

CODE OF CONDUCT

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1. Message from the CEO

Dear Colleagues,

Founded in 1996, Sao Bac Dau Technologies Corporation (referred to as "SBD") has continuously grown and developed, becoming a leading brand in the field of information technology in Vietnam. SBD's reputation and credibility are our most valuable assets that we must always strengthen and maintain, as they are key to retaining both customers and talented employees, and essential to our continued success. To achieve this, SBD, in collaboration with international consultants, has been developing and implementing an Integrity Compliance Program (referred to as the "Integrity Compliance Program") applicable to SBD, its subsidiaries, and QI Technologies Corporation (collectively referred to as The Company). **The Integrity Compliance Program** includes the highest-level policy, which is the **Integrity Compliance Policy** and a system of documents to enforce this program, such as policies, regulations, and specific procedures related to all daily operations of The Company. Additionally, there is a **Code of Conduct (referred to as the "CoC")** which provides specific guidance to help employees and stakeholders make proper decisions and actions in accordance with the Compliance Program. This CoC is built upon the foundation of the **Integrity Compliance Policy** and serves as a guide for how The Company uniformly interacts with customers and partners, while also enhancing transparency in both internal and external communications.

I urge each employee to read, understand, and strictly adhere to the CoC with the highest sense of responsibility. Please always remember, our actions not only affect ourselves but also the image and reputation of The Company.

Thank you all for making integrity and dedication an indispensable part of our business operations. I trust that you will join me in our efforts to uphold our commitment to the integrity compliance, contributing to maintaining The Company's esteemed reputation, and ensuring that it remains a place where we can all be proud to work.

Date: 22 September 2026
Chief Executive Officer

(Signed)

Nguyễn Xuân Trường

2. Orientation, vision, mission and core values of The Company

2.1 Orientation

The Company, along with its closely linked and highly synergistic member companies, strives to become and maintain its position as the leading corporation in Vietnam, specializing in providing digital technology services and solutions.

2.2 Vision

To become the leading corporation in the field of providing digital technology solutions and services in Vietnam, a place where the success and pride of The Company's people converge.

2.3 Mission

With the ambition and intelligence of The Company's people, along with advanced technology from global partners, The Company invests in research and development of effective and practical digital technology solutions and services, contributing to improving quality of life and promoting the development of digital technology in Vietnam.

2.4 Core values

- Demonstrate Ambition in everything we do.
- Always Proactively in setting effectiveness is top priority
- Remain Flexible to embrace opportunities.
- Highly value Teamwork, and Collective Achievements are always emphasized.
- Understanding that resources are limited, so Efficiency is prioritized in our work.
- Always take Care of our customers with the highest level of service.

2.5 The Company's Code of Business Conduct

- Always act with honesty and ethics in all situations.
- Respect everyone.
- Lead with humility.
- Align on common goals.
- Think and act consistently.
- Focus on processes.
- Conduct business in accordance with the law and social responsibility.
- Results well told.
- Ensure quality from the very beginning.
- Prioritize customer benefits.
- Deliver value to shareholders.

3. Code of conduct introduction

3.1 Reference documents

- SBD Organizational Policy (QC 02)
- Integrity Compliance Policy (CS CMS 01)

3.2 Scope of application

- This Code of Conduct is a reference document designed to guide and assist each member of the Company in making ethical and transparent business decisions in situations where determining the appropriate course

of action is not straightforward. Additionally, the Code provides useful resources for all of us to seek guidance and report our concerns.

- The Code applies to the Board of Directors, the Executive Board, all levels of management, and employees at SBD, its subsidiaries, and QI Technologies Corporation (formerly known as Sao Bac Dau Technologies Services JSC).
- Wherever we are, each of us has an obligation to meet the standards outlined in this Code. The Company also expects its representatives, agents, suppliers, joint venture partners, and consultants to adhere to similar standards when acting on behalf of the Company.
- We all share the responsibility to act ethically and fully comply with the Code and the law. Anyone who fails to meet this responsibility may face disciplinary action, including termination of employment.
- If a law conflicts with a policy or principle in this Code, we must comply with the law. However, if a local custom or policy conflicts with the Code, the provisions of the Code must be followed. It is important to remember that in any case of conflict (or potential conflict) between the contents of this Code and legal regulations, or local customs or policies, if you are unsure how to act, you should discuss it with the CMS Compliance and Legal team before taking any action.

3.3 Definition and Abbreviation

Within this Code, when referring to:

- Abbreviation:

3.3.1. **"SBD"** is Sao Bac Dau Technologies Corporation and its subsidiaries.

3.3.2. **"QI"** is QI Technologies Corporation

3.3.3. **"The Company"** understood as SBD and QI.

3.3.4. **"CMS"** is Compliance Management System (Integrity Compliance, Anti-Corruption and Bribery)

- Definition of terms:

3.3.5. **"Company Employees"** or **"Employees"** refers to any individual working at any level under the management and supervision of the Company (including any employee who has signed a Labor Contract or is on probation, manager, member of the Board of Directors, Board of Management).

3.3.6. **"Employee Complaints"** are concerns, issues, or complaints regarding the workplace, colleagues, or their manager. Some common examples of Employee complaints include:

- Workload, such as setting unrealistic expectations for Employees or increasing their workload instead of hiring one (1) new Employee.
- Working conditions, such as health and safety hazards in the workplace or lack of cleanliness in common areas.
- Bullying, such as spreading malicious rumors about someone or intentionally excluding someone from company events.
- Harassment, such as aggressive or threatening behavior, or jokes that are distressing or inappropriate.
- Discrimination, such as unfair treatment of any individual for any reason (including but not limited to job position/gender/age/religion/region), or workplace policies/regulations that indirectly create inequality among Employees.

3.3.7. **"Business Ethics"** are ethical standards and practices that guide, evaluate, control and regulate the Company's actions during its operations to ensure that the Company conducts business in accordance with the principles of fairness, honesty, transparency, integrity, and compliance with all Company policies and procedures and applicable laws. Any action that is inconsistent with standards, business ethics, and integrity (even though such action may be customary, or performed by many individuals/organizations, or for the benefit of the Company) is considered unethical and is not accepted by the Company. Examples of unethical actions include using child labor, abusing company time, false advertising, and hostile work environment.

3.3.8. **"Company Culture"** refers to the values, spiritual assets, brand, and identity that The Company builds, maintains, and develops in its business operations and through its resources, thereby enhancing The Company's value.

3.3.9. **"Integrity"** means being upright and honest. This means that the Company and its Employees must do the right thing even when no one is watching.

3.3.10. **"Misconduct"** includes any conduct that is inconsistent with or violates the Company's Policies/Codes/Procedures/Regulations, or any law. Misconduct includes but is not limited to the following: corruption, giving-receiving bribes, fraud, collusion, coercion, obstructive conduct, and unethical conduct, illegal acts, dishonesty, and/or conduct that is likely to cause discredit, or cause financial/non-financial loss to the Company.

3.3.11. **"Corruption"** is the misuse or abuse of a person's position, duties and/or powers to achieve some personal or private benefit (for himself or for others).

3.3.12. **"Bribery"** is understood as the act of promising, committing, offering, requesting, soliciting, giving or agreeing to give or receive money, property, gifts, rewards, valuable items or material/spiritual benefits to any person in an inappropriate manner that aims to influence an action or decision to gain or maintain an unfair/non-transparent advantage.

