

CODE OF CONDUCT AT SEABANK

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CODE OF CONDUCT AT SOUTHEAST ASIA COMMERCIAL JOINT STOCK BANK

(Issued under Decision No. 144/2022/QĐ-HĐQT dated 10/02/2022)

**CHAPTER I
GENERAL PROVISIONS****Article 1. Purpose**

1. Southeast Asia Commercial Joint Stock Bank ("SeABank") promulgates the Code of Conduct to set standards for the behavior of SeABank employees towards each other, SeABank and especially customers and the public. These rules play an essential role in improving the professional ethics of employees, preventing unhealthy competition practices, enhancing service quality, and ensuring and maintaining SeABank's reputation among customers, shareholders, employees, and competent authorities, contributing to the healthy, stable, and sustainable development of SeABank.
2. The Code of Conduct is the basis, not only for employees to make the right decisions while performing professional activities, but also for SeABank to assess the quality, ethics, and lifestyle of employees and take disciplinary actions against violations committed by employees.

Article 2. Governing scope and applicable entities

1. **Governing scope:** This Code of Conduct applies to the whole system of SeABank (hereinafter collectively referred to as SeABank).
2. **Applicable entities:** This Code of Conduct applies to all employees of SeABank and its partners and outsourced service providers working for SeABank or working at SeABank's business units, divisions/departments/departments.¹

Article 3. Definitions and abbreviations

When used in the Code of Conduct at SeABank, the following terms shall be defined as follows:

1. **Code of Conduct:** are written rules on professional ethical codes issued by SeABank to regulate the behavior of SeABank employees towards relevant entities when working at SeABank.
2. **Employees:** employees of SeABank or its partners, outsourced service providers working for SeABank under labor, seasonal, employment contracts, apprentices, and internship contracts.
3. **Related persons of an employee:** are individuals and organizations that have direct or indirect relations with employees in the following cases:
 - a) Spouse, parents, children (including adoptive parents, adopted children, parents-in-law, children-in-law; stepparents, stepchildren), siblings (including half-siblings), brothers-in-law, sisters-in-law of employees;

¹ Applicable entities do not include members of the Supervisory Board and the Internal Audit of SeABank

- b) Company or credit organization of which 5% or more of charter capital or capital with balloting right is held by the employee;
- c) Subsidiaries where an employee is a manager, member of the Supervisory Board of the parent company or the parent credit institution;
- d) Subsidiaries where an employee has the authority to appoint managers, members of the Supervisory Board of the parent company or the parent credit institution;
- e) The company or organization of which the employee is the manager, a member of the Supervisory Board;
- f) Company or credit organization in which an employee is a spouse, parent, child (including an adoptive parent, adopted child, parent-in-law, child-in-law, stepparent, stepchild), sibling (including a half-sibling), brother-in-law, sister-in-law of a manager, member of the Supervisory Board, capital contributor or shareholder owning 5% or more of the charter capital or capital with balloting right of the company or the credit institution;
- g) Organizations and individuals authorizing the employee to represent the contributed capital and shares;
- h) Individuals who are authorized by an organization to represent the capital contribution or shares in another organization with the employee;
- i) Individuals authorized by employees to represent contributed capital and shares.
- j) Other cases on the related person(s) as per internal regulations of SeABank.

4. **Internal regulation document:** a document issued by the Competent Authority at SeABank, containing regulations, rules, and professional guidelines that are generally and uniformly applied to all subjects or a group of customers. object in the SeABank system, effective and mandatory within one (some or all) of SeABank's affiliated units.

5. **Fraud:** any dishonest act performed by any individual or organization to obtain benefits for themselves or a third party or cause damage/loss to SeABank.

6. **Corruption:** is the act of a person holding a position, power, or assigned a task or having authority abusing the position, power or task for private gain. Private gain: material and spiritual benefits that people with positions and powers gain or can obtain through corrupt acts.

7. **Gifts:** the exhibits include souvenirs, catering and entertainment services, coupons, promotional vouchers, meals/parties, forms of consumption, and other types of gifts.

8. **5T Standards:** SeABank compliance standards set are the core standards, principles and guidelines in all activities and decisions of all employees, including:

- **Self-discipline** (Tự giác): Self-discipline is the proactive awareness of SeABank's responsibility to comply with laws, Conduct and regulations. Self-discipline is the leading strength to create a culture of compliance with SeABank.

- **Honesty** (Trung thực): Be honest when working and avoid conflicts of interest in the process of doing business.
- **Awake** (Tỉnh táo): Stay awake, raise your vigilance, and keep your spirit of steel against all temptations and pressures.
- **Denunciation** (Tố giác): Report as soon as you catch cheating, or not compliance through Hotline: baocaosaipham@seabank.com.vn, say no to violations or frauds.
- **Communication** (Truyền thông): Communicate to improve Compliance culture, Management, and employees and among colleagues.

9. **Compliance Hotline**: the phone number of the Head of Legal and Compliance Division from time to time or email address: baocaosaipham@seabank.com.vn.

10. **Risk Management Division**

11. **Operational Risk Hotline**: is the phone number of the Head of Operational Risk Management of the Chief Risk Officer or email address: gs.rhd@seabank.com.vn.

12. **HR Division**: Human Resource Management and Development Division

13. **L&C Division**: Legal and Compliance Division

14. **Credit institutions**

15. **BU**: Business unit

16. **State agency**: an organization established and authorized under the provisions of the law to perform the tasks and functions of the State

17. **Head of Unit**: the head of Departments, Departments, Business Centers at Head Office, Director of Business Units, Deputy Director in charge of Business Units (in case a Business Unit does not have a Business Unit Director) or other similar titles. equivalent to SeABank's regulations from time to time.

