



CODE OF CONDUCT

Masan Group Chairman's message

Masan operates with the goal of serving consumers with “Doing Well by Doing Good” philosophy. We lead this integrated consumer ecosystem model that spans from offline to online by modern technology. Masan always strives for sustainable growth and gradually achieves a leading position in the market.

Our reputation and the trust of Consumers, Customers, Investors, and Partners for Masan depends not only on what we do but also on how we do it.

Therefore, to preserve and enhance our reputation, we have issued a Masan's Code of Conduct and require all Masaners and subsidiaries to be responsible for making compliance an important part of our daily business operations. And there is no performance target that will be imposed or accepted in violation of governmental laws, regulations and Masan's Code of Conduct.

We understand that strategy, platform and brands are important, but our culture will determine our future. You should always remember that the code set out in this document are not optional: you must be aware of them, apply them, and set an example.

I encourage you to spend time with this Code of Conduct, discuss it with your line manager and colleagues, and most importantly, to come back to it when you are looking for the right path in anything you are doing, whether it seems big or small at Masan.

April 26, 2024

(Signed)

Nguyễn Đăng Quang
Chairman
Masan Group

Why do we have this Code of Conduct?

“Consumer-centricity” is the guiding principle for all Masan's Code of Conduct

The Code of Conduct is the core and foundation of the operations of Masan Group Corporation and member companies (hereinafter referred to as “Masan”)

The Code of Conduct (hereinafter referred to as “The Code”) includes essential regulations to be followed and guides actions that are the foundation for promoting Masan's core values, qualities, and action principles to fulfill our mission.

Our Code of Conduct is also Masan’s commitment to compliance in business operations, including both internal activities and those with partners.



Our 8 Code of Conduct

1. DOING BUSINESS IN COMPLIANCE WITH THE LAW AND FAIR COMPETITION

Masan conducts business honestly and in accordance with the law. It competes fairly and ethically in the markets that we do the business.

Masan complies and requires all employees to comply with all applicable laws and regulations in where we do business.

Masan complies with anti-money laundering regulations and does not tolerate embezzlement, corruption or bribery.

3. RESPONSIBILITIES TO OUR BUSINESS PARTNERS

Masan commits to establish equal business relationships with all partners with the desire to bring harmonious benefits to all parties. Masan expects its partners to respect and implement Masan's basic principles of honest business and fair competition.

5. COMMUNICATION WITH THE MEDIA AND INVESTORS

Masan provides information fairly and honestly to the media and the public and provides full business information in accordance with the law to investors and shareholders.

7. FAIR TREATMENT AND CREATING A SAFE WORKING ENVIRONMENT FOR EMPLOYEES

Masan commits to create a healthy and safe environment for employees and respect the differences.

Masan commits to building a fair workplace where all employees have equal opportunities to succeed.

2. SOCIAL AND COMMUNITY RESPONSIBILITY

Masan is deeply aware of our role and responsibility to the community, society and the environment in which we live. Masan commits to support sustainable development standards.

Masan sets high standards to ensure profitable production and business, protect the natural environment, the working environment, implement gender equality, labor and food safety, and the rights of employees, consumer rights and improve community life.

4. ACCURACY AND TRUTHFULNESS OF RECORDS AND DOCUMENTS

Every Masaners is responsible for all information, records, and documents that they provide; including but not limited to reports, presentations, and books.

6. INFORMATION PROTECTION

Masan commits to collect, process and use information, including personal information of employees, customers and consumers according to the best standards and in compliance with current legal regulations on personal information protection.

8. CONFLICT OF INTEREST

Masan does not allow employees to use internal information to conduct transactions for personal purposes, including transactions on markets with listed shares of Masan and/or its subsidiaries.

All Masaners will not directly and indirectly engage in business activities that could be considered contrary to Masan's interests or in conflict with their responsibilities at Masan.

1. DOING BUSINESS IN COMPLIANCE WITH THE LAW AND FAIR COMPETITION

WE ARE RESPONSIBLE TO:

- Strictly comply with all applicable laws and regulations.
 - Represent Masan in a fair and reasonable manner, ensuring that information provided about Masan and its competitors is accurate.
 - Draft commercial documents in a transparent and truthful manner.
-

WE ARE NOT ALLOWED TO:

- Directly and/or indirectly engage in any money laundering activities, always ensuring that transactions are carried out with reputable and reliable customers.
- Exchange business information with competitors and/or partners (outside the scope of agreed cooperation).
- Disclosure of confidential information related to bidding documents to employees of competitors and/or partners.
- Intentionally disparage or defame our competitors in any form, especially about their capabilities, product/service quality.
- Obtain or seek to obtain confidential information from employees of potential customers.

