

Environmental, Social and Governance Report

OVERVIEW

This report provides information on the Group's environmental, social and governance ("ESG") performance for the year of 2017. It should be read in conjunction with this annual report, in particular the Corporate Governance Report contained in this annual report, as well as the sections headed "Corporate Governance" and "Culture" on the Company Website.

SCOPE OF THIS REPORT

This report aims to provide a balanced representation of the Group's ESG performance in terms of environment, workplace, community, supply chain management and product responsibility. We will focus on each of these areas in turn in this report, in particular those economic, environmental and social issues that could have a material impact on the sustainability of our operations and that are of interest to stakeholders.

ESG STRATEGY, MANAGEMENT APPROACH, PRIORITIES AND OBJECTIVES

We believe that it is important to formulate effective strategies to balance the economic, environmental and social benefits of our activities with our other business targets. We have fully integrated ESG considerations into our operations as part of our corporate development strategy, with a particular focus on fostering closer connections with our stakeholders, listening to the voices of our users, working openly with partners to overcome challenges, caring for and growing with employees, and taking on more responsibility within society.

At the heart of our ESG strategy is our vision to become the most respected Internet company. In pursuit of this vision, we embrace the principle of sustainability, uphold integrity and promote shared growth and development within the industry; environmental protection, staff development and community welfare are always at the forefront. We conduct and review our ESG strategy in five dimensions as detailed below.

Five Dimensions of our ESG Strategy

1. Business operations
 - Operate in compliance with applicable laws and regulations
 - Operate with integrity and protect shareholders' interests
 - Care for employees and provide them with training and development opportunities
 - Establish a diverse corporate culture



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2. Users

- Consistently listen to the voices of our users, concurrently enhancing product and service quality
- Be honest to users and protect their interests
- Prioritise users' interests in business decision-making

3. Business partners (including suppliers and investee companies)

- Ensure our partners receive fair treatment and benefit from their collaboration with us
- Allow investee companies to maintain autonomy for their business development and meet them on a regular basis for exchange of industry knowledge and know-how
- Hold regular meetings with our partners to review their performance and explore possible collaboration opportunities
- Combat behaviours which are harmful to the interest of our partners by setting up an independent steering group on business ethics and anti-bribery practice

4. Community

- Establish a platform for charity donations
- Promote innovation and the establishment of a legal framework to protect IP rights
- Contribute to the industry and continue to provide an open platform

5. Environment

- Make protection of the environment one of our priorities
- Adopt a sustainable investment strategy
- Remain committed to environmental sustainability

Through this approach we are able to create a favourable environment that will enable us to provide quality services to Internet users and promote the positive development of wider society.

Stakeholder analysis

We understand the importance of the feedback from our stakeholders (including our users, investors, employees and business partners) on our ESG performance. Therefore, we have an effective communication channel with our stakeholders, which includes conducting an employee satisfaction survey annually and user experience research, engaging in constant discussion with our users directly before and after the launch of our products and services, and sharing our ESG strategies with our business partners.

Our ESG Direction

Our ESG strategy requires the participation of all of our product lines and platforms, and participation from across the wider Internet industry. We will continue to place more emphasis on ESG, and encourage every individual, enterprise and organisation to take part in the implementation of our ESG strategy.



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“Internet+” has significant implications for our ESG initiatives. Important changes can be achieved through connecting millions of Internet users as well as developing their modes of communication and living, and creating more exciting opportunities for society. In addition, through the “smart living” system in QQ and Weixin/WeChat, people and public services can be digitally connected, which in effect facilitate developments in transport, healthcare, environmental protection, public safety and other social arenas. This is important for optimising the distribution of societal resources, driving innovation in public services, improving service quality, breaking down communication barriers and ultimately benefiting the wider community. We will leverage our core capability in the Internet, technology and communication spheres to develop innovative approaches to resolving social issues, promoting social development and protecting the interests of the public. We also aim to drive ESG awareness in society, through collaborating with our stakeholders and other industry players.

Going forward, we will continue to enhance our corporate management system and integrate ESG considerations into our operations. We will closely cooperate with our stakeholders with the aim of creating a better future.

ENVIRONMENT

We recognise the importance of environmental protection and conservation of natural resources in our business operations. Starting from our office buildings in Shenzhen, we have implemented a number of energy-saving measures and we plan to adopt the same in our office spaces in other locations. We have also strived to build our data centres with environmental considerations as one of our key priorities.

Energy Saving Measures taken in our New Office Building

We have taken environmental protection as one of our priorities when designing our new office building, Tencent Binhai Building, in Shenzhen. The construction has been completed in accordance with LEED-EB standards. The property management company of the Shenzhen headquarters has obtained ISO 14001 (environmental management) certification, ISO 9001 (quality management) certification and GB/T 23331 (energy management system) certification. We have also implemented various measures to enhance efficiency of energy use and reduce water consumption and emissions.

We have optimised the air conditioning system and the integrated building management system in order to automate the energy saving and monitoring process. The air conditioning system uses pumps controlled by frequency-conversion technology for the enhancement of energy efficiency. We have also reduced energy consumption of the air conditioning system by partially deploying natural ventilation in autumn and winter.

