



SEABANK'S PROFESSIONAL CODE OF ETHICS HANDBOOK



**LEGAL & COMPLIANCE
DIVISION**

MESSAGE FROM SEABANK

Dear Valued SeABankers,

Banking is a special type of business, founded on trust and inherently fraught with risks. Therefore, in addition to risk management tools, control systems, and warnings, all of SeABankers should proactively and consciously comply with regulatory laws, internal regulations, and professional ethical standards.

SeABank's Professional Code of Ethics Handbook is documented to help SeABankers study and enhance ethical awareness, thereby preventing unfair competition, risks, and frauds; enhancing service quality; ensuring and maintaining the Bank's reputation and brand image with internal and external customers, shareholders, partners, competent state agencies, and the community; contributing to its sustainable development and harvesting outstanding achievements in the entire banking industry.

SeABank's Professional Code of Ethics Handbook sets out standards for conduct among SeABank employees, between employees and customers, and with the public. This Handbook presents 22 rules of professional ethics and standards of conduct at SeABank, enabling SeABankers to understand and apply.

The Handbook is expected to drive SeABankers to make appropriate decisions throughout their professional operations.

All SeABankers are responsible for understanding and complying with this Code of Ethics, as well as promptly reporting any violations. Upon receiving this Handbook, SeABankers should read, implement the Code of ethics in their work, and sign a commitment to comply with the SeABank Code of Professional Ethics!



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RESPONSIBILITIES TOWARDS SEABANK

Rule 1: Compliance with regulatory laws, internal regulations, directives and guidelines

During the employment, the employees are responsible for complying with legal applicable laws, internal regulations, directives, and guidelines of SeABank, including: policies, regulations, statues, operational procedures, instructions, announcements, and operational guidelines (operational guidelines issued by functional units, guidance/directives emails from senior management such as operational manuals/handbooks, and other documents and materials related to operations...) that have been issued and communicated within SeABank..

Officers shall not collude with or abet any acts that violate the law and regulations of the banking industry and SeABank; avoid being influenced or interfered with in a way that leads to violating the law and regulations of SeABank.

Employees are prohibited from performing or directing any work that violates the law, internal regulations, directives, or guidelines of SeABank for any reason whatsoever, including aims of KPI or plan delivery. If an employee is directed by a superior to violate the laws, internal regulations, directives, or guidelines of SeABank, they must report this to Legal and Compliance via its hotline.

Employees should not be complacent, reckless, or gullible; skip or omit steps and procedures in the prescribed operational process. They must uphold accountability and voluntarily submit to supervision and control as prescribed, avoiding errors and oversights in the work process



Employees who violate any of SeABank's internal regulations, directives, or guidelines shall be liable to SeABank and the laws. Violators shall compensate SeABank for any damages incurred and be subject to disciplinary actions as stipulated in SeABank's Labor Regulations, corresponding compliance sanctions as per the Compliance Control Process No. 18802/2020/QD-TGD, and its replacements, amendments, and supplements from time to time.

Rule 2: Confidentiality of SeABank's information

During the employment and even after the termination, at SeABank, employees are responsible for maintaining the confidentiality of information (in written and/or digital form) that they become aware of in the course of working at SeABank, including but not limited to: strategic documents, projects, operational plans, data, reports on SeABank's financial situation (not subject to public disclosure in accordance with regulations), operational documents, internal directive/ guidance/ communication emails, technology systems, advertising programs, regulations on SeABank's products and services, information about customers, suppliers, partners, SeABank employees, or other information clearly marked as confidential, restricted access, or internal information.



- If any security vulnerabilities are detected, employees are responsible for promptly reporting them to Technology and Digital Banking Division's email at: attd@seabank.com.vn, and reporting to Deputy General Director in charge of Technology and Digital Banking Division and General Director;
- If other information leaks and violations of the above-mentioned provisions are detected, employees are responsible for promptly reporting them to Legal and Compliance via its hotline. After verification, Legal and Compliance forwards the information to Risk Management at the email address of gs.rrhd@seabank.com.vn

Rule 2: Confidentiality of SeABank's information

(cont.)