2. SOCIAL AND COMMUNITY RESPONSIBILITY

Masan always demonstrates the highest level of responsibility to:

- Community: Masan always prioritizes environmental protection, community health protection, and then social and charitable work.
- Consumers: Masan always strives to provide products and services that meet customer needs well, competitive prices, safe to use, protect consumer rights.
- Shareholders: Masan always demonstrates the core responsibility in transparent information disclosure, efficient company management and rational use of capital to create value added for the Enterprise.
- Employees: Masan is always committed to creating good working conditions with fair and competitive compensation and benefits policies, treating all employees equally, and fostering a healthy and safe working environment.

3. RESPONSIBILITIES TO OUR BUSINESS PARTNERS

WE ARE RESPONSIBLE TO:

- Adhere to all applicable regulations and internal procedures to monitor the use and selection of the business partners (intermediaries, subcontractors, and suppliers).
- Ensure that payments are made in a fair and proper manner and are properly recorded.
- Ensure that inappropriate payments are not made to parties or through their intermediaries.
- Always be aware that the remuneration of an intermediary is always commensurate with their efforts and capabilities.
- Reject unusual arrangements (especially financial arrangements) with customers or suppliers, such as overcharging a party that is not involved in the transaction.
- Carry out procurement activities in a fair and transparent manner.
- Not allow gifts and entertainment to influence or affect our independent business decisions or the independent business decisions of the companies we work with.

WE ARE NOT ALLOWED TO:

- Accept payments or benefits from suppliers in exchange for them receiving a procurement contract.
- Solicit, accept, promise, offer, or make (whether directly or indirectly) a bribe (money and/or gifts and/or invitation) while carrying out duties or signing contracts.

4. ACCURACY AND TRUTHFULNESS OF RECORDS AND DOCUMENTS

WE ARE RESPONSIBLE TO:

- Ensure that all information and documents provided or transmitted internally or externally to Regulatory Bodies, Investors, and Third Parties are complete, accurate, and reliable, especially for information and documents related to human resources, finance, legal, tax, and regulatory reporting documents.
 - Only create records in accordance with applicable laws (unless there is a clear business purpose and approved by the authorized authority).
 - Destroy records in accordance with Masan's record retention policy.
-

WE ARE NOT ALLOWED TO:

- Destroy records related to potential litigation, complaints, or records that may be under investigation.
- Change documents for any pressure, influence, or impact.
- Report data and/or change it incorrectly.
- Engage in fraudulent or deceptive acts related to records, documents, or information; for the purpose of misappropriating money, property, or something of value (such as achieving a work goal or receiving a payment) or avoiding negative consequences (such as disciplinary action).

5. COMMUNICATION WITH THE MEDIA AND INVESTORS

WE ARE RESPONSIBLE TO:

- As an employee of a publicly traded company, we must ensure that we comply with all applicable regulations related to information and insider trading.
- When in possession of internal information, we are not allowed to engage, either directly or indirectly, for ourselves or for others, on the market or off the market, in transactions related to Masan shares.
- Masan is a publicly traded company, and communications with the media or analysts can affect the Group's image or reputation or the Masan share price. Therefore, if you are asked to comment on Masan issues, you must have prior permission from the Communications Department or the authorized authority.

WE ARE NOT ALLOWED TO:

- Use internal information to buy or sell Masan securities on the financial market.
- Encourage third parties to engage in buy or sell transactions of Masan shares based on insider information known/available during employment at Masan.
- Disclose confidential information of Masan to the public.

6. INFORMATION PROTECTION

WE ARE RESPONSIBLE TO:

- Comply with all applicable data protection laws and regulations for personal data from Masan employees and customers, partners, subcontractors.
- Take all necessary measures to protect information from theft, misuse, or fraudulent use.
- Classify and manage documents according to their security level.
- Only use information for the purpose of performing our duties and for the intended as originally approved by the authorized authority (This must be strictly observed for external service providers used to process data on behalf of Masan).
- Draft a confidentiality agreement before discussing and/or providing confidential information.
- Employees must commit and sign a confidentiality agreement or set forth in an employment contract or other legal means (including the case after leaving Masan)
- Check carefully before sending any information outside (for example: documents containing confidential information or customer personal information).
- Discuss issues related to confidential information and when accessing confidential data must be careful when in public places.
- Clean up your desk, turn off your computer screen when not in use, and ensure that all documents are stored securely. All information that is no longer needed (such as correspondence, notes) will be disposed of (destroyed) securely (shredded, burned, deleted, or securely processed).
- Secure access to information on personal computers so that only authorized persons have access to that information.
- If you believe that insider information may have been inadvertently leaked or disclosed (by yourself, or by someone within Masan or by someone else), it must be reported immediately and, if necessary, Masan may investigate the leak of this information.

