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**Ho Chi Minh City Securities Corporation**



**INFORMATION DISCLOSURE  
REGULATIONS**



Policy Owner	Le Anh Quan – Chief Communications Officer
Date of effective	October 27 <sup>th</sup> 2022
Reference No.	BOD/COM/POLICY/2022-4
Approver	Board of Directors

## 1. PURPOSES, OBJECTS & SCOPE OF APPLICATIONS

This Information Disclosure Regulation provides the unified application of information disclosure in Ho Chi Minh City Securities Corporation with aim to:

- Determine the responsibility of each Division/Department in providing information, avoiding violations of regulations on information disclosure.
- Ensure the consistency and accuracy of published information, in accordance with the requirements of the Regulatory bodies and the provisions of the Law.
- Ensure to disclose only the necessary information, excluding irrelevant information.
- Transparent publicize business activities, ensure the legitimate rights and interests of shareholders and customers.

## 2. DEFINITION

In this Regulation, the terms below are construed as follows:

- 2.1. Regulation : This Information Disclosure Regulation
- 2.2. Company (HSC) : Ho Chi Minh City Securities Corporation
- 2.3. SSC : State Securities Commission
- 2.4. VNX : Vietnam Stock Exchange
- 2.5. HOSE : Ho Chi Minh Stock Exchange
- 2.6. HNX : Ha Noi Stock Exchange
- 2.7. SE : Stock Exchange (including VNX, HOSE and HNX)
- 2.8. VSD : Vietnam Securities Depository
- 2.9. COM : Communications Division
- 2.10. GRC : Governance Risk Compliance Division
- 2.11. BOD : Board of Director
- 2.12. Insiders: include the Chairman and members of the Board of Directors, the Chief Executive Officer (CEO) and the legal representative, the Chairman and members of the Supervisory Board, members of the Internal Audit Committee, the Deputy CEO (if any), equivalent managing positions appointed by the General Meeting of Shareholders or the Board of Directors, Chief Financial Officer, Chief Accountant, Company Secretary, Person in charge of corporate governance, Person authorized to disclose information.



- 2.13. Majority shareholder: is shareholder owning at least 5% of voting stocks of company.
- 2.14. The responsible department: is the Division, Department or Unit that performs the task when information needs to be disclosed, including but not limited to the Finance and Accounting Division, Proprietary Investment & Treasury Division, Communications Division, Governance Risk Compliance Division and the Board of Directors.

### 3. PRINCIPLES OF INFORMATION DISCLOSURE

- 3.1. Information disclosure must be performed by the legal representative (CEO) or the person authorized to disclose information (Managing Director of COM). In case there is information to be disclosed but both of them are absent, the GRC Managing Director will replace to perform the information disclosure obligation.

The company must report on the appointment, authorization or change of persons performing information disclosure to the SSC and the SE within 24 hours from the date this action takes effect.

- 3.2. Information disclosure shall be concurrently reported to the SSC and the SE, where their securities are listed or registered for trading, on disclosed information. In case disclosed information includes personal information and disclosers do not agree to publicize such information, 02 documents shall be sent to SSC and SE, including 01 document containing sufficient personal information, and 01 document containing no personal information for the State Securities Commission or the Stock Exchange to disclose information.

Personal information includes Valid citizen identity card, identity card, military identity card or passport, contact address, permanent residence address, telephone number, fax number, email address, securities trading account number, securities depository account number, bank account number, trading code of a foreign investor or foreign-invested economic organization that holds over 50% of charter capital may be disclosed only when the concerned entity agrees.

- 3.3. Employees are not allowed to disclose or reveal information to outside including to partners, clients or media until the information is officially released.
- 3.4. Recipients of information disclosure:
  - a) All disclosures and reports must be sent to the SSC.
  - b) As a trading member, the company must disclose information and report to VNX (Members Management Department).
  - c) As a listed company at HOSE, the company must disclose information and report to HOSE (Listing Management Department).



