

Ho Chi Minh City Securities Corporation



CODE OF CONDUCT AND PROFESSIONAL ETHICS

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| Approved by | TRINH HOAI GIANG - CEO |
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Revision History

| Times issued | Date | Name of document | Reason for revision |
|--------------|------------|--|--|
| 1 | 20/02/2012 | Regulations of Professional Ethics | |
| 2 | 09/08/2013 | Ethics and Compliance Principles (Code of Professional Ethics) | |
| 3 | 06/08/2019 | Professional Ethics | |
| 4 | 01/04/2020 | Code of Conduct and Professional Ethics | Replace Professional Ethics version dated 06/08/2019 |

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1. Purpose

This Code of Conduct and Professional Ethics (referred to “**Code**”) is designed to:

- (i) Maintain standards of behavior for all HSC members,
- (ii) Ensure compliance with legal requirements, especially those of the Vietnam Regulatory Authorities,
- (iii) Prevent behaviors that may lead to conflict of interest in the implementation of Company business, and
- (iv) Strengthen professional pride in HSC members.

The regulations issued in this Code are crucial for all members of HSC also the official commitment of HSC to Shareholders, Customers and Community.

2. Subject and scope of application

This Code applies to all HSC members, including members of the Board of Directors, the Executive Board, managers and all officials and employees working under the contract with HSC in any forms (Labor contracts, Consulting contracts, Probationary contracts, Internships, Collaborators, etc).

3. Responsibilities of Departments

- 3.1. The Human Resources Department is responsible for training and guiding all staffs and supervising compliance, implementation this Code.
- 3.2. The Heads of Departments are responsible for guiding and supervising their subordinates in compliance and implementation this Code.
- 3.3. The Human Resources Department and Risk Management Department (Legislation and Internal Control) are responsible for supervising, consulting compliance and handling the violation of this Code.
- 3.4. Each HSC member is responsible for reading, understanding, complying and implementing this Code, labor regulations, internal regulations (statutes, regulations, procedures) as well as legal provisions during working time at HSC.
- 3.5. HSC member must participate fully in legal training courses, trading system and new types of securities held by the State Securities Commission and Stock Exchange.

4. Terminologies

In this Code, the words below are understood as follows:

- 4.1. “**Code**”: Code of Conduct and Professional Ethics.
- 4.2. “**Professional Ethics**” means the standards of behaviors, manners and conducts in the working process such as: honesty, prudence, professionalism, compliance with laws, etc which are regulated for the securities trading profession.
- 4.3. “**Company**” or “**HSC**”: Ho Chi Minh City Securities Corporation.

- 4.4. **“HSC members”**: Including members of Board of Directors, management officers and all officers, employees who have signed labor contract with HSC in any form: official, probationary, apprentice contract or any other form.
 - 4.5. **“HSC broker members”**: Including management officers and brokers who have signed labor contracts with HCS in any forms: official, probationary, apprentice contracts or any other forms.
 - 4.6. **“Related people”**: are people related to HSC members, including parents (or adoptive parents); parents-in-law; wife/husband; offspring (or adopted child); sibling (or half-brother, half-sister or foster-brother, foster-sister).
 - 4.7. **“Internal information”**: is information relating to public companies, listing organizations, trading registration organizations, companies of public securities investment, which has not been disclosed yet. If this type of information is disclosed, the securities price of these organizations will be seriously affected.
 - 4.8. **“Personal Trading”**: is securities trading for an individual’s account or or an account of a person related to that individual, regardless of securities company from which this account is opened.
 - 4.9. **“Gifts”**: The assets are presented in form of cash, objects, valuable papers, right to property or other forms of material values such as: stock options, bonds, fund certificates, etc or vacation trips.
 - 4.10. **“Customer”**: Organizations and individuals had already used or are using or are in the process of dealing to use HSC’s services.
 - 4.11. **“Security information”**: The information has not yet been published and disclosed to the public relating to operation (financial information, technology secret, information of systems, document, salary/bonus, labor contract, and related documents) of HSC, Customers or HSC members.
 - 4.12. **“Securities practitioner”**: The person has Securities practicing certificate, working in securities brokerage departments, selftrading, securities issuance guarantee, securities investment consultancy and this person had signed a labor contract with the securities company.
 - 4.13. **“People related to customers”**: Individuals or organizations having relationships with each other according to the Law on Enterprises in general and current Securities Law in particular.
 - 4.14. **“Conflict of interest”**: Situations where the personal interest of HSC members are likely to conflict with the interest of HSC and/or the Customers.
- 5. Core values and ethical code of HSC members**
- 5.1. **Integrity**
 - 5.1.1. HSC members bring integrity into each decision and daily business of the Company.
 - 5.1.2. HSC members act in accordance with standards of integrity, competence, prudence, respect and ethics with the Company, Customers and colleagues.