Article 4. General principles

1. Employees are obliged to respect the standards set out herein while performing their tasks. When working at SeABank, each individual must be responsible for complying with the law, this Code of Conduct, 5T standards and SeABank's regulations and policies. No SeABank employee may cause damage to SeABank to gain benefits for herself/himself or another entity.

2. Early detection and resolution of ethical issues play an important role in ensuring the sustainable development of SeABank. Therefore, each employee must always cultivate, practice, build professional courage, maintain integrity, and transparency, work with the highest ethical standards, keep up the ethical codes, treat colleagues, customers, and partners with devotion, and work to gain the most competitive advantage with the best product and service quality, ensuring honesty, objectivity, fairness, and transparency.

3. When detecting violations of the Code of Conduct, employees are responsible for reporting to the line manager of the individual of concern and the Head Office via the Compliance & Risk hotline and the focal point specified herein.
4. To ensure that employees understand the rules and standards of Conduct, SeABank recommends its employees examine and comprehend these codes of Conduct. In case of uncertainty about how to behave in any situation, employees should consult with their line managers, the Legal and Compliance Division or the authorized person of the unit where they work.
5. Failure to comply with these rules may result in disciplinary action and compliance sanctions by SeABank. In addition, depending on the severity of the violation, the violators shall also be held liable to the law for their behavior.
6. In the process of developing and issuing internal regulatory documents, SeABank ensures that there is a separation of responsibilities and a two-step control mechanism: implementation and control to prevent risks and avoid the situation in that one person spends money. coordinate the entire process.
7. SeABank actively monitors and investigates all violations concerning this Code, especially those related to theft, fraud, bribery, or any other relevant form of corruption. Employees are treated fairly, but anyone committing acts of violation will be subject to disciplinary to the extent as per applicable laws and internal labor regulations or other SeABank's by-laws from time to time.

CHAPTER II THE PRINCIPLES UNDER THE CODE OF CONDUCT AT SOUTHEAST ASIA JOINT-STOCK COMMERCIAL BANK

Article 5. Responsibility towards SeABank

1. Principle 1: Adherence to legal regulations, internal regulations, directions and instructions of SeABank

While working for SeABank, employees are responsible for complying with legal regulations, internal regulations, policies, professional processes, direction, and guidance of SeABank (professional instructions issued by professional units, email instructions from leaders, professional manuals, and other documents ...) that have been issued and communicated at SeABank.

Do not perform or direct the performance of tasks contrary to the provisions of applicable law or SeABank's internal regulations for any reason whatsoever, including to fulfill the assigned targets and plans. If an employee is asked by a manager to perform any task that is contrary to the law or internal regulations, direction, and guidance of SeABank, s/he needs to report the case to the Legal and Compliance Department via the compliance hotline.

Not to collude, abetting acts that violate the laws and regulations of the banking industry and of SeABank; avoid being influenced or interfered with leading to the contravention of laws and regulations of SeABank.

Employees must not be subjective, reckless, easygoing, or gullible; Do not shorten or skip steps and procedures in the prescribed business process, must uphold the spirit of self-responsibility, voluntarily submit to supervision and control according to regulations, to avoid errors, negligence in the process of solving work.

Employees who violate one of the policies, regulations, or professional processes shall be liable to SeABank and the law. The violator shall compensate for the damages to SeABank (if any) and be subject to the corresponding disciplinary according to the provisions of SeABank's Labor Regulations, and corresponding compliance sanctions according to the Compliance Control Process at SeABank (No. 18802/2020/QD-TGD) and other documents to replace, amend and supplement in each period.

2. Principle 2: Confidentiality of SeABank's information

While working and after terminating employment at SeABank, employees are responsible for keeping the information (in written and/or digital form) that have known during work at SeABank confidential, including strategy and project documents action plans, figures, reports on the financial situation of SeABank (which are not subject to disclosure as per regulations), professional documents, emails directing /orientation /internal exchange, technology systems, promotional programs, regulations on products and services of SeABank, information about customers, suppliers, partners, SeABank employees and other information which has been identified as confidential or internal. SeABank employees are responsible for complying with the followings:

- a) Legal provisions on keeping confidential the state secrets and SeABank's classified information known to the employee during their course of work at SeABank; Employees do not arbitrarily provide such information which may adversely affect SeABank's operations in any case whatsoever. In case the competent agency requests to provide information, the employee must report to the competent authority for consideration and decision according to Regulation on information management and confidentiality No. 743/2021/QĐ-HĐQT and other documents to replace, amend and supplement in each period;
- b) Employees are not allowed to use the information known to them for purposes other than their assigned functions and tasks, to benefit themselves, or others, or hurt the legitimate interests of SeABank and/or other entities;
- c) Do not contact, exploit or use confidential information about SeABank outside the authority;
- d) Adopt information security measures and actions as per the laws and regulations of SeABank to ensure that: The process of issuing, copying, sending and receiving, preserving, storing, and disposing of data does not lead to information leakage to those without authorized access to the workplace, access to a personal computer must be fully controlled to avoid access by unauthorized individuals;
- e) With digital information, it is necessary to comply with regulations related to computer access, intranet, password, and identification code to prevent unauthorized access to SeABank's information;
- f) Do not install, modify, supplement or copy software on SeABank's intranet system by yourself;
- g) Not to use the bank's system to find out information about customers unless such information is directly related to the employee's tasks. Do not discuss SeABank's classified, secret, and top-secret information (hereinafter referred to as "Confidential Information" - according to Regulations on information management and security of SeABank) in public places, forums (including internal forums of SeABank), on the mobile phone network, or other means of communication;

