

POLICY ON PREVENTION AND COMBAT OF CORRUPTION

<i>Document number</i>	310/2024/CSH-HDQT
<i>Date of Issue</i>	18/11/2024
<i>Effective Date</i>	23/11/2024

TABLE OF CONTENTS

CHAPTER I: GENERAL PROVISIONS	3
Article 1. Purpose of issuance.....	3
Article 2. Scope of regulation and subjects of application	3
Article 3. Definition	3
CHAPTER II: SPECIFIC PROVISIONS.....	5
Article 4. Roles and Responsibilities	5
Article 5. Acts of corruption	8
Article 6. Declaration of zero tolerance for corruption and bribery	8
Article 7. Identifying, detecting, preventing and minimizing the risk of corruption and bribery	10
CHAPTER II: SPECIFIC PROVISIONS IN SOME FIELDS.....	12
Article 8. Identification of the areas necessary to be strengthened in prevention and combat of corruption	12
Article 9. Capital construction, procurement of goods and services	12
Article 10. Credit granting	13
Article 11. Financial and asset management.....	14
Article 12. Investment and project financing.....	15
Article 13. Appraisal and screening of employees in the area of recruitment and human resource management	15
Article 14. Third-party due diligence.....	15
Article 15. Activities related to Gifts, Entertainment, Travel funding	17
Article 16. Program of report/denunciation on corruption	17
Article 17. Resolution of violations	17
Article 18. Reporting Program.....	18
Article 19. Ensuring the confidentiality of information and reporting documents	18
Article 20. Retention of information, records, documents, reports.....	18
Article 21. Training and communication	18
CHAPTER III: PROVISIONS ON IMPLEMENTATION.....	18
Article 22. Revision and update of the Policy on Prevention and Combat of Corruption	18
Article 23. Implementation Terms	19
RELATED DOCUMENTS	22
FORM OF CIRCULATION/ TRAINING	22

POLICY

PREVENTION AND COMBAT OF CORRUPTION

CHAPTER I: GENERAL PROVISIONS

Article 1. Purpose of issuance

1. Implementing the United Nations Convention against Corruption, Vietnam's Law on Prevention and combat of corruption, the relevant standards of conduct and the professional ethics and general practices on prevention and combat of corruption at VPBank;
2. Establishing principles in the prevention and combat of corruption within VPBank, in the relations between VPBank and the State agencies, the State civil servants, relevant enterprises and individuals and organizations;
3. Orienting the implementation of plans, strategies and action programs under the direction of the State Bank of Vietnam and functional agencies and the implementation of law propagation, knowledge dissemination, training, reporting and performance according to the requirements of functional agencies in order to ensure compliance with the law on prevention and combat of corruption, aligning to the requirements of international standards and international cooperation in this field;
4. Preventing violations of regulations related to prevention and combat of corruption that affect VPBank's image and reputation or may cause damages to VPBank.

Article 2. Scope of regulation and subjects of application

1. Scope of regulation:

- a) The prevention and combat of corruption in the Bank's activities, determining the principles of prevention and resolution of prohibited acts or conditions for operation, inspection and control in order to prevent, prevent and handle in specific fields.
- b) Responsibilities and authorities of units in the implementation of statutory policies on prevention and combat of corruption, directives, action programs, plans and strategies on corruption and combat of corruption of the State Bank of Vietnam and functional agencies.

2. **Subjects of application:** All employees of VPBank, advisors, experts, contractors/suppliers, interns, collaborators, agents, customers, relevant partners

Article 3. Definition

1. **Corruption:** An act of a person in a position of power who has abused that position of power for self-interest.
2. **Person in a position of power:**
 - a) A person undertakes a task along with power while performing such task.