5.2. Dedication

- 5.2.1. HSC members work with the devoutness to provide the best services and exceed expectation of Customers and Company.
- 5.2.2. HSC members work and encourage their colleagues to work in a professional and ethical manner.

5.3. Professionalism

- 5.3.1. HSC members are constantly creative, continuously learn and cultivate their knowledge to improve capacity to contribute to build HSC become an industry leader.
- 5.3.2. HSC members set the standards of integrity of careers, the interests of Company and the interests of Customer on personal interest.

5.4. Positivity

- 5.4.1. HSC members show a positive spirit, respect when sharing, interacting with people around.
- 5.4.2. HSC members maintain and improve the professional competence and support their colleagues to improve the competency.

5.5. Partnership

- 5.5.1. HSC members build a partnership based on mutual trust, empathy and support.
- 5.5.2. HSC members take reasonable care and use the best possible professional skills when doing the assigned work.

6. Responsibility & conduct with HSC**6.1. Abuse of resources/ abuse of power**

- 6.1.1. HSC members are not allowed to use assets, tools, support facilities such as computers, phones, printers, fax machines, credit cards, taxi cards, etc. for personal purposes.
- 6.1.2. HSC members must comply with the working hours, not to take reasons for business travel/meeting customers to use working time for personal work, simultaneously, registration for leave of absence/sick leave or other leave is required in accordance with HSC regulations.
- 6.1.3. HSC members are not allowed to use the HSC system to log into websites that are depraved or chatting. HSC members must ensure that the time using the internet while working and using the HSC information system for personal purposes is at the lowest level.
- 6.1.4. HSC members are not allowed to suggest, request or take advantage of positions, powers or other advantages gained from their positions at HSC to benefit for individuals or related people (receive remuneration, profits, commissions, bonuses or other gifts/material benefits from partners, suppliers, customers), except for the fees and

remuneration requirements in accordance with the provisions of HSC and the cases referred to in the section 8.5.2.

6.1.5. HSC members absolutely must not use information, images, logos, name or reputation of HSC to conduct brokerage, marketing, receiving deposits, receiving payments, commissions for providing services that are not within HSC's business scope and/or not permitted by applicable law. In the event that HSC members unilaterally or collectively provide for customers of HSC with products and services not permitted by Law, such that member will take full responsibility before the Law.

6.1.6. HSC members must not perform acts that exceed the scope of authorization of HSC. Only authorized employees are allowed to review, sign contracts/documents on behalf of HSC. If the employee is unsure of the approval authority, immediately contact the Legislation /Internal Control Department for clarification.

6.2. Falsifying information

6.2.1. HSC members are not allowed to provide false/misleading information that affects the image and reputation of the Company.

6.2.2. HSC members are not allowed to forge signatures of superior, colleagues or forge documents/reports or modify any of the Company's documents, print or circulate any advertisements or publications related to the Company or its activities without the Company's written approval.

6.2.3. HSC members are not allowed to forge signatures of customer on all documents dealing with HSC or to declare customer information dishonestly.

6.2.4. HSC members are not allowed to change products or create securities products without the Company's written consent; to connive with brokers of other securities companies or to market, provide by themselves for customers of HSC with products and services not permitted by Law and/or HSC.

6.2.5. HSC members are not allowed to create artificial markets or to engage in arrangements with others or to have an interest in any actions that harm the interests of customers, resulting in an imbalance and a healthy environment of the market.

6.3. Conduct in the media

6.3.1. HSC members are not allowed to appear on any mass media on behalf of the Company to contact, explain, announce, issue statements, provide information on the Press, television or to use HSC's name to organize conferences, customer conferences (investors), and securities forums without the Company's consent.

6.3.2. HSC members are not allowed to send level-excess emails to express opinions, queries and problems in internal communication as well as communication with customers; send directly to the Board of Directors, Board of Supervisors; distributing e-mail messages for personal benefits, stimulating community, etc adversely affecting the working environment, the image and reputation of the Company.