- h) Do not disseminate or discuss personal information, or private life secrets of employees (including medical and personnel records of employees) unless at the request of legal authorities. Providing personal profile information to external organizations under any form is subject to the consent of the competent authority by the Regulation on information management and security of SeABank.
- i) To ensure information security, employees need to implement some measures, including:
- i. All employees must ensure that at the closing of business day, no documents containing information related to SeABank's operations are left on their desks;
 - ii. All documents, notebooks, reports, documents, and other papers must be securely stored in locked personal/general file cabinets;
 - iii. The destruction of documents with confidential information must be done by the law and SeABank's regulations. For other documents, the destruction of documents is done by SeABank's Regulations on information management and security.
 - iv. Comply with other provisions of law, SeABank's regulations on information system safety and SeABank's Regulation on information management and security.
- j) If detecting vulnerabilities in information technology system, employees are responsible for timely reporting to Digital Banking Technology Division via the email address: attt@seabank.com.vn, and to the Deputy General Director in charge of Digital Banking Technology Division and the General Director;
- k) If detecting other information leakages and violations of the aforementioned, the employees have the responsibility to report promptly to the Legal and Compliance Division via the compliance Hotline. After verification, the L&C Division shall send information to Risk Management Division at the email address: gs.rrhd@seabank.com.vn.

3. Principle 3: Confidentiality of customer information

One of SeABank's important assets is the trust and reputation built with customers. Therefore, keeping customer information safe and using it appropriately is SeABank's top priority. Therefore, employees need to adhere to the following contents:

- a) It is strictly forbidden to buy and sell customer information;
- b) It is strictly forbidden to erase, modify or falsify customer information;
- c) Employees need to be careful with customer information, and ensure that customer information is not leaked, taken advantage of, or discussed;
- d) Employees are not allowed to disclose customer information to anyone except in the case of being provided with information by the law and SeABank's regulations;
- e) Employees are only allowed to use customer information for business activities for the purposes specified by SeABank and/or with the consent of SeABank's competent authorities;
- f) Employees must promptly report to the competent management in case of detecting or suspecting that customer information is leaked or taken advantage of, at the same time must immediately apply measures to prevent information leakage and abuse;
- g) The provision of customer information must comply with SeABank's regulations from time to time.
- h) Customer information must be stored accurately and fully updated by SeABank's regulations.

4. Principle 4: SeABank's Reputation and Brand protection

a) Reputation and Brand are important assets of SeABank. Damages to SeABank's reputation and credibility can have far-reaching effects on its business activities. Therefore, employees are responsible for complying with the followings:

- i. Regulations on the use of SeABank's Brand and trademarks in all documents, external transaction documents, marketing publications, emails, billboards, name cards, ATMs, uniforms or vehicles labeled with SeABank's name, trademark, logo at public places or any location to avoid direct/ indirect negative impacts on SeABank's image;
 - ii. Each employee is a representative, a brand ambassador of the prestige, reputation, and image of SeABank, always striving to bring the best experiences and emotions to customers, partners and related parties;
 - iii. Do not take actions, statements, comments, sharing, etc. of disadvantage concerning products, services, or anything related to SeABank on the media, the Internet;
 - iv. If detecting that SeABank's Brand and/or other trademarks are not used for the proper formats, or purposes or violate copyright, employees are responsible for promptly notifying their line managers or the Communication and Marketing Department via the mailbox: comm.center@seabank.com.vn or a unit in charge from time to time.
- b) To protect SeABank's reputation and brand, when communicating, speaking, and providing information to the media and/or the public, it is always necessary to be careful and strictly comply with SeABank's regulations and laws. Employees are responsible for complying with the following contents:
- i. The Department of Communication and Marketing is the unit responsible for establishing and maintaining regular relationships with media agencies to provide adequate information by the law on information disclosure and unscheduled information according to the operational requirements of SeABank. All inquiries from the press and media related to SeABank must be sent to the Communications and Marketing Department of SeABank. Employees are only allowed to contact, speak, and provide information to the mass media and/or the public, including on external forums and the internet when approved by the Competent Authority or in compliance with the law, comply with SeABank's Regulation on information management and security.
 - ii. When asked by the media to answer or speak, employees need to explain SeABank's internal process in this regard, and at the same time suggest contacting the Communications and Marketing Department for answers. If an answer is required, the employee clearly states that he or she will answer on behalf of the individual, not on behalf of SeABank. At the same time, the content of the reply must ensure that others do not misunderstand that it is the answer of SeABank and require that when media agencies publish information outside will not have information about respondents by title at SeABank.
 - iii. Certain statements/publications/appearances to the public on behalf of SeABank must be approved by the Competent Authority in terms of manner and content before they are spoken/released by the content regulations. Department of SeABank.
 - iv. SeABank's regulations on speech and communication.

5. Principle 5: SeABank's Assets protection

- a) SeABank's assets are those specified in the Asset Management Regulations at SeABank No. 12660/2018/QD-TGD and its replacement, amended and supplemented documents from time to time.
- b) To protect SeABank's assets, each employee is responsible for compliance as follows:
 - i. Strictly comply with regulations on asset management of SeABank supplementing from time to time;
 - ii. Only use SeABank's assets for the Bank's work, not for personal or other purposes without the permission of the Competent Authority.
 - iii. It is strictly forbidden to destroy, appropriate, waste or inefficiently use SeABank's assets, hurting the reputation and interests of the bank;

