

CODES OF CONDUCT AND PROFESSIONAL ETHICS

VIETNAM NATIONAL REINSURANCE CORPORATION

*(Issued as attachment of Decision No. 76/2022/QĐ-VNR dated December 29, 2022 by the
Chairman of the Board of Directors of Vietnam National Reinsurance Corporation)*

Clarifying doubts and reporting misconduct

VINARE employees should contact their direct reporting lines or the Human Resources - General Affairs Department when they have questions regarding the contents of this Code of Conduct and Professional Ethics, or when they detect misconducts or signs of misconduct. VINARE commits to ensuring the confidentiality and anonymity of employees reporting misconducts or signs of misconduct and strictly prohibits any retaliatory actions against those reporting such behaviors.

Reporting contact:

VINARE employees can raise questions or report misconducts or signs of misconduct to the following address:

Human Resources - General Affairs Department

Vietnam National Reinsurance Corporation

7th Floor, 141 Le Duan Street, Hoan Kiem District, Hanoi.

CHAPTER I

GENERAL REGULATIONS

Article 1. Scope of Governance

The Codes of Conduct and Professional Ethics ("the Code") stipulates the standardized principles regarding behaviors and professional ethics of employees at Vietnam National Reinsurance Corporation ("VINARE"). The Code serves as a benchmark for the ethical quality and professional responsibility of employees in the business activities of VINARE. Each individual employee is required to consider this Code as a model for behavior and cultivation, striving to maintain professional reputation and the prestige of both themselves and VINARE.

Article 2. Subjects of Application

This Code applies to:

- 2.1. Employees (including officers holding administrative or managerial positions) of VINARE;
 - 2.2. Individuals dispatched by VINARE to work at (including but not limited to) its subsidiaries and/or affiliated companies;
- collectively referred to as "Officers, Employees".

Article 3. Definitions of Terms

In this Code, the following terms shall be understood as follows:

- 3.1. "Subsidiary" means an independent accounting entity in which VINARE owns over 50% of charter capital or total common shares; or VINARE has the right to directly or indirectly appoint the majority of or all members of the Board of Directors, the Chief Executive Officer of that enterprise; or VINARE has the right to decide on amending, supplementing the Charter of that enterprise;
- 3.2. "Laws" refer to all legal documents including but not limited to the Constitution, Codes/Laws, Decrees, Ordinances, Resolutions, Circulars, Regulations, Directives, and other related documents, documents issued to amend or supplement those in force by competent authorities;
- 3.3. "Internal regulations" include but are not limited to documents such as Charters/Regulations/Rules/Procedures/Guidelines/Forms/Model contracts/Code of Conduct and Professional Ethics... issued by VINARE; Charters, Regulations, and related documents of professional associations of which VINARE is a member;

Other terms which are not explained in this Code shall be understood and applied in accordance with relevant legal provisions and internal regulations of VINARE.

Article 4. Purpose

The establishment and issuance of this Code aim to:

- 4.1. Establish standards of conduct for officers and employees when performing their duties and in social relations, ensuring fairness, integrity, civility, and compliance with the duties and responsibilities of officers and employees;
- 4.2. Implement transparency and disclosure of regulations and work processes while carrying out duties, contributing to enhancing the sense of responsibility of officers and employees in anti-corruption efforts;
- 4.3. Provide a basis for VINARE to take action when officers and employees violate the standards of conduct in the performance of duties and in social relations, affecting the reputation, brand, or economic losses of VINARE;
- 4.4. Build a strong, civilized, modern VINARE, enhancing the efficiency of business operations;
- 4.5. Foster awareness of organizational disciplines and professional ethical standards to help officers and employees consistently behave in line with the committed values of VINARE; create a working environment with culture to achieve high efficiency in business activities;
- 4.6. Develop and enhance the quality of professional ethics, prevent and combat corruption; encourage saving and anti-wastefulness mindset;
- 4.7. Develop a team of officers and employees with sufficient qualifications, capabilities, good ethical qualities and unity to successfully fulfill VINARE's missions.
- 4.8. Build the image and reputation of VINARE, creating a competitive advantage as well as promoting the image and brand of VINARE domestically and internationally;
- 4.9. Ensure the core values and sustainable development of VINARE.