6.3.3. HSC members are not allowed to use HSC email addresses to send emails that are in danger of causing damage, infringement or illegality. This includes sending materials such as depraved pictures.

6.4. Conduct at work and among HSC members

6.4.1. HSC members are not allowed to harass, offend human dignity or threaten about gender, age, race, religion, and at the same time avoid slanderous acts that cause loss of internal solidarity of the Company and with colleagues working in other companies and organizations.

6.4.2. HSC members may not use any means to entice existing customers of HSC who are being cared by other broker members at HSC to their group's customers, resulting in internal disunity or creating a negative image of the Company to customers.

7. Responsibility & Conduct with customers

7.1. Protection of customer interests

7.1.1. It is the duty of HSC members to act with due care, to act for the interests of customers and to place the interests of customers above the individual's interests.

7.1.2. HSC members should be equipped with the best possible knowledge and information to promptly inform their customers about rights and/or risks related to dividends, bonus stocks, stock option and any other rights related to securities to protect customers' interests.

7.1.3. HSC members may not provide false, misleading, or misleading information to customers. HSC members must clearly explain the purpose and meaning of each of the relevant documents, do not make customers confused, misunderstand or do not understand the documents and sign them for personal gain.

7.1.4. HSC members must not incite, provoke, disrupt, insult or otherwise behave against customers, affecting the interests of customers.

7.2. Equity for customers

7.2.1. HSC members must treat fairly and objectively with all customers when providing services to customers.

7.2.2. HSC members are only allowed to execute customer's trading orders when the order is complete and accurate, including customer information, trading date, stock code, method, order type, quantity and transaction price. Prioritizing the execution of Customer orders in the order of the time of order receiving.

7.2.3. HSC members who orders for the customer must not buy or sell with the same direction and type of securities for themselves at a price equal to or better than the customer's price before the customer's order is executed.

7.2.4. Members of HSC must notify the customers when HSC or they are a partner in a deal with the customers.

7.2.5. HSC members are not recommended the customers to engage in securities transactions with excessive frequency or quantity (unusually high frequency or volume) in order to generate commission fee.

7.3. Customers Enticement

7.3.1. HSC members must not conduct acts of providing false information to induce or entice customers to buy or sell a particular type of securities.

7.3.2. HSC members are not allowed to advertise, claim that value of their content, efficiency, or methods of analyzing securities are higher than other securities companies.

7.3.3. HSC members are not allowed to give any opinion on the increase or decrease of securities price without any basis to entice customers to participate in the transactions.

7.4. Abuse customer's accounts

7.4.1. HSC members are not allowed to use the customer's name or account to register transaction for themselves.

7.4.2. Members of HSC may not infringe upon property, rights and other interests of customers, nor decide to invest in securities on customer's behalf or arbitrarily trade, receive and withdraw money on customer's accounts.

7.4.3. HSC members must not receive orders, pay transactions with someone who is not the account holder name without owner's written authorization.

7.4.4. HSC members are not allowed to receive authorization from customers in securities transactions, do not on behalf of customer to deposit in customers' securities accounts at HSC, nor decide to invest in securities on behalf of customers.

7.5. Commitment to profits

7.5.1. HSC members are not allowed to guarantee a certain percentage of expected profits, agree or offer a specific level of profits, or share profits or losses with customers in order to entice customers to participate in transactions, except for the financial investment products with fixed income. Based on the best information that HSC members themselves find out and/or provided by the analyst team, HSC members when advising and recommending customers should clarify that the final decision is of the customers.

7.6. Manipulation, cheating

7.6.1. HSC members are not allowed to buy/sell or make transactions for customers when HSC members know they have not fulfilled their commitments to other partners.

7.6.2. HSC members are not allowed to engage in transactions that are manipulative, fraudulent, misleading or deceptive, creating rumors that distort market balance or benefiting individuals, except for cases where HSC members place orders at the request of the customers, but by their professional experience, the members who place orders do not have the ability to recognize the customer's behavior as illegal.

8. Conflicts of interest, reporting conflicts of interest, and gifts

8.1. Working/collaborating with other organizations

- 8.1.1. HSC members may not work simultaneously (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 may not concurrently work for other organizations with ownership relations with HSC
- 8.1.3. HSC members may not concurrently act as the Director/General Director of a public offering organization or a listed organization.
- 8.1.4. HSC members may not directly or indirectly work, support or advise HSC 's competitors or establish or repurchase a enterprise that is currently competing or can be considered competitive with HSC or assist, advise or engage in the establishment or acquisition of that competing enterprise as an individual.
- 8.1.5. HSC members are not allowed to advise, recommend or introduce customers to use services of other securities companies (except for service products which HSC does not provide).
- 8.1.6. HSC members may only open their own securities trading account at HSC.
- 8.1.7. HSC members are not allowed to make securities transactions for themselves/related people or customers at other securities companies.

