

HO CHI MINH CITY SECURITIES CORPORATION



CODE OF CONDUCT

Host	Nguyen Linh Lan – MD - Head of HR
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Compose	Nguyen Thi Chanh Kim – TMOD Manager Nguyen Thi My Linh – Senior Internal Control & Compliances Executive
Control	Bui Thi Ngoc Thao – Senior Internal Control & Compliance Manager Nguyen Thi Xuan Dung – Senior Legal Manager
Approve	Trinh Hoai Giang – CEO

DOCUMENT CHANGES HISTORY

Issued	Date	Document name	Reason for changing
1	20/02/2012	Code of Conduct	
2	09/08/2013	Code of Conduct & Compliance (Code of Ethics)	
3	06/08/2019	Code of Ethics	
4	01/04/2020	Code of Conduct	Replaces 2019 Code of Ethics
5	20/06/2021	Quy Tắc Ứng Xử và Đạo Đức Nghề Nghiệp	Changes and updates in accordance with the Law on Securities No. 54/2019/QH14 issued on November 26, 2019, and applied from January 1, 2021

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1. Purposes

- 1.1. This Code of Conduct (Code) is designed to:
 - 1.1.1. Maintain standards of conduct for all HSC members.
 - 1.1.2. Ensure compliance with legal requirements, especially those of Vietnamese regulatory authorities;
 - 1.1.3. Prevent acts that may lead to conflicts of interest in the course of performing the Company's operations; and
 - 1.1.4. Increase professional pride among HSC members.
- 1.2. The provisions outlined in this Code are paramount to all members of HSC and are HSC's official commitment to Shareholders, Customers, and the Community.

2. Objects & Scope of Application

- 2.1. This rule applies to all HSC members, including members of the Board of Directors, Executive Board, managers, and all officers and employees working under contract with HSC in any form (Labor contract, Consulting contract, Probation contract, Internship, Collaborator, ...).

3. Interpretation of Terms

In this Policy, the following terms shall be understood as below:

- 3.1. **“Company” or “HSC”**: Ho Chi Minh City Securities Corporation
- 3.2. **“Code”**: Code of Conduct
- 3.3. **“Code of Ethics”** is understood as the standards of behavior, manners, and conduct in the course of business such as honesty, prudence, professionalism, compliance with the law, etc. for the securities business.
- 3.4. **“HSC members”**: includes members of the Board of Directors, managers, and all other officers and employees who have signed contracts with HSC in any form: official labor contract, probation contract, apprenticeship, or any other form.
- 3.5. **“HSC Broker Member”**: includes managers and brokers who have signed contracts with HSC in any form: formal employment contract, probationary period, apprenticeship, or any other form.
- 3.6. **“Related person”**: means a person who has a family relationship with an HSC member, including biological parents (or adoptive parents); father/mother-in-law; spouse, natural children (or adopted children); spouse's biological brothers/sisters (or half-siblings, or adoptive brothers/sisters); son-in-law, daughter-in-law; or spouse's brothers/sisters-in-law.
- 3.7. **“Internal information”**: is information relating to public companies, listed organizations, trading registration organizations, public funds, public securities investment companies that have not been disclosed but if disclosed, the announcement can greatly affect the price of this institution's securities.

- 3.8. **“Individual transaction”**: is a securities transaction for an individual's account or the account of a person related to that individual, regardless of which securities company this account is opened at.
- 3.9. **“Gifts”**: assets expressed in the form of money, kind, valuable papers, property rights, or other forms of material value such as the right to buy stocks, bonds, fund certificates, ... or vacation trips, sightseeing.
- 3.10. **“Customer”**: organizations and individuals that have been or are using or are in the process of preparing to enter into a contract to use HSC's products and services.
- 3.11. **“Confidential information”**: information that has not been publicly disclosed in the media (press, television), internet and is not known to the public, including but not limited to financial information, business know-how, technology, documents, forms, salary/bonus payments, labor contracts, other records, documents, and information related to HSC's operations, customers, or members.
- 3.12. **“Security practitioner”**: a person who has been certified securities practice by the State Securities Commission of Vietnam and works in the departments of securities brokerage, securities trading, securities underwriting, and investment consulting under the labor contract at HSC.
- 3.13. **“Customer related person”**: an individual or organization related to HSC's Client under the current Law on Enterprises and Law on Securities.
- 3.14. **“Conflict of Interest”**: a situation that occurs when the personal interests of HSC members are likely to conflict with the interests of HSC and/or the Client.