Our new office building has adopted a centralised system to collect, purify and recycle rainwater and condensed water from the air conditioning system for the purposes of flushing, watering plants and cleaning the parking lot. In addition, we have installed a direct drinking water system in replacement of bottled water. It reduces the use of plastic packaging materials and indirectly reduces the CO₂ emissions generated from the delivery of bottled water.



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We monitor the levels of air pollutants such as PM2.5, PM10, carbon dioxide, carbon monoxide, sulfur dioxide, nitro dioxide inside and outside our office building with an online monitoring system and display the data on a real-time basis. To ensure the air quality in the building, we have installed induced ventilation system (which regulates the ventilation automatically in response to the level of carbon monoxide) in the underground parking garage and fresh air ventilation system (which regulates the ventilation automatically in response to the level of carbon dioxide) in the office area. We have upgraded the kitchen ventilation units in the kitchens in our office building. The units comprise fire-resistant environmental friendly exhaust hoods to remove oil and purify air with photolysis purification function and the activated carbon filter and air ioniser to neutralise odors. The emission of cooking fumes is in compliance with the PRC national standards GB18483-2001.

Energy Saving Measures taken in our Data Centres

We endeavour to fulfil our responsibility to protect the environment by applying innovative technology to our data centres and be the exemplar of green data centres in the PRC industry.

T-block technology (comprising (i) photovoltaic + High Voltage Direct Current (“HVDC”) technology for electrical design; (ii) indirect evaporative cooling units; (iii) smart control system; and (iv) fully commercialised project delivery solution) has been used in the fourth generation of our data centres, including the new data centre in Guangming, Shenzhen. Our PRC data centres are in the leading position in terms of power usage effectiveness in the PRC industry. According to a press release published by the Ministry of Industry and Information Technology of the PRC in April 2017, the power usage effectiveness of newly built big data centres in the PRC should be below 1.5 on average while that of our recently built Shenzhen data centre (which is located in a low-altitude climate zone) was below 1.25.

Our data centres are one of the first in the industry to use the combined cooling heating and power system and photovoltaic technology to generate clean energy. In addition, we are building an advanced data centre with a high level of privacy, defence and security in Gui'an in the PRC, which will serve as a highly reliable and environmentally friendly data centre for our Group and our eco-friendly business partners. In the Gui'an data centre, we will apply our self-developed T-block technology and leverage on the local climate and landscape to build a technologically advanced and energy efficient data centre with an innovative approach.

We have shared our experience and technology in building green data centres with other industry players so that HVDC, micro module and indirect evaporative cooling technologies have been widely adopted in the PRC data centre business. We have also helped to establish the industry standards for HVDC and micro module technologies in order to enhance energy saving efforts among the industry players.

Table of Environmental Key Performance Indicators

Below are the environmental key performance indicators of the Group. Unless otherwise specified, such data covers the Group's operation in China only; the data in relation to our office buildings excludes the data of Tencent Binhai Building which has only commenced partial operation since the last quarter of 2017 and the data in relation to our data centres only covers the main data centres which were built in the past three years.



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1. Emissions

Total GHG emissions (Scopes 1 and 2) (tonnes)	576,659.99
Direct GHG emissions (Scope 1) (tonnes)	2,783.79
Including: Gasoline (tonnes)	190.92
Diesel (tonnes)	463.05
Natural gas (tonnes)	2,129.82
Indirect GHG emissions (Scope 2) (tonnes)	573,876.20
Including: Electricity (tonnes)	573,876.20
Total GHG emissions in the office buildings per employee (tonnes per employee)	1.63
Total GHG emissions in the office buildings per floor area (tonnes per square metre)	0.09
Hazardous waste (tonnes)	2.21
Hazardous waste per employee (tonnes per employee)	0.00005
Non-hazardous waste (tonnes)	3,954.46
Non-hazardous waste per employee (tonnes per employee)	0.09

Note:

- 1 Due to its business nature, the significant air emissions of the Group are GHG emissions, arising mainly from electricity and fuels derived from fossil fuels.
- 2 The Group's GHG inventory includes carbon dioxide, methane and nitrous oxide. GHG emissions data is presented in carbon dioxide equivalent and is based on the "2015 Baseline Emission Factors for Regional Power Grids in China" issued by the National Development and Reform Commission of China, and the "2006 IPCC Guidelines for National Greenhouse Gas Inventories" issued by the Intergovernmental Panel on Climate Change (IPCC).
- 3 Diesel was consumed for backup generators.
- 4 Hazardous waste produced by the Group's operation mainly includes waste toner cartridge and waste ink cartridge from printing equipment at office buildings, as well as waste lead-acid accumulators at data centres. Waste toner cartridge and waste ink cartridge are collected and disposed of by printing suppliers, whereas lead-acid accumulators are disposed of by qualified waste recycling vendors. In 2017, there was no waste lead-acid accumulators.
- 5 Non-hazardous waste produced by the Group's operation mainly includes domestic waste and waste electronic devices. Domestic waste, including office waste and kitchen waste, is disposed of by the property management company and kitchen waste recycling vendors, and its data is not yet available for statistics, so we made estimation with reference to "Handbook on Domestic Discharge Efficiencies for Towns in the First Nationwide Census on Contaminant Discharge" published by the State Council. Waste electronic devices are recycled by waste recycling vendors.



