



2021

Environmental, Social and Governance Report

Frontage Holdings Corporation

(Incorporated in the Cayman Islands with limited liability)

Stock Code : 1521



Notes on the Preparation of the Report

The 2021 Environmental, Social and Governance Report of Frontage Holdings Corporation (hereinafter referred to as the " Report") is the third ESG report published by Frontage Holdings Corporation (together with its subsidiaries, hereinafter referred to as "Frontage Holdings", the "Company", or "we"). This Report summarizes the progress Frontage Holdings has made in fulfilling its ESG responsibilities in 2021.

Basis of preparation

This Report has been prepared in accordance with the *Environmental, Social and Governance Reporting Guide* (dated January 2022) issued by The Stock Exchange of Hong Kong Limited (hereinafter referred to as the "HKEx").

Reporting principles

This Report follows the reporting principles of the HKEx's *Environmental, Social and Governance Reporting Guide*, including:

Materiality This Report uses a materiality analysis to identify the topics on which it focuses, and mainly reports matters related to environmental, social and governance issues that are sufficiently important to investors and other stakeholders.	Quantitative Approach This Report indicates measurable KPIs. Quantitative information in this Report is accompanied by a narrative, explaining its purpose, impact, and giving comparative data where appropriate.
Balance The contents of this Report reflect objective facts, and disclose indicators involving both positive and negative information.	Consistency This Report provides an explanation of the meaning of the disclosed ESG key quantitative performance indicators and the basis for their calculation and assumptions; and the indicators used in different reporting periods are consistent as far as possible to depict the Company' s performance objectively.

Scope of the Report

Organizational scope: The Report covers Frontage Holdings and its subsidiaries that are covered in the Company's annual reports and financial statements.

Time range: This Report covers the period from January 1, 2021 to December 31, 2021.

Data sources

The data and cases in the Report are taken from the original records or financial reports of the Company.

Report language

This Report is published in traditional Chinese and English respectively. In case of any inconsistency across versions, the traditional Chinese version shall prevail.

Reliability assurance

The Board of Directors represents that the contents of this Report are free from any materially false or misleading statements or major omissions.

Contact and feedback

The Company values your comments and suggestions on this Report or the Company's ESG performance. Interested parties are welcome to contact us or share comments at any time. You can reach us at:

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Contents

Notes on the Preparation of the Report	01
Description of the Company's Operations	03
Environmental, Social and Governance Policies	07
1 Environment	13
1.1 Emissions	15
1.2 Environmental Protection and Resource Usage	18
1.3 Climate Change	19
2 Employment and Labor Practices	21
2.1 Employment Management	23
2.2 Health and Safety	26
2.3. Training and Development	28
3 Operating Practices	29
3.1 Supply Chain Management	31
3.2 Product Liability	32
3.3 Business Ethics and Anti-corruption	36
4 Community	37
4.1 Community Investment	38
List of Laws and Regulations	39
Data-based Performance	41
Index Table of The Environmental, Social and Governance Reporting Guide of the Stock Exchange of Hong Kong (HKEx)	46

Description of the Company's Operations

Frontage Holdings is a Contract Research Organization ("CRO"). The Company, through its subsidiaries, provides integrated, science-based research and analytical and development services for pharmaceutical companies throughout the drug discovery and development processes. The Company works closely with its customers to provide flexible solutions to meet their drug development goals. In doing so, the Company implements rigorous scientific, technological and quality standards to meet our customers' needs. Please refer to our 2021 annual report for more information about our business operations.



Environmental, Social and Governance Policies

Environmental, Social and Governance Policies

Sustainable Development

We are committed to improving the well-being of the public by upholding the values of "quality, integrity, innovation and care". In doing so, we are continually seeking to improve the Company's performance on a sustainable basis. The Company incorporates ESG principles and sustainable development policies into its vision, mission and values.

Values of Frontage Holdings



The Company's work on ESG and sustainable development is based on four pillars:

- "Environment, Health and Safety" ("EHS");
- "Business Continuity and Crisis Management";
- "Operational Excellence"; and
- "Corporate Social Responsibility (CSR)".

Under each pillar, the Company has implemented standard operating procedures ("SOPs") in each jurisdiction in which it operates to ensure implementation.

Sustainable Development Methodologies of Frontage Holdings



The Company attaches great importance to ESG principles, and has formulated a sustainable development strategy that incorporates ESG concepts into its daily operations and management. The Company has made commitments in the areas of hazardous waste emissions, greenhouse gas emission reductions and improved resource efficiency, and is actively setting quantifiable management targets.

The Board of Directors is responsible for overseeing the Company's sustainable development strategy and ESG goals, including in the following ways:

- To guide and supervise the development and implementation of ESG-related policies of the Company and its subsidiaries;
- To establish and maintain a suitable and effective ESG risk management and internal control system;
- To identify and determine key ESG topics of the Company, and provide advice and necessary support for actions to be taken on the topics;
- To evaluate and determine the ESG goals of the Company, and review the progress achieved in the annual report; and
- To review on a regular basis the Company's performance on key ESG topics.

Stakeholder Communication and Material Topic Analysis

Stakeholder Communication

The Company maintains communication channels with all stakeholders to address their legitimate needs and concerns.

Topics of Concern to Stakeholders and Channels of Communication

Key stakeholders	Topics of concern	Channels of communication
Government departments and regulatory agencies (National Health Commission of the People's Republic of China, National Medical Products Administration of the Peoples Republic of China, U.S. Food & Drug Administration, etc.)	<ul style="list-style-type: none"> • Compliance • Business ethics • Business performance 	<ul style="list-style-type: none"> • Submission of recorded documents • Compliance inspections and checks • Regular meetings with local government representatives • Forums, conferences and seminars
Shareholders and investors	<ul style="list-style-type: none"> • Economic performance • Information transparency • Risk management 	<ul style="list-style-type: none"> • Company website • Company announcements • Annual shareholders' meetings • Annual and interim reports
Customers (pharmaceutical businesses)	<ul style="list-style-type: none"> • Product service and quality • Customer information and privacy protection • Marketing accountability • Intellectual property rights protection 	<ul style="list-style-type: none"> • Company website • Direct communication with customers • Customer feedback and complaints
Partners (industry associations, business partners, suppliers, etc.)	<ul style="list-style-type: none"> • Compliance • Supply chain management • Contribution to industrial development • Business ethics 	<ul style="list-style-type: none"> • Selection and evaluation • Procurement process • Performance assessment • Regular communication with business partners (e.g. via emails and meetings)
Employees	<ul style="list-style-type: none"> • Employee training and development • Employee rights and benefits • Occupational health and safety protection 	<ul style="list-style-type: none"> • Training and induction training • E-mail and suggestion box • Regular meetings • Employee performance evaluation • Team-building activities
Community and the public (Non-governmental organization, media, etc.)	<ul style="list-style-type: none"> • Community wellbeing and public welfare • Response to climate change • Pollution reduction • Resource conservation 	<ul style="list-style-type: none"> • E-mail • Telephone • Company announcements • Social network platforms • Company website • Social media • Charitable donation and volunteer service • Community activities