- b) That person hold a managerial position in VPBank¹
- 3. Units:** Including Divisions, Centers, Departments, Functional Boards of VPBank's Head Office, Regions, Branches, Transaction Offices and other units of VPBank throughout the system.
- 4. Third Party:** Any individuals or organizations subject to the application of this policy including: Employees of VPBank, VPBank's subsidiaries and persons contacting to VPBank for purpose of working with VPBank (Existing and potential customers, suppliers/contractors, business partners, agents, advisers, Governmental and State agencies (including their advisers, representatives and officials), politicians and political parties.
- 5. Embezzlement of property:** An act of abusing the position of power to seize the property of VPBank, a subsidiary of VPBank or a partner under their managerial responsibility or another person's manage but having related rights and obligations, the property is valued at more than VND 2 million or less than VND 2 million in the case of being disciplined but violating again.
- 6. Bribe:**
- 6.1. Giving bribes or brokering bribes:** The act of giving, paying, giving rewards, promising or providing directly or through intermediaries between the bribe giver and the bribe recipient with material benefits such as money, property, and other material benefits worth more than VND 2 million² as per the request of the recipient and the recipient having a position of power to conduct or refrain from conducting certain work for the benefit of the bribe-giver; or to organizations, State agencies or Government officials or employees of VPBank or VPBank's partners to achieve or retain business relationships, or to win business interests, or to influence the decisions of the State's agencies, organizations and individuals. This benefit includes, but is not limited to, obtaining permits or regulatory approvals, preventing adverse actions by the Government, reducing/avoiding taxes, customs duties and fees, or precluding competitors from participating in bidding.
- A bribe** can be anything containing value which includes any form of benefit, including, but not limited to:
- a) Money, assets, other material benefits or objects with equivalent value, loans, gifts or awards;
 - b) Leisure activities (e.g. payment for travel, hotel, living expenses or expenses of travel or accommodation in a resort);
 - c) Political or charitable contributions;
 - d) Offer or promise future employment (to an individual or their relative/close-knit

¹ Paragraph 2, Article 3 of the Law on Prevention and combat of corruption 2018;

² 02 million VND is referable threshold of the Criminal Code.

person);

- e) Providing scholarships to a relative of a partner, customer, or Government official;
- f) Favorable terms on product and service or product discounts;
- g) Use of means of transportation or accommodation;
- h) Discounted or free tickets for entertainment events;
- i) Services, personal benefits, or housing improvements;
- j) Opportunity to buy shares directly ("friends and family shares") in a company;
- k) Other immaterial benefits.

6.2. Receiving bribes: Acts of receiving bribes directly or through intermediaries from bribe-givers and brokers according to the provisions of Point 6.1, Paragraph 6, Article 3.

7. Corrupt property: Property obtained from corruption, property originating from corruption.

8. Explanation Responsibility: Responsibility of a unit and/or a person in a position of power to provide timely and adequate explanation of their decisions and behaviors while performing their assigned tasks and missions.

9. Nuisance: An act of being authoritarian, bossy, demanding, causing difficulties and troubles of a person with position of power while performing assigned tasks or missions.

10. Self-interest: The fact that a person with a position of power has abused his/her position of power to achieve improper material or immaterial benefits.

CHAPTER II: SPECIFIC PROVISIONS

Article 4. Roles and Responsibilities

1. Responsibilities of the Board of Directors

- a) Establish necessary policies and mechanisms to organize the implementation of relevant statutory provisions on prevention and combat of corruption in accordance with relevant law and retain the mechanism and policies of prevention and combat of corruption of internal VPBank.
- b) Provide necessary conditions to VPBank's Steering Committee on Prevention and Combat of Corruption and Crime, and to relevant employees to establish a mechanism for inspection, supervision, detection and strict handling of violations in relation to internal corruption or breaches of law.

2. Responsibilities of VPBank's Steering Committee on Prevention and Combat of Corruption and Crime

The Steering Committee on Prevention and Combat of Corruption and Crime established at VPBank in each period shall have the following responsibilities:

- a) Develop programs, strategies and measures to organize the implementation of

statutory provisions on prevention and combat of corruption and crime in the banking area and VPBank's regulations on prevention and combat of illegal activities in the banking and finance area of VPBank and relevant internal regulations;

- b) Direct organizations and units in VPBank's system to implement the prevention and combat of corruption and crime in the banking industry;
- c) Receive reports on information and summarize criminal and corrupt cases; conspicuous cases at units in VPBank, especially the situation of economic crimes and business risks (if any) detected through inspection, control, complaints and denunciations; press and mass media agencies; transferred from law enforcement authorities;
- d) Give directions, assign focal units or establish an Investigation Team/Working Group along with the participation of relevant units, departments to conduct investigation, verification, resolution for each cases if necessary;
- e) Ratify programs, plans and measures to organize the implementation of statutory provisions on prevention and combat of corruption and crime in the banking area and VPBank's regulations on prevention and combat of illegal activities in the field of banking and finance of VPBank and relevant internal regulations;
- f) Perform other responsibilities according to VPBank's regulations in each period.

3. Responsibilities of the General Director

- a) Formulate annual plans for prevention and combat corruption as required by law and competent authorities;
- b) Organize the promulgation of specific regulations on prevention and combat of corruption in the operational areas with high risk of corruption violations;
- c) Supervise and manage all daily activities, ensuring that the Bank is properly organized with sufficient resources, systems and tools to carry out activities in accordance with relevant law.