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2. Energy and resources consumption

2.1 Office Buildings

Total energy consumption (MWh)	113,510.48
Direct energy consumption (MWh)	11,694.16
Including: Petrol (MWh)	779.92
Diesel (MWh)	22.04
Natural gas (MWh)	10,892.20
Indirect energy consumption (MWh)	101,816.32
Including: Electricity (MWh)	101,816.32
Total energy consumption per employee (MWh per employee)	2.67
Total energy consumption per floor area (MWh per square metre)	0.15
Running water consumption (tonnes)	612,700.27
Running water consumption per employee (tonnes per employee)	14.43
Recycled water consumption (tonnes)	5,261

2.2 Data Centres

Total energy consumption (MWh)	753,203.73
Direct energy consumption (MWh)	1,739.07
Including: Diesel (MWh)	1,739.07
Indirect energy consumption (MWh)	751,464.65
Including: Electricity (MWh)	751,464.65
Average PUE	1.28~1.50
Running water consumption (tonnes)	920,006

Note:

- 1 Total energy consumption is worked out by the data of electricity and fuel with reference to the coefficients in the “General Principles for Calculation of the Comprehensive Energy Consumption (GB/T 2589-2008)” published by the General Administration of Quality Supervision, Inspection and Quarantine of the People’s Republic of China, and the Standardization Administration of the People’s Republic of China.
- 2 The Group’s water resources come from municipal water supply.
- 3 Recycled water consumption is the recycled domestic water treated by the waste water treatment system equipped at Tencent Tower A in Chengdu Province.
- 4 Electricity fees in some data centres are borne by the operators so the relevant electricity consumption data is not available. The data on electricity purchased by our data centres reported here only covers the data centres whose electricity fees are borne by the Group.
- 5 Fees for diesel in some data centres are borne by the operators so such diesel data is not available. Data on diesel consumed by our data centres reported here only covers the data centres whose diesel fees are borne by the Group.



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- 6 Average PUE (Power Usage Effectiveness) is yearly average data of PUE of the Group's data centres. PUE, an indicator of the power efficiency of a data centre, is the ratio of total amount of energy used by a data centre to the energy delivered to the computing equipment.
- 7 Water fees in some data centres are borne by the operators so such running water consumption data is not available. Data on running water consumption in our data centres reported here only covers the data centres whose water fees are borne by the Group.
- 8 Data of packaging materials is not applicable to the Group.

WORKPLACE

Employee Development and Training

We have a well-established performance management system. A performance assessment for each employee is conducted by that employee's supervisor every six months and employees are required to work with their supervisors to set a performance target after each assessment. Supervisors are encouraged to provide constructive feedback from time to time to assist the personal growth of each employee.

As our staff is one of our most important assets, we invest heavily in employee development and training. We encourage employees to attend external and internal trainings. We have adopted relevant policies to ensure that employee trainings are provided and managed in a systematic manner. For example, supervisors are required to assist in designing the professional development plans for the employees and evaluate the effectiveness of the trainings received by the employees. To ensure the quality of the trainings, we have also developed policies which set out requirements for the qualifications and experience of the instructors and the objectives of the programmes and worked with external educational institutions from time to time to jointly develop training programmes.

In 2007, we founded our own corporate university, Tencent Academy. It offers different training programmes for each stage of an employee's career, including an induction, on-the-job training and leadership training. It has also set up an online learning platform and a mobile learning system in order to allow employees to learn anytime and anywhere. In 2016, we won the Innovation in Talent Development Award by the Association for Talent Development. We are the first Chinese enterprise which received such honour in that category.

As at 31 December 2017, there were approximately 600 face-to-face courses, 5,000 online courses and over 1,000 internal part-time instructors. Over the past decade, we ran face-to-face courses over 8,000 times per year and over 1,000 courses were livestreamed per year. The aggregate number of training hours of our employees in the past 10 years exceeds 5 million. Throughout 2017, the number of the average in-house training hours per employee was 39 and the percentage of employees who received training is 99%.

We also intend to open up our training resources to our business partners and industry players in order to enhance the market standard.



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Equal Opportunities and Diversity

We had 44,796 employees as at 31 December 2017. Our employment practice is in compliance with applicable laws and regulations (including but not limited to those which prohibit child and forced labour) and does not discriminate on the grounds of gender, ethnicity, race, disability, age, religious belief, sexual orientation or family status. Diversity is well supported in our corporate culture.

The recruitment process strictly abides by the guidelines of the Group's Human Resource Department. Every job applicant is required to provide information on his/her education background, qualification and job experience in a recruitment questionnaire, which is reviewed by Human Resource Department and verified by professional background check agency. This allows the Group to hire suitable candidate in accordance with the job requirements and, to the extent possible, avoid child and forced labour.