CHAPTER II

CONTENT OF THE CODES OF CONDUCT AND PROFESSIONAL ETHICS

Section 1

Responsibilities of Officers and Employees

Article 5. Independence, Honesty, Respect for Objective Truth

Officers and employees must be independent, honest, and respect objective truth, so as not to be misled or pressured into violation of laws and professional ethics in pursuit of their own material or spiritual interests, thereby affecting the reputation of VINARE.

Article 6. Compliance with Laws and Related Regulations

In addition to complying with the laws, officers and employees are responsible for adhering to VINARE's internal regulations.

Article 7. Self-Improvement, Self-Cultivation

7.1. Officers and employees must continuously develop their communication and behavior skills, enhance their ethical qualities, professional conscience, and responsibility towards their profession.

7.2. Officers and employees must continuously enhance their professional and vocational qualifications, actively participate in training courses, and knowledge enhancement activities; actively research and apply advances in science and technology, promote innovation and improvement to meet job requirements effectively.

7.3. Officers and employees must actively participate in the fight against corruption, wastefulness, and social evils.

Article 8. Prohibition of Substance Abuse

All officers and employees of VINARE are strictly prohibited from engaging in the following behaviors:

8.1. Using illegal stimulants, narcotics, or psychoactive substances, or consuming excessive alcoholic beverages at the workplace;

8.2. Possessing, trafficking, using, or transporting drugs and illegal narcotics and psychoactive substances;

8.3. Working under the influence of stimulants, narcotics, or psychoactive substances, except when using medication prescribed by a doctor.

Article 9. Prevention of Discrimination and Harassment in the Workplace

9.1. Officers and employees collectively strive to create a work environment that is free, healthy, and respects human rights and privacy. Officers and employees jointly endeavor to build a workplace free from any form of discrimination against other officers and employees based on race, skin color, religion, gender, ethnic origin, age, disability status, marital status, social status, personality, lifestyle, thought process, work experience, or other legally protected differences.

9.2. All officers and employees, regardless of gender, age, position, type of labor contract, or job status, have the right and responsibility to ensure a workplace free from sexual harassment, to prevent and report any unacceptable behaviors as stipulated by the law on sexual harassment.

9.3. Officers and employees are responsible for collectively building, maintaining, and developing a professional and open work environment, creating equal job opportunities for officers and employees in accordance with the law. Decisions made by VINARE in recruitment, training, and promotion are based on work efficiency, individual capabilities, internal regulations, and current laws.

Article 10. Reporting Misconduct

10.1. Officers and employees are responsible for immediately reporting to their direct reporting lines or to the Human Resources - General Affairs Department upon discovering any violations of the laws, non-compliance with internal regulations, or violations of this Code.

10.2. Officers and employees may report misconducts via direct conversations, phone calls, emails, or in writing and may request confidentiality. If reporting in person or by phone, officers and employees are responsible for sending a formal report via email or in writing afterwards. Direct managers or the Manager of the Human Resources - General Affairs Department shall be responsible for acknowledging receipt of such reporting and documenting the subsequent actions taken upon receiving the report.

10.3. VINARE is committed to ensuring the confidentiality and anonymity of officers and employees reporting misconducts, and prohibits any retaliatory actions against those reporting misconducts. However, intentionally providing false reports to cause difficulty for others will result in disciplinary actions in accordance with regulations.

10.4. When a misconduct is reported, all relevant parties must cooperate with the company to investigate and clarify the situation. Any individual providing intentionally misleading information during the investigation process will face disciplinary actions, including termination of employment.

Article 11. No Solicitation or Temptation of Officers, Employees, or Customers

In the absence of other legal provisions and without the consent of VINARE, during their employment at VINARE, officers and employees shall not:

11.1. Directly or indirectly engage in actions that may affect VINARE's relationship with any organization or individual who is or has been a customer or is in negotiation with VINARE; or

11.2. Directly or indirectly solicit or tempt, or attempt to solicit or tempt any officer or employee of VINARE to resign; or

11.3. Directly or indirectly solicit, persuade, or attempt to persuade any customer of VINARE to cease all or part of their business activities with VINARE.

Section 2

Responsibilities of Officers and Employees to the Company

Article 12. Upholding the Dignity, Reputation, and Traditions of VINARE

12.1. Officers and employees must preserve and protect the dignity and reputation of VINARE as they would their own; build, strengthen, maintain, and enhance the trust of customers, the community and peer companies in the insurance industry.

12.2. Officers and employees have the obligation to promote the good traditions of VINARE; continuously improve their professional qualifications; to maintain the qualities, personality, and professional reputation; to exhibit proper conducts and cultural behaviors in the industry, and lifestyle; and to be worthy of the trust and respect of the community, colleagues, and the insurance industry.

