No: 62/2026/QD-BKS *Hanoi, June 30, 2026*

REGULATIONS
PROFESSIONAL ETHICS STANDARDS FOR MEMBERS OF THE BOARD OF SUPERVISORS

BOARD OF SUPERVISORS

SOUTHEAST ASIA COMMERCIAL JOINT STOCK BANK

- Pursuant to the Law on Credit Institutions 2024, its amending, supplementing and guiding documents;
- Pursuant to Circular No. 83/2025/TT-NHNN dated December 31, 2025, issued by the Governor of the State Bank of Vietnam, stipulating the internal control system of commercial banks and branches of foreign banks;
- Pursuant to the Charter of Southeast Asia Commercial Joint Stock Bank;
- Pursuant to the Regulations on the organization and operation of the Board of Supervisors of Southeast Asia Commercial Joint Stock Bank;
- Based on the recommendation of the Internal Audit Department;
- Considering the actual situation,

The following Code of Professional Ethics for Members of the Board of Supervisors of Southeast Asia Commercial Joint Stock Bank is hereby issued:

CHAPTER I
GENERAL PROVISIONS

Article 1. Purpose

1. To regulate the principles and ethical standards of its members. These are essential rules to ensure optimal effectiveness in the Board of Supervisors' operations.
2. Heightening the ethical standards of the Board of Supervisor ("BOS") members serves as a commitment for the bank and society as a whole to monitor, evaluate, and assist BOS members in maintaining proper ethical conduct and appropriate behavior while performing their duties.
3. This code of professional ethics serves as a basis for BOS members to orient themselves and make sound decisions in their professional activities.

Article 2. Scope and Regulated entities

1. **Scope**: This standard applies to the entire system of Southeast Asia Commercial Joint Stock Bank.
2. **Regulated entities**: This standard applies to members of the Board of Supervisors at SeABank.

Article 3. Definitions

1. **Definitions**

   For the purposes of this Regulations, the terms below shall be construed as follows:

a) **Professional ethical standards for members of the Board of Supervisors:** These are rules/standards, expressed in written form, that describe the expected behaviors of BOS members, supporting the effective operation of the SeABank's BOS.
b) **Members of the Board of Supervisors**: is elected by the General Meeting of Shareholders and exercises the rights, obligations, and responsibilities as stipulated in SeABank's internal regulations and applicable laws.

2. **Abbreviations**

-	SeABank	:	Southeast Asia Commercial Joint Stock Bank
-	BOD	:	Board of Directors
-	BOS	:	The Board of Supervisors
-	BOS Members	:	Members of the Board of Supervisors

Article 4. General principles

1. The BOS members are obligated to perform their duties in accordance with the professional ethical standards set forth in this Regulation. While working at SeABank, the BOS members are responsible for complying with the law, this Code of Conduct, and SeABank's regulations and policies. The BOS members are not permitted to cause damage to SeABank to generate profit for themselves or other entities.
2. Early detection and resolution of ethical issues is a crucial part of ensuring SeABank's sustainable development. The unique nature of the profession requires the members of BOS to possess strong ethical qualities, unwavering resolve in the face of temptations, and a high sense of responsibility to maintain the trust of the Board of Directors, the Board of Management[1] and SeABank's staff.
3. In the event of non-compliance with these Regulations, a BOS member may be subject to disciplinary measures in accordance with the internal regulations of the BOS. Depending on the severity of the violation, the individual supervisor may also be held legally responsible for their actions.

CHAPTER II

SPECIFIC PROVISIONS

Article 5. Professional ethical standards for members of the BOS

1. **Standard 1: Integrity**

a) Members of BOS must constantly cultivate and improve their professional competence, maintain integrity and transparency in all relationships involving financial interests and money, and be honest, straightforward, and serious with themselves and those involved.
b) The principle of integrity requires all BOS Members to be frank and honest in carrying out their assigned duties. Integrity also requires acting fairly, comprehensively, objectively, and reliably in professional relationships.

