

REGULATIONS ON THE ENVIRONMENTAL-SOCIAL RISK MANAGEMENT SYSTEM AND SUSTAINABLE DEVELOPMENT STRATEGY AT SEABANK

1. Objectives:

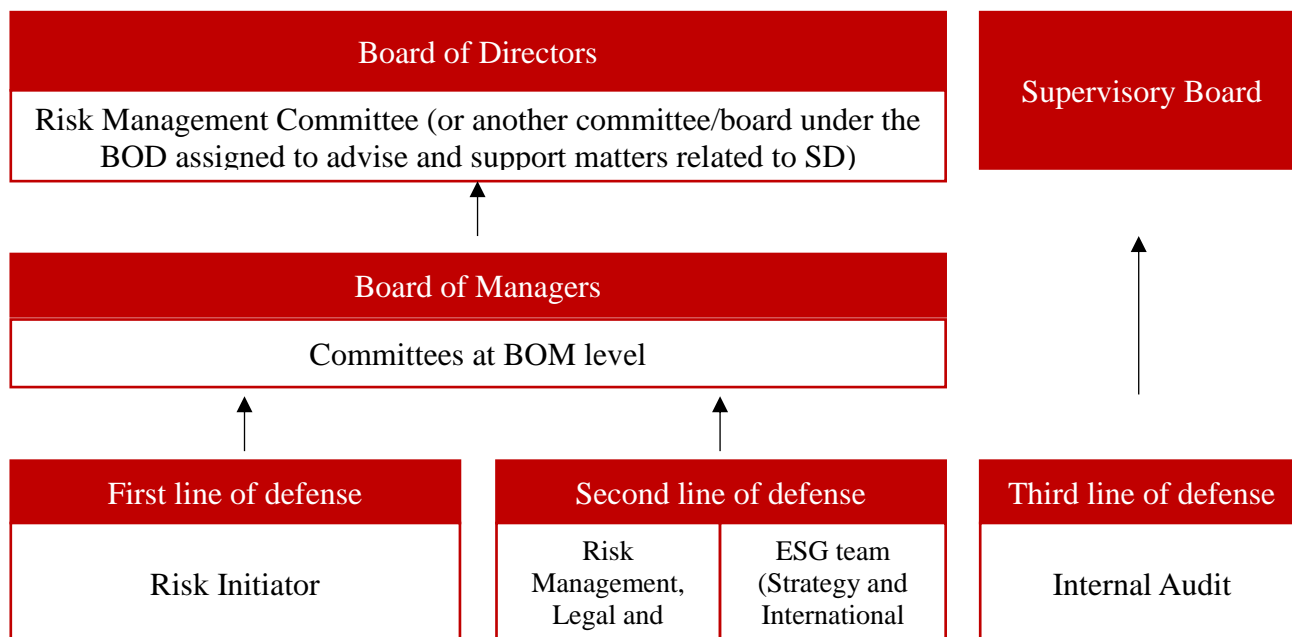
Integrate Environmental, Social, and Governance (ESG) criteria into the business strategy, aiming for sustainable development and supporting the national goal of achieving net-zero emissions by 2050, in alignment with the commitment made by the Prime Minister of Vietnam at the 26th Conference of the Parties to the United Nations Framework Convention on Climate Change (COP26).

Becoming a pioneering bank in green finance, catalyzing sustainable economic growth, and elevating the quality of life across our communities.

2. Governance structure and Sustainable development orientation

The SeABank Board of Directors has established a sustainability governance framework to oversee the effective and comprehensive implementation of SeABank's sustainability strategy.

3. Sustainability governance structure



SeABank aims to develop sustainable business operations and manage Environmental and Social (E&S) risks in accordance with global industry best practices. To pursue this strategic direction and ensure operational efficiency, SeABank implements, maintains, and continuously enhances its Environmental and Social Management System (ESMS). The ESMS is deeply integrated into the credit underwriting and investment processes, as well as the ongoing management of credit

and investment portfolios. This ensures that effectively managing the E&S risks and impacts associated with SeABank's lending and investment activities consistently remains a top priority.

SeABank incorporates the following Environmental and Social (E&S) principles across its credit and investment operations:

- (a) Assess Environmental and Social (E&S) risks and opportunities for each financing and investment transaction to achieve optimal long-term sustainability and mitigate potential adverse E&S impacts.
- (b) Promote the efficient use of resources and materials within SeABank's operations and among its clients.
- (c) Allocate adequate human, financial, and physical resources to ensure the effective implementation of SeABank's ESMS.

4. Specific goals

(a) Environment

- + Achieve a minimum of 5% green credit within the total credit portfolio by 2030.
- + Reduce greenhouse gas emissions from internal operations: achieve a 10% reduction by 2030 relative to 2025 levels (measured either as an absolute reduction or by emission intensity, calculated as tCO₂e/person/year or tCO₂e/m²/year).