Article 13. Confidentiality of VINARE Information

13.1. Confidential information of VINARE includes, but is not limited to, the following types of information:

- (i) Business secrets of VINARE;
- (ii) Projects and contracts that VINARE has undertaken and is currently undertaking;
- (iii) Partners and customers that have, are, and will establish relationships with VINARE;
- (iv) Internal data, reports on the internal situation, financial, and personnel of VINARE, excluding information disclosed publicly according to legal regulations;
- (v) Information related to access names and passwords to access systems, software programs at VINARE;
- (vi) Other information related to the activities of VINARE and its partners, customers obtained by officers and employees during their work, excluding information disclosed publicly.

13.2. Officers and employees commit to maintaining the confidentiality of VINARE's confidential information as stipulated in paragraph 1 of this Article, except in cases where it is required for work purposes and with the written consent of VINARE. Officers and employees commit to safeguarding VINARE's confidential information under the same standards as their own information security. Specifically, officers and employees are not allowed to communicate, access, advise, or provide information to any organization or individual without obtaining written consent from VINARE.

13.3. In the event of no longer working at VINARE (termination of employment contract, dismissal, etc.), officers and employees must return to VINARE all received confidential information as well as related derivative information, including but not limited to the original information.

13.4. VINARE commits to keeping the personal information of officers and employees confidential. Except for job-related functions (human resources management and leadership responsible for personnel management), no one is allowed to access systems, databases, or records containing personal information of other officers and employees, including those who have left the company and job applicants at VINARE.

Article 14. Protection of VINARE's Assets

14.1. All officers and employees must be conscious of and responsible for properly managing all of VINARE's assets to use them efficiently, sustainably, and to best serve VINARE's daily work requirements, from office facilities, furniture, vehicles to machinery, and work tools assigned to officers and employees to serve their duties.

14.2. Any officer or employee who damages, loses, or engages in activities that destroy VINARE's assets will be subject to sanctions according to internal regulations and laws, depending on the severity of the violation. Cases of fraud, theft, misuse, misappropriation, or unauthorized use of VINARE's assets will be handled according to legal regulations and VINARE's internal provisions.

Article 15. Ensuring Accuracy of Records and Data in Work

15.1. Records and documents related to VINARE's business activities must be prepared and used accurately and carefully. Detailed information about partners and transactions of VINARE with related parties must be accurately recorded in the books and documents stored as required.

15.2. Officers and employees are not allowed to replace or distort stored information.

15.3. Compliance with accounting principles and standards as stipulated by the law.

15.4. Prohibition of any acts of coercion, pressure, deception, or confusion towards auditors conducting work at VINARE.

15.5. Officers and employees are responsible for complying with VINARE's regulations on correspondence and storage. The storage and disposal of documents after the expiration of the retention period or in other cases are carried out in accordance with the law and VINARE's internal regulations. Violations of regulations regarding correspondence and storage will be held accountable according to the law and VINARE's internal regulations.

Article 16. Information Technology System and Intellectual Property Ownership

16.1. The information technology system is one of VINARE's important intellectual assets. Officers and employees using this system must comply with information security management policies and the Labor Regulations regarding the protection of VINARE's assets and business secrets. Evidence of misuse of the network system provided by VINARE may result in the suspension of access rights and the application of appropriate disciplinary measures.

16.2. VINARE's officers and employees are not allowed to use the information technology system to create, store, or transfer information related to violence, harmful content, legal violations, gender discrimination, harassment, religious insults, or infringements on the rights of others. It is prohibited to use VINARE's information technology system to access websites containing illegal information, pornography, or discriminatory contents.

16.3. Intellectual property is a property owned by VINARE and must be protected. Intellectual property includes but is not limited to inventions, industrial designs, trademarks, copyrights, or other industrial property rights as regulated by the Intellectual Property Law, which are developed or obtained by officers and employees through the use of VINARE's resources during their employment. Officers and employees who have access to intellectual property assets are not allowed to disclose or misuse them for unauthorized purposes during their employment or after leaving VINARE, except as permitted by law and/or with the consent of VINARE.

16.4. Officers and employees are responsible for cooperating to the best of their abilities to ensure VINARE's interests regarding intellectual property assets owned by VINARE. Third-party intellectual property protected assets should not be used in VINARE's work processes without approval from the respective entity.

