

CODE OF PROFESSIONAL ETHICS AND CONDUCT
BIDV - SuMi TRUST LEASING COMPANY LIMITED

Table of Contents

MESSAGE FROM THE CHAIRMAN.....	3
WHO MUST COMPLY WITH THE CODE?	4
CORE VALUES.....	4
PROFESSIONAL ETHICAL STANDARDS AND RULES OF CONDUCT	5
001. STANDARD 01: COMPLIANCE WITH LAWS	5
002. STANDARD 02: COMPLIANCE WITH GENERAL RULES OF CONDUCT	9
003. STANDARD 03: RESPONSIBILITY TO THE COMPANY	12
004. STANDARD 04: RESPONSIBILITY TO COLLEAGUES.....	17
005. STANDARD 05: RESPONSIBILITY TO CUSTOMERS, PARTNERS, AND STAKEHOLDERS	20
006. STANDARD 06: RESPONSIBILITY TO THE COMMUNITY	21
GUIDELINES FOR COMPLIANCE WITH THE CODE.....	22
COMMITMENT TO COMPLY WITH THE CODE	23
INQUIRIES & REPORTING CONCERNS.....	23

MESSAGE FROM THE CHAIRMAN

Dear Esteemed Colleagues,

With the mission of contributing to a more sustainable and prosperous Vietnamese society through the power of financial leasing activities, BIDV – SuMi TRUST Leasing, Co. Ltd (“**BSL**”) firmly believes that professional ethics are the foundation of trust and sustainable development.

This Code of Professional Ethics and Conduct (the “**Code**”) represents the Core Values pursued by BSL and serves as a guiding principle for the mindset, actions, and conduct of all BSL Members – from leaders to every employee – in all circumstances and throughout the Company's development stages. The objective of the Code is to build and maintain an ethical, transparent, and respectful working environment, where every BSL member feels proud, trusted, and accountable for their own actions.

BSL's commitment to delivering the highest level of satisfaction to customers and partners is always coupled with the dedication of its personnel in preserving and enhancing professional ethical standards.

I hope that each of us shall understand, comply with, and disseminate the spirit of the Code, the Charter, and BSL's internal regulations. Compliance with the Code is not merely an individual obligation but also a collective commitment to safeguarding BSL's reputation, honor, and long-term value.

Sincerely,

Chairman of the Board of Members

WHO MUST COMPLY WITH THE CODE?

All BSL Members, comprising senior leaders (Members of the Board of Members, Members of the Board of Executives), leaders (Heads/Deputy Heads of Departments/Units at the Head Office and Directors/Deputy Directors of Branches), and all employees who have entered into employment contracts (probationary contracts, fixed-term contracts, indefinite-term contracts), service/outsourcing contracts, or trainee agreements with BSL, shall have the obligation to comply with the Code.

Excluding the Members of the Board of Controllers and Internal Auditors, who shall not be subject to the Code but shall comply with separate professional ethical standards as required by the State Bank of Vietnam¹.

For clarity, the terms “BSL,” “we,” or “us” used in the Code shall include BSL and BSL Members.

CORE VALUES

The Code is built upon four Core Values: Integrity – Accountability – Collaboration – Innovation.

These serve as a guiding compass for all BSL’s actions, decisions, and culture of conduct. Each BSL Member commits to upholding and disseminating these four values throughout their development journey with the Company.

1. Integrity

Integrity is the quality of honesty, transparency, and high standards in all behaviors, decisions, and communications, alongside a consistent commitment to and steadfast cooperation.

At BSL, integrity is demonstrated through compliance with laws, internal regulations, and professional standards; refraining from leveraging one’s position or authority for personal gain or to cause detriment to the Company.

Probity fosters trust – and trust is the foundation for BSL's sustainable development. BSL Members shall always act with honesty, practice what they preach, and uphold the principle of integrity regardless of the circumstances, whether supervised or not.

2. Accountability

Accountability signifies the spirit of proactivity, dedication, and transparency at work; the courage to admit mistakes, make corrections, and be answerable for the outcomes.

Each BSL Member shall understand that responsibility extends beyond the scope of individual work, and is intrinsically linked to the reputation, image, and sustainable development of the Company.

The spirit of accountability enables BSL to maintain discipline, efficiency, and trust

¹ As stipulated in Article 14.4 of Circular 14/2023/TT-NHNN

throughout the entire system.

3. Innovation

Innovation is the capability to seek new solutions, refine working methods, and generate added value for customers, colleagues, and the Company.

At BSL, innovation is not merely an idea but also an action – transforming mindset into tangible results, delivering efficiency, and aligning with the strategic direction.