4. Responsibilities of Divisional Directors

- a) Direct and thoroughly grasp the subordinate units in the implementation of the internal policies in relation to prevention and combat of corruption of VPBank;
- b) According to the operational areas of the Division, the Divisional Director is responsible for proposing the Executive Board to enact documents to enforce measures to ensure that customers recognize VPBank's Policy on Prevention and combat of corruption and commit refrain from participating in breaching activities to this Policy. In the event that a customer violates this Policy, appropriate sanctions are required.

5. Responsibilities of the Legal and Compliance Division (L&C)

This document contains information that belongs to VPBank; It is strictly forbidden to copy and print in any form without the permission of VPBank's competent authority.

- a) The L&C Division is the focal unit to organize the implementation of compliance with the relevant law relevant to prevention and combat of corruption, as well as the unit to supervise the implementation of internal policies related to prevention and combat of corruption within VPBank;
- b) Advise the VPBank's Steering Committee on Prevention and Combat of Corruption and Crime and guide units/individuals to complete tasks related to prevention and combat of corruption;
- c) Formulate and coordinate in organizing training on prevention and combat of corruption, propagating the regulations of prevention and combat of corruption, disseminating violations and typical criminal acts in order to convey and draw lessons for employees;
- d) Be the focal point in organizing the reporting to the State Bank of Vietnam and functional agencies on prevention and combat of corruption in accordance with statutory provisions;
- e) Establish channels to receive denunciation information on fraud and corruption at VPBank, independently perform and/or coordinate with units in investigation, verification against corrupt acts, organize reporting and processing in accordance with the statutory provisions and signed agreements against corrupt acts;
- f) Assign specialized employees working in the field of prevention and combat of corruption as the focal point in working with relevant functional agencies, responsible for the general work of the Division related to prevention and combat of corruption;
- g) Report and propose the resolution for corrupt acts in accordance with statutory and VPBank's internal provisions.

6. Responsibilities of relevant units:

- a) The Fraud Prevention and Investigation Department – The Internal Security Center – Partnership and Corporate Affairs Division is responsible for:
 - Investigate acts suspected of corruption and bribery;
 - Promptly provide information and data records related to corruption and bribery cases to the Legal and Compliance Division for summary and resolution according to regulations.
- b) The Internal Expenditure Accounting Department – The Center of Centralized Procurement – Partnership and Corporate Affairs Division, the Human Resource Management Division and/or the relevant VPBank's departments varied by periods are responsible for providing information and data records as per the request of the Legal and Compliance Division in order to analyze and assess corruption and bribery risks in relation to:

- List of gifts, expenses for the festive reception;
- Outsourcing contracts (third parties), information, service fees, performance results of third parties;
- List, records, relevant personnel information...

7. Responsibilities of VPBank's employees

- a) Each VPBank's employees is responsible for learning about the statutory and VPBank's provisions on prevention and combat of corruption conveyed through introductions, propaganda or training classes implemented by VPBank;
- b) Each VPBank's employees is responsible for taking part in training classes and assessment on prevention and combat of corruption operated by VPBank;
- c) Every VPBank's employees should be aware that all statutory violations, especially the law related to prevention and combat of corruption, or directly committing corrupt acts within VPBank can seriously affect the image and reputation of VPBank and will be strictly executed;
- d) Each VPBank's employees needs to improve integrity, sense of responsibility for their work and seriously comply with VPBank's professional ethics rules as well as provisions on prevention and combat of corruption specified in this Policy and relevant regulations;
- e) When detecting corrupt acts of VPBank's employees, partners, customers, VPBank's employees must report to the specialized unit in order to investigate and resolve in accordance with VPBank's regulations.

Article 5. Acts of corruption

Acts of corruption in VPBank are committed by persons with a position of power in VPBank's units, including³:

1. Embezzlement of property;
2. Acceptance of bribes;
3. Receipt of bribes and brokering bribes to arrange the work in the unit for self-interest.

Article 6. Declaration of zero tolerance for corruption and bribery

1. VPBank guarantees to implement measures for prevention, detection, resolution and other activities related to prevention and combat of corruption in accordance with the statutory provisions, international standards and the internal regulations of VPBank.
2. VPBank says "NO" to acts of corruption and bribery; all acts related to corruption and bribery are strictly prohibited even if these activities are for the benefit of VPBank, including but not limited to: offering, giving or receiving bribes, facilitation payments, kickbacks, gifts, any other material or non-material benefits in a direct or indirect way

³ Paragraph 2, Article 2 of the Law on Prevention and Combat of Corruption 2018

This document contains information that belongs to VPBank; It is strictly forbidden to copy and print in any form without the permission of VPBank's competent authority.

through any third parties, so that the recipient performs contrary to the statutory and VPBank's internal regulations.

