

# **Sustainability Report 2024**







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# 2024 at a Glance



## Progressing the Sustainable Finance Ecosystem

- Enhanced climate-related disclosure requirements based on the IFRS S2 Climate-related Disclosure Standard
- Promoted board diversity by ending single-gender boards among listed issuers in Hong Kong
- Published consultation conclusions on Corporate Governance Code enhancements to strengthen board effectiveness, independence and diversity
- Announced the implementation of mandatory emissions reporting aligned with the EU Carbon Border Adjustment Mechanism for all LME-listed aluminium brands
- Introduced Gold Standard carbon credits on Core Climate, providing investors and corporates with more options to support climate projects

## Building Climate Resilience and Mitigation

- Achieved carbon neutrality in our operations through using electricity from renewable sources and purchasing carbon credits
- Implemented severe weather trading arrangements which enhanced the climate resilience of our operations and markets
- Rolled out market-wide initiatives to reduce paper consumption through new proposals for a paperless listing regime and depository vault modernisation
- Submitted science-based GHG emissions reduction targets to SBTi for validation
- TKO Data Centre achieved BEAM Plus Existing Building Platinum Rating





## Lifting up our People and Community

- Ensured a strong talent pipeline through leadership development programmes
- Hosted 40+ activities and organised a marketplace during the HKEX Global Wellness Month, supporting our employees' health and wellness
- Promoted an inclusive and engaging workplace through a variety of HKEX Network events including all-level fitness classes, a new corporate dragon boat team, seminars on family care and LGBTQ+ celebrations
- Increased our employee engagement score in the HKEX Pulse Survey by 10%
- Supported 25+ new community projects run by charities and social enterprises under the HKEX Charity Partnership Programme and the HKEX Impact Funding Scheme

## Operating our Business Responsibly

- Rolled out a firm-wide cyber awareness campaign
- Enhanced our Third-party Risk Management Policy and guidance to ensure a responsible and ethical supply chain
- Set up a new café kiosk, Cafe 388, run by a charitable organisation dedicated to promoting mental health and supporting people with different abilities

# Message from our Chairman



In 2024, global sustainability was surrounded by the same mix of opportunities, challenges and uncertainty that shaped most other global affairs.

Extreme weather events, such as record-breaking heatwaves, served as alarming reminders of the powerful impact of climate change. Additionally, geopolitical volatility and fragmentation cast doubt on the ability to address global environmental and social challenges in a unified way.

Notwithstanding these challenges, the global sustainability movement continued to progress. With many countries submitting their updated Nationally Determined Contributions after COP29, more opportunities emerged for businesses – and especially the finance sector – to drive innovative financial partnerships and scale up private funding. At the same time, more jurisdictions are adopting harmonised climate disclosure standards, such as IFRS S2. And in Asia, the progress that is being made in developing innovative green tech, from electric vehicles to solar, battery and wind power technologies, has been astounding, with China alone accounting for one-third of global investment in clean energy.

Two important points are clear: one, despite the much-highlighted geopolitical fragmentation, the world still very much wants progress on sustainability; and two, the private sector has a unique opportunity to lead the way.

The stakes are especially high in Asia, where rapid development makes the region an important indicator of global sustainability efforts.

I took up the role of Chairman of HKEX in 2024, and as I look back on the year, I am extremely proud to lead an organisation that sees sustainability as a necessity for the long-term health and resilience of its business, markets and community. As a company, HKEX contributes to the global sustainability agenda by reducing the negative, and increasing the positive, impacts of our business on our ecology and community. However, what truly sets us apart from other corporates is that HKEX is also Asia's leading financial market infrastructure. This puts us in a unique position to play a significant role for the region and by extension, the rest of the world.

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Operating in a region that is most critical to the success of global sustainability, having an unrivalled role in connecting China and global markets, building platforms that connect capital with sustainability products and opportunities, and setting standards and frameworks for our listed companies community – what we do has a long-term ripple effect on the businesses, communities, markets, economies and societies to which we are deeply connected to. We take this responsibility very seriously.

In 2024, we continued to make progress in driving scalable change in four strategic areas:

1. Progressing the sustainable finance ecosystem by driving new rules and standards, product development, education and advocacy;
2. Building climate resilience and mitigation, from the way we operate our business to working with our value-chain partners on the decarbonisation journey;
3. Elevating our people and our community by investing in talent development, fostering a diverse and inclusive workplace and through HKEX Foundation, by giving back to the community that HKEX is deeply rooted in; and
4. Adopting sustainable practices and high standards of integrity in our business operations.

The details of our activities are outlined in this report. I hope you find it informative and interesting.

The world that business leaders and boards are facing is complex. In terms of sustainability, there are great challenges to overcome but also great opportunities to be captured. I like to think that a commitment to the sustainability of businesses and markets has been the single thread that has run through my entire career, from when I was an auditor and then a regulator to my current role. I am immensely proud and energised to be Chairman of an organisation that has such a significant impact on the sustainability of markets, economies and the community – and to be working with a team who are so thoroughly committed to this cause.

None of the progress we made during the year was achieved in isolation. I would like to take this opportunity to thank all our stakeholders – investors, clients, issuers, regulators and market participants – for working with us to advance the sustainability agenda. We look forward to continuing to partner with you all to progress the sustainability of our markets and community in the years to come.

**Carlson TONG**

Chairman

Hong Kong, 27 February 2025



# Message from our CEO



In 2024, HKEX continued to make steady progress in creating market-shaping initiatives and driving scalable change in progressing the sustainable finance ecosystem in the region; building climate resilience and mitigation; supporting our people and community; and ensuring we operate our business responsibly.

But what stood out this year is that we did this with a refreshed approach to sustainability that ensures we have the right structure, governance and strategy in place to keep sustainability at the core of everything we do. From restructuring our sustainability teams and creating a new Group Chief Sustainability Officer role, to further defining our unique and dual roles in the sustainability agenda: the first as an enabler – an organisation that has an impact on the sustainability journeys of other companies, markets and communities – and the second as an exemplar – a company that is leading by example by pursuing its own sustainability journey.

This resulted in steady progress throughout the year, with many notable milestones along the way.

## Sustainable Finance

The role of capital markets in the global sustainability agenda is significant and multi-faceted, from implementing and upholding sustainability standards to providing sustainable investment tools and products for market participants and fundraising platforms for companies at the cutting edge of sectors that are key to building a more sustainable world – sectors such as green technology, medical science and food technology.

As a market regulator and operator, HKEX is an enabler – it supports and guides more than 2,600 listed companies on their sustainability journeys with clear standards, frameworks and guidance for ESG disclosure, application and implementation.

A highlight of this in action in 2024 was our publication of the conclusion of a market consultation on Climate Disclosure Requirements, reflecting IFRS S2. While some economies have mandated IFRS S2 alignment through their legislatures, we are proud that Hong Kong is the



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As the global sustainability journey moves towards an implementation stage, the role of capital markets is becoming increasingly central to success. As a leading international exchange, HKEX will continue to play its part by putting sustainability at the core of our business.

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first market in the world to introduce it through its exchange. More importantly, this supports the Government's vision of a set of local sustainability reporting standards that are aligned with the ISSB Standards – an important step towards a common global language to understand climate transparency.

Another major milestone in how we exercised our unique role in shaping the wider ecosystem was the changing of our Corporate Governance Code to make us the first international exchange to ban single-gender boards in our market. Announced in 2022, the deadline for companies to end single-gender boards was end of 2024, and I am happy to report that almost all our issuers have complied. As corporates face an increasingly complex world, the need for diverse perspectives on their boards is becoming more critical than ever. Diversity improves risk management and makes companies more resilient.

Sitting at the heart of Asia's capital markets, HKEX has also been driving its sustainability agenda beyond the region through the LME – the world's centre for the pricing, hedging and trading of metals. Metals are critical to green technologies and sustainably sourced metals are critical to the success of the green transition.

In 2024, the LME put forward several proposals to enhance the transparency of and access to sustainable metals. For example, it mandated emission reporting for LME-listed aluminium, in line with the EU Carbon Border Adjustment Mechanism.

## Climate Resilience and Mitigation

In addition to being an enabler of the sustainable development of financial markets, at HKEX, we also strive to be an exemplar of best practices in our operations and advocacy. Climate resilience and mitigation is a key area of focus in helping to deliver a net-zero global economy.

I am pleased to report that our net-zero journey is on track, and we achieved our carbon neutrality target in 2024. During the year, we continued to decarbonise our operations and work with business partners along the value chain, abating our carbon emissions by using renewable electricity, improving energy efficiency and offsetting unabated material emissions via quality carbon credits sourced from our carbon marketplace, Core Climate. We have also submitted our science-based targets to SBTi for validation and will announce our approved targets in due course.



## People and Community

We know the success of our business is dependent on the success of our people and our community. From our talent development programmes to our wellness initiatives, we are building an organisation that prioritises well-being, inclusivity and personal growth. We have talent development programmes that are tailored to colleagues at different stages of their careers. We organised more than 100 wellness events during the year, catering to different interests, from meditation and yoga to conventional sports and, my personal favourite, dragon boating. Moreover, we approached employee wellness from a holistic perspective, with activities that support mental, physical, financial and other types of well-being.

We are also proud of the impact that HKEX Foundation has been making on the wider community through its Charity Partnership Programme and Impact Funding Scheme. By the end of 2024, the Foundation had made \$535 million in charitable donations since its launch, funding more than 120 community projects ranging from fostering social inclusion and financial literacy and supporting the underprivileged, to addressing climate change and advocating for biodiversity.

## Responsible Business

At HKEX, we understand that to ensure sustainability, our businesses and operations have to be resilient and reliable, particularly as our operations form the backbone of Hong Kong's financial markets. We continue to invest in operational resilience to provide fair and orderly trading during record trading volumes, market volatility and severe weather events.

At the same time, we will continue to reinforce a culture of responsibility, transparency and accountability through policies and training in different areas such as business ethics, data privacy, cybersecurity and third-party sustainability.

## Appreciation

At HKEX we have a group of extremely dedicated staff from different backgrounds who work together towards a common purpose – to connect, promote and progress our markets and the communities they support for the prosperity of all. I would like to thank all our colleagues for their hard work and commitment to our purpose. The HKEX sustainability journey would be impossible without their support.

As the global sustainability journey moves towards an implementation stage, the role of capital markets is becoming increasingly central to success. As a leading international exchange, HKEX will continue to play its part by putting sustainability at the core of our business.

I hope you enjoy reading about our sustainability activities in 2024. And I look forward to working with all our stakeholders to have a positive impact on all the markets, economies, businesses and communities that HKEX is connected to.

### Bonnie Y CHAN

Director and Chief Executive Officer

Hong Kong, 27 February 2025



# About HKEX

HKEX is a purpose-driven company. Our commitment to the long-term development of our business is articulated in our Purpose: “To connect, promote and progress our markets and the communities they support for the prosperity of all.”

We are unique in our multiple roles and responsibilities with our networks touching on businesses, communities, markets and economies. As a world-leading exchange operator and market regulator, we regard ourselves as an important facilitator and enabler for the sustainable development of the financial markets and communities where we operate.

## Market Regulator

We regulate listed issuers; administer listing, trading and clearing rules in the stock market in Hong Kong and regulate the operation of the LME’s metal and metal derivatives markets.

## Employer

With our corporate values front and centre, we are a responsible and caring employer of more than 2,500 employees worldwide.

## Exchange Operator

As one of the world’s largest exchange groups, we offer a range of equity, derivative, commodity, fixed income and currency markets.

## Corporate Citizen

Deeply connected to the communities in which we operate, we are an active and engaged corporate citizen, committed to giving back to society.

## Listed Company

As a publicly listed company, we are fully committed to operational excellence, creating long-term value for our shareholders and key stakeholders.

We have a presence in Hong Kong, Mainland China, London, Singapore, New York and plan to open an office in Riyadh in 2025, and are publicly listed on the Main Board of The Stock Exchange of Hong Kong Limited. A list of our principal subsidiaries, as of 31 December 2024, can be found on p.178 of the [HKEX 2024 Annual Report](#). Investors can find our latest financial information, business analysis, regulatory disclosure and shareholder information in the Annual Report and the [HKEX Group website](#).



# Our Approach to Sustainability

Sustainability is a necessity for the long-term health and resilience of our business, markets and communities. As Asia's leading financial markets infrastructure, HKEX is in a unique position to facilitate a sustainable future for the prosperity of all.

At HKEX, we have many responsibilities – as a regulator, exchange operator and listed company – and have a unique role to play in driving positive change in our markets and communities while achieving our business objectives. To us, sustainability is more than an aspiration; it is a strategic and operational necessity for the long-term development of our business, markets and communities.

We are determined to facilitate the development of sustainable financial markets and build a resilient business that places sustainability as its core, embedding responsible practices into every aspect of the organisation, while creating shared success for our stakeholders and our planet.

Our approach to sustainability is guided by our Purpose. We think and act upon these responsibilities in a systematic, structured and collaborative way, making sure we embed our sustainability-drive mindset in everything we do. To this end, in 2024, HKEX adopted a holistic corporate responsibility (CR) framework to strengthen the integration of ESG considerations in our business and operations.

## Governance

The HKEX Board of Directors monitors the Group's operating, financial and ESG performance, reviews the Group's compensation policies and succession planning, and ensures that a positive and progressive culture, effective ESG policies, and appropriate and effective internal control and risk management systems are in place. Simultaneously, the Board takes on the overall responsibility for overseeing and reviewing the Group's sustainability strategy,

including climate-related risks and opportunities, and their respective policies. It also reviews the Group's performance and progress against corresponding targets and objectives at least annually.

The Board is regularly provided with training and updates to ensure that they are equipped with the appropriate skills and competencies to oversee our sustainability-related strategies. To strengthen the integration of ESG considerations into HKEX's strategy and operations, in 2024, the Board approved a new CR management framework and discussed our net-zero strategy and the review of our philanthropic strategy.

The Corporate Responsibility Committee (CR Committee), formerly known as the Corporate Social Responsibility Committee, is delegated by the Board to oversee matters concerning the CR management framework and policies. The CR Committee consists of six Board members, including the HKEX Board Chairman, who acts as the CR Committee's chairman, the Chief Executive Officer of HKEX and four other Board members. The CR Committee is responsible for providing directions on and overseeing the development and implementation of HKEX's CR strategy and initiatives. The CR Committee's Terms of Reference are available on the [HKEX Group website](#). Details of the work conducted by the CR Committee during the year are available in the CR Committee Report in the [HKEX 2024 Annual Report](#).