Bribery in any form is a violation, even if the transfer of money, property, gifts, rewards, valuable items does not occur, or the material/spiritual benefits have not been received, or the purpose of Bribery is not (or has not) been implemented.

3.3.13. **"Facilitation Payments"** is an illegal or informal payment made in exchange for services that the Company is legally entitled to receive even if it did not have to make the payment. Typically, this is a relatively small payment made to a Public Official or person performing a certification function to secure or expedite the performance of a routine or necessary action such as the issuance of a visa, work permit or customs clearance.

3.3.14. **"Advantages"** may include (but are not limited to) loans, entertainment, job offers, sponsorship packages, discounts, or other intangible benefits (e.g., rewards through titles and awards, promotions, sexual bribery).

3.3.15. **"Conflict of Interest"** is a conflict of interest is a situation that occurs when there is a conflict between an employee's official duties and personal interests, where the personal interests could improperly influence the employee's performance of official duties and responsibilities. A conflict of interest is not a violation of the Integrity Policy or this Code, but failure to disclose a conflict of interest is.

3.3.16. **"Fraud"** is any act or omission, including deliberate misrepresentation and/or reckless deception or attempt to deceive a party to obtain a financial or other benefit, or to avoid an obligation.

3.3.17. **"Collusion"** means an arrangement between two or more parties to achieve an improper purpose, including improperly influencing the actions of the other party.

3.3.18. **"Coercive behavior"** is impairing or harming, (or threatening to impair or harm), directly or indirectly, any party or the property of the party to influence improperly the actions of a party.

3.3.19. **"Obstructive behavior"** is understood as:

- The intentional act of destroying, altering, modifying, or concealing documents/evidence for an investigation, or making false statements to hinder the investigation into misconduct report (s); and/or
- Harassing or threatening any individual/organization to prevent them from disclosing information they know related to the investigation.

3.3.20. **"Retaliation"** means any action or penalty imposed on an **Employee/Third Party/Related Party** in any way, whether directly or indirectly, to cause disadvantage (or threaten to cause harm) to the **Employee/Third Party/Related Party** (including but not limited to: dismissal, injury, demotion, discrimination, harassment, threats, disciplinary action, bias, or adverse treatment) because the **Employee/Third Party/Related Party** reported misconduct, or raised a concern, or participated in the investigation process, or refuse to take any action that violates (or suspects a violation) of the Company's policies/procedures/regulations.

3.3.21. **"Gifts"** or "**A benefit**" is anything of value. A gift or benefit may be a service, prize, entertainment or travel, or any item of value to the recipient (and/or a member of the recipient's family) provided by another person or entity. A gift or benefit may come from (or be provided to), for example, contractors, customers, suppliers (including potential suppliers), applicants, or other outside organizations.

3.3.22. **"Hospitality"** means the form of Company employees giving or receiving from Third Parties, customers, suppliers, partners, other related parties, etc… the following benefits:

- Entertainment activities (such as golf activities, tickets to sporting events, tickets to art shows) not within the framework of public exchanges of guests in seminars, conferences, study sessions or not within the framework of friendly sporting events widely publicized.
- Travel and/or accommodation or other benefits not associated with conferences, seminars, study tours.

3.3.23. **"Entertainment"** means any form of hospitality and/or beneficial entertainment offered, provided or promised to be provided by an individual or entity as preferential treatment, privilege, favor or other advantage to an individual. Entertainment may include invitations to sporting, cultural or social events, access to discounts and loyalty or rewards programs.

3.3.24. **"Family members"** include spouse, biological father, biological mother, adoptive father, adoptive mother, biological children, adopted children, biological siblings, sons-in-law, daughters-in-law, brothers-in-law, sisters-in-law, and biological siblings of the spouse.

3.3.25. **"Political contributions"** refer to any financial, goods, or services contributions given freely or at a discount to a political party, political official, campaign, candidate, or for political purposes.

3.3.26. **"Sponsorship"** refers to the act of providing The Company's physical, financial resources or other resources to a project, an individual, or an organization in exchange for certain benefits.

3.3.27. **"Charity"** refers to activities that help individuals facing life difficulties that they cannot change on their own. Charitable activities can include donations, monetary contributions, or gifts in the form of goods, etc. with the aim of providing humanitarian relief, poverty alleviation, or healthcare.

3.3.28. **"Public official"** includes any civil servant, public employee, person working at (or for) a State management agency regardless of rank, or person holding a management position at a State-

owned enterprise (including: Chairman of the Board of Members, Chairman of the Board of Directors, Chairman of the company, member of the Board of Members, member of the Board of Directors, Controller, General Director, Deputy General Director, Director, Deputy Director, Chief Accountant), **or foreign government officials, or any individual working in an intergovernmental international organization (such as: United Nations (UN), WHO, UNICEF, WTO, etc.)**. Public officers also include any individual who has the responsibility or performs the responsibility of a civil servant or acts in the capacity of a civil servant.

3.3.29. **"Whistleblower"** means an Employee, individual or organization that makes a complaint about conduct/situation(s) that they have grounds to suspect or consider to be Misconduct, Reportable Conduct.

3.3.30. **“Third Party”** is understood as any organization (including management, employees, contractors, persons related to the organization), individuals, joint ventures, suppliers, subcontractors, agents, other intermediary parties participating or will participate in transactions with the Company to provide goods, services related to the project of providing goods/services to the Company's customers.

3.3.31. **“Related Party”** means a Party(s) that has an interest in the Company and may affect or be affected by the Company’s business operations.

4. Company Culture

4.1 Health and safety in the workplace

- The health and safety of every Company employee is a top priority and an integral part of the Company's code of conduct. The Company’s operations comply with legal regulations and standards on health and safety, as well as its own internal policies.
- Employees are encouraged to raise concerns regarding workplace health and safety with the department responsible. If you encounter or notice any violations of safety regulations or potential dangers, it is important to speak up in a timely manner. Together, we contribute to ensuring that at the end of each workday, we can all return home to our families and friends as healthily as we were when we arrived at work.

4.2 Equality and respect in the workplace

- The Company strives to attract, train, and retain a diverse workforce. We aim to implement the Company culture inclusively, actively, and performance-oriented, enhancing global competitiveness.
- The Company is committed to and supports advancements in human rights, providing an equal working environment and complying with labor regulations in all countries around the world. The Company has zero tolerance for human rights violations, including the use of child labor, forced labor, or discrimination against any employee or candidate based on race, color, religion, ethnicity, gender, sexual orientation, age, disability, marital status, or any other protected status under the law.

4.3 Harassment, bullying, and violence

- All Company employees have the right to work in an environment that is safe, free from harassment, intimidation, bullying, hostility, or threats. Harassment is any behavior that belittles, threatens, or offends an individual, and The Company will not tolerate any form of harassment. The Company also does not tolerate any acts of violence or threats of violence that harm or threaten to harm a person physically, instilling fear of physical harm in any form (physical, verbal, non-verbal, or written, emails…), or malicious jokes that are offensive, or any rough behaviors that may cause physical harm or any lewd or inappropriate gestures or remarks that disrupt or unreasonably impede employees' work effectiveness.

