

From:
Sent: Tuesday, April 03, 2012 1:25 PM
To: response
Subject: Comments on ESG Reporting Guide

Dear Sir/ Madam

I am recommending that the following additions be made to the ESG Reporting Guide:

1. Aspect A1: I recommend that the language underlined be added:

“Information on:

(a) the policies;
(b) compliance and material non-compliance with relevant standards, rules and regulations;
(c) processes to monitor and address; and
(d) highest level of management responsibility
on compensation and dismissal, recruitment and promotion, working hours, rest periods, equal opportunity and diversity, flexible work arrangements, maternity and paternity benefits and other benefits and welfare.”

2. KPI A1.1: I recommend that the language underlined be added: “Total workforce by employment type, age group and geographical region and gender”

3. KPI A1.2: I recommend that the language underlined be added: “Employee turnover rate by age group and geographical region and by gender”

4. KPI A3.1: I recommend that the language underlined be added: “Description of training activities provided and if relevant, the percentage of employees trained by employee category (e.g. senior management, middle management, etc.) and by gender”

5. For A1: I recommend that two new KPIs be added:

- a. “Information on Remuneration levels for male and female employees”
- b. “Information on executive and board composition, specifically: (1) % of women at Board Level and Senior Management/Executive Committee level and (2) Ethnicity and nationality of all board directors and (3) Age profile of board directors”

6. KPI A3.2: I recommend that the language underlined be added: “The average training hours completed per employee by employee category and by gender”

My rationale for the changes proposed above is that I believe that gender diversity is good for business performance and critical to Hong Kong’s competitive advantage. Hong Kong employers must access the widest possible talent pool. In addition, I believe that the current percentage of women on boards of the Hang Seng Index companies, as reported by the *Standard Chartered Bank Women on Boards: Hang Seng Index 2012*, at just 9%, is too low.

Yours sincerely,