In 2024, an Executive Corporate Responsibility Committee (ECRC), co-chaired by the Chief Executive Officer and the Group Chief Sustainability Officer, was established to oversee the management of CR matters for the Group. The ECRC is a sub-committee of the HKEX Management Committee to provide active management of all CR matters, and reports to both the Management Committee and the CR Committee. The ECRC is responsible for developing, implementing and evaluating the CR strategy, policies and initiatives across the Group. The ECRC also advises on and reviews the determination of relevant metrics and key performance indicators for CR priorities, as well as the development of short- and long-term targets for implementing and achieving respective goals and complying with relevant laws and regulations.

The Group Chief Sustainability Officer is responsible for driving the development of the Group's sustainability strategy, reporting and communications, helping to support ESG integration into all aspects of the Group's operations, policies and culture. A Sustainability Division is established and responsible for implementing the sustainability strategy and coordinating across different business divisions, helping with day-to-day operations and communications, and promoting market and employee awareness of the Group's sustainability focuses and initiatives.

Taking into account our responsibilities to our markets, people, communities and stakeholders, our sustainability-related policies and statements provide principles and guidance on integrating sustainability considerations into our strategy and operations. Details of these policies and statements are available on the [HKEX Group website](#).

On the risk management front, the Risk Committee was delegated by the Board to oversee and review the development and effectiveness of the Group's risk management framework and systems with a view to identifying and managing risks faced by the Group. Details of the work conducted by the Risk Committee during the year are available in the Risk Committee Report in the [HKEX 2024 Annual Report](#). On the management level, the Executive Risk Committee is delegated by the Management Committee to oversee and manage the Group's risk management activities and report to the Risk Committee.

We offer remuneration incentives for employees based on our Corporate Scorecard, which covers performance assessing the Group's sustainability achievements, including but not limited to progress in our net-zero journey, enhancing diversity and upholding a risk and compliance culture. Further information is available in the Remuneration Committee Report in the [HKEX 2024 Annual Report](#).



We have established an internal control and audit mechanism which actively supports the Group in achieving its business objectives, safeguarding its assets and reputation, and raising its control culture awareness. Adopting a risk-based approach to developing the HKEX annual audit plan, our internal audit (IA) function acts as an independent body to evaluate and improve the effectiveness of our risk management, control processes and governance practices. At least annually, our IA function performed risk assessments to evaluate the key risks associated with the business and corporate functions of HKEX, covering areas relating to sustainability, business ethics and data privacy, which drive the development of the annual audit plan.

## Risk Management

The Group Risk Management Framework includes Board-approved Risk Appetite Statements as part of a risk taxonomy which identifies the broad range of risks relevant to HKEX. Sustainability and climate-related risk factors are part of this structure and categorised under different risk categories such as governance, conduct, compliance, human capital, strategic business, operational and cyber risks, with corresponding risk assessments and mitigation to ensure the risks are managed and governed effectively. Risk appetite reporting is performed up to the Board level. Details of risk processes are set out in the Risk Committee Report in the [HKEX 2024 Annual Report](#). Further information about our climate-related risk management is available in the Climate Resilience and Mitigation section of this Report.

## Strategy

As a regulator, an exchange operator and a corporate, we have a dual position in enabling the development of a sustainable financial ecosystem and delivering collective success for our business and stakeholders. As the ESG landscape evolves, we continue to review and refine our strategy while maintaining close alignment with stakeholder expectations, market opportunities and the regulatory environment. Building on our materiality assessment, our sustainability strategy steers our ambitions and efforts across four priorities: connecting capital for the sustainable finance transition, promoting climate resilience, elevating our people and community, and spreading sustainable practices through our operations.

## Stakeholder Engagement

We are dedicated to maintaining an ongoing conversation with our stakeholders and reporting our progress and plans to manage and address important issues. As such, we establish dialogues with various stakeholder groups to ensure that we continue to meet their expectations and that our approach to sustainability remains relevant and consistent across our strategy and operations. To enhance trust in HKEX and help us gauge stakeholder expectations, we have two-way and transparent engagement with stakeholders in several formal and informal ways, as illustrated in the following table.



Major stakeholder groups	Examples of engagement channels and frequencies
Shareholders/institutional and individual investors	<ul style="list-style-type: none"> <li>• Annual general meeting, notices, circulars and announcements</li> <li>• Regular corporate publications, including financial reports</li> <li>• Enquiries or feedback to the Board</li> <li>• Analyst workshop, non-deal roadshows, investor meetings and conferences</li> <li>• Investor group calls on HKEX's quarterly financial results</li> <li>• Analyst briefings on HKEX's interim and annual financial results</li> </ul>
Market regulators	<ul style="list-style-type: none"> <li>• Regular liaison meetings and ad hoc work meetings</li> <li>• Daily, monthly, and annual reporting</li> <li>• Attending to requests for documents on an ad hoc basis</li> </ul>
Government bodies	<ul style="list-style-type: none"> <li>• Regular communications regarding the Group's key initiatives and new developments</li> <li>• Responding to enquiries for various government meetings, including the HKSAR Legislative Council meetings</li> <li>• Other work meetings on a regular and ad hoc basis</li> </ul>
Listed/potential issuers and market intermediaries	<ul style="list-style-type: none"> <li>• Market consultations on proposed changes to the Listing Rules</li> <li>• Publication of guidance materials, including guidance letters, listing decisions and frequently asked questions whenever necessary</li> <li>• Regular publications including reports on the review of listed issuers' annual report disclosures, corporate governance disclosures and ESG disclosures, Listing Regulation and Enforcement Newsletters</li> <li>• Investigation into listing compliance via written enquiries</li> </ul>
Market participants, members and information vendors	<ul style="list-style-type: none"> <li>• Regular consultative panel meetings, briefings, seminars and discussions</li> <li>• Market consultations on new proposals</li> <li>• Market rehearsals, connectivity tests and practices sessions before the launch of new/enhancement services and post-release tests</li> <li>• Surveillance and monitoring on market participants</li> <li>• Circulars and communications regarding the Group's key initiatives and new developments</li> </ul>
Mainland and overseas exchanges	<ul style="list-style-type: none"> <li>• Regular meetings to discuss market developments and areas of collaboration</li> <li>• Delegations for courtesy and training purposes</li> <li>• Annual board meeting of the World Federation of Exchanges</li> <li>• Participation in annual market surveys and trading information updates</li> <li>• Regular dialogue with other exchanges</li> <li>• Participation in industry associations and initiatives, including the UN Sustainable Stock Exchanges Initiative and the World Federation of Exchanges</li> </ul>
Public and media	<ul style="list-style-type: none"> <li>• Regular media interviews, events and briefings on HKEX's financial results</li> <li>• News releases on major corporate and business updates</li> <li>• HKEX and LME websites and social media channels</li> </ul>
NGOs, industry associations, professional bodies, and market users	<ul style="list-style-type: none"> <li>• Market consultations on new proposals</li> <li>• Regular meetings and correspondence with market practitioners and related associations regarding listing/trading matters</li> <li>• Response to periodic assessments on HKEX's sustainability performance</li> </ul>
Employees	<ul style="list-style-type: none"> <li>• Regular all-staff communications</li> <li>• Chief Executive Officer presentations and divisional visits</li> <li>• Learning and development seminars and workshops</li> <li>• Employee engagement survey and pulse check</li> <li>• Regular divisional townhall and focus group meetings</li> <li>• Wellness sessions and social activities</li> </ul>
Suppliers and business partners	<ul style="list-style-type: none"> <li>• Tender notices for procurement of products and services</li> <li>• Policy governance and implementation as well as process monitoring</li> <li>• Supplier CSR Code of Conduct and CSR questionnaire</li> </ul>
Charities, social enterprises, and local communities	<ul style="list-style-type: none"> <li>• Regular dialogues with charities and social enterprises</li> <li>• Community outreach and volunteering activities</li> <li>• Briefing sessions and panel interviews for funding programmes</li> </ul>



## Materiality Assessment

Understanding how various ESG topics affect our business and our stakeholders helps us to identify sustainability-related risks and opportunities for our strategic and organisational planning. We conduct a materiality assessment annually to review and prioritise the importance of various ESG topics, helping us to lay the foundation of our strategy and management approaches to sustainability. In 2024, the process entailed four main steps:

- 1 Identify**  
 We identified the potential ESG topics that may have an impact on our business and stakeholders based on megatrends, global and local industry developments, regulations and policies, as well as stakeholders' feedback.
- 2 Prioritise**  
 We determined material topics based on the principle of double materiality wherein we assessed how different ESG risks and opportunities affect the company, and how our businesses impact our key stakeholders under these ESG exposures.
- 3 Contextualise**  
 Based on the prioritisation results, we contextualised risks, opportunities and impacts, reflecting our Purpose, values and roles and aligning them with our overall business objectives and priorities, and developed four thematic sustainability priorities, as set out on the next page.
- 4 Validate**  
 The result of this year's materiality assessment was endorsed by the ECRC in December 2024 and approved by the CR Committee in February 2025. As an ongoing exercise, we will continue to assess how different ESG topics may affect our operations and the decision-making of our stakeholders through a systematic review process.





In this Report, the Group's sustainability objectives, approaches, initiatives and achievements for 2024 are reported under the new priorities below, transitioning from our former pillars of Our Markets, Our People and Our Operations.

## Our Priorities

### Sustainable Finance

Capital markets play an important role in the global sustainability agenda – from enhancing ESG standards and transparency, to connecting capital with sustainability opportunities. As a market regulator and an exchange operator, we facilitate the sustainable finance ecosystem by driving new rules and standards, product development, education and advocacy.

### Climate Resilience and Mitigation

Climate change is a pressing global issue that requires our collective action. Alongside our efforts in driving sustainable finance, we strive to be an exemplar of contributing to the global net-zero economy. Underpinned by our 2040 net-zero goal, we are enhancing climate resilience and mitigation, by decarbonising our operations and engaging with our value-chain partners.

### People and Community

Investing in people and communities contributes to long-term societal stability. At HKEX, we recognise that our success is closely tied to that of our people and community. We are committed to uplifting both by investing in talent development and well-being, promoting diversity and inclusion, and giving back to the community.

### Responsible Business

Responsible business practices are fundamental to building trust and confidence. As a critical financial market infrastructure, our businesses and operations are the backbone of Hong Kong's financial system. We reinforce the highest standard of integrity and professionalism and promote sustainable business practices in our operations and beyond.





# Sustainable Finance









# Sustainable Finance

Driven by growing awareness of global challenges such as climate change, resource depletion and social inequality – the steady progression of sustainable finance has been significant worldwide. HKEX's multi-faceted role necessitates our proactive support for financial markets that contribute to sustainable economic development, climate action and social responsibility.

As a market regulator, we support our listed issuers on their sustainability journeys by providing clear standards, frameworks and guidance for ESG disclosure, application and implementation. To promote good corporate governance standards and ESG transparency, we continuously review and enhance our reporting framework to ensure that it remains fit for purpose and aligns with stakeholders' expectations and latest market developments. We also deliver educational programmes to increase awareness of sustainable finance among investors and companies.

As an exchange operator, we endeavour to connect capital with sustainability-related opportunities. From facilitating green and social product listings to developing voluntary carbon markets, we offer platforms and channels that provide transparency on green and social products and credentials, and that enable access to sustainable investment opportunities.

Financial literacy is a critical component of our strategy and we are committed to ensuring that our stakeholders are fully aware of the benefits and risks associated with financial products and market developments. We use our expertise and resources, leverage partnerships and advocate to empower others with the necessary information to make informed investment decisions.

## Enhancing Climate-related Disclosures: Alignment with International Standard

With climate change being a global concern, investors are demanding more information on how climate issues and related policy changes could impact an issuer's assets, business operations and financials. As a regulator of more than 2,600 listed companies, we play a vital role in ensuring that investors' information needs are met, while at the same time driving the sustainability agenda amongst our listed issuers through listing regulation, advocacy and education.

In 2023, the Exchange launched a public consultation seeking views on ways to enhance the climate-related disclosure requirements under our ESG reporting framework. The proposals included mandating climate-related disclosures in ESG reports and introducing new climate-related disclosure requirements based on the IFRS S2, which fully incorporates the TCFD recommendations.

In April 2024, the conclusions of the consultation were published wherein the proposed enhancement of climate-related reporting framework in alignment with the IFRS S2 went forward. In reaching its conclusions, the Exchange took into account the Government's vision and approach towards developing a comprehensive ecosystem for sustainability disclosure in Hong Kong and the IFRS Foundation's jurisdictional guide. We also introduced implementation reliefs including proportionality and scaling-in measures to address concerns over the reporting challenges that some issuers may face.

The amended Listing Rules came into effect on 1 January 2025, and a phased approach has been adopted. This shift in reporting expectations marks a significant milestone in our commitment to promoting consistent and comparable climate-related information in our markets, all of which would help to enhance the attractiveness and competitiveness of Hong Kong's capital markets. Details of the consultation conclusion can be found on the [HKEX Market website](#).

To better prepare listed companies for this transition, we published a new implementation guide and eLearning modules on our [ESG Academy](#) to assist issuers' understanding, interpretation and implementation of the new climate requirements.





## ESG Stewardship and Transparency

As a market regulator, we are committed to advocating and setting standards for ESG disclosure and governance in our markets. A component of that commitment is to continually enhance our ESG reporting framework so that it aligns with stakeholder expectations and international best practices.

As part of our ongoing work on driving the long-term attractiveness of our markets, we consistently elevate the quality of listed companies and promote high corporate governance standards. 31 December 2024 was the deadline for Hong Kong-listed companies to comply by having at least one different gendered director on their boards, demonstrating HKEX's ongoing effort in progressing its listed issuers' board diversity journeys. We are delighted to see almost all issuers complied by the deadline. To support issuers along the journey, we launched a multi-channelled GetOnBoard series with thought leadership articles, podcasts and interviews where inspiring leaders offered expert advice on avenues for nominating women to board positions. We also enhanced the [Board Diversity Hub](#), providing educational materials and expanding the board diversity statistics among Hong Kong's listed companies.