4. Relating responsibilities

4.1. Risk Management & Internal Control Department

- 4.1.1. Advise on compliance and handling violations of this Code.

4.2. Human Resources Department

- 4.2.1. Train and guide all employees to understand this Code.
- 4.2.2. Monitor the compliance and implementation of this Code of all HSC employees and members.

4.3. Heads of Divisions/ Departments/ Teams

- 4.3.1. Instruct and supervise employees under the chain of command in the compliance and implementation of this Code.

4.4. HSC Members

- 4.4.1. Read, understand, comply with and implement this Code, labor rules, internal regulations (rules, regulations, procedures) as well as legal regulations during the working time at HSC.

- 4.4.2. Fully participate in training courses on the law, trading system, new types of securities organized by the State Securities Commission of Vietnam, the Stock Exchange.

5. Core values & Code of ethics of HSC members

5.1. Integrity

- 5.1.1. HSC members act with integrity in every business decision and daily operation.
- 5.1.2. HSC members act with integrity, competence, prudence, respect, and ethics towards the Company, Clients, and colleagues.

5.2. Dedication

- 5.2.1. HSC members work diligently to provide the best services and exceed the expectations of the Clients and the Company.
- 5.2.2. HSC members do their jobs and encourage colleagues to do their work professionally and ethically.

5.3. Professionalism

- 5.3.1. HSC members are constantly creating, learning, and cultivating knowledge to improve their capacity to contribute to building HSC into a leading company in the industry.
- 5.3.2. HSC members put the standards of professional integrity, the interests of the Company, and the interests of the Client above personal interests.

5.4. Positivity

- 5.4.1. HSC members show a positive and respectful spirit when sharing and interacting with those around them.
- 5.4.2. HSC members maintain and improve professional capacity, support to improve the capacity of colleagues.

5.5. Partnership

- 5.5.1. HSC members build cooperative relationships based on trust, empathy, and mutual support.
- 5.5.2. HSC members give due care and use their professional skills to the best in carrying out assigned tasks.

6. Responsibility & behavior with HSC

6.1. Abuse of resources/ power

- 6.1.1. HSC members are not allowed to use assets, tools, and work facilities provided or allocated by HSC such as computers, telephones, printers, fax machines, credit cards, taxi cards, etc. for personal purposes.
- 6.1.2. HSC members must comply with working hours, must not use the excuse of going on business trips/ meeting with Clients to work privately during working time, and must register for vacation/ sick leave or other leaves according to HSC's regulations.

- 6.1.3. HSC members are not allowed to use computers, the Internet (wifi, LAN network), HSC systems to log in to invasive or depraved websites or chatting websites, social networking sites, or other websites that do not serve for working purposes during working time. HSC members must ensure the using time of the Internet while working and HSC's information system for personal purposes to a minimum.
- 6.1.4. HSC members must not suggest, request, or take advantage of their positions, powers as well as other advantages gained from working positions at HSC to benefit themselves or related persons through acts such as: receive remuneration, profits, commissions, bonuses, privileges, discounts, priority in purchasing properties/ products or other gifts/ material benefits from partners, suppliers, Clients, except for fee and remuneration requirements under HSC's regulations and the cases mentioned in Article 8.5.2.
- 6.1.5. HSC members absolutely must not use information, images, logos, names, and reputations of HSC to perform acts and work of brokerage, marketing, receiving deposits, receiving payments, commission for the provision of services that are not within the business scope of HSC and/or are not permitted by applicable law. If a member of HSC unilaterally or colludes to market and provides HSC's Clients with products and services that have not been permitted by the Law, that member will have to take full responsibility before the Law.
- 6.1.6. HSC members must not perform acts beyond the scope of HSC's power of authorization. Only employees authorized by HSC can review and sign contracts/ documents on behalf of HSC. If employees are unsure of their authority, they should immediately contact the Legal/ Internal Control Department for clarification.
- 6.1.7. HSC members are not allowed to use internal information to buy or sell securities for themselves, related persons, or others; disclose, provide internal information or advise others to buy or sell securities based on internal information.