Compensation and Benefits

Compensation

We offer competitive pay and employee benefits to attract and retain talent. The remuneration and bonus system is performance-based and designed to reward employees with high performance and great potential.

Benefits

The basic benefits system was built and is maintained in accordance with relevant laws, regulations and market practice. In addition, certain special benefits are created to motivate employees and implement our strategy.

We were awarded by Universum as the most attractive employer in the Internet industry in 2015. We have also been voted as one of the best employers in the PRC for 12 consecutive years since 2006 in a survey jointly conducted by zhaopin.com and the Institute of Social Science Survey, Peking University.

We care for the well-being of our employees. For example, we celebrate special occasions of our employees (e.g. anniversary of joining us, wedding and festivities) by giving them different employee benefits. We strive to create work-life balance and a safe and comfortable work environment for employees. Employees have the flexibility to choose the most suitable insurance plans for themselves and their families.

Promotion

Employees may apply for promotion during their interim and year-end performance reviews, provided that they satisfy the requirements with regards to the length of service and performance. Depending on the practice area, the promotion will be reviewed and considered by different internal committees. The promotion review process is fair and open – there is a formal channel for our employees to provide and receive feedback. The promotion review is conducted in compliance with applicable laws and regulations.



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Employee Departure

All of our employees enter into written employment contracts which detail, among other things, the grounds for termination of the employment.

We value our relationship with our employees and handle employee departure (whether by resignation or dismissal) strictly in accordance with applicable laws and regulations. We arrange an exit interview with each of the departing employees to understand the reasons for his/her departure and welcome any suggestions for improvement.

Work-Life Balance

We have implemented various initiatives such as flexi-time arrangements and volunteer service leave to help employees strike a good work-life balance. The leave scheme allows employees to enjoy annual leave, fully-paid sick leave, half-paid leave of absence and fully-paid special Chinese New Year leave which are above the statutory standard. Also, female employees are entitled to take fully-paid maternity leave, while male employees are also entitled to take fully-paid paternity leave. Employees can also apply for one day of fully-paid volunteer service leave per year.

We also organise a wide variety of recreational and leisure activities (e.g. running, photography, music, dance, language classes) for employees.

Occupational Health and Safety

We strive to provide a safe and comfortable work environment for our employees. There are well-established security and fire service systems and food safety monitoring system.

We have a designated team in charge of the physical and mental health of employees. We arrange annual medical checkups for employees and organise health seminars, fitness sessions, on-site medical consultations as well as face-to-face and telephone counselling from time to time.

Our contribution to social insurance in the PRC is in compliance with applicable laws and regulations and we offer various supplemental insurance benefits to employees and their families (including medical insurance, critical illness insurance, accident insurance and life insurance).

Communication

We strive to create a casual yet sophisticated communication channel with customised content for our employees. There are annual rallies for employees and management, face-to-face discussion forums, featured magazines and social media platforms. The corporate strategy and culture are communicated and reinforced through these products and communication channels.



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COMMUNITY

Community Investment

We set up the Tencent Charity Foundation (the “Tencent Foundation”) on 26 June 2007. It is a non-public fundraising foundation incorporated in the PRC and a separate legal entity. We commit to donating certain portion of our profits to the Tencent Foundation every year for the purpose of supporting charitable works. As of 31 December 2017, our Group and our employees donated over RMB2.72 billion and RMB67 million in total to the Tencent Foundation respectively since its establishment. During the year 2017, our Group and our employees donated RMB820 million and RMB5.4 million to the Tencent Foundation respectively.

The Tencent Foundation believes that everyone can participate in charity work anytime and anywhere through technology. In June 2007, the Tencent Foundation leveraged on our Internet technical capabilities and online platforms to build the first online public fundraising platform. It is designed, developed and operated by the Tencent Foundation while we provide server, broadband and other technical support for free. The platform is open for eligible charitable organisations free of charge. It allows charitable works to be performed more conveniently, smoothly and transparently. This is a good example of the application of the concept of “Internet+”. As of 31 December 2017, there had been approximately 5,300 active charitable organisations and over 15,000 charity projects in different locations with different focuses.

The Tencent Foundation has also applied technology to various charitable initiatives such as WeCountry for rural development and Tencent Three-dimensional Disaster Relief Programme in response to recent natural disasters in China via the online platform. In 2017, the total number of donations made by the Internet users is approximately 63 million and the total amount of the funds raised is over RMB1.6 billion.

The highlight of the Tencent Foundation’s charity efforts is the annual “99 Charity Day” campaign where it matches the donations made by the Internet users between 7 September and 9 September via its online platform. In 2017, the Tencent Foundation donated RMB300 million for the campaign, of which 37% is for poverty relief, disaster relief and medical care, 31% is for education initiatives and the remaining 32% is for environmental protection initiatives and others.

In addition to promoting philanthropy through the online charity platform, the Tencent Foundation makes direct donation in the following areas: (i) disaster relief; (ii) rural development; (iii) education; (iv) ecological conservation and cultural preservation; (v) community development; and (vi) poverty relief.

