



CODE OF CONDUCT

BAMBOO CAPITAL GROUP JOINT STOCK COMPANY

Version 1.0

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THE CEO'S MESSAGE

“ Let us work together to build BCG into a reputable enterprise where all activities are conducted properly, ethically, and for the benefit of society and all stakeholders. ”

Dear valued colleagues,

First and foremost, I would like to extend my sincere gratitude to all of you for your continuous efforts and dedication to the success of Bamboo Capital Group (BCG). Together, we have established the image of a reputable and trusted company.

Over the past 13 years since its establishment and development, BCG has grown into one of Vietnam's leading multi-sector conglomerates, with more than 60 subsidiaries and affiliates. This achievement reflects the trust our shareholders, clients, partners, and other stakeholders place in us. It stems from our business philosophy and activities, which center on ethics, people, the environment, and society-values that every member of the Group respects and upholds.

BCG is committed to pursuing business development in tandem with community and social progress, as an integral part of our sustainable growth strategy. We take great pride in our positive contributions to the environment, local communities, and the broader development of Vietnam's economy.

In addition, the Board of Directors and founders have always placed a strong emphasis on cultivating a healthy corporate culture. This serves as a solid foundation, providing inspiration and driving growth for BCG. Our goal is to foster a working environment where every employee feels at home-where they are heard, supported, and proud to be part of a collective that dares to dream big and strives for excellence as we grow together with BCG.

To achieve even greater success, BCG must further strengthen its foundations by upholding and promoting our core values. We must continue building trust and creating value for our partners, customers, shareholders, and employees.

Accordingly, this Code of Conduct has been developed as a practical guide to ensure we all adhere to the necessary standards of an ethical business. It sets out the core principles and norms that every employee, regardless of position, must comply with in all decisions and professional activities.

Furthermore, BCG expects that our partners and third parties demonstrate a similar understanding and respect for this code. We also encourage all employees to report violations and protect whistleblowers who expose breaches of this Code of Conduct.

Let us work together to build BCG into a reputable enterprise where all activities are conducted properly, ethically, and for the benefit of society and all stakeholders.

Thank you for your support and commitment to compliance!

Sincerely,

NGUYEN TUNG LAM



INTRODUCTION

OUR VISION, MISSION, AND CORE VALUES

01

VISION

BCG aims to be a leading Energy Group supported by Real Estate and Financial Services with full CSR wherever BCG operates.

02

MISSION

To build up trust and values for our business partners, clients, shareholders and employees by bridging and realizing business opportunities, based on experiences, professionalism, strong business connections and excellent understanding of both local and international cultures.

03

CORE VALUES

- Professionalism – Creativity – Enthusiasm
- Respect – Listening – Sharing
- Priorities on clients and business partners
- Maximizing efficiency and values
- Corporate social responsibility.

WHY DO WE HAVE A CODE OF CONDUCT?

The Code of Conduct serves as the foundation for the activities and sustainable development of Bamboo Capital Group Joint Stock Company ("BCG"). It outlines fundamental principles to ensure legal responsibility and ethical standards in every action and business activity.

The Code of Conduct acts as a guide, helping us make the best decisions in business, avoiding situations that compromise ethical values, and clarifying our responsibilities to the law, third parties, and each other.

The behavior of employees and staff, as well as customers, suppliers, and partners in all transactions, must meet the following requirements:

Compliance with the Law

Compliance with the Code of Conduct

Compliance with ethical standards

IMPLEMENTATION RESPONSIBILITIES



The Internal Audit Subcommittee

- The Internal Audit Subcommittee ("IASC") of Bamboo Capital Group JSC is primarily responsible for overseeing and enforcing the Code of Conduct.
- It is responsible for reviewing and proposing necessary amendments or additions to the Code when required.
- It is also responsible for establishing and implementing other information-gathering channels to ensure that the Code remains relevant, appropriate, and effective for the Company.



The Business Support Divisions and Human Resources Department

- The Business Support Division and Human Resources Department of Bamboo Capital Group JSC are primarily responsible for promoting the Code of Conduct:
 - Publicly communicating the Code to all employees working at the Company and its subsidiaries.
 - Providing guidance and training to employees to ensure understanding and implementation of the Code.
 - Ensuring that all employees have read, understood, and signed an acknowledgment of the Code of Conduct.
- Collaborating with the Internal Audit Subcommittee to monitor and enforce the Code.



The Board of Directors

- The Board of Directors of Bamboo Capital Group JSC is responsible for overseeing the Code of Conduct and making amendments, updates, or adjustments to ensure its effectiveness and relevance to the changing market and societal progress.
- Additionally, the Company encourages all employees to express concerns, provide feedback, or share opinions regarding the Code of Conduct and other Policies, to continuously improve the working environment and corporate culture.