8.2. Participating in consultation/ making decision

- 8.2.1. HSC members with conflicts of interest are not allowed to involve in the decision making process of HSC in relation to the transactions with conflicts of interest, nor may engage in business activities or transactions that may generate conflict of interest with HSC.
- 8.2.2. HSC members are not allowed to participate in activities and/or debate in groups, organizations, forums, public places that are in danger of conflicts of interest with customers and/or HSC and/or influence to the reputation of HSC.

8.3. Transactions/ Deals causing conflict of interest

- 8.3.1. HSC members are not allowed to advise customers to buy - sell at the same time with selling - buying stocks or securities transactions that individuals/related people and/or other customers are holding in order to benefit individuals/related people and/or other customers intentionally.
- 8.3.2. Members of HSC must not implicitly agree with Customers, partners of HSC to seek benefits for themselves (or related people), or influence/potentially affect the interests of HSC and Customers.
- 8.3.3. Members of HSC are not allowed to directly engage in, or through related people, transactions of conflict of interest. HSC members are not allowed to conduct

transactions for individuals and/or related people for securities whose these members are participating in investment proposals, investment decisions, investment managements, or making HSC transaction during the same time period.

8.3.4. HSC members are not allowed to exchange customers for personal gain (higher commission and bonuses).

8.4. Usage of internal information

8.4.1. HSC members are not allowed to use confidential information (that information can be used for securities trading purposes) that they know because of their job position to transact for themselves and related people or provide that information for 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 forward transactions (buying or selling transactions before a predetermined transaction of HSC. In particular, HSC Members must not:

- (i) Purchase a type of securities when that person knows the intention of HSC (or the Fund managed by HSC) to buy the securities;
- (ii) Sell a type of securities when that person knows the intention of HSC to sell the securities

8.4.3. HSC members are not allowed to disclose, provide internal information or advise others to buy and sell securities on the basis of undisclosed internal information.

8.4.4. Within twenty four (24) months from the date of the Labor Contract's termination for any reasons, HSC Members are not allowed to:

- (i) Work for, support or advise HSC's previous or existing Customers;
- (ii) Lobby, solicit or try to take away any past, present or potential HSC customers; and/or
- (iii) Whether directly or indirectly, through intermediaries of any businesses by which HSC members may benefit (as a senior executive, a company director, a member of management board/board of directors, a shareholder, a member, an employee, an owner or others), recruit or try to recruit any person who is currently employed by HSC or has been employed at any time within one year before the employment of that HSC member with HSC ends.

8.5. Report on conflict of interest

8.5.1. Members of HSC are obliged to report a conflict of interest upon joining HSC, and annually, and when arising any circumstances leads to the occurrence or possibility of a conflict of interest. The report must be in writing (form 2 - attached to this Code)

8.5.2. HSC members are obliged to declare gifts/material benefits (remuneration, profits, commissions, bonuses) to Human Resources (form 3 - attached to this Code), except the following cases as below:

- (i) Customer's gift is less than 1 million VND.

- (ii) Meals and/or entertainment activities appropriate in relation to the Customer.
- (iii) Receiving gifts from families or people who have no business relationship with HSC.
- (iv) The acceptance of gifts does not affect the objectivity of HSC Members or encourage the receiver to go against the interests of HSC.
- (v) The acceptance of gifts does not cause questions or complaints about bias, favor, or nonconformity.
- (vi) The acceptance of a gift shows respect, courtesy or harmony.

9. Information Security

9.1. Definition of Confidential Information

9.1.1. Owned information or secret information is understood as the Company's confidential subject (hereinafter referred to as “**Confidential Information**”), including but not limited to the following:

- HSC assets/information: Trade secrets, business plans, information/portfolios, future projects, marketing plans, technical documents/information, source code, software systems, financial status, research for development, market analysis, files/documents/contracts with customers or partners, lists/information of customers, policies/regulations/processes of HSC, etc.
- Customer information: individual information/organization information, details of money or securities transactions, financial situation, etc.
- Employee information: job performance, salary/bonus, financial benefits, etc.
- Any information if disclosed will affect the Company's operation or result in a law suit/dispute causing damages to the Company.

