

VIETNAM OIL AND GAS GROUP  
**PETROVIETNAM CAMAU FERTILIZER JOINT STOCK COMPANY**



**CODE OF BUSINESS CONDUCT**  
**(COC)**

*(This translation version is issued for reference only)*

<b>01</b>	<b>22/8/2022</b>	<b>HR Division</b>	<b>Legal and Compliance Division</b>	<b>BOD</b>
<b>Rev.</b>	<b>Date issued</b>	<b>Compiling</b>	<b>Reviewing</b>	<b>Approving</b>

## TABLE OF CONTENTS

MESSAGE FROM THE BOARD OF DIRECTORS .....	1
VISION, MISSION, CORE VALUES .....	2
CHAPTER I: GENERAL RULES .....	3
Article 1. Scope of regulation and subjects of application .....	3
Article 2. Explanation of words .....	3
CHAPTER II: COMMITMENTS .....	4
Article 3. Committing to Integrity and Trust .....	4
Article 4. Complying with Vietnamese and international laws .....	4
Article 5. Respecting human rights.....	5
Article 6. Accepting cultural differences .....	6
Article 7. Non-discrimination .....	6
Article 8. Creating equal opportunities .....	7
Article 9. No retaliation .....	7
Article 10. Anti-harassment .....	8
Article 11. Combating violence .....	9
Article 12. Not abusing addictive substances .....	9
Article 13. Ensuring health and safety .....	10
CHAPTER III: THE APPLICATION OF BEST PRACTICES.....	10
Article 14. Non-disclosure .....	10
Article 15. Intellectual property protection.....	11
Article 16. Anti conflicts of interest .....	12
Article 17. Anti corruption and bribery .....	13
Article 18. Not abusing gifts, entertainment, and greetings .....	13
Article 19. International trade controls .....	14
Article 20. Financial integrity .....	14
CHAPTER IV: RESPONSIBILITY CATEGORISATION .....	15
Article 21. Social communication activities .....	15
Article 22. Business decision making practice .....	17
Article 23. Social and environmental responsibility.....	19
CHAPTER V: ENFORCEMENT.....	21
Article 24. Misconduct report, investigation and handling .....	21
Article 25. Implementation .....	21
Article 26. Enforcement.....	22

**MESSAGE FROM THE BOARD OF DIRECTORS**  
**PETROVIETNAM CAMAU FERTILIZER JOINT STOCK COMPANY**  
**(PVCFC)**

Code of Business Conduct (COC) is a set of guiding principles in all business activities of PVCFC. This is the basis for PVCFC to develop programs, policies as well as decision making to ensure the correctness in the journey to realize the mission and vision that PVCFC has chosen.

The Code of Business Conduct always has a strong influence on PVCFC's reputation, success and sustainable development. Moreover, being applied in daily work practice, the Code of Business Conduct also helps PVCFC towards higher management standards, and at the same time contributes to the orientation of the staff to behave and interact more professionally and faster, contributing to the formation of a sustainably competitive advantage for PVCFC.

In addition, compiling, issuing and implementing the Code of Business Conduct in daily operations will play a very important role in shaping the business ethics that PVCFC is aiming for, and at the same time having a direct impact on PVCFC's business objectives. In fact, there is a lot of concrete evidence that violations of business ethics affect organizations' reputation, reduce their stock prices and profits, and significantly impact on workers in those organizations.

The Code of Business Conduct provides specific guidance on how to behave as an employee of PVCFC when interacting with any stakeholders. The Board of Directors believes that this important Code of Business Conduct will help all employees of PVCFC know how to behave properly and in accordance with the characteristics of PVCFC in the journey to realize their goals/ responsibilities.

The Board of Directors kindly request all individuals to read and ensure compliance with this Code of Business Conduct.

**CHIEF EXECUTIVE OFFICER**

**CHAIRMAN OF THE BOARD**

*(Signed)*

*(Signed)*

**Van Tien Thanh**

**Tran Ngoc Nguyen**

## VISION, MISSION, CORE VALUES

### PVCFC'S VISION:

**“BECOME THE LEADING ENTERPRISE IN THE REGION  
IN THE FIELD OF FERTILIZER PRODUCTION AND TRADING”**

### PVCFC'S MISSION:

**“CONTRIBUTE TO SECURE FERTILIZER SUPPLY AND FOOD  
SECURITY WITH PIONEERING NUTRIENT SOLUTIONS FOR CROPS”**

### PVCFC'S CORE VALUES:

Core values are guidelines for the attitudes and behaviors of PVCFC people. All efforts to conquer and develop must be based on the foundation of fully preserving four core values: **“PIONEERING - ACCOUNTABILITY - CARING - HARMONY”**.

1. **PIONEERING:** Being ahead, being the trailblazer, leading, proactively devoting to work with high creativity and the willingness to accept any challenge.

2. **ACCOUNTABILITY:** Taking ownership of a task and being responsible for its success or failure. Working with an attitude that focuses all your mind on the quality of the assigned work, in the stages of preparation, implementation and completion. No blaming on others; initiating to take responsibility and being humble.

3. **CARING:** Serving others with all your mind and heart to help address their difficulties and burdens.

4. **HARMONY:** The balance, the concord with each other on the values of PVCFC and each stakeholder, including: harmony of both responsibilities and rights; harmony between PVCFC and employees (internally); harmony between PVCFC and clients and other stakeholders (externally).