3. All acts of corruption must be detected, prevented and resolved in a timely, strict and transparent manner.
4. Regardless of their position and rank, those, who commit acts of corruption, must be executed intolerantly in accordance with the statutory and internal provisions.
5. Corrupt property must be taken over and confiscated; persons who commit acts of corruption and cause damage must pay compensation and reimbursement in accordance with the statutory and VPBank's provisions.
6. VPBank considers to suggest penalty reduction or exemption from criminal liability to the competent authorities in the case the person committing corrupt acts has been proactively confessing the acts, mitigating the damage from the acts, and returning corrupt property.
7. Regardless of retirement, resignation, and rearrangement, the person committing corruption still be addressed for the illegal acts.
8. The resolution of corrupt acts must be coordinated between relevant functional units (investigation, verification, internal disciplinary resolution, media, etc.) and promptly reported to competent managers.
9. VPBank commits to protect and keep confidential for the identity of individuals reporting on corruption, as well as consider, decide to apply measures to stop, prevent, promptly protect lawful rights and interests of such individuals when detecting damage or potential damage in accordance with VPBank's provisions and actual conditions.
10. In case the head or the deputy head of units performs corrupt acts, they shall be applied higher level of disciplinary actions.⁴
11. Prohibited acts:
 - a) Promising, providing, allowing, bribing directly or indirectly anything of value to anyone, including Government officials, employees, or representatives of State agencies or organizations owned or controlled by the Government, or to any individual or employee of the company in order to influence any action or decision of such individual to obtain or retain business relations or to secure any improper advantage to VPBank;
 - b) Contractors, suppliers or external partners promise to give or supply to any individuals related to the bank any kickbacks, donations, cash, bonuses, gifts, entertainment activities or anything of value in order to obtain favorable treatment or to secure an improper advantage from VPBank. Likewise, requests for privileges or benefits from contractors, suppliers, and/or third parties are prohibited;
 - c) Threatening, retaliating, and bullying against individuals who detect, report, denounce or provide information about corrupt acts;

⁴ Paragraph 3, Article 92 of the Law on Prevention and Combat of Corruption 2018

- d) Taking advantage of their positions or assignment to harass, demand, or request for benefits (or exchange benefits or for other personal interests) from customers, partners, suppliers, or other third parties;
- e) Receive money, assets or other benefits from partners, customers, suppliers, third parties to perform work, establish transactions, lend, provide products and services, or to enter into contracts with VPBank;
- f) Abusing the position of power to sign Labor Contracts/ Collaborator Contracts/ False Attendance in order to take over VPBank's property;
- g) Embezzlement of property;
- h) Disclosure of individuals who inform, report, denounce on corruption activities.
- i) Taking advantage of the information, reporting and denunciation of corruption to slander public agencies, organizations, units and other individuals;
- j) Illegal intervention in the detection and resolution process of corruption;
- k) covering up corrupt acts, obstructing the investigation and resolution of corrupt acts and other related acts;
- l) Taking advantage of their positions of power and other advantages obtained from their positions at VPBank to seek benefits for themselves or their relatives in an illegal way.

Article 7. Identifying, detecting, preventing and minimizing the risk of corruption and bribery

1. VPBank may annually conduct the risk assessments of corruption and bribery for the general operation of the bank and when necessary (including when there is a change in the law, change in VPBank's business activities or in case of risk assessment) to determine the risks that VPBank may encounter in the course of doing business. The results of the risk assessment will support VPBank to develop or adjust internal provisions to minimize the risk of corruption and bribery.
2. The General Director will review VPBank's risk assessment reports and suggest improvements for VPBank's policies and procedures in preventing and combating corruption to the Board of Directors.
3. Corrupt acts are identified and detected through the following signs:
 - a) Corruption is the act of a person with a position of power;
 - b) A corrupt person uses his/her position of power as a mechanism to commit illegal acts, contrary to VPBank's provisions;
 - c) The motive of the person committing corrupt acts is for self-interest.
4. Corrupt acts are detected through the following forms:
 - a) The inspection of VPBank's activities by the State's management agencies and/or

VPBank proactively operates self-inspection of all its activities in order to promptly detect, prevent and resolve corruption and bribery. Regular inspections are conducted according to programs and plans with a focus on fields and activities prone to corruption or irregular inspections are conducted when signs of corruption and bribery are detected;

- b) Inspection and audit activities;
- c) Handling of reports; handling complaints and denunciations about corrupt acts.