- iv. when performing the task of paying money, receiving money and assets for the Bank, employees must ensure compliance with regulations on delivery, preservation and transportation of cash, precious assets and valuable papers of the Bank;
- v. Inventions, upgrades, innovations, or professional processes created by employees while working at SeABank are the intellectual property of SeABank. Therefore, it is strictly forbidden to copy, sell and distribute information classified as SeABank's intellectual property;
- vi. Comply with the archiving and preservation of documents, and at the same time take timely measures in case of lost /damaged documents by the process and regulations of SeABank;
- vii. Upon termination of employment at SeABank, or being transferred to another department/job, employees are responsible for handing over to SeABank the assets allocated to them in the course of work; The handover must comply with the asset handover regulations from time to time;
- viii. Employees are responsible for preserving and protecting common property. In case of detecting signs of unsafe use of property, or violation of asset management and use, employees should promptly notify by e-mail or phone call the management or the focal point specified in Clause 3, Article 4 hereof, and send information to the following units:
 - For assets on the list of treasury assets, employees shall inform the Provincial Operations Center or the Central Treasury Cluster under Operations Division or a unit in charge from time to time;
 - For assets on the list of office assets/ tools, means of transport and other buildings, infrastructure and architecture, employees shall inform the Office Administration & Asset Management of the Operations Division or a unit in charge from time to time;
 - For assets related to technology and information, employees shall inform Digital Banking Technology Division for resolution.
- ix. Comply with other regulations on asset protection of SeABank.

6. Principle 6: Compliance with SeABank's use of devices and technology

- a) For devices and technology including desktops, laptops, phones, internet access, mobile phones, and other access devices provided by SeABank to its employees for purpose of the Bank's business, employees must comply with regulations herein with ethical principles. The following acts of using devices and technology shall not be accepted at SeABank:
 - i. Failure to strictly comply with regulations on asset management at SeABank from time to time;
 - ii. Activities that violate the law such as protection of state secrets and national security.;
 - iii. Harassment or discrimination activities such as statements, threats, comments, images or messages of harassment and/or discrimination;
 - iv. Indecent, obscene activities: Accessing, viewing, and storing sexually explicit or provocative materials such as racist and gender-biased websites, ordering or distributing sexually explicit or provocative materials;
 - v. Gambling activities such as: Accessing online gambling, betting sites, placing bets online or by phone, or checking bet results;
 - vi. Activities hurting SeABank's image such as unethical or illegal actions (e.g: distribution of unauthorized or confidential information internally or externally), disruption of business activities (e.g., communicating unverified security warnings), attempting to destroy or gain unauthorized access to SeABank computers or computer systems;

- vii. Unauthorized abuse or destruction of devices and technology such as Unauthorized use/ access/ impact on devices (computers, data storage devices, etc.) and systems managed and used by others, distributing malicious software/ source code, or intentionally destroying and damaging equipment, data, technology systems;
 - viii. Acts of copying, stealing data and information technology equipment at SeABank for wrong purposes outside the scope of work;
 - ix. Disclose, share or use the same account, and password in all cases, especially lending, sharing users with important systems of the Bank such as T24, Way4, Email, Card, Los...;
 - x. Other activities that are not accepted such as: Downloading and installing non-work-related files (game files, audio files), sending mail to many people for non-business purposes, and using devices and technology beyond limits for personal use.
- b) If employees detect any acts of using SeABank's devices and technology for improper purposes, intentionally destroying or damaging assets, they are responsible for timely reporting to the focal point mentioned in Principle 5.

7. Principle 7: Ensuring the accuracy and integrity of books and data at work

The information, books, and data are the basis for SeABank to make appropriate decisions and are owned by SeABank. Therefore, each SeABank employee is responsible for ensuring that the bank's information, documents, and data are complete, accurate, updated, and fairly reflecting the business and financial situation of SeABank. Employees are responsible for complying with the followings:

- a) Ensuring that SeABank's information, documents, and data within their scope of work reflect truthfully and accurately the business and financial situation of the Bank and taking personal responsibility for the truthfulness of the information, reports, and data under their management. If they suspect or know that there is an inaccuracy in SeABank's documents or data, employees are responsible for timely reporting the matter to Finance and Planning, Legal and Compliance, and Risk Management Divisions;
- b) Ensure honest and accurate use of information, documents and documents provided by customers, suppliers, and partners...;
- c) The information and financial statements must always be prepared following the accepted accounting principles and standards as prescribed by law and must clearly and accurately show the performance and financial condition of the Bank;
- d) Committing to ensure that the information, documents, and data collected from customers, suppliers, and partners truly and accurately reflect the business and financial situation of customers, suppliers and partners. All acts of forging, altering, modifying, erasing, hiding information of customers, suppliers, partners, and/or harming the interests of the Bank; or acts of destroying records and documents related to law violations, lawsuits, or investigations by state agencies are strictly prohibited;
- e) Employees are responsible for cooperating in the inspection and examination by State agencies or the inspection and control conducted by SeABank. Any employee who makes false or misleading statements to internal auditors, independent auditors, SeABank, or employees of SeABank may constitute a violation subject to disciplinary action. Employees must not refuse or fail to report information that the competent management knows or requests to provide.

8. Principle 8: Anti-bribery policy

- a) SeABank strictly prohibits all acts of giving bribes, brokering, or accepting bribes related to colleagues, customers, partners, contractors, suppliers of SeABank or any other organization or individual for self-interest or to influence a decision, gain an advantage, avoid a disadvantage, or obtain a business opportunity for the individual, related person, or related partner.
- b) To prevent bribery, employees are responsible for:
- i. Employees do not authorize, promise, offer or provide anything of value to any organization, individual, their related person, a third party or organization charity proposed by the recipient, to influence the recipient to take or not take any official action, to induce the recipient to conduct business with SeABank or to induce the recipient to perform a duty yours is not correct.
 - ii. SeABank employees or their related persons are not allowed to receive money, or gifts from partners, customers of SeABank or from individuals/organizations related to customers, partners who are performing transactions, or important contact SeABank in any form. Employees can receive gifts by the law and of small symbolic value such as calendars, workbooks, and other symbolic gifts to create a close relationship. with partners and customers, creating favorable conditions for work and at the same time reporting to direct management for information and information;
 - iii. SeABank employees are not allowed to suggest or actively accept money or gifts in any form that affects the objectivity of their work, assessment of work quality, promotion or appointment of other employees;
 - iv. SeABank's employees who are not allowed to suggest or receive cash or gifts of any kind, which affects objectivity, quality assessment of the work, promotion or appointment of other employees;
 - v. Employees do not legalize charity activities, weddings, year-end parties or other festive occasions to receive gifts.
 - vi. If employees discover any employees violating the above contents, they are responsible for promptly reporting to the Anti-Communication Division via the Compliance Hotline.