COMPLIANCE RESPONSIBILITIES

This Code applies to the board, the management, and all employees of Bamboo Capital Group JSC and the companies within the Bamboo Capital Group ecosystem, including:

- All employees of BCG, including employees of subsidiaries and affiliates within the BCG ecosystem;
- Members of the Board of Directors, the Executive Board, and management at all levels within BCG and its subsidiaries.

Third parties providing services to the Company or acting on behalf of the Company are also required to fully comply with the standards outlined in this Code of Conduct.



Individual Accountability

- Employees are expected to understand and fully comply with this Code of Conduct, ensuring that personal behavior and ethics align with the ethical standards maintained and developed throughout the Company.
- Each employee is responsible for their actions, adhering to the highest standards of honesty and integrity-values that the Company expects from every employee.
- When faced with ethical dilemmas or uncertainty, employees have the right to seek help or guidance from their managers, the Executive Board, or the Internal Audit Subcommittee.



Leadership Accountability and Role Modeling

Leaders or managers within Bamboo Capital Group are expected not only to understand and comply with the Code of Conduct but also to encourage and foster a corporate culture of discipline, respect for ethical standards, and corporate values within their department and across the Company.

Setting an Example

- Fully understand the Code of Conduct and set an example by adhering to it in both words and actions, serving as a role model for other employees.
- Be available to answer any questions employees may have about the Code of Conduct.
- Lead with integrity through words and actions every day.
- Ensure that the team, especially new employees, understands the Code of Conduct and related practices.

Creating an Open Reporting Environment

- Promote a culture where employees feel safe and comfortable raising questions or expressing concerns.
- Be ready to listen and discuss concerns with employees.
- Request additional information respectfully and provide reassurance as needed.

Providing Feedback and Guidance

- For workplace issues, such as daily matters with colleagues or questions about company benefits, take immediate action to resolve the issue or contact the relevant department for timely resolution.
- For integrity-related issues, such as allegations of illegal or unethical behavior, report them to a higher-level manager or the Internal Audit Subcommittee.
- Prevent retaliation against any employee who reports concerns about actual or suspected misconduct and discipline anyone who retaliates or allows retaliation to occur.



APPLICATION OF THE CODE OF CONDUCT

UNDERSTAND AND COMPLY WITH THE CODE

SEEK GUIDANCE

REPORT VIOLATIONS



UNDERSTAND AND COMPLY WITH THE CODE

- Commit to complying with the Code of Conduct on a personal level.
- Abide by the Code, even when it contradicts instructions from management.
- Regularly confirm that the Code has been read, understood, and adhered to.



SEEK GUIDANCE

In the course of daily work, situations may arise that are not explicitly addressed by the Code of Conduct, the Company's ethical guidelines, or other referenced documents (e.g., internal regulations, policies, etc). In cases of uncertainty regarding appropriate conduct, employees should consider the following questions:

- Is my action legal?
- Does it align with BCG's core values?
- Does it comply with the Code of Conduct?
- Could it have negative consequences for the Company or myself?
- Would I be comfortable if this behavior were publicly disclosed?

This document regularly provides the necessary guidance; nevertheless, if any uncertainty remains, employees should seek advice from their manager, the Executive Board, the Business Support Division, Human Resources, or the Internal Audit Subcommittee.



REPORT VIOLATIONS

- Any violations of the Code must be reported promptly to enable the Company to take corrective action. Reports should be made truthfully and constructively to ensure that inappropriate behavior is addressed before it leads to legal risks or damages the Company's reputation.
- Reporting channels for violations include:
 - Direct or indirect managers;
 - The Executive Board;
 - The Business Support Division and Human Resources Department:
 - Email: hr@bamboocap.com.vn
 - Hotline: (+84) 28 62 680 680 - Ext: 502
 - The Internal Audit Subcommittee:
 - Email: ic.bcg@bamboocap.com.vn
- The Company ensures the following principles for reporting violations:
 - The confidentiality of the whistleblower, the reported issue, and any related information will be strictly protected. Such information will only be used within the investigation and resolution process.
 - Reports of violations or misconduct will be taken seriously, and necessary measures will be taken to ensure a thorough investigation, accurate conclusions, and appropriate corrective actions.
 - Retaliation against whistleblowers will be strictly prohibited. Any act of retaliation will be regarded as a violation of the Code of Conduct and will be dealt with accordingly.
- In cases where employees wish to report a violation or misconduct, the Company encourages providing personal details to ensure effective and timely communication during the investigation process. However, anonymous reporting will also be accepted.
- The Company strictly prohibits the misuse of the reporting process to cause difficulties for others or to provide false information. Acts such as false accusations, dishonest responses, or failure to cooperate with the investigation will also be treated as violations of the Code of Conduct.