16.5. VINARE respects the legitimate software copyrights of suppliers. Officers and employees are not allowed to use or copy software without the consent of the suppliers.

16.6. When officers and employees have access to any confidential information of VINARE and notice that this information has been improperly compromised, they should report it immediately to the Human Resources - General Affairs Department for appropriate action.

Article 17. Protection of Customer Personal Information

17.1. Strict adherence to regulations on the security of customer information is paramount in safeguarding the reputation and brand of VINARE. Officers and employees are obligated to maintain the confidentiality of customer personal information during the provision of services and after completion. Personal information includes, but is not limited to, the following: national identification numbers, citizen identity card numbers, personal financial information such as bank account details, and health-related matters, among others.

Article 18. Information and Public Relations

18.1. Officers and employees are responsible for adhering to regulations regarding the use of branding, advertising, etc. When advertising VINARE, clear information must be provided to avoid misunderstandings.

18.2. Officers and employees are prohibited from engaging in advertising that adversely affects the honor and reputation of VINARE.

18.3. When providing information to the press, public media, or using social media, officers and employees must provide accurate, honest, objective information and refrain from disclosing confidential information, and must protect the image of VINARE.

18.4. Officers and employees are not allowed to intentionally misrepresent the truth through the press, public media, or social media for personal purposes, other motives, or to create public opinion to protect illegal interests of customers, other individuals, or make statements that affect national security, public interests, and the interests of VINARE.

18.5. Officers and employees are not permitted to write articles, make statements in the press, public media, in public places, or use social media to speak ill, criticize, slander, or cause internal division among colleagues, causing harm to the honor and reputation of VINARE.

Article 19. Avoiding Conflicts of Interest with VINARE

19.1. A conflict of interest arises when the interests or obligations of an officer or employee are incompatible with those of VINARE or a third party, leading to situations where VINARE's ability to protect its rights and interests may be compromised.

19.2. While working at VINARE, officers and employees need to proactively avoid conflicts of interest. If an unintended conflict of interest is identified, officers and employees must promptly inform their direct reporting lines.

19.3. Any behavior that prioritizes personal interests over or contradicts the interests of VINARE is strictly prohibited.

19.4. Engagement in external activities that compete with or impact the interests of VINARE is prohibited. In cases where officers and employees are involved in external investments or businesses, the following principles must be adhered to:

(i) External investments or businesses must not affect the quality of work at VINARE. Such activities should only be conducted outside official working hours.

(ii) Participation in the management, operation, or work for insurance/reinsurance companies without the assignment/permission of VINARE is not allowed.

19.5. Officers and employees are not allowed to exploit personal gains using internal information obtained from their positions that have not been made public.

Section 3

Responsibilities of Officers and Employees towards Colleagues

Article 20. Work Relationship with Colleagues

20.1. In communication and within the work environment, officers and employees must respect and assist each other in a spirit of construction, unity, and friendliness, without discrimination based on age and seniority.

20.2. Officers and employees should not allow differences in work to affect their relationships with colleagues in VINARE.

20.3. Officers and employees should always be conscious of respecting, cooperating with, and assisting colleagues in both work and life; providing timely feedback when they notice colleagues acting in a manner that could compromise the reputation of VINARE.

20.4. Officers and employees should refrain from engaging in unhealthy competition that could adversely affect the legal rights and interests of their colleagues.

Article 21. Work Relationship with Higher-Level Leaders

21.1. In the work relationship with direct reporting lines, officers and employees are responsible for complying with labor discipline and carrying out the tasks assigned by their senior officers. If they observe unreasonable or inappropriate directives or management that does not align with the actual situation, officers and employees have the responsibility to provide feedback for the direct reporting line to review.

21.2. In cases where the direct senior officer maintains their directive opinions, officers and employees are obligated to follow through but have the right to reserve their personal opinions and may report to higher-level leadership for further review.

Article 22. Relationship with Subordinate Colleagues

22.1. Serve as a role model in behavior in work and life, adhere to labor discipline, laws, and internal regulations of VINARE.

22.2. Direct, guide, instruct, and train officers and employees within the management scope to perform their duties properly, comply with legal regulations, VINARE's internal regulations, and the rules outlined in this Code.

22.3. Support officers and employees in resolving difficulties and challenges, ensuring fairness for all officers and employees.