- In compliance with legal regulations on maintaining state secrets and SeABank's know-how that employees obtain or collect during their work at SeABank, employees shall not provide information that adversely affects SeABank's operations under any circumstances. If a state agency requests information, employees must report and obtain approval from the competent authority in accordance with the Statute on Information Management and Security No. 743/2021/QD-HDQT and its replacements, amendments, and supplements from time to time.
- Employees are prohibited from using the obtained or collected information for Sea Bank's purposes other than their assigned functions and duties, for the purpose of obtaining benefits for themselves or for others, or in any manner that may harm the lawful interests of SeABank and/or other parties.
- Employees do not access, exploit, or use confidential information of SeABank, or restricted-access information, outside of authorized scope;
- Employees take information security measures and actions in accordance with the laws and SeABank regulations to ensure that the process of issuing, copying, sending, receiving, storing, and shredding data does not lead to information leakage to persons who are ineligible to access to the work area; the access to personal computers is completely controlled, preventing access or entry by unauthorized persons;
- For digitized information, compliance with regulations regarding computer access, internal networks, passwords, and identification codes is required to prevent unauthorized access to SeABank's information;
- Employees do not install, modify, add, or copy software programs on SeABank's internal network system;
- Employees do not use the Bank's system to access customer information unless that information is directly related to their work. Employees do not discuss confidential, top secret, or highly confidential information of SeABank (hereinafter collectively referred to as "Confidential Information" - according to SeABank's Statute on Information Management and Security) in public places, on forums (including SeABank's internal forums), on mobile phone networks, or on other means of communication;
- Personal information and confidential data of employees (including but not limited to medical records and personnel files) must not be disseminated or discussed, except at the request of government agencies. Providing personal information to external organizations in any form requires the approval of the competent authority in accordance with SeABank's Statute on Information Management and Security.
- To ensure information security, employees should implement, but are not limited to, the following workplace measures:
 - i. At the end of each workday, employees' desks are free of documents containing information related to SeABank's operations;
 - ii. All documents, manuals, reports, files, records, and other papers securely stored in locked personal/shared filing cabinets.
 - iii. The confidential documents must be shred in accordance with applicable laws and SeABank's regulations. Other documents, shall be shred in accordance with SeABank's Statute on Information Management and Security.
 - iv. Employees comply with other applicable laws and regulations, as well as SeABank's Statute on Information Management and Security.

Rule 3: Confidentiality of Customer Information

Trust and reputation are the precious assets built with its customers. Therefore, ensuring the security of customer information and using such information appropriately is a top priority for SeABank.



- The buying and selling of customer information is strictly prohibited;
- The erasure, alteration, or falsification of customer information is strictly prohibited;
- Employees must exercise caution in handling customer information and ensure that such information is not leaked, misused, or discussed;
- Employees are not permitted to disclose customer information to any party except in cases where information is provided in accordance with the laws and SeABank regulations;
- Employees are only permitted to use customer information for business purposes as stipulated by SeABank and/or with the consent of SeABank's competent authority;
- Employees must promptly report to the competent management in case of detecting or suspecting customer information leakage or misuse, and must immediately take measures to prevent such leakage or misuse;
- The provision of customer information must comply with SeABank's regulations from time to time.
- Customer information must be stored accurately and fully updated in accordance with SeABank's regulations.

Rule 4: Protection of SeABank's Reputation and Brand

Reputation and brand are vital assets of SeABank. Damage to SeABank's reputation and credibility could have far-reaching impacts on its business operations.

Comply with the regulations on the use of SeABank's brand and brand identifiers in all internal documents, external transaction documents, marketing publications, emails, signage, name tags, ATMs, uniforms, or any means bearing the SeABank name, brand, or logo in public places or any location to avoid directly or indirectly negatively impacting SeABank's image;

Each employee is a representative and brand ambassador for the prestige, reputation, and image of SeABank, always striving to bring the best experiences and emotions to customers, partners, and stakeholders;

It is prohibited to engage in any actions, make statements, comments, or share information that is detrimental to SeABank's products, services, or any content related to SeABank on media platforms or the internet;

If employees discover that the SeABank brand and/or its identifying marks are being used improperly, for purposes other than intended, or in violation of copyright, they are responsible for promptly notifying their direct supervisor or the Communications and Marketing via email: comm.center@seabank.com.vn or the equivalent unit as per regulations from time to time.

Rule 4: Protection of SeABank's Reputation and Brand (cont.)

To protect SeABank's reputation and brand, all interactions, statements, and information provided to the media and/or the public require utmost caution and strict adherence to SeABank's regulations and applicable laws.

Communications and Marketing is responsible for establishing and maintaining regular relationships with media outlets to provide complete information in accordance with legal regulations on information disclosure and ad hoc information as required by SeABank's operations. All questions from the press and media regarding SeABank must be sent to SeABank's Communications and Marketing. Employees are only permitted to contact, speak to, or provide information to the media and/or the public, including on external forums and the internet, with the approval of the competent authority or in compliance with SeABank's Statute on Information Management and Security.