9. Principle 9: Avoiding Conflicts of Interest

- a) During the working process, the employee may encounter conflicts of interest or potential conflicts with SeABank. A row of interest may arise when:
- i. The interests or actions of employees compete with or affect their obligations to SeABank, shareholders and customers of SeABank;
 - ii. The interests or actions of employees compete with or affect the interests of SeABank, shareholders and customers of SeABank;
 - iii. Employees or their related parties receive benefits, products, services, or preferential treatment because of that employee's position at SeABank.

b) Employees are responsible for knowing and complying with the regulations and policies of SeABank since it is not possible to list all conflicts of interest. Some typical conflicts of interest and their corresponding behavioral norm are listed below:

i. Insider trading

- During the working process, the employee can access competitive and sensitive information, which is not subject to disclosure to external parties.
- Employees are not allowed to use such information for transactions for private gain, discussion, and sharing in any form, with any individual/organization, who may use them for their purposes.

ii. Investment

- SeABank's employees are not allowed to make any personal investment in a business if this investment affects the fair business decision-making of SeABank. If such an investment is made by the employee before working for SeABank or the employee's position at SeABank is changed in a way that poses a conflict of interest, the employee must report to his line manager. The previously mentioned investments include investments in joint stock banks and private companies, organizations operating in the banking and financial sector that are suppliers or competitors of SeABank or have business relationships or are performing transactions with SeABank. Except for relationships with customers using SeABank's products, or investments with a value of less than 1% of the value of shares of the previously mentioned organizations;

- SeABank encourages its employees to participate in civic obligations, including contributing efforts and money to charity organizations and non-governmental organizations. However, joining these organizations must not cause conflicts of interest with SeABank and must comply with the provisions of laws and regulations of SeABank. Whenever discovering a conflict of interest for SeABank, employees must immediately report it to the direct manager, Unit Leader. In case of a conflict of interest with SeABank created by the Unit Leader, employees should immediately report to the General Director for an appropriate resolution.

iii. Holding a managerial position or working, collaborating for another business

- Managers at SeABank are not allowed to act as Managers or Executives of enterprises in the field of finance and banking other than SeABank, except in case of assignment or appointment by SeABank per current legal regulations
- Employees honestly declare information about their positions in the case of holding the above positions in their personnel files before joining SeABank.
- In case employees discover any employees violating the above provisions, they are responsible for promptly reporting to the Human Resources Management Division.

iv. Using SeABank's trademark, information, and image

- Employees are not allowed to use customer and product information of SeABank for private business for personal gain;
- Employees are not allowed to arbitrarily represent SeABank to issue documents, commitments, or transactions with customers, partners, etc. without following the authority specified in SeABank's internal documents. Employees must not abuse the name, facilities or relationships, or the brand and image of SeABank for any personal purposes. In case of use for charity or non-profit purposes, employees need to obtain approval from the competent authority.

v. Relationship with customers

In relationships with customers, it is strictly forbidden to perform the following acts:

- Borrowing money and assets from customers or partners having transactions with SeABank (except with other credit institutions);
- Using personal money to lend to SeABank's customers or using SeABank's name to borrow money from customers for personal purposes;
- Transacting money with customers who are not related people of employees to pay interest, fees of loans, and other fees and for personal purposes causing conflicts of interest unless approved by SeABank by internal regulations from time to time;
- Signing falsely, signing on behalf of, or forging customer signatures to complete documents; correcting, erasing, concealing customer information, performing fraudulent acts;
- Debt maturity/ supporting customers to reverse credit loans at SeABank / other credit institutions, even in the case of receiving / not receiving money from customers / related people;
- Act as an intermediary to receive/transfer money/withdraw/deposit cash for customers for personal purposes to circumvent regulations to avoid losing related fees, and exceeding customer transaction limits...;
- Receiving customer sources, receiving documents through intermediaries/referrals with fees/other sources that pose risks to SeABank;
- Employees asking customers to borrow money from SeABank on the employees' behalf or receiving or suggesting to receive material and spiritual benefits that lead to a conflict of interests with SeABank in the course of work;
- Having an emotional relationship with SeABank's customers which leads to breaching of the law on marriage and family and the acts of affecting decisions are detrimental to SeABank.

vi. Coordinating or assisting customers in making up loan plans to disburse funds from SeABank and using loans for improper purposes; concealing adverse information of customers/Security assets.

vii. Transactions with outsiders

- Employees are not allowed to use their working time at SeABank for personal tasks or jobs that are likely to affect the quality of work or conflict with their current jobs at SeABank;
- Employees are not allowed to work, collaborate, or any other form of cooperation with an external organization that is competitive and affects the interests of SeABank such as affecting its reputation, brand, interests, business conditions, or market share...;
- Employees are not allowed to abuse their positions, powers and other advantages gained from their working positions at SeABank to benefit themselves or their related persons.

viii. Transactions with employees and their related persons.