Disaster relief

In response to the recent natural disasters in the PRC as well as globally, the Tencent Foundation has created a multifaceted disaster relief model by combining our various products including online platforms, instant messengers, online payment and Internet search to help the public follow the latest news, participate in rescue efforts and make donations. In addition, the Tencent Foundation has made donations to support the rescue missions and post-disaster reconstructions. In 2017, we donated an aggregate of approximately RMB5.9 million to the China Foundation for Poverty Alleviation, the One Foundation, Ai You Foundation and other charitable organisations in response to the earthquake in Xinjiang and the landslides in Sichuan and for the post-disaster child care programme following the earthquake in Ya’an city.



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Rural development

In 2015, WeCountry, our open platform built on the “Internet + Village” model, was launched to offer villagers access digital technology which will benefit their communities. As of 31 December 2017, 16 provincial administrative areas with approximately 5,800 villages (or communities) joined WeCountry platform. The number of verified villagers is over 2 million and they interacted with each other via the platform for over 160 million times as of 31 December 2017.

Education

The Tencent Foundation has set up scholarships to promote education in the PRC, Hong Kong and other countries throughout the years. There are also specific donations for different education initiatives. In 2017, the Tencent Foundation donated approximately RMB50 million in education related projects. For example, we set up a scholarship with each of China Children and Teenagers’ Fund, Li Po Chun United World College of Hong Kong and the Taxation Institute of Hong Kong. We sponsored activities of the Institute of Accountants Exchange and supported an education programme run by the China Children and Teenagers’ Fund.

Ecological conservation and cultural preservation

The Tencent Foundation is keen on environmental protection and cultural preservation. In 2017, the Tencent Foundation donated approximately RMB28 million to the China Foundation for Cultural Heritage Conservation and other ecological conservation organisations to continue to preserve and repair the Great Wall and for the ecological conservation project in China.

Community development

In 2017, the Tencent Foundation donated RMB7.6 million to China Association of Social Workers and other community organisations in support of the community organisations to promote philanthropy and innovation in charity work.

Poverty relief

In 2017, the Tencent Foundation donated approximately RMB140 million to support poverty relief initiatives through Ai You Foundation and other charitable organisations.



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Volunteering

In 2006, some of our employees founded the Tencent Volunteers' Association on their own initiative in response to our corporate vision of being "the most respected Internet company". Since then, the Tencent Volunteers' Association has contributed more than 100,000 hours of voluntary services. We launch more than 200 volunteering activities with more than 5,000 participants every year. In 2016, the Tencent Volunteers' Association was awarded a spot in the list of Top 10 Best Volunteer Organisations in Guangdong Province.

There are sub-divisions under the Tencent Volunteers' Association in Beijing, Shanghai, Chengdu, Shenzhen, Wuhan and Guangzhou formed by different business groups, each with a special focus on online charity, emergency support, poverty relief, scholarship, environmental protection, care for children with special needs, animal protection and green network. The Tencent Volunteers' Association works closely with the Tencent Foundation in various projects.

The Tencent Volunteers' Association combines its expertise in technology to help the community. For example, it has been broadcasting information on missing persons via Weixin/WeChat and QQ and with the latest facial recognition and blockchain technologies, the number of successful cases increased tenfold from approximately 40 in 2016 to approximately 400 in 2017.

In 2016, the Tencent Volunteers' Association also established the China IT-Philanthropy Union which promotes the "Internet + Charity" model by holding summits and publishing white papers on the successful examples of how the information technology has changed the landscape of charity work.

In order to encourage employees to participate in volunteer service, employees, since April 2012, have been granted one day of fully-paid volunteer service leave per year.

Anti-Corruption

Tencent embraces the value of integrity, proactivity, collaboration and innovation. To promote integrity, we have developed robust systems and measures to prevent, detect and deter corruption or any other fraudulent activities and internal audit is conducted to ensure the Group's compliance with ethical standards which we promote and strive to uphold.

Risk Management and Internal Control Policy

In 2016, we updated the Risk Management and Internal Control Policy (the "Policy") with a system comprising three lines of defence. The first line is business and functional departments. The risk management and internal control department serves as the second line while the internal audit department and anti-fraud team act as the third line of defence. The Policy sets out the roles and responsibilities of different stakeholders in risk management and controls (including those in relation to frauds). It is emphasized in the Policy that the management of each business group is primarily responsible for the risk management and internal controls of its department. If any fraudulent activity is detected, the management of the relevant department shall improve the control procedures promptly to prevent recurrence of similar incidents. The management may be subject to disciplinary actions if a fraudulent act occurs as a result of management's failure to implement any internal control measures. Each business group has its designated team to provide internal control and risk management support. We apply continuous auditing to key businesses in order to detect irregularities and identify risks in a timely and systematic manner and to improve the effectiveness of fraud risk management and control.



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Tencent Sunshine Code of Conduct

All employees of the entire Group are required to follow and to strictly comply with the Tencent Sunshine Code of Conduct (the “Sunshine Code”). It expressly prohibits all kinds of fraudulent activity, bribery, extortion and any other activities which are not in compliance with applicable laws and regulations. The Sunshine Code will be reviewed annually against the changing needs of the Group and revised when appropriate, in order to ensure that it reflects the positions under applicable laws and regulations and captures all kinds of fraudulent activities. To ensure our employees comply with the requirements and ethical standards stipulated in the Sunshine Code, all employees are required to complete e-learning programmes and attend various face-to-face training programmes with a view to understanding and refreshing the rules and standards of the Sunshine Code on a regular basis. For positions with high bribery risk, those employees are required to attend face-to-face training course at least once a year.