22.4. Protect the identity of officers and employees when receiving complaints and reports of violations of this Code.

Article 23. Prohibited Actions of VINARE Officers and Employees

23.1. Engage in slanderous speech or behavior, demeaning the honor, integrity, or reputation of colleagues, using tactics to undermine the credibility of colleagues to elevate oneself or exert pressure, threaten colleagues; collude with colleagues to seek personal gain; create disorder, engage in physical altercations, adversely affecting the reputation and culture of the Company.

23.2. Incite colleagues to act against the Code or create internal conflicts within VINARE.

23.3. Form factions or groups of officers and employees to isolate colleagues during their tenure at VINARE.

23.4. Impose or intentionally influence, affecting the independence and objectivity of colleagues who have dependent relationships such as mentorship, supervisor-subordinate, familial, or close relationships.

23.5. Compare professional capabilities, discriminate based on regional differences, or professional activities of colleagues.

23.6. Engage in other actions deemed equivalent in severity.

Article 24. Principles and Basic Content of Conflict Resolution among Officers and Employees

When conflicts arise in work, officers and employees must adhere to the following principles in the process of resolving conflicts:

24.1. Principle 1: Transparency and Listening

(i) When conflicts arise, officers and employees will transparently present the issue and the reasons for the conflict to all relevant parties when initiating dialogue about those conflicting issues.

(ii) It is essential to understand that conflicts are about specific issues and not about evaluation of individuals.

(iii) Officers and employees should listen to the opinions of colleagues before presenting their own views. They should put themselves in the position of their colleagues to listen, try to understand their goals, perspectives, and reasons when resolving conflicts.

24.2. Principle 2: Consciousness in Resolving Conflict Issues

- (i) As soon as conflicts arise, officers and employees should promptly engage in discussions with relevant colleagues regarding the conflict and the involved parties to find solutions, without involving other parties for gossip or forming factions.
- (ii) Officers and employees should strive to resolve conflicts with colleagues before reporting to higher authorities.
- (iii) Focus should be placed on agreed-upon aspects, fostering consensus on common goals, and jointly evaluating the advantages/disadvantages of each solution before resolving differences.
- (iv) After discussions, agreements, and decisions on issues have been made by the competent authorities, officers and employees should not revisit the matter and should demonstrate unity with the decisions made.

24.3. Principle 3: Spirit of Cooperation

Officers and employees should clearly explain points that they believe cannot be negotiated to find solutions. They should understand that all differences can be negotiated to achieve solutions beneficial to all parties and the organization.

Article 25. Establishing a Healthy Working Environment

25.1. VINARE is committed to safeguarding the health and safety of its officers, employees, customers, shareholders, and partners who come to work.

25.2. Officers and employees are responsible for complying with regulations in the Labor Regulations regarding occupational safety and health and current laws, promptly notifying their direct managers when:

- (i) Observing or noticing unsafe working conditions that pose risks to individuals and others;
- (ii) Suspecting that vehicles or equipment are being operated improperly and could jeopardize safety;
- (iii) Colleagues are not following procedures correctly, which could compromise safety.

25.3. Officers and employees have the right to refuse if asked to perform work for which they have not been properly trained, and which may pose a danger to themselves or others.

25.4. Officers and employees have the right to refuse working and leave the workplace if they perceive a risk of workplace accidents or serious threats to their own and others' lives and health, until such risks are mitigated.

25.5. Officers and employees are prohibited from engaging in violent behavior, including threats, harassment, intimidation, or attacks, or similar behavior in the workplace. They should not carry

weapons or dangerous items that pose a risk to the lives and health of others, except in cases where it is necessary to fulfill legal obligations and with the consent of the leadership.

Section 4

Responsibilities towards Customers, Partners, Suppliers, and Other Relevant Parties

Article 26. Principle of Customer-Centricity

26.1. VINARE is committed to respecting the interests of customers, partners, shareholders, and ensuring equal opportunities for them in exchanging information and creating a transparent business environment.

26.2. When working with customers, partners, shareholders, and other relevant parties, officers and employees have the responsibility to:

- (i) Be honest and dedicated to customers, partners, shareholders, and relevant organizations and individuals;
- (ii) Diligently resolve any difficulties or obstacles faced by customers related to VINARE based on mutually beneficial solutions;
- (iii) Commit to safeguarding the information of customers, partners, shareholders, and other relevant organizations and individuals transacting with VINARE. Officers and employees are not permitted to disclose information to any organization or individual unless they are related to the job or mandated by competent state authorities or in VINARE's regulations;
- (iv) Fulfill other responsibilities as stipulated in VINARE's internal regulations.