The spirit of innovation enables BSL to continuously adapt, evolve, and take the lead in the financial leasing sector.

4. Collaboration

Collaboration means working together in a spirit of respect, support, and sharing toward common goals; listening openly, being ready to assist, and seeking balanced solutions that serve collective interests.

At BSL, collaboration goes beyond departments/units/branches, it extends to our partners, customers, and the broader community.

The spirit of innovation enables BSL to continuously adapt, renew, and pioneer in the financial leasing sector.

PROFESSIONAL ETHICAL STANDARDS AND RULES OF CONDUCT

001. STANDARD 01: COMPLIANCE WITH LAWS

Compliance with the laws of the Socialist Republic of Vietnam, international law where applicable and all legal obligations is the foundational principle underlying all activities of BSL and BSL Members.

This is not merely a mandatory requirement but also a manifestation of professional ethics, and the culture of integrity and transparency – values BSL is committed to pursuing.

BSL Members shall be responsible for acting within the framework of the law, and shall regard this as a core professional ethical standard and the honor of a finance professional.

The Rules of Conduct set forth hereinafter provide specific guidance on the prevention of and fight against bribery, corruption, money laundering, fraud, tax evasion, and other violations of the law.

1. Rule 01: Anti-Bribery and Corruption

(i) Commitment

BSL is firmly committed to fostering a culture of integrity and transparency, and strictly rejects all forms of bribery, corruption, or abuse of position for illicit gains.

BSL strictly prohibits all acts of giving, soliciting, or accepting bribes, brokerage of bribery, embezzlement of assets, or any other corrupt practices, whether performed directly or indirectly, through money, gifts, or any other benefits.

(ii) Expected Conduct

- Shall maintain transparent and appropriate relationships with State authorities, partners, and relevant parties.
- Shall only offer or accept gifts, hospitality, or other benefits when they are of a reasonable social nature, of appropriate value, are not intended to influence business decisions, and strictly comply with the law and BSL's internal regulations.
- Shall promptly and truthfully report to the internal competent authority upon detection or suspicion of corrupt practices or bribery.

(iii) Prohibited Conduct

- Must not offer, accept, suggest, or mediate any money, gifts, services, or benefits intended to pursue illicit gains.
- Must not conceal, legitimize, or pretend not to see any acts of bribery or corruption.
- Must not exploit your position within BSL to pursue personal gains or benefits for a third party.

2. Rule 02: Anti-Money Laundering, Counter-Terrorist Financing, and Counter-Proliferation Financing

(i) Commitment

BSL is committed to full compliance with all legal provisions on Anti-Money Laundering (AML), Counter-Terrorist Financing (CTF), and Counter-Proliferation Financing (CPF).

In its capacity as a credit institution, BSL and BSL Members are fully aware of their responsibility to prevent, detect, and promptly report acts of abusing the financial system for illicit purposes, thereby contributing to the assurance of national financial security and the Company's reputation.

(ii) Expected Conduct

- Shall strictly comply with the procedures for Customer Identification and Due Diligence and transaction screening to accurately identify customers, related parties, and the purpose of the transaction.
- Shall monitor, detect, and promptly report suspicious or unusual transactions in accordance with legal requirements and BSL's internal regulations.
- Shall maintain transaction records and documents for the period stipulated by

law.

- Shall fully participate in training programs and awareness campaigns regarding AML/CFT/CPF.

(iii) Prohibited Conduct

- Must not execute, collude in, or ignore any act or sign of money laundering, terrorist financing, or proliferation financing.
- Must not assist customers or third parties in concealing, converting illegal funds, or intentionally misrepresenting the nature of a transaction.
- Must not disclose information regarding the reporting of suspicious transactions to customers or any unauthorized party.
- Must not use BSL's accounts, funds, or facilities for illegal purposes.

3. Rule 03: Anti-Fraud and Crime

Fraud is the act of willful deception intended to obtain an illegal benefit or cause detriment to an organization or other individuals. Fraud may be perpetrated by individuals or groups and shall be prosecuted in accordance with the law.

Criminal offense is an act that violates criminal law and causes harm to society, an organization, or an individual.

(i) Commitment

BSL is committed to maintaining legal and transparent business operations and requires all BSL Members to adhere strictly to the prevention of and fight against fraud and criminal offenses.

(ii) Expected Conduct

- Shall only conduct business with customers and partners that have legitimate objectives and lawful sources of funds.
- Shall conduct necessary due diligence to identify and mitigate the risks of fraud or criminal involvement.
- Shall immediately report to the competent authority upon detection or suspicion of any fraudulent act or criminal offense.