9.1.2. Such confidential information exists in any forms, including papers, prints, cards, video micro films, or microfiche, magnetic tapes, floppy disks, information saved in computer files, verbal and other news items.

9.2. Activities prohibited

9.2.1. Members of HSC understand that Confidential Information is critical to the success of HSC business and/or Customers. At all times, during or after the termination of employment relation with HSC, HSC Members must not disclose, use, retain or disclose any HSC's Confidential Information, whether it is caused by HSC Members or not, except:

- (i) Confidential Information is used to carry out the work of that Member at HSC and is approved by the direct superior in writing/email; or
- (ii) Such Confidential Information was widely known and not caused by the disclosure of HSC Members.

9.2.2. HSC members are not allowed to disclose, discuss the contents of trading orders, details of investments or confidential information of the Customer that members acquiring from conducting transactions for the Customer, or from HSC's business

relationship, or from HSC's information system, except when disclosing information or providing it as per request of competent governmental agencies.

9.2.3. Members of HSC are strictly prohibited from unauthorized collection, sending information out of HSC/sending it to third party and/or copying it in any forms, including but not limited to writing, documenting, printing computer's screen, as well as backing up to personal storage devices towards Confidential Information and other information (whether that information is protected or potentially protected as trading secrets and/or intellectual property or not).

9.3. Return of Confidential Information

At the end of the Labor Contract, HSC Members must hand over all Confidential Information, regardless of the forms/medium the Confidential Information is kept.

9.4. Violation of security obligations

Without prejudice to the civil and/or criminal responsibilities of HSC Member according to the applicable Laws, a breach of the obligation for information security prescribed in sections 9.2 and 9.3 above may become a basis to apply disciplinary methods and compensation for damages/losses which HSC incurs as a result of the HSC Member's violation.

9.5. Security obligations after termination of the Labor Contract

HSC Member's obligations to keep information confidential in accordance with sections 9.2 and 9.3 above will continue to be valid after the employment relationship (in any forms) of the HSC Member with the Company ends.

10. Handling of violations

10.1. Members of HSC who violate the provisions of this Code will be disciplined according to HSC's Labor Regulations but not contrary to the law of handling labor discipline of the Labor Code at that time and depending on the nature ,level of violations, including:

10.1.1. Reprimand in writing: applies to minor violations, only affect within HSC and does not directly or indirectly affect Customers and Shareholders.

10.1.2. Lengthen the time limit for salary increase not exceeding 06 months or dismiss: applies to serious violations which affect internal activities without affecting directly to customers and shareholders.

10.1.3. Dismiss: applies to law violations; serious violations affecting business activities; brand image of HSC and directly affect Customers and Shareholders

10.2. Particularly for cases of violations of conflicts of interest, in addition to the disciplinary methods mentioned in section 10.1 above, HSC Members will have to compensate for damages to HSC/Customer (if any).

11. Reports of misconducts

11.1. HSC members can seek advices on the issues related to the Code of Conduct and Professional Ethics at the Human Resources Department; Legal or Internal Control Unit.

11.2. Misconducts include serious violations of internal rules, business rules or principles, unethical acts, criminal offenses or civil law violations, which are harmful to individual/customers and/or the Company and knowingly concealing misconducts. HSC members are required to report current or recent problems unless past issues continue to affect the present or have just been discovered and they are important business matters for HSC.

11.3. All reports/accusations related to violations of this Code can be emailed to the following address: kiemsoattuanthu@hsc.com.vn. Reports/accusations will be kept confidential and the Human Resources Department, Legal Department, Internal Control Department will conduct to confirm the information as well as take appropriate measures.

12. Validity

12.1. This Code is valid from the date of issuance and replaces the Professional Ethics issued on August 6th, 2019.

12.2. Each HSC member is responsible for signing of having read, understood and complied with the provisions of this Code (form 1 – attached to this Code) and return it to Human Resources Department for storing.

13. Attached forms

13.1. Form 1: Commitment to comply with the Code of Conduct and Professional Ethics

13.2. Form 2: Conflict of interest declaration

13.3. Form 3: Gifts declaration

14. References

14.1. Legal documents: Securities Law and current specialized legal documents; Labor Code.

14.2. Relevant internal issued documents: Company's Charter of organization and operation and Company's Labor Regulations.