5. Principles of prevention and reduction of corruption risks: The prevention and combat of corruption needs to be carried out according to the following principles:

- a) Measures to prevent, detect, manage activities and acts related to corruption need to be aligned with the statutory and VPBank's provisions;
- b) Legal documents, internal regulations, policies, programs and action plans on prevention and combat of corruption must be disseminated and circulated to the implementers;
- c) Depending on their positions, job titles, which are related to or likely arising corrupt acts, relevant employees must be trained and guided to implement provisions on prevention and combat of corruption and professional ethics;
- d) VPBank implements policies to encourage activities related to self-detection, declaration and information to specialized units in order to ensure timely detection and resolution, resulting in the avoidance of significant impacts on units and organizations and serious consequences arising;
- e) The process of controlling and detecting signs and manifestations of corruption must be performed reasonably and cautiously;
- f) VPBank is responsible for publicization, transparency of policies, regulations and the implementation of policies and provisions of VPBank, ensuring fairness and democracy. VPBank's internal regulations on prevention and combat of corruption must be publicized on the System according to VPBank's provisions varied in each periods. Otherwise, in several specific areas, VPBank considers, decides on other publicization forms (for instance, display at transaction offices, post on official websites, fan pages of VPBank...) in conformity with statutory provisions, specialties and business of VPBank varied by the periods;
- g) The implementation plans on prevention and combat of corruption are enforced and along with the necessary internal control mechanism to ensure that the plans are enforced effectively;
- h) Guidance on the implementation must ensure the clear delimitation of the following main areas or aspects within prevention and combat of corruption as below:

- i. Gifts, entertainment activities, acts of goodwill and generosity;
- ii. Hospitality, accommodation, and events;
- iii. Facilitation money;
- iv. Charitable contributions;
- v. Political contributions;
- vi. Books, dossiers and vouchers;
- vii. Responsibilities and commitments of third parties, intermediaries, delegated, authorized or entrusted partners, suppliers, customers, partners;
- viii. Relations with political officials and local government officials where VPBank conducts business domestically and internationally;
- ix. Products, services and business activities related to State agencies, officials, servants and State-owned enterprises or appointed by State agencies;
- x. Procurement and investment.

CHAPTER II: SPECIFIC PROVISIONS IN SOME FIELDS

Article 8. Identification of the areas necessary to be strengthened in prevention and combat of corruption

1. Varied in each period, VPBank identifies and assesses corruption and bribery risks and identifies areas that are necessary to be strengthened in management activities on prevention and combat of corruption.
2. At the issuance date of this Policy, VPBank identified the areas specified in Chapter II that are necessary to be strengthened in the management of prevention and combat of corruption. These areas may be amended and supplemented according to VPBank's policies varied in each period.

Article 9. Capital construction, procurement of goods and services

1. The procurement of goods, services and capital construction must be publicized in accordance with the statutory and VPBank's provisions.
2. In case of procurement and capital construction that VPBank is required to bid by law, the contents in need of publication must be publicized in accordance with the statutory provisions on bidding.
3. Units and individuals at VPBank related to capital construction activities, procurement of goods and services, when sending bid specification document, dossiers of invitation for quotations, bids, bidding dossiers, must attach the Compliance Provisions on Prevention and Combat of Bribery and Corruption related to capital construction activities, procurement of goods and services at VPBank; meanwhile, partners are required to make

transparency commitment according to the VPBank's regulations.

4. Units participating in bidding and competitive bidding activities must be required to commit to and strictly implement VPBank's regulations on prevention and combat of corruption.
5. The General Director provides detailed guidance on the implementation of procedures and commitments of partners participating in the provision of services and products for VPBank to meet the requirements of prevention and combat of corruption and crime.

Article 10. Credit granting

1. Units that formulate products and services, develop policies, processes and provisions on credit granting or related to credit granting must be endeavor to create strict provisions, avoid loopholes which can be taken advantage of and creating crime and corruption.
2. Individuals and units, when participating in the credit granting process, must perform tasks in accordance with their authorities and the scope of assignment and strictly comply with VPBank's regulations on credit granting and relevant laws; Comply with the deadlines for processing work according to service level agreement and ensure the quality of work accomplishment, creating advantageous conditions for the business and customer services of the business units.
3. Strictly prohibited acts must be strictly disciplinary resolved as below:
 - a) Giving or receiving bribes related to colleagues, customers, partners or any other organization or individual for the purpose of influencing credit granting activities; Accepting bribes from customers to legalize loan applications contrary to relevant regulations; Forcing customers to cut a percentage or pay a "commission" for the loan amount;
 - b) Collusion with the outsiders of VPBank to make false contracts, raise the price of collaterals, create bogus projects/production and business plans to lend from VPBank, establish or hire others to establish backyard companies to lend money and use for personal purposes contrary to relevant provisions;
 - c) Self-approving credit or loans to himself/herself or his/her relatives or companies that bring material benefits to himself/herself and/or his/her relatives contrary to relevant regulations;
 - d) Using VPBank's image to borrow money from customers for personal purposes;
 - e) Taking advantage of assigned tasks, authority and banking profession to seize money from the bank and customers contrary to relevant regulations;
 - f) Using their authority to intervene in the process of granting credit for self-interest;
 - g) For self-interest, ignoring unfavorable signs in order to legalize conditions, loan documents, and collateral documents, leading to increase in risks to VPBank;