When requested by the media to respond or make a statement, employees must explain SeABank's internal procedures on this matter and suggest contacting the Communications and Marketing for clarification. If a response is mandatory, employees must clearly state that they will be responding in their personal capacity, not on behalf of SeABank. Furthermore, the content of the response must be clear and not misinterpreted as a response from SeABank, and media outlets should refrain from including any information or introductions regarding the employee's title within SeABank.

Any statements/publications /appearances made in the capacity of representing SeABank must be approved by the competent authority regarding their form and content before being made/released, in accordance with SeABank's internal regulations.

“Comply with SeABank's regulations on communication”.

Rule 5: Protection of SeABank's Assets

SeABank's assets are those assets as stipulated in SeABank's Asset Management Regulations No. 12660/2018/QD-TGD and subsequent amendments and supplements to those regulations from time to time.

To protect SeABank's assets, each employee is responsible for complying with the following:

- Comply strictly with SeABank's asset management regulations and any subsequent amendments or supplements;
- Use SeABank's assets only for the bank's operations, and not for personal or other purposes without the authorization of the competent authority;
- It is strictly prohibited to damage, illegally seize SeABank's assets, use them wastefully or inefficiently, or cause harm to the Bank's reputation and interests;
- When performing tasks related to depositing, receiving, and handling cash and assets for the Bank, employees must ensure compliance with regulations on the handling, storage, and transportation of cash, valuable assets, and securities of the Bank;
- Inventions, upgrades, innovations, or professional processes created by employees during their work at SeABank are the intellectual property of SeABank. Therefore, copying, selling, or distributing information belonging to SeABank's intellectual property is strictly prohibited;
- Employees must comply with the procedures for archiving and preserving documents, and take timely action in case of lost or destroyed documents in accordance with SeABank's regulations;
- Upon termination of employment at SeABank, or transfer to another unit/ job, employees are responsible for handing over to SeABank all assets provided by SeABank to them during their employment. The handover process must comply with the asset handover regulations applicable from time to time.



Rule 5: Protection of SeABank's Assets (cont.)

- Employees are responsible for protecting common assets. If any signs of unsafe use of assets or violations of asset management and usage regulations are detected, employees must promptly notify their supervisor or designated contact person via email or phone, and simultaneously send information to the following units:
 - For assets of cash and vault, employees should send information to Provincial Operations or Central Vault of Operations Division or equivalent unit from time to time;
 - For assets of office equipment/tools, transportation vehicles, and buildings, infrastructure, and other structures, employees should send information to Office Administration & Asset Management of Operations Division or equivalent unit applicable from time to time;
 - For assets of technology and information: employees shall report the information to Technology and Digital Banking Division for handling.
- Comply with other regulations on protecting of SeABank's assets.

Rule 6: Compliance with the Use of SeABank's Equipment and Technology

Equipment and technology include desktop computers, laptop computers, telephones, Internet access, mobile phones, and other access devices provided by SeABank to its employees. SeABank provides these devices and technologies to its employees for the Bank's business purposes; employees must comply with these regulations and use them ethically. The following activities using equipment and technology for the purposes of the bank are not acceptable at SeABank:

- Failure to comply with SeABank's asset management regulations from time to time;
- Activities that violate applicable laws and regulations on the protection of state secrets and national security;
- Harassment or discriminations such as threatening or harassing words or actions; discriminatory or derogatory comments, images, or messages;
- Indecent or obscene activities: Accessing, viewing, and storing pornographic or sexually suggestive material such as racist and sexist websites; ordering or distributing pornographic or sexually suggestive materials;
- Gambling activities include: accessing gambling websites, placing bets online, placing bets online or by phone, or checking betting results;



Rule 6: Compliance with the Use of SeABank's Equipment and Technology (cont.)

- Activities that damage SeABank's image include: Unethical or illegal actions (e.g., internally or externally disseminating unauthorized or confidential information), disrupting business operations (e.g., communicating unverified security warnings), attempting to destroy or illegally access SeABank's computers or computer systems;
- Activities that exploit or damage equipment and technology illegally, such as: Illegally using/accessing/interfering with equipment (computers, data storage devices, etc.) and systems owned and used by others, distributing malicious software/source code, or intentionally damaging equipment, data, and technology systems.



- Acts of copying or stealing data or IT equipment at SeABank for purposes outside the scope of work;
- Disclosure, sharing, or joint use of accounts and passwords under any circumstances, particularly lending or sharing user accounts of critical banking systems such as T24, Way4, Email, Card systems, and LOS, etc.;
- Other unacceptable activities, such as: downloading and installing files unrelated to work (game folders, audio files); sending emails to multiple recipients for non-work purposes; or excessive use of equipment and technology for personal purposes.

