



Code of Ethics and Conduct

BIDV-SuMi TRUST Leasing Company Limited

CODE OF ETHICS AND CONDUCT

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I. CEO MESSAGE



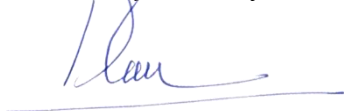
“BSL is growing, in an exceptional journey of *pursuing the betterment*. On the way to overcome the challenges of our times, we aim to succeed with certainty and prudence, develop with sustainability and harmonize the interest. We strive not only for our potential but also for the trust that customers and partners have in BSL. We are here for the benefit of our customers and partners, and for the stability of the Vietnamese financial market.

At BSL, we remind each other that creating relevant organizational culture is the foundation for a corporation to *develop sustainably* and prosperously. Under the unyielding pressure and obstacles of our daily business, our purpose to contribute to the sustainability and prosperity of our society has never been more urgent and determined.

We grasp the fact that, it takes time and requires a clear set of standards guiding everything we do to establish such idea culture. These standards must define our Company’s expectations on each Member, and most crucially, on ourselves as a unified group.

This *Code of Ethics and Conduct* lays out our Company’s *Core Value*, which guide the actions of every Member at BSL throughout the system. It stipulates apparently how we are expected to treat each other and our customers, partners and stakeholders, and our commitment to advocate social interest. Every Member at BSL is required to apply this Code in their day-to-day responsibilities and behave in a way that is consistent with it, so that ultimately, we could reach the vision of becoming your trusted partner in the Vietnam’s leasing market.

Guided by our Core Values and a deep-rooted commitment to doing everything the right way with *integrity, accountability, innovation and collaboration*, we are engaged to providing our best service to you always.”

A handwritten signature in blue ink, which appears to read 'Thieu Son', followed by a horizontal line.

Nguyen Thieu Son

Chief Executive Officer

II. OUR MISSION AND CORE VALUES AND SUSTAINABLE DEVELOPMENT

A. Purpose

To make Vietnamese Society more sustainable and prosperous through the **POWER of LEASING**.

B. Vision

To become a **TRUSTED PARTNER** in the Vietnam's financial leasing market, known and sought whenever leasing services are needed.

C. Our Mission

- ⑤ Serve leasing needs of customers with greatest level of trust and satisfaction.
- ⑤ Maximize and harmonize the interests of all stakeholders
- ⑤ Contribute to the development of Vietnamese leasing market through sharing knowledge, experience and creation

D. Core Values

- ⑤ Integrity
- ⑤ Accountability
- ⑤ Innovation
- ⑤ Collaboration

E. Sustainable Development

We generally pursue 17 Sustainable Development Goals (SDGs) of the United Nations and promoting Corporate Social Responsibilities (CSR) activities.

III. OUR COMMITMENTS

A. Ethics

1. Ethics in Business Activities

- ⑤ We have unwavering commitments to compliant, fair, ethical and responsible business conduct. Our Members make business decisions based on the best interests of the company, customers, partners and do not harm the interest of the community.

- ⓔ Our Members are not allowed to exploit the Internal Regulation of the Company and incentive programs of the Company which applying to customers/partners to seek personal benefits.

2. Integrity in Doing Business

- ⓔ When dealing with customers and business partners, our Members must always behave fairly and honestly, communicate the information or sales programs clearly and keep credibility with customers, avoid unfair or deceptive trade practices.
- ⓔ We compete fairly, with no misleading or unsubstantiated statements about competitors' services of infringement of their legal rights.
- ⓔ We comply with all applicable laws and regulations governing advertising, trade practices, competition in finance leasing activities.

B. Conduct

1. Anti-corruption

- ⓔ We and our Members commit to proper and transparent relationships with Government officials and stakeholders.
- ⓔ Our policy is to prohibit giving of money or improper benefits, including excessive services, gifts, and entertainment, to Government officials and ensures transparent relationships with them.
- ⓔ We do not give or receive money or other benefits, including excessive gifts and entertainment, to or from private business partners in order to secure an improper benefit.
- ⓔ At BSL, unsolicited gifts and entertainment that are business courtesies, designed to build relationships and goodwill maybe offered and accepted, if they are not intended to secure a particular business or personal benefit, are appropriate to the Internal Regulation of the Company, circumstances and are moderate in terms of value, frequency, and quantity.