- h) Forging seals and signatures, forging documents to collude with customers directly served, managed in order to fraudulently seize bank money;
- i) Abusing their positions, missions and powers to make false dossiers in order to withdraw funds from banks for self-interest or collect extra fees beyond relevant regulations for personal use;
- j) Collusion with the VPBank's outsiders to make dossiers of application for debt exemption and reduction, debt cancellation or debt freezing for sharing benefits with enterprises and individuals;
- k) Abuse of a position of power in urging debt recovery to seize personal assets, borrow and seize money from others, release collateral contrary to the statutory and VPBank's provisions, causing losses to the Bank and/or customers for self-interest;
- l) Require service fees beyond the statutory and VPBank's provisions for personal purposes.
- m) VPBank's borrowers are provided with VPBank's policies related to prevention and combat of corruption as well as encouraged to denounce acts of corruption, bribery suggestion requests, and payment of fees outside the relevant provisions. Customers must commit not to give bribes or exchange benefits in order to approach to lending at VPBank.

Article 11. Financial and asset management

1. Regimes, norms and standards should be developed in a clear and public manner, with a mechanism to strictly control expenditure activities in accordance with relevant processes and regulations of VPBank.
2. Developing a detailed list of assets, controlling the use, allocation, regimes, conditions for equipping and allocating assets in a complete and strict manner, and publicizing policies to the whole system. Publication of the process and procedures for asset liquidation must be made in accordance with the statutory and VPBank's provisions.
3. Functional units need to periodically review promulgated documents stipulating norms and standards of each type of jobs and each type of titles such as: norms, standards for equipment and use of working rooms and facilities (gasoline, vehicles, computers, telephones, stationery and other supplies); the foreign business trip, the regime of payment of work-trip allowances, the regime of remuneration (salary, bonus, leave, study) for employees; on that basis, all employees are required to comply seriously and have a regular checking plan. On the basis of the provided norms, units with the function of managing finance, assets and human resources shall coordinate to monitor, propose and develop standard norms to submit to the Board of Directors and the Executive Board for proper promulgation varied in each period.
4. All expenditures, expenses, and use of assets are recorded in books, fully stored and strictly

controlled. Any off-book expenditures and expenses are a serious violation of this Policy.

5. Publicizing operational policies and financial management mechanisms; Annual financial plans; Details of incomes and expenditures specified by competent managers; The fund's operating results; Annual accounting settlement approved by competent managers; efficiency of use.
6. Social organizations need to publicize the fee policy, set up funds and use them for members of such organizations and need to broadly converse with members.

Article 12. Investment and project financing

1. Large investment and project financing should be encouraged to carry out the process of appraisal and examination of effectiveness in a transparent manner. Varied in each period, Corporation and Investment Banking Division must submit to the Investment Council investment portfolios and projects required to have binding policies from partners and customers related to commitment not to carry out bribery activities for public officials, individuals by VPBank to sign contracts, transactions and even commit to be sanctioned if conducting activities related to corruption.
2. VPBank will stop financing or investing in a project when clearly proven that corruption have occurred at any stage and the sanction is applied in accordance with the agreements and commitments that have been made.

Article 13. Appraisal and screening of employees in the area of recruitment and human resource management

1. Units employing employees are required to publicize the recruitment conditions and procedures for recruiting a new employee at VPBank in accordance with the recruitment processes and procedures.
2. VPBank's recruitment provisions/procedures are system-wide publicized. Units processing in recruitment are required to comply with the provisions and procedures and ensure the control of corruption and bribery risks in this area.
3. VPBank strictly prohibits receive money, material and non-material benefits in exchange for recruitment, appointment, advantageous position arrangement, proposal/approval of supplement of benefits to such employees, avoidance of disciplinary resolutions, or disadvantageous position arrangement.

Article 14. Third-party due diligence

1. VPBank commits to strictly comply with the provisions of the Vietnamese laws, the provisions of foreign organizations and partners and the International Convention Against Corruption, as well as seriously and comprehensively implement VPBank's internal policies, plans and provisions and internal regulations of organizations, partners to effectively prevent and combat corruption with respect to cooperation.