If employees discover any misuse of SeABank's equipment and technology, intentional destruction, or damage to property, they are responsible for promptly reporting it to the contact person specified in Rule 5.

Rule 7: Accuracy and Integrity of Records and Data in the Performance of Duties

The information, records, and data that form the basis for its appropriate decision-making are the property of SeABank. Therefore, each SeABanker is responsible for ensuring that the bank's information, records, and data are complete, accurate, timely, and truthfully reflect SeABank's business and financial operations.

- Employees ensure that information, records, and data of SeABank within the scope of one's assigned responsibilities truthfully and accurately reflect the Bank's business operations and financial situation, and take personal responsibility for the integrity and accuracy of the information, reports, and data under the management. In cases where there is suspicion or knowledge of any inaccuracies in SeABank's records or data, employees are responsible for promptly reporting the matter to Finance and Planning Division, Legal & Compliance Division, and Risk Management Division;
- Employees ensure Sea Bank's the truthful and accurate use of information, records, and documents provided by customers, suppliers, partners, etc.



- Employees are committed to ensuring that information, records, and data collected from customers, suppliers, and partners truthfully and accurately reflect the business and financial operations of those customers, suppliers, and partners. Any act of falsifying, manipulating, altering, erasing, or concealing information of customers, suppliers, and partners, and/or causing harm to the bank's interests, is strictly prohibited; as is any act of destroying records or documents related to violations of the law, litigation, or investigations by State agencies.

- Information and financial reports must be prepared in accordance with accounting principles and standards accepted under applicable laws, and must clearly and accurately reflect the Bank's operating results and financial position;
- Employees are responsible for cooperating in inspections and audits by State agencies or inspections and controls conducted by SeABank. Any employee who makes false or misleading statements to internal or independent auditors may constitute a violation and be subject to disciplinary action as prescribed by SeABank. Employees are not allowed to refuse or fail to report information that their authorized managers are aware of or request to be provided.

Rule 8: Anti-Bribery Policy

SeABank strictly prohibits any act of giving, brokering, or receiving bribes involving colleagues, customers, partners, contractors, suppliers of SeABank, or any other organization or individual, for the purpose of personal gain or to influence decisions, gain an advantage, avoid a disadvantage, or secure a business opportunity for an individual, related party, or related partner

In order to prevent bribery, employees are responsible for:

- Employees shall not authorize, promise, offer, or provide anything of value to any organization, individual, or related parties of such organizations or individuals, or to third parties or charities proposed by the recipient, for the purpose of influencing the recipient to take or refrain from taking any official action, to encourage the recipient to conduct business with SeABank, or to cause the recipient to improperly perform their duties.
- SeABank employees or their related parties are prohibited from receiving money or gifts from SeABank's partners, customers, or individuals/organizations related to customers or partners conducting transactions or relationships with SeABank, in any form. Employees may receive gifts that comply with legal regulations and are of small symbolic value, such as calendars, work notebooks, and other symbolic gifts, with the aim of fostering relationships with partners and customers to facilitate work, and must report this to their direct supervisor for their knowledge and understanding;
- SeABank employees are prohibited from suggesting or proactively receiving money or gifts in any form that could affect objectivity in their work, the evaluation of work quality, or the promotion or appointment of other employees;
- Employees are not permitted to legitimize charitable activities, funerals, weddings, year-end parties, or other festive occasions in order to receive gifts;
- In the event that an employee discovers any employee violating the above provisions, they are responsible for promptly reporting it to the Compliance hotline.



Rule 9: Avoidance of Conflicts of Interest

During their work, each employee will encounter situations involving conflicts of interest or potential conflicts of interest with SeABank.

Conflicts of interest may occur when:

- The interests or actions of an employee compete with or adversely affect their obligations to SeABank, its shareholders, and its customers;
- The interests or actions of an officer compete with or adversely affect the interests of SeABank, its shareholders, and its customers;
- An employee or their related persons receives benefits, products, services, or preferential treatment due to their position at SeABank.



To avoid conflicts of interest, employees are responsible for knowing and complying with the relevant policies that apply to them. Below are some typical conflict of interest scenarios and corresponding codes of conduct:

- Insider trading
- Investment
- Holding management positions or working for, or providing services to, another enterprise
- Use of SeABank's brand, information, and image
- Relationships with customers
- Colluding with or assisting customers in falsifying loan plans in order to make drawdown from SeABank for purposes inconsistent with the customers' actual use; concealing adverse information about customers or collateral
- External transactions
- Transactions with employees or related persons of employees
- Recruitment or appointment of related persons of employees
- Theft, fraud, deception, and corruption

If employees fail to comply with the above rules, resulting in a conflict of interest between SeABank and the interests of the employees or related persons, SeABank's interests must take precedence over other interests in the process of handling the consequences.