- d) As a warrant issuer, the company must disclose information and report to HOSE (Warrants Listing Management Department).
  - e) As a depository member, the company must disclose information and report to VSD (Depository Department, Registration Department).
  - f) As a bond issuer, the company must disclose information and report to HNX (Corporate Bond Information Page)
- 3.5. Disclosure date is the date when information is disclosed through information disclosure media. Reporting date (on the information disclosure) is the date of faxing, or the date information is received on the information disclosure system of SSC and SE, or the date SSC and SE receive the hard copy of the report.
- 3.6. In case the obligation to disclose information arises on a holiday or public holiday as prescribed by Law, the company shall disclose information on the company's website and fulfill the obligation on the first working day after a holiday or public holiday.
- 3.7. The language of information disclosure must include Vietnamese and English; however, the English content is for reference only.
- 3.8. In case there is a change in the published information, the company must promptly and fully disclose the reason for the change and the sufficient changed content compared with the previous version, this must be sent to SSC and SE.
- 3.9. Extraordinary information disclosure must clearly state the event, cause, plan, and remedy (if any). When disclosing extraordinary information, the responsible department must send draft documents to GRC for review to ensure compliance with the objectives of information disclosure.
- 3.10. For periodic information disclosure, the responsible department must send GRC 8 hours before the time limit prescribed by law to upload information to the system of SSC and SE.
- 3.11. The master list of information disclosure (listing each type of information disclosure, responsible department, media, and time limit for information disclosure) attached to this Regulation is regularly reviewed and updated by GRC.

#### **4. DISCLOSURE MEDIA AND METHOD**

- 4.1. Information disclosure is publicized on the following disclosure media:
- a) Website of company (<https://www.hsc.com.vn>).
  - b) The information disclosure system of SSC;
  - c) Website of SE and VSD.



- d) Corporate bond information page of HNX (in case of bond issuance)
  - e) Other mass media as prescribed by law (printed and online newspapers, etc.).
- 4.2. Information disclosure and reports presented in the form of documents and electronic data must be digitally signed and sent simultaneously through the reporting and information disclosure system of SSC and SE.
- 4.3. The method of reporting and publishing on the information disclosure system of the SSC and SE shall be complied with their guidance.
- 4.4. Information disclosure on the company's website must meet the following requirements:
- a) Having contents on the business line and information to be publicly announced on the National Enterprise Registration Portal in accordance with the Law on Enterprises, and any change related to such contents.
  - b) Having a separate section on shareholder relations (investors), publicizing the company charter, information disclosure regulation, internal regulation on company administration, regulation on operation of the Board of Directors or Supervisory Board, prospectus (if any) and information which shall be disclosed regularly, extraordinarily, or as required.
  - c) Displaying the time when information is posted to ensure that investors may search and access data thereon.
  - d) Reporting to SSC, SE and publicizing the website address, as well as any changes related to this address within 03 working days from the date of completion of the website establishment or website address change.

COM is responsible for managing information disclosure on the company's website.

## **5. POSTPONEMENT OF INFORMATION DISCLOSURE**

- 5.1. In case the information disclosure is unable to performed on time due to force majeure reasons (natural disaster, fire, war, etc.), the company must report to SSC, SE on the postponement of information disclosure as soon as the event occurs, which clearly states the reason for the postponement; and publicize the postponement at the same time.
- 5.2. As soon as the force majeure event is remedied, the company shall adequately disclose information that could not be previously disclosed in accordance with law.

## 6. INFORMATION PRESERVATION AND STORAGE

- 6.1. Person in charge of corporate governance is responsible for setting up and managing the Information Disclosure Watch List, preserving, and keeping all original documents and electronic data disclosed in accordance with current Laws.
- 6.2. Regular information disclosure and information on the company's registration shall be stored in the forms of written documents (if any) and electronic data for at least 10 years. Such information shall be cached and accessible on the company's website for at least 5 years.
- 6.3. Extraordinary/On demand information disclosure or other activities shall be cached and accessible on company's website for at least 5 years.