- If you are being harassed, see another employee being harassed, witness or have any concerns about violence or threats of violence, or feel that you are being discriminated against or believe someone is a victim of discrimination, please speak to your direct manager, the HR manager, or other managerial staff at all levels. If you do not feel comfortable speaking with management, please report your concerns according to the Reporting Policy outlined in the Code of Conduct.

4.4 Substance abuse

- The Company maintains a workplace free from alcohol and drugs. Employees arriving at work under the influence of alcohol or substances can pose a danger to themselves and others. This standard applies to all employees while on Company premises and anywhere they are working. The Company will not tolerate the possession, distribution, sale, or manufacture of illegal substances while working or on Company premises.

4.5 The Company Property

- The tangible assets of The Company (buildings, vehicles, equipment, supplies, raw materials, etc.) and the intangible assets of The Company are tools that enable us to perform our work. Each Company employee has the obligation to protect these assets and is prohibited from using Company property for personal purposes or from abusing it, causing waste or loss.

4.6 Information System

- Employees are granted access to phones, computers, email systems, and other electronic resources to perform their work. These resources are owned and managed by The Company. Employees must use these resources professionally, ethically, legally, and in accordance with The Company's relevant policies.
- The Company owns or controls access to all communication devices, including computers, software, email, voicemail, conference equipment, and office supplies. All communications, data, and information sent or received by employees using Company property are the property of The Company and are not considered private communications.

4.7 Intellectual property, trade secrets, and confidential information

- The Company places great importance on its own intellectual property, trade secrets, and confidential information, as well as those of others. All intellectual property created, developed, or authored by Company employees while working at the Company and related to the Company's business activities is the exclusive property of the Company and must be disclosed and transferred to the Company immediately. Employees are prohibited from using the Company's intellectual property in any unauthorized manner or for any purpose other than the Company's interests. Furthermore, any use of intellectual property owned by third parties must be approved or authorized by the owner.
- Employees must maintain strict confidentiality and are not allowed to disclose or externally use the Company's trade secrets and other confidential information without the Company's consent. Additionally, employees must not use or induce others to use trade secrets and confidential information belonging to others, such as former employers or competitors, without the permission of the information owner. Employees are also required to comply with confidentiality obligations related to information received from third parties under confidentiality agreements as part of their work.

4.8 Social media

- Social media is one of the powerful communication tools both inside and outside The Company, offering various ways to interact with customers, colleagues, and the world in general, while helping us build more sustainable and successful business relationships. However, social media platforms also carry certain risks. Employees must be aware of the implications of participating in social media and online conversations that mention The Company, and they must also recognize that The Company's image can be represented through their own behavior in these contexts.

4.9 Privacy and data protection

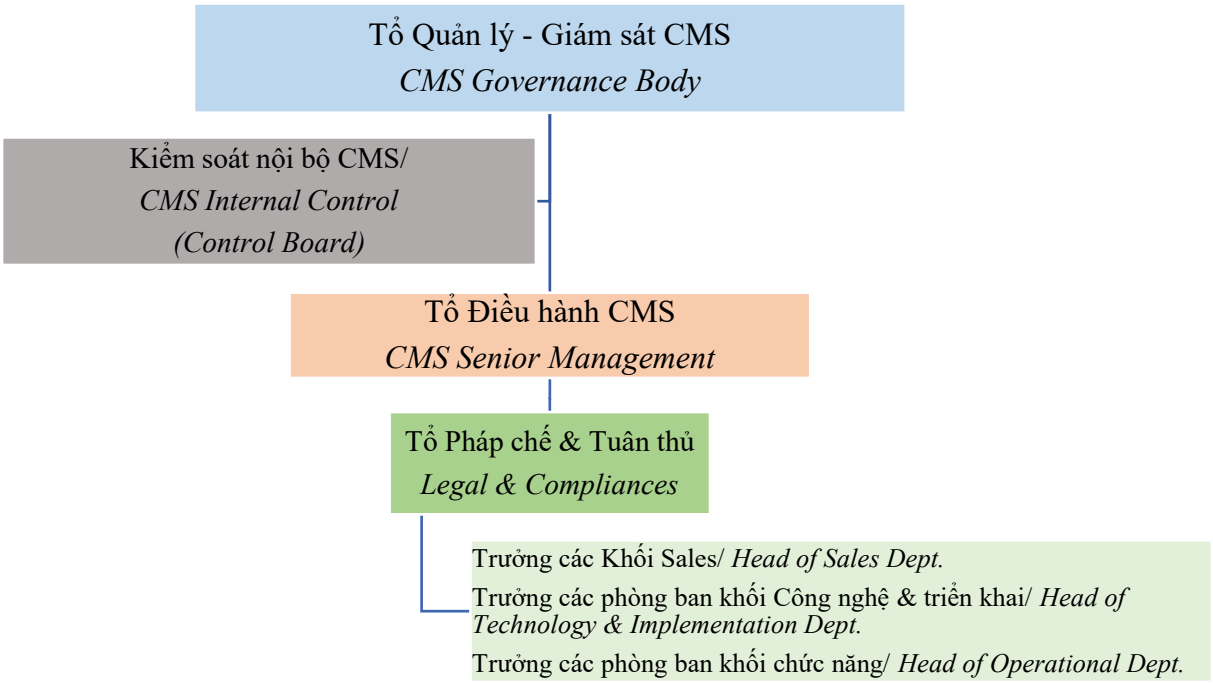
- When working at The Company, we often have access to confidential, non-public information about The Company and its operations. We all have an obligation not to share this information with anyone outside the Company unless we have approval, and the disclosure complies with Company policy.
- During normal business operations, we also frequently maintain and process personal data of Company employees and may process personal data of external parties in a similar manner. The proper handling of such data is governed by various legal regulations, and we are committed to fully complying with those regulations. To ensure compliance with legal standards and regulations, all Company employees, regardless of their location, must:
  - Only access personal data when authorized.
  - Protect personal data from loss, misuse, or disclosure.
  - Immediately notify management if employees know or suspect a violation may occur.

5. Honest Business

5.1 Prohibition of misconduct

- As a leading enterprise in the field of information technology, the Company complies with the laws of the Socialist Republic of Vietnam and all regulations of countries around the world on anti-corruption, bribery and conducting business with integrity, transparency and ethics.
- The Company has built and deployed the Compliance Management System - CMS and applied it throughout the whole company. The CMS Task force has been established and operates with the role of monitoring, implementing and evaluating compliance with the Integrity Policy at the Company.