Anti-fraud and Whistleblowing Policy

We have adopted an Anti-fraud and Whistleblowing Policy (the “Whistleblowing Policy”), which clearly conveys the message of zero tolerance in relation to fraudulent activity to all the employees and suppliers/business partners. All employees and suppliers/business partners are encouraged to report genuine concerns about any potential fraudulent activities. The Whistleblowing Policy outlines the multiple whistleblowing channels and how the Group should deal with such concerns, so that employees and suppliers/business partners can report their good faith concerns without fear of reprisal or potential retaliation.

Fraud detection and corruption prevention

When a report of suspected fraudulent activities is received, the anti-fraud investigation team, which consists of professionals with profound knowledge in fraud risk management and solid fraud investigation experiences, is assigned to handle the investigation independently. After an investigation has been completed, the employee found and proven to have committed such fraud shall be subject to immediate dismissal, and corrective actions shall be taken in response to the findings at the same time. If we find any supplier or business partner engaging in corruption or any other fraudulent activities, we will put any supplier or business partner on the blacklist and terminate the contracts with them immediately. In the event that any fraudulent activity violates any relevant laws or regulations, such cases shall be reported to government authorities. In order to convey a message regarding our determination to fight against fraud and to introduce our whistleblowing system externally, we send a letter to our suppliers and business partners (including the current ones and the ones who ceased to work with us in the past two years) and request them to complete a questionnaire annually.



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Anti-Money Laundering

The Group strictly abides by all applicable laws and regulations on anti-money laundering and counter-terrorist financing, and fulfills its social responsibilities and legal obligations on anti-money laundering.

In 2017, we established an Anti-Money Laundering Committee (the “AML Committee”) chaired by our executive director and President, Mr. Lau Chi Ping Martin, with heads of each relevant business group as committee members. The AML Committee supervises and monitors the implementation of the anti-money laundering and counter-terrorist financing measures at the group level and at the subsidiary level with a unified approach. The objective is to centralise the management of the anti-money laundering efforts within the Group.

We continued to improve our anti-money laundering and counter-terrorist financing systems in various aspects such as infrastructure, know-your-customer process, procedures for identification and reporting of suspicious transactions and training. We have robust systems and measures to detect, deter and protect our business from involvement in financial crimes such as money laundering and terrorist financing.

Our protective measures include, but are not limited to, the following:

Three lines of defence

The Group has implemented a three-line defence mechanism. Our first line of defence is the product team and the business development team, which are responsible for enhancing the awareness of anti-money laundering requirements and implementing anti-money laundering measures. The risk management team and anti-money laundering team serve as the second line and they are responsible for organising and coordinating the anti-money laundering efforts within the Group including but not limited to conducting assessments on the anti-money laundering governance and compliance, supervising the construction of the anti-money laundering compliance framework and organising trainings and public relations events relating to anti-money laundering. The internal audit team acts as the third line of defence and its main responsibilities include conducting the annual anti-money laundering audit and independent assessment on anti-money laundering governance.

Anti-money laundering and internal control systems

We have: (i) formulated a set of anti-money laundering policies based on the applicable anti-money laundering laws and regulations; (ii) implemented an anti-money laundering monitoring system; and (iii) set up a dedicated anti-money laundering team, which is solely responsible for compliance management, anti-money laundering name screening and suspicious transaction monitoring.



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Other control measures

We have further improved the anti-money laundering compliance and internal risk control mechanisms by: (i) recruiting more anti-money laundering professionals for suspicious transaction review and analysis in order to enhance the effectiveness and specialisation level of anti-money laundering; (ii) strengthening the requirements for the know-your-customer procedures; (iii) enhancing the overall monitoring system of suspicious transaction and manual analysis; (iv) cooperating with regulators and law enforcement bodies on anti-money laundering investigation; (v) actively participating in the strike on terrorism and corruption internationally, in order to prevent money laundering and upstream criminal activities; and (vi) carrying out various forms of training, education and public relation activities on anti-money laundering.

SUPPLY CHAIN MANAGEMENT

Our supply chain management programme attaches supreme importance to managing the ethics risk associated with the relationship between our procurement employees and our business partners. It also focuses on teaching those employees who are involved in procurement to recognise and mitigate the inherent risks.

To enhance the social responsibility awareness of our employees, we have formulated a code of conduct which those employees engaging in procurement activities must adhere to. To minimise the ethics risks, such employees are also required to declare any relationship they may have with our suppliers in writing.

In the course of supplier engagement, potential suppliers are required to conduct self-assessment on their commitment, amongst other things, to environmental protection, social responsibility, and health and safety at work (the “Self-Assessment”).

