong Biodiversity Strategy and Action Plan (2016-2021)² and New Nature Conservation Policy³, this Policy provides an overarching guidance to the Group’s operations. This Policy should also be read in conjunction with the TOM Group Sustainability Policy and TOM Group Environmental Policy, which provide a comprehensive review of the sustainability strategy of the Group.

The Group’s position in managing its direct biodiversity related impacts includes:

2.1. Protect Natural Resources

- The Group recognises the importance of natural resources and is supportive of anti-deforestation, biodiversity protection, conservation and restoration.
- The Group is committed to preventing pollution to land, water and air, and undertaking biodiversity assessments where relevant.

1 EU Biodiversity Strategy for 2030: https://eur-lex.europa.eu/resource.html?uri=%20cellar:a3c806a6-9ab3-11ea-9d2d-01aa75ed71a1.0001.02/DOC_1&format=PDF

2 Hong Kong Biodiversity Strategy and Action Plan 2016-2021: https://www.afcd.gov.hk/english/conservation/Con_hkbsap/files/HKBSAP_ENG_2.pdf

3 Introduced by the Government of the Hong Kong Special Administrative Region in 2004: https://www.afcd.gov.hk/english/conservation/con_nnep/con_nnep.html



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- The Group is supportive of relevant and appropriate biodiversity conservation and environmental protection programmes and initiatives. Efforts are regularly reviewed to ensure their efficiency through goal setting and monitoring of key performance indicators.

2.2. Minimise Impact of Business Activities

- The Group recognises that its business activities both contribute to, and are impacted by, biodiversity loss, and thus shall operate responsibly to promote sustainable use of natural resources and take practical and appropriate measures to minimise impact of its business activities on the environment and natural habitat.
- The Group is committed to actively developing, incorporating and implementing environmentally-sustainable products and processes with potential commercial applications where possible, and to continuing the exploration and inclusion of biodiversity gain philosophy into the operational ethos across the business.

2.3. Enhance Awareness and Engagement

- The Group is committed to enhancing awareness and promoting protection of biodiversity among employees, customers, supply and value chain, and other related stakeholders.
- The Group values stakeholder engagement and will partner with different stakeholders to promote relevant biodiversity programmes and initiatives.

3. Review

This Policy will be reviewed regularly or as required to ensure its relevance and effectiveness. This Policy is posted on the website of the Company.

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