**CHAPTER I:  
GENERAL RULES**

**Article 1. Scope of regulation and subjects of application**

1. Scope of regulation

The Code of Business Conduct regulates PVCFC's codes of conduct, ethical standards and business commitments to stakeholders, including employees, farmers, agents, suppliers, customers, authorities and local people,...

2. Subjects of application

a. The Code of Business Conduct is applicable to all officers (all members of the BOD, Supervisory Board, Executive Board) and all employees of PVCFC.

b. The Company encourages all suppliers and other stakeholders to apply the Code of Business Conduct.

**Article 2. Explanation of words**

In this Code of Business Conduct, except for common terms as defined by law, the following terms and abbreviations will be construed as follows:

<b>No.</b>	<b>Term</b>	<b>Abbreviation</b>	<b>Meaning</b>
1.	Company	PVCFC	Is Petrovietnam Camau Fertilizer Joint Stock Company
2.	Managers / Management levels		Are those who hold the position of head/deputy manager, foreman/deputy foreman or higher at PVCFC
3.		CEO	Is Chief Executive Officer

## **CHAPTER II: COMMITMENTS**

### **Article 3. Committing to integrity and trust**

The business success of PVCFC depends on the trust that PVCFC has from its stakeholders, including employees, farmers, agents, suppliers, customers, authorities and local people, etc. To earn this trust, PVCFC is committed to demonstrating integrity and trustworthiness. All thoughts, actions and words of PVCFC employees are consistent and follow the core values of PVCFC as well as the contents of the Code of Business Conduct.

The Code of Business Conduct helps us make the right decisions and take the right actions, no matter where we work or what we do.

At PVCFC, we must:

1. Understand and adhere to the Code of Business Conduct, thereby becoming a role model for colleagues, business partners, clients, etc.

2. Be responsible for reporting violations of the Code of Business Conduct that you know or come across. Employees who fail to comply with the Code of Business Conduct or fail to report violations shall be subject to disciplinary action or even termination of employment.

3. All managers (including BOD) are responsible for modeling ethical behaviors. Besides, they need to help employees understand, instill and apply the Code of Business Conduct, encourage employees to share when they have questions or concerns, and monitor and deal with employee violations as appropriate.

4. When considering any decision or action, each PVCFC employee needs to ask himself/herself:

a. Will this decision or action follow the Code of Business Conduct and help PVCFC build trust?

b. Will it help PVCFC achieve sustainable success in the long term?

c. When making this commitment, am I sure I can make it to the end?

d. The only way to build trust is through answering “yes” to the above questions and demonstrating integrity and trustworthiness every day.

### **Article 4. Complying with Vietnamese and international laws**

PVCFC upholds the spirit of law compliance - that is, all members of a country or territory must respect and strictly abide by the laws of that country or territory. Once the law has been promulgated, the whole society must take it as a standard to behave accordingly, regardless of social class and status.

PVCFC is a member of the international business environment, so we must comply with domestic and international laws, rules and regulations, and fulfill our social responsibilities where we do business.

At PVCFC, we must:

1. Regularly learn and update regulations, procedures related to our field of operation and report, propose to adjust activities to ensure compliance with the law.
2. Be responsible for understanding and complying with the regulations and laws of Vietnam, as well as relevant international laws and regulations.
3. Speak up and prevent violations of the applicable laws and regulations.
4. When there is a conflict between different laws and regulations that apply to your job or you are concerned about whether a certain action is legal, you need to contact the Legal and Compliance Division or the other channels according to policies that PVCFC has issued for guidance.

### **Article 5. Respecting human rights**

PVCFC is committed to a work environment that respects human rights, in compliance with the Universal Declaration of Human Rights. In all conduct activities inside and outside the organization, We must ensure that we do not discriminate according to:

- Race
- Religion
- Beliefs
- Gender
- Sexual orientation
- Social status
- Nationality
- Age
- Appearance
- Health
- Marital status
- Disability

We respect people in constantly researching and developing products to bring good benefits to people. We make constant efforts to create safe products that do not cause harm to users and minimize the harm to the environment during the production and transportation of products to consumers.

PVCFC's policy is to stop cooperating and not accepting cooperation with any partners if knowing that they treat their workers in unacceptable ways including exploitation, abuse, or violations of human rights, violations of labor laws.

At PVCFC, we must:

1. Respect, listen and communicate openly with others in a spirit of understanding and respect for their personal and professional views.
2. Behave appropriately to create and/or contribute to the creation of a fair, respectful work environment.

3. Control and promote PVCFC's partners in respecting human rights, especially issues related to child labor, gender equality and labor law as well as issues related to the environment.

4. Create communication channels that ensure employees are heard, shared, and inspired.

5. Not be biased and prejudiced on matters related to the views, appearance or attitudes of colleagues.

### **Article 6. Accepting cultural differences**

PVCFC recognizes and respects the history, culture and customs of each region, country and anywhere we do business. We accept cultural differences and this will make our corporate culture more diverse and inclusive.

We do not accept culturally prejudiced behaviors that lead to discrimination, not having the most optimal and beneficial cooperation for the parties involved.

At PVCFC, we must:

1. Continue to learn and understand different cultures in how they see things and behave.

2. Understand the values that govern the actions of individuals from different cultures and thereby choose the most optimal, appropriate and beneficial way of working for each party.

3. Fuse differences by creating the right balance between curiosity and gratitude. Learn to question and observe to respect and accept cultural differences.

4. Keep an open mind, avoid the stereotype that someone from a certain culture is also a representative of that culture. Respect and understand them as unique individuals and thereby enrich the work environment and make the most of their strengths.