In 2024, we consulted on, and later resolved to implement, updates to our Corporate Governance Code, which would apply to corporate governance reports for financial years commencing on or after 1 July 2025, focusing on board effectiveness, board independence and diversity, and risk management and internal controls. Details of the consultation and its conclusion can be found on the [HKEX Market website](#).

To enhance awareness of the important role that corporate governance plays, we hosted an ESG Academy seminar where industry experts discussed the new elements of our updated Corporate Governance Code, provided the latest developments in boardroom practices and shared their experiences in improving board diversity and independence. The Exchange also launched the [INED Corner](#) to provide guidance on an INED's roles and responsibilities and how they can best perform their duties.

During the year, the Exchange published reports on the findings and recommendations of our annual review of issuers' [annual reports](#) and [ESG practices disclosures](#). We are delighted to observe high compliance rates with the Listing Rules. Throughout the year, the Exchange also published [Listing Regulations and Enforcement newsletters](#) and a [private reprimand summary](#) to promote corporate governance best practices.

In 2019, the LME announced its responsible sourcing requirements following a formal market-wide consultation. An important deadline for LME responsible sourcing was reached on 31 December 2023, with LME-listed brand producers required to submit ISO 14001 and ISO 45001 certificates (or their equivalent). At the same time, brand producers following Track A (implementation of OECD Guidance) were required to submit their audit reports or certifications from the standard-body to the LME. The required compliance information was sent by 90% of brand producers; the remaining brands and those that did not meet the requirements were either suspended or delisted. All suspended brands have the option to restore their status once the requirements are met, and we expect that many of them would do so soon. Throughout 2024, the LME continued to engage with standard setters, alignment assessors, and OECD to facilitate the alignment assessment process for Track A. An [update](#) for the broader market was published to showcase progress within the space.

## The LME and Carbon Emissions Reporting

In September 2020, the EU set a target to reduce GHG emissions by 55% by 2030, compared with 1990. To achieve this, the European Commission introduced the Fit for 55 legislative package in July 2021.

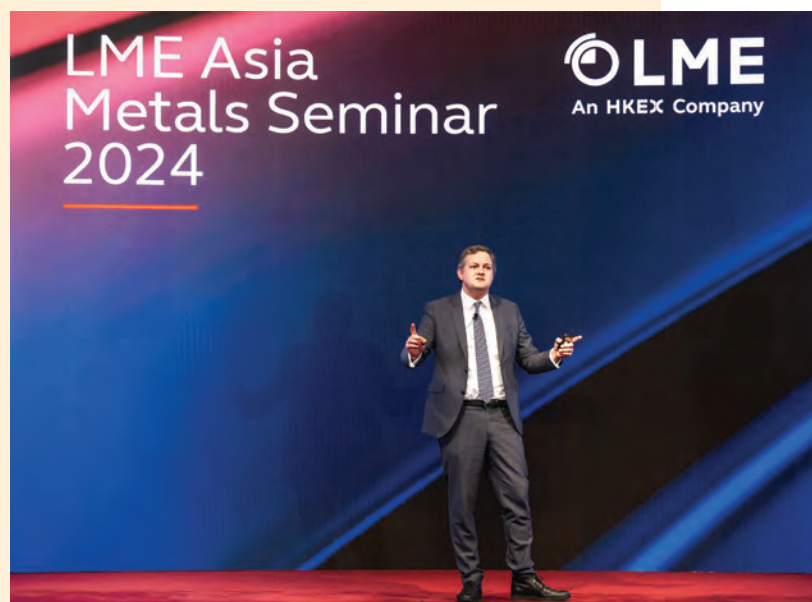
As part of these efforts, the EU launched the Carbon Border Adjustment Mechanism (CBAM), a policy aimed at addressing carbon leakage. CBAM imposes a carbon-related cost on certain imported goods, ensuring that imports bear similar carbon costs to those produced within the EU. This discourages the relocation of production to regions with less stringent environmental policies and incentivises foreign producers to reduce their carbon emissions. The mechanism currently applies to products in relation to aluminium, cement, iron and steel, fertilisers, hydrogen and electricity.

As aluminium is included in EU CBAM's scope, the policy directly impacts the LME's market. In 2024, the LME launched a consultation on incorporating CBAM-related requirements into LME rules to assist the aluminium market and its value chain. Following analysis of the feedback received, the LME announced its implementation measures to support compliance with EU CBAM. From June 2025, all LME-listed brands of primary aluminium, aluminium alloy and North American Special Aluminium Alloy Contract will be required to report Scope 1 and Scope 2 emissions data through LMEpassport, where the data will be linked to the Certificate of Analysis

for the relevant metal, ensuring that the data is easily accessible to metal owners. By facilitating the transfer of emissions data from producers who measure it, to importers who must report it – regardless of whether the metal has changed hands or there is no direct business relationship – the LME simplifies compliance with EU CBAM requirements.

In addition to mandatory EU CBAM-aligned reporting, the LME will encourage aluminium producers to voluntarily submit emissions data aligned with International Aluminium Institute methodology, allowing producers to present a comprehensive cradle-to-gate emissions profile.

The LME remains committed to supporting the development of the physical metals market. The LME has compiled a number of resources to assist with the transition to meeting these requirements, including a new [webpage](#) with additional guidance.





## Sustainable Finance Products and Services

As an exchange operator, we are uniquely positioned to connect capital with sustainability-related products and opportunities in the region. As part of our ongoing work on accelerating global progress towards decarbonisation and sustainable development, we continued to develop Hong Kong's international voluntary carbon trading market through Core Climate and enhance product transparency in sustainable finance through HKEX's Sustainable and Green Exchange (STAGE) and LMEpassport.

In 2024, we introduced Gold Standard's Verified Emission Reductions on our carbon marketplace Core Climate and partnered with Cathay Pacific Airways Limited to provide settlement services for its carbon credit purchases, underscoring our ongoing dedication to providing more options for market participants and supporting corporates on their climate transition journey. Core Climate is the only carbon marketplace that offers Hong Kong Dollar and Renminbi settlement for the trading of international voluntary carbon credits. The number of marketplace participants reached 100 in 2024, around a four-fold increase since Core Climate was launched in 2022.

Our sustainable finance offerings continue to grow, and we are committed to promoting and enhancing the transparency of information about these products. In 2024, 134 new ESG-related bonds were listed in our market, raising a total of \$291 billion.

As a central hub for data and information on sustainable and green finance products, STAGE continues to be our important platform enhancing the transparency of these products and facilitating the sustainable finance ecosystem of our region. As of the end of 2024, 156 bonds with an issuance amount of more than \$610 billion, 11 ETFs representing \$8.9 billion in market capitalisation, and ESG information of 770 equities were displayed on STAGE.

# \$1,280 billion

raised by ESG-related bonds listed on  
HKEX in 10 years (2015 – 2024)

In London, the LME continues to grow LMEpassport, a digital and centralised platform for LME-listed metal producers to disclose their sustainability credentials as well as sustainability-related targets and commitments, facilitating transparency in the commodities industry. In 2024, the LME continued to enhance its platform, introducing several new environmental-themed ratings, certifications and metal-specific carbon methodologies. As of the end of 2024, 265 brands disclosed their sustainability metrics with more than 690 sustainability disclosures on LMEpassport.

## Partnerships for Sustainable Finance

HKEX aims to position Hong Kong as a leading sustainable finance hub in Asia, attracting investments that support the transition to a more sustainable economy. But we cannot achieve this on our own. We collaborate with regulators, industry participants, and international organisations to progress the sustainability agenda and develop best practices.

Throughout the year, we continued our engagement with global and local industry bodies on policy and market developments:

- In 2024, we supported the launch event of the Glasgow Financial Alliance for Net Zero's (GFANZ) Hong Kong Chapter which provides local perspectives on GFANZ's work and enables knowledge sharing and capacity building with local and regional financial institutions in Asia Pacific. At the event, our CEO shared how HKEX advanced the global sustainability agenda through its role as a regulator, market operator and corporate.



- Throughout the year, we worked closely with partners of Net Zero Financial Services Providers Alliance (NZFSPA), delivering valuable insights and experience in driving the net-zero transition of capital markets. In 2023, NZFSPA published a [target setting framework guidance](#) on how stock exchanges can play a role in this journey through leading by example and exercising their market influence. We were proud to be one of only a few exchange operators to have achieved all the targets recommended by the guidance in 2024.
- The World Federation of Exchanges (WFE) is the global industry group for exchanges and clearing houses around the world, which represents over 250 market-infrastructures ranging from those that operate the largest financial centres to those that run frontier markets. As a WFE member, we exchanged ideas with other members to facilitate the sustainable development of global capital markets. In 2024, we supported the WFE's annual Ring the Bell for Gender Equality and Ring the Bell for Financial Literacy campaigns.
- We are an official supporter of the UN Sustainable Stock Exchanges Initiative (SSE), a UN Partnership Programme seeking to provide a global platform for exploring how exchanges, in collaboration with investors, companies, regulators, policymakers and other key stakeholders, can enhance performance on ESG issues and encourage sustainable investment, including the financing of the UN Sustainable Development Goals.



- In Hong Kong, in 2024, the Government published a statement setting out the vision and approach of the Government and financial regulators towards developing a comprehensive ecosystem for sustainability disclosure in Hong Kong. As part of the Hong Kong Green and Sustainable Finance Cross-Agency Steering Group (CASG), we supported the Government, financial regulators and local standard setter to develop a Hong Kong sustainability reporting standards (Hong Kong Standards) aligned with ISSB Standards. Climate-related disclosure enhancements in the Listing Rules serve as a first step to prepare listed companies for sustainability reporting in accordance with the Hong Kong Standards. As such, in September, we collaborated with the UN SSE and International Finance Corporation to host an online training to walk through the ISSB Standards and provide practical guidance on the preparation of sustainability disclosures. As a CASG member and the co-chair of its carbon market workstream, we promoted the local adoption of the ISSB Standards while taking steps to ensure the availability of the data, talent, capabilities and technologies needed for sustainable finance development in the region.

1,900+

participants in ESG Academy eLearning courses on the ISSB Standards

## Financial Literacy

We use our own expertise and resources to empower others with the necessary information to make informed investment decisions. We do this because we are committed to ensuring that our stakeholders are fully aware of the benefits and the risks associated with new products and market developments. The [HKEX Market website](#) serves as an effective platform to share educational and regulatory information with the public, such as financial products information, investor educational videos, thought leadership articles and reports, helping people to understand the foundations of securities and derivatives markets.

We regularly provide education on financial markets and products through conducting workshops, seminars and partnerships with industry associations. Throughout the year, we hosted industry events facilitating discussions on various financial products and developments. For example, we worked with the Hong Kong Securities Professional Association to deliver a course on the latest product developments, clearing settlements and market regulations for over 400 securities professionals. We also published an [ETF Spotlight](#) report, delving into the current landscape of fixed-income ETFs and strategies for investors to optimise their fixed-income ETF investments. We also hosted an HKEX Masterclass event to provide investors with a comprehensive analysis of the diverse options and structured products in Hong Kong, and explore trading and risk management opportunities amid the ever-changing economic and market conditions.



In 2024, we were delighted to show our support for World Investor Week – the International Organization of Securities Commissions’ annual global campaign to raise awareness about the importance of investor education. We again partnered with the Investor and Financial Education Council, the CFA Institute and the CFA Society Hong Kong to host our annual Strike the Gong for Financial Literacy event in October. Joined by industry experts, we hosted a discussion on expanding market connectivity and explored investment choices for retail investors, highlighting the importance of investor resilience to the unpredictable nature of financial markets.

On the commodities market front, the LME hosted its annual LME Week and metal seminars, gathering industry practitioners to discuss current trends and explore opportunities for the metals industry. A highlight was the fireside chat between LME CEO Matthew Chamberlain, and Teck CEO Jonathan Price, covering a number of sustainability topics including the future for sustainable metals, CBAM-related requirements and LMEpassport. Throughout the year, the LME offered online resources and bespoke training courses designed for companies and individuals with different needs, including LME’s sustainability initiatives. Details of these educational resources are available on the [LME website](#).









# Climate Resilience and Mitigation





# Climate Resilience and Mitigation

Climate change impacts every aspect of our lives, from the environment we live in to the way we run our business. We recognise the increasing frequency and severity of extreme weather events, rising sea levels, and shifting climate patterns – all of which pose substantial threats to ecosystems, human health, and economic stability. These changes can disrupt our operations, damage our infrastructure, and increase financial and operational risks.

The urgent need to address climate change also creates opportunities for innovation and access to new markets. By understanding and addressing the dual aspects of climate change, we seek ways of not only mitigating risks but also capitalising on opportunities that drive long-term success and resilience.

Our corporate commitment to achieving net zero remains core to our strategic efforts. Underpinned by our net-zero goal by 2040, we have developed near- and long-term targets which guide our climate strategy and efforts. These help us to reduce emissions progressively by continuously enhancing the efficiency of our infrastructure, using renewable electricity and exploring ways to decarbonise our operations. Notably, we reached our carbon neutrality goal in 2024 and submitted our science-based GHG emission reduction targets to the SBTi for validation.

Tackling climate change requires collective action and it is important for us to engage our employees and suppliers in our decarbonisation journey. By enhancing data transparency, raising awareness and fostering collaboration, we encourage their active participation to drive meaningful progress towards our sustainability goals.

## Climate-related Risks and Opportunities

Understanding the diverse actual and potential impacts of climate change on our business is crucial for our long-term sustainability. We have identified climate-related risks and opportunities, reviewed their impact on HKEX's business model and value chain, and assessed the potential financial and non-financial implications where applicable. Climate-related risks and opportunities that are likely to have an impact on HKEX are set out in the following tables.