Article 27. Responsibilities towards Political Organizations, Political - Social Organizations, Professional Social Organizations

27.1. VINARE encourages officers and employees to participate in community activities, including joining political organizations and political - social organizations in accordance with legal regulations.

27.2. VINARE pledges not to use funds or any resources of VINARE for political activities of individuals within competent state agencies, including supporting individuals or candidates participating in the machinery of competent state agencies. Enhancing the position of VINARE related to contributions with political or social significance must comply with current legal regulations.

Article 28. Responsibilities towards State Agencies and Laws

28.1. Officers and employees have the responsibility to immediately report to their direct reporting lines upon receiving any request from competent state agencies via telephone, email, or other means, and to provide accompanying documents/materials if applicable.

28.2. Requests from competent state agencies must be responded to with authentic, complete, and accurate information. During inspections, audits, investigations, or audits, officers and employees are not allowed to conceal, destroy, or replace any documents, nor are they allowed to deceive or provide inaccurate information to any representatives of competent state agencies. They are also prohibited from inciting others to carry out similar actions.

Article 29. Responsibilities towards the Community and Society

29.1. VINARE, on behalf of its shareholders, implements community development projects to benefit both the community and VINARE by maximizing the value of community projects for local residents.

29.2. VINARE's community activities focus on four main areas: eradicating hunger and reducing poverty; investing in education and the younger generation; paying tribute to heroes and martyrs and their families who contributed to the revolution; mitigating the consequences of natural disasters, epidemics, and other charitable activities.

29.3. VINARE encourages officers and employees to share difficulties with the community by actively participating in charitable activities and volunteer programs initiated by VINARE.

29.4. Officers and employees conscientiously share difficulties with other officers and employees in the company when encountering challenges through charitable activities initiated by VINARE or other sharing and contributing activities.

29.5. Officers and employees have awareness and express gratitude to the previous generations of officers and employees who laid the foundation and contributed to the growth of VINARE.

Article 30. Responsibilities towards the Environment

30.1. VINARE commits to comply with the legal regulations on environmental protection during the company's operations.

30.2. VINARE actively protects the environment by engaging reputable contractors who prioritize environmental protection, ensuring the rights of officers, employees, and maintaining ethical business practices.

30.3. Officers and employees must be conscious of environmental protection, contributing alongside VINARE to achieve environmental goals, aiming for sustainable development, including:

- (i) Maintaining cleanliness and orderliness in the workplace environment, ensuring a clean and well-ventilated working environment.
- (ii) Conserving energy resources such as electricity and water used in VINARE offices.
- (iii) Practicing paper and office supply conservation, promoting the reuse of materials that can be harmful to the environment (paper, plastic, nylon, etc.).

30.4. VINARE minimizes environmental impacts by controlling and reducing energy consumption from business activities, etc.

Article 31. Anti-corruption Measures

31.1. The act of bribery for any purpose is illegal.

31.2. Officers and employees are responsible for adhering to VINARE's internal regulations and legal provisions related to anti-corruption.

Article 32. Prevention and Combating Money Laundering and Terrorist Financing

32.1. VINARE complies with legal regulations regarding the prevention and combating of money laundering or financing for unlawful, unjustifiable purposes, or attempts to convert illegal funds into legitimate ones.

32.2. VINARE always respects and adheres to international instruments, agreements, and common practices concerning the prevention and combating of money laundering and terrorist financing.

32.3. Officers and employees are responsible for complying with internal regulations on money laundering prevention and related legal provisions.

Chapter III

IMPLEMENTATION

Article 33. Handling Violations

33.1. Depending on the nature, circumstances, and severity of the violation of these Rules, officers and employees may be evaluated for ineffective performance, not eligible for salary raise when due, or subject to disciplinary actions according to legal provisions and internal regulations of VINARE.

33.2. Violators may be required to compensate for material damages or prosecuted criminally according to legal provisions.

Article 34. Implementation

34.1. All officers and employees are responsible for complying with and implementing the provisions of these Rules.

34.2. Amendments and supplements to the provisions of these Rules are decided by the Chairman of the Board of Directors based on the proposal of the Chief Executive Officer. The modified contents shall be widely publicized according to current regulations and internal regulations of VINARE.

CHAIRMAN OF THE BOARD OF DIRECTORS

NGUYEN ANH TUAN

