

EXTERNAL COMMUNICATION MECHANISM

1. Introduction

SeABank considers complaints to be an important part of impact management and encourages both internal and external stakeholders to report concerns as they emerge. As a result, the grievance mechanism is an integral component of SeABank approach to Stakeholder engagement and risk mitigation.

Complaints received by SeABank provide opportunities to inform and improve how SeABank conducts business, as well as to learn lessons so that similar Complaints are avoided in the future.

SeABank is committed to engaging with Stakeholders who voice issues in a consultative, fair, and equitable manner. SeABank is also committed to ensuring that no complainants face reprisal from or other Stakeholders for raising concerns and participating in the grievance resolution process.

This document describes SeABank communication mechanism, which is the process of receiving, acknowledging, investigating, resolving, and closing out Stakeholder complaints and concerns (hereinafter referred to as "Complaints") in relation to SeABank direct operations and/or those of our [Portfolio Companies/Clients].

2. External communication mechanism

(In certain circumstances, such as when a Complaint is more of a query or request for information, SeABank may be able to resolve a Complaint shortly after receiving it. In this situation, the Complainant shall be provided with the information necessary to address the issue, and the Complaint will be documented and closed once the Complainant is satisfied with the information provided)

When Complaints are more complex and require some investigation, the following process shall be used:

Step 1: Receive & Acknowledge Complaint

Executing unit: Contact Center

- **Receiving channel:**
 - *Email:* contact@seabank.com.vn
 - *Hotline:* 1900.599.952 – (024).3204.5952
- **Preliminary Classification:**
 - Group A (Spam/Advertisements): Not processed.
 - Group B (Service Complaints): Forwarded through the standard customer service process.

- Group C (Complaints with keywords related to the Social Environment): Complaints containing keywords such as: pollution, waste, noise, land reclamation, compensation, labor safety, child exploitation, harassment, desecration of historical sites, etc., should be forwarded to ESG team.

When submitting a complaint, the complainant must provide complete information regarding the complaint, including relevant documents or images.

Step 2: Validity Assessment and Classification

Executing Unit: ESG team.

Verification of Involvement: ESG team will communicate with the business unit to determine whether the subject of the complaint is a customer currently receiving credit from SeABank.

- **Validity Criteria:**

1. The complainant provides sufficient information for verification.
2. The issue raised falls within SeABank's scope of environmental management.
3. The subject of the complaint is related to SeABank's activities or a customer/project funded by SeABank.

- **Confirmation of Receipt:** Within 3 working days, the ESG team will send a confirmation email to the complainant, notifying them of the case number and the estimated processing time.

- **Internal Notification:** Send a notification to the business unit managing the customer in question for coordination.

Step 3: Investigation and Development of a Resolution Plan

Executing Unit: The ESG team will lead and coordinate with the Legal Department - Risk Management, Prevention & Control and the Business Unit.

- **On-site Verification:**

- Request the loan customer to provide explanations and evidence (Monitoring reports, legal documents, photographs, etc.).
- If necessary, conduct a field survey or interview the affected community.

- **Handling malicious/unfounded complaints:**

- If evidence shows the complaint is completely false and intended to harass, the ESG team will record "Unfounded Complaint," close the file, and send a refusal notice to the complainant, stating the reasons.

- **Establishing a Remediation Plan:** For truthful complaints, SeABank will require the loan customer to develop a remediation plan (e.g., installing an air filtration system).

- **Deadline: No more than 30 working days** from the date of receipt confirmation.

Step 4: Response, Closing the Complaint

- Response: The PTBV will inform the complainant of the investigation results and remedial measures (if any) in writing.
- Closing the complaint: The case is considered "Closed" when the complainant agrees with the proposed solution or when the borrower has completed the corrective actions as per the Remediation Plan under SeABank's supervision.
- Escalation Process:
 - o If the complainant does not agree: The case is forwarded to the Board of Directors for final review.
 - o SeABank provides information on third-party dispute resolution mechanisms to enable the complainant to exercise their rights.

Step 5: Recording, Archiving, and Reporting

- Database: All records must be stored on the management software or standardized data table, including:
 1. Case code.
 2. Date of receipt & Receiving channel.
 3. Information of the customer being complained against.
 4. Classification E (Environmental), S (Social), Other
 5. Processing status (Open/Processing/Closed).
- Periodic reporting: ESG team compiles reports for the Board of Directors and partners (when requested). The reports must clearly show the number of valid complaints and the complaint closure rate.