Risks	Description and implications	Time horizon
Transition Risks		
Policy and legal risk	<p>From the perspective of a market regulator and exchange operator, we are actively involved in and affected by the latest developments in climate-related policies and regulations, such as the actual and potential introduction of policy measures by governments and regulators given their increasing focus on climate change. In March 2024, the Government published a statement setting out its vision to develop a comprehensive ecosystem for sustainability disclosures in Hong Kong that aligns with the ISSB Standards. In December, the Hong Kong Institute of Certified Public Accountants published a set of HKFRS Sustainability Disclosure Standards, which are fully aligned with ISSB Standards and will take effect in August 2025.</p> <p>The implementation of the EU CBAM, which addresses carbon leakage by applying a carbon-related cost to certain imported products, has impacted the LME and the wider metals and mining industry in several ways. The potential legal and regulatory changes introduced by these policy measures offer up both risks and opportunities to HKEX and its listed issuers, the LME and its members, and their underlying clients.</p> <p>From a listed company's perspective, we also acknowledge the increasing demands and requirements for climate-related disclosures and therefore their compliance and governance implications.</p>	Short to medium term
Market risk	Investor and client appetite for sustainable finance products, specifically for those which enable the low-carbon economy transition such as green bonds and carbon credits, has increased and continues to grow. This demand will lead to an increase in the range of sustainable finance products and services available on our markets and may reduce the attractiveness of those otherwise, e.g. certain metal products which are relatively energy intensive. As an exchange operator, failure to provide an effective, orderly and informed market for sustainable finance products may hinder our own overall market effectiveness, relevance and competitiveness.	Short to medium term
Reputational risk	HKEX considers it critical to our, and Hong Kong's, reputation to champion sustainable and green finance mechanisms and establish our markets as a regional hub for the low-carbon transition. Failure to engage listed issuers on quality ESG and climate-related disclosures could have a long lasting adverse reputational impact on our business. Similarly, with the broader metals and mining industry often being depicted and compared against other industries as not sustainable, the LME should continue engaging closely with market participants to understand if there is suitable market demand to explore wider sustainability matters. Otherwise, there is a risk that the industry will lose its social license to operate.	Short to medium term

Short term: current and up to 5 years

Medium term: 5 to 10 years

Long term: beyond 10 years



Risks	Description and implications	Time horizon
Physical Risks		
Acute risk	Most of the acute risks the Group is exposed to are tied to the potential impact of extreme events (e.g. typhoons, landslides, floods, storms) and the availability of climate-sensitive energy and water inputs. If acute physical risks materialise, some may pose risks to the Group's assets and the operational ability of the organisation would be affected, resulting in both reputational damage and direct loss of revenue. For the LME, these risks equally apply to its physical warehouse network. While the LME does not own or operate these warehouses, it does approve them for use in the storage of LME-listed metals, and as such they play a vital role in the operation of the LME.	Short to medium term
Chronic risk	Gradual changes in climate (e.g. changes in mean temperatures, water availability and rising sea-levels) have the potential to impact HKEX's and the LME's real estate and infrastructure, business continuity, people, and food systems. For example, rising mean temperatures would lead to higher demand for cooling in our data centres. Failure to meet such operating requirements would adversely impact the Group's services provision and increase our operating expenses.	Long term

While climate change imposes a range of physical and transitional risks to our strategy, operations and assets, there are also opportunities for our operations and our markets.

Opportunities	Description and implications	Time horizon
Access to new markets	<p>Against the backdrop of increasing investor demand for sustainable finance products and the recent progress made on international carbon market standards at COP29, HKEX considers the potential market appetite for green bond listings, carbon credits and other sustainable finance products in Hong Kong and Mainland China as a business opportunity. This potentially can have both direct revenue implications and broader reputational benefits.</p> <p>Similarly, the LME is aware of opportunities associated with electric vehicle production and renewable energy, which rely heavily on metals to meet these demands. In addition, leveraging LMEpassport, the LME also sees opportunities in providing the industry with greater transparency and access to accurate, comparable sustainability information relating to metals. We are committed to encouraging the acceleration of research and development of sustainable finance products and introducing them to our markets to enhance our overall market attractiveness, relevance and competitiveness.</p>	Short to medium term
Climate leadership	We are committed to pursuing net-zero emissions and leading by example in facilitating the low-carbon transition via our climate strategy, and we believe our actions would enhance HKEX's and the LME's profile as sustainability and climate champions.	Short to medium term

Short term: current and up to 5 years

Medium term: 5 to 10 years

Long term: beyond 10 years

## Climate Resilience

Based on the identified climate-related risks and opportunities that have the potential to influence our business strategy, operations and financial planning, we regularly assess the resilience of our strategy and business model to climate-related changes, developments, and uncertainties by analysing a diverse range of scenarios. A scenario analysis was conducted in 2021 to understand how identified risks and opportunities impact our strategy and operations mainly in Hong Kong, the Mainland and London. Several scenarios were considered based on the varying nature of future physical climate parameters and socio-economic conditions, such as policy ambitions, market behaviours, and energy and carbon prices that are relevant to our circumstances. Information on the scenarios used in our analysis is described in the following table. In 2025, we plan to refresh our climate resilience analysis with the latest scenario modelling methodologies and relevant physical and transitional conditions, helping to better inform our climate resilience and risk management.

	Referenced scenarios for physical risks	Referenced scenarios for transitional risks and opportunities
Time Horizon	2030 and 2050	
Sources of scenarios	Intergovernmental Panel on Climate Change (IPCC) Fifth Assessment Report	Network for Greening the Financial System (NGFS) Phase III
Scenarios chosen	RCP 8.5 – Business-as-Usual (4°C scenario)	Current Policies – Business-as-Usual (4°C scenario)
	RCP 4.5 – 2°C scenario	Divergent Net Zero – 1.5°C scenario in Disorderly Pathway
	RCP 2.6 – 1.5°C scenario	Net Zero 2050 – 1.5°C scenario in Orderly Pathway

## Enhancing the Climate Resilience of our Markets

In 2024, with the support of the Government, financial regulators, market participants and other key stakeholders, we enhanced our operational arrangements that allow Hong Kong’s securities and derivatives markets to remain open during severe weather conditions (SWT arrangement). Under the new model, the Hong Kong market will no longer experience delays or suspensions due to typhoons or rainstorms, allowing investors to better manage their risks and respond to changing market conditions. According to our analysis, our market operations would potentially be disrupted by the increasing frequency and severity of extreme weather events such as typhoons. While enhancing Hong Kong’s competitiveness as an international financial centre, the SWT arrangement also improves the climate resilience of our operations and markets. On 14 November 2024, the first SWT day was successfully implemented and all trading, settlements and clearing operations in HKEX’s securities and derivatives markets functioned normally, maintaining fair and orderly trading. More details of the SWT arrangement can be found on the [HKEX Market website](#).





## Risk Management

Climate-related risks and considerations have been integrated into the Group's Risk Management Framework for the identification, assessment, management and reporting of risks across multiple risk domains (including but not limited to governance, operational and strategic risks). The Group Risk Management Framework, approved by the Risk Committee, mandates a consistent and effective approach applied across the Group to manage the risks associated with our business and operations. This helps us with decisions relating to our operational footprint and the development of products and services, which in turn inform our financial planning and strategic decision-making for the medium- to long-term. Further details of the Group Risk Management Framework are set out in the Risk Committee Report in the [HKEX 2024 Annual Report](#).

## Strategy and Transition Plan

Based on identified climate-related risks and opportunities, and the assessed climate resilience of our business model, we have developed a multi-faceted strategy and transition plan to address climate change which involves driving the promotion and adoption of sustainability and climate-related best practices across four key areas:

- **Transparency and Education**

As a market regulator, we are committed to advocating and setting standards for climate-related disclosures in our markets. We achieve this by continually reviewing and enhancing our regulatory framework and by providing market education for issuers and the wider business community. Details of our efforts in this focus area in 2024 are disclosed in the ESG Stewardship and Transparency section of this Report.

- **Sustainable Finance Products**

As an exchange operator, we are uniquely positioned to connect capital with climate-related products and opportunities in the region. Details of our efforts in this focus area in 2024 are disclosed in the Sustainable Products and Services section of this Report.

- **Advocacy and Engagement**

Collaboration is key to accelerating the net-zero transition. We partner with international and local organisations to progress our collective sustainability journey through supporting climate-related policies, exchanging ideas and engaging with academic institutions, industry associations and NGOs for green finance education. Through HKEX Foundation, we also support charities and social enterprises to deliver environmental projects. Details of our efforts in this focus area are disclosed in the Partnerships for Sustainable Finance section of this Report and the [HKEX Foundation website](#).

- **Decarbonisation in our Operations**

As a corporate, we aim to lead by example and demonstrate responsible corporate practices that reflect our commitment to accelerating the global net-zero transition. We are committed to achieving net zero in our operations and working towards the targets pragmatically and responsibly through continual improvement in our operations and engagement with our business partners.

## Decarbonisation in our Operations

As part of our efforts to accelerate climate action and show our support for the Paris Agreement, we have committed to achieving net-zero emissions of our operations by 2040, covering Scope 1, 2 and 3 (where material) emissions.

We have also set near- and long-term carbon reduction targets against a 2023 base year and submitted these targets to the SBTi for validation. We will announce our approved targets in due course. In 2024, we are delighted to have achieved carbon neutrality, as per our goal.

Electricity consumption remains the major contributor to our carbon footprint. To effectively manage our overall energy efficiency, our TKO Data Centre has implemented environmental and energy management systems which are certified to the internationally recognised ISO 14001 and ISO 50001 standards respectively. It has also earned the two Leadership in Energy and Environmental Design (LEED) Gold Certifications from the US Green Building Council. Over the years, the TKO Data Centre has significantly improved its energy efficiency with a robust energy management plan, which prioritises efficient energy design and operations. In addition, it has installed solar panels that generate approximately 105,000 kWh of clean electricity every year. Other green features include holistic waste recycling facilities, rainwater harvesting system, and electric vehicles charging stations. In 2024, the TKO Data Centre was awarded the Platinum Rating under BEAM (Building Environmental Assessment Method) Plus Existing Building Version 2.0 by the Hong Kong Green Building Council.

To reduce our carbon emissions, we use electricity from renewable sources as much as practicable. This is achieved through either direct purchase of renewable electricity or the acquisition of renewable energy certificates from the markets in where our operations are located. As of the end of 2024, 99% of our operating premises were powered by electricity from renewable sources.

In 2024, we updated our carbon offsetting approach to offset unabated GHG emissions arising from our operations and supply chain (where material) by use of high-quality carbon credits generated from afforestation and revegetation projects in Mainland China – purchased via our voluntary carbon marketplace, Core Climate. In 2024, 54,839 tonnes of carbon credits were applied towards our carbon neutrality.



## Paperless Operations

Since the paperless listing regime was introduced in 2021, our ongoing paperless listing reforms have been widely welcomed by the market and successfully resulted in reduced use of paper and, recently, the first electronically registered prospectus in Hong Kong. In August 2024, we published a consultation paper on proposals to further expand the paperless listing regime. We are pleased to be introducing more digital and web-based options to our listing framework, such as through electronic money transfer as an alternative to cheque payments. Our proposals will not only align our practices with global standards but will also provide greater convenience and enhance efficiency for issuers, investors and other market participants. Details of the consultation and its conclusion can be found on the [HKEX Market website](#).

In addition, we are continuously modernising our depository vault inventory management through a series of digitalisation processes and operational enhancements. As part of the vault modernisation exercise, we used QR codes and barcode scanners to replace manual processes and converted paper-driven stock counts into digital formats, which significantly increased overall efficiency and accuracy and saved over 97,000 sheets of paper in 2024.

## Employee and Supply Chain Engagement

Tackling climate change requires collective action and we consider it essential to engage our suppliers in our decarbonisation journey. With value chain emissions accounting for a significant portion of the Group's total GHG footprint, engaging our suppliers and supporting them in setting their own carbon reduction targets has been instrumental to meeting our decarbonisation goals.

In 2024, we focused on improving transparency and accountability across our value chain by procuring low-carbon options, where possible. We also enhanced our supplier CSR questionnaire by adding new questions relating to their GHG emissions. According to the information collected during the year, the availability of GHG emissions data, and hence the readiness of our suppliers to set their carbon reduction targets, remained very limited. Going forward, we will continue to enhance our engagement with our suppliers to increase their awareness of and readiness for our overall decarbonisation goal.



## Promoting Sustainable Action

To raise awareness of environmental issues and encourage eco-friendly action, we hosted our annual HKEX Goes Green campaign in April. The campaign focused on promoting environmental stewardship both in the workplace and beyond through targeted activities and events.

- **Commit Green:** We launched the HKEX Goes Green Pledge with a list of everyday actions to encourage employees to embrace a greener lifestyle. More than 300 colleagues committed to integrating eco-conscious practices into their daily routines as part of the pledge.
- **Think Green:** A series of educational activities were hosted to inspire employees to innovate for positive change. We started with a visit to HK TimberBank, a social enterprise dedicated to recycling trees felled by typhoons or old age and transforming them into building materials, furniture and art installations. We also arranged a green facilities tour to our office building in Central where employees explored the advanced chiller plants and learned about the functionality of the food waste decomposers. To conclude the campaign, we organised an HKEX Explained webinar discussing the concept of net zero and sharing the Group's commitments, actions and performance, as well as showcasing how we are playing our part as a corporate in addressing climate change.
- **Act Green:** We established a partnership with The Loops Hong Kong to set up new recycling collection baskets at our offices. In support of this, we organised a Better World Series seminar for employees to learn more about how to adopt a zero-waste lifestyle. During the seminar, we had an insightful conversation with the speaker, debunking some of the many myths about recycling and exploring practical tips on how to identify recyclable plastics.
- **Work Green:** Throughout the campaign, practical tips were shared to create a sustainable and efficient workplace. Our employees were encouraged to reduce paper consumption with better use of digital tools and energy-saving settings to enhance energy efficiency.











# People and Community





## People and Community

We know the success of our business is interdependent on the success of our people and our community. Recognising our influence within the organisation and beyond, we are an inclusive company that prioritises growth, wellness and diversity, while advancing positive social impact among the broader community.

At HKEX, we recognise the importance of both professional development and personal well-being to our employees. We are dedicated to building a working environment where our talents can thrive in every career stage. We start by recruiting the best people and creating rich careers across HKEX with a fair and equitable experience. We also promote professional growth and cultivate a learning culture through our training programmes, mentorship options and career development opportunities, ensuring that employees have the resources they need throughout their careers with HKEX.

We offer a holistic range of employee wellness activities that support physical, mental and financial well-being. We also place great emphasis on diversity and actively promote an inclusive workplace and the wider community, recognising the value that different perspectives and backgrounds bring to driving innovation and performance.