Suppliers which are formally engaged by us are also required to agree to the terms of a declaration and undertaking in relation to anti-commercial bribery in doing business with our Group (the “Anti-commercial Bribery Declaration”).

During the year ended 31 December 2017, all suppliers which were formally engaged had completed the Self-Assessment and signed the Anti-commercial Bribery Declaration. We are not aware of any of our suppliers engaging in commercial bribery, or being materially and adversely affected by issues relating to environmental and social responsibility.

The procurement department looks for qualified suppliers in the market and conducts standard or simplified verification on the suppliers depending on the duration of the cooperation, the order volume and the nature of the request. We have maintained a database of qualified suppliers which are ready to take orders from us.

We have an internal policy which sets out the procedures for supplier onboarding. Before engaging a supplier, we will form a supplier assessment team to conduct the background check (including site visit) on the supplier. The team will consist of members from the procurement department, the requesting department, the technology department (if applicable) and the risk management department. The assessment results will be reported to the procurement department for a final determination.

We normally ask for price quotations from at least three vendors. Other factors including delivery time and technical capabilities of the vendors will be taken into consideration when selecting vendors. If there is only one vendor available for selection as it dominates the relevant market or it is the only vendor with access to the required goods/services, the exclusive procurement arrangement with such vendor will require special approval with a satisfactory justification provided by the technology department or the requesting department.



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We evaluate the performance of our suppliers from time to time and take appropriate steps to address any issues with the quality of the suppliers as part of our supply chain management. For suppliers with unsatisfactory performance, subject to the applicable contractual arrangements, we may (i) discuss with them on the remedial steps to be taken by them; (ii) suspend the cooperation; (iii) reduce the order volume; (iv) impose penalties; or (v) suspend payment. The procurement department may disqualify a supplier for the following events: (i) we suffer from material economic losses as a result of the delayed delivery, quality issue or breach of contract by the supplier; (ii) the supplier has received the lowest rating in the rating scale for two consecutive quarters; and (iii) the supplier has in serious breach of business ethics.

PRODUCT RESPONSIBILITY

We strive to provide the best user experience and pay high attention to the quality of our products and services. We conduct strict reviews of our product and service offerings and related sales, marketing and advertising strategies and materials to ensure their compliance with applicable laws and regulations. We also build in safeguards on user privacy, product safety and IP rights as described below.

User Privacy

To uphold our dedication to value creation for our users, amongst other user specific aims, one of our important missions is to protect the privacy of user data and other sensitive information. We comply with all the applicable laws on privacy protection, and incorporate applicable legal and regulatory requirements on privacy protection into our internal compliance policies taking into account the specific features of our products and services.

We have a dedicated privacy team within the Legal Department which is responsible for handling data protection matters. We have devised specific procedures to collect and process user data to ensure that we provide our products and services in accordance with applicable legal requirements. We evaluate specific products from the perspective of privacy protection on a regular basis and perform privacy risk assessments before the launch of new products to ensure that our products are not exposed to the risk of privacy infringement or leakage of user data.

We provide training to our employees to enhance their privacy protection awareness and build up the cultural awareness of the importance of privacy protection.

To ensure that our users understand how we protect their personal information and enhance the transparency of how we collect and process the data, we publish our privacy protection policies on our product websites and in-app products. We also provide communication channels for our users to file complaints and raise enquiries whenever they are in doubt.

We actively participate in shaping the development of the industry framework on privacy protection. For example, we have been accredited with privacy certifications from TrustArc for WeChat, which is the leading global data privacy management company and powers trust in the data economy by certifying businesses', compliance and security level for their customer data collection and usage across web, mobile, cloud and advertising channels. The privacy policy of Weixin has been approved in the joint review by the Cyberspace Administration of China, the Ministry of Industry and Information Technology of the PRC, the Ministry of Public Security of the PRC and the Standardisation Administration of the PRC. Our data security management has been internationally recognised – For example, Tencent Cloud have been ISO27001 (information security management), ISO22301 (business continuity) and ISO20000 (service management system) certified.



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Customer Service

The Tencent Customer Service Centre consists of more than 2,000 staff members and is responsible for handling complaints and responding to enquiries from customers for our businesses. We commit to providing solutions to our customers in a timely manner through different means including customer service hotline, online customer support, Weixin/WeChat and face-to-face meeting.

We have established the following management system to handle complaints from our customers effectively:

1. There is a designated team within the customer service department to handle complaints and deal with compensation requests. The team is responsible for conducting investigation based on the information provided by the complainant, explaining the relevant procedures to the complainant and notifying the complainant of the investigation results with the aim of providing him with a satisfactory solution.
2. For better user experience, we have established a set of complaint handling procedures which set out clearly the responsibilities within the customer service department and the timeframe within which a complaint needs to be resolved.
3. We have strengthened our system infrastructure which allows classification of complaints by urgency and risk level so that the customer service staff can better prioritise the cases and deal with the complaints in a timely manner.
4. We have a designated team of staff who is responsible for handling complaints from customers who visit our offices and for better risk control we have designed a set of protocols for different types of incidents.

Healthy Environment for our Users

One of our important businesses is our online gaming business. We need to comply with the laws, regulations and policy requirements in relation to online gaming in the PRC.