5. Avoid imposing your own personal views. Once becoming aware of cultural differences, you may find that certain characteristics of some cultures make you uncomfortable. It is important to resist the tendency to judge. Instead, make a conscious effort to understand the point of view of others.

### **Article 7. Non-discrimination**

PVCFC maintains a work environment free of discrimination.

We all deserve to work in an environment where we are treated equally and with respect. PVCFC is committed to creating such an environment to bring out the full potential in each individual, thereby directly contributing to the success of PVCFC's business. We can't waste anyone's talent.

PVCFC is an equal employer. We affirm, commit and act to provide a workplace free of discrimination of any kind. Any employee who feels discriminated against should report the incident to his/her immediate supervisor or the Human Resources Division or the other channels according to policies that PVCFC has issued.

At PVCFC, we must:

1. Treat others equally and with respect at all times.



2. Address and report discriminatory behaviors and comments.
3. Promote teamwork and employee participation; encourage employees to express diverse, multi-dimensional perspectives.
4. Arrange work appropriately for employees with different needs, capabilities, and/or obligations.
5. Be open and listen when receiving constructive feedback about our own behaviors.

### **Article 8. Creating equal opportunities**

PVCFC is committed in implementing the policy of equality, promoting for progress. PVCFC ensures that divisions are encouraged to implement an equality policy that covers the following aspects:

- Recruitment and Selection
- Work arrangement and employee promotion
- Equality monitoring
- Complaints and claims handling

We give every employee or candidate equal opportunity in recruitment, training, salary, benefits, internal rotation and career development. We consider individual skills, experience and capabilities in making decisions and ensuring fairness and equity.

We ensure fairness, equality and transparency in working with our partners (contractors, agents, clients) and other stakeholders.

At PVCFC, we must:

1. Conduct recruitment and selection in a manner that ensures equal opportunity for all candidates based on knowledge, skills and capabilities.
2. Create equal opportunities in assigning work, developing and promoting employees to achieve both organizational goals and personal development goals.
3. Enforce and monitor equality in work and in interactions with PVCFC's stakeholders.
4. Comply with established employee complaints and claims handling policies to ensure the opportunity to speak up and monitor the implementation of equality.
5. Listen to and resolve issues with PVCFC's stakeholders in the spirit of equality and win-win.

### **Article 9. No retaliation**

PVCFC is committed to creating a work environment that promotes open and ongoing communication relating ethics, compliance or other relevant issues.

PVCFC prohibits any form of retaliation against employees who raise issues, ask questions, participate in investigations, or refuse to engage in suspected misconduct including (but not limited to):

- Discrimination or harassment

- Fraud
- Unethical behavior
- Failure to comply with internal regulations of PVCFC
- Actual or potential threats to PVCFC employees or public health and/or safety
- Violation of state laws and regulations
- Other illegal or inappropriate actions or policies.

Employees can report the issue to their direct supervisor and/or higher management levels or the Human Resources Division or the other channels according to the policies that PVCFC has issued.

At PVCFC, we must:

1. All employees are encouraged and entitled to share their legitimate concerns without fear of retaliation.
2. Maintain confidentiality of all claims. Allegations of retaliation will be investigated and dealt with appropriately.
3. Receive reports, complaints and seriously conduct a full investigation within the scope of responsibility and avoid affecting the person reporting the incident..
4. Take disciplinary action against employees who have repeatedly submitted false or unreasonable complaints and are proven to have intentionally lied, fabricated evidence, acted maliciously or for personal gain. This helps ensure employees act in goodwill for PVCFC.
5. Communicate this policy to PVCFC's partners and encourage them to report or question behaviors that they find business, policy, or ethically inappropriate.

#### **Article 10. Anti-harassment**

PVCFC strives to create and maintain a working environment where everyone is treated with kindness and respect inside and outside the organization. PVCFC's work environment is characterized by mutual trust and is free from intimidation or harassment of any kind.

All employees, regardless of their position, are secured and must comply to ensure that prohibited conduct does not occur. Appropriate disciplinary action will be taken against any employee who engages in workplace harassment. Based on the severity of the misconduct, disciplinary action may include verbal or written warning, suspension or termination of employment.

Managers and supervisors who intentionally allow or tolerate harassment and fail to immediately report such misconduct to their upper levels or the Human Resources Division or the other channels according to the policies that PVCFC has issued, are subject to discipline.

Harassment includes:

- Verbal or nonverbal harassment showing aversion or disrespect towards an individual or group because of their nationality, race, color, religion, age,

gender, sexual orientation, pregnancy, appearance, disability or marital status.

- Verbal sexual harassment.
- Nonverbal sexual harassment.
- Physical sexual harassment.

At PVCFC, we must:

1. Be careful in interactions, make sure interactions are polite, respectful, pleasant, and not coercive.
2. Understand and comply with PVCFC's anti-discrimination and anti-harassment policies that apply inside and outside the organization.
3. Immediately report harassment or seeing others being harassed to your managers or the Human Resources Division or other the channels according to the policies that PVCFC has issued.
4. Never tolerate or participate in any form of harassment. (e.g. physical, sexual, psychological, verbal or any other harassment).
5. Deal with reported harassment promptly and properly in accordance with the scope of responsibility.

#### **Article 11. Combating violence**

Each of us is responsible for our own safety and that of our colleagues at work.

The workplace does not allow violence and abuse. Threats, aggression, or abuse towards colleagues or others in the workplace will not be tolerated.