2. VPBank will strengthen coordination to early detect, prevent and promptly resolve corruption allegations to ensure safe, effective and transparent cooperation activities.
3. VPBank does not hire or cooperate with foreign organizations, partners or other third parties until VPBank has fully carried out due diligence to ensure that the third party has complied with the Law on Prevention and Combat of Corruption.
4. In order to minimize risks, VPBank must consider a number of factors before engaging in any cooperative relationship with a third party, including but not limited to the following criteria:
 - a) Reputable – have the necessary professional experience;
 - b) Reliable – VPBank checks the business situation of third parties to verify third-party claims of expertise;
 - c) Financial stability, sufficient resources to fulfill commitments to VPBank;
 - d) Compliance with the statutory and VPBank's provisions on prevention and combat of corruption and bribery.
 - e) The third party commits, acknowledges and agrees to comply with the provisions of this Policy.
 - f) Third parties are not subject to the following cautious situations:
 - i. The third party refuses to comply with the Law on Prevention and Combat of Corruption, other legal provisions and internal regulations of VPBank;
 - ii. The third party is notorious for bribery, corruption, or lack of business integrity;
 - iii. The third party requests unusual or excessive payments, such as over-invoicing requests, prepayments, unclear or last-minute payments, unusually large commissions, or undocumented reimbursement costs;
 - iv. The third party has the normal practice of making or proposing to make substantial payments in cash or by cheque payable in lieu of cash/noteholder;
 - v. The third party refuses to disclose or delay the provision of information related to its personnel information;
 - vi. The third party requests payment to an account in a country other than where the third party is incorporated or doing business;
 - vii. The third party requires payment to another third party, to an account with an unknown owner, or in cash or other forms of payment unable to verify the information;
 - viii. The third party requests VPBank to contribute political and charitable donations;
 - ix. The third party or one of the third party's executive board members, directors,

or senior executives are related to a public servant or have a close-knit personal or business relationship with that person;

Article 15. Activities related to Gifts, Entertainment, Travel funding

Activities related to gifts, entertainment, travel funding are performed according to internal documents on finance and expenditure of VPBank varied in each period. The control of the activities related to gifts, entertainment, travel funding is specified in the Regulation on the implementation of the issues of the Policy on prevention and combat of corruption and documents of amendments and supplements (if any).

Article 16. Program of report/denunciation on corruption

1. VPBank's employees are encouraged to raise concerns related to real or suspicious incidents of corruption and bribery.
2. VPBank establishes a channel for receiving denunciations of corruption and ensures the confidentiality of the identity of the whistleblower. The channel for receiving denunciations are officially operated by the Legal and Compliance Division via email, telephone or directly to the Director of Legal and Compliance Division. In addition, VPBank's functional units are prepared to receive information and forward to the units responsible for investigation and resolution.
3. VPBank not only resolves corrupt individuals but also resolves the following subjects: (i) individuals who threaten, retaliate or illegally disclose information of individuals who denounce corrupt acts; (ii) individuals who fail to comply with the provisions of this Policy or know but fail to report a violation.

Article 17. Resolution of violations

1. All employees of VPBank who do not comply with the Policy on Prevention and Control of Corruption, violate commitments (if any) on relevant activities to prevention and combat of corruption will be strictly resolved according to VPBank's provisions. Meanwhile, violators may be convicted criminal according to the law and banned from working in VPBank's system permanently.
2. Partners, customers or third parties violate commitments on prevention and combat of corruption and therefore violate VPBank's Policies, VPBank shall take one, some or all of legal actions as follows:
 - Handing the relevant documents to the public agency responsible for criminal investigation and prosecution;
 - Requesting for penalties as agreed;
 - Stopping, terminating business relationship and widely announcing to the public; Meanwhile, issuing warnings prohibiting transactions for a temporarily or permanently;

- Claiming for damages caused by adverse impacts on the image, reputation and ongoing transactions;
- Other remedies in accordance with the statutory and contractual provisions.

Article 18. Reporting Program

VPBank seriously, sufficiently, properly implements the regulations on reporting on prevention and combat of corruption as follows:

1. Types of reports: Periodic reports, thematic reports, irregular reports and case reports; the contents of the report, the reporting period, the time for collecting data, and the deadline for sending reports shall comply with the guidance of the State Bank of Vietnam varied in each period.
2. Form of sending reports: Reports shall be made in writing and sent by post, and confidential reports shall be sent according to regulations on confidential documents.