- SeABank's employees and their related persons are encouraged to use SeABank's services and products for their personal financial needs, which shall be provided in the same manner as if they were provided to SeABank's clients, by the laws and regulations of SeABank. Any agreement on the provision of services and products with better preferential and/or different conditions compared to those applied to regular customers must be approved in advance by Competent Authority at SeABank.
- To avoid conflict of interest, for employees who are directly involved in credit operations or other related operations, employees are:
 - + Not allowed to directly appraise, propose or self-approve credit for themselves/ their related parties or individuals/organizations that have a relationship of exchanging, buying and selling goods/services with employees or bring material benefits to the employees and their related persons;

- + Responsible for announcing all credit facilities of themselves (or credit facilities jointly granted to them and their related parties) at SeABank when requested by a competent authority of SeABank.

- + Not allowed to conduct and/or control, self-approve deposit transactions, or cash withdrawal transactions for themselves.

- Employees are responsible for reporting information on non-compliant transactions of employees and their related persons via Compliance and Operational Risk hotlines resolution and risk mitigation for SeABank.

ix. Recruitment/ appointment of employees' related persons

- The recruitment and appointment of employees' related persons must indicate no conflict of interests. If there is any possible conflict of interest, employees must notify their line manager to check and confirm the recruitment/ appointment of their related people. Employees and their related persons must not:

- + Work under the same line manager (directly receiving reports from employees and the related people of the employees);

- + Have a line management relationship at work;

- + Work in units participating in the same process of work

- + Work in units that have a check-and-control relationship.

- Employees are responsible for updating information with the Human Resource Management Division when their related persons are recruited to work at SeABank.

x. Theft, fraud, cheating and corruption

- Employees are not allowed to directly or indirectly commit acts of theft, fraud, cheating, create false information or consciously omit important information that affects business operations and the prestige of SeABank;

- Anti-fraud and anti-corruption activities are to protect SeABank from reputational, operational and legal risks and are SeABank's corporate social responsibility. SeABank's business practices adhere to widely accepted ethical standards and comply with legal regulations related to anti-corruption and fraud;

- All forms of theft, fraud, cheating and corruption are not accepted at SeABank. SeABank requires all employees to comply with the commitments, applicable laws and SeABank's regulations on anti-fraud and anti-corruption. In addition, employees are responsible for regularly communicating with customers and raising their awareness of anti-fraud and anti-corruption regulations at SeABank by introducing and sharing with customers fraud and corruption prevention measures.

- Fraud detection and reporting are mandatory. In case of detecting fraud, corruption, or suspicious signs, SeABank employees are responsible for immediately reporting to the Compliance and Operational Risk hotlines for resolution; the reporting must be accurate, timely and by regulations.

c) In case the employee's failure to comply with the aforementioned rules leads to a conflict of interest, in the process of handling the consequences, the interests of SeABank must be prioritized against the interests of other parties.

10. Principle 10: Report and handle violations

a) Employees need to promptly report to their line managers and/or report to the Compliance and Operational Risk hotlines when detecting contravention of law, SeABank's regulations, or acts that may damage SeABank's reputation or cause a conflict of interests:

- i. Contravention of law
 - ii. Contravention of policies, regulations and procedures has been committed or is likely to occur;
 - iii. Acts of concealing any of the above cases.
- b) Employees may report in person, by phone, via email or in writing and have the right to request that their identities are kept confidential. In case of reporting in person or via telephone, the employee is responsible for sending the official report via email (baocaosaipham@seabank.com.vn) or in writing to the Legal and Compliance Division, the Head of Division in charge of the unit where the employee works, Head of Supervisory Board or Head of Internal Audit after reporting in person, via phone.
- c) All acts of obstructing, victimization, and failing to comply with the complaint and denunciation settlement process; revealing the name, address, autograph, or other information about the reporter are strictly prohibited.
- d) Reports of violations of laws and regulations of SeABank will be verified, and violations (if any) will be handled by SeABank's regulations from time to time. Employees, the Unit may be considered for the handling of violations depending on the nature and extent of their violations (labor discipline, sanctions to comply with SeABank's regulations and may be subject to penalties and criminal prosecution by the law).

Article 6. Responsibility towards colleagues

SeABank aims to build a reliable, healthy, and professional working environment, maximizing the potential of each employee, the collective wisdom, and the strength of the organization. Employees are responsible for complying with the followings:

1. Principle 11: Working relationship with colleagues

- a) Do not speak ill of colleagues, do not spread negative reviews about colleagues to third parties;
- b) Do not have a romantic relationship with a colleague, which leads to violating the law on marriage and family;
- c) Do not avoid taking responsibility and cause your colleagues to be responsible for your shortcomings;
- d) Do not cause internal division;
- e) Not to abuse their trust or their positions and powers to create pressure to borrow money and property from colleagues or any fraud;
- f) Be honest, sincere, solidary, cooperative, sharing responsibility, and help each other;
- g) Respect and listen to colleagues' opinions; humbly absorb and learn from colleagues' experiences; give comments and analysis in the spirit of constructive discussion, openly discuss

and cooperate in work, be willing to listen to opposing opinions, argue base on factual arguments and evidence;

h) Promote teamwork; take personal responsibility for assigned tasks; Gain knowledge and experience from colleagues;

i) Encourage and support the professional development of colleagues, foster the spirit of learning and striving for improvement of colleagues;

j) Respect the privacy of colleagues.