(iii) Prohibited Conduct

- Must not perpetrate, collude in, abet, or turn a blind eye to any fraudulent act.
- Must not engage in business activities, transactions, or cooperation with any organization or individual that exhibits signs of criminal activity.
- Must not conceal, disregard, or misreport any fraudulent or criminal acts.

4. Rule 04: Compliance with Conflict of Interest Regulations

(i) Commitment

BSL Members are committed to upholding the highest standards of integrity and transparency in all their activities.

The Company establishes an internal control framework to ensure a clear segregation of duties and responsibilities in all transactions and business processes, preventing and controlling conflicts of interest.

No individual shall have full control over an entire transaction or process. Likewise, no individual shall concurrently be assigned tasks that may create conflicts of interest.

BSL and BSL Members shall act to protect the interests of customers and partners, safeguard the interests of BSL from undue harm from conflicts of interest and avoid any actions or situations that may cause or give rise to conflicts between personal interests and those of BSL.

All conflicts of interest, whether actual or potential, shall be proactively disclosed and handled in accordance with BSL's internal regulations.

(ii) Expected Conduct

- Shall perform duties honestly, objectively, and independently, protecting the interests of customers, partners and BSL. Shall avoid any actions or situations that may cause or give rise to conflicts of interest between them.
- Shall proactively identify and disclose any potential or actual conflicts of interest in accordance with BSL's internal regulations.
- Shall seek guidance or approval from the internal competent authority before engaging in any external activities, projects, or employment that may affect their obligations to BSL.

(iii) Prohibited Conduct

- Must not misuse position, authority, information, or assets of BSL for personal gains or for the benefits of a third party.
- Must not fail to disclose or deliberately conceal situations that may give rise to a conflict of interest.
- Must not participate in, invest in, or work for any organization or individual whose activities compete with BSL's interests without prior approval.
- Must not supervise, evaluate, or make decisions regarding recruitment, remuneration, payments, or other benefits involving relatives, friends, or persons with close personal relationships.

5. Rule 05: Compliance with Tax Laws

(i) Commitment

BSL is committed to fully fulfilling its tax obligations as stipulated by the law, in an honest, transparent, and timely manner.

BSL strictly prohibits all acts of tax evasion, tax fraud, or exploitation of tax policies for undue profit. Tax compliance is not only a legal obligation but also a key factor securing BSL's reputation and sustainable development.

(ii) Expected Conduct

- Shall declare, submit, and finalize tax obligations honestly, fully, on time, and in strict compliance with the law.
- Shall maintain transparent vouchers, ledgers, and accounting-financial records that truthfully reflect BSL's transactions.
- Shall cooperate and provide full and timely information when the tax authority or competent body requests an audit or inspection.
- Shall proactively report any errors or suspected acts of tax fraud detected within the scope of work.

(iii) Prohibited Conduct

- Must not engage in tax evasion, tax fraud, incorrect declaration, or concealment of information related to tax obligations.
- Must not intentionally misstate or create false documents with the aim of reducing tax obligations or profiting from tax policies.
- Must not abet, conclude in, disregard, or fail to report violations of tax law when detected within the scope of work.

002. STANDARD 02: COMPLIANCE WITH GENERAL RULES OF CONDUCT

Compliance with the general rules of conduct is the foundation of BSL's culture, reflecting the professionalism, respect, and accountability of every BSL Member in all internal and external interactions.

Every professional action, word, and decision shall reflect the spirit of “Integrity – Accountability – Collaboration – Innovation.”

6. Rule 06: Respect in the Workplace & Privacy**(i) Fostering a Respectful, Civil, and Equitable Workplace**

BSL is committed to establishing a working environment where all BSL Members are treated equitably, with respect, and are afforded opportunities for development.

Each BSL Member shall be responsible for maintaining a professional, collaborative, and respectful attitude in all behaviors, communications, and

professional decisions.

BSL shall not condone discrimination, harassment, bullying, or retaliation in any form whatsoever.

BSL and BSL Members shall also have the obligation to protect the privacy of colleagues, customers, and partners, and shall comply with legal regulations and BSL’s internal regulations on the confidentiality of personal information.

(ii) Expected Conduct

- Shall treat colleagues, customers, and partners with respect in all communications, conduct, and professional decisions.
- Shall contribute to building a civil, open working environment that fosters collaboration, innovation, and diversity.
- Shall comply with legal regulations and BSL’s internal regulations on privacy and personal information confidentiality.
- Shall promptly raise concerns upon witnessing or being a victim of harassment, discrimination, or bullying.

(iii) Prohibited Conduct

- Must not engage in any form of harassment, discrimination, bullying, or disrespect towards others in the workplace.
- Must not disclose or use without authorization the personal information or private data of colleagues, customers, or partners.
- Must not disregard, overlook, or retaliate against individuals who raise concerns or make good-faith complaints regarding harassment or discrimination.