6.2. Falsify and forge information

- 6.2.1. HSC members are not allowed to provide information to partners, clients, suppliers, or other individuals and organizations in a misleading/ fake manner, affecting the image and reputation of the Company.
- 6.2.2. HSC members must not forge signatures of superiors, colleagues or forge documents/ reports or modify any Company documents; print or circulate any advertisements or publications related to the Company or Company activities without the prior written consent of the Company.
- 6.2.3. HSC members must not forge Clients' signatures on all documents, transaction documents with HSC, or declare Client information untruthfully.
- 6.2.4. HSC members must not change products or create securities products and services without the Company's written consent; collude with other securities brokers or unilaterally market and provide HSC's Clients with products and services not yet permitted by Law and/or HSC.

- 6.2.5. HSC members must not create an artificial market and also must not engage in arrangements with others or have an interest in any action that is detrimental to the interests of the Client, leading to an imbalance and healthy of the market.
- 6.2.6. HSC members must not directly or indirectly commit fraud, cheating, forge documents, create false information, or publish false information or conceal information or omit necessary information which causes serious misunderstanding, affecting the activities of offering, listing, trading, investing in securities, and providing services on securities.

6.3. Dealing with Media

- 6.3.1. HSC members are not allowed to appear on any mass media on behalf of the Company to contact, explain, speak, write articles, provide information on radio, television, social networks, or using the name of HSC to organize conferences, seminars for Clients (investors), and securities forums without the consent of the Company.
- 6.3.2. HSC members are not allowed to send excessive emails expressing opinions, questions, problems in internal communication as well as communication with Clients; send directly to the Board of Directors, Board of Management, Board of Supervisors; distribute e-mails for personal gains, inciting the collective, etc., adversely affecting the working environment, image and reputation of the Company.
- 6.3.3. HSC members are not allowed to use HSC's email address to send potentially damaging, infringing, or illegal emails. This includes sending materials such as depraved pictures and videos.
- 6.3.4. HSC members must not spread false rumors, provide false information to the public to manipulate securities prices.

6.4. Conduct in the workplace and among HSC members

- 6.4.1. HSC members must not harass, insult or threaten related to dignity, gender, age, race, religion, and avoid slanderous acts that cause disunity within the Company and with people working in other companies and organizations.
- 6.4.2. HSC members are not allowed to use any means to entice existing HSC Clients who are being cared for by other HSC brokerage members to become their own Clients or their group Clients, leading to internal disunity or creating a bad image of the Company in front of Clients.

7. Responsibility & behavior with Clients**7.1. Protect Clients' interest**

- 7.1.1. HSC members have a responsibility to act with reasonable care, act in the interests of the Client, and put the interests of the Client above his own personal interests.
- 7.1.2. HSC members should be equipped with the best knowledge and information to promptly inform the Client about their interest and/or risks concerning dividends, bonus shares, stock rights, and any other interest related to securities to maximize the interests of the Client.

- 7.1.3. HSC members must not provide false, fraudulent, or misleading information to the Client. HSC members must clearly explain the purpose and meaning of each relevant document, must not make Client confuse, misunderstand or do not clearly understand the documents, and sign them for personal gains.
- 7.1.4. HSC members must not instigate, provoke, disrupt, offend or have other similar behaviors towards the Client, affecting the Client's interests.

7.2. Fairness to Clients

- 7.2.1. HSC members must treat all Clients fairly and objectively when providing services.
- 7.2.2. HSC members are only allowed to execute the Client's trading order when the order contains complete and accurate information about the Client, transaction date, order receiving time, stock code, method, order type, quantity, and transaction prices. Prioritize execution of Client's orders in the order of receipt time.
- 7.2.3. HSC members who place Clients' orders may not buy or sell the same securities for themselves at a price equal to or better than the Clients' price before the Clients' orders are executed.
- 7.2.4. HSC members must notify the Client when HSC or HSC member is a counterparty in an agreed transaction with the Client.
- 7.2.5. HSC members must not recommend Clients participate in securities transactions with too much frequency or quantity (unusually high frequency or quantity) to generate commissions and transaction fees.