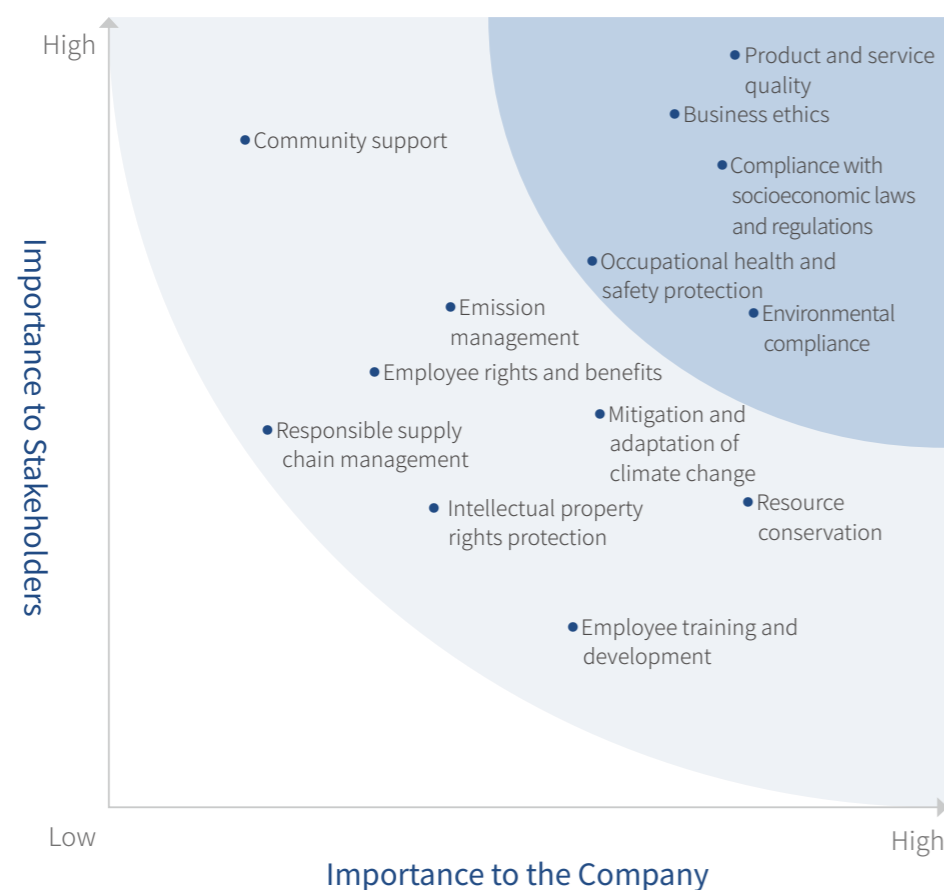
Analysis and identification of material topics

The Company considers the materiality of various topics based on expert opinion and taking into account stakeholder requirements and priorities. Based on this analysis, in 2021, the Company identified the following material topics as the focus of company management and report disclosure.

Material Topic Identification Process



Material Topic Matrix



Statements of Adjustments on Material Topics

Material topics in 2020	Material topics in 2021	Statement of Adjustments
Exhaust gas emission	Emission management	The previously separated topics of exhaust gas emission and waste management are now merged, while also incorporating a new topic of wastewater discharge.
Waste management		
Greenhouse gas emission	Mitigation and adaptation of climate change	The topics of greenhouse gas emission and climate change are merged given that they entail the same set of materiality management procedures.
Climate change		
Energy efficiency	Resource conservation	The previously separated topics on energy efficiency, water resource and sewage, and utilization of material are merged and streamlined under the broader category of resource conservation.
Water resource and sewage		
Utilization of materials		
Labor rights	Employee rights and benefits	The previously separated six topics that all center on the rights and interests of employees as a type of stakeholder are merged into employee rights and benefits.
Labor-capital relation		
Employee retention		
Diversity and equal access to opportunities		
Anti-discrimination		
Prevention of child and forced labor	Product and service quality	The previously separated five topics that all center on product and service quality (including marketing, product and management of product and service labeling) are merged into product and service quality, as they are all oriented toward customers as a type of stakeholder.
Customer satisfaction		
Customer service quality and complaint handling		
Customer health and safety		
Compliance with regulations on marketing and product and service labeling		
Customer privacy and data protection		



1. Environment

1. Environment

1.1 Emissions

In order to ensure that it complies with applicable laws and regulations on exhaust gas emission, wastewater discharge, soil pollution reduction and solid waste management, the Company has implemented standardized management procedures. These procedures combine both prevention and control (with a focus on prevention), in view of applicable rules and regulations regarding safe disposal of wastewater, exhaust gas and solid waste, including national laws, regulations and standards on hazardous waste pollution prevention and control.

To our knowledge, there has not been any investigation targeting the Company by relevant governmental authorities throughout 2021 for environmental violations; nor has Frontage been subject to major administrative or criminal penalties, or urged by the relevant government departments to alter behaviors within a time limit, suspend production, relocate or close; and nor has it been involved in major litigation or any seizure, detention, freezing, mortgage, or pledge of its prime assets due to environmental issues.

The Company has designated the EHS Department to coordinate environmental management affairs and set up environmental management goals of "100% waste disposal and recycling rate" and "zero pollution accident rate" to reduce environmental harms during its operation.

Frontage Holdings has formulated a series of management systems such as the *Waste Management System and the Accountability System on Prevention and Control of Environmental Pollution by Waste* to manage the generation, reduction and treatment of emissions across its entire production cycle. It has also developed the Emergency Response Plan for Environmental Incidents to prepare a response to environmental emergencies and provide a standard process for the handling of environmental emergencies. The Company has also established an early-warning system, which classifies environmental pollution into different levels, sets up prevention and response measures for different levels of accidents, and designates certain personnel responsible for preventing, reporting and managing relevant matters in order to minimize the impact of emergencies on the environment and avoid accident escalation.

Laboratory environmental management is also an important component of the Company's environmental emissions program. The Company has appointed certain persons to be responsible for waste management in its *Waste Management System, Responsibility System on Prevention and Control of Environmental Pollution by Waste, Laboratory Waste Treatment Process* and other systems, and established processes to ensure that solid wastes produced in the Company's operations do not harm the environment.

Discharge of Exhaust Gas and Wastewater

The main air pollutants emitted as a result of the Company's operations include methanol, acetonitrile, hydrogen chloride, ethanol, non-methane hydrocarbon, xylene, toluene, formaldehyde, dichloromethane, trichloromethane, acetone, ammonia, hydrogen sulfide, sulfur dioxide, nitrogen oxides and particulate matters. The Company is in compliance with the applicable standards in countries/regions of operation,

and the internal *Pollution Source Emission Management System* for emission management, setting emission standards and implementing measures to manage, supervise and inspect waste gas, wastewater and noise in the plant.

Wastewater discharge during the Company's operation mainly includes production wastewater and domestic sewage, and the testing indexes of wastewater pollutants involved are mainly pH value, chemical oxygen demand (COD), suspended solids (SS), ammonia nitrogen (NH₃-N) and total phosphorus (TP). The Company is in compliance with the applicable standards and the relevant wastewater discharge management system formulated internally to manage its emissions.

The Company is in compliance with all applicable environmental laws and regulations as well as its internal exhaust gas and wastewater management systems. The Company manages wastewater and exhaust gas discharge and has created emission reduction targets to ensure that the discharge of wastewater and exhaust gas generated during its operations and production processes complies with applicable environmental laws and regulations.

The Company uses biosafety cabinet and other technical systems to collect biological and organic exhaust gas generated in its laboratory, which is then transmitted to its treatment system for disposal. The Company uses sampling and monitoring platforms to closely monitor the exhaust gas, including volatile organic compounds and non-methane hydrocarbons, to ensure that the emission complies with applicable environmental standards.