7. Rule 07: Health, Safety & Risk Prevention

(i) Ensuring a Safe and Healthy Working Environment

BSL is committed to maintaining a safe, healthy, and human-respecting working environment to protect the physical and mental well-being of all BSL Members, customers, and partners.

Each BSL Member shall be responsible for complying with applicable laws, professional standards, and internal regulations on occupational safety, fire prevention and fighting, emergency response, and risk management in the course of work.

BSL shall not tolerate any acts of violence, threat, coercion, or any acts that jeopardizes the health and safety of others.

(ii) Expected Conduct

- Shall strictly comply with regulations and guidelines on safety, occupational health, prevention, and emergency response.
- Shall maintain a physically and mentally sober state, sufficient capacity to work safely, and shall not be impaired by alcohol, stimulants, or illegal substances in the extent to prevent from maintaining them.
- Shall immediately report any detected safety hazard, occupational accident, or act that threatens the health and safety of others in the workplace.
- Shall contribute to fostering a clean, safe, health-friendly and environment-friendly working environment.

(iii) Prohibited Conduct

- Must not engage in any acts of violence, threat, coercion, or cause physical or mental harm to others.
- Must not work or operate equipment while under the influence of alcohol, stimulants, or addictive substances that impair the ability to maintaining a physically and mentally sober state, sufficient capacity to work safely.
- Must not possess, sell, use, or distribute narcotics, illegal substances, or hazardous materials in the workplace.

8. Rule 08: Information & Data Security

(i) Compliance with information and data security

Each BSL Member shall strictly comply with legal regulations and BSL’s internal regulations on confidentiality, and shall maintain the obligation of confidentiality throughout their employment at BSL and even after the termination of employment.

BSL's internal information and confidential information (“Confidential Information”) includes, but is not limited to: strategies, projects, plans, unpublished financial data, professional documents, technology systems, customer – partner information, and any other information identified or designated as confidential.

(ii) Expected Conduct

- Shall only provide or share Confidential Information when approved by the internal competent authority or as required by a lawful request from a State authority.
- Shall take all necessary safety measures when issuing, storing, using, transmitting, and disposing of Confidential Information.
- Shall ensure that the working area and Information Technology systems are controlled to prevent unauthorized access.
- Shall comply with confidentiality regulations when using network systems, passwords, identifiers, software, and technological equipment.

(iii) Prohibited Conduct

- Must not disclose Confidential Information to unauthorized individuals or entities or to those who do not have a need-to-know basis as stipulated.
- Must not install, modify, or illegally copy unauthorized software on internal systems.
- Must not discuss Confidential Information in public places, on forums, social networks, over the phone, or by any means that poses a risk of leakage.

9. Rule 09: Accuracy in Records and Figures**(i) Ensuring the Accuracy and Integrity of Information**

Information, records, and data are the critical basis for all BSL decisions.

Each BSL Member shall be responsible for ensuring that the information and data within their scope of work are complete, accurate, timely, and truthfully reflect the business and financial status of BSL, as well as information from customers, and partners.

(ii) Expected Conduct

- Shall provide, record, and maintain information, records, and data honestly, accurately, and timely.
- Shall proactively report to the internal competent authority immediately upon detection or suspicion of errors, fraud, or material misstatements in records or data.
- Shall cooperate with internal control units, internal auditors, and independent auditors to ensure transparency and compliance.

(iii) Prohibited Conduct

- Must not falsify, manipulate, alter, delete, or conceal information or data in any manner whatsoever.
- Must not intentionally provide or disseminate inaccurate information or data, causing misstatement in reports or affecting management decisions.
- Must not engage in any acts that may cause detriment to the transparency, reputation, or legitimate interests of BSL, customers, or partners.

003. STANDARD 03: RESPONSIBILITY TO THE COMPANY

Responsibility to the Company is the foundation of professional ethics and corporate culture at BSL.

Each BSL Member shall act with honesty, dedication, and professionalism, placing the Company's interests, for the goal of BSL's sustainable development and long-term

reputation.

Upholding ethics, complying with regulations, and safeguarding BSL's reputation, assets, and image is how each BSL Member demonstrates loyalty and contributes to fostering a corporate culture of probity, accountability, and trustworthiness.

10. Rule 10: Loyalty to BSL & in BSL's Interests

(i) Duty of Loyalty

Each BSL Member is a representative of the Company's credibility, reputation, image, interests, and Core Values. Therefore, loyalty to BSL is a fundamental and perpetual responsibility of every BSL Member.