2. Principle 12: Responsibilities and Working relationship with managers

a) Comply with labor discipline and assignment of tasks by managers by SeABank's regulations; Respect and behave properly towards managers; properly perform duties; must not commit acts that damage the reputation of managers;

b) Expressing opinions, and advice and persuading managers when necessary to avoid errors and risks in the process of handling work.

c) Do not go to the manager's private house unless invited to participate in a collective activity, or requested by the manager to deal with urgent work.

d) Employees are not allowed to offer gifts and other benefits to managers as individual

3. Principle 13: Working relationship with subordinate staff

a) The manager is a role model and inspires his staff to work according to the core values and principles of the organization.

b) Emphasize the importance of understanding and following this Code, mission goals and values, leadership principles, and policies and procedures that apply to team members' day-to-day job responsibilities.

c) Understand the potential risks in your work, individual and departmental operations and take an active role in ensuring the quality of your work.

d) Respect, listen sincerely, encourage employees to express their opinions; raise difficulties and seriously consider difficulties of employees

e) Communicate information in a clear, coherent and consistent manner;

f) Be honest, do not hide difficulties, do not make empty promises, promise beyond ability, walk the talk;

g) Be reasonable in the assignment of work, in alignment with the ability and tasks of employees, and their job description;

h) Timely reward employees with good performance; strictly and objectively adopt disciplinary actions against those who violate the laws and regulations of SeABank;

i) Protect the honor, legitimate rights and interests of employees;

- j) Fair and equal treatment of subordinates; proactively support subordinates to solve difficulties and problems; not oppress, discriminate, or damage the honor of subordinates;
- k) Directing, orienting and training junior employees at work, especially in compliance with core values, standards, behavioral standards and the Code of Conduct;
- l) Pay attention to the employee's family condition and personal life.
- m) Do not engage in or cover for any retaliation and communicate SeABank's policy of prohibiting retaliation in the workplace

4. Principle 14: Resolving conflicts at work

When conflicts arise at work, employees need to comply with the following regulations:

- a) Transparency and listening
 - i. Employees will present their goals and expectations transparently to all concerned parties at the beginning of the conflict dialogue;
 - ii. Employees need to identify the conflict as a specific issue, not a judgment about the person;
 - iii. Employees need to listen to the opinions of colleagues; try to understand their goals, perspectives, and reasons to resolve conflicts.
- b) Awareness of problem-solving
 - i. As soon as a conflict arises, employees need to promptly discuss it with stakeholders to find a solution. Employees must not let conflicts prolong or become serious or that no necessary action is taken;
 - ii. Employees need to focus on the agreed factors, and common goals, and consider the advantages and disadvantages of each solution before resolving conflicts;
 - iii. After reaching an agreement, the authority will make a decision, and employees will not discuss the issue again and respect the decision made.
- c) Cooperation
 - i. Employees need to make an effort to resolve conflicts with other colleagues before reporting to their superiors;
 - ii. Employees need to communicate directly with colleagues about the conflict, do not talk to a third party and cause internal division.
 - iii. The employee needs to clearly explain the reasons why conflicts are non-negotiable for resolution. Any conflicting content can be negotiated to find a mutually beneficial solution for all parties and the organization.

Article 7. Responsibility at the workplace**1. Principle 15: Proactive, creative, and adaptive in the workplace**

- a) Practicing self-discipline and initiative, exploration and creativity to improve productivity, quality and work efficiency; practicing adaptability to changes in the environment and requirements in new situations; improving working methods and soft skills, contributing to the development of the bank;
- b) Do not be passive, rely on or push work to others; non-conservative, rigid, hindering innovation and creativity.

2. Principle 16: No drugs or stimulants

- a) Employees commit to maintaining a healthy and efficient working environment, not use drugs, or stimulants (alcohol, beer, etc.) during working time;
- b) Possession, use, trading, production, distribution or processing of illegal drugs or stimulants while working at SeABank are strictly prohibited.

3. Principle 17: Building a safe, friendly, healthy, and equal working environment

- a) Employees comply with the following regulations:
 - i. Gambling by employees in any form at SeABank is strictly prohibited;
 - ii. Violent acts, intentionally causing injury in any form at SeABank are strictly prohibited;
 - iii. Do not let personal problems affect work and the workplace at SeABank (debt, jealousy, disputes, chaos, fights, legal breaches, threats, revenge, etc.)
 - iv. Harassment, discrimination, racism, and gender discrimination in any form at SeABank are strictly prohibited, ensuring a fair, respectful, and healthy working environment.
 - v. Sexual harassment in any form in the workplace is strictly prohibited, including:
 - Actions, gestures, physical contact or effects that are sexual or suggestive of sex;
 - Verbal sexual harassment including face-to-face, telephone or electronic media with sexual content or sexual implication;
 - Non-verbal sexual harassment including body language, displaying, depicting sexually explicit material, or involving sexual activity in person or electronically.
 - vi. Do not store poisons, flammables, explosives, or weapons at the workplace;
 - vii. Keep the workplace clean and tidy;
 - viii. Do not smoke in prohibited zones;
 - ix. Aisles in the workplace are kept safe;

x. Save electricity, water, equipment, and supplies for the Bank

b) Employees are obligated to promptly report to their line manager or the Compliance hotline if detecting a violation of the aforementioned. SeABank ensures fairness, gender equality, no racial discrimination, ethnic discrimination in the working environment and policies on personnel, recruitment, training, equipment, and tools, and working conditions. All acts of repression and retaliation against employees who have reported/ denounced the above violations in any form at SeABank are strictly prohibited. SeABank will strengthen necessary measures to maintain a safe, friendly, healthy, and equal working environment. Violators will be handled according to SeABank's regulations and laws.

Article 8. Responsibility toward customers, other organizations, and individuals

1. Principle 18: Being customer centric

SeABank always identifies customers as the center of all activities of the Bank. Customer satisfaction is a metric of the success and quality of SeABank's operations. SeABank's Employees comply with the followings:

- a) Be honest and dedicated to customers;
- b) Employees have a professional working style, friendly, agile, and thoughtful; neat and polite clothes; serious, proper attitude, creating a positive impression, trusting customers
- c) Ensure fairness to all customers in providing services;
- d) Put efforts to bring the best products, services and experiences to customers, including providing customers with accurate, complete and clear information about SeABank's products and services;
- e) Behave fairly, transparently, and objectively in providing products and services to customers, without affecting personal interests or any other influence.
- f) Fully implement commitments and agreements between SeABank and customers; enthusiastically solve customers' problems and difficulties related to SeABank;
- g) Employees must not harass, demand, and suggest customers or people with rights and interests related to customers to receive money or any material benefits, privileges or favors for themselves or their related parties.