7.3. Entice Clients

- 7.3.1. HSC members must not provide false information to entice Clients to buy and sell a certain type of securities or to manipulate the price of such securities.
- 7.3.2. HSC members may not advertise, claim that their content, performance, or methods of securities analysis are of higher value than those of other securities companies.
- 7.3.3. HSC members are not allowed to give opinions on the increase or decrease of securities prices without grounds to entice customers to participate in trading.

7.4. Abuse of Client account

- 7.4.1. HSC members may not use the Client's name or account to register and trade securities for individuals.
- 7.4.2. HSC members must not infringe on the Client's assets, rights, and other interests, nor decide to invest in securities on behalf of the Client or trade, receive and withdraw money on the Client's account.
- 7.4.3. HSC members are not allowed to receive orders and payment transactions from people other than the account holder's name without the account holder's written authorization.

- 7.4.4. HSC members are not allowed to receive authorization from the Client in securities trading, must not deposit money into the Client's securities account at HSC on behalf of Client, nor abuse their trust to appropriate Client's assets.

7.5. Profit commitment

- 7.5.1. HSC members may not guarantee an expected rate of profit, negotiate or offer a specific level of profit, or share profits or losses with the Client to entice the Client to participate in trading, except financial investment products with fixed income. Based on the best information that HSC members themselves learn and/or provided by the analysis department; when advising and recommending to the Client, HSC members should clearly tell the Client that the final decision came as the Client.

7.6. Manipulating, cheating

- 7.6.1. HSC members may not buy/ sell or perform transactions for a Client that HSC members know this Client has not fulfilled their commitment to another partner.
- 7.6.2. HSC members must not participate in transactions that are manipulative, fraudulent, misleading, or deceptive, creating rumors that distort the market balance or benefit individuals, except when HSC members place orders at the request of the Client, but in professional experience, they are not able to realize that the Client's behavior is illegal.

8. Conflict of interest, conflict of interest reporting, gift**8.1. Working/ Collaborating with other organizations**

- 8.1.1. HSC members are not allowed to simultaneously work and manage securities trading accounts (in any form) for other securities companies, securities investment fund management companies, branches of securities companies, and foreign fund management companies in Vietnam, securities investment companies.
- 8.1.2. HSC members cannot simultaneously work for another organization that has an ownership relationship with HSC.
- 8.1.3. HSC members cannot simultaneously hold the Director/General Director position of an organization offering securities to the public or a listed organization.
- 8.1.4. HSC member does not directly or indirectly work for, support, or advise HSC competitors, or establish or acquire a business that is currently competing with, or maybe considered to compete with, the business of HSC. business of HSC or assist, advise or participate in the establishment or acquisition of such competing business as an individual.
- 8.1.5. HSC members are not allowed to advise, recommend or introduce Client to use services of other securities companies (except for products and services that HSC does not provide).
- 8.1.6. HSC members are only allowed to open their own securities trading accounts at HSC.
- 8.1.7. HSC members are not allowed to conduct securities transactions for themselves/ related persons or Clients at other securities companies.

8.2. Participate in consultation/ decision making

- 8.2.1. HSC members who themselves or their related persons have a conflict of interest with HSC are not allowed to participate in HSC's decision-making process related to transactions with conflicts of interest, nor are they allowed to participate in business activities or transactions that may create a conflict of interest with HSC.
- 8.2.2. HSC members are not allowed to participate in activities and/or debates in groups, organizations, forums, public places that have the potential to cause conflicts of interest with the Client and/or HSC and/or affect the reputation of HSC.