At PVCFC, we must:

1. Have proper behaviors and words to avoid escalating and intense conflicts that lead to violence in the workplace.
2. Observe and act to separate partners and clients who have hostile behaviors towards PVCFC's employees.
3. Managers observe and resolve employee conflicts to avoid violence.
4. Not tolerate and has the right to refuse to serve clients who are violent or hostile towards PVCFC's employees.
5. Immediately report potential risks of violence due to conflict or discrimination to your managers or the Human Resources Division or other the channels according to the policies that PVCFC has issued.

#### **Article 12. Not abusing addictive substances**

PVCFC is committed to creating a safe working environment for all employees. We must fulfill our responsibilities and perform our duties professionally at work (or anywhere else) when conducting business.

Clients as well as the public expect us to provide professional and quality services without being under the influence of drugs, alcohol, or other stimulants that might interfere with job execution and evaluation.

Unauthorized use, sale, preparation, distribution, possession or manufacture of illegal substances is strictly prohibited and subject to disciplinary action.

At PVCFC, we must:

1. Not come to work under the influence of alcohol or drugs.
2. Observe and report behaviors of possessing or using substances that may interfere with work or professional performance.

### **Article 13. Ensuring health and safety**

PVCFC ensures to always create a safe working environment; regularly review and improve the working environment, strictly manage all risks in order to minimize the risks of occupational accidents and occupational diseases during the working process of employees.

PVCFC provides a full range of safety equipment suitable for each type of work and training for the safety of PVCFC's employees and assets as well as takes action immediately and effectively in the event of an emergency or accident from operation.

PVCFC strictly complies with the provisions of the law and relevant regulations on occupational safety, health and safety.

At PVCFC, we must:

1. Participate seriously in training activities related to occupational safety, health and safety at the workplace.
2. Actively observe and propose ideas, immediately report unsafe hazards in the workplace.
3. Comply, cooperate and remind colleagues to follow safety regulations, work procedures and prevent occupational diseases.
4. Inspect machinery and equipment at the workplace according to the issued occupational safety standards.
5. Be alert to safety hazards in the workplace. Prevent and immediately report to managers violations of occupational safety and health.

## **CHAPTER III: THE APPLICATION OF BEST PRACTICES**

### **Article 14. Non-disclosure**

PVCFC commits to the non-disclosure of all confidential information which is in the possession of both the Company and our business partners.

Such confidential information mentioned hereinabove includes but not limited to the followings: revenue and profit, payrolls, bonus plan, client portfolio, recruitment/ marketing/ business development plan, intellectual properties, new features of products/ services, research and development ideas, potential mergers and acquisitions or investment, ect.

We commit to properly archiving information and authorizing accessibility in compliance with the PVCFC's regulations and the Law. The non-disclosure of information recipients must extend to non-relevant individuals, including family members and friends, and public discussion settings, including elevators, restaurants, airplanes, ect.

At PVCFC, we must:

1. Be fully aware that confidential information, as defined hereinabove, is the asset of the Company and our stakeholders.

2. Protect such pre-defined confidential information accordingly to the Company's Regulations on Confidential Documents Management and Usage and commit to non-disclosure of such pre-defined confidential information to any other third party. All utilization of such pre-defined confidential information and/ or exclusive ones must not be the purpose of any personal gain and/ or against the Company's benefits.

3. Handle the intellectual properties as well as pre-defined confidential information of clients, partners, and stakeholders to the highest level of consideration and in accordance with the applicable Laws and Company's regulations.

4. Disclosure is permitted only when authorized by PVCFC or required by the Law. Otherwise, either might it be intentional or unintentional, which could result in severe consequences toward the Company and/ or our stakeholders, disclosing such pre-defined confidential information will be subjected to disciplinary punishment.

5. Identify whether the information in possession is confidential and/ or exclusive or not, ect. Any inquiries in regard to this content will be raised to direct manager(s) and/ or other functional body that oversees the Company's Regulation on Confidential Documents Management and Usage for further instruction.

### **Article 15. Intellectual property protection**

We are responsible for identifying, managing and protecting the Company's Intellectual Property which includes patents, brands, copyrights, trade secrets, inventions, manufacturing processes and blueprints. Such Intellectual Property mentioned herein extends to those that are created during/ after the working process and, thus, will not be used personally.

Any intellectual property rights of other enterprises will not be disrespected and/ or, improperly and/ or wrongfully exploited.

We will only search and collect information from any official sources and will not allow improper act of searching and collecting trade secrets and/ or confidential information of other enterprises.

At PVCFC, we must:

1. Comply with the applicable Laws and Company's regulations on non-disclosure and intellectual property rights. Ensure the maintenance of the confidentiality of trade secrets and other information of the Company and of any other third party.

2. Prior to official announcement, as employee, avoid disclosing any inventions, documents, and/ or information that might be characterized as Intellectual Property of the Company and our relevant partners.

3. Take no part in any activities that violate intellectual property rights on the premise and/ or by utilising the equipment of the Company and/ or via any other methods which are in relation to the Company's activities.

4. If you want to collect information on competitor(s), search from official sources which include websites, media, published trading or legal documents, ect.

5. Monitor and report activities that violate the Company's Intellectual Property Rights Compliance. Serious misconducts and violation will be subjected to disciplinary punishment as stipulated in the Company's Regulations.

### **Article 16. Anti conflicts of interest**

Conflicts of Interest, either actual or potential, arise when the benefit of an individual and/ or of their family member(s) interferes with or clearly obstructs the benefit of the Company. We must avoid Conflicts of Interest because they often make it difficult for us to perform daily operations objectively and to make wise decision. In the event of Conflicts of Interest, either actual or potential, all employees are accountable to instantaneously reporting to their direct manager(s).