Org. chart of the CMS Task Force



Org. chart explanation: CMS Task Force main roles

- **CMS Governance Body:**
  - Responsible for oversight of CMS, sits above operational decision of top management.
  - Approves The Company **Integrity Compliance Policy**

- **CMS Internal Control (Control Board)**

  Responsible for ensuring compliance with regulations relating to the Integrity Policy. This includes responsibility for planning and assessing the CMS, including providing feedback on whether the CMS has been properly implemented, whether relevant policies have been followed and whether there are any weaknesses in internal controls.
- **CMS Senior Management**
  - Monitor the implementation of the Integrity Policy.
  - Fully prepare resources to support and ensure the effectiveness of the CMS.
  - Approval of CMS Enforcement Procedures and Regulations.
  - Communicate the CMS policy to all employees.
- **CMS Legal & Compliances**
  - Design the content of the CMS (with a mechanism for strict management and supervision of compliance with The Company's Policies, Code of Conduct, Regulations, Processes, and Rules)
  - Supervise the Implement of CMS in the whole Company.
  - Support and advise the Senior Management about all CMS related matters.
  - Propose reform measures to enhance the transparency, ethics, accountability, competence, and effectiveness of the departments within the Company.
  - Report directly to the CMS Governance Body without going through the Senior Management in cases where the Senior Management does not make decision within the timeframe set by the CMS Process(es)/Regulation(s), or when report(s) of misconduct involve the Senior Management, or in other case(s) deemed necessary by the CMS Legal & Compliances.
- **Head of: Sales Dept., Project Implementing Dept., Functional Dept.**
  - Implement, deploy and ensure the compliance management system (integrity in business), Policies, methods of anti-corruption and bribery to employees within his/her department, division.
  - Provide awareness training and coaching on integrity in business, anti-corruption and bribery to employees within his/her department.
  - Advise and propose solution(s) to ensure integrity and anti-corruption, and anti-bribery in business.
  - Propose reform measures to enhance transparency and raise awareness of integrity in business, anti-corruption, and anti-bribery practices.
  - Communicate and remind employees within his/her department to fully participate in training activities and complete awareness-raising tests on integrity in business and anti-corruption, anti-bribery practices at The Company

– The Company has issued an **Integrity Policy**, under which the Company strictly prohibits and has zero tolerance for any misconduct, whether direct or indirect, in any form (including: corruption, giving or receiving bribes, fraud, failure to disclose conflicts of interest, collusion, coercive conduct or any other unethical conduct and/or deceitful conduct of any kind). This Standard applies to all misconduct whether committed by Company Employees or by third parties acting on behalf of the Company.

– The commission of misconduct is not limited to the transfer of money or money equivalents. It is wrong to provide, donate or transfer any item of value with the intention of improperly influencing the recipient. The misconduct include but are not limited to the following acts and/or forms of transfer, donation or supply:
  - Money or items that can be readily converted into cash, such as stocks or securities.

- Improper discounts or commissions
- Bribes, facilitation payments, allowances, expenses and contributions for charitable or sponsorship purposes that are unusual, excessive and disguised.
- Entertainment or hospitality.
- Agreements to not bid or bid rigging, collusion or suppression of competition in bidding.
- Provision of any item of value to the recipient, a member of the recipient's family including job offers or promises, paid/unpaid internships, payment of educational expenses.
- Fraud (such as false bookkeeping or non-compliance with accounting standards, submitting false reports on expenses, taking or misusing Company assets, money, etc.) and other forms of corruption.

– We should be especially careful when interacting with government officials. In all cases, The Company employees are not allowed to give gifts, host meals, or provide hospitality to any public officials, regardless of their rank (collectively referred to as 'public officials'), without prior approval from the appropriate management level of The Company. No employee, agent, consultant, or other representative of The Company, or acting on behalf of The Company, has the authority to offer any items or anything of value to any public official who oversees any aspect of The Company's operations. This also applies to monetary gifts as well as non-monetary items such as meals, transportation, accommodation, services, entertainment, and any other personal benefits. Any action by an Employee regarding giving gifts, organizing meals, etc. for Public Officials must be in accordance with the Company's regulations on reception, events, gifts and hospitalities (QD CMS 01).
– No matter where you are, remember that you will not face any form of disciplinary action or any adverse consequences if you refuse to accept or give a bribe, or if you refuse to engage in any misconduct, even if your refusal results in The Company suffering a business loss. In any case of refusal to accept/give a bribe or refusal to commit any misconduct, the Employee must immediately report it to the Company.

5.2 Conflicts of interest

– All business decisions we make as The Company employees must be based on the needs of The Company in accordance with legal regulations and ethical standards in business, not for personal benefit or relationships.
– Conflicts of interest can be actual, potential or sometimes perceived by individuals. Conflicts of interest can arise from various issues; some forms are obvious while others are more difficult to detect. Here are some areas where conflicts of interest may occur:
  - Financial interests: if a Company employee or their friends or family benefit financially from any third party influenced by their actions as a Company employee.
  - Close relationships: if we are interacting with relatives or friends who are suppliers or customers of The Company, this may also indicate a conflict of interest. In such situations, if approved by The Company, we must not allow personal relationships to influence or appear to influence our ability to act for the best interest of The Company
  - Outside business opportunities: In some cases, you may take on work, investments, or other business opportunities outside of your role at The Company, as long as these outside activities do not interfere with your responsibilities at The Company. However, be aware that working, investing, or interacting externally with competitors, suppliers, or customers of The Company can also lead to conflicts of interest.
  - Opportunities arising from The Company: Company employees are not allowed to exploit investment or business opportunities they become aware of through their work at the Company for personal gain, unless this action has been previously approved.

- Conflict of interest is not a violation, as long as the Employee has disclosed and reported the conflict of interest according to the conflict-of-interest registration process. Concealment and failure to report and/or obtain appropriate approval for a conflict of interest is a violation.
- Remember: Reporting conflict(s) of interest or situation(s) that may lead to conflicts of interest does not mean that you are prohibited from participating in related activities. Instead, The Company may assess the situation specifically and discuss with you how you can engage in those activitie(s) safely and appropriately.

5.3 Anti-money laundering

- Money laundering is the process of "converting" money obtained from illegal activities into money that is considered legal. The Company complies with all regulations regarding anti-money laundering. If any employee observes any activities resembling money laundering, they must report it immediately to The Company.
- Currently in Vietnam, money laundering is "hiding" in many different forms, including a few forms such as:
  - Establishing a "shell company" to buy and sell goods for short.
    With this form, individuals/organizations establish a "shell company" but the operation of this "shell company" is not to perform business functions but to launder illegal money sources, through fake contracts for buying and selling goods with other companies. This "shell company" pays for fake contracts and receives legal money from other companies.
  - Hiding behind fundraising and charity projects.
    Accordingly, organizations/individuals named as "investors" set up fake fundraising projects on online platforms to collect money through online payments. These investors may use fake names or fake registered IP addresses to set up an online fundraising project. In this way, investors can attract cross-border funds to the charity fund and can withdraw them legally.

5.4 Gifts

- Occasionally, simple gifts can foster goodwill and build trust in business relationships. However, excessive or overly expensive gifts can create a sense of unfairness in business decisions. We all have a responsibility to ensure that any gifts we are allowed to give or receive, if related to our work at The Company, are reasonable and consistent with the Company's policies and the law.
- When employees give gifts to partners, the gifts must be products that have been approved by The Company's authorized personnel, and expenditure records must be properly maintained to accurately reflect the related costs. Whether we are the giver or the receiver, gifts must be:
  - On a voluntary basis.
  - Given and received openly and transparently.
  - Infrequent and the value does not exceed the limits set by The Company.
  - Directly stemming from sincere and good faith efforts to build relationships with customers or suppliers.
  - Not tied to a potential contract, business bid, or other commercial opportunities.
  - Consistent with business norms and local culture.
  - Reported in accordance with all existing policies.
  - Not likely to lead to misconduct or favoritism.
  - Reported and registered according to regulations on reception, events, gifts, hospitality (entertainment - hotel - tourism) issued by the Company.