Rule 10: Whistleblowing and Handling Misconduct

Employees must promptly report to their direct manager and/or send information via the hotline of Compliance and Operational Risk Management when detecting any violations of the law, violations of SeABank regulations, or actions that may harm SeABank's reputation or cause a conflict of interest.

- Violations of the laws;
- Violations of internal regulations, directives, and guidelines of SeABank that have occurred, are occurring, or may occur;
- Concealing any of the above cases.

Reports of violations of laws and regulations by SeABank will be verified, and any violations (if any) will be handled according to SeABank's regulations from time to time. Depending on the nature and severity of the violation, the employee or unit involved may be subject to disciplinary action as follows: labor disciplinary action, compliance sanctions according to SeABank's regulations, and possibly criminal prosecution in accordance with the laws.



SeABank strictly prohibits any act of obstructing, retaliating against, or improperly handling complaints and denunciations; disclosing the name, address, signature, or other information of the complainant.

Employees may report any behavior that shows signs of violating all rules in this Code of Conduct through in-person meetings, telephone, email, or written submissions, and have the right to request anonymity. If reporting through in-person meetings or telephone, employees are then responsible for submitting a formal report via email (baocaosaipham@seabank.com.vn) or in writing to Legal and Compliance, Regional Director, Divisional Director in charge of the unit where the employee works, the member of the Board of Directors in charge of Legal and Compliance, the Head of the Supervisory Board, or the Head of Internal Audit.



RESPONSIBILITIES TOWARDS COLLEAGUES

Rule 11: Working with Colleagues

- Do not speak ill of colleagues, spread negative rumors, or make negative judgments about colleagues to third parties;
- Do not make romantic relationships with colleagues that violate the Law on Marriage and Family are strictly prohibited;
- Do not evade or shift responsibility or shortcomings onto colleagues;
- Do not form factions or cause internal division;
- Do not abuse trust, position, title, or authority to pressure colleagues into borrowing money or assets, or engage in fraudulent acts;
- Be honest, sincere, united, cooperative, willing to share responsibilities, and supportive of one another;
- Respect and listen to colleagues' opinions, humbly learn from their experiences, provide constructive feedback and analysis, openly and honestly exchange ideas on work-related issues, be willing to listen to differing opinions, and debate based on factual arguments and evidence;
- Promote teamwork, take personal responsibility for assigned tasks, continuously learn from the knowledge and experience shared by team members to improve work efficiency, and be open to receiving feedback from team members;
- Encourage and support the professional development of colleagues, fostering a spirit of continuous learning and striving for improvement;
- Respect the privacy of colleagues.



Rule 12: Responsibilities and Relationships of Employees towards Management

- Strictly adhere to labor discipline and the assignment of tasks by superiors in accordance with SeABank regulations; subordinates must respect and behave appropriately towards superiors; perform their duties correctly; and refrain from any actions that harm the reputation of superiors;
- Proactively express opinions, provide advice, and persuade superiors when necessary to avoid errors and risks in the work process.
- Do not visit the private residences of management except when invited by the management within the framework of a collective activity, or when requested by the superior for work-related reasons (in the case of urgent matters requiring immediate attention);
- Employees are not allowed to give gifts, items, or preferential treatment (through their own or their family's private businesses) to the management in their personal capacity.



Rule 13: Responsibilities of Management

- Managers serve as role models and inspire subordinates to work according to the organization's core values and principles;
- Emphasize the importance of understanding and adhering to the Code of Conduct, mission objectives and values, leadership principles, and policies and procedures applicable to the daily work responsibilities of team members;
- Understand the potential risks at work, individual activities, and unit's operations, and play an active role in ensuring work quality;
- Respect and sincerely listen to employees; encourage them to express their opinions and viewpoints; raise difficulties encountered in their work; and seriously consider and address the concerns of employees;
- Communicate information clearly, coherently, and consistently;



- Be truthful; do not conceal difficulties or obstacles; avoid making empty promises or commitments beyond one's capabilities; and adhere to the principle that words must be accompanied by actions;
- Assign tasks to employees in a reasonable manner, in alignment with their functions, duties, and the job descriptions of the positions;
- Promptly recognize and reward employees with outstanding performance, and strictly and objectively handle officers who violate applicable laws or SeABank's regulations;
- Protect the honor, lawful rights, and legitimate interests of subordinates;
- Treat subordinates fairly and equally; proactively support subordinates in resolving difficulties and challenges; and refrain from retaliation, discrimination, or any acts that may harm the dignity of subordinates;
- Provide direction, guidance, and training to subordinates in their work, with particular emphasis on compliance with the Bank's core values, standards, behavioral norms, and the Professional Code of Professional Ethics;
- Demonstrate care and consideration for the family circumstances and living conditions of officers;
- Do not participate in or conceal any acts of retaliation, and clearly communicate SeABank's anti-retaliation policy in the workplace.