Through our charitable donations and corporate volunteering, we are supporting positive and long-lasting change in the communities in which we are deeply rooted. We strive to lift up our people and the community and do our part to build a better future for the prosperity of all.

## Talent Development

As an employer, we are committed to supporting the growth and development of our team – helping everyone thrive today and well into the future.

We invest in employees and create a culture of continuous improvement by offering a variety of training and leadership development programmes. In 2024, we delivered over 48,200 training hours to our employees via in-person and online training. Through our AI-powered iLearn platform, we provide high-quality, bite-sized learning resources catering to our employees' interests and needs. The platform draws upon content from both internal and external sources, allowing employees to explore topics including sustainability, innovation and technology.

Our structured leadership development programmes remain as our flagship initiatives and lay out a foundation of professional excellence for our future leaders to shape the Group's success while ensuring a strong talent pipeline. They feature bespoke training designed to equip colleagues at different levels with the right skills, mindsets and behaviours to progress their careers. In 2024, we enhanced our leadership programmes in the areas of leadership, business strategy and innovation, and 53 employees from middle-to-senior level positions were nominated to enrol in three key leadership programmes. Upon completion, participants were better equipped to understand organisational strategy in an ever-evolving business world and acquire skills to drive organisational change, sharpen strategic focus and deliver impactful people management and business results.

Our 24-month Graduate Programme continues to provide an unrivalled opportunity for young people embarking on their careers in global financial markets. In 2024, over 90% of participants continued to work at HKEX upon programme completion. We also welcomed a new cohort of 25 graduates to our programme, which combines interactive learning, financial skills training and senior management exposure, with on-the-job experience. Under the guidance of our senior leaders, graduate associates took the lead in launching a new digital business card project which highlighted their innovative thinking while enhancing operational efficiency and promoting environmental sustainability. In London, the LME hired four apprenticeship students, offering rotations through various departments to facilitate a broad experience of the business.

We also continued the HKEX Explained series across the Group to shine a light on important organisational topics. For example, we delivered a session on the Group's strategy and Corporate Scorecard to more than 700 employees, showing how HKEX strategies were translated into the Corporate Scorecard and discussing ways of contributing to the Company's achievements. The LME conducted the LME Explained sessions on a number of different areas within the business including sustainability, the regulatory landscape and risk and compliance. Additionally, the LME Master series equipped employees with skills in data visualisation and stakeholder engagement during the year.

Measuring annual performance is important in supporting employees' professional development and our performance management system provides a framework for regular feedback. Employees are required to set individual performance objectives for the year and their progress is monitored during mid-year and year-end reviews. While we have mechanisms for ongoing feedback throughout the year, people managers apply a multi-dimensional review system for their direct reports who solicit feedback from their peers and other colleagues. Workshops are organised regularly to facilitate open and effective communication between people managers and employees when discussing work objectives and performance.





## Employee Wellness and Engagement

We are dedicated to building a workplace that prioritises our employees' wellness and engagement. We recognise that mental health is crucial for employees to reach their full potential and enhance productivity, ultimately contributing to the overall success and sustainability of the company.

Whilst our Employee Assistance Programme offers 24/7 counselling services for employees in need, we are more focused on fostering a positive working environment that values the mental well-being of our people. In Hong Kong, we organised regular meditation sessions and hosted a guided tour at the scenic Kadoorie Farm and Botanic Garden for employees to experience the healing power of nature. In London, the LME also hosted its Mental Health Awareness Week and set up a new Mental Health First Aid safe space in its office, promoting mindfulness.

# 40+

sessions organised during the Global Wellness Month engaging 600+ employees

In September, we ran our annual group-wide Global Wellness Month during which we broadened the campaign to further support holistic wellness, offering a range of activities and events that support mental well-being, financial wellness and community giving. On top of the flagship Wellness Challenge that puts our employees' physical strength and stamina to the test, we also introduced a Wellness Marketplace featuring a range of stalls and activities related to physical, mental and financial well-being. Throughout the Month, we promoted employee wellness with a range of sports fun night, tai chi, yoga and HIIT programmes. To show our care for the community, we organised a blood drive and supported our charity partners which focus on mental wellness outreach.

Throughout the year, we hosted CEO presentations and divisional townhalls, sharing the latest strategic direction and business and operational developments. At the LME, there were two Coffee Connect sessions with 20 employees each, allowing lively discussions and idea exchange between senior leaders and employees.

We are also committed to fostering an open culture where the voices of our colleagues are heard. In between the bi-annual People Survey, the 2024

HKEX Pulse Survey was launched as an important checkpoint to ensure we continue to turn the dial on the issues that matter most to our team and our business. We are delighted to record a 10% increase in Engagement Score compared to the 2023 People Survey, helping us to contribute to a positive organisational culture that fosters a shared sense of purpose.

## Engaging our People for Teamwork and Collaboration

At HKEX, we believe that when employees feel valued and involved, they are more likely to contribute innovative ideas and solutions, driving business growth and adaptability.

With our corporate values of diversity, collaboration and engagement in mind, we offer a variety of options and opportunities for everyone to get involved and contribute, tailored to individual abilities and preferences. Throughout 2024, HKEX found numerous ways to engage with our employees at over 100 wellness events, attracting more than 1,000 unique attendees. This included regular meditation and physical activities that catered to all fitness levels, from HIIT and yoga to team sports. Alongside these year-round fitness and sports classes, we also set up a new corporate dragon boat team, which was off to a great start at promoting collaboration and teamwork.

To complement our existing diversity-oriented HKEX Networks, we enhanced our approach to employee engagement with a new employee-led network on fitness and an interested group for music appreciation. In May, we hosted the HKEX Networks Fair to promote these networks, encouraging more employees to connect, learn and share their experiences and perspectives on a wide range of topics. At each and every event and activity, we were delighted to see among our employees the enthusiasm and shared values that unite us all.





## Diversity and Inclusion

At HKEX, we recognise that diverse teams drive innovation, enhance decision-making, and reflect the diverse markets we serve. We have experienced how diversity affects the continued success of our business, and our actions related to fostering an inclusive culture reflect our values of integrity, collaboration and engagement.

Our approach to diversity and inclusion is embedded in our culture and the way we work every day. We are committed to promoting equal opportunities in the workplace through formal policies, knowledge sharing and awareness building. Throughout 2024, we focused our efforts on promoting gender equality, recognising people of different backgrounds as well as supporting those with family responsibilities and the LGBTQ+ community.

### Gender Equality

In March, we rolled out our annual multi-channelled campaign in Hong Kong and London to commemorate International Women's Day – a global occasion to honour the achievements and contributions of women across various fields and industries. In support of the UN-backed Ring the Bell for Gender Equality campaign, we hosted a gong-striking ceremony joined by 250 business leaders to showcase the role of capital markets in advancing gender diversity. Internally, we hosted a cocktail celebration where senior management shared their insights and personal stories about how to create a more inclusive working environment for women. Later in the year, we hosted a wellness workshop to raise employees awareness of the economic and social implications of gender inequality as related to well-being, and offered practical tips for creating a workplace that is more inclusive and considerate for women's health.

In London, as a signatory of the HM Treasury Women in Finance Charter, the LME is on track towards its pledge of 40% female representation across senior leadership roles by 2025.

### People of Different Backgrounds

At HKEX, we recognise the diverse and valuable roles that we all play in our society and our work, and we honour the uniqueness of each individual, regardless of their abilities and cultural backgrounds. We embrace differences and similarities by raising employee awareness of people of different backgrounds across our team and society. In July, we organised an interactive session with the Hong Kong Guide Dogs Association, where participants learned about the impactful work of guide dogs in aiding the visually impaired and the therapeutic value of animal-assisted intervention.

In celebration of Black History Month, the LME hosted an event supporting the Show Racism the Red Card campaign which helps combat racism through education and community engagement. Throughout the year, the LME embraced cultural differences through festive celebrations for Chinese New Year, Diwali and Eid al-Fitr.



## Individuals with Family Responsibilities

While supporting our employees' career ambitions, we also support them as they balance work and family commitments by organising informative sessions and providing a forum for connection. In 2024, we hosted a seminar featuring insights and tips on various educational pathways for children. A panel of education experts spoke about differences between local and international school options, boarding schools, and different approaches to university admissions around the world.

We also organised a lunchtime workshop on elderly care, focusing on effective and compassionate strategies for communicating with the elderly. During the workshop, we invited an external speaker to explore ways of understanding the needs and preferences of the elderly and ensuring difficult conversations are met with a compassionate mindset and skillset.

Throughout the year, we hosted several events inviting employees and their family members to enjoy a great time together via fun, energetic activities such as the HKEX Family Fun Day and a summer drum circle event.

## LGBTQ+

We foster a culture of belonging, respect and empowerment by offering opportunities for colleagues to connect and share their experiences and perspectives. In June, we hosted a thought-provoking fireside chat about the importance of equality in our communities, where the panellists shared their personal stories about the campaign for marriage equality. Alongside our annual Pink Friday celebration, we participated in the largest LGBTQ+ celebration in Hong Kong to promote respect for diversity through live music, performances and carnival game booths in the community.

## Community and Social Impact

Just as we aim to create a supportive environment for our employees, we also seek to positively impact the communities in which we operate. We achieve this by engaging with local communities through volunteer programmes, social investment and charitable donations.

Throughout 2024, our dedicated team of HKEX volunteers contributed 1,970 hours of their time to various activities and events, reflecting our unwavering commitment to driving positive change. Their efforts have touched the lives of the elderly, people with physical disabilities, and underprivileged families. They have promoted financial education for children and youth and worked to keep our environment sustainable. To amplify our volunteering efforts, we established strategic partnerships with HandsOn Hong Kong and Time Auction, allowing our employees to access to more diverse volunteering activities.

We also hosted Better World Series seminars and tours inviting our charity partners to share their insights on creating a positive impact in the community. The Series brought employees together to discuss topics ranging from promoting biodiversity, adopting a zero-waste lifestyle to the transformative power the arts can have as a catalyst for social mobility. We also collected children's books for a local social enterprise, Rolling Books, for distribution to disadvantaged families to promote children's literacy.





In November, we supported a cross-sector event which aimed to enhance NGO governance capabilities and strengthen connections between charitable institutions, social enterprises, and corporations. At the event, we shared how the diverse backgrounds of board members from different sectors reinforce responsible NGO governance and foster better collaboration between businesses and community stakeholders.

In 2024, we were delighted to establish a new postgraduate scholarship programme in honour of our former Chairman Laura M Cha, recognising her distinguished career and considerable contribution to the development of capital markets in Hong Kong and beyond. The scholarship will be awarded to an individual or individuals looking to advance their postgraduate studies in finance.

HKEX Foundation continued to make a positive impact through its various programmes, progressing financial literacy, diversity and inclusion, poverty relief and environmental sustainability. In 2024, we initiated a review on our philanthropy strategy to advance our approach to philanthropy and community impact. The HKEX Charity Partnership Programme and Impact Funding Scheme remained our key funding channels for supporting charities and social enterprises for different good causes. Details of funded projects under these two funding channels are available on the [HKEX Group website](#).

Nurturing future talent and supporting Hong Kong's position as a leading finance centre have always been key priorities for HKEX. Through the HKEX University Scholarship Programme, we continued to support the next generation of Hong Kong leaders who demonstrates outstanding potential in business and finance.

**\$86 million**

of donation committed by  
HKEX Foundation in 2024

As part of the LME's commitment to promoting responsible supply chain management, it continued its funding partnership with The Impact Facility charity, supporting its multi-year projects that address child labour in African mining communities and embed responsible mining practices into the global value chain. The LME also awarded a scholarship to two students at the Camborne School of Mines, helping them to kickstart their careers in mining.

## HKEX Foundation's Vision: The Cornerstone of Hong Kong

Deeply rooted in where we operate, HKEX is committed to making Hong Kong a better community. Aiming to address current and emerging challenges that our society faces, HKEX Foundation leverages its resources, expertise and networks to strengthen community bonds, connecting like-minded groups and charities working towards solutions for social and environmental challenges.

Collaboration is essential in addressing community-oriented issues because it brings together diverse perspectives and resources, fostering innovative solutions. Throughout 2024, the Foundation continued its efforts by partnering with social enterprises and charities helping to tackle various social and environmental issues. These ranged from providing immediate relief, empowering individuals through education and training, to offering tangible and emotional support services to those in need. By addressing these diverse needs, the Foundation strives to create a positive and long-lasting impact on the community.

### Supporting the elderly and their caregivers

To tackle challenges arising from an ageing population, we worked with social enterprises and local charities to support elderly and their caregivers in their different stages of the ageing journey.

By partnering with Big Silver Community, we strengthened the financial literacy of the elderly and their caregivers through knowledge sharing on the latest healthcare services at workshops, public talks and exhibitions. To increase awareness of end-of-life

care options, we also supported The Hong Kong Chinese Christian Churches Union Kwong Yum Care Home to deliver human-centred care services. Furthermore, through public education and advocacy, we supported HOBBYHK to provide alternative end-of-life arrangement options and after-death support.

### Promoting social inclusion through sports

We partnered with the InspiringHK Sports Foundation to deliver a project encouraging students with skin conditions to engage in sports. Through bespoke sports classes and educational talks, the project sought to promote students' physical and mental health and encourage them to take part in sports activities as their peers do. Our community partner Hong Kong Special Needs Sports Institute launched a comprehensive sports programme that emphasises the athletic abilities of children and youth with special educational needs through bespoke programmes and inclusive sports assessments. Through these projects, we seek to eliminate bias and create a more inclusive community for all.







# Responsible Business









# Responsible Business

We believe that strong governance and responsible operational management lie at the heart of a resilient business. Therefore, we are committed to enhancing the resilience and reliability of our operating systems and we promote the highest standards of integrity and professionalism in everything we do. This commitment not only ensures compliance with laws and regulations in where the Group operates but also fosters stakeholders' confidence and trust in our markets and services.

We continuously invest in technology and infrastructure, ensuring a resilient operating model for a fair and orderly market. Complementing a robust governance framework, we embrace a culture of responsibility, transparency and accountability across our operations through our business ethics and risk management policies, training and tools.

While acting responsibly in our own operations, we also take a prudent approach to supply chain management and promote sustainable business practices across the broader community.