Article 19. Ensuring the confidentiality of information and reporting documents

1. All information and documents collected during the investigation, including the identities of the subject and witnesses, are kept strictly confidential;
2. The Investigation Team/Investigation Team will only disclose the information and documents in the reports to the competent individuals or organizations.

Article 20. Retention of information, records, documents, reports

1. VPBank shall fully and accurately archive and preserve dossiers, documents and reports related to anti-bribery and corruption within an appropriate period for each type of documents as prescribed by VPBank varied in each period.
2. VPBank establishes policies and regulations related to the storage and management of records and documented reports related to anti-bribery and corruption.

Article 21. Training and communication

1. VPBank's Policy on Prevention and Combat of Corruption is publicized according to relevant professional processes, internally, on the system, website and disseminated to all employees of VPBank. The Litigation, Complaint, Denouncement Handling & Anti Corruption Department – Legal and Compliance Division shall operate training with contents of this Policy in accordance with VPBank's regulations varied in each period.
2. VPBank also participates in training and circulation programs on prevention and combat of corruption implemented by external organizations depending on the needs and decisions varied in each period.

CHAPTER III: PROVISIONS ON IMPLEMENTATION

Article 22. Revision and update of the Policy on Prevention and Combat of Corruption

This policy will be revised in terms of effectiveness and validity within a maximum period of 03 years. This policy will be updated based on:

1. Changes to the Law on Prevention and Combat of Corruption of Vietnam;
2. Changes to the Policies relevant to prevention and combat of corruption enacted by the Government or the State Bank of Vietnam;
3. Changes to policies and procedures at VPBank;
4. Any other changes considered necessary and appropriate by VPBank's competent managers.

Article 23. Implementation Terms

1. This policy takes effect from 23/11/2023 and replaces VPBank's Policy on Prevention and Combat of Corruption No. 1039/2019/CS-HDQT dated 22/11/2019.
2. Any parts of this Policy contrary to the provisions of Vietnamese law will automatically be invalidated. In case there are different provisions in contracts and commitments with partners and customers, the provisions of such commitments and agreements will prevail.
3. All employees and units within the VPBank system are responsible for the implementation of this Policy. VPBank's General Director is responsible for regulating and guiding the prevention and combat of corruption in professional fields as required by this Policy.

Recipients:

- BOM; BOS;
- General Director; the DCEOs;
- Leaders of Divisions, Centers, Departments and Groups;
- Regional Director/Branches/Transaction Points;
- Employees of VPBank/HO;
- Keep at Office.

**REPRESENT TO THE BOARD OF DIRECTORS
CHAIRMAN**

NGO CHI DUNG

DASHBOARD OF DOCUMENT MANAGEMENT

Version number	01	
Basis for promulgating the Policy	Risk Management	Risk Type: Legal and Compliance Control risks
Text Type	Normative documents	
Document Format	Policy	
Division-level unit in charge of management	Legal and Compliance	
Center-level units in charge of management	N/A	
Department-level unit in charge of management	Litigation, Complaint, Denouncement Handling & Anti Corruption Department	
Department-level unit in charge of enforcement	All	
Central-level unit in charge of enforcement	All	
Division-level unit in charge of enforcement	All	
Business Segment	Level 1 Practice: Legal & Compliance Control Level 2 business segment: Violation resolutions Level 3 Business Segment: N/A	
Deployment channel	N/A	
Customer segment	N/A	
Competent authorities to promulgate	Board of Directors	
Signatories	Ngo Chi Dung	
Expiry Date	N/A	
Text contact points	Litigation, Complaint, Denouncement Handling & Anti Corruption Department: tckntc@vpbank.com.vn	
Last review date	N/A	
Next review date	N/A	

Review frequency	Annually
Document(s) to be replaced	VPBank's Policy on prevention and combat of corruption No. 224/2023/CS-HDQT dated 20/10/2023
Document(s) to be amended, supplemented	N/A
Document summaries	VPBank establishes its own policies with intention to prevent and combat corruption within VPBank, in the relations between VPBank and partners, customers, State agencies, public officials, State civil servants, relevant businesses and individuals and organizations

RELATED DOCUMENTS**1. Related Internal Documents**

STT	Text Name	Model number	Date of Issue
1	N/A		

2. Statutory provisions:

STT	Text Name	Model number	Date of Issue
1	Law on Prevention and Combat of Corruption	55/2005/QH11	Congress
2	Criminal Code	100/2015/QH13	Congress

3. Other references (if any):

STT	Text Name	Model number	Date of Issue
1	N/A		

FORM OF CIRCULATION/ TRAINING

Q&A	Email	Intensive training	Different
	X		