Chemicals and residual solvents involved in laboratory experiments are properly stored in appropriate waste chemical containers by the Company, and any wastewater containing relevant substances is appropriately processed before it is discharged to the drainage channel.

Solid Waste

The Company has formulated a *Waste Management System, Responsibility System on Prevention and Control of Environmental Pollution by Waste and Laboratory Waste Treatment Process* to manage and to dispose of wastes generated during its operations, as appropriate. The Company has taken measure to ensure that unlawful outflow from any channels, which may pose a potential threat to the environment and community, will not take place. The Company has introduced new technologies and equipment in its facilities to reduce the generation of solid waste.



Objectives of solid waste emission:

- 100% compliant disposal of general solid waste.
- Hazardous waste is entrusted to qualified organizations for compliant disposal as required, supporting the target of reduction in a progressive manner.

Most of the hazardous wastes produced during the operations of the Company are products of clinical, biological and chemical experiments conducted in the laboratories. The Company stored this waste in sealed containers and transports it to designated storage areas for safekeeping to avoid unlawful pollution. The Company has appointed site safety directors or chemical waste coordinators to monitor the disposal of relevant wastes in accordance with applicable laws and regulations and internal SOPs, and has hired qualified disposers to collect waste at storage sites as applicable regulations require.

Waste Classification and Disposal

Classification of wastes		Disposal methods
General wastes	Waste paper boards, domestic wastes, etc.	Waste paper boards are recycled, while domestic wastes are disposed of by environmental departments as appropriate.
Hazardous wastes	Waste orifice plates, waste plasma samples, waste gloves, waste medicine bottles, waste reagent bottles, waste solvents, waste water for washing containers, waste pipetting tips, waste activated carbons, waste centrifugal test tubes, etc.	The EHS department monitors the generation, warehousing, storage, transfer and disposal of hazardous wastes, and entrusts qualified organizations for disposal.

1.2 Environmental Protection and Resource Usage

The Company has proactively identified and assessed the impact of its business activities on the environment and resources, and put in place policies on resource usage to improve its resource usage efficiency. According to the assessments, the Company's business activities would not have any material impact on the environment and natural resources.

The Company has embodied the concepts of environmental protection and green and low-carbon development into its whole process of R&D and operation. It has established a sound environmental emergency management system and supportive mechanisms and procedure documents to standardize its efforts toward environmental protection. In addition, the Company has developed a series of management rules to control resource utilization and consumption reduction throughout its production process. Energy consumption objectives have been set to promote its usage efficiency.



Objectives of energy use:

- Progressive reduction in energy consumption per unit of revenue.

Objectives of water use:

- Progressive reduction in water consumption per unit of revenue.

The main energy consumed in the production process of the Company include diesel, electricity, natural gas and steam.

The Company has mainly relied on municipal water supply, with no inappropriate behavior in gaining access to or using it. In order to save water, the Company has managed to step up use of recycled water. Suzhou Frontage Pharmaceuticals Development Co., Ltd, a subsidiary of the Company, has put recycled water into use, reusing the condensed water from air-conditioning as the circulating water for cooling towers in summer, with a consumption of about 7t/d which has been significantly lower than before.

1.3 Climate Change

There is growing concern from members of the scientific community and the general public that an increase in global average temperatures due to emissions of greenhouse gases and other human activities have or will cause significant changes in weather patterns and increase the frequency and severity of natural disasters. In order to prevent, mitigate and manage such climate and environmental risks arising out of the Company's operations, the Company has delegated the EHS Department to provide oversight of the integration and consideration of climate related issues, risks and opportunities and other appropriate ESG objectives into the Company's strategy, policies, procedures, practices and decision making process, as well as the execution of our climate change management system comprising of four major components: governance, strategy, risk management, and objectives and performance.



The Company's use and greenhouse gas emissions are as follows:

Sources of the Company's Greenhouse Gas Emission

Scope	Emission sources
Scope I	Waste diesel and natural gas emitted by electric generators, steam generators and vehicles
Scope II	Outsourced fuel gas, steam and electricity
Scope III	Greenhouse gas emissions from value chains like employee commuting

Major Climate Change-related Risks Facing the Company

Physical risks	Acute physical risks: Extreme weather events (flood, frost) disrupting power and water supply or inducing losses with plants and equipment; and supply chain disruptions leading to reduced or disrupted capacity (e.g. production halt, transportation difficulties, supply chain failures), write-offs and abnormal retirements of assets (e.g. damages to properties and assets at "risk" sites).
	Chronic physical risks: Abnormal power supply due to continuous high temperature caused by climate change.
Transformation risks	Policy and legal risks: Increased costs of compliance to meet regulatory requirements, and equipment transformation and operational changes as a result of lower emission caps and more stringent regulations.
	Technical risks: Application of new equipment and technologies for environmental protection.
	Market risks: Increased production costs from changes in raw material prices (including energy and water) and emission requirements (disposal of hazardous waste and waste water).



Objectives of greenhouse gas emission:

- Progressive reduction in greenhouse gas emissions per unit of revenue.

The Company has taken the following mitigation measures to manage the foregoing climate related risks:

- Improve production technology and equipment on an ongoing basis by replacing ageing electrical appliances of high power consumption and low efficiency with high-efficiency and energy-saving ones in a timely manner;
- Control the consumptions of water and electricity with frequent inspection and maintenance of water equipment and facilities;
- Enhance statistical management of water and electricity consumption to detect anomalies ;
- Examine energy consumption and greenhouse gas emissions on a regular basis, disclose relevant performance in time and actively communicate with stakeholders in the form of ESG reports and related announcements;
- Enhance employees' awareness of resource saving in their daily work;
- Promote the adoption of green office scenarios such as online collaboration and electronic business cards.



2. Employment and Labor Practices

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2.1 Employment Management

Frontage Holdings complies with applicable laws and regulations on salary and dismissal, recruitment and promotion, working hours, holidays, equal access to opportunities, diversity, anti-discrimination and employee benefits and welfare, and has formulated related management policies. In 2021, there has been no violation of laws and regulations regarding recruitment of employees of the Company.

Employment Practices

The Human Resources Department is responsible for the overall management of employee including, but not limited to, recruitment, training, promotion, discipline, compensation, benefits, and termination of employment. The Company is an equal opportunity employer and complies with all applicable federal, state, and local fair employment practices laws. The Company strictly prohibit and does not tolerate discrimination against any employees, applicants, or any other covered persons because of race, color, religion, creed, national origin or ancestry, ethnicity, sex (including gender, pregnancy, sexual orientation, and gender identity), age, physical or mental disability, citizenship, past, current, or prospective service in the uniformed services, genetic information. All of our employees, temporary workers, and individuals doing business with us are prohibited from engaging in unlawful discrimination.

The Company also exercises affirmative action to employ and to advance in employment, all persons regardless of race, color, religion, sex, national origin, age, marital status, genetic information, sexual orientation, gender identity, disability or protected veteran status, and to base all employment decisions only on valid job requirements.

In addition, Frontage Holdings has formulated a series of management rules on employment, salary, working hours and holidays, promotion, dismissal and other aspects related to its employees to ensure equality and diversity.