Below are examples of possible Conflicts of Interest:

- You or a close family member of yours is working for or providing advice to the Company's competitors, suppliers, contractors, agencies, or clients.
- The ownership of benefit from the Company's competitors, suppliers, contractors, agencies, or clients.
- The receipt of discounts, commissions, or incentives from the Company's competitors, suppliers, agencies, or clients.
- The usage of the Company's assets or unofficial information without Company's authorization.
- Personal gains from any Company's transactions.
- The recruitment of or supervision on a close family member or individual of close relationship.

At PVCFC, we must:

1. Always put the benefit of the Company in front of personal gains. We are responsible for taking no part in any activities or relationships that might impact or are under the impression of impacting the capability of making unbiased and objective decision in daily operations.

2. Never abusively exercise one's position (authority) or use the Company's assets or information without Company's written approval for personal gains.

3. Report any suspected or predictable cases of Conflicts of Interest or personal gains to supervisor.

4. Identifying the possibility of a conflict of interest is not oftentime easy. Any speculation of an activity or a relationship, which might lead to Conflicts of Interest,

should be brought to the attention of direct manager(s), or Legal and Compliance Division or the other channels according to policies that PVCFC has issued.

**Article 17. Anti corruption and bribery**

The Company’s success is defined by the quality of products and services, not ever by any illegitimate or unethical behaviours. PVCFC will not forgive any behaviours of corruption or bribery.

There is a clear distinction between government bribery and non-government bribery stipulated in the Law of some countries. There is none in PVCFC. All types of corruption and bribery to any individuals, in any settings, by any methods will be forbidden.

At PVCFC, we must:

1. Not ever offer, promise to offer, or accept any valuable items for the acquisition or retention of any clients, or to gain an unfair advantage.
2. In daily operations, be fully aware of any proposed bribery, either an offer or an acceptance, and do not take them. The consequences of such corruption and bribery behaviours might be the highest level of severity – for individual in particular and for PVCFC in general. In case bribery is the sole option to acquire or retain a certain client, give it up - those clients are not valued or desired business partners of PVCFC.
3. Take no part in any corruption and bribery behaviours.

**Article 18. Not abusing gifts, entertainment, and greetings**

Presenting gifts and entertainment is common practice of amiability in order to strengthen business relationships. However, in case such practice might impact or is under the impression of impacting the making objective and unbiased decision of one recipient, it is the violation of the Article 16 Anti Conflicts of Interest and Article 17 Anti Corruption and Bribery as mentioned hereinabove.

At PVCFC, we must:

1. Be accountable to thoroughly considering offering or accepting any gifts or forms of entertainment. Do not put PVCFC or self in a possible awkward situation in case such gift or form of entertainment were made public. Below are helpful guidelines:

<p><b>Only offer or accept gifts or forms of entertainment under the following circumstances:</b></p>	<p><b>Do not offer or accept gifts or forms of entertainment under the following circumstances:</b></p>
<p>a. Clear intent, to strengthen healthy relationship.</p> <p>b. Humble and moderate.</p> <p>c. Bear memento value such as a pen, a t-shirt, a calendar, a planner, or a bag with PVCFC’s or partners’ logo.</p> <p>d. Infrequently.</p>	<p>a. Unclear intent, to impact a business decision.</p> <p>b. Luxurious and extravagant.</p> <p>c. Bear monetary value or equivalent such as gift voucher, shares, stocks.</p> <p>d. Frequently.</p>

<b>Only offer or accept gifts or forms of entertainment under the following circumstances:</b>	<b>Do not offer or accept gifts or forms of entertainment under the following circumstances:</b>
e. Recipient feels completely comfortable sharing with colleague(s) or when publicly known.	e. Recipient does not feel comfortable sharing with colleague(s) or when publicly known.

2. Identifying the appropriateness of a gift or a form of entertainment is not oftentimes easy. Any speculation of the validity and appropriateness of a gift or a form of entertainment should be brought to the attention of direct manager(s), or Legal and Compliance Division or the other channels according to policies that PVCFC has issued.

### **Article 19. International trade controls**

PVCFC commits to following all rules and regulations relating to Trade Controls – including but not limited to export, import and international financial transactions – of countries with which PVCFC is doing business. Violation of those rules and regulations might threaten the future business of PVCFC globally, and/ or lead to trade sanction or criminal prosecution even. Specifically, PVCFC will:

1. Screen transactions to identify whether any individuals or entities are on restricted or sanctioned business list.
2. Take no part in boycott activities that are not approved or supported by Vietnam and/ or other countries.
3. Store all international transactions adequately and accurately as the evidence of compliance when needed.
4. If you have any questions or concerns in regard to international trade controls, bring them to the attention of your direct manager(s), or Legal and Compliance Division or the other channels according to policies that PVCFC has issued.

### **Article 20. Financial integrity**

Financial integrity helps maintain existing trust from shareholders, the government, clients, and other stakeholders. In a stark contrast, inaccurate financial information will eliminate such existing trust and lead to penalties. Thus, PVCFC commits that all information inside official financial reports and documents is adequate, honest, accurate, timely and comprehensible, as well as in compliance with the applicable Laws, the Generally Accepted Accounting Principles and the stock market’s regulations.