5.5 Meals, seminars/conferences, and hospitality

- Employees of The Company may organize or attend simple meals that align with the purpose of the meal or event related to business activities, ensuring compliance with The Company's relevant regulations.
- Employees may participate in event(s) such as seminars or conferences organized by clients/partners/suppliers related to the Company's business activities. However, it must be ensured that information about the seminar or conference is clearly and fully reported prior to attendance and is in accordance with The Company's relevant regulations.
- All employees of The Company are prohibited from providing and/or receiving hospitality as defined in section 3.3.22.
  Note: The Company has issued detailed regulations on how to carry out activities related to reception, events, gifts, and hospitality (QD CMS 01) and employees must comply with these regulations.

5.6 Political contributions

- The company believes that it should not engage in political matters. The company and any of its employees are not permitted to donate money, property, resources, gifts, meals, entertainment, or services from The Company to any political officials, candidates, election campaigns, political parties in Vietnam and all countries worldwide, or any international organizations that include members from countries or territories and/or governments of those countries or territories.
- The company encourages all employees to exercise their civic rights by voting for candidates they deem suitable. When employees choose to participate in such activities, they do so as individuals and privately, as responsible citizens, not as representatives of The Company. No employee is allowed to use any funds, property, or any other resources of The Company in connection with any political activities.

5.7 Sponsorship and Charitable Contributions

All sponsorship agreements and any charitable contribution proposals must be approved by the authorized personnel of The Company, ensuring compliance with The Company's internal policies, procedures, and relevant legal regulations; they must also be made public through meetings, media, annual reports, and other available channels. All related records and documents must be clearly prepared, accurate, and stored in accordance with regulations.

5.8 Independent and Fair Competition

- The Company is committed to competing based on quality, price, and reputation. We will never seek business advantages by engaging in activities that violate ethical business practices and laws.
- The Company will always compete vigorously, independently, and fairly. Among other factors, this means that we will make all competitive decisions— including those related to pricing, bidding, and sourcing—independently from our competitors. The consequences of violating antitrust laws are severe, which can include criminal liability for any individuals involved in the violation, as well as serious repercussions for The Company.
- The company's policies strictly prohibit any agreements, whether formal or informal, including non-binding agreements, with any competitors aimed at restricting competition/colluding in business in any form. Additionally, to avoid any inappropriate conduct, The Company prohibits any discussions between The Company and any competitor regarding sensitive competitive information. All employees are required to adhere to the following principles regarding any interactions with competitors:
  - Do not discuss current or future prices, quotes or bid prices, pricing policies, discounts, rebates, credit terms, or any other terms or conditions.
  - Do not discuss cost, profit, or profit margin information.
  - Do not discuss current or future business plans.

- Do not discuss refusing to do business with any suppliers or customers.
- Do not agree with the types of products we will provide (or not provide) or the terms and conditions under which we will provide products.
- Do not discuss or agree on any content regarding customer allocation or market division.
- Do not exchange confidential information of The Company or its customers and suppliers.

– If a competitor brings up an inappropriate topic of conversation with you, you should stop the conversation immediately and not continue talking out of politeness and officially report to the company. If interacting with competitors is part of your normal business role (e.g., buying or selling products to competitors or engaging with them as part of trade association activities as a member…), you must limit your interactions with competitors to normal business transactions that fall under your responsibilities. You must not exchange sensitive competitive information with competitors or use a competitor's contact information as a source of competitive intelligence.
– The Company's policies also require that we always compete fairly, which means "winning" in the market by offering better products and services, providing customers with more attractive prices, terms, or policies, having a better reputation or brand value, and investing to improve The Company's services. On the other hand, conduct that has no purpose other than to give the Company an unfair advantage or to harm a competitor may be considered unfair competition and inconsistent with Company policies.

5.9 Insider trading

– "Internal information" refers to any non-public information that is significant enough to potentially affect the company's stock price if disclosed, which may include information about major contracts, expected revenues, or the buying and selling of a business unit.
– Employees of The Company must not use the company's Internal information or that of any other company to engage in insider trading or share this Internal information with anyone else for the purpose of trading those securities.

5.10 Record keeping

All records related to The Company must be maintained completely, accurately, and promptly, reflecting the true business and financial situation in accordance with The Company's ethical and business standards. The Company will not tolerate any activities that conceal the company's financial operations from any relevant authorities/ organizations/ or individuals.

6. Reporting Policy

6.1 Reportable behavior

– Whenever an Employee becomes aware of any misconduct and/or has reasonable grounds to suspect misconduct, an incident or situation that is inappropriate in relation to any Company policy or regulation (collectively, "Reportable Conduct"), they shall report it immediately. This includes any Misconduct committed or suspected of being committed by a Third Party, a supplier or any other entity that has any dealings with the Company.
– Any complaint that a person has been retaliated against or otherwise treated adversely as a result of a violation of the whistleblower protection policy shall also be considered Reportable Behavior and shall be addressed in accordance with this reporting policy and other relevant Company policies/procedures. For detailed provisions on the prohibition of retaliation, Employees shall refer to Section 8 - Anti-Retaliation Policy.
– If an Employee wishes to seek advice on the Company's policies/regulations/procedures or information relating to the type of Reportable Behavior, the Employee may ask questions and submit them to the Company using the information in section 6.5 - Reporting Channels stated in this reporting policy.

6.2 Reporting Procedures

- Reports can be made through the channels outlined in Section 6.5. The Company does not expect employees to have absolute proof of Reportable behavior, but the content of the employee's report should state the reasons for their concerns and fully disclose relevant details and supporting documentation.
- In each case, employees will need to report their name, Department, email, phone number, contact address (if they are willing to provide it). The nature of the Reportable Behavior including the name(s) of those involved, and all relevant events that led to the Reportable Behavior.
- Employees may also choose to report anonymously and can remain anonymous during and after the investigation process. You may choose to refuse to answer questions that you feel could reveal your identity at any time, including in all conversations. The Company respects employees' rights to remain anonymous. However, choosing to report anonymously may make any Company investigation more difficult and decrease the likelihood of success if the identity of the reporter cannot be determined and no further assistance is received from the reporter. If an employee chooses to report anonymously, they should maintain communication with the company to facilitate follow-up on any questions raised or feedback provided.

6.3 Receiving Reports and Investigations

- All reports received will be kept confidential by The Company in accordance with relevant policies under the Whistleblower Protection Policy, following The Company's investigation process in compliance with legal regulations or based on specific events and circumstances. The Company will promptly, thoroughly, and impartially receive and investigate all reports. All reports will be reviewed to determine what appropriate action should be taken, including whether the report falls within the scope of review and investigation. While not all reports will necessarily lead to an investigation, they will be evaluated to decide whether an investigation should occur.
- The reporter will be informed about the progress and outcome of the investigation after the report has been addressed. However, in some cases, depending on considerations of privacy, confidentiality, or other legal constraints, there may be limitations on the feedback that The Company can provide to the reporter.

6.4 Consequences of Violating Reporting Policies and/or Submitting False Reports

- Failure to comply with the Reporting Policy and/or to take reasonable steps to prevent, detect, or report Reportable Behavior may be considered a violation. The company will not tolerate any employee who intentionally submits false reports without reasonable grounds that affect the reputation or dignity of any individual or organization. Any deliberate misconduct will be treated as a serious issue and may result in disciplinary action, including termination of employment.