BSL Members at all levels shall exercise their assigned duties and authorities honestly and in the best interests of the Company; shall not exploit their status or position, nor use the Company's information, know-how, business opportunities, or assets for personal gains or to cause detriment to BSL's interests².

(ii) Expected Conduct

- Shall prioritize BSL's interests and reputation in all professional decisions and actions.
- Shall act consistently to protect, consolidate, and enhance BSL's credibility, image, and brand.
- Shall maintain the confidentiality of BSL's information and intellectual property, and shall use them solely for legitimate and lawful business purposes.
- Shall regard BSL as a shared home, jointly building a cohesive and trusting working environment.

(iii) Prohibited Conduct

- Must not intentionally violate regulations, professional procedures, or cause detriment to BSL's legitimate interests.
- Must not disclose, share, or reveal BSL's confidential information, data, or trade secrets.
- Must not make statements, take actions, or disseminate information that adversely affects BSL's credibility, image, or brand.
- Must not use BSL's position, resources, or information to serve personal gains or benefits of a third party.

11. Rule 11: Compliance with Internal Regulations

(i) Obligation to Comply

² As stipulated in Article 14.4 of Circular 14/2023/TT-NHNN

Each BSL Member shall be responsible for understanding, updating, and strictly adhering to the policies, regulations, procedures, guidelines and so on issued by the Company.

Compliance with internal regulations is the foundation of a professional culture and a means of protecting the credibility, interests, and sustainable development of BSL and of BSL Members themselves.

(ii) Expected Conduct

- Shall proactively update and acquire internal regulations promulgated by the Company in each period. Shall fully participate in internal training sessions on internal regulations organized by the functional Departments/Units.
- Shall comply with professional procedures, internal regulations, and professional ethical standards.
- Shall report and seek advice when encountering situations where regulations are unclear or where there is a risk of violating internal regulations.

(iii) Prohibited Conduct

- Must not intentionally violate, ignore, or avoid the implementation of internal regulations.
- Must not abuse your position, authority, or personal influence to compel other BSL Members to breach internal regulations.
- Must not engage in any conduct contrary to assigned functions and duties or that negatively impacts BSL's credibility and reputation.

12. Rule 12: Ensuring Professional Competence

(i) General Principle

Each BSL Member shall perform their work based on professional competence and experience as committed, and with the highest degree of responsibility.

Professional competence is demonstrated by BSL Members performing duties on time, ensuring quality, and maintaining transparency in every task.

(ii) Expected Conduct

- Shall make decisions and perform work based on verifiable, clear, and authentic information and data.
- Shall be accountable for the accuracy, completeness, and timeliness of information, records, and work results.
- Shall proactively cultivate professional competence, skills, and operational knowledge to best complete assignments.

(iii) Prohibited Conduct

- Must not make unfounded, emotional, or non-authentic decisions.
- Must not be irresponsible in verifying, authenticating, and archiving related records and documents.
- Must not work superficially, lack preparation, or delegate responsibility to others.

13. Rule 13: Reasonable Use & Protection of Company Assets**(i) General Principle**

All BSL assets, including tangible assets (such as equipment, facilities, financial funds, etc.) and intangible assets (such as intellectual property, trade secrets, reputation, information, data, etc.), shall be used reasonably and safeguarded by BSL Members.

BSL Members shall only be permitted to use BSL assets for legitimate work purposes, and must not use them for personal purposes or any other non-work-related purposes.

(ii) Expected Conduct

- Shall use BSL assets for their intended purpose, economically, and efficiently.
- Shall maintain the confidentiality of internal confidential information, including intellectual property, trade secrets, development plans, pricing, customer data, and personal data.
- Shall protect and preserve BSL's value, credibility, and reputation.
- Shall fully return BSL's documents, data, and assets upon termination of employment or when requested.

(iii) Prohibited Conduct

- Must not use BSL's assets, confidential information, or data for personal purposes or for a third party without authorization.
- Must not disclose, copy, or use BSL's confidential information contrary to regulations, including after the termination of employment.
- Must not lose, damage, or waste BSL's assets, equipment, or resources.

14. Rule 14: Proper Use of Email, Internet, and Information Systems**(i) General Principle**

BSL Members shall use the Company's email, internet, and information systems safely, securely, and responsibly, solely for legitimate work purposes.

The use of these systems shall be fully complied with BSL’s internal regulations, and relevant laws.

BSL reserves the right to monitor, inspect, and record activities on the information systems to the extent permitted by law, in order to ensure the Company's security and data integrity.