Below are examples of how PVCFC’s Board of Directors and all employees apply Financial Integrity in daily operations:

1. Timely record all revenues and expenses in the accounting periods in accordance with the Generally Accepted Accounting Principles.
2. Adequately and accurately open and keep accounting books and records that accurately reflect PVCFC’s financial situation and performance. Do not misrepresent or forge for any reason.



3. Always comply to the PVCFC's regulations, procedures on Services and Procurement as well as Sales Management.

4. Ensure that all Company's payments or uses of funds are carried out in accordance with the applicable Laws and Company's regulations.

5. Develop and maintain suitable internal control and audit systems.

6. Periodically perform independent audit fairly and objectively. Openly cooperate and honestly and adequately provide external auditor or investigator, as well as not improperly interfering, manipulating, and coercing their works.

7. Display integrity in the process of selecting independent auditing agency and of performing internal audit.

8. If you have any questions or concerns in regard to financial integrity, bring them to the attention of your direct manager(s), or Legal and Compliance Division or the other channels according to policies that PVCFC has issued.

## **CHAPTER IV: RESPONSIBILITY CATEGORISATION**

### **Article 21. Social communication activities**

#### **1. Social media announcement alignment**

Countries around the world are extending their operations to social media, government activities are also being moved from paper-based to computer screen. Disputes and conflicts on social media are no longer theoretical issues, rather than common and more practical gradually.

The promulgation of social media Code of Business Conduct will help all PVCFC's employees align their posts of information relating to the Company and ensure that all social media announcements of the Company are from the right source and consistent across all platforms. Additionally, the Code of Business Conduct ensures that all behaviours of each and every employee on their own social media platform will not impact the reputation and activities of the Company.

PVCFC ensures that all latest information on business policies, activities, and relationships with stakeholders is updated via the Company's website, periodical press releases, and stakeholders' websites. All official announcements of PVCFC are published via website, written documents, and other proper means of communication.

PVCFC ensures that all information posted on social media are constantly controlled from essential steps: create, process, design, build and communicate. All units that carry out steps must be in accordance with the applicable Laws and Company's regulations. PVCFC forbids all behaviours that violate Vietnam Cybersecurity Law.

All requests for announcement and information provision from any news outlets must follow the Company's Regulation on News Outlet Announcement and Information Provision as promulgated.

## **2. Who are PVCFC's Social Communication legitimate spokesperson and authorised spokesperson(s)?**

Below are the Company's communication legitimate spokesperson and authorised spokesperson(s):

a. CEO.

b. Deputy CEO on communication under CEO's power of attorney. Such power of attorney must bear the information of the authorized spokesperson, including fullname, position, contact number, and email address, and will be published in form of written document and on the website.

c. In some cases, CEO can authorize a specific individual to act as a legitimate spokesperson to provide only designated information which must be specifically stated in the power of attorney.

d. Only CEO can issue the power of attorney for a designated individual.

e. When an information provision requires expertise factor, legitimate spokesperson or authorized spokesperson will assign relevant divisions/ departments to participate and share their respective expert opinion.

## **3. PVCFC's Social Communication authorized spokesperson(s) criteria?**

a. Authorized spokesperson must be PVCFC's contract employee who holds clear stance and exudes honest and objective attitude when making an announcement.

b. In terms of expertise and responsibility, authorized spokesperson must have a thorough understanding on the designated matter as well as Vietnam's press release regulations.

c. In terms of responsibility, both legitimate spokesperson and authorized spokesperson(s) are accountable to information being provided to stakeholders and are held responsible in front of the Company's Board of Directors, Board of Management and the Law.

d. In case of any inquired information that are beyond authorized coverage, both legitimate spokesperson and authorised spokenperson(s) will not answer immediately and will delay for further instruction. Legitimate spokesperson reserves the right to withhold information that violates the laws and policies of the Communist Party and the Government; and contains business secret of PVCFC and matters that are beyond their responsibility.

## **4. The usage of PVCFC's images**

a. PVCFC forbids any usage or posts of the Company's name, logo, images, components, designs, and other information, all of which has not been officially announced on press releases, advertising documents, bidding invitation letters, and webpage (including displaying products at any trade fair and/ or inside the premise of business partners), without prior written approval.

b. All PVCFC's employees can post information that are aligned with the Company's development policies (with a strict exception of acting on behalf of or representing the Company to provide information on any social media platforms)

c. Especially, do not disclose any Information on any projects and/ or new products relating to the Company’s competitive strategy. All PVCFC’s employees must be aware of the speed of information in modern age and the serious consequences as the result of inaccurate application.

## **Article 22. Business Decision Making Practice**

PVCFC’s Code of Business Conduct reflects the desire of all employees for aligned behaviours toward all stakeholders in business environment. However, our daily operations bring about situations that require each relevant employee to thoroughly consider for the most appropriate course of action. In reality, not all solutions being considered and chosen can be clearly distinguished whether they are “RIGHT” or “WRONG”.

However, in order to ensure all PVCFC’s employees to have foundation for analyzing, considering and making the best decision in every situation for which relevant employees are responsible, in this Code of Business Conduct, PVCFC strongly recommends that all PVCFC’s employees who are responsible for solving problems regarding the Company’s business activities will fully comprehend the following principles and process for the most appropriate course of action.