6.5 Reporting channels

6.5.1 Channels for reporting actual or suspected violations

Note: The list of accounts authorized to receive reports and information submitted through the four channels below is provided in **Appendix 3 of this Code**. Responsibility for updating such information in the event of personnel changes is also set out in Appendix 3.

- For SBD employees:
  - ✓ Email: Compliance-CMS@saobacdau.vn
  - ✓ *http://cmsreport.saobacdau.vn*
  - *Note: In the event that an actual or suspected violation and/or misconduct may involve any of the individuals designated to receive reports (as listed in Appendix 3 to this Policy), SBD Employees/ Whistleblowers may choose to submit their report directly to the Chairman of the SBD Board of Directors or the Head of the CMS Governance Body.*
- For QI employees:

- ✓ Email: Compliance-CMS@qi.com.vn
- ✓ *http://cmsreport.qi.com.vn*

- *Note: In the event that an actual or suspected violation and/or misconduct may involve any of the individuals designated to receive reports (as listed in Appendix 3 to this Policy), QI Employees/ Whistleblowers may choose to submit their report directly to the Chairman of the SBD Board of Directors or Chairman of the QI Board of Directors or the Head of the CMS Governance Body.*

6.5.2 Channels for receiving employee complaints

- For SBD employees:
  - ✓ Email: Complaint@saobacdau.vn
- For QI employees:
  - ✓ Email: Complaint@qi.com.vn

6.5.3 Channels for receiving inquiries and consultations regarding CMS policies and regulations

- For SBD employees:
  - ✓ Email: Question-CMS@saobacdau.vn
  - ✓ Phone: (+84. 28) 37700968 –8744 & 8681
- For QI employees:
  - ✓ Email: Question-CMS@qi.com.vn
  - ✓ Phone: 1900633827

6.5.4 Channels for receiving reports when whistleblowers need protection

- For SBD employees:
  - ✓ Email: WPO@saobacdau.vn
- For QI employees:
  - ✓ Email: WPO@qi.com.vn

7. Whistleblower protection policy

- The Company understands that you have carefully considered raising your concerns, and the Company is committed to ensuring that you will not be subjected to unfair treatment or become a victim of retaliation for making a report in accordance with the reporting policy.
- The Company is committed to treating all employees fairly and taking all necessary measures to protect employees who report or attempt to report or raise concerns about Reportable Behavior, as well as protecting those cooperating with the competent authorities, individuals/organizations conducting investigations into the Reportable Behavior (according to The Company's investigation process, and/or investigations carried out by competent state authorities in accordance with the law). Whistleblower protection measures may include, but are not limited to:
  - Protecting the whistleblower's identity.
  - Protection from adverse treatment or any form of retaliation.
  - Keeping the whistleblower's identity confidential from any competent state authorities within the limits of the law (if the Reportable Behavior is referred to the competent state authorities for resolution in accordance with the law).

  These protection measures are applied from the time the report is made. Accordingly, the Company keeps all information related to the Reportable Behavior confidential, including the identity of the whistleblower; The Company will not disclose the whistleblower's identity (unless the whistleblower agrees to the disclosure, or disclosure is required by law or by other provisions in The Company's internal policies); ensures that the information in the report is only disclosed to the extent necesary to conduct the

investigation; and takes other reasonable steps according to the investigation process to implement the reporting policy as well as the whistleblower protection policy.

- Details on whistleblower protection: see the Whistleblower Protection Policy document (CS CMS 02) and refer to the Investigation Process (QT CMS 03).

8. Anti-Retaliation Policy

- The Company prohibits retaliation of any kind against an Employee for raising a concern, asking a question, or reporting Misconduct, or participating in an investigation of any alleged violation, or refusing to participate in suspected Misconduct, or exercising an Employee's workplace rights. Retaliation is prohibited even if the report(s) raised are not investigated or the investigation results in no Misconduct being committed.
- However, the Anti-Retaliation Policy does not exempt an Employee from the consequences of knowingly making a false report or providing false information during an investigation or taking action(s) in bad faith.
- If an Employee suspects or is facing any retaliation or notices any retaliation against another, they should immediately report it to the Company through the Reporting Channels listed in Section 6.5 of the Code. By reporting retaliation, Employees are giving the Company the opportunity to address the issue and protect those in need.
- Any retaliation or adverse treatment against an individual for seeking guidance or reporting known or suspected violation(s) is considered a violation and will be subject to disciplinary action, up to and including termination or dismissal.

9. Internal communication and training

9.1 Internal communication

The contents of **the Code** along with all related policies/procedures/regulations are posted on The Company's internal websites as follows:

- **For SBD**:
  https://intranet.saobacdau.vn/sites/DC/H%20thng%20QL%20tun%20th%20Cisco%20Chnh%20sch%20lim%20chnh%20WB/Forms/AllItems.aspx

- **For QI:**
  \\10.10.9.3\qi-technologies\3. Quan ly tuan thu (chong tham nhung hoi lo)

In addition, **The Code** and related policies/procedures/regulations are updated in full and in a timely manner via email to all Company employees.

9.2 Internal training

- This Code and related CMS policies are included in internal training programs for employees. The Company ensures that all employees must complete the internal CMS training.
- The training program follows The Company's training process:
  - *Orientation training on general CMS knowledge for new employees joining the Company.*
  - *Annual re-training (conducted every 12 months).*

10. Standards of Employee Conduct and Responsibility

10.1 Standard of behavior for management

- The management, who are managers of other employees, have a special responsibility to adhere to the Code of Conduct. Management is often the first point of contact when an employee raises concern. It is important that anyone in a managerial position listens carefully and responds appropriately.
- As a manager, being a role model as an ethical leader will help reinforce The Company's culture of ethics and compliance more than anything else you can do. You are also responsible for closely monitoring the compliance with the Code of Conduct of the employees you manage and ensuring that third parties working with our employees are aware of and comply with The Company's policies.
- Few management responsibilities are more important than how you (as a managing) receive and address or escalate employee concerns to his higher management. When he/she (an employee) reports concerns to you, you have an obligation to:
  - Listen to and assess the concern.
  - Address the concerns appropriately in each situation.
  - Escalate the concerns to your superiors when necessary to ensure they receive timely and get appropriate attention from the responsible departments and senior management.

10.2 Actions and responsibilities of employees (at all levels)

10.2.1 Read, understand, and comply with the Code of Conduct, The Company's Integrity Integrity Compliance Policy, and those of technology partners with whom the Company collaborates.

10.2.2 Adhere to The Company's regulations, procedures, and policies during your employment. This includes reporting all actual and suspected instances of Misconduct and/or violations of any Company policies, procedures, regulations.

10.2.3 Participate in and complete periodic internal training and communication programs regarding compliance with the Code of Conduct and Policies.

10.2.4 Report all conflicts of interest including relationships between the Employee and any customer/partner/supplier or any third party involved in the Company's business or situations that may give rise to a conflict of interest.

10.2.5 Foster a culture of reporting by reporting any violations or suspected violations of the Code of Conduct, Policies, regulations, procedures of The Company, as well as any actions that may violate the laws, generate benefit for specific groups.