8.3. Transactions/ agreements that cause a conflict of interest

- 8.3.1. HSC members are not allowed to advise customers to buy - sell and sell - buy stocks/ or securities transactions held by themselves, related persons, and/or other Clients for their own benefit, related persons and/or other Client intentionally.
- 8.3.2. HSC members are not allowed to make tacit agreements with Clients and HSC's partners to seek benefits for individuals or related persons, or affect/potentially affect the interests of HSC and the Client.
- 8.3.3. HSC members may not directly or through related persons participate in transactions with conflicts of interest. HSC members are not allowed to trade for themselves and/or their related persons for securities in which they are participants in investment proposals, investment decisions, investment management, or conduct transactions for HSC at the same period.
- 8.3.4. HSC members are not allowed to switch Clients to each other for personal gain (to receive higher commissions and bonuses)

8.4. Use of internal information

- 8.4.1. HSC members must not use confidential information (that information can be used for securities trading purposes) that they know due to their job position to trade for individuals and related people or provide others. HSC members are not allowed to use internal information to buy or sell securities for themselves or for others.
- 8.4.2. HSC members are not allowed to conduct pre-emptive transactions (buying or selling before an expected transaction of HSC). Specifically, HSC members must not:
 - a. Buy securities when they know the intention of HSC (or Funds managed by HSC) to purchase such securities;
 - b. Sell securities when they know the intention of HSC to sell the security;
 - c. Buy or sell securities based on the results of research, evaluation, and analysis of that security code, based on using HSC's data and information system which the results of research, evaluation, and analysis have not been publicly announced;
 - d. Buy or sell securities of Client, HSC's partners in transactions in which HSC is a related party, including but not limited to the role of buyer, seller, consultant, analyst/ assessor/evaluator, broker.

- 8.4.3. HSC members must not disclose, provide internal information or advise others to buy or sell securities based on internal information that has not been publicly announced.
- 8.4.4. Within twenty-four (24) months from the date of termination of the Labor Contract for any reason, HSC Members must not:
 - a. Work for, assist, or advise former or current HSC Clients;
 - b. Advocate, solicit, or take away any past, current or potential Clients of HSC; and/or
 - c. Whether directly or indirectly, through the intermediary of any business that HSC members may have an interest (senior executive, company director, member of board of management/ board of director, shareholders, members, employees, owners, or otherwise), hire or seek to employ any person who is currently an employee of HSC or has been employed at any time within one year before the employment termination with HSC.

8.5. Report conflicts of interest

- 8.5.1. HSC members are obliged to declare conflicts of interest when they first join HSC, annually, and when any situation arises that leads to the occurrence or possibility of a conflict of interest according to the form *HR-QTUX-BM02. Declaration of Conflicting Interest Form*.
- 8.5.2. HSC members are obliged to declare gifts/material benefits (remunerations, profits, commissions, bonuses) to the Human Resources Department according to the form *HR-QTUX-BM03. Gifts Declaration Form* except for the following cases:
 - a. Clients' gift is worth less than VND 1 million.
 - b. Meals and/or suitable entertainment in the client relationship.
 - c. Receiving gifts from family or people who have no business relationship with HSC.
 - d. Receiving gifts should not affect the objectivity of HSC members or encourage them to act against the interests of HSC.
 - e. Receiving gifts should not raise questions or complaints about bias, favoritism, or inadequacy.
 - f. Receiving gifts shows respect, courtesy, or sociability.

9. Information security

9.1. Definition of Confidential Information

- 9.1.1. Information owned or of a confidential nature is understood as confidential by the Company (hereinafter referred to as "Confidential Information"), including but not limited to the following:
 - a. HSC assets/information: Trade secrets, business secrets, business plans, information/portfolios, future projects, marketing plans, technical documents/information, source code, software system, financial situation, research

and development, market analysis, records/documents/contracts with clients/partners, list/client information, HSC policies/regulations/ processes...

- b. Client information: personal/organizational information, details of money/stock transactions, financial situation, etc.
- c. Employee information: performance, salary/bonus, financial benefits, etc.
- d. Any information, if disclosed, will affect the Company's operations or cause a lawsuit/dispute which causes damage to the Company.

9.1.2. Confidential Information can exist in any form, including paper, hardcopy, cards, microfilm, or microfiche, magnetic tapes, floppy disks, information in computer files, verbal and other messengers.

9.2. Prohibited activities

9.2.1. HSC Members understand that Confidential Information is vital to the business success of HSC and/or the Client. At all times, during or after the termination of an employment relationship with HSC, HSC members must not disclose, use, retain or bring outside HSC any Confidential Information, whether created by HSC members or not, except:

- a. Confidential Information is used to perform that member's work at HSC and is approved by the line supervisors in writing/email; or
- b. Such Confidential Information has become publicly known without disclosure by the HSC Member.