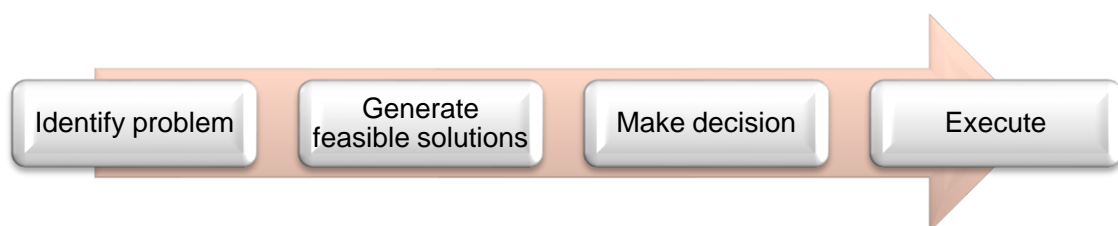
### **1. Decision-Making Principles**

As a person who has the final responsibility for the occurred problem, upon making decision, must strictly comply to the following 5 Decision-Making Principles:

- a. I will always be honest and fair in all decision that I am accountable for;
- b. I made sure the sufficiency of necessary information and data to be analysed so that the root cause of the problem is identified, feasible solutions are generated, and optimal decision is made,
- c. I always make sure of the compliance of the applicable laws as well as the Company’s regulations, procedures, processes, and policies,
- d. I commit that all my decisions are made in alignment with the Company’s core values and with the contents as clearly stated in this Code of Business Conduct,
- e. I am willing to be held accountable for all my decisions and reports to be sent to my superior in the manner of sufficiency and accuracy in accordance with the Company’s Regulations and/ or upon request.

### **2. Problem-Solving and Decision-Making Process**

PVCFC strongly recommends that all PVCFC’s employees will strictly follow these steps when solving problems for which they are responsible in order to maintain the character of appropriateness.



***Flowchart: Problem-Solving & Decision-Making Process at PVCFC***

### Step 1. Identify problem

As a problem emerges, identify the typical distinction of the actual current situation. Collect and analyse information and assess the impact level and potential associated risk(s) which might affect the Company's reputation, brand, and/ or economic benefits.

Then, clearly specify such problem (including: name? typical distinction? past, existing, and future impact?).

### Step 2. Generate feasible solutions

This step includes the following possible actions that can be taken:

- (1) Seek for instruction from superiors; or
- (2) Consult outside expert(s); or
- (3) Explore collective intelligence from stakeholders; or
- (4) Invite subordinates' ideas/ perspectives;...

Subsequently, analyse and determine the root cause of such problem and generate feasible solutions in the scientific and effective manner.

### Step 3. Make decision

Optimal decision will not be made if only one feasible solution is generated in step 2. This step holds the fundamental of basing on the feasible solutions (2 at the very least) in order to analyse, review, and consider choosing the optimal one in compliance with the 5 Decision-Making Principles as stated hereinabove.

Upon making the decision and to make sure its appropriateness, problem solver(s) should, on their own accord, answer the following questions:

- (1) Is my decision illegal, immoral, and/ or incompliant with any professional standards?
- (2) Is the integrity of mine, the Company, and/ or clients/ partners being damaged?
- (3) Is my decision expressing the unbiased, just, and honest manner of mine?
- (4) Is my decided course of action going against the Company's core values?
- (5) Is any part of my decided course of action not aligned with third party/ as well as remaining stakeholders?
- (6) Do I treat others the way that I expect them to do the same to me?
- (7) Is my decision threatening someone's life and/ or reputation?
- (8) Will my decision be shared with or hidden away from (fear of embarrassment) my family, friends and/ or colleagues?
- (9) Will my and/ or the Company's reputation/ credibility be damaged if the decided course of action is known or made public via press release or media platforms and social network?

### Step 4. Execute

No decision results in expected outcome without effective execution which requires scientific management.

Execution results also must go through certain assessment for any applicable necessary adjustment (this will ensure the actual appropriateness and optimal effectiveness).

Additionally, the improvement of creativity and standardization of execution is necessary. This serves the purpose of preventing the recurrence of the solved problem and/ or the occurrence of similar problem in the future.

## **Article 23. Social and environmental responsibility**

### **1. Social Responsibility and Community Service**

PVCFC always encourages our employees to thrive for good citizenship for the benefit of the country, to actively contribute to the growth of the society, to respect the Law and to live responsibly.

PVCFC commits that PVCFC's activities and policies are towards the benefits of consumers and the social community. All efforts of PVCFC are to contribute to the development of a more civilized and better society. All our business activities are associated with the well-being of our consumers on the aspect of physics, chemistry, and biology. All our action plans aim to increase consumer awareness of high-quality fertilizers which support the plants growth and protect the environment, and, in turn, help farmers with sustainable and effective cultivation.

PVCFC always has policies for social welfare funds and to accompany with the growth of local education which aims for the development and improvement of workforce for the society and community. We support and protect the learning rights and responsibility of the people. All individuals reserve the rights to learn and improve their knowledge for personal development. We honor all individual and collective contribution for the sustainable and lasting growth of our society.

PVCFC holds high respect to all social organizations. Every organization or individual reserves the rights to participate in any legal social entities, to act on free will, to express personal opinions, and to fairly join any debates. We commit to protecting the child rights, labor rights, woman's reputation and dignity, and to opposing to any acts of violence and/ or abuse against children, workers; any forms of harassment; and any bad business practices that go against Vietnam's customs and traditions.

### **2. Environmental Protection and Sustainable Development**

PVCFC thrives to sustainable development (safer for the environment and community) via increasing the activities of cutting-edge technology research and application. We constantly develop, maintain, and improve our existing Management System in accordance with ISO, COSO, Best Management Practices, etc.