(b) Social

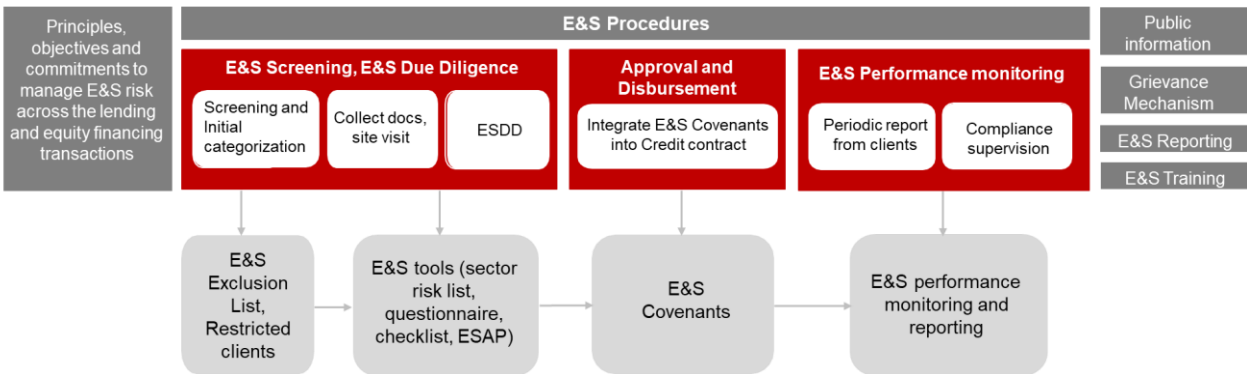
- + Provide financing to 100,000 local female clients, women-owned enterprises, and micro and small enterprises by 2030.
- + Achieve 40% female representation in leadership by 2030.

(c) Governance

- + Publish annual ESG reports in accordance with international standards (such as IFRS, GRI, etc.), as appropriate to SeABank's operational context in each period.
- + Ensure 100% compliance with anti-corruption policies and financial transparency standards.

5. Environmental and Social (E&S) Risk Management Process at SeABank

(a) Process



Environmental & Social Risk Management Process at SeABank

SeABank integrates the assessment and monitoring of Environmental and Social (E&S) risks alongside other risk factors during the credit underwriting process. For projects or clients categorized as medium or high E&S risk, SeABank requires the development of a Corrective Action Plan (CAP). This CAP forms an integral part of the credit agreement, legally binding the client to specific actions prior to and/or following disbursement. SeABank conducts post-disbursement monitoring and inspections to ensure clients strictly comply with SeABank's specific E&S conditions and commitments, as well as all applicable legal regulations. SeABank will suspend lending, halt disbursements, and consider early debt recovery for any projects that pose high E&S risks which cannot be effectively mitigated or remediated.

SeABank requires all clients and projects receiving financing or investment to comply with, or formally undertake to meet, the following Environmental and Social (E&S) requirements:

- i. Environmental and Social (E&S) Exclusion List: SeABank does not provide financing or credit to any client or activity included in SeABank's E&S Exclusion List.
- ii. Applicable Vietnamese laws and regulations concerning Environmental and Social (E&S) matters.
- iii. The International Labour Organization (ILO) Core Labour Conventions, the IFC Performance Standards, and the World Bank Group Environmental, Health, and Safety (EHS) Guidelines (applicable to high E&S risk transactions as required by SeABank's ESMS regulations from time to time).

(b) Implementing Personnel

SeABank has established a Sustainable Development department with with personnel specializing in the field of social and environmental to support the implementation of ESMS. For Corporate finance transactions or investment transactions with high E&S risks, SeABank will hire external experts to conduct E&S risk assessment before making decision.

(c) Training and Capacity Building

Since 2024, SeABank has implemented a blended training framework, integrating E-learning modules with in-person workshops, focused on Environmental and Social (E&S) risk assessment within credit operations to systematically enhance staff awareness and expertise in E&S risk management.

(d) Commitment to transparency, stakeholder engagement, and reporting.

+ **Transparency:** SeABank views transparency as a cornerstone of sustainable development. The Bank commits to disclosing general information on E&S risk management within its credit and investment activities. Clients are required to engage with stakeholders, identify affected communities, and maintain active dialogue through information disclosure and public consultation;

+ **Stakeholder Engagement:** Stakeholders include shareholders, clients, local communities, government agencies, NGOs, and SeABank employees involved in SeABank's governance and credit activities. SeABank ensures stakeholder participation in E&S risk management by establishing a grievance redress mechanism to receive and resolve complaints related to SeABank's E&S policies or Bank-financed projects and business operations;

+ **Reporting Framework:** SeABank establishes internal and external reporting mechanisms within its E&S risk management process to ensure the system is continuously monitored and improved. Relevant E&S risk management information is provided to stakeholders comprehensively and consistently, in accordance with SeABank's public transparency commitments.