9.2.2. HSC members are not allowed to disclose, discuss the contents of trading orders, details of investments, or Client's confidential information that the member obtains from performing transactions for the Client, or HSC's business relationship, or from HSC's information system unless it is required to be disclosed or provided at the request of a Competent Authority.

9.2.3. HSC members are strictly prohibited from illegally collecting, sending information outside HSC/ sending to third parties and/or copying in any way, including but not limited to writing, documenting, computer screen copy, as well as backup to a personal storage device of confidential information and other information (whether such information is protected or likely to be protected as trade secrets and/or intellectual property).

9.3. Return confidential information

9.3.1. Upon termination of the Labor Contract, HSC Member must hand over to the Company all confidential information, regardless of the form of confidential information maintained.

9.4. Violation of confidentiality obligations

9.4.1. HSC Member's obligation to keep the confidential information as provided in Articles 9.2 and 9.3 will continue to remain in effect after the HSC Member's employment relationship (in any form) ends with the Company.

9.4.2. The violation of confidentiality obligation under Articles 9.2 and 9.3 may be the basis for

applying labor discipline and compensation for damages/losses suffered by HSC as a result of the violation. At the same time, HSC Members who violate the confidentiality obligations as prescribed in Articles 9.2 and 9.3 are also subject to civil liabilities following the law before HSC, Clients, and relevant third parties and/or criminal liability under current Law.

10. Handling violations

10.1. HSC members who violate the provisions of this Code will be disciplined according to the HSC's Labor Regulations but not contrary to the labor discipline provisions of the Labor Code at that time and depending on the circumstances and extent of the violation, including:

- 10.1.1. Written reprimand: applies to minor violations, affecting only within HSC, but not directly or indirectly, to Clients and shareholders.
- 10.1.2. Extension of salary increase period not exceeding 06 months or dismissal: applies to serious violations affecting internal operations without directly affecting Clients and shareholders.
- 10.1.3. Dismissal: applies to violations of the law; serious violations affecting business activities; HSC brand image and directly affect Clients and shareholders.

10.2. Particularly for cases of violation of conflict of interest, in addition to the forms of labor discipline mentioned in Article 10.1, HSC members will have to compensate HSC/ Clients damages (if any).

11. Report misconduct

- 11.1.** HSC members can ask for advice on matters related to the Code of Conduct at the Human Resources Department; Legal Department or Internal Control Department.
- 11.2.** Misconduct includes serious violations of rules, regulations, or business principles, unethical acts, criminal or civil crimes, harm to individuals / Clients and/or company and the intentional concealment of misconduct. HSC members must report ongoing or recent issues unless past issues continue to have an impact on the present or have just been discovered and are important matters of business to HSC.
- 11.3.** All reports/ denunciations related to violations of this Code may be sent via email to the following address: kiemsoattuanthu@hsc.com.vn. The reports/ denunciations will be kept confidential and the Departments of Human Resources, Legal, and Internal Control will conduct information verification and take appropriate handling measures.

12. Effective and Implementation

- 12.1.** This Code takes effect from June 20th, 2021, and replaces the Code of Conduct promulgated on April 1st, 2020.
- 12.2.** Matters that have not been mentioned in this Policy will be implemented in accordance with relevant laws and other HSC regulations. When there are any contents in this Policy that are contrary to the provisions of law, such contents will be automatically invalid.

- 12.3.** The amendment and supplement to this Policy are decided by the CEO. Heads of Divisions/ Departments/ Teams, employees, and related individuals are responsible for the implementation of this Policy.
- 12.4.** Each HSC member is responsible for signing a confirmation to read, understood, and comply with the provisions of this Code on the form *HR-QTUX-BM01. Commitment – Confirmed to read, understand, and comply with the Code of Conduct* and return it to the Human Resources Department for storage.

13. Attached forms

- 13.1.** HR-QTUX-BM01. Commitment – Confirmed to read, understand, and comply with the Code of Conduct
- 13.2.** HR-QTUX-BM02. Declaration of Conflicting Interest Form
- 13.3.** HR-QTUX-BM03. Gifts Declaration Form

14. References

- 14.1.** Legal documents: Law on Securities and current specialized legal documents; Labor Code.
- 14.2.** Relevant internal documents: Charter of organization and operation of the Company and Labor Regulation of the Company.