2. Prohibition of involvement with criminal organization and individuals

- ⓔ We do our best to conduct business only with customers and business partners who have legitimate business purposes and are using legitimate funds. Therefore, we do not allow and is not involved or support criminal activities such as money laundering, terrorist financing, or any other illegal activities.

3. Anti-money Laundering

- ⓔ Money laundering is a criminal practice of filtering the proceeds of crime, or 'dirty money', through a series of transactions so that the funds are 'cleaned' in order to disguise their illegal origin.

- ⑤ We are committed to the fight against money laundering. We ensure that the Company conducts business in accordance with all legal requirements, including compliance with any currency reporting requirements.
- ⑤ We are committed to abiding by the Company's Anti-Money Laundering Regulation and the Law on Anti-Money Laundering.

4. Political and Religious Activities

- ⑤ We do not use funds or resources of our Company for personal, political, or religious activities.
- ⑤ We encourage our members to participate in the community, which may include political and/or religious activities. Our members, however, cannot use the name of BSL or membership of BSL or our own position at the Company to promote particular political or religious causes.

5. Respect in Workspace

We understand that a diverse and inclusive working environment will create conditions for each individual to be more creative and collaborative, towards an environment of greater trust and success. Therefore, we encourage open and honest communication that demonstrate respect toward your co-workers, customer, partners and others at workplace.

6. Diversity and Inclusion

- ⑤ We treat everyone equally and fairly, and makes employment decisions based on the merits and our value.
- ⑤ We value diversity and equal opportunities in our workforce.
- ⑤ We provide equal employment opportunity for all applicants and employees. In Company's employment process, our decisions are made without considering race, color, religion, national or ethnic origin, ancestry, age, disability, gender, pregnancy, marital status, sexual orientation, gender identity or expression, political belief, or any other characteristics as protected by law. These principles extend to all employment decisions, including recruiting, training, evaluation, promotion, and rewards.
- ⑤ We also have reasonable accommodations for employees and applicants with disabilities, and complies with all laws protecting disabled employees.

We respect the diverse religions and traditions of our employees. The Company strives to make reasonable accommodations, to the extent permitted by local law, for religious practices.

7. Human Rights

- ⑤ We and our Members respect human rights everywhere we work.
- ⑤ We and our Members recognize the importance of maintaining and promoting fundamental human rights everywhere we work and do business.

- ⑤ We are committed to upholding the freedom of association. All employees have the right to freely form and join groups for the promotion and protection of their employment interests to the extent permitted by law. For example, the right to establish, join, and operate Trade Unions, Youth Unions, etc.
- ⑤ We also comply with laws and regulations concerning privacy, immigration, working time, wages and hours, as well as laws prohibiting forced, compulsory and employment discrimination.

8. Anti-harassment

- ⑤ Our members are free to do our jobs without fear of harassment or bullying.
- ⑤ We aim to create a work environment that is free from discrimination, harassment, and bullying in its all form. Our members are committed not to and will not tolerate any harassing, offensive, or disrespectful behavior. Harassment could be in the form of unwelcome verbal, visual, physical or other conduct that creates an intimidating, offensive or hostile work environment.
- ⑤ Our members are expected to treat one another with respect and dignity, and to speak up if they have been a victim or have witnessed discrimination, harassment, or bullying. We do not allow retaliation against anyone for raising a complaint in good-faith of discrimination, harassment or bullying.

9. Health and safety at workplace

- ⑤ We are committed to providing a healthy and safe workplace for employees, customers, visitors and others on BSL's workspaces.
- ⑤ Our Members comply with the health and safety laws and regulations, standards, guidelines and related requirements that apply to our business.
- ⑤ We do not tolerate violence of any kind, whether explicit or implicit, physical or mental, including threatening behavior, physical intimidation, coercion and acts of physical violence.
- ⑤ Our members do not work under the influence of alcohol or any substance that may impair our own ability to work safely and do not process, sell, transfer, or distribute illegal drugs or controlled substances.

10. Respect for Privacy

- ⑤ We protect the personal information of its stakeholders.
- ⑤ Each BSL Member fully complies with privacy laws that are in effect, as well as the BSL's data privacy policy and all other relevant guidelines and procedures.

11. Protecting Customer

- ⑤ We and our Members acknowledge that the interests of customers are the interests of the Company. At BSL, we are committed to and act strongly to protect our customers' interest.