(ii) Expected Conduct

- Shall use BSL’s email, internet, and information systems for legitimate work purposes.
- Shall comply with information security regulations, system safety, and relevant laws.
- Shall immediately report any detected risks, cybersecurity incidents, or unauthorized use of the information systems.

(iii) Prohibited Conduct

- Must not use BSL’s email, internet, and information systems for personal purposes or any illegal activities.
- Must not install, download, or share unauthorized software or files that pose a risk of harm to the system.
- Must not disclose or disseminate BSL’s confidential information or data through insecure channels.

15. Rule 15: External Communication

(i) General Principle

BSL and BSL Members are committed to demonstrating respect and honesty in all external communication activities.

Conduct on social media and other communication platforms shall be complied with BSL's internal regulations as promulgated from time to time.

All contact, public statements, or provision of information to media agencies and the public shall only be made when authorized, permitted by the Company, and in strict compliance with BSL's regulations and the law.

(ii) Expected Conduct

- Shall comply with the spokesperson and communication regulations approved by BSL.
- Shall maintain a respectful, honest, and professional attitude in all interactions with customers, media agencies, and relevant parties.
- If compelled to respond in an exceptional circumstance, shall clearly affirm

that the statement is a personal view, not on behalf of BSL, and shall ensure that the content does not cause misunderstanding as the official view of the Company.

(iii) Prohibited Conduct

- Must not unilaterally contact, make public statements, or provide information to media agencies, the public, or on social media on behalf of BSL without authorization.
- Must not make statements or comments on social media or public forums that may damage BSL’s credibility or image or cause misunderstanding regarding BSL’s official position.
- Must not disclose internal confidential information, trade secrets, or information not authorized for external release.

004. STANDARD 04: RESPONSIBILITY TO COLLEAGUES

BSL fosters a trusting, professional, and respectful working environment, where every BSL Member is treated fairly, heard, and is afforded the opportunity to maximize their capabilities.

BSL's corporate culture is shaped by collaboration, mutual support, and mutual respect among colleagues – factors that generate collective strength and sustainable work efficiency.

To nurture this culture, each BSL Member shall be responsible for implementing the following rules:

16. Rule 16: Work Relationships with Colleague

(i) General Principle

BSL Members shall respect, cooperate with, and behave civilly toward colleagues; shall maintain a spirit of cooperation, openness, mutual support, and prioritize collective efficiency.

(ii) Expected Conduct

- Shall respect and trust colleagues; communicate openly, transparently, and listen to dissenting opinions based on reasoning and evidence.
- Shall work effectively in teams, complete assigned tasks, and learn and share experiences to jointly enhance overall competence.
- Shall encourage and support the professional development and spirit of learning among colleagues.
- Shall respect colleagues' privacy, and must not disclose personal information or spread rumors.

- Shall limit borrowing money or assets from colleagues to avoid conflicts of interest and maintain professionalism in the workplace.

(iii) Prohibited Conduct

- Must not discriminate, launch personal attacks, or cause internal division.
- Must not intentionally obstruct, undermine the reputation, or discredit the contribution of colleagues.
- Must not spread unverified information, personal rumors, or matters of interpersonal conflict.

17. Rule 17: Work Relationships with Direct Supervisors

(i) General Principle

BSL Members shall adhere to labor discipline, respect the assignments of management, and maintain a collaborative and constructive spirit in all exchanges.

(ii) Expected Conduct

- Shall strictly comply with assigned duties; if a directive is deemed inappropriate, shall proactively provide feedback and report for management review. Should the management maintain the directive, BSL Members shall still fully implement it but shall have the right to reserve their opinion and report to a higher level.
- Shall maintain a respectful and receptive attitude, and communicate appropriately in all situations.
- Shall only visit the private residence of a line manager when invited within the framework of collective activities or upon a formal work requirement.

(iii) Prohibited Conduct

- Must not fail to comply with a lawful directive from management or intentionally delay or evade responsibility.
- Must not engage in flattery, seek favor, or pursue illicit gain in the relationship with a superior.
- Must not visit the private residence of a line manager or offer gifts or gratuities for personal purposes.

18. Rule 18: Work Relationships with Subordinate BSL Members

(i) General Principle

BSL line managers shall be responsible for setting an example, guiding, protecting, and facilitating the development of subordinate Members in a spirit of fairness, integrity, and professionalism.

(ii) Expected Conduct

- Shall lead by example in work, discipline, and compliance with BSL regulations and the law.
- Shall orient, train, and support subordinates, especially in adhering to BSL's Core Values and the Code.
- Shall resolve difficulties, ensure fair treatment, and protect the legitimate rights and interests of subordinates.
- Shall resolve reports and complaints regarding professional ethics with confidentiality, objectivity, and in accordance with established procedures.