The authorities in the PRC which regulate online gaming mainly include: (i) the General Administration of Press and Publication; (ii) the Ministry of Culture and Tourism; (iii) the Ministry of Industry and Information Technology; and (iv) the State Administration for Market Supervision.

The laws, regulations and policies relating to online gaming mainly include: (i) “The Regulation on Internet Information Service of the People’s Republic of China” promulgated by the State Council; (ii) “The Provisions on the Administration of Online Publishing Services” promulgated by the former State Administration of Press, Publication, Radio, Film and Television and the Ministry of Industry and Information Technology; and (iii) “The Interim Provisions on the Administration of Internet Culture”, “The Interim Measures for the Administration of Online Games” and “The Notice on Regulating Online Game Operation and Strengthening Concurrent and Ex-Post Supervisions” promulgated by the former Ministry of Culture. The aims of such laws include the regulation of the qualifications of operating entities of online games, the regulation of the content of online games, the protection for the physical and mental health of online game users and adolescents and the privacy protection of the personal data of users.



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We have been actively implementing various measures to ensure compliance with the relevant laws, regulations and policies. For instance, we have already obtained the relevant credentials for operating online games, for example, the Telecommunication Business Operation Permit, the Online Publishing Service Licence and the Internet Culture Business Permit.

To safeguard the physical and mental health of online game users and adolescents, we have implemented the real name system and anti-addiction system in accordance with the regulatory requirements of the PRC and strengthened the promotion of healthy gaming and anti-addiction through various channels. In February 2017, we have launched a series of services on “Tencent Game Guardian Platform” (<http://jjazhang.qq.com>) which assists parents to monitor the gaming habits of their underage children. This is the platform dedicated to healthy gaming of underage children in the online game industry. In July 2017, we have implemented an anti-addiction system on Honour of Kings, which sends reminders to players or forces logout from the game if players spend too much time on the game in one day. So far it is one of the strictest anti-addiction measures taken by a gaming company in the PRC mobile game industry.

In addition, we have worked with School of Brain and Cognitive Science of Beijing Normal University and Data Centre of the China Internet (DCCI) to publish “Guide on Healthy Use of the Internet for Teenagers” and “Research on Online Gaming Behaviours of and Online Protections for Teenagers”. Parents, education institutions and industry players can download these documents free of charge for their reference.

Monitoring of and Protection for Original User-generated Content

Each of Weixin/WeChat and QQ provides a mechanism for users to report any fake or inappropriate content circulated on its platform. To protect the original user-generated content, Weixin/WeChat has launched a new feature in December 2017 for the Weixin/WeChat official account holders to declare the originality of the content generated by them on Weixin/WeChat so as to help identify and deter copyright infringement more effectively.

Intellectual Property Rights

We are a technology-oriented company and we stress the importance of the observation and protection of intellectual property (“IP”) rights. We have established a dedicated IP team with approximately 80 employees as of 31 December 2017 that is responsible for the day-to-day management of legal matters involving trademark, patent, copyright, domain names and other IP rights.



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We began a comprehensive programme for the management of IP at an early stage. We have consistently applied for the registration of IP rights since the early stages of its establishment. With the successful development of our business, we have expanded our global IP portfolio to cover more than 100 countries and regions. As of 31 December 2017, we had obtained over 14,000 officially registered trademarks and over 6,000 issued patents. Coupled with our creation of a vast amount of copyrighted content, we have accumulated IP assets of considerable value. Our IP team has developed a comprehensive database for our patents, trademarks and copyrights and our strong data analytical skills enable us to manage and monitor our IP rights in a meticulous and efficient manner. To combat infringement of IP rights, our IP team has also established a comprehensive and efficient monitoring and maintenance system, and has devised various civil, criminal and administrative enforcement measures to enforce our IP rights. Please see further details on the Company Website (<https://www.tencent.com/legal/html/en-us/property.html>).

We actively participate in public affairs and strive to promote the awareness of IP protection in the Internet industry. As members of the China National Information Technology Standardisation Committee, the China Intellectual Property Society, the Patent Protection Association of China, the World Wide Web Consortium, the International Trademark Association and the China Trademark Association, we have participated in the consultations on legislative amendments to the PRC laws and regulations relating to patents, trademarks and anti-competition and have made recommendations in the development of industry standards.

Within the past decade, we have several times been awarded “China Patent Gold Awards” by the State Intellectual Property Office of the PRC, “China Trademark Awards” jointly by World Intellectual Property Organisation and the State Administration for Industry & Commerce of the PRC and “China Copyright Gold Awards” by the National Copyright Administration of the PRC and the World Intellectual Property Organisation, signifying our contribution to the development of independent innovation of the PRC. We have also several times been awarded “National Copyright Demonstration Unit”, recognising our outstanding performance in management and protection of copyright. In November 2017, we were awarded “China Appearance Design Gold Award” by the State Intellectual Property Office of the PRC and the World Intellectual Property Organisation and this is the first time where a graphic user interface won such title.

Looking forward, we will continue to devote great efforts and resources to observe and protect IP rights.

