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CODE OF ETHICS AND CONDUCT

Hanoi, September 2024

CONTROL SHEET



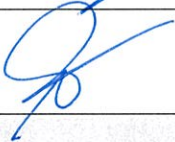
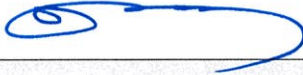

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CHAPTER I. GENERAL PROVISIONS

Article 1. Purpose

This Code of Ethics and Conduct (“**Code**”) is promulgated to provide required principles for actions and behavior of all employees, probationary employees, interns and other personnel if any (“**Personnel**”) of Pinetree Securities Corporation (“**Company**” or “**Pinetree**”).

Article 2. Scope of application

This Code is applied for all Personnel and departments of the Company.

CHAPTER II. CODE OF ETHICS AND CONDUCT

Article 3. Good faith and dignity

As proud members of Hanwha, each Personnel shall act with dignity and in good faith to fulfil their responsibilities, including:

- 3.1. Understand the Company’s business ideologies and principles, and work diligently and responsibly in performing all the duties.
- 3.2. Recognize fully that any actions and decisions can affect the reputation and trustworthiness of the Company as a whole, and therefore strive to live with discipline and dignity.
- 3.3. Do not slander others and/or the Company and/or otherwise undermine the reputation of the Company through the work performance and daily life, or through the use or activities on social media.

Article 4. Fair and Transparent Work Ethics

Each Personnel shall work in a fair and transparent manner in accordance with the applicable laws and common sense principles, and not accept or seek any money or other valuables in connection with the performance of duties:

- 4.1. Clearly distinguish between work and personal affairs and perform all of duties in a fair and transparent manner, and comply with all applicable laws, industrial norms and standards, and the universally accepted standard.
- 4.2. Record and report all information accurately and honestly, without omitting or falsely stating any material information.
- 4.3. Do not make any illegitimate requests to public officials, or provide them with any money or other valuables prohibited by the applicable law, and shall not engage in giving or

receiving of any money, valuables, meals, or entertainment to or from colleague or any persons who has related interest.

Article 5. Treating colleagues with consideration and respect

The Personnel shall accept and recognize the diversity of opinions and personalities of all colleagues, and shall not sexually harass any colleagues or abuse them verbally or physically, and will not otherwise treat them with disrespect or give inappropriate work orders or directives:

- 5.1. Respect and understand the abilities, experiences and diversity of all colleagues, and do not discriminate or give preferential treatment based on gender, age, educational level, family ties, regional ties, or school ties.
- 5.2. Do not verbally or physically abuse any colleagues, sexually harass them, or otherwise make or treat others as an outcast.
- 5.3. Do not harm the working environment by giving improper work orders or otherwise improperly exercise influence in abuse of the job position or authority.

Article 6. Healthy and safe work environment

To ensure safety for all employees, each Personnel shall comply with all health and safety policies and/or guidances of the Company, and strive to create a healthy and vibrant work environment for all:

- 6.1. Strive to prevent occupational accidents, injuries, disasters, or diseases at work through strict safety inspections and management according to the safety standards.
- 6.2. Strive to create a work environment with good work-life harmony by achieving harmonious balance between work concentration and relaxation times.
- 6.3. Strive to respect creativity and independence of each individual colleagues and to ensure a healthy and vibrant work environment for all.

Article 7. Protection of Company assets and information

The Personnel shall use the Company's expenses and all of its assets efficiently and appropriately for legitimate business purposes, and will protect all of the Company's trade secrets and other confidential or proprietary information:

- 7.1. Strive to conserve the Company's properties and use the Company's budgets and assets according to the applicable regulations and guidelines and for the appropriate business purpose.
- 7.2. Not embezzle or steal Company's funds or use them for personal use, or otherwise engage in any action that inflicts harm to the Company's assets.
- 7.3. Strive to protect the intellectual property rights and trade secrets of the Company, and will prevent external leaks, disclosure, or personal use of the same.