June 20th, 2021

	[Họ tên]	[Chữ ký]
Soạn thảo	Nguyễn Thị Chánh Kim – TMOD Manager	 
	Nguyễn Thị Minh Trang – Senior OD Executive	
Chủ trì chính sách	Nguyễn Linh Lan – MD - Head of HR	
Thống nhất		
Kiểm soát	Bùi Thị Ngọc Thảo – Senior Internal Control & Compliance Manager	 
	Nguyễn Thị Xuân Dung – Senior Legal Manager	
Phê duyệt ban hành	Trịnh Hoài Giang – CEO	 



CODE OF CONDUCT

HR-QTUX-BM01.

SOCIALIST REPUBLIC OF VIETNAM
Independence - Freedom - Happiness

COMMITMENT

CONFIRMED TO READ, UNDERSTAND AND COMPLY WITH THE CODE OF CONDUCT

To: HCMC Securities Corporation

Full name	
Position	
Division/ Department	
Employee ID	
Line Manager	

By signing this document, I acknowledge that I have read, understood, and committed to comply with the provisions outlined in the HSC Code of Conduct.

I undertake all responsibility if there is any violation of the provisions of the HSC Code of Conduct .

....., *date*

Confirmer

(Sign & write full name)

SOCIALIST REPUBLIC OF VIETNAM
Independence - Freedom - Happiness

DECLARATION OF CONFLICTING INTEREST FORM

To: HCMC Securities Corporation

Full name	
Position	
Division/ Department	
Employee ID	
Line Manager	

I. Declaration of Interest:

NO	CRITERIA	DECLARATION DETAILS
1	Securities trading account (opened at HSC and/or other Securities Companies)	
2	Information on securities transactions in the previous period on an account opened at a securities company	
3	Information about job position/ cooperation/ investment with other organizations (business name, title/ role, number/ ownership rate)	
	<i>Securities company, fund management company</i>	
	<i>Organizations with an ownership relationship with HSC</i>	
	<i>Organizations offering securities to the public or listing organizations</i>	
4	Transactions that may cause conflicts of interest with HSC (if any)	
5	Is there a transaction entrustment through someone else's account?	

6	Information on other matters that may give rise to a conflict of interest with HSC	
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II. Information about the person involved

NO	FULL NAME	RELATIONSHIP	PERSONAL INFORMATION	SECURITIES TRADING ACCOUNT

I commit to:

- Strictly comply with and implement the provisions of the HSC Code of Conduct.
- The information declared above is complete and true. In case there is any change in the declared information, I will make additional declarations in a timely manner.

....., date

Declarant

(Sign & write full name)

Note:

If an employee is uncertain about a potential conflict of interest, please follow these steps:

- *Employees must notify the direct supervisor of the “financial interest” and potential conflict in writing.*
- *Direct supervisors must determine if there is a conflict of interest. A conflict of interest exists if a) the decision or transaction could materially affect the value of the “financial interest”, or b) the employee's continued participation in the decision or transaction may result in inappropriate action.*
- *Direct supervisors must document in writing whether a conflict of interest exists and must obtain written consent from another appropriate decision-maker.*
- *If direct supervisors determine that there is a conflict of interest, the employee must be excluded from participating in the decision or transaction, or adopt other effective means that will prevent the conflict.*

HR-QTUX-BM03

SOCIALIST REPUBLIC OF VIETNAM
Independence - Freedom - Happiness

GIFTS DECLARATION FORM

To: HCMC Securities Corporation

Employee		Division/ Department	
Position		Employee ID	

DETAILS

NO.	CRITERIA	DETAIL
1	Gifts receive day	
2	Gift's description	
3	The estimated value of the gift	
4	Presenter	
5	The relationship of the presenter and the HSC members	
6	Reasons for receiving or refusing gifts from HSC members	
7	Other notes (if any)	
8	Employee's confirmation signature	
9	Line manager's confirmation	
10	Confirmation of Head of Division/ Department	

....., date

Confirmer

(Sign & write full name)