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[1] The Executive Board comprises the General Director, Deputy General Directors, Directors of Divisions/Departments, and other members of the Executive Board as decided by the General Director in each period.

c) BOS Members are not allowed to incite, condone, or assist in any illegal acts or violations of SeABank's internal regulations, and must avoid being influenced or interfered with in a way that leads to violations of the law.

2. Standard 2: Objectivity

a) BOS Members must demonstrate the highest level of objectivity in the course of its work.

b) The principle of objectivity requires all BOS members to judge fairly, without personal gain or the benefit of others, impartially, without bias, and to avoid conflicts[2] of interest at SeABank. BOS Members must provide fair assessments of all relevant issues and not be influenced by personal interests or by anyone else when giving their comments and evaluations.

3. Standard 3: Security

BOS Members must fully comply with all information security regulations as stipulated by law and SeABank's internal regulations. Strict confidentiality of information obtained during work is required; no information may be disclosed without the permission of the competent authority as per SeABank's regulations. In cases where a competent authority requests information, BOS Members must report to the competent authority for consideration and decision.

BOS Member has the responsibility and obligation to comply with the following:

a) The BOS member is obligated to respect the information security principles of units within the system, customers, and SeABank's general information, and must respect this principle in all relationships. They must not act arbitrarily and must be highly vigilant about the possibility of unintentionally disclosing information, especially in cases involving long-term collaboration with affiliated companies, relatives, or members of their immediate family.

b) When providing information to other departments within SeABank, BOS Members must obtain the approval of the Head of the BOS.

c) When providing information to external parties outside SeABank, BOS Members shall strictly comply with SeABank's current regulations, legal regulations on the procedures and authority for deciding on the provision of information, and must obtain approval from Head of the BOS or other competent authority as stipulated by SeABank in each period.

d) When providing information, BOS Members should ensure that the information provided is clear and has sufficient evidence to support it.

e) Store and preserve SeABank's records and documents in accordance with regulations, ensuring the safety and security of assets.

f) BOS Members must maintain the confidentiality of information they obtain during their work, even after they no longer work at SeABank.

g) BOS members are not allowed to use information they obtain or collect during the course of their work for purposes other than their assigned functions and duties, with the aim of benefiting themselves, others, or harming the legitimate interests of SeABank and/or other parties;

[2] Clause 5 Article 3 of the Circular No. 83/2025/TT-NHNN.

h) Do not access, exploit, or use confidential information about SeABank outside of authorized scope;
i) Implement information security measures and actions in accordance with the law and SeABank regulations to ensure: The process of issuing, copying, sending, receiving, storing, and destroying data does not leak information to unauthorized persons without access to the work area; access to personal computers is completely controlled, preventing unauthorized access or unauthorized entry by unauthorized persons;
j) For digitized information, regulations regarding computer access, internal networks, passwords, and identification codes must be followed to prevent unauthorized access to SeABank's information;
k) Do not independently install, modify, add to, or copy software programs on SeABank's internal network;
l) Do not use SeABank's system to obtain customer information unless that information is directly related to your work. Do not discuss confidential, top secret, or highly confidential information of SeABank (hereinafter commonly referred to as "Confidential Information" - according to the information security regulations) in public places, on forums (including SeABank's internal forums), on mobile phone networks, or on other means of communication;
m) Personal information and confidential data of employees (including medical records and personnel files) must not be disseminated or discussed outside of SeABank, except with the employee's consent or at the request of law enforcement agencies. Providing personal information to external organizations in any form requires the consent of the competent authority.
n) To ensure information security, BOS Member needs to implement, but is not limited to, the following workplace-applied measures:
    i. Ensure that at the end of the workday, there are no documents containing information related to SeABank's operations remaining on your desk;
    ii. All documents, notebooks, reports, files, and other papers must be securely stored in personal/shared filing cabinets (files may include the following but are not limited to this list):
        - Letters, documents, correspondence sent to or from customers, and transaction history information;
        - Copies from printers, photocopiers, and fax machines;
        - All reports, letters, and files;
    iii. In addition, BOS Members need to implement the following measures to ensure information security:
        - Cabinets and drawers must be locked, and the keys must be kept in a safe place by the person using/managing the cabinet or drawer;
        - In certain rooms/areas, access must be restricted to authorized personnel and secured to prevent unauthorized entry. In cases where unauthorized persons must be allowed access, they must be supervised by an authorized person;
        - Fingerprint/ID card time attendance and access control systems are operational and can be used wherever possible;