AT THE WORKPLACE



PROMOTING DIVERSITY, EQUITY AND INCLUSION

- Employees must always treat each other with respect, equality, and appreciation for the differences between individuals from all backgrounds and regions.
- The Company does not tolerate any form of discrimination based on race, age, gender, physical appearance, skin color, nationality, religion, culture, or any other factor unrelated to the legitimate interests of the Company.
- The Company strives to maintain a positive working environment for all employees, where each individual perceives the workplace as family and takes pride in being part of the team.
- Every employee is responsible for contributing to and promoting a positive work environment.

MAINTAINING A HARASSMENT-FREE WORKPLACE

- Harassment of any kind, whether intentional or unintentional, verbal or physical, is strictly prohibited. While "harassment" is often understood as sexual harassment, workplace harassment may also include harassment related to ethnicity, religion, origin, nationality, gender, age, etc.
- The purpose of this Code is not to regulate the personal morals of employees but to ensure that no harassment occurs in the workplace.

ENSURING WORKPLACE HEALTH AND SAFETY

- The Company is committed to providing a safe workplace by complying with safety and labor hygiene regulations in offices, warehouses, workshops, and all other facilities within the Company's value chain.
- The Company promotes awareness and training for employees to ensure they understand the safety, hygiene regulations, and procedures for preventing hazardous conditions in the workplace.
- Employees must follow the Company's safety and labor hygiene regulations and report any accidents, risks, or unsafe conditions promptly to ensure timely resolution.

BUSINESS PRACTICES

OUR CUSTOMERS

Customers and their interests are the cornerstone of all the Company's business activities. We are committed to keeping our promises and fulfilling our commitments to customers, demonstrating our dedication to ethical business practices. The Company's primary responsibility is to ensure that all products and services consistently meet the highest quality standards.

FAIR COMPETITION

- Our competitors have legitimate business interests, and customers should benefit from fair competition. Therefore, we are committed to competing in a manner that is both fair and ethical, in compliance with competition laws in every jurisdiction where the Company operates.
- The Company respects confidential information about its competitors. Therefore, employees are only permitted to collect, use, and share competitor information in a lawful and ethically responsible manner.
- In addition, the Company strictly prohibits the following practices related to the acquisition of competitive information:
 - Engaging in any illegal activities to obtain competitive information, such as theft, eavesdropping, recording, bribery, or corruption.
 - Accepting or using competitor information that is believed to have been disclosed in violation of a confidentiality agreement or through other improper means.

OUR SUPPLIERS AND BUSINESS PARTNERS

- Cooperation should be based on mutual benefit, with both parties achieving their desired objectives and respecting each other's interests.
- The Company's suppliers and business partners must not only comply with legal regulations and standard business practices but also take their social and environmental responsibilities seriously. BCG is committed to providing equal opportunities for exchange, information sharing, and creating a transparent business environment.
- The Company is committed to dealing fairly and honestly with partners, investors, and shareholders. Furthermore, BCG ensures that the confidentiality of suppliers', partners', investors', and shareholders' private information is maintained, except in cases where disclosure is required by law.

INTERACTION WITH THE GOVERNMENT

- The Company is committed to maintaining the highest standards of integrity in all its interactions with government agencies.
- The Company strictly prohibits any illegal or unethical conduct aimed at obtaining or concealing information for personal benefit.
- Furthermore, the Company is steadfast in its commitment to avoiding any form of bribery to secure special advantages, such as permits or contracts.
- Employees are prohibited from using the Company's name to offer significant gifts, entertainment, or other benefits to government officials in an attempt to achieve specific objectives.
- To ensure compliance with the Company's external relations principles concerning government agencies, employees must seek guidance from the designated official responsible for external relations. Third parties acting on behalf of BCG must not engage in any form of bribery involving government officials, either directly or indirectly.
- The Company's leadership is responsible for approving or authorizing any gifts or valuable items offered to government officials by employees and must ensure these transactions are accurately documented in the Company's financial records.



GIFTS AND HOSPITALITY

- Abusing one's position, authority, or the Company's name for personal gain or to serve the interests of other organizations or individuals is strictly prohibited.
- Employees may not demand or accept any material gifts, cash, or benefits from suppliers, customers, or partners that could affect the objectivity of decisions regarding cooperation.
- Employees may accept legal gifts (courtesy gifts) from customers, but the details of all received gifts must be disclosed.
- Employees are expected to inform customers about BCG's principles regarding the acceptance of gifts.
- Further details regarding the giving and receiving of gifts are outlined in the Company's Anti-Bribery and Anti-Corruption Policy.