## Business Ethics

Our [Code of Conduct](#), together with other internal policies, outlines the ethical and behavioural standards we expect of our employees. In 2024, we reviewed and enhanced our company-wide policies and procedures to strengthen our approach to anti-bribery and anti-corruption, business continuity management, conflicts of interest management, prevention of financial crime and risk management.

In addition to policies and procedures guiding employee conduct, we reinforce a culture of integrity and professionalism through ongoing education and regular communications. We held annual mandatory refresher training for all employees on their understanding of company policies relating to:

- anti-bribery and anti-corruption,
- conflicts of interest,
- cybersecurity and data protection,
- information barrier,
- personal account dealing, and
- prevention of financial crime.

Throughout the year, we also organised classroom training on our Code of Conduct and other compliance topics to emphasise the importance of upholding public interest, our corporate values and responsibilities. Training was provided to all new joiners to ensure their awareness and compliance with legal and regulatory requirements, as well as company policies and procedures related to compliance, risk management, safety, security and ethical conduct.

Sitting at the heart of the financial market, it is important for us to regularly review our processes and policies ensuring that effective anti-fraud controls and response procedures are in place. In 2024, we launched a fraud risk awareness training to refresh our employees on how they should respond in case of a fraudulent event.

In London, the LME hosted its annual Risk and Compliance Month, providing in-depth educational materials on compliance and risk themes affecting the business. During the campaign, learning sessions were organised to enhance employees' understanding of the regulatory landscape in the metals industry and their day-to-day responsibilities for managing risks.

## Prevention of Financial Crimes

The Group Prevention of Financial Crime Policy outlines our approach to properly identifying and appropriately managing money laundering, terrorist financing and the proliferation financing risks. It sets out our roles and responsibilities, and control measures in different scenarios when dealing with market participants, members or persons who have applied to become market participants or members, or any person/entity which has a business relationship with the Group.

## Anti-competitive Behaviour

We comply with applicable anti-competition laws and regulations in where we operate. As HKEX and its exchanges and clearing houses are subject to Section 76 of the Hong Kong Securities and Futures Ordinance, any introduction of new fees and amendment to fees are subject to the approval of the Securities and Futures Commission of Hong Kong (SFC). In 2001, HKEX signed a regulatory MOU with SFC which requires that any fee proposal submitted to the SFC must be supported by a comparison of the fees charged by exchanges and clearing houses in other jurisdictions where appropriate. The MOU specifically states that the primary objective of the fee mechanism is to ensure that HKEX does not abuse a monopoly position by charging excess or predatory fees or by discriminating against a particular participant.

## Freedom of Association and Collective Bargaining

The Group has not identified any operations that constitute a risk to the right to exercise freedom of association or collective bargaining. Employees' freedom of speech and association are respected as long as they are exercised in accordance with all applicable laws and regulations.



## Cybersecurity and Data Protection

Practising good cybersecurity is vital to our business, and we understand the importance of managing the integrity and reliability of our system. As cyber threats are continually evolving and becoming ever more sophisticated, we combat this by constantly working to identify, manage and mitigate the physical, financial and reputational risks that they pose to our business.

Under the oversight of the HKEX Risk Committee, we implement a cybersecurity programme that considers potential cyber threats impacting the organisation to protect the confidentiality, integrity and availability of HKEX's systems and information. Our cybersecurity programme aligns with industry best practices and guidelines, such as the NIST Cyber Security Framework, System and Organization Controls (SOC 2) Standard and we maintain an ISO 27001 certification for the information security management system of our enterprise data centre. The cybersecurity programme is validated by independent and qualified cybersecurity experts.

Our risk management process helps to identify and monitor cyber issues, enabling compliance with our cybersecurity policy and applicable regulatory and statutory requirements.

To foster a culture of cybersecurity awareness, in 2024, we provided employees with cybersecurity education and awareness building activities such as regular phishing simulation exercises.

HKEX has a cyber incident response plan tailored for various attack scenarios, which is regularly tested through drills to ensure its effectiveness and relevance.

Our Group Privacy Policy and Privacy Notices set out the principles and requirements by which HKEX governs how personal data is securely and lawfully processed, the key roles and responsibilities overseeing and guiding these procedures, and the rights of data subjects under the applicable data protection laws and regulations.

During the year, we focused on reviewing and strengthening existing practices and protocols on the management of confidential data (including personal data), refreshing the internal cross-disciplinary relationship between privacy risk management and cybersecurity to reinforce incident readiness, and delivering training on topical subject-matter such as AI.

## Third-party Sustainability

At HKEX, we believe that maintaining a responsible and ethical supply chain is crucial for long-term business success, as it not only reduces our environmental impact but also enhances operational resilience and promotes sustainability throughout the business community.

In support of this, our Group Procurement Policy sets out the fundamental principles and best practices that we adhere to when acquiring goods and services to minimise risks and promote ESG considerations during the procurement process. Alongside the Procurement Policy, suppliers are required to comply with the HKEX Supplier CSR Code of Conduct, which mandates our expectations relating to our supplier's approach to business ethics, occupational health and safety, human rights, labour practices, and environmental protection.

While we responsibly manage the social and environmental impacts arising from our operations, there remain risks stemming from our suppliers and third-party vendors. In 2024, we updated our Group Third Party Risk Management Policy and guidance, helping us to identify and manage third-party risks. Under the policy, employees are required to analyse and understand the third-party risks and conduct ongoing due diligence responsibly. To monitor the effectiveness of the policy and ensure appropriate controls or remediation measures are in place, annual quality assurance is conducted on third-party engagements. During the year, training and workshops were organised to support employees' understanding of risk assessment and due diligence in areas including but not limited to:



- anti-bribery and anti-corruption,
- anti-money laundering,
- business continuity,
- conflicts of interest,
- cyber and physical security,
- data protection,
- environmental protection, and
- human rights.

Supported by a set of supply chain sustainability guidelines, we embrace environmental and social considerations in our procurement decision-making process. For example, in late 2024, we partnered with New Life Psychiatric Rehabilitation Association, a charitable organisation dedicated to advocating for mental health and promoting employment for people with different abilities, to run Cafe 388 – refuelling HKEX guests and employees with coffee and snacks. In line with our commitment to sustainability, Cafe 388 features tabletops made from up-cycled plastic bottles and counter-tops made from recycled coffee grounds.

## Occupational Health and Safety

We are committed to maintaining a high standard of occupational health and safety (OHS) and continually reviewing the effectiveness of our OHS management system and performance.

Our Integrated Management System Manual aligns with ISO 45001 OHS management standard, setting out procedures for identifying, managing and evaluating hazards and potential hazards in the workplace. At least annually, we conduct regular inspections to assess OHS risks to prevent work-related injuries and illnesses. Our Human Resources Manual also sets out employee's roles and responsibilities for maintaining a safe and healthy workplace and outlines procedures for reporting potential OHS risks and accidents.

We provide a safe working environment by featuring a health and safety resources hub, outlining the procedures for handling emergencies and delivering training on OHS risk assessment protocols. During 2024, we organised first-aid courses and ran evacuation drills to ensure our employees were familiar with procedures in the event of an emergency.



# Performance Summary

The data measurement techniques and calculation methods used for this Report are stated, where appropriate. Past data and information for certain indicators have been restated with effects and reasons reflected and explained, where appropriate. Unless otherwise stated, figures provided in this section are reported for the corresponding year(s) specified below or as of 31 December of the corresponding year(s).

## Environmental Stewardship

The Group's operations in relation to its office in New York are excluded from environmental data disclosures due to its relatively small environmental footprint. Unless otherwise specified, the Group's environmental data in relation to its office in Singapore have been covered from 2023 onwards.

In 2024, there were no confirmed non-compliance incidents or grievances in relation to environmental protection that would have a significant impact on the Group.

### Emissions <sup>1,2,3</sup>

Indicators	Unit	2024	2023 <sup>4</sup>
Total GHG emissions (Scope 1 and 2)	tonnes	65	15,467
GHG emissions (Scope 1 and 2) per floor area	tonnes/m <sup>2</sup>	0.00	0.25
GHG emissions (Scope 1 and 2) per employee	tonnes/employee	0.03	6.06
Total GHG emissions (Scope 1, 2 and 3)	tonnes	54,839	58,141
GHG emissions (Scope 1, 2 and 3) per floor area	tonnes/m <sup>2</sup>	0.89	0.93
GHG emissions (Scope 1, 2 and 3) per employee	tonnes/employee	21.24	22.78
Direct GHG emissions <sup>5</sup> (Scope 1)	tonnes	60	288
Fuel	tonnes	27	277
Refrigerants	tonnes	33	11
Indirect GHG emissions (Scope 2 – market-based)	tonnes	5	15,179
Purchased electricity	tonnes	5	15,179
Indirect GHG emissions (Scope 2 – location-based)	tonnes	24,239	22,893
Purchased electricity	tonnes	24,239	22,893
Indirect GHG emissions <sup>6</sup> (Scope 3)	tonnes	54,774	42,674
Category 1 – Purchased goods and services <sup>7</sup>	tonnes	27,474	25,878
Category 2 – Capital goods <sup>7</sup>	tonnes	14,044	5,206
Category 3 – Fuel- and energy-related activities <sup>8</sup>	tonnes	6,158	5,952
Category 4 – Upstream transportation and distribution <sup>7</sup>	tonnes	3	2
Category 5 – Waste generated in operations <sup>9</sup>	tonnes	97	133
Category 6 – Business travel <sup>10</sup>	tonnes	4,694	3,972
Category 7 – Employee commuting <sup>11</sup>	tonnes	1,341	1,395
Category 8 – Upstream leased assets <sup>12</sup>	tonnes	941	120
Category 15 – Investments <sup>13</sup>	tonnes	22	16
Carbon Offset <sup>14</sup>	tonnes	54,839	2,277

<sup>1</sup> Given that the Group operates essentially as an information technology-based enterprise, its major air emissions are primarily indirect GHG emissions.

<sup>2</sup> This table includes non-financial metrics that are subject to measurement uncertainties resulting from limitations inherent in the nature and the methodologies used for determining GHG accounting. The selection of different but acceptable measurement techniques, including estimation, can result in materially different measurements. The precision of different measurement and estimation techniques may also vary. Moreover, the GHG accounting landscape is rapidly evolving, and as more high-quality data becomes available, the Group's understanding of emissions impacts continues to improve. The Group will continue to monitor the development in this space and update its measurement and estimation techniques and methodologies in the future when necessary.

- 3 The Group's GHG inventory includes carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulphur hexafluoride. The Group is not aware of emissions of nitrogen trifluoride within its operational boundary. GHG emissions data is presented in carbon dioxide equivalent and was calculated based on the reporting requirements including but not limited to the "GHG Protocol Corporate Accounting and Reporting Standard" issued by the World Resources Institute and the World Business Council for Sustainable Development (GHG Protocol), the "Practical Guide on Carbon Audit and Management – Guide to Low Carbon Offices" issued by the Environmental Protection Department in Hong Kong, "Global GHG Accounting and Reporting Standard for the Financial Industry" published by the Partnership for Carbon Accounting Financials (PCAF), guidelines issued by the Ministry of Ecology and Environment of PRC, and the "Environmental Reporting Guidelines: Including mandatory greenhouse gas emissions reporting guidance" issued by the Department for Environment, Food & Rural Affairs (DEFRA) in the UK. The Group has adopted the "operational control" approach for defining its organisational boundary for the purpose of GHG accounting and reporting.
- 4 Data for 2023 has been restated with updated methodologies, using location-specific emission factors if applicable or those from recognised sources.
- 5 The breakdown of the Group's 2024 Scope 1 GHG emissions is as follows: carbon dioxide (26 tonnes CO<sub>2</sub>e), methane (0.01 tonnes CO<sub>2</sub>e), nitrous oxide (0.8 tonnes CO<sub>2</sub>e) and hydrofluorocarbons (33 tonnes CO<sub>2</sub>e). There was no emission of perfluorocarbons and sulphur hexafluoride in 2024.
- 6 Scope 3 categories were covered to the extent that are relevant to HKEX and that data is available. The disclosed nine categories of Scope 3 emissions that HKEX has determined are relevant to its corporate operations. This table excludes Scope 3 Categories 9 to 14 emissions as they are not relevant to the Group due to its business nature.
- 7 GHG Scope 3 Category 1, 2 and 4 emissions: The Group utilises a hybrid approach with emissions being estimated using spend multiplied by either an industry-average emission factor, such as those sourced from Comprehensive Environmental Data Archive (CEDA) or a supplier-specific emission factor if available.
- 8 GHG Scope 3 Category 3 emissions: It includes upstream emissions relating to purchased fuels and electricity where the consumption emissions are captured in Scope 1 and 2. Emissions are calculated by multiplying the quantity of fuel consumed and energy purchased under Scope 1 and 2 by respective emission factors in relation to well-to-tank (WTT), transmission and distribution (T&D) loss, WTT's T&D loss, and grid loss.
- 9 GHG Scope 3 Category 5 emissions: The Group uses waste-specific data multiplied by applicable emission factors such as those provided by DEFRA and US Environmental Protection Agency (EPA) and estimates emissions for those operating premises that do not have such data based on headcount and the estimated average landfill and recycling tonnes generated per work day.
- 10 GHG Scope 3 Category 6 emissions: It includes emissions relating to the Group's directors and employees traveling for business including commercial air and rail travel, car rentals, and hotel accommodation. According to the GHG Protocol, reporting of emissions related to hotel accommodation are optional and they were 31 tonnes and 32 tonnes for 2023 and 2024 respectively. Business travel emissions are calculated based on distance travelled for commercial air and rail travel; and spend data for car rentals. WTT and radiative forcing factors, where applicable, are included in the emissions calculations.
- 11 GHG Scope 3 Category 7 emissions: It includes emissions relating to employee commuting in Hong Kong and Mainland China and emissions relating to employee commuting and teleworking in London. According to the GHG Protocol, reporting of emissions related to teleworking are optional and they were 144 tonnes and 68 tonnes for 2023 and 2024 respectively. The Group uses the US National Transit Database's data on public transit systems to estimate employee commuting the mix of bus, heavy rail and light rail, etc for operations in London and the data from Travel Characteristics Survey Report by the Transport Department of Hong Kong for operations in Hong Kong and Mainland China. The EPA emission factor was applied for public transit and passenger car, while DEFRA was applied for their respective WTT emissions.
- 12 GHG Scope 3 Category 8 emissions: It includes emissions relating to leased facilities where the emissions are not included in Scope 1 or 2. In 2024, the Group has determined that co-located data centres do not fall within the Group's operational control. As a result, energy usage and thereby the GHG emissions related to these data centres are categorised within upstream leased assets.
- 13 GHG Scope 3 Category 15 emissions: It includes emissions relating to HKEX's joint ventures and minority stake investments. For joint ventures, emissions are calculated based on HKEX's ownership percentage. For minority stake investments, emissions are estimated using financial and emission data from comparable peers based on 2022, 2023 or 2024 data.
- 14 In 2024, the Group retired 54,839 tonnes CO<sub>2</sub>e of carbon credits from afforestation and revegetation projects in Mainland China, which were verified by Verra.