- Clear the whiteboard and collect the documents at the end of the meeting;
- Paper shredders and their waste bins are secured in several ways, such as:
  + Working documents containing information related to SeABank's operations, if not used by members of the BOS, should not be thrown in the trash without being destroyed first. They must be collected and destroyed using a document shredder;
  + For confidential and important documents and information, shred them into cross-cut pieces, not strips (if you have a shredder that shreds into cross-cut pieces);
  + Only those responsible for document disposal or authorized to dispose of documents have access to and handle document waste.

iv. Desktop computers, laptops, and other workstations need to comply with the below:
- Ensure that there is no unauthorized access;
- Log out of your current user account if you leave your desk or turn it off after work hours;
- Password protection must be installed and used in accordance with regulations;
- All other backup hard drives are guaranteed safe.

v. Comply with other legal regulations and SeABank's regulations on information security.

4. Standard 4: Work Responsibility

a) BOS Members must perform assigned tasks carefully and with a high sense of responsibility, ensuring that assigned tasks are completed on time and to meet the required quality.

b) BOS Members must always maintain a high sense of responsibility, continuously develop professional competence, and apply acquired knowledge, skills, and experience to perform their work most effectively.

c) BOS Members must not work negligently, dishonestly, without focus, or without a sense of responsibility.

d) BOS Members are responsible before the law, the General Meeting of Shareholders, and the Head of the BOS for the assigned tasks.

e) BOS Members must always respect and strive to contribute effectively to the legitimate and lawful objectives of SeABank.

5. Standard 5: Prudence & professional care and competence

The principles of professional prudence and competence of BOS Members must ensure the following elements:

a) Professional competence:

i. Regularly update and maintain necessary professional knowledge and skills.

ii. The BOS' members must have sufficient knowledge to assess risks and fraud and SeABank's risk management practices.

iii. The BOS' members must possess the necessary knowledge, skills, and other professional competencies to fulfill its responsibilities.

b) Professional prudence

When drawing a conclusion, the BOS' members must always be careful, thoroughly consider the legal regulations and internal regulations of SeABank, and examine the actual situation to make appropriate assessments. After careful consideration and giving their opinion, the BOS' members must maintain its stance and not easily change it when influenced by related parties unless there is a valid basis to alter the content of the case.

The BOS members must carry out its assigned tasks cautiously based on an assessment of the following factors:

i. Scope/Duration of Work Required to Achieve Job Objectives.
ii. The complexity, materiality, and importance of the contents being audited.
iii. The completeness, appropriateness, and effectiveness of governance, risk management, control, and operational.
iv. The possibility of material errors, fraud, and material non-compliance issues occurring during the internal audit process.
v. Correlation with potential costs and benefits.
vi. The BOS' members must be vigilant about significant risks that could affect the organization's objectives, operations, and resources.

6. **Standard 6: Independence and proactiveness**

The BOS' members must be organizationally independent and proactive in carrying out its work.

a) Independence means that the BOS' members are not bound by conditions that could threaten its ability to perform its duties impartially. To achieve the level of independence necessary for the effective performance of its responsibilities, the BOS' members have direct and unrestricted access to BOD Members, General Director, Deputy General Directors, and other managers.
b) The BOS members need to proactively improve its professional knowledge, cultivate high adaptability to changes in the environment and requirements in the new situation, constantly improve working methods, and enhance professional skills.
c) The BOS' members must not be complacent, dependent, or pass tasks to others; it must not be conservative or rigid, hindering innovation and creativity.

7. **Standard 7: Dedication to the profession**

a) The BOS' members must cultivate and protect its professional reputation and possess a high sense of responsibility. It must constantly strive to improve, accumulate experience, enhance knowledge, and apply acquired skills and experience to perform its assigned tasks most effectively.
b) The BOS' members must perform their duties with dedication and care, readily accepting and completing their tasks with utmost effort.
c) Professional conduct is also demonstrated through calm, cautious, and unhurried communication in work and in the presentation of suggestions and opinions.