14.3. In case of inconsistencies between the Vietnamese version and the English version, the Vietnamese version will be the official version.

Date 17/03/2020



TRINH HOAI GIANG
GENERAL DIRECTOR

FORM 1. Commitment to comply with the Code of Conduct and Professional Ethics

SOCIALIST REPUBLIC OF VIETNAM

Independence - Freedom – Happiness

COMMITMENT FORM

*CONFIRMATION OF READING, UNDERSTANDING AND COMMITMENT TO COMPLIANCE WITH
CODE OF CONDUCT & PROFESSIONAL ETHICS*

Dear Ho Chi Minh Securities Joint Stock Company

| | |
|-------------|--|
| Name | |
| Title | |
| Division | |
| Employee ID | |
| Report to | |

By signing this document, I acknowledge that I have read, understood and commit to comply with the provisions of the HSC Code of Conduct and Professional Ethics.

I pledge to take all responsibility if there are any violations of the provisions of HSC's Code of Conduct and Professional Ethics.

....., date.....

Assertor

(Sign and write the full name)

FORM 2. Conflict of Interest Declaration

SOCIALIST REPUBLIC OF VIETNAM
Independence - Freedom – Happiness

CONFLICT OF INTEREST DECLARATION FORM

Dear Ho Chi Minh Securities Joint Stock Company

| | |
|-------------|--|
| Name | |
| Title | |
| Division | |
| Employee ID | |
| Report to | |

I. Contents of conflict of interest declaration:

| N ^o | CRITERIA | CONTENTS OF DECLARATION |
|----------------|---|-------------------------|
| 1 | Securities trading accounts (opened at HSC and/or another securities company) | |
| 2 | Information of securities transactions in the previous period on accounts opened at Securities company | |
| 3 | Information about job position/cooperation/investment with other organizations (business name, title/role, number/ownership rate) | |
| | <i>Securities companies, fund management companies</i> | |
| | <i>The organization has an ownership relationship with HSC</i> | |
| | <i>Organizations that offer securities to the public or listed organizations</i> | |
| 4 | Transactions that may cause conflicts of interest with HSC (if any) | |
| 5 | Whether to trust or trade through someone else's account | |
| 6 | Information on other issues that may cause conflicts of interest with HSC | |

POSITIVE INFLUENCE

II. Information about the person involved

| N° | NAME | RELATIONSHIP | PERSONAL INFORMATION | SECURITIES TRADING ACCOUNT |
|----|------|--------------|----------------------|----------------------------|
| | | | | |
| | | | | |
| | | | | |

I pledge:

- Comply with and carry out strictly the regulations of the Code of Conduct and Professional Ethics of HSC.

- The above declared information is sufficient and true. In case of any changes to the declared information mentioned above, I will make additional declarations promptly.

....., date.....

Declarants

(Sign and write the full name)

Notes:

If employees are not sure of potential conflicts of interest, follow these steps:

- *The employee must notify the direct supervisor of the "financial interest" and the potential conflict by text.*
- *The direct superior must determine whether there is a conflict of interest or not. A conflict of interest exists if a) that decision or transaction may materially affect the value of the "financial interest," or b) the employee's continued involvement in the decision or transaction may result in inappropriate action.*
- *The direct superior must record in writing whether a conflict of interest exists or not and must obtain the written consent of the person who makes other appropriate decisions.*
- *If the direct superior determines that is a conflict of interest, the employee must be excluded from participating in decision-making or trading, or accepting other effective solutions that will prevent such conflict.*

FORM 3: Gifts Declaration**SOCIALIST REPUBLIC OF VIETNAM**

Independence – Freedom – Happiness

GIFTS DECLARATION FORM

Dear Ho Chi Minh Securities Joint Stock Company

| | | | |
|-------|--|-------------|--|
| Name | | Division | |
| Title | | Employee ID | |

DETAILS

| N° | CRITERIA | CONTENTS |
|----|---|----------|
| 1 | Date of receiving the gift | |
| 2 | Gift description | |
| 3 | Estimated value of the gift | |
| 4 | The person who gave the gift | |
| 5 | The relationship between the gift sending person and HSC | |
| 6 | The reason for receiving or denying the gift of HSC members | |
| 7 | Other notes (if any) | |
| 8 | Confirmative sign | |
| 9 | Confirmation of direct manager | |
| 10 | Confirmation of Head of Division | |

....., date.....

Assertor*(Sign and write the full name)*