BRIBERY AND CORRUPTION

- The Company is committed to conducting business with integrity, based on the merits of our products, services, and employees. Attempting to influence customers, partners, suppliers, government officials, or any other individuals through cash or gifts to secure biased business decisions in favor of the Company is inappropriate and strictly prohibited. Additionally, employees accepting gifts that could affect the objectivity of decision-making is also prohibited.
- The Company is committed to complying with anti-bribery and anti-corruption laws in all countries and jurisdictions where it operates. Detailed provisions on anti-bribery and anti-corruption are outlined in the Company's Anti-Bribery and Anti-Corruption Policy.

CONFLICTS OF INTEREST

Recruitment and Human Resource Management

- The Company's recruitment and human resource management practices must adhere to the following principles:
 - Recruitment and employment must be based on the actual needs of the Company.
 - Fairness must be ensured in the selection and utilization of human resources.
 - Recruitment and employment decisions must be made based on clear criteria, including competency, experience, and skills relevant to the position.
 - No external influences should affect the recruitment and employment decisions of the Company
- Any actions that undermine or risk undermining the above principles will be considered violations and will be addressed in accordance with the Company's regulations.
- Individuals who exploit their position, authority, or personal relationships within the Company to influence those with the power to make recruitment or employment decisions for personal gain or to benefit family members will also be regarded as violating these principles and will be subject to disciplinary actions as per Company regulations.

Internal Auditing and Control Processes

Internal auditing and control activities must adhere to the following principles:

- The organization and operations of the auditing unit must be independent of the unit being audited. The auditing unit must ensure that its activities are free from any external interference during the evaluation and reporting process.
- The unit, the Unit Head, and the members involved in the internal audit must maintain objectivity, integrity, and fairness.

Procurement Practices

The procurement of goods and services, as well as the selection of suppliers, must be based on actual needs, quality, pricing, and other specific, reasonable criteria. Employees responsible for selecting or negotiating with suppliers must adhere to the Company's procurement policies and procedures, ensuring that personal interests and relationships do not interfere with decision-making in the best interest of the Company.



INTELLECTUAL PROPERTY

Intellectual property enables us to develop unique solutions that differentiate us from competitors and position us as one of the leading companies in the industry. All intellectual property created for the Company belongs to Bamboo Capital Group. It is essential to identify intellectual property, take appropriate actions to protect it, and ensure it is used solely for the benefit of the Company.

PROPER USE AND PROTECTION OF COMPANY ASSETS

- The Company's assets include both tangible assets, such as money, machinery, equipment, vehicles, and building systems, as well as intangible assets, such as confidential information, work time, network systems, software, and the intellectual property mentioned above.
- The use of Company assets must adhere to the following principles:
 - Act appropriately to ensure that the Company's assets and those entrusted to the Company remain intact, undamaged, not lost, and are not misused for non-business purposes. Any use of Company assets for purposes unrelated to work or the Company's benefit is strictly prohibited.
 - Personal gain from the use of Company assets or information is strictly prohibited.
 - Strictly comply with all guidelines and regulations regarding the use and protection of Company or third-party assets.
 - Immediately report any situations that may pose a threat to the Company's assets to a manager or relevant departments.



BOOKS AND RECORDS

- All employees must ensure that records and documentation within their scope of responsibility are complete, accurate, timely, and provide a truthful and clear reflection of the Company's actual business activities. Any intentional misrepresentation, falsification, or fabrication of the Company's records constitutes a violation of this Code of Conduct.
- The Company's records must meet the following requirements:
 - Reports submitted to government authorities must be complete, accurate, and timely;
 - Falsification of records is strictly prohibited;
 - The true nature of any content must not be distorted.
- Records retention:
 - Records must be retained as long as necessary for a legitimate business purpose or legally required.
 - Unauthorized destruction of records contrary to the Company's regulations or legal requirements is considered a serious violation that can negatively impact the Company, the violator, and may result in legal liability.

INFORMATION SECURITY

Safeguarding Customer Information

- In the course of business, the Company is entrusted by customers with personal and confidential information. This information must be used solely for providing products and services to customers and must be protected in accordance with the Company's Information Security Policy.
- Employees are responsible for ensuring the confidentiality of customer information by:
 - Protect confidential and personal information of both current and former customers, in line with commitments made to customers and applicable legal regulations.
 - Use confidential and personal customer information exclusively for business purposes, limiting its use to the minimum necessary to perform the required tasks.
 - Return or dispose of confidential and personal customer information in compliance with the Company's regulations and the agreements made with customers.