10.2.6 Provide feedback, develop, and implement reporting policies, whistleblower protection policies, and mechanisms for reporting violations.

10.2.7 Maintain records in accordance with The Company policy to ensure transparency in business operations.

10.2.8 Contribute to the development of processes for addressing violations and behaviors that do not comply with the Code of Conduct, Policies, regulations, and procedures of The Company.

10.2.9 Seriously manage and utilize Company assets.

10.2.10 Cooperate with relevant departments/divisions in all investigations/audits/assessments related to anti-corruption, bribery, and violations of the Code of Conduct/Policies.

10.3 Prohibited actions for all employees

10.3.1 Abuse of position or authority to appropriate Company assets or engage in any act for personal gain.

10.3.2 Embezzlement of Company assets.

10.3.3 Committing acts of collusion or coercion.

10.3.4 Committing acts of bribery in any form (including giving and receiving).

10.3.5 Inciting or facilitating others to commit illegal acts, violations of the Code of Conduct, Policies, regulations, procedures, and Company rules.

10.3.6 Concealing, failing to report, or supporting acts of corruption, bribery, or violations of the law/the Code of Conduct, Policies, regulations, procedures of The Company.

10.3.7 Establishing secret funds or assets outside The Company's records.

10.3.8 Engaging in retaliation, hostility, or any acts that disadvantage whistleblowers reporting corruption, bribery, other violations, or behaviors inconsistent with the Code of Conduct, Policies, regulations, procedures of The Company.

10.3.9 Neglecting to manage and supervise compliance with the Code of Conduct, Policies, regulations, procedures of The Company.

10.3.10 Failing to provide or provide incomplete or inaccurate information about relationships with any customers/partners/suppliers or any third parties related to The Company's business activities or situations that may cause conflicts of interest.

10.3.11 Oneself or on behalf of The Company making or soliciting political contributions, sponsorships, or charitable donations (or calls for donations) that do not comply with Company regulations.

10.3.12 Engaging in activities that are inconsistent with The Company's regulations regarding gifts, meals, hospitality, etc., with partners, customers, or any third parties related to The Company's business activities.

10.3.13 In relation to bidding activities: approaching or engaging in any acts before, during, or after bidding with customers or investors (in any form) aimed at influencing the bidding outcome, manipulating, or colluding in the bidding process.

10.3.14 Committing fraud, creating false documents/records.

10.3.15 Intentionally reporting falsehoods that affect the reputation and credibility of other individuals or organizations.

10.3.16 Engaging in discrimination based on race, gender, ethnicity, religion, region, etc., or any actions that violate the health, safety, and human rights of others.

10.3.17 Threatening, retaliating against, harassing whistleblowers, or disclosing their information.

10.3.18 Exploiting reporting, notifying, or providing information about violations of laws, the Code of Conduct, Policies, regulations, procedures of The Company to defame other individuals or organizations.

10.3.19 Obstructing or interfering with the detection, investigation, or handling of misconduct, violations of applicable laws, the Code of Conduct, Policies, regulations, procedures of The Company.

11. Questions & Answers

Examples of situations with appropriate behaviors:

Case 1:

Q: You have been assigned by the Company to handle the licensing procedures to ensure operational conditions for the Company's new business sector. When you submit the application to the competent authority to complete the procedures as required by law, an officer in charge of processing the Company's application offers to assist with the licensing but requests payment to be made to him. You know that this payment is highly suspicious, but you also want to complete the licensing application as soon as possible. What should you do in this situation?

A: You should not agree to pay the amount requested by the officer and must report this immediately to The Company. This payment is highly suspicious and could be seen as a form of bribery or kickback, which violates the Code of Conduct, Company policies, and the law.

Case 2:

Q: **The supplier** is celebrating their anniversary and has given me a commemorative medal with the supplier's name on it. Is it acceptable for me to accept it?

A: You may accept it if the commemorative medal has symbolic value. However, if the medal has significant value (for example, if the engraved name of the supplier is gold-plated or the material of the medal is of considerable worth), you should politely decline it to the supplier and report it to the Company.

Case 3:

Q: A friend sent me an email containing non-public information about the marketing and pricing strategies of a competitor to the Company, even though I did not request that information. What should I do?

A: You need to immediately delete the email containing that information and inform the sender about the accidental disclosure. It is important to note that if you have read that information, you must not disclose it to any third parties.

Case 4:

Q: I have been working with a distributor for many years. Recently, the distributor offered me **a trip abroad as a gift**. Can I accept it?

A: This gift from the distributor is intended solely for you and not for a large group of employees at The Company. Therefore, if you accept it, you will violate The Company's Code of Conduct due to a conflict of interest, and it would not comply with the regulations regarding gifts and entertainment. You need to document the situation, find a way to politely decline the distributor, and report it to The Company.

Case 5:

Q: I am responsible for purchasing office supplies for the Company. My brother works for Company X, which specializes in providing office supplies. Can I buy office supplies from Company X? What should I do?

A: First, you need to document the situation and report it to The Company to obtain the appropriate approval, as your relationship may affect your ability to perform your duties at The Company when purchasing office supplies. Additionally, you should not participate in the evaluation process of Company X or any transactions with Company X.

Case 6:

Q: I know that my manager has received a gift that I believe is not in line with The Company's policy. If I report this issue, will my manager receive the report? Will I be retaliated against for making the report?

A: Any concerns reported through the designated reporting channels are designed so that the individuals involved do not receive notifications or access to the reports in which they are named, regardless of their position in The Company. This allows for independent investigations to proceed continuously. The Company has a zero-tolerance policy for retaliation, so if your manager retaliates against you, you should report this issue separately, and it will be addressed by The Company accordingly.

Case 7:

Q: My department has recently transitioned to a new manager - A. I've noticed that A is very close to me when we review work reports together. A also frequently touches my hand or shoulder when we discuss work. I've tried to keep my distance, but A doesn't seem to understand the message and continues this behavior. What should I do?

A: You should directly tell A that this behavior is making you uncomfortable and needs to stop immediately. If you don't feel comfortable doing that, you can file a complaint through the reporting channels mentioned in the Code of Conduct. There is no reason for you to feel uncomfortable at work, and there is no valid justification for A's behavior.

Case 8:

Q: My Anh is attending a conference in Hanoi and she accidentally left her laptop at a café. When she returned to her hotel in the evening to rest, she realized that her laptop was missing. The laptop contains confidential information of The Company, so she plans to go back to search for it the next morning. Is that all My Anh needs to do?

A: No. If My Anh's laptop contains confidential information of the Company, upon discovering that it is missing, she should immediately contact the IT Department and her manager to report the incident.

Case 9:

Q: Question: Hoàng Nguyên is reading social media posts and discovers some statements about the Company that he knows are inaccurate. Should Hoàng Nguyên respond and correct the misinformation?

A: Hoàng Nguyên should not respond or correct the misinformation himself. Although Hoàng Nguyên's intentions are good, only certain positions within the Company have the authority to speak or post content on behalf of the Company. Therefore, Hoàng Nguyên should immediately inform the Company about the inaccurate statements so that the Company can address them appropriately according to its policies."