## 7. RESPONSIBILITIES OF RELEVANT DEPARTMENTS

Department	Responsibilities
The responsible department	<ul style="list-style-type: none"> <li>- Take the main responsibility for the adequacy, accuracy, and timeliness of information disclosure as required by law.</li> <li>- Collect information, draft disclosure documents, coordinate with other departments such as GRC for reviewing/approving; and</li> <li>- Transfer the documents to GRC for timely posting on the Authorities systems and to COM for timely posting on the company's website.</li> <li>- Transfer the original documents to the Person in charge of corporate governance for preserving and keeping according to regulations.</li> </ul>
GRC	<ul style="list-style-type: none"> <li>- Receive disclosure documents from the responsible department and be responsible for fully and timely posting official documents to the systems of SSC and SE.</li> <li>- Review to ensure that only necessary information is properly and fully disclosed in case of extraordinary information disclosure, excluding irrelevant information.</li> </ul>
COM	<ul style="list-style-type: none"> <li>- Be responsible for fully posting information disclosure documents on the Company's website as soon as they are received (the delay may violate the disclosure deadline);</li> <li>- Ensure that extraordinary information must be approved by GRC (or sent out from GRC) before disclosing.</li> </ul>



## 8. INFORMATION DISCLOSURE PROCESS

Step	Task	Department	Description
1	Prepare disclosure documents & reports (if any)	The responsible department	Actively prepare the disclosure documents and perform the above responsibilities when there is periodic/extraordinary information to be disclosed.
2	Review disclosure documents/ reports	The Internal control and Compliance Department (GRC)	Review disclosure documents to ensure that only necessary information is properly and fully disclosed in case of extraordinary information disclosure, excluding irrelevant.
3	Edit (if any) and submit for approval	The responsible department	<ul style="list-style-type: none"> <li>- Edit the contents of the disclosure documents/ reports according to the request of the Internal control and Compliance Department.</li> <li>- Print and submit to sign disclosure documents/reports (Note: signing authority for each report is different).</li> <li>- Fill in the number of disclosure documents, copy as much as necessary, stamp the company seal at the Administration Department and scan.</li> <li>- Send 01 original documents/reports to the Person in charge of corporate governance for preserving and storing; the remaining originals and scanned copy (with full signature/ seal) to the Internal Control &amp; Compliance Department.</li> </ul>
4	Send/Submit disclosure documents/ reports	The Internal control and Compliance Department (GRC)	Send the originals by post and the scanned copy via email <a href="mailto:cbtt@hsc.com.vn">cbtt@hsc.com.vn</a> to Authorities or upload on their systems.
5	Upload on company's website	COM	Upload the entire documents (scanned with full signature/seal) on the company's website, monitor the mass media's re-publishing or the articles related to information disclosure content to promptly handle according to internal policies and procedures.

## 9. LEGAL BASIS

- Decree No. 155/2020/NĐ-CP dated 31<sup>st</sup> December 2020 detailing and guiding the implementation of a number of articles of the Law on Securities
- Decree No. 153/2020/NĐ-CP dated 31<sup>st</sup> December 2020 regulating private placement of corporate bonds and trading of privately placed corporate bonds in the domestic market and offering of corporate bonds to the international market
- Decree No. 65/2022/NĐ-CP dated 16<sup>th</sup> September 2020 amending, and supplementing a number of articles of Decree No. 153/2020/NĐ-CP
- Circular No. 96/2020/TT-BTC dated 16<sup>th</sup> November 2020 of the Ministry of Finance guiding the disclosure of information on the securities market
- Decision No. 21/QĐ-SGDVN dated 21<sup>st</sup> December 2021 promulgating regulations on information disclosure of Vietnam's Stock Exchange and its subsidiaries
- Other relevant regulations.

These regulations are subject to change, amendment, and replacement by authorities from time to time.

## 10. TERMS OF IMPLEMENTATION

This Regulation takes effect from October 27<sup>th</sup> 2022 after being approved by the Board of Directors and replaces all current regulations and processes on information disclosure.

Except for the case of reviewing and updating the master list of information disclosure as prescribed in Section 3.11, any amendment, supplement, or replacement of this Regulation shall take effect only after it is approved by the Board of Directors.

Approved

For and on behalf of the Board of Directors of Ho Chi Minh City Securities Corporation



Chairman: Johan Nyvene

Date: 27 October 2022