Employment and Employee Management Rules of the Company

Type	Management rules and measures
Recruitment, promotion and dismissal	<ul style="list-style-type: none"> The Company has developed <i>Recruitment Management Rules</i>, <i>Management Rules on Personnel Employment Relationship</i>, <i>Performance Management Rules</i> and <i>The Employee Handbook</i> to standardize the management of employee recruitment, labor relations and other personnel employment relations while working to improve employee and organizational performances sustainably. Recruitment is cooperatively completed by the employing department and the Human Resources Department. In case of a vacant post, internal employees enjoy the same opportunities as external candidates.

Type	Management rules and measures
Recruitment, promotion and dismissal	<ul style="list-style-type: none"> Promotion and post transfer of employees rely on the results of their performance appraisals. If any employee engages in a situation where the Company shall terminate the employment relationship as stipulated by applicable laws and regulations, the Company can do so in accordance with the laws and regulations.
Salary	<ul style="list-style-type: none"> The <i>Employee Handbook</i> specifies the structure of salary and bonus, and the rules on withholding personal income tax as well as paying social insurance and provident fund for employees according to laws. The Company purchases supplementary commercial health insurance and critical illness insurance for its employees, while providing them with meal allowances, travel allowances, wedding gift money, holiday welfares and other benefits. The Company has developed <i>Performance Management Rules</i>, specifying that employee salary and bonus are based on their performance appraisals. The Company issues long-term service awards and medium- and long-term incentives to employees who meet the assessment criteria for employee (especially key talent) retention purposes.
Working hours and holiday	<ul style="list-style-type: none"> Contents on Attendance Management in the <i>Employee Handbook</i> stipulates and explains the rules of working hours, national holidays, annual leaves, sick leaves, personal leaves and other matters related to working hours and holidays. Employees enjoy national legal holidays, annual leaves, marriage leaves, maternity leaves, breastfeeding leaves, funeral leaves and additional, fully-paid sick leaves for a certain period in accordance with applicable laws. Overtime working hours as recognized by the Company shall be converted as compensatory leaves.
Equal access to opportunities, diversity and anti-discrimination	<ul style="list-style-type: none"> In the <i>Employee Handbook</i>, "equal employment, employment at will and fair competition" are defined as the basic principles to be observed by the Company. The principle of "equal employment" demonstrates that "any discrimination on any ground such as race, color, political or religious affiliation, nationality, gender, sexual orientation, age, marital status, family relations, disability or other legally protected situations shall be prohibited." "Policies and Measures against Discrimination and Harassment" in the handbook explains in detail the Company's diversity and anti-discrimination policies.

Compliance with Labor Rules

Frontage Holdings abides by the laws and regulations on child labor and forced labor, and has formulated relevant management policies. In 2021, there was no violation of laws and regulations regarding the prevention of child labor and forced labor in the Company. The Human Resources Department of the Company is responsible for supervising management in this aspect, and has formulated management rules to effectively avoid the use of child labor and forced labor.

The Company's Management Rules on Preventing Child Labor and Forced Labor

Type	Management rules and measures
Prevention of child labor	<ul style="list-style-type: none"> The Company prohibits the use of child labor in any post and observes relevant employment procedures. The Company has developed the <i>Management Rules of Prohibiting the Employment of Child Labor and Underage Workers</i>, formulating policies and remedies to effectively avoid recruitment of child labor in any form. Where minors aged between 16 and 18 can be recruited as applicable laws and regulations allow, the Company does so on the premise of compliance. During recruitment, the Human Resources Department strictly verifies the candidates' identities, checking their ID cards, photos or household registration information as necessary, to confirm that their identity information is genuine before registration for entry.
Prevention of forced labor	<ul style="list-style-type: none"> The Company stipulates under the principle of "employment at will" in its <i>Employee Handbook</i> that the establishment of a labor relation is premised on the willingness of both the employer and the employee, and the employee is free to choose occupations at his or her own will. Forced labor shall be completely eradicated.

2.2 Health and Safety

The Company has rigorously implemented the policy of "safety first, prevention foremost, and comprehensive governance", strictly executed laws and regulations on work safety and worked to ensure production safety, so as to provide employees with safe, healthy and hygienic working and living conditions, as well as protecting employees from occupational hazards. In 2021, there has been no violation of applicable laws and regulations on employees' health and safety by the Company. No work-related fatalities occurred in the past three years (including the reporting year).

The Company's EHS Department is tasked with ensuring occupational health. Its jobs include identifying occupational health factors, assessing related risks, declaring occupational diseases, and daily supervision and inspection, etc. The Company's Human Resources Department is responsible for organizing physical examinations for employees vulnerable to occupational disease factors before they take up and when they leave their posts, and having qualified organizations evaluate occupational hazards in the Company's premises. In addition, the Facility Department of the Company is responsible for the maintenance of relevant health protection facilities to ensure their normal functioning.

The Company has formulated a series of system specifications such as *Occupational Health Management System*, *Occupational Sanitary Control System*, *Work Safety Inspection System*, and *Safety Risk Hierarchical Management and Control System* to protect the health of employees, improve the working conditions and environment, control various types of occupational disease hazards, prevent occupational diseases, and ensure that it can produce and operate safely and soundly.

Identification of Hazard Factors

Occupational hazards categorized as statutory occupational diseases as identified by the Company include chemical factors, physical factors, and factors that can cause acute illnesses.

Occupational Hazard Factors

Type	Content
Chemical factors	<ul style="list-style-type: none"> Methanol, acetonitrile, dimethyl sulfoxide, hydrochloric acid, isopropanol, toluene, xylene, dichloromethane, ethyl acetate, chloroform, methyl tert-butyl ether, ether, ammonia, acetone, sodium hydroxide, formaldehyde, hydrogen peroxide, acetic acid, carbon tetrachloride, chlorine dioxide, etc.
Physical factors	<ul style="list-style-type: none"> Noise, high temperature, low temperature
Factors that can cause acute illnesses	<ul style="list-style-type: none"> Isopropanol, formaldehyde, acetic acid, etc.

Health Management Measures

In order to protect its employees from occupational diseases, the Company has put in place a full range of occupational health management measures. In addition, in 2021, the Company organized a series of occupational health and safety training sessions, such as laboratory safety training, hazardous chemical safety training, fire emergency evacuation and fire extinguisher training, laboratory biosafety training, occupational health training, etc. As to safety, there were training sessions on hazardous chemical safety introducing basic knowledge on hazardous chemicals as well as their management procedures, safe use, and emergency disposal of leakage. Also provided were occupational health training, with sessions on applicable laws and regulations, hazards of occupational diseases and related cases, and individual protection.