8. **Standard 8: Avoid conflicts of interest**

a) A conflict of interest is a situation where a member of the BOS is in a position of trust but has conflicting professional and personal interests. This conflict makes it difficult for the BOS' member to perform their duties impartially and without bias. Conflicts of interest exist even when they do not cause serious ethical or professional consequences. Conflicts of interest can lead to a distorted view of reality, thereby diminishing the credibility of

SeABank's Board of Supervisors. Conflicts of interest also reduce the member of BOS's ability to perform its duties and responsibilities objectively.

b) The BOS member needs to be vigilant and possess professional skepticism regarding potential conflicts of interest. When faced with ethical issues, the BOS' member must adhere to the policies and regulations of the law as well as SeABank. If internal policies and regulations do not adequately address the actual situation and the conflicts are significant, the following issues must be reviewed:
   i. If a conflict arises with another BOS member and it cannot be resolved, then this matter must be reported to the highest authority (such as the General Meeting of Shareholders) if the conflict remains unresolved.
   ii. If the conflict persists and remains significant after reporting to all levels of internal leadership, in order to avoid violating professional ethics, the BOS' member must refuse to perform the work and clearly state the reason for the refusal.
   iii. If necessary, and if the conflict is substantial and involves legal regulations, the BOS' member is responsible for fulfilling its civic duty to notify the relevant authorities as soon as possible of such conduct.

9. Standard 9: Internal conduct

a) Conduct between the Head of the BOS and BOS members: BOS members must strictly adhere to task assignments and treat the Head of the BOS with respect and appropriate conduct. They should confidently express their views and offer persuasive advice to the Head of the BOS and other members when necessary to prevent errors and risks during the course of their work.

b) The Head of the BOS must respect, listen to, and encourage BOS members to express their views and opinions; consistently set an example in conduct; foster a harmonious and open atmosphere; promote fair and equal treatment of members of BOS; proactively assist in resolving difficulties and obstacles and protect the legitimate rights and interests of the members; refrain from victimization, discrimination, or actions that harm the honor of the members; and not abuse their position or status to utilize SeABank's information, know-how, or assets for personal gain or to the detriment of SeABank's interests.

c) Conduct among BOS members: Members shall respect and treat one another with propriety, maintaining internal solidarity and a spirit of collectivity, mutual respect, trust, and support. They must properly fulfill their duties and refrain from any actions that damage the reputation of other members. They should listen to colleagues' opinions, humbly learn from their experience, offer constructive feedback and analysis, and avoid exploiting personal relationships with colleagues to engage in fraudulent activities.

10. Standard 10: Interacting with individuals and departments within the system

BOS Members must maintain a serious and proper attitude while working, respecting and treating individuals, departments within the SeABank system with due respect; resolving issues according to right principles, with reasonableness and compassion; avoiding favoritism, causing inconvenience or harassment; and refraining from actions that lead to conflicts of interest.

CHAPTER III
TERMS ON ENFORCEMENT

Article 6. Enforcement

1. This Regulation takes effect from July 1, 2026, and replaces the Regulation on Professional Ethics for Members of the Board of Supervisors of Southeast Asia Commercial Joint Stock Bank No. 85/2018/QD-BKS dated December 25, 2018.
2. Any replacement, amendment, or supplementation of these Regulations shall be decided by the BOS.
3. During implementation, matters not regulated in this Regulation shall be governed by SeABank's current regulations and relevant laws. If any provision in this Regulation contradicts with the law, that provision shall automatically cease to be in effect.

Article 7. Implementation

Members of the Board of Supervisors and relevant individuals, departments have the responsibility to enforce this Regulation.

Recipients:
- *BOD, General Director (for information)*
- *As per Article 7 (for implementation);*
- *Risk Mgt/Leg & Comp Div (for oversight)*
- *Filed at BOS.*

ON BEHALF

OF THE BOARD OF SUPERVISORS

HEAD OF BOARD SUPERVISORS

(signature, full name and seal)