- Be truthful; do not conceal difficulties or obstacles; avoid making empty promises or commitments beyond one's capabilities; and adhere to the principle that words must be accompanied by actions;
- Assign tasks to employees in a reasonable manner, in alignment with their functions, duties, and the job descriptions of the positions;
- Promptly recognize and reward employees with outstanding performance, and strictly and objectively handle officers who violate applicable laws or SeABank's regulations;



Rule 14: Resolution of Workplace Conflicts

When conflicts arise at work, employees must adhere to the following regulations:

Transparency and Listening:

- When conflicts arise, employees should present their goals and expected outcomes, communicating those goals and outcomes transparently to all stakeholders when initiating dialogue about the conflict;
- Employees need to identify conflicts as specific issues, not judgments about people;
- Employees need to listen to the colleagues' opinions when presenting their views. Employees should seek a holistic view of the conflict by directly questioning assumptions to understand their colleagues' perspectives and intentions instead of speculating or guessing their thoughts on the conflict. In other words, employees need to put themselves in their colleagues' shoes and listen, trying to understand their goals, perspectives, and reasoning when resolving the conflict.



Problem-Solving Awareness:

- As soon as a conflict arises, employees should promptly communicate with relevant parties to find a solution. Employees must not allow conflicts to drag on, become serious, or go unaddressed;
- Employees should focus on agreed-upon aspects, create consensus on common goals, and consider the advantages and disadvantages of each solution before addressing differences;
- After discussion, agreement, and a decision on the issue has been made by the competent authority, employees should not discuss the issue again and should express their agreement with the decisions made.

Spirit of Cooperation:

- Employees should strive to resolve conflicts with colleagues before reporting them to higher levels;
- Employees should communicate directly with colleagues involved in the conflict, and should not involve other parties in "gossiping" or "forming factions";
- Employees must clearly explain points that they believe cannot be negotiated in order to find a solution. Employees need to understand that all other points are negotiable to find a solution that benefits all parties and their organization.





RESPONSIBILITIES AT WORK

Rule 15: Proactiveness, Creativity, and Adaptability at Work

- Employees need to cultivate self-discipline and proactiveness, a spirit of inquiry and creativity to improve productivity, quality, and efficiency; develop the ability to adapt to changing environments and requirements in new situations; continuously improve working methods and enhance their soft skills to contribute to building a dynamic and innovative bank;
- Employees should not rely on others, delegate tasks to others, or be conservative and rigid, hindering innovation and creativity..



Rule 16: A Drug-Free and Stimulant-Free Workplace

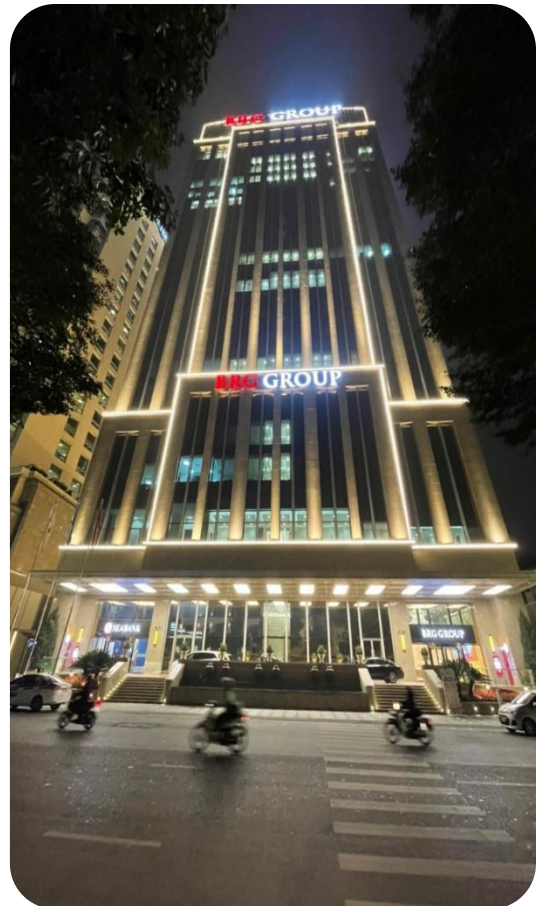


- Employees are committed to maintaining a healthy and efficient working environment, refraining from the use of drugs and stimulants (alcohol, beer, etc.) during working hours;
- The possession, use, sale, production, distribution, and processing of illegal drugs or stimulants while working at SeABank are strictly prohibited.