Identify and monitor occupational disease risks <ul style="list-style-type: none"> Regularly identify and evaluate occupational hazard factors and vulnerable working places in various departments in accordance with applicable laws and regulations. Prepare files tracking occupational hazards based on the identification and evaluation results of such hazards. The EHS Department declares to the government on an annual basis by filling out required information in the "Occupational Diseases Hazardous Items Reporting System" in support of supervision and audit of relevant departments. 	Organize occupational health training and exercises <ul style="list-style-type: none"> After joining the Company, new employees are informed of potential occupational hazards in work and their effects as well as occupational diseases prevention and treatment through Notification of Occupational Hazards, in order to increase their safety awareness. Induction training on occupational health and safety is provided for new employees in accordance with applicable regulations. Corporate and departmental training is provided on a regular basis on relevant policies and regulations to inform employees of how to identify occupational health and safety symbols, the use of labor protection articles, and safe technical operations.
Provide occupational health protection facilities and devices <ul style="list-style-type: none"> Workplaces such as laboratories and animal facilities are equipped with effective protection facilities and devices and personal protective articles in accordance with occupational health and safety requirements. Laboratories are equipped with facilities for safety protection such as fume hoods, exhaust hoods, biological safety cabins, emergency sprinklers and eyewash equipment. Employees in labs are provided with labor protection items such as gloves and masks. 	Develop special emergency plan for occupational diseases <ul style="list-style-type: none"> A special emergency plan for occupational hazards has been developed. Emergency evacuations and firefighting emergency drills are conducted on a regular basis. In the event of an occupational hazard or a poisoning accident, the department thereof timely organizes self-rescue, mutual rescue, and first aid as required and immediately report to the EHS Department which coordinates accident reporting, investigation and handling. Any discovery of an occupational disease patient or a suspected one is reported to the upper authorities by the EHS Department in time.

2.3. Training and Development

The Company attaches great importance to the cultivation of talents, and regards employee development as an important driving force for its development. It is committed to providing employees with training that can help facilitate the Company's development and employees' personal growth, while encouraging employees to improve themselves proactively as well. Additionally, it has formulated the *Performance Management System* and specified the management rules for employee training in the *Employee Handbook*.

Employee Training System and Its Implementation

Type	Content	Cases in 2021
Internal training	<ul style="list-style-type: none"> All new employees are provided with induction training programs, including introduction to the company and each department and training of related systems, etc. Technical training includes professional competence training and post-oriented skills training. The SOPs of each business module are followed when training on SOP, laws and regulations, job skills, etc. are carried out and archived at Quality Assurance. Non-technical training includes anti-corruption, performance management, data management, and production management. 	<ul style="list-style-type: none"> On November 25, 2021, the induction training for new employees was conducted, and the relevant systems of the company and each department were introduced.
External training	The Company encourages employees to sign up for profession-related external training programs, and provides them with support in terms of expenditures and time.	<ul style="list-style-type: none"> Supported employee to attend Security Production Training on November 17, 2021. Supported employee to attend CISSP Certified Information System Security Specialist online course training. Supported finance staff to attend POWER BI training.



3. Operating Practices

3. Operating Practices

3.1 Supply Chain Management

The Company values supply chain management and understands the importance of suppliers in enabling it to maintain a high standard of service offered to customers. The Company has effectively managed the quality of suppliers by reviewing their performance on a regular basis to evaluate the quality of their products and services, and established proper mode of cooperation that induces lower costs and cooperation risks. With advanced technology and abundant procurement channels, the company manages its suppliers effectively to ensure stable delivery cycle and supply sources.

The Company's suppliers mainly engage in dealings of laboratory instruments and equipment, reagents and consumables, services, software, engineering projects, etc. Before each partnership starts, the Company requires the supplier to provide its business license, management license, production license, etc., and strictly reviews its qualifications, social credits, and past performances. A supplier identified as qualified is then asked to provide relevant information according to the questionnaire of the Company, before it can be added to the database for alternative suppliers after a new supplier application has been initiated by the procurement specialist in the OA system and approved by the procurement manager and the internal control department.

In terms of suppliers' environmental and labor risk management, the Company requires its suppliers to abide by the Supplier Code of Conduct, which promotes its business principles at environmental, social and governance fronts, including environmental management, labor and human rights, and anti-corruption. By the end of the reporting period, the Company had signed a new *Supplier Code of Conduct* statement with all major suppliers.



The Company performs assessments and evaluations on an annual basis of its existing suppliers, reviews their qualifications, prices, services, delivery period, and after-sales services, etc., grades them on the rating scale according to their performance in different dimensions, and manages them hierarchically according to their grades after a cross-departmental joint evaluation.

Starting with the establishment of its own environmental awareness, the Company prioritizes cooperation with suppliers using simplified packaging of raw materials to urge them to provide environment-friendly products and services to reduce solid wastes. In addition, where compliance with laws and regulations is not compromised, the Company strives to minimize the use of paper contracts, invoices and other unnecessary paper documents with suppliers as much as possible.

3.2 Product Liability

Frontage Holdings is committed to becoming the first-choice R&D outsourcer for its customers, providing best-in-class services and technologies, in order to support customers in their continuous pursuit of innovation and product improvement. In 2021, the Company has not been involved in any violation of laws and regulations regarding product liability.

Meanwhile, Frontage Holdings has formulated a series of management rules to improve its performance in an all-round manner, covering product quality, promotion, marketing, and customer communication, etc. The Company has strictly abided by industry norms and formulated the *Rules on the Management of External Promotion and Advertisement*. In the spirit of the Rules, the Company has been dedicated to product promotion and marketing based on its past project experience with regard to quality control.

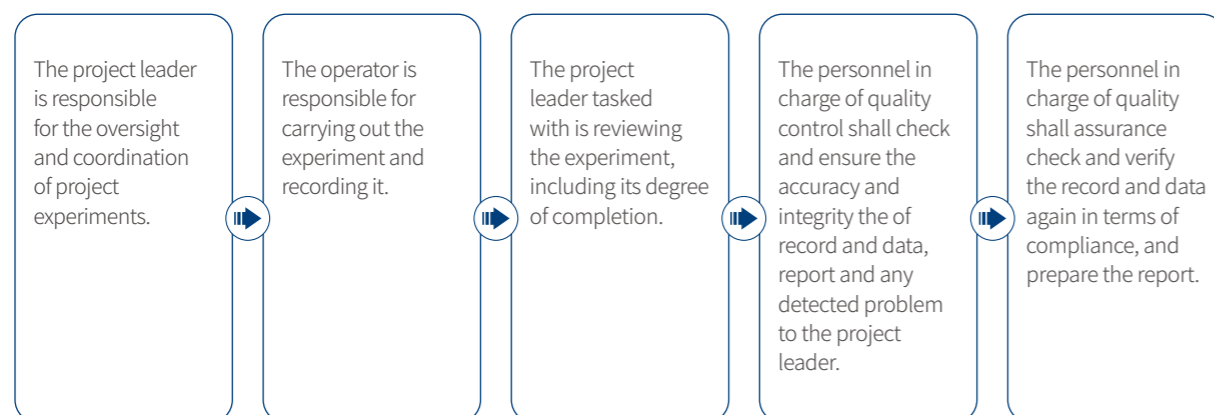
The Company has worked closely with customers to protect private data and information involved in the cooperation, in order to prevent customer information leakage or unauthorized acquisition or use in any form. No confidential information, including research reports, procedures and data, shall be disclosed to third parties without prior approval from the customers. The Company has set authorization restrictions on the access to information and data, and designated full-time personnel in charge of collecting, classifying, storing, tracking and retrieving information in the archives. In addition, the Company has required all employees to keep Company affairs strictly confidential during their employment. Frontage Laboratories (Shanghai) Co., Ltd. ("Frontage Shanghai") has obtained ISO27001 certification for its information security system.

Quality Management

The Company has implemented SOPs such as the *Quality Management Standard Procedures and the Implementation of Compliance in Research* to standardize the quality management procedures on various R&D services. As the Company's business does not involve product manufacturing, no product recall procedure has been established.

The quality management system of Frontage Shanghai has obtained ISO9001 certification.