- ⓔ Protecting customer information:
- ⓔ We and our Members protect customers' information, not use it except for specified professional and regulatory purposes with the customer's approval, and not disclose it to any third party and/or unrelated our Members without permission by laws and/or customers.
- ⓔ In pursuance of the above principle, BSL will:
 - (i) clearly and publicly notify to the customers about the purpose of collecting and using information of customers before performing;
 - (ii) use the information for the purpose announced to the customer and must be agreed by the customers;
 - (iii) ensure safety, accuracy and completeness when collecting, using and transferring customers' information;
 - (iv) update by ourselves or make measures for customers to update, adjust information when it is found to be inaccurate;
 - (v) ensure that customer information is properly managed and only transfer information of customer to a third party with the consent of the customer, unless otherwise provided by law;
 - (vi) any permanent or temporary employees of the BSL, whether they are on-the-job or after leaving their posts, must sign the customer information confidentiality form.
- ⓔ Protecting customers' interests and rights:

In accordance with the provisions on the obligations of financial leasing company under the Credit Institutions Law, relevant instructions issued by the State Bank of Vietnam, and internal regulations of BSL, we and our Members will:

- (i) update the information of the products and services offered to customers clearly, concisely; and easy to understand, accurate, not misleading;
- (ii) provide appropriate and sufficient explanations to customers regarding credit transactions;
- (iii) ensure that customer inquiries, consultations, requests, complaints, and disputes are dealt with appropriately;
- (iv) ensure that conflicts of interest are properly managed and the interests of customers are not unreasonably harmed in connection with transaction by BSL.

12. Communicating with external parties

The conduct on social networks of our Members will be pursuant to our Code of Social Networks Activities from time to time.

IV. COMPLIANCE WITH THE CODE OF ETHICS AND CONDUCT

Every Member at BSL is required to comply with the Code of Ethics and Conduct and to confirm their compliance with the Code.

A. Complying with laws, regulations and standards

- ⑤ We fully comply with applicable laws, regulations, standards, codes, licenses, contractual obligations and internal regulations.
- ⑤ It is BSL Members' responsibility to read the Code thoroughly, understand its contents and comply with the Code. Following the Code will help BSL Members to get the guides of actions you should take in conducting your work.
- ⑤ In case applicable law or the Code or Internal Regulation has no stipulation on a specific issue, we follow the best practices, business culture and ethics that are generally recognized.

B. Establishing the culture of compliance

- ⑤ We and our Member are responsible to establish a culture of compliance in business and daily operation. In particular:
- ⑤ We fully and accurately acknowledge and strictly follow the law and internal Regulations of the Company in relation to assigned tasks;
- ⑤ We give the attention and necessary resources to detecting, preventing, and responding to compliance breaches.
- ⑤ BSL encourages you to speak up and to create an environment where employees can raise questions of any concern without fear of retaliation. If you suspect any breach of the Code, relevant Regulations of the Company of the applicable law, please promptly consult/report with support from relevant departments, including the LCU.

V. WHERE TO GET HELP

Help and guidance are always available. You are not expected (and should not try) to deal with complex situations on your own.

A. Focal point to get advice (Receiver)

There are several channels through which you can ask a question or seek advice regarding a suspected breach of the Code, relevant Regulation of the Company or the laws:

Line manager;

- ⑤ Head and/or Deputy Head of GAD;
- ⑤ Head of LCU and/or the person in charge of compliance;
- ⑤ MEO.

B. How to send a question of concern?

You may ask a question and/or get advice through:

- ⑤ Directly/Telephone;

- ⓔ Via email;
- ⓔ Written;

C. Process of answering a question of concern

We ensure confidentiality of the report to the extent possible by law. If you raise a legitimate concern, a limited number of people will be informed on a need-to-know basis to solve potential issues properly.

In case the issues reported shows sign(s) of serious law violation, we may choose to self-report of violation, which could result in legal actions by State authority.

D. Disciplinary action

- ⓔ Breaching the Code, relevant policies/regulations of the Company or the laws could result in disciplinary action up to and including termination of employment pursuant to each BSL's disciplinary policies and laws.
- ⓔ Please find more about our Mechanism for receiving and handling inquiries [hereby](#).
- ⓔ Contacts and Feedback
- ⓔ We welcome comments and suggestions for improving our Code. Please let us know your opinion at LCU@bslease.com.vn



If you have any questions, requests or concerns, please contact BSL Head Office with the following information:

BIDV-SuMi TRUST Leasing Company Limited

- 23rd Floor, TNR Tower Building, 54A Nguyen Chi Thanh, Lang Thuong Ward, Dong Da District, Hanoi
- (024) 39743838
- info@bslease.com.vn

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