## Energy Consumption <sup>1</sup>

Indicators	Unit	2024	2023	2022
Total energy consumption	MWh	38,177	39,400	36,446
Energy consumption per floor area	MWh/m <sup>2</sup>	0.62	0.63	0.59
Energy consumption per employee	MWh/employee	14.79	15.44	15.31
Direct energy consumption	MWh	106	111	127
Unleaded petrol	MWh	16	23	29
Diesel	MWh	90	88	98
Indirect energy consumption	MWh	38,071	39,289	36,319
Purchased electricity	MWh	13	35,245	32,305
Purchased renewable electricity <sup>2</sup>	MWh	38,058	4,044	4,014
Expense on energy consumption <sup>3</sup>	\$m	55	58	45

1 Energy consumption data was based on the amount of purchased electricity and fuels consumed.

2 Includes Renewable Energy Certificates (RECs)

3 Includes air-conditioning costs, electricity tariffs, fuel costs (for vehicles and backup generators) and RECs. Air-conditioning costs incurred do not necessarily reflect the actual amount of electricity consumption for air-conditioning since they were charged at a rate proportional to the floor area of leased offices.



## Waste Management <sup>1</sup>

Indicators	Unit	2024	2023	2022
Total waste produced and disposed to landfill	tonnes	80	70	54
Waste produced and disposed to landfill per floor area	tonnes/m <sup>2</sup>	0.001	0.001	0.001
Waste produced and disposed to landfill per employee	tonnes/employee	0.03	0.03	0.02
Waste produced and disposed to landfill				
General office waste	tonnes	73	68	52
Food waste	tonnes	7	2	2
Waste produced and collected for recycling				
Food waste	tonnes	6	8	1
Mixed recyclables	tonnes	37	30	29
Mixed paper <sup>2</sup>	tonnes	49	50	66
Waste lead-acid batteries <sup>3</sup>	tonnes	–	4	–
Mixed metals	kg	755	896	494
Mixed plastics <sup>4</sup>	kg	855	402	460
Wood	kg	277	123	128
Glass	kg	1,307	64	115
Mixed electronics <sup>5</sup>	kg/pieces	1,128	476	66

1 The figures disclosed represent data for the Group's operations in Hong Kong and London only.

2 Includes but is not limited to confidential waste paper generated within the Group and paper documents submitted by external parties

3 Waste lead-acid batteries are classified as hazardous waste.

4 Data for plastics and polyfoam in 2022 and 2023 are categorised under data for mixed plastics in 2024.

5 Data for 2024 is reported in kg while data for 2022 and 2023 are reported in pieces.

## Paper Consumption <sup>1</sup>

Indicators	Unit	2024	2023	2022
Total paper consumption	tonnes	38	29	17
Office paper	tonnes	34	25	13
Paper for printing publications <sup>2</sup>	tonnes	4	4	4
FSC or PEFC-certified or recycled paper used <sup>3</sup>	%	100	100	100

1 The figures disclosed represent data for the Group's operations in Hong Kong, Mainland China and London.

2 Includes paper used for printing corporate financial statement.

3 All office paper used and paper used for printing the Group's publications are FSC or PEFC-certified or recycled paper.

## Employment

As of 31 December 2024, the Group had a total of 2,582 employees.

In 2024, there were no reported incidents of non-compliance or grievances in relation to human rights or labour practices (including but not limited to discrimination and harassment) standards and regulations that would have a material or significant impact on the Group.

Indicators	Unit	2024	2023	2022
Number of employees <sup>1</sup>	no.	2,582	2,552	2,380
By gender				
Female	no.	1,072	1,029	975
Male	no.	1,510	1,523	1,405
By age group				
Below 30	no.	400	427	422
30 to 50	no.	1,770	1,751	1,626
Over 50	no.	412	374	332
By region				
Hong Kong	no.	1,781	1,719	1,599
Mainland China	no.	360	397	399
UK	no.	427	422	373
Others <sup>2</sup>	no.	14	14	9
By employment contract and gender				
Permanent (female)	no.	1,021	977	914
Permanent (male)	no.	1,423	1,442	1,323
Temporary/fixed term (female)	no.	51	52	61
Temporary/fixed term (male)	no.	87	81	82
By employment contract and region				
Permanent (Hong Kong)	no.	1,662	1,600	1,474
Permanent (Mainland China)	no.	360	397	399
Permanent (UK)	no.	408	408	355
Permanent (others <sup>2</sup> )	no.	14	14	9
Temporary/fixed term (Hong Kong)	no.	119	119	125
Temporary/fixed term (Mainland China)	no.	-	-	-
Temporary/fixed term (UK)	no.	19	14	18
Temporary/fixed term (others <sup>2</sup> )	no.	-	-	-
By employment type and gender				
Full-time (female)	no.	1,061	1,019	967
Full-time (male)	no.	1,510	1,522	1,402
Part-time (female)	no.	11	10	8
Part-time (male)	no.	-	1	3

<sup>1</sup> The number of employees is expressed as headcount.

<sup>2</sup> The figures refer to employees stationed in Singapore and New York.



## Diversity

Indicators	Unit	2024		2023		2022	
Total employees by gender per employee category		Female	Male	Female	Male	Female	Male
Senior	%	40	60	38	62	39	61
Middle-level	%	40	60	40	60	41	59
Supervisory-level	%	43	57	42	58	40	60
General	%	43	57	41	59	43	57
STEM-related positions by gender <sup>1,2</sup>	%	25	75	N/A	N/A	N/A	N/A
Employees promoted by gender <sup>1</sup>	%	48	52	N/A	N/A	N/A	N/A
Total employees by age group per employee category		<30	30-50	>50	<30	30-50	>50
Senior	%	–	63	37	–	67	33
Middle-level	%	3	82	15	3	84	13
Supervisory-level	%	27	62	11	28	62	10
General	%	47	40	13	51	37	12

1 Relevant figures have been disclosed from 2024 onwards.

2 Positions include functions relating to business analyst, engineers, information technology security, technology audit, market data operation, people analytics and human resources information systems.

## New Hires and Turnover

Indicators	Unit	2024	2023	2022
Total new hires	no. (%)	343 (13)	414 (16)	452 (19)
By gender				
Female	no. (%)	140 (13)	150 (15)	173 (18)
Male	no. (%)	203 (13)	264 (17)	279 (20)
By age group				
Below 30	no. (%)	87 (22)	125 (29)	168 (40)
30 to 50	no. (%)	224 (13)	250 (14)	259 (16)
Over 50	no. (%)	32 (8)	39 (10)	25 (8)
By region				
Hong Kong	no. (%)	256 (14)	290 (17)	305 (19)
Mainland China	no. (%)	23 (6)	31 (8)	79 (20)
UK	no. (%)	64 (15)	86 (20)	65 (17)
Others <sup>1</sup>	no. (%)	–	7 (50)	3 (33)
Total employee turnover <sup>2</sup>	no. (%)	197 (8)	203 (8)	328 (14)
By gender				
Female	no. (%)	68 (6)	79 (8)	114 (12)
Male	no. (%)	129 (9)	124 (8)	214 (15)
By age group				
Below 30	no. (%)	35 (9)	50 (12)	89 (21)
30 to 50	no. (%)	124 (7)	133 (8)	208 (13)
Over 50	no. (%)	38 (9)	20 (5)	31 (9)
By region				
Hong Kong	no. (%)	143 (8)	137 (8)	195 (12)
Mainland China	no. (%)	17 (5)	29 (7)	60 (15)
UK	no. (%)	37 (9)	35 (8)	71 (19)
Others <sup>1</sup>	no. (%)	–	2 (14)	2 (22)
Average years of service	no.	7	7	6
Employees eligible to retire within the next five years	no.	154	141	130

1 The figures refer to employees stationed in Singapore and New York.

2 The figures refer to voluntary turnover of employees.

## Return to Work and Retention after Parental Leave

Indicators	Unit	2024	2023	2022
Employees who took parental leave <sup>1</sup>				
Female	no.	52	43	50
Male	no.	75	53	39
Employees who returned to work after parental leave ended <sup>2</sup>				
Female	no. (%)	43 (100)	36 (100)	30 (94)
Male	no. (%)	75 (100)	51 (100)	39 (100)
Employees who remained employed 12 months after the end of parental leave				
Female	no. (%)	32 (89)	24 (80)	27 (79)
Male	no. (%)	46 (90)	34 (87)	23 (88)

1 All employees are entitled to parental leave upon fulfilling certain criteria set out in the relevant policies.

2 Employees who were still on parental leave at the end of the corresponding year were excluded from the calculation.

## Gender Pay Gap

Indicators	Unit	2024		2023	
By region <sup>1,2</sup>		Mean	Median	Mean	Median
Hong Kong	%	5	5	8	8
Mainland China	%	-35	-37	-20	-20
UK	%	13	7	13	12

1 Relevant figures have been disclosed from 2023 onwards.

2 The figures refer to the difference between male and female pay level for their basic salary. For example, if the average male pay was \$100 per annum and the average female pay was \$75 per annum, there would be a gender pay gap of 25%.

Indicators	Unit	2024		2023		2022	
By region and pay quarter <sup>1</sup>		Female	Male	Female	Male	Female	Male
Hong Kong							
Top quarter	%	43	57	42	58	42	58
Upper middle quarter	%	44	56	43	57	44	56
Lower middle quarter	%	45	55	44	56	46	54
Lower quarter	%	53	47	53	47	55	45
Mainland China							
Top quarter	%	40	60	33	67	33	67
Upper middle quarter	%	30	70	29	71	30	70
Lower middle quarter	%	20	80	19	81	19	81
Lower quarter	%	21	79	22	78	18	82
UK							
Top quarter	%	29	71	26	74	27	73
Upper middle quarter	%	31	69	29	71	27	73
Lower middle quarter	%	32	68	30	70	32	68
Lower quarter	%	53	47	50	50	56	44

1 Employees were ranked based on their basic salary.



## Remuneration

Indicators	Unit	2024		2023		2022	
Basic salary <sup>1</sup> and remuneration <sup>2</sup> of female employees to male employees		Basic salary	Remuneration	Basic salary	Remuneration	Basic salary	Remuneration
Hong Kong							
Senior	ratio	1.0	1.1	1.0	0.9	1.0	1.0
Middle-level	ratio	1.0	1.0	1.0	1.0	1.0	1.0
Supervisory-level	ratio	1.0	1.0	1.0	1.0	1.0	1.0
General	ratio	1.1	1.1	1.1	1.1	1.1	1.1
Mainland China							
Senior	ratio	1.0	1.4	1.0	1.8	1.0	1.5
Middle-level	ratio	1.1	1.2	1.0	1.2	1.0	1.2
Supervisory-level	ratio	1.0	1.1	1.0	1.0	1.0	1.1
General	ratio	1.0	1.0	1.0	1.1	1.0	1.1
UK							
Senior	ratio	0.9	0.8	0.9	0.8	0.9	0.7
Middle-level	ratio	0.9	1.0	0.9	0.9	0.9	0.9
Supervisory-level	ratio	0.9	1.0	0.9	1.0	0.9	0.9
General	ratio	1.0	1.0	0.9	0.9	1.0	0.9

1 Basic salary is a fixed, minimum amount paid to an employee for his/her performance of duties.

2 Remuneration includes basic salary, performance bonus and share award, if any.

Indicators	Unit	2024	2023	2022
Annual total compensation <sup>1</sup> for the highest-paid individual to the median annual total compensation for all employees (excluding the highest-paid individual)				
Hong Kong	ratio	37	51	49

1 Annual total compensation includes the total sum of 12 months of basic salary as at year end, performance bonus and share award, if any.

## Learning and Development

Indicators	Unit	2024	2023	2022
Total cost of training	\$m	13.4	11.8	11.8
Total hours of training received by employees	no.	48,201	47,916	42,292
Average hours of training per employee and percentage of employees who received training	no. (%)	19 (99)	19 (98)	18 (87)
By gender				
Female	no. (%)	16 (99)	17 (99)	17 (78)
Male	no. (%)	20 (99)	20 (97)	20 (92)
By employee category				
Senior	no. (%)	14 (98)	19 (98)	11 (91)
Middle-level	no. (%)	18 (100)	21 (98)	19 (91)
Supervisory-level	no. (%)	21 (100)	17 (97)	20 (83)
General	no. (%)	18 (98)	16 (98)	12 (76)

## Occupational Health and Safety

In 2024, there were no confirmed non-compliance incidents or grievances in relation to occupational health and safety. No work-related fatalities occurred between 2022 and 2024.

Indicators	Unit	2024	2023	2022
Reportable injuries <sup>1,2</sup>	no.	2	–	–
Injury rate <sup>3</sup>	rate	0.08	–	–
Reportable occupational diseases	no.	–	–	–
Occupational disease rate <sup>4</sup>	rate	–	–	–
Lost days	no.	5	–	–
Lost day rate <sup>5</sup>	rate	0.19	–	–
Absentee days	no.	6,689	5,736	6,002
Absentee rate <sup>6</sup>	rate	1.04	0.9	1.02

- 1 Reportable injuries refer to work-related accidents to employees that resulted in incapacity for a period as defined in the relevant laws and/or regulations of respective jurisdictions where applicable. In 2024, one HKEX employee slipped on the HKEX premise, resulting in five lost days. In addition, one employee suffered an ankle injury during a business trip and no lost day occurred.
- 2 There were three incidents of HKEX's contractor workers suffering from physical injury when performing duties in the HKEX premise, resulting in a total of 44 lost days. Accident investigations were completed, and corrective and preventive measures have been put in place.
- 3 The injury rate is calculated based on the number of injuries per 200,000 hours worked (100 employees working 40 hours per week for 50 weeks).
- 4 The occupational disease rate is calculated based on the number of occupational diseases per 200,000 hours worked.
- 5 The lost day rate is calculated based on the number of lost days per 200,000 hours worked.
- 6 The absentee rate indicates the number of absentee days (as a result of occupational injuries and other illnesses) as a percentage of the total number of work days scheduled for the workforce.