Quality Management Flow



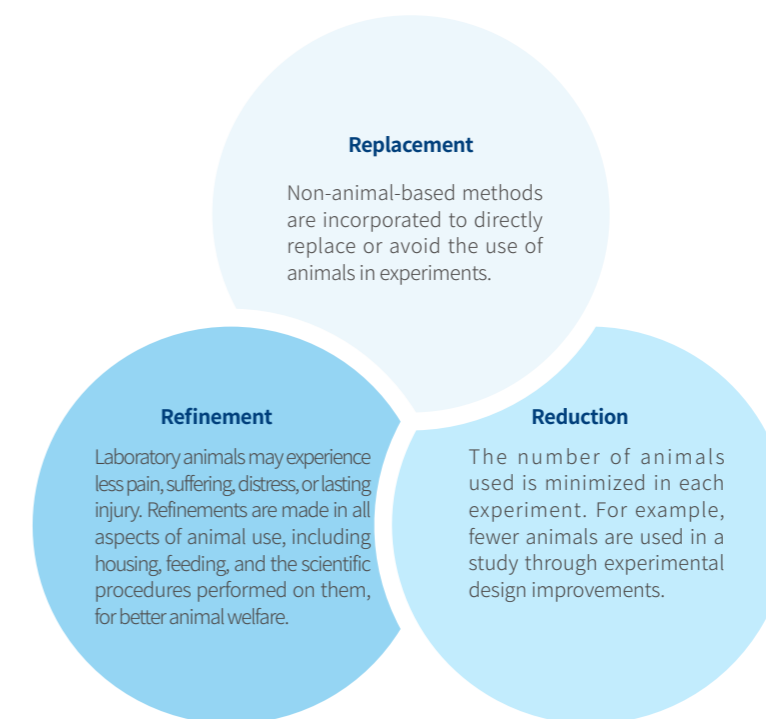
Animal Welfare

The Company provides product development services during drug discovery and development. As major regulatory agencies around the world, including the FDA of the United States, EMA of Europe and NMPA of China, require all new drugs to be evaluated in clinical trials with both animals and human beings before marketed, the Company is involved in the use of laboratory animals. Our laboratories around the world strictly abide by international and/or local regulations/guidelines related to animal welfare and are committed to improving the applicable standards in this regard.

The Company has established the Institutional Animal Care and Use Committee ("IACUC") to evaluate and oversee the use of and care for animals by its subsidiary institutes. The IACUC is made up of attending veterinarians, a president, scientist members, non-scientist members and members from the public. IACUC members are responsible for providing animal welfare training for lab practitioners, reviewing and approving animal use programs and related research, and examining the qualification of laboratory animal suppliers and animal-related products. In addition, the IACUC which conducts a check of animal care and use programs and animal-related facilities every six months has the right to suspend or terminate any animal experimental program that violates animal welfare.

The Company is dedicated to a proper balance between animal protection and scientific advances. With this in mind, it has implemented the "3R principles" (Replacement, Reduction, and Refinement) in its laboratory practices across the board, with animals used only when there is ample scientific evidence proving that there is no other way to produce reliable data on the basic safety and efficacy of the drugs in development. The Company has also launched a "5 Freedom" program to promote welfare of laboratory animals and improve their wellbeing.

3R Principle for Animal Welfare



Replacement

Non-animal-based methods are incorporated to directly replace or avoid the use of animals in experiments.

Refinement

Laboratory animals may experience less pain, suffering, distress, or lasting injury. Refinements are made in all aspects of animal use, including housing, feeding, and the scientific procedures performed on them, for better animal welfare.

Reduction

The number of animals used is minimized in each experiment. For example, fewer animals are used in a study through experimental design improvements.

5 Freedom Plan

Animals always have access to fresh water and food and be free from hunger and thirst so that they can stay healthy and active.

Suitable environments are provided to protect them from discomforts, including proper shelters.

Prevention or rapid diagnosis and treatment is provided to the animals to avoid causing them pain, injury or disease.

Adequate space, appropriate facilities, and companionship of peers are provided to allow a life as normal and natural as possible for the animals.

Conditions and treatments are provided to avoid fear, pain and mental distress.

Intellectual Property Management

The Company follows the laws and regulations in countries/regions of operation, and has established a legal team to deal, on a daily basis, with legal affairs such as trademarks, patents, copyrights and domain names.

The Company attaches great importance to preserving its own IPRs and R&D achievements. In daily management, the Company works to improve employees' awareness of intellectual property laws and avoid infringement of others' intellectual property rights with training sessions, occasional risk warnings, and review of various promotional materials released to the public. The Company protects all kinds of IPRs disclosed, received and involved in transactions and cooperation with customers, suppliers and other partners through the agreement and signing of documents. To date, the Company has not infringed on others' intellectual property rights and has not been subject to relevant administrative penalties and court decisions.

Customer Service

In order to manage customer complaints and improve customer satisfaction, the Company has formulated the *Customer Satisfaction Survey Rules* to improve customers' experience by collecting feedbacks, opinions and suggestions from them, solving problems that emerged during service provision, and addressing defects with current services. The Company's Marketing Department or Sales Department conducts customer satisfaction surveys on a regular basis. The *Customer Satisfaction Survey Implementation Plan* and the *Customer Service Satisfaction Questionnaire* have been implemented to collect customers' opinions on the sales services, the level of proficiency, and the service quality, etc., of which statistical summaries and analysis have been conducted based on which the *Customer Satisfaction Survey Results and Analysis Report* is prepared. According to the opinions and suggestions put forward by customers according to the survey results, each department has formulated corresponding corrective and preventive measures which have been implemented for improvements.

3.3 Business Ethics and Anti-corruption

The Company conducts anti-corruption and business ethics management work in accordance with laws and regulations in countries/regions of operation. In 2021, the Company has not been involved in any breach of applicable laws or regulations on preventing bribery, extortion, fraud and money laundering activities.

The Company has formulated the *Rules on Related-party Transactions* in strict accordance with applicable laws and regulations to promote business ethics and anti-corruption awareness among its employees participating in procurement, marketing, sales and other vulnerable business segments. It has specified rules for expense reimbursement, approval procedures, and policies on teambuilding activities and business trips in its *Employee Handbook*, to properly manage employee behaviors in terms of traveling, working and business receptions, while putting in place strict procedures for the application of expenses on gifts and meetings, in an attempt to root out corruptions of any kind.

For tip-offs received from an internal or external informant, the Company sets up a special auditing team to conduct investigations on the matters of concern and report progress to the management on a regular basis. The Company's internal auditors strictly observe professional ethics and keep the informant's identity and information confidential; they do not disclose any information on the informant in the investigation, reporting and internal discussion for his or her safety.

Frontage Holdings has set up an internal audit department to review and assess the level of business ethics and anti-corruption performance of procurement, sales and other business departments at least once a year. The modules subject to audits include but are not limited to price inquiry and comparison procedures, supplier management procedures, contract management, and price management, etc.

The Company operates in a wide range of legal and business environments, many of which pose challenges to our ability to conduct our business operations with integrity. As an organization, we strive to conduct ourselves according to the highest standards of ethical conduct. Throughout our operations, the Company seeks to avoid even the appearance of impropriety in the actions of our directors, officers, employees, and agents. In order to uphold business integrity, we have a set of rules in place to discourage bribery and corruption practices, including the receipt of gifts, rewards, entertainment, and commission or other forms of corruptive actions with our vendors, suppliers or business partners. Our emphasis on business ethics fosters a collaborative relationship with our clients and suppliers, and we have zero tolerance for violations of our business integrity. Employees who violate our policy will be subject to disciplinary actions, including termination of employment. Any potential conflict of interests with the Group should be disclosed upfront. Our policy with respect to business integrity is set forth in our *Employee Handbook*. Violations can result in various sanctions or punishments, such as verbal warnings, written warnings or termination of employment. In addition, we encourage our employees to report unlawful business practices through the established reporting channel.