PVCFC commits to protecting the human health, natural resources and the environment. We ensure that every employee is clearly instructed to apply our environmental principles on their daily operations. We also commit to always being truthful to our experiment and assessment reports in the manner of objectivity and independence; and to securing the safety of the following potential harmful activities to the environment:

a. Radiation protection within the premise of PVCFC and the external environment.

i. PVCFC commits to being held accountable for ensuring the radiation protection to all our operations and production, and the available remedies for any caused damages.

ii. PVCFC closely collaborates with specialized Department, Division to control, check, timely detect potential risks, and constantly implement activities that aim for safe handling radioactive sources.

iii. PVCFC continuously improves our technological capability for safe and effective handling radioactive sources.

b. Chemical Safety

i. PVCFC promulgates specific policies on chemicals consumption in production and operations.

ii. PVCFC strictly follows safety chemicals storing procedure in order to prevent potential risks of dangerous chemicals that might damage the living environment and the ecosystem.

iii. PVCFC only uses proper laboratory equipment that ensures the safety of users and the environment. In production, all our employees regularly undergo training and coaching on the capability of safe and effective handling chemicals, the full comprehension of the properties of chemicals with which they come in contact, and the responsiveness to chemical emergencies.

iv. PVCFC constantly improves our technological capability for handling chemicals in compliance with Vietnam Environmental Protection Law.

c. Biodiversity Conservation

i. PVCFC ensures the biodiversity conservation in all operations and production. We also ensure that our production activity causes no harm to the living, growing, and developing environment of local flora and fauna.

ii. PVCFC ensures that all our products cause no harmful effect to any plants and/ or animals.

iii. PVCFC always supports all media activities on biodiversity conservation and strongly opposes any actions that damage our ecosystem.

iv. Protecting our water, soil, and air

v. PVCFC constantly practices water conservation, soil protection and air pollution prevention in all our operations.

vi. PVCFC commits to applying technological innovation to all our products for a greener and cleaner living environment.

vii. PVCFC supports the efficient and effective exploration of soil and water resources as well as the prevention of air pollution. Our wastewater is always thoroughly treated prior to being disposed of.

PVCFC commits to strictly taking disciplinary action against employees who over-exploit and/ or cause any harmful effect to the resources mentioned hereinabove.

In addition, we proactively take actions to reduce our negative impact to the environment as well as taking advantage of our influence to join forces with other enterprises for the reduction of industrial impacts. We resolutely will not cooperate with individuals whose actions cause harmful effect the natural resources, environment, and ecosystem.

## **CHAPTER V: ENFORCEMENT**

### **Article 24. Misconduct report, investigation and handling**

1. Types of disciplinary action (include but not limited to):

- a. Warning.
- b. Reprimand (to be recorded on employee's profile).
- c. Probation.
- d. Suspension.
- e. Termination.
- f. Compensation for caused damages or loss to be imposed.
- g. Possible civil or criminal lawsuit (in accordance with the applicable laws).

2. PVCFC holds high respect to all misconduct reports. Investigation will be conducted to determine whether this Code of Business Conduct is violated and suitable handling action to be taken. In case an investigation on the violation of this Code of Business Conduct demands the participation of any employees, such individual is required to cooperate and answer all inquiries in the manner of sufficiency and honesty.

3. When an employee detects a misconduct, they can report via the channels according to policies that PVCFC has issued. Depending on the nature of each case, PVCFC will have particular lead of investigation, handling, and procedure in accordance with the applicable laws and/ or Company's regulations. All parties in relation to the misconduct are responsible for honest cooperation in order for the accuracy and objectivity of the investigation and handling result. The investigation and handling final result will be reported to the Board of Directors and Board of Management of the Company.

### **Article 25. Implementation**

1. All employees are responsible for full comprehension and being in compliance with the Company's Code of Business Conduct and Policy, and for maintaining the Company's ethical culture in daily operations and decision-making.

2. The Board of Directors is in charge of the engagement, supervising the execution of this Code of Business Conduct.

3. CEO organizes this Code of Business Conduct implementation of all PVCFC's Divisions/ Offices/ Subsidiaries. During the implementation, CEO is responsible for submitting any contents that are not in accordance with the change of

relevant legal normative documents; or the change of Company's business operations; or of business environment, etc. to the Board of Directors for prompt update and amendment if any.

4. Managers at all levels are accountable for:

a. Ensuring that all team/ unit members have read and comprehended this Code of Business Conduct and have gone through necessary training/ coaching of such Code of Business Conduct.

b. Establishing an open work environment so that all team/ unit members feel comfortable to voice their concerns and worries and preventing any retaliatory actions to be taken upon whistleblower(s).

c. Delving into any wrongdoings that are detected or under suspicion.

d. Celebrating (rewarding) integrity.

e. Encouraging ethical decision-making.

f. Seeking supports in handling and reporting arisen problems.

5. Channel(s) of guidance and instruction

PVCFC always encourages all employees to question and voice their detection or suspicion of any unethical and/ or illegitimate behaviours without the fear of retaliation. Below are channels of guidance and instruction:

a. Direct manager(s), next level manager(s).

b. Head of Human Resources Division.

c. Head of Legal and Compliance Division.

d. Head of Internal Audit.

e. Head of the Supervisory Board.

f. The channels according to policies that PVCFC has issued.

**Article 26. Enforcement**

This Code of Business Conduct - COC contains 5 Chapters with 26 Articles, is created in accordance with the Company's Regulations, and is enforced from the signature date of the Board of Directors.

The implementation of this Code of Business Conduct will prevail in case of any discrepancies between its content and that of the Company's internal normative documents./.