Case 10:

Q: You are responsible for contracts with subcontractors. Recently, a subcontractor sent you an expensive Rolex watch along with a note that says, 'Thank you for your continuous support. We look forward to collaborating with you for many more years!' You don't want to offend the subcontractor, but you also feel uncomfortable accepting such a lavish gift. What should you do?

A: You should not accept this gift from the subcontractor. While giving a watch is a polite gesture, the value of the watch may imply an inappropriate influence on your decisions. As an employee of the Company, our relationships with subcontractors and decisions to engage in transactions must always be based on merit, not on gifts. If you have concerns or feel that returning the gift may offend the subcontractor, you should report it to the Company or contact the CMS Legal Department for assistance.

Case 11:

Q: Hồng Đăng is having lunch at a technology exhibition and is sitting next to Minh An, an employee of a competitor. Minh An asks Hồng Đăng if the Company plans to move into any new product areas and mentions that Minh An's company will be launching a new product that competes with the Company. What should Hồng Đăng do in this situation?

A: Hồng Đăng should refuse to discuss this matter with Minh An as it is a confidentiality issue. If Minh An continues to pursue this topic, Hồng Đăng should excuse himself and leave the conversation.
Case 12: **Q:** I received a request to participate in a survey that includes questions about my position and role at the Company. Am I allowed to participate? **A**: If you are conducting the survey on behalf of the Company, you must ensure that the survey clearly states its purpose, how the results will be processed, how data will be kept secure, and whether the data will be submitted as anonymous feedback. If you have any questions regarding the scope or nature of the survey, please contact or report to the Company. If you participate in the survey as an individual, while participation is voluntary, you should decline to participate if asked to disclose any information about the Company
Case 13: **Q**: I accidentally received an email with attached salary information of another person. How should I handle this? **A**: Since you have no work-related reason to receive and use this information, you must immediately inform the sender that they have sent the information to you by mistake. You should not disclose this information to anyone else, as doing so would be considered a violation of the Code of Conduct.

12. Employee Confirmation

According to The Company's training process, the HR Department organizes for employees at all levels to sign and properly store records using the following templates:

- Initial signing (all employees including new hires):
  Applies according to **Appendix 1 template** attached to this Code of Conduct.
- Re-signing (re-training every 12 months):
  - For employees (level: below the Department Head): applies according to **Appendix 1 template**.
  - For employees (level: Department Heads and above): applies according to **Appendix 2 template.**

CODE OF CONDUCT
APPENDIX 3 – List of Positions Receiving Information

Date updated: 22/09/2026

- **List of Positions Receiving Information from email (Published in section 6.5 - Code of Conduct - CoC)**
- **Change management:** When there is a personnel change, Legal SBD and Legal QI must send the information to QM SBD to update the list. The IT departments of SBD and QI will adjust access rights according to this change.
  - **Note:** Where information is received through a reporting channel that is not designated to handle such matters, the personnel specified in Column (6) of the table below shall, within eight (8) working hours, be responsible for forwarding all received information to the appropriate reporting channel identified in Column (2).
    Example: if an individual mistakenly submits a complaint-related matter through the CMS inquiry channel (Question-CMS@saobacdau.vn), the person designated in Column (6) shall promptly transfer the received information to the complaint reporting channel Complaint@saobacdau.vn.

SBD:

No.	Email/ link	Function of each email	Accounts receive email	Accounts have right to use the according email to send feedback/reply mail	Responsibility for Redirecting Misrouted Information
(1)	(2)	(3)	(4)	(5)	(6)
1	Compliance-CMS@saobacdau.vn http://cmsreport.saobacdau.vn	Receiving cases of reportable behaviors (actual or suspected violations)	1. Chairman SBD Corp. – BoD- Nguyễn Đức Quang quangnd@saobacdau.vn 2. Head of Governance Body CMS- Đỗ Văn Hào- haodv@saobacdau.vn 3. CEO - Nguyễn Xuân Trường 4. Legal Team Leader - Trịnh Thị Duy Hiền 5. Quality Director Nguyễn Bùi Châu Nhi	1. SBD Legal team leader - Trịnh Thị Duy Hiền 2. Quality Director Nguyễn Bùi Châu Nhi	Trịnh Thị Duy Hiền (Primary responsibility and cc Nguyễn Bùi Châu Nhi in the email)
2	Complaint@saobacdau.vn	Receiving employee complaints.	1. CEO- Nguyễn Xuân Trường 2. Chief Operating Officer- Tạ Thị Hồng Đào	1. Chief Operating Officer- Tạ Thị Hồng Đào	Tạ Thị Hồng Đào (Primary responsibility and cc

					Nguyễn Xuân Trường in the email)
3	Question-CMS@saobacdau.vn	Receiving inquiries/consultations regarding CMS policies and regulations	1. SBD Legal team leader - Trịnh Thị Duy Hiền 2. Quality Director Nguyễn Bùi Châu Nhi	1. SB Legal team leader - Trịnh Thị Duy Hiền 2. Quality Director Nguyễn Bùi Châu Nhi	Trịnh Thị Duy Hiền (Primary responsibility and cc Nguyễn Bùi Châu Nhi in the email)
4	WPO@saobacdau.vn	Receiving when the whistleblower needs protection	Quality Executive - Thái Thị Thanh Hoa	Quality Executive - Thái Thị Thanh Hoa	Thái Thị Thanh Hoa

QI:

No.	Email/ link	Function of each email	Accounts receive email	Accounts have right to use the according email to send feedback/reply mail	Responsibility for Redirecting Misrouted Information
1	Compliance-CMS@qi.com.vn http://cmsreport.qi.com.vn	Receiving cases of reportable behaviors (actual or suspected violations)	1. Chairman SBD Corp. – BoD- Nguyễn Đức Quang - quangnd@saobacdau.vn 2. Chairman QI - Head of Governance Body CMS- Đỗ Văn Hào - haodv@saobacdau.vn 3. General Director - Vũ Hồng Dương 4. Legal – Đặng Thanh Thảo 5. QMC Executive – Nguyễn Thị Hoa Minh	1. Legal QI - Đặng Thanh Thảo 2. QMC Executive – Nguyễn Thị Hoa Minh	Đặng Thanh Thảo (Primary responsibility and cc Nguyễn Thị Hoa Minh in the email)
2	Complaint@ qi.com.vn	Receiving employee complaints.	1. Legal – Đặng Thanh Thảo	QMC Executive – Nguyễn Thị Hoa Minh	Đặng Thanh Thảo (Primary responsibility

			2. Member of Senior Management - Vũ Hồng Dương 3. QMC Executive – Nguyễn Thị Hoa Minh		and cc Nguyễn Thị Hoa Minh in the email)
3	Question-CMS @ qi.com.vn	Receiving inquiries/consultations regarding CMS policies and regulations	1. Legal – Đặng Thanh Thảo 2. Member of Senior Management - Vũ Hồng Dương 3. QMC Executive – Nguyễn Thị Hoa Minh	1. Legal – Đặng Thanh Thảo 2. QMC Executive – Nguyễn Thị Hoa Minh	Đặng Thanh Thảo (Primary responsibility and cc Nguyễn Thị Hoa Minh in the email)
4	WPO@ qi.com.vn	Receiving when the whistleblower needs protection	Deputy General Director - Diệp Chí Dũng	Deputy General Director - Diệp Chí Dũng	Diệp Chí Dũng