Rule 17: Building a Safe, Friendly, Healthy, and Equitable Workplace

Employees must comply with applicable laws and SeABank regulations to maintain a safe, friendly, healthy, equitable, and respectful working environment, including the following:

- Gambling in any form is strictly prohibited for employees at SeABank;
- Violence and intentional infliction of injury in any form are strictly prohibited at SeABank;
- Personal issues must not affect work or the workplace at SeABank (debt, jealousy, disputes, disturbances, fighting, violations of the law, threats, revenge, etc.);
- Harassment, discrimination, racial discrimination, ethnic discrimination, and gender discrimination are strictly prohibited in all forms, ensuring the creation of an equal, respectful, and healthy work environment.
- All forms of sexual harassment in the workplace are strictly prohibited; employees shall not store toxic substances, flammable or explosive materials, weapons, or dangerous objects in the workplace;
- Keep the workplace clean and tidy;
- Smoking is prohibited in areas where it is forbidden;
- Ensure the safety of walkways in the workplace;
- Use electricity, water, and bank equipment and supplies economically.



Employees are obligated to promptly report any violations of the above-mentioned regulations to their direct superiors or the Compliance Hotline. SeABank guarantees a fair and equitable working environment and policies regarding personnel, recruitment, training, provision of tools and equipment, and working conditions, free from racial discrimination and ethnic prejudice.

SeABank strictly prohibits any acts of retaliation or revenge against employees who report/denounce the aforementioned violations and will strengthen necessary measures to maintain a safe, friendly, healthy, and equitable working environment. Individuals who violate these regulations will be dealt with according to SeABank's regulations and the laws.



SeABank
Kết nối giá trị cuộc sống



**RESPONSIBILITIES
TOWARDS CUSTOMERS,
ORGANIZATIONS, AND
OTHER INDIVIDUALS**

Rule 18: Customer Centricity

SeABank always places customers at the center of all its banking operations. Customer satisfaction is the measure of SeABank's success and operational quality. Therefore, each employee must adhere to the following:

- Be honest and dedicated, conscientious and courteous, friendly, attentive, civilized, and polite towards customers;
- Employees demonstrate a professional and friendly transaction style; a quick and attentive demeanor, neat and polite attire, a serious and appropriate attitude while working, creating a positive impression and building trust with customers;
- Ensure fairness to all customers when providing services, resolving issues according to principles, reason, and compassion; without bias;



- Make every effort to provide the best products, services, and experiences for customers, including providing customers with accurate, complete, and clear information about SeABank's products and services;
- Employees must provide fair, transparent, and objective assessments of all relevant issues and not be influenced by personal interests or any other factors when making comments, evaluations, or decisions regarding customer transactions;



- Employees must fully fulfill all commitments and agreements between SeABank and its customers; diligently resolve any difficulties or problems customers may encounter related to SeABank;
- Employees are prohibited from harassing, demanding, extorting, or instigating customers or those with rights or interests related to customers in order to receive money or any material benefits, privileges, or preferential treatment for themselves or their related parties.



Rule 19: Fair and Honest Business Practices

Fair Business Practices and Healthy Competition with Rivals:

- Not engage in unfair, fraudulent, or abusive conduct and activities, such as manipulation, concealment, misuse of confidential information, or misrepresentation of facts;
- Provide fair and equitable access to goods, products, services, facilities, privileges, advantages, or adjustments, and making decisions about providing these benefits based on objective criteria;
- Do not discriminate against prospective or existing customers on the basis of race, color, religion, national origin, age, gender, sexual orientation, gender identity, disability status, marital status, or family status;
- Respectfully listen to and acknowledge feedback received from customers, partners, and those doing business with SeABank.