(iii) Prohibited Conduct

- Must not abuse your position to exert pressure, pursue illicit gains, or show favoritism.
- Must not suggest, demand, or exert pressure regarding gift-giving, and must not accept gratuities from subordinates, except for gifts of small value on special occasions that are non-corruptive in nature, as stipulated by BSL from time to time.
- Must not accept or solicit gifts or material benefits from subordinates.
- Must not ignore, cover up, or retaliate against whistleblowers or complainants regarding professional ethics.

19. Rule 19: Conflict Resolution in the Workplace**(i) General Principle**

BSL Members shall resolve work-related conflicts in a spirit of cooperation, respect, transparency, and aiming for common goals. Conflicts shall be viewed as opportunities to improve work processes and quality, not as personal clashes.

(ii) Expected Conduct

- Shall communicate frankly, honestly, and transparently when conflicts arise, focusing on the specific issue rather than personal judgment.
- Shall maintain active listening, respect colleagues' viewpoints, and understand the reasons, intentions, and purposes of relevant parties before providing feedback.
- Shall proactively discuss and seek solutions immediately upon the emergence of a conflict, without allowing it to persist or escalate.
- Shall focus on common ground, jointly assess the pros and cons of each option to achieve mutual consensus.
- Shall comply and demonstrate solidarity once a resolution has been approved

by the competent authority, without further discussion or causing division.

- Shall strive to resolve conflicts directly between the relevant parties before reporting to a higher level.

(iii) Prohibited Conduct

- Must not avoid, delay, or allow conflicts to persist, thereby affecting work efficiency.
- Must not gossip, involve others, or "form factions" during the conflict resolution process.
- Must not have disrespectful attitudes, launch personal attacks, or impose opinions.
- Must not fail to comply with an agreed-upon decision or engage in acts that misrepresent the content of the exchange or the resolution outcome.

005. STANDARD 05: RESPONSIBILITY TO CUSTOMERS, PARTNERS, AND STAKEHOLDERS

BSL places customers and stakeholders at the center of all operations.

Customer satisfaction is a critical measure of service quality and BSL's credibility.

Each BSL Member represents the Company's image, and therefore shall behave honestly, dedicatedly, and professionally in all relations with customers, partners, and other stakeholders.

To implement this standard, BSL Members shall comply with the following rules:

20. Rule 20: Always Prioritizing Customers

BSL shall always prioritize customers. Customer satisfaction is the measure of BSL's success and operational quality. Therefore, each BSL Member shall comply with the following responsibilities towards customers, partners, and other stakeholders:

(i) General Principle

BSL Members shall always regard customers as the focus of all activities. Serving customers with dedication, transparency, and responsibility is the foundation for BSL's sustainable development.

(ii) Expected Conduct

- Shall be honest, respectful, and professional in all communications and transactions with customers, and partners.
- Shall provide information on BSL's products and services fully, accurately, clearly, and timely.

- Shall strictly fulfill all commitments, contracts, and agreements with customers; shall proactively support and promptly resolve arising issues or complaints.
- Shall maintain absolute confidentiality of information related to customers and partners; shall only share information when authorized or upon request by a competent authority in accordance with the law and BSL's internal regulations.
- Shall demonstrate a spirit of collaboration and receptiveness, aiming to build long-term, trustworthy, and mutually beneficial relationships.

(iii) Prohibited Conduct

- Must not be arrogant, indifferent, or disrespectful towards customers or partners.
- Must not provide misleading information, cause misunderstanding, or cause detriment to the interests of customers and BSL.
- Must not disclose, exchange, or use customer, or partner information for personal purposes or for benefits of a third party.
- Must not suggest, demand, or accept money, gifts, or material benefits from customers, or partners, in any form whatsoever, except for gifts of symbolic value or customary hospitality for work purposes as stipulated by BSL.
- Must not exploit your position for illicit gains or show favoritism toward customers, or partners for personal reasons.

006. STANDARD 06: RESPONSIBILITY TO THE COMMUNITY

BSL aims for sustainable development not only in its business operations but also through actively contributing to society.

Each BSL Member is a representative of the Company in the community, responsible for promoting humanitarian values, sharing, and respect for the living environment.

BSL's spirit of corporate social responsibility (CSR) is demonstrated through community support, environmental preservation, and appreciation for previous generations – who contributed to building the foundation for the Company's development.

To implement this standard, BSL Members shall comply with the following rules:

21. Rule 21: Living and Working Responsibly Towards the Community

(i) General Principle

BSL Members shall demonstrate their spirit of social responsibility through practical actions, contributing to the establishment of a civilized, benevolent, and sustainably developing community.