## Supply Chain Sustainability

In 2024, the percentage of local key suppliers for the Group's operations in Hong Kong, Mainland China and the UK are 78%, 100% and 84% respectively. There was no significant change to the Group's supply chain in 2024.

During the year, the Group was not aware that any key suppliers had any significant actual or potential negative impact on business ethics, information security, environmental protection, human rights or labour practices, and no instances of non-compliance occurred in respect of these areas. There were no confirmed incidents where contracts with business partners were terminated or not renewed due to violations relating to corruption during the year.

Indicators	Unit	2024	2023	2022
Number of key suppliers <sup>1</sup>	no.	155	146	125
By region				
Asia (excluding Hong Kong and Mainland China)	no.	4	3	4
Australia	no.	1	1	1
Europe	no.	3	7	5
Hong Kong	no.	75	66	58
Mainland China	no.	7	6	3
UK	no.	55	55	50
US	no.	9	8	4
Others	no.	1	–	–
Total payment to key suppliers	\$bn	1.6	2.1	1.9

- 1 The definition of "key suppliers" refers to suppliers of products and/or services to the Group whose contract sum exceeded \$3 million, £270,000, RMB2.6 million or equivalent.

## Philanthropy and Volunteering

Indicators	Unit	2024	2023	2022
Charitable donations	\$m	87.5	95.0	141.6
Donation to The Community Chest of Hong Kong	\$m	25.0	25.0	50.0
Donations to other charity partners	\$m	62.5	70.0	91.6
Funds raised from the Stock Code for Charity Scheme	\$m	66.2	87.0	129.0
Employee volunteering hours <sup>1</sup>	no.	1,970	2,262	1,118
Employee volunteering leave days taken <sup>2</sup>	no.	92	74	33

<sup>1</sup> Includes volunteering hours from guests of HKEX employees

<sup>2</sup> Employees are given additional paid day leave (a maximum of one day for HKEX employees and a maximum of two days for the LME and LME Clear employees) in recognition of their efforts in serving the community.

## Business Integrity and Ethics

### Anti-corruption

In 2024, there were no concluded legal cases regarding corrupt practices brought against the Group or its employees. We are not aware of non-compliance incidents with relevant laws and regulations that have a significant impact on the Group relating to bribery, extortion, fraud and money laundering. During the year, 13 Directors, which account for 100% of the Board members, received training on anti-corruption.

### Conflicts of interest

In 2024, there were no confirmed incidents or substantiated complaints concerning conflicts of interest for the Group and its employees.

### Data Privacy

There were no confirmed incidents or substantiated complaints concerning breaches of customer privacy or losses of customer data that have a material impact on the Group between 2022 and 2024.

### Information Security

There were no material breaches or substantiated complaints concerning information security impacting the Group's operations between 2022 and 2024.

### System Stability and Reliability

During 2024, all HKEX's major trading, clearing, settlement and market data dissemination systems for the Cash, Derivatives, Commodities and OTC Markets continued to perform robustly.

### Anti-competitive Behaviour

In 2024, the Group was not aware of any legal actions against it for anti-competitive behaviour, anti-trust or monopoly practices.

### Product Responsibility

In 2024, the Group was not aware of any incidents of non-compliance with regulations and voluntary codes concerning the provision and use of the Group's products and services, which cover product and service information and labelling, marketing communications including advertising, promotion and sponsorship, and property rights including intellectual property rights that would have a significant impact on the Group.

Indicator	Unit	2024	2023	2022
Enquiries and complaints handled	no.	5,802	5,799	7,722



# About this Report

## Overview

This Report gives an annual update of the Group's sustainability performance for the 2024 calendar year. It is available on the HKEX Group website and should be read in conjunction with the [HKEX 2024 Annual Report](#), and the Corporate Governance Report contained therein, as well as the Corporate Governance and the Sustainability sections of the HKEX Group website.

## Boundary and Scope

Unless otherwise specified, this Report covers the operations of HKEX and its subsidiaries. There is no significant change in the boundary and scope of this Report from that of the HKEX 2023 CSR Report, published on 18 March 2024.

## Reporting Principles

This Report aims to provide a balanced representation of the Group's sustainability performance under our four thematic priorities. In particular, the selected content aims to reflect the impacts of the identified material and relevant sustainability topics on the Group as well as the Group's involvement in addressing these impacts.

The content of this Report was determined through a systematic materiality assessment process, which included identifying sustainability-related topics, assessing their materiality and relevance as well as topic boundaries, preparing and validating the information reported and reviewing and addressing stakeholder feedback on the Group's sustainability reporting. This Report covers key issues that are related to different stakeholders. Details of the materiality assessment and engagement channels with major stakeholders are disclosed in the Our Approach to Sustainability section.

To ensure a comprehensive understanding of the Group's sustainability performance over time, a summary of the Group's 2024 sustainability performance relative to various quantitative KPIs, with a comparison to 2022 and 2023, where available, is disclosed in the Performance Summary section. Information about the standards, methodologies, assumptions and/or calculation references, and sources of key conversion factors used for these KPIs are stated wherever appropriate. As far as reasonably practicable, consistent methodologies are adopted when calculating these KPIs or any changes that affect a meaningful comparison would be stated.

## Reporting Framework

This Report has complied with all mandatory disclosure requirements and "comply or explain" provisions outlined in the HKEX ESG Guide. This Report also references selected disclosures, or parts of their content, from the GRI Sustainability Reporting Standards and the IFRS S2 Climate-related Disclosures Standard. Content indexes are available on the [HKEX Group website](#) as a tool to help readers locate relevant information within the Report, HKEX's Annual Report and across HKEX's web-based resources.

## Forward-looking Statements

This Report contains forward-looking statements which are based on the current expectations, estimates, projections, beliefs and assumptions of HKEX about the businesses and the markets in which it and its subsidiaries operate. These forward-looking statements are not guarantees of future performance and are subject to market risks, uncertainties and factors beyond the control of the Group. Therefore, actual outcomes and returns may differ materially from the assumptions made and the statements contained in this Report.

## Assurance

To ensure the quality of the information reported, the reporting process is standardised and the data reporting structure is checked, the Hong Kong Quality Assurance Agency has independently verified this Report. The scope, basis and findings of the verification are set out in the Verification Statement contained in this Report.

## Endorsement and Approval

This Report was endorsed by the Management Committee and the Corporate Responsibility Committee and approved by the Board in February 2025.

## Contact and Feedback

Your feedback is valuable to our continuous improvement, and we welcome any comments and suggestions you may have on this Report or our sustainability reporting in general. Please share any comments or suggestions regarding the Group's sustainability performance to [sustainability@hkex.com.hk](mailto:sustainability@hkex.com.hk).

# Glossary

**AI** • Artificial intelligence

**Board** • HKEX's board of directors

**Chief Executive Officer or CEO** • HKEX's Chief Executive

**CG Code** • Appendix C1 to the Main Board Listing Rules

**CO<sub>2</sub>e** • Carbon dioxide equivalent

**COP29** • 29<sup>th</sup> Conference of the Parties to the UN Framework Convention on Climate Change

**CR** • Corporate Responsibility

**CSR** • Corporate Social Responsibility

**Director(s)** • HKEX's director(s)

**ESG** • Environmental, Social and Governance

**ESG Guide** • Appendix C2 to the Main Board Listing Rules

**ETF(s)** • Exchange Traded Fund(s)

**EU** • European Union

**Exchange or SEHK** • The Stock Exchange of Hong Kong Limited

**GHG** • Greenhouse gas

**Government** • HKSAR Government

**GRI** • Global Reporting Initiative

**Group** • HKEX and its subsidiaries

**HIIT** • High intensity interval training

**HKEX** • Hong Kong Exchanges and Clearing Limited

**HKEX Foundation or Foundation** • HKEX Foundation Limited

**HKFRS** • Hong Kong Financial Reporting Standards

**HKSAR** • Hong Kong Special Administrative Region

**IFRS S2** • IFRS S2 Climate-related Disclosures

**INED(s)** • Independent Non-executive Director(s)

**IPCC** • Intergovernmental Panel on Climate Change

**IPO(s)** • Initial Public Offering(s)

**ISO** • International Organization for Standardization

**ISSB Standards** • IFRS S1 General Requirements for Disclosure of Sustainability-related Financial Information and IFRS S2 Climate-related Disclosures published by the International Sustainability Standards Board of the IFRS Foundation

**KPI(s)** • Key performance indicator(s)

**LGBTQ+** • Lesbian, Gay, Bisexual, Transgender and Queer plus

**Listing Rules** • Main Board Listing Rules and GEM Listing Rules

**LME** • The London Metal Exchange

**LME Clear** • LME Clear Limited

**Main Board Listing Rules** • Rules Governing the Listing of Securities on The Stock Exchange of Hong Kong Limited

**MOU** • Memorandum of understanding

**MWh** • Megawatt hour

**NGO(s)** • Non-governmental organisation(s)

**NIST** • National Institute of Standards and Technology

**OECD** • Organisation for Economic Co-operation and Development

**OTC** • Over-the-counter

**PRC** • The People's Republic of China

**RCP** • Representative Concentration Pathway

**SBTi** • Science Based Targets initiative

**STEM** • Science, technology, engineering and mathematics

**TKO Data Centre** • HKEX's data centre at Tseung Kwan O, Hong Kong

**UK** • United Kingdom

**UN** • United Nations

**US** • United States of America

**\$** • Hong Kong dollar

**\$bn** • Hong Kong dollar in billion

**\$m** • Hong Kong dollar in million

**£** • Pound sterling

# Verification Statement



## Scope and Objective

Hong Kong Quality Assurance Agency (“HKQAA”) was commissioned by Hong Kong Exchanges and Clearing Limited (“HKEX”) to conduct an independent verification for its sustainability disclosures (the “Selected Disclosures”) stated in its Sustainability Report 2024 (“the Report”). The scope of HKQAA’s verification covers Selected Disclosures associated to HKEX’s sustainability performance for the period from 1<sup>st</sup> January 2024 to 31<sup>st</sup> December 2024, including but not limited to:

- Information in the ‘Our Approach to Sustainability’ section, covering HKEX’s sustainability governance, stakeholder engagement and the process of materiality assessment;
- Information in the ‘Sustainable Finance’, ‘Climate Resilience and Mitigation’, ‘People and Community’ and ‘Responsible Business’ sections; and
- All information and data in the ‘Performance Summary’ section.

The objective of this verification is to provide an independent opinion with a reasonable level of assurance on whether the Selected Disclosures comply the disclosures requirements of the Environmental, Social and Governance Reporting Guide (“ESG Guide”) set out in Appendix C2 of the Listing Rules of The Stock Exchange of Hong Kong Limited.

## Level of Assurance and Methodology

HKQAA’s verification procedure has been conducted with reference to the International Standard on Assurance Engagements 3000 (Revised), Assurance Engagements Other than Audits or Reviews of Historical Financial Information (“ISAE 3000”) issued by the International Auditing and Assurance Standards Board. The evidence gathering process was designed to obtain a reasonable level of assurance as set out in the ISAE 3000 by using a risk-based approach.

Our verification procedure included but not limited to sampling the sustainability information stated in the Report, e.g. claims and performance data for detail verification; verifying the raw data and supporting information of the selected samples of the sustainability information; interviewing responsible personnel; and checking the internal control mechanism.

## Roles and Responsibilities

HKEX is responsible for the organization’s information management system, the development and maintenance of records and reporting procedures in accordance with the system, including the calculation and determination of sustainability information and performance.

HKQAA is responsible for providing an independent verification opinion on the Selected Disclosures provided by HKEX for the reporting period. The verification was based on the verification scope, objectives and criteria as agreed between the HKEX and HKQAA.

## Independence

HKQAA did not involve in collecting and calculating data or compiling the reporting contents. Our verification activities were entirely independent and there was no relationship between HKQAA and HKEX that would affect the impartiality of the verification.



## Limitation and Exclusion

The following limitations and exclusions were applied to this verification due to the service scope, nature of verification criteria, and characteristics of the verification methodology.

- I. Our verification scope is limited to compiling the raw data or information for the Selected Disclosures, e.g., claims and performance data stated in the Report.
- II. The GHG quantification process is subject to inherent uncertainty, which arises from the incomplete scientific knowledge about the GHG measurement. Additionally, GHG accounting procedures are subject to estimation (or measurement) uncertainty resulting from measurement and calculation processes used to quantify emissions within the bounds of existing scientific knowledge.
- III. Evaluating the quality of execution and implementation effectiveness of the ESG practices, the appropriateness of the assumptions made, and the estimation techniques applied are outside the scope of our verification.
- IV. The verification of raw data or information is based on a sampling approach and reliance on the client's representation. As a result, errors or irregularities may occur and remain undetected.
- V. Any information outside the established verification period is excluded.

## Conclusion

Based on the evidence obtained and the results of the verification process, it is the opinion of the verification team, with a reasonable level of assurance, that:

- the Report has been prepared, in all material respects, in accordance with the ESG Guide set out in Appendix C2 of the Listing Rules of The Stock Exchange of Hong Kong Limited

**Signed on behalf of Hong Kong Quality Assurance Agency**



**KT Ting**

Chief Operating Officer  
February 2025  
Ref: 14948531-VER



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## **Hong Kong Exchanges and Clearing Limited**

8/F, Two Exchange Square,  
8 Connaught Place, Central, Hong Kong  
T (852) 2522 1122 F (852) 2295 3106  
[info@hkex.com.hk](mailto:info@hkex.com.hk)

[hkexgroup.com](http://hkexgroup.com) | [hkex.com.hk](http://hkex.com.hk)