SeABank builds a business environment that ensures fairness and honesty with customers, suppliers, contractors, distributors, competitors, and SeABank employees

Fairness towards Suppliers and Contractors:

- Suppliers and contractors are individuals, organizations, and businesses that provide products and services to SeABank. Employees are responsible for ensuring fair and equal treatment in the supplier selection process. Contractors are given equal opportunities to participate in the bidding process and are selected according to the procedures and regulations issued by SeABank from time to time;
- Employees shall not suggest, accept money, gifts, or any material benefits in any form that would affect the objectivity of SeABank's contractor and supplier selection;
- Employees shall not promise or convince suppliers that they can inappropriately influence any procurement decisions at SeABank, nor shall they provide, suggest, or offer any business or service in exchange for other business operations;



- Employees are not permitted to participate in decision-making regarding matters (such as commercial contracts, product and service provision, etc.) where the performance of such matters directly or indirectly benefits the employee or their related parties;
- Employees and their related persons are not permitted to borrow or receive credit from any supplier, contractor, or partner of SeABank with unusual terms that could lead to a conflict of interest;
- Employees avoid actual or perceived conflicts of interest during procurement. When a conflict of interest is unavoidable or unintentionally occurs, employees must promptly report it to their direct supervisor for appropriate action.

Rule 20: Compliance with Anti-Money Laundering Regulations

Money laundering is the activity of legitimizing illicit funds, and it is not limited to cash transactions.

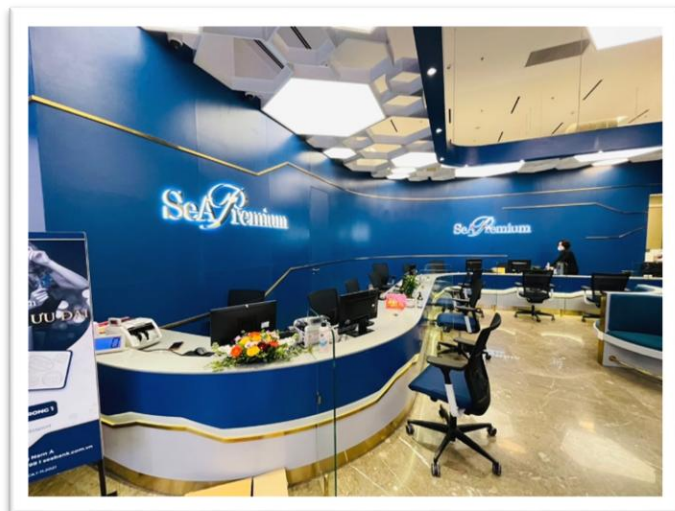
Anti-money laundering to prevent related crimes is not only the responsibility of credit institutions, but it is a global issue for governments and financial organizations. All employees must comply with current laws and SeABank's internal regulations on anti-money laundering. Employees are responsible for immediately reporting any suspected or detected money laundering activities to the line manager or Anti-Money Laundering of SeABank (Compliance - Legal and Compliance Division) via the email at amlfatca@seabank.com.vn or the equivalent unit/email address from time to time.



Rule 21: Conduct of Officers in Relations with State Agencies

In addition to complying with SeABank's internal regulations, each employee is obligated to comply with the regulations of State agencies. Employees need to be aware that violating legal regulations will have serious consequences for the organization and individuals involved and negatively impact the reputation, prestige, and interests of SeABank. Employees are responsible for complying with the following:

- Maintain a cooperative, courteous, and respectful attitude towards State agencies when performing assigned functions and duties;
- Always remain calm and have the right to respond and make appropriate, legitimate, and lawful requests in response to wrongful or disrespectful attitudes and behaviors towards SeABank employees and/or SeABank staff;
- SeABank employees are responsible for cooperating with State agencies when requested and must comply with SeABank's regulations related to the process of providing information and documents and the Bank's regulations on public statements.



Rule 22: Living and Working Responsibly towards the Community

One of SeABank's core values is "Connecting the Values of Life," which embodies the aspiration to always strive to build a model SeABank, a trusted partner, and sharing SeABank's success with all members of the organization and the community.

SeABank expects its employees to demonstrate community and social responsibility through the following actions:



- Share difficulties with members of the organization when they face hardship, through charitable activities initiated by SeABank or other contribution and support activities;
- Actively participate in charitable and voluntary programs organized by SeABank and/or other units;
- Proactively propose contribution and charitable activities to competent management levels for consideration and approval;
- Voluntarily comply with the laws and respect social equality, thereby contributing to the development of an equitable, safe, and healthy society.

- Always be proactive and act as the role model by performing good deeds that contribute to building a green, clean, and beautiful living environment at SeABank, at home, and in the community;
- Be conscious and take concrete actions to express gratitude to previous generations of SeABank employees - those who contributed to the building and growth of SeABank;
- Employees shall not independently raise funds for charity in the name of SeABank or donate SeABank's money to charity without the approval/assignment of the unit's leadership.





**BUILD STRONG COMPLIANCE
CULTURE AT SEABANK TOGETHER!**