During the Reporting Period, the Group was not aware of any non-compliance or legal cases brought regarding any laws and regulations such as the US Foreign Corrupt Practices Act, Anti-money Laundering Law of the PRC and the Anti-unfair Competition Law of the PRC and other laws and regulations relating to bribery, extortion, fraud and money laundering.



4.1 Community Investment

Community and social responsibility, which involves the Company's commitment to promoting social development and establishing positive values, is the fourth pillar underpinning the Company's sustainable development.

The Company is committed to local and community development and proactively seeks ways to improve social and community wellbeing. While dedicated to its business operations, Frontage Holdings, as a member of the pharmaceutical and health community, always keeps in mind its mission to the society, persists in giving back to the community and promoting social development with professional capabilities, and focuses on social contributions in the field of medicine and health.

4. Community

List of Laws and Regulations

Chinese Regulations
Law of the People's Republic of China on the Prevention and Control of Atmospheric Pollution
Integrated Emission Standard of Air Pollutants (DB31/933-2015)
Emission Standards for Odor Pollutants (DB31/1025-2016)
Law of the People's Republic of China on Prevention and Control of Water Pollution
Integrated Wastewater Discharge Standard (DB31/199-2018)
Environmental Protection Law of the People's Republic of China
Law of the People's Republic of China on the Prevention and Control of Environmental Pollution Caused by Solid Waste
Measures for Hazardous Waste Transfer and Management
Measures for Medical Waste Management of Medical and Health Institutions
Standard for Pollution Control on Hazardous Waste Storage (GB18597-2001)
Classified Catalogue of Hazardous Waste (2021 Edition)
Classified Catalogue of Medical Waste (2021 Edition)
Emission Standard for Industrial Enterprises Noise at Boundary (GB12348-2008)
Labor Law of the People's Republic of China
Labor Contract Law of the People's Republic of China
Individual Income Tax Law of the People's Republic of China
Regulations on Paid Leave for Employees
Special Provisions on Labor Protection for Female Employees
Law of the People's Republic of China on the Protection of Minors
Provisions on Prohibition of Child Labor
Law of the People's Republic of China on the Prevention and Control of Occupational Diseases
Provisions on the Supervision and Administration of Occupational Health at Work Sites
Work Safety Law of the People's Republic of China
Regulations on Work-Related Injuries Insurance
Product Quality Law of the People's Republic of China
Pharmacopoeia of the People's Republic of China
Advertising Law of the People's Republic of China
Trademark Law of the People's Republic of China
Data Security Law of the People's Republic of China

Regulations for the Administration of Affairs Concerning Experimental Animals
Guidelines on the Humane Treatment of Laboratory Animals
Patent Law of the People's Republic of China
Copyright Law of the People's Republic of China
Criminal Law of the People's Republic of China
Company Law of the People's Republic of China
Anti-Unfair Competition Law of the People's Republic of China
Law of the People's Republic of China on Donations for Public Welfare
Anti-Money Laundering Law of the People's Republic of China
U.S. Regulations
Clean Air Act
Clean Water Act
Solid Waste Disposal Act
Uniformed Services Employment and Reemployment Rights Act
Pay Transparency Nondiscrimination Provision
Employee Rights for Workers with Disabilities Paid at Special Minimum Wages
Fair Labor Standards Act
Title VII of the Civil Rights Act
Age Discrimination in Employment Act
Occupational Safety and Health Act
Family and Medical Leave Act
Section 503 of the Rehabilitation Act
Animal Welfare Act and Animal Welfare Regulations
PHS Policy on Humane Care and Use of Laboratory Animals
Foreign Corrupt Practices Act
Other Regulations
Guide for the Care and Use of Laboratory Animals
AVMA Guidelines for the Euthanasia of Animals
Paris Convention for the Protection of Industrial Property
Berne Convention for the Protection of Literary and Artistic Works
Universal Copyright Convention
Patent Cooperation Treaty

Data-based Performance

Environmental performance^[1]

Indicators	Unit	Y2019	Y2020	Y2021
Energy and Water Use				
Electricity consumption ^[2]	MWh	9,928.49	12,810.92	16,716.73
Electricity consumption density	MWh/USD'000	0.0989	0.1018	0.0906
Natural gas consumption	cubic meters	1,146,048.00	1,146,048.00	1,259,460.00
Natural gas consumption density	cubic meters/ USD'000	11.4131	9.1093	6.8285
Steam consumption	tons	75.00	85.00	150.00
Steam consumption density	kg/USD'000	0.7469	0.6756	0.8133
Gasoline consumption for owned vehicles	liters	6,539.00	5,678.00	11,445.00
Diesel consumption for owned vehicles	liters	200.00	200.00	200.00
Water consumption	tons	33,507.00	35,234.20	45,529.56
Water consumption density	tons/USD'000	0.3337	0.2801	0.2469
Emissions				
Emissions of exhaust gases	cubic meters	21,675,000.00	52,020,000.00	502,222,000.00
Industrial wastewater discharge	cubic meters	30,097.00	29,986.00	35,106.11
Chemical oxygen demand (COD) discharge	tons	0.13	0.22	0.59
Biochemical oxygen demand (BOD) discharge	tons	0.03	0.04	0.11
Ammonia nitrogen (NH ₃ -N) discharge	tons	0.01	0.01	0.02
Amount of hazardous waste generated	tons	80.24	84.61	177.13
Hazardous waste generation density	kg/USD'000	0.7991	0.6725	0.9604
Amount of non-hazardous waste generated	tons	147.60	151.90	162.80
Non-hazardous waste generation density	kg/USD'000	1.4699	1.2074	0.8827
Non-methane hydrocarbon emissions	kg	39.00	50.00	2,172.40
Greenhouse gas emissions	tCO ₂ e	7,804.20	9,566.91	11,971.11

Indicators	Unit	Y2019	Y2020	Y2021
Scope I greenhouse gas emissions	tCO ₂ e	2,221.72	2,296.36	2,461.80
Scope II greenhouse gas emissions	tCO ₂ e	5,582.48	7,270.55	9,509.31
Greenhouse gas emission intensity	tCO ₂ e/USD'000	0.0777	0.0760	0.0649

Notes:

[1] The scope of environmental data for 2021 is consistent with the scope of the consolidated financial statements. 2019 and 2020 environmental data only includes data for the Shanghai, Suzhou, and the U.S. divisions, and excludes data for the Wuhan and HeYa divisions of Frontage China. Due to the expansion of the scope of data statistics, the data changes significantly.

[2] The electricity and water consumption data for 2019 are not available for the Shanghai division, so the electricity and water consumption data for 2019 only includes statistics for the Suzhou division.

[3] GHG emissions are calculated with reference to Appendix II: Environmental Key Performance Indicators Reporting Guidelines (May 2021), the latest version of the Environmental, Social and Governance Reporting Guidelines of the HKEx.