2. Principle 19: Fair and honest business

SeABank builds a fair and honest business environment with customers, suppliers, contractors, distributors, competitors, and employees.

Employees comply with the followings:

- a) Fairness in business, fair competition with competitors
 - Do not engage in unfair, deceptive, or abusive practices such as manipulation, concealment, misuse of confidential information, or misrepresentation of facts.

- Providing fair and equal access to goods, products, services, facilities, privileges, advantages, or accommodations and making decisions about providing these benefits based on objective criteria.
 - Do not discriminate against customers based on race, color, religion, national origin, age, sex, sexual orientation, gender identity, disability, marital status, or family status
 - Respectfully listen and acknowledge comments received from customers, partners, and those doing business with SeABank.
- b) Fairness to Suppliers, and contractors:
- i. Suppliers and contractors are individuals, organizations and businesses that provide products and services for SeABank. Employees are responsible for ensuring fair and equal treatment in the supplier selection process. Suppliers and contractors are provided with the same opportunity to participate in the bidding, selected by the process and regulations of SeABank issued from time to time.
 - ii. Employees do not suggest, do not accept money, gifts or material benefits in any form, that affects the objectivity of SeABank's selection of contractors and suppliers.
 - iii. Employees do not promise or cause suppliers to believe that they can improperly influence any procurement decision at SeABank; do not provide or suggest or give any business or service in exchange for another business activity.
 - iv. Employees are not allowed to participate in deciding jobs (executing commercial contracts, providing products and services, ...), and the performance of those jobs brings benefits directly or indirectly to employees and their related persons. Employees and their related persons are not allowed to borrow or accept credits from any supplier, contractor, or partner of SeABank with unusual incentives, which may lead to conflicts of interest.
 - v. Avoiding actual or perceived conflicts of interest in the procurement process. When a conflict of interest cannot be avoided or an accident occurs, employees must promptly report it to their direct management for appropriate handling.

3. Principle 20: Compliance with Anti-Money Laundering Regulations

Money laundering is the act of legalization of illicit funds and is not limited to cash transactions. Anti-money laundering to prevent criminal acts is the responsibility not only of credit institutions but also of governments and financial institutions globally. All SeABank employees are required to comply with applicable anti-money laundering laws and all relevant regulations and procedures of SeABank. Employees are responsible for immediately reporting to their line manager or the Anti-Money Laundering Department of SeABank via email at amlfatca@seabank.com.vn if there is any doubt or detection of money laundering activities.

4. Principle 21: Employee behavior in relationship with State agencies

Employees are obliged to comply with the regulations of State agencies in addition to complying with SeABank's by-laws. Employees need to be aware that violating the law will cause serious consequences for related organizations and individuals and negatively affect the reputation and interests of SeABank. Employees comply with the followings:

- a) To have a cooperative, polite and respectful attitude towards people working for State agencies when performing their assigned functions and tasks;
- b) Always keep a calm attitude and have the right to make satisfactory, valid and lawful requests against attitudes, wrong behaviors, or disrespect to employees and/or to SeABank;

c) SeABank employees are responsible for cooperating with State agencies when required and complying with regulations on the provision of information, documents and regulations of SeABank.

5. Principle 22: Responsible toward the community

SeABank expects its employees to demonstrate community responsibility through the following behaviors:

- a) Support those in need when they are in difficulties via charity or other activities by SeABank;
- b) Actively participate in charity and volunteer programs organized by SeABank and/or other entities;
- a) Proactively propose charitable donations and support to competent management for consideration and decision;
- b) Voluntarily obeying the law, respecting social equality, and contributing to building an equal, safe and healthy society;
- c) Always have the sense of pioneering and setting a role model to carry out good actions to contribute to building a good environment at SeABank, at home and in the community.
- f) Be spiritually and physically supportive to express gratitude to the previous generations of SeABank staff who have contributed to the development and strong growth of SeABank;
- g) Employees are not allowed to arbitrarily raise funds for charity in the name of SeABank or use SeABank's funds for charity without the consent of the competent authority.

CHAPTER III IMPLEMENTATION

Article 9. Guidance on compliance with the Code of Conduct at SeABank

1. The Legal and Compliance Division is responsible for advising and giving answers to questions about relevant provisions of the Code of Conduct.
2. In case of emergency, employees can contact the Legal and Compliance Division by phone, then the employees need to send a formal request by email or written form attached with the file/ relevant documents (if any).
3. Resolution of reports or complaints about ethics, as the case may be, shall be conducted under the principle of keeping the identity of the reporter confidential and be compliant with relevant policies and regulations at SeABank from time to time.
4. Every year, SeABank organizes mandatory training courses on the "Code of Conduct" for new employees joining SeABank and advanced training programs for management-level employees.

5. Each employee joining SeABank will be informed about the Code of Conduct and sign a commitment to comply with the Code of Conduct of SeABank according to the form MB.01.QD-PCTT/...

Article 10: Forms

MB.01.QD-PCTT/...: Commitment to comply with SeABank's code of Conduct

Article 11. Implementation

1. The Code of Conduct at Southeast Asia Commercial Joint Stock Bank takes effect from .../.../... and replaces Decision No. 1077/2018/QĐ-HĐQT dated September 26, 2018.
2. Where this Code of Conduct of SeABank is silent on an issue, applicable laws and/or relevant regulations of SeABank shall apply.
3. Amendments and supplements to this Code of Conduct shall be decided by the Board of Directors.

**ON BEHALF OF THE BOARD OF DIRECTORS
CHAIRMAN**

(signed)

LE VAN TAN