(ii) Expected Conduct

- Shall actively participate in charitable activities, environmental protection, cultural & social programs, projects promoting education and healthcare, etc., organized by BSL or other organizations.
- Shall provide support and share difficulties with colleagues and community members in need, commensurate with their own capacity and conditions.
- Shall proactively propose social contribution initiatives or activities, and charity programs for BSL's review and implementation.
- Shall preserve and promote BSL's image as friendly, responsible, and trustworthy within the community.
- Shall express gratitude, respect, and appreciation for the preceding generations of BSL Members – those who have contributed to the Company's development.

(iii) Prohibited Conduct

- Must not be indifferent to, avoid, or diminish social responsibility, or fail to participate in community activities organized by BSL without a valid reason.
- Must not use BSL's name to call for, organize, or conduct social activities, fundraising, or charity outside of established regulations.
- Must not engage in any conduct or make any statement that negatively affects BSL's image or credibility within the community.

GUIDELINES FOR COMPLIANCE WITH THE CODE

During the course of employment, should a BSL Member encounter a situation where the appropriateness of an action or decision is uncertain, they shall exercise careful consideration and follow the guidance below to ensure all actions comply with the law, ethical standards, and BSL's Core Values.

1. Self-Test Questions Before Making a Decision

When considering an action or decision, BSL Members shall ask themselves the following:

- Does this decision comply with the current law?
- Is this decision consistent with the Code of Professional Ethics and Conduct, as well as BSL's internal policies and regulations?
- Does this decision safeguard the credibility, reputation, and legitimate interests of BSL and its Parent Banks?
- Among the available options, is this the most ethical, fair, and transparent choice?

- If I were in another person's position, would they be willing to make the same decision as me?
- Would I feel secure and comfortable if my decision were publicly disclosed, such as in the press or internally within the Company?

If all answers are "Yes," BSL Members may proceed with the decision.

If any answer is "No," the action or decision must not be taken, as it may pose legal or ethical risks or harm BSL's reputation.

If the answer is "Uncertain," BSL Members shall seek counsel before acting.

2. Procedure for Uncertainty

- Shall consult with the direct supervisor for guidance or advice, except when the situation involves the supervisor themselves.
- If the matter remains unclear after consulting with the direct supervisor, the BSL Member may contact a higher-level manager, the Legal & Compliance Unit, or a relevant Functional Department/Unit for formal advice.

COMMITMENT TO COMPLY WITH THE CODE

The commitment to comply with the Code is a mandatory condition for all BSL Members upon recruitment, appointment, as well as during the annual performance appraisal process.

BSL Members are obliged to confirm that they have read, understood, agreed to, and committed to comply with the entire content of the Code, using the form provided by the Company.

INQUIRIES & REPORTING CONCERNS

1. Obligation to Report

Departments, Units, Branches and individuals shall be responsible for promptly reporting to the interenal competent authority upon detection of acts violating the law, BSL's internal regulations, and the Code³.

2. Reportable Misconduct

Misconduct refers to acts that:

- Violate the law (e.g., fraud, tax evasion, embezzlement, money laundering, etc.).
- Violate BSL's policies, regulations, or procedures (e.g., providing false information to State authorities, failure to report conflicts of interest, bribery, aiding or concealing violations, etc.).

³ As stipulated in Article 14.4 of Circular 14/2023/TT-NHNN

- Conceal or condone any act of misconduct.

3. Reporting Procedure

Upon detecting or suspecting an act of misconduct, BSL Members shall report immediately according to the following order:

- Direct line manager.
- If reporting to the direct line manager is not feasible or appropriate, report to a higher-level manager, the Legal & Compliance Unit, the General Affairs Department, or a relevant Functional Department/Unit.

4. Methods and Confidentiality

BSL Members may report via:

- In-person meeting;
- Telephone call;
- Email or written document.

BSL Members have the right to request identity confidentiality.

If the report is made orally (in-person or by phone), the reporting person should confirm it in writing or via email to ensure accuracy and record-keeping.

The recipient of the report is responsible for confirming receipt of the information, documenting the content, maintaining the confidentiality of the reporting person's identity, and taking appropriate steps for handling the matter.

5. Protection of Whistleblowers

BSL is committed to absolutely protecting the identity of the reporting person and strictly prohibits all acts of harassment, retaliation, or detrimental action against BSL Members when they report violations or suspected misconduct in good faith.

6. Contact Information

General Affairs Department

Hotline: (024) 3928 4666 | Ext: 0106

Email: GAD@bslease.com.vn

Legal and Compliance Unit

Hotline: (024) 3928 4666 | Ext. 0163

Email: LCU@bslease.com.vn