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Article 8. Harmony interests with the Company

Employees must not pursue illegal personal interests and must avoid conflicts of interest between personal interests and the Company's interests:

- 8.1.** Make efforts to prevent conflicts of interest arising from personal relationships that affect the Company's interests related to affiliate transactions, recruitment, and valuation.
- 8.2.** Do not disclose any confidential information of the Company or information obtained during employment to third parties, nor use such information for illegal personal gain, including securities or investment transactions.
- 8.3.** Do not establish or participate in your own company that offers the same type of goods or services in the same market as the Company.
- 8.4.** Do not use the Company's equipment, resources, assets, or business information obtained during employment for personal business or the benefit of individuals or organizations outside the Company.
- 8.5.** Do not use your own company or that of friends or relatives to provide goods or services to the Company's suppliers or customers.
- 8.6.** Do not exploit your position and authority at the Company to engage in transactions with third parties that are not entirely for the benefit of the Company.
- 8.7.** Do not use your position and authority to place relatives, friends, or others into management/executive, accounting, treasury, or other key positions in the Company for personal gain.
- 8.8.** Do not represent the Company in purchasing goods or services from suppliers that are your own company or that of friends or relatives.
- 8.9.** Do not directly or indirectly accept gifts or benefits from suppliers or customers of the Company in violation of Company regulations, against the Company's interests, or without Company permission.
- 8.10.** Do not work simultaneously for competitors of the Company.
- 8.11.** Do not use the Company's name/brand for personal gain or to benefit friends or relatives.
- 8.12.** Do not engage in other similar actions that create conflicts between the personal interests of employees and the interests of the Company.

Article 9. Respect for Customers

All Personnel shall respect the diversity of opinions of the customers, and will strive to ensure their trust and satisfaction to the best of the Personnel's abilities:

- 9.1.** Listen to the customer's opinions and strive to make customer satisfaction a standard of highest priority.
- 9.2.** Strive to keep promises with customers based on trust and loyalty, and to protect the customers' interests.

- 9.3. Take the utmost caution to protect customers from undue harm by preventing disclosure of their personal information.

Article 10. Shared growth with business partners

Each Personnel shall try to ensure mutual best interests with the Company's business partners by acting in accordance with the principle of shared growth and fair trade:

- 10.1. Strive to provide fair trading opportunities in accordance with the applicable laws and regulations, and to achieve transparency and fair dealing in all transactions.
- 10.2. Respect the intellectual property rights and trade secrets of the business partners and strive to maintain mutual trust and cooperative relationship with the business partners.
- 10.3. Do not make any rude remarks or engage in unfair practices by taking advantage of the Company's superior position over business partners.

Article 11. Respect for social values

The Personnel shall pursue the universal values of the society and earn social trust by respecting the social norms and the Company promises to the society:

- 11.1. Strive to comply with the society's ethical standards in all actions as an individual to achieve social trust for the Company.
- 11.2. Strive to harmonize the activities with the society by practicing the universal values.
- 11.3. Strive to respect the diversity in the society, and to display neutral position on social issues and political views in conducting the work duties.

Article 12. Compliance with global standards

Each Personnel will act in a manner that complies the global standards and respect the various cultures and values of local communities abroad

- 12.1. Strive to comply with all internationally accepted standards, such as the international treaties, international accounting standards, and ESG-related norms.
- 12.2. Understand the cultural values and traditions of the local communities abroad and respect their respective values.
- 12.3. Strive to achieve sustainable development for all.



CHAPTER III. IMPLEMENTATION PROVISIONS

Article 13. Effectiveness

- 13.1. This Code comes into force from its signing date and replace to the Code of Ethics and Conduct issued together with Decision No 22/2022/QĐ-TGD dated 29/7/2022 by General Director.
- 13.2. Any supplement, adjustment, amendment, annulment of this Code must be made in writing under a decision of the General Director or other competent person in accordance with the Company' regulation from time to time.

Article 14. Implementation

- 14.1. Issues that have not been mentioned in this Code, will be implemented in accordance with the relevant provisions of the law and internal regulations of the Company.
- 14.2. The entire Personnel and departments of the Company are responsible for the proper implementation of this Code and has the responsibility to report to the competent authority promptly when detecting any violation.

GENERAL DIRECTOR 

LEE JUN HYUCK