Safeguarding Employee Personal Data

- Within the scope permitted by law, the Company collects and manages personal information such as identification details, qualifications, work history, marital status, dependents, salaries, health conditions, and other benefits. For business operations, the Company may transfer employees' personal information to any location where the Company conducts lawful business activities.
- The handling of personal data must be carried out with caution and responsibility, in compliance with legal regulations. Employees responsible for processing personal data must adhere strictly to the following principles:
 - Perform all tasks involving personal data in accordance with the law.
 - Comply with confidentiality obligations related to personal data as outlined in relevant contracts.
 - Collect, use, and process personal data solely for legitimate business purposes, and retain it only for the necessary duration.
 - Restrict access to and sharing of personal data to individuals who need it for legitimate business purposes.
 - Ensure that individuals authorized to access or share personal data understand and commit to personal data confidentiality regulations.

- Allow data owners to review and correct their personal information held by the Company when necessary.
- Exercise strict control to prevent the unlawful disclosure of personal data.
- The confidentiality of personal data is also governed by the Company's internal regulations.

Confidential Information and Transactions

- Each employee is responsible for protecting the Company's confidential information, which includes but is not limited to project details, technical data, product information, mergers and acquisitions, financial data, operating costs, contracts, pricing, business plans and strategies, salaries, payroll data, and employees' personal information.
- Breaches of confidentiality, such as disclosing protected information, can severely harm the Company's legitimate interests, compromise its competitive advantage, damage its reputation, and negatively affect relationships with customers and partners. To prevent such risks, employees must adhere to the following requirements when handling the Company's information:

- Confidential information must not be disclosed to anyone outside the Company unless required for business purposes, and only after appropriate protective measures—such as signing a Non-Disclosure Agreement (NDA)—have been implemented.
- Confidential information should only be shared internally on a need-to-know basis for business purposes.
- Protect the Company's confidential information at all times and in all locations, including outside the workplace and after leaving the Company.
- The obligation to maintain confidentiality is explicitly outlined in the Company's Information Security Policy
- Engaging in insider trading based on confidential information or documents obtained through employment, or providing such information to others for insider trading purposes, is illegal and may result in criminal prosecution.



COMMUNICATING WITH THE PUBLIC

Media Relations and Public Statements

Employees publishing, speaking publicly, or responding to media inquiries must adhere to the following principles:

- Public statements or shared information on media platforms in a personal capacity must be made with caution and must not imply representation of the Company.
 - Employees may represent the Company only with prior written authorization or designation from an authorized Company representative.
 - Employees must exercise care in all communications, avoiding content that could lead to discomfort or negative consequences for themselves or others.
 - Employees must follow the Company's guidelines on public statements, media interviews, and responsible use of social media platforms.
- Requests for insights about Bamboo Capital Group, whether paid or unpaid, must be addressed only with prior written approval from the Company's authorized representative, Communications Department, or relevant division/department.

Proper Use of Email and the Internet

The use of work tools such as email, the internet, internal software, and social media platforms can lead to legal consequences for both the Company and employees. Content in emails, documents, and data accessed via the Internet must always be appropriate. Employees are prohibited from using email, internet, internal software, or social media platforms to access or distribute illegal, offensive, disruptive, or discriminatory content related to the Company.

COMPLIANCE WITH LEGAL AND REGULATIONS

- Bamboo Capital is committed to full compliance with the laws, regulations, and rules of the countries where the Company operates. All employees must adhere to all applicable laws and regulations while performing their duties.
- In cases where employees encounter a conflict between Bamboo Capital's standards and legal regulations or have concerns about the legality of their actions or those of colleagues, they should consult their direct manager, the Executive Board, or the Internal Audit Subcommittee.

CONTACT US

THE HUMAN RESOURCES DEPARTMENT OF BAMBOO CAPITAL GROUP

For inquiries about the Code of Conduct, or assistance and advice, employees can contact the Human Resources Department of the Business Support Division at Bamboo Capital Group.

- Email: hr@bamboocap.com.vn
- Hotline: (+84) 28 62 680 680 - Ext: 502

THE INTERNAL AUDIT SUBCOMMITTEE

For assistance, advice, or to report violations of the Code of Conduct, employees can contact the Internal Audit Subcommittee of Bamboo Capital Group.

- Email: ic.bcg@bamboocap.com.vn

To access Bamboo Capital's policies, please visit:
<https://bamboocap.com.vn/>



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