In particular, for the Scope I GHG calculation, the data from the U.S. Environmental Protection Agency's Emission Factors for Greenhouse Gas Inventories are used for the U.S. natural gas emission factors, and the data from the Corporate Greenhouse Gas Emissions Accounting Methodology and Reporting Guide for Power Generation Facilities (Revision 2022) are used for the Chinese natural gas emission factors.

For the Scope II GHG calculation process, 0.559 tCO₂/MWh is used as the U.S. purchased electricity emission factor; China's electricity emission factor refers to the data in the Corporate Greenhouse Gas Emissions Accounting Methodology and Reporting Guide for Power Generation Facilities (Revision 2022), which is 0.6101 tCO₂/MWh in 2019-2020 and 0.5810 tCO₂/MWh in 2021.

Employee performance^[1]

Indicators	Unit	Y2021
Employment		
Total number of employees (Including Part time)	people	1,414
Number of employees: Full-time	people	1,364
Number of employees: Part time	people	50
*Note: The following figures do not include part-time employees		
Male	people	620
Female	people	744
<30y	people	630
30-50y	people	519
>50y	people	215
Mainland China	people	755
Hong Kong, Macau, Taiwan and others	people	609
Employee turnover rate ^[2]	%	28.52
Turnover rate of male employees	%	33.23
Turnover rate of female employees	%	24.60
Turnover rate of employees <30y	%	31.90
Turnover rate of employees of 30-50y	%	28.52

Indicators	Unit	Y2021
Turnover rate of employees >50y	%	18.60
Employee turnover rate in mainland China	%	25.96
Employee turnover rate in Hong Kong, Macau, Taiwan and others	%	31.69
Employee Health and Safety		
Number of workdays lost due to work-related injuries	days	101
Number of employees who died as a result of work-related injuries	people	0
Number of penalties for violating employment and labor laws and regulations	counts	0
Employee Training		
Employee training coverage rate ^[3]	%	100
Training coverage rate for male employees	%	100
Training coverage rate for female employees	%	100
Training coverage of general employees	%	100
Training coverage of mid-level employees	%	100
Training coverage of senior-level employees	%	100
Training hours per employee	hours	12.44
Training hours per male employee	hours	11.14
Training hours per female employee	hours	13.52
Training hours per general employee	hours	12.46
Training hours per mid-level employee	hours	12.14
Training hours per senior-level employee	hours	13.43

Notes:

[1] Employee statistics include full-time labor contract employees, full-time labor dispatch employees and part-time employees.

[2] Employee turnover rate = number of employees in each category lost during the reporting period / number of employees in each category at the end of the reporting period × 100%.

[3] Employee training coverage rate = number of employees trained in each category during the reporting period / total number of employees in each category at the end of the reporting period × 100%.

Product performance

Indicators	Unit	Y2021
Percentage of sold products recalled due to safety and health issues	%	0
Number of complaints received about products and services	counts	12
Complaints handling rate for products and services	%	100
Total number of violations in marketing (including advertising, promotion and sponsorship)	counts	0

Indicators	Unit	Y2021
Total number of health and safety, labeling violations for products and services provided	counts	0
Number of substantiated complaints of invasion of client privacy and loss of client data	counts	0
Total number of violations of client privacy	counts	0

Supply chain performance

Indicators	Unit	Y2021
Total number of suppliers	counts	1,579
Number of suppliers in Mainland China	counts	1,069
Number of suppliers in Hong Kong, Macau, Taiwan and others	counts	510
Proportion of suppliers evaluated for environmental, labor, and ethical issues ^[1]	%	19
Proportion of suppliers who passed environmental, labor, and ethical assessments ^[2]	%	100

Notes:

[1] Proportion of suppliers evaluated for environmental, labor, ethical issues = Number of suppliers evaluated for environmental, labor, ethical issues / Total number of suppliers × 100%.

[2] Proportion of suppliers who passed environmental, labor, and ethical assessments = Number of suppliers who passed environmental, labor, and ethical assessments / Number of suppliers who received environmental, labor, and ethical assessments × 100%.

Community support performance

Indicators	Unit	Y2021
Charitable contributions	US\$ in million	0.2
Hours of volunteer service	hours	100

Anti-corruption

Indicators	Unit	Y2021
Number of anti-corruption lawsuits filed against the company and employees and concluded	counts	0
Proportion of board members covered by anti-corruption training	%	100
Proportion of employees covered by anti-corruption training	%	85.85
Number of hours of anti-corruption training per employee	hours	2.00

Index Table of The Environmental, Social and Governance Reporting Guide of the Stock Exchange of Hong Kong (HKEx)

Part B: Mandatory Disclosure Provisions

Mandatory Disclosures	Report Sections
Governance Structure	Sustainable Development
Reporting Principles	Notes on the Preparation of the Report
Reporting Scope	Notes on the Preparation of the Report

Dimensions, General Disclosures and Key Performance Indicators	Report Sections
General Disclosure A1	1.1 Emissions, List of Laws and Regulations
KPI A1.1	1.1 Emissions
KPI A1.2	1.3 Climate Change
KPI A1.3	1.1 Emissions
KPI A1.4	1.1 Emissions
KPI A1.5	1.1 Emissions, 1.3 Climate Change
KPI A1.6	1.1 Emissions
General Disclosure A2	1.2 Environmental Protection and Resource Usage
KPI A2.1	1.2 Environmental Protection and Resource Usage
KPI A2.2	Data-based Performance
KPI A2.3	1.2 Environmental Protection and Resource Usage
KPI A2.4	1.2 Environmental Protection and Resource Usage
KPI A2.5	1.2 Environmental Protection and Resource Usage
General Disclosure A3	1.2 Environmental Protection and Resource Usage
KPI A3.1	1.1 Emission, 1.2 Environmental Protection and Resource Usage
General Disclosure A4	1.3 Climate Change
KPI A4.1	1.3 Climate Change
General Disclosure B1	2.1 Employment Management, List of Laws and Regulations
KPI B1.1	2.1 Employment Management
KPI B1.2	2.1 Employment Management
General Disclosure B2	2.2 Health and Safety, List of Laws and Regulations
KPI B2.1	Data-based Performance
KPI B2.2	Data-based Performance

Dimensions, General Disclosures and Key Performance Indicators	Report Sections
KPI B2.3	2.2 Health and Safety
General Disclosure B3	2.3 Training and Development
KPI B3.1	2.3 Training and Development
KPI B3.2	2.3 Training and Development
General Disclosure B4	2.1 Employment Management, List of Laws and Regulations
KPI B4.1	2.1 Employment Management
KPI B4.2	2.1 Employment Management
General Disclosure B5	3.1 Supply Chain Management
KPI B5.1	Data-based Performance
KPI B5.2	3.1 Supply Chain Management
KPI B5.3	3.1 Supply Chain Management
KPI B5.4	3.1 Supply Chain Management
General Disclosure B6	3.2 Product Liability, List of Laws and Regulations
KPI B6.1	Data-based Performance
KPI B6.2	3.2 Product Liability
KPI B6.3	3.2 Product Liability
KPI B6.4	3.2 Product Liability
KPI B6.5	3.2 Product Liability
General Disclosure B7	3.3 Business Ethics and Anti-corruption, List of Laws and Regulations
KPI B7.1	Data-based Performance
KPI B7.2	3.3 Business Ethics and Anti-corruption
KPI B7.3	3.3 Business Ethics and Anti-corruption
General Disclosure B8	4.1 Community Investment
KPI B8.1	4.1 Community Investment
KPI B8.2	Data-based Performance



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