WE ARE NOT ALLOWED TO:

- Disclose confidential information or data outside of Masan without being properly protected (such as encrypted) or without approval.
- Disclose any confidential information of a customer to another customer.
- Profit personally from the information obtained during our work at Masan.
- Allow or facilitate unauthorized access to facilities or information systems (for example, we should not disclose our personal passwords to anyone).

7. FAIR TREATMENT AND SAFE WORKING ENVIRONMENT FOR EMPLOYEES

WE ARE RESPONSIBLE TO:

- Comply with all applicable laws on working hours, wages, including those related to minimum wage, overtime, and benefits.
- Respect and protect the legitimate rights of employees through the establishment of trade unions and collective agreements in accordance with the law.
- Encourage employees to communicate openly and honestly, share their ideas and concerns, and work with management to resolve issues related to the working environment.
- All forms of discrimination, harassment, disrespectful or inappropriate behavior, and unfair treatment are prohibited in the workplace and in work-related situations.
- Only carry out work in a safe environment. Any safety gaps at the workplace are analyzed and evaluated to eliminate the source of danger as soon as possible and maintain safety.

WE ARE NOT ALLOWED TO:

- Use child labor under the age of 16 and engage in any child labor exploitation activities.
- Require employees under the age of 18 to perform dangerous work that may affect their health and safety.
- Fail to report safety incidents or accidents.
- Use prohibited substances, drugs.
- Engage in violent and abusive behavior, including both actions and words.
- Act against behaviors that directly and/or indirectly disrupt the working environment.

8. CONFLICT OF INTEREST

WE ARE RESPONSIBLE TO:

- Comply with internal procedures when evaluating, selecting, and/or providing services, partnering with Masan partners.
 - Avoid conflict of interest situations in business transactions and services.
 - Avoid any potential conflict of interest between work and personal matters.
 - Obtain the approval of the management level before proposing/influencing job offers for family members or people with whom the employee has close personal relationships.
-

WE ARE NOT ALLOWED TO:

- Use Masan resources for personal purposes. Masan resources include tangible assets such as facilities, equipment, as well as communication systems and intangible assets such as reputation, business opportunities, etc.
- Carry out any business activities of a Masan company with any family member or with an individual/organization in which the employee/family of the employee has a relevant interest.
- Claim or accept (directly or indirectly) benefits for individuals in their capacity as employees of Masan.
- Receive directly or through an intermediary, benefits from competitors, suppliers, or customers (or do not disclose existing benefits).
- Engage in fraudulent behavior, use money, material benefits or other benefits, position, authority to influence the recruitment process leading to distortions, lack of transparency in the recruitment results.

Who must comply with the Code?

The Code applies to all employees of Masan Group and member companies (including future companies through mergers and acquisitions transactions). The term “Masan” throughout this document is understood to mean all business units within the Masan ecosystem.

In all cases, employees are required to comply with the Code and all applicable laws and regulations of Vietnam and the countries where Masan has a business presence. If the Code or law prohibits an activity, it may not be performed.

If you are unsure which law applies to you or believe there may be a conflict between different applicable laws, please consult Masan's Compliance Department or Security Department before taking action.

All contractors, consultants, joint venture partners, agents, subcontractors and anyone else whose activities are related to Masan are also required to know how to implement and respect this Code.

What does the Code require of me?

As employees of Masan, we have the responsibility to comply with the Code of Conduct in all our actions, decisions, and wherever we operate, together building a culture of voluntary compliance at Masan.

We have the responsibility to inform, explain, and guide the terms to “Third Parties” when starting work, to ensure that Third Parties understand, respect, and act in accordance with the Code of Conduct.

We have the responsibility to speak up and report any behavior that we identify as potentially or currently violating this Code of Conduct.

() Third parties within the scope of the Code of Conduct are individuals or legal entities that provide products, services, or represent Masan.*

What does the Code require of managers?

As managers, we must understand and comply with this Code of Conduct. We must also implement and promote compliance in the workplace through:

- Setting an example of compliance;
- Communicating and training on the Code;
- Encouraging employees to feel comfortable discussing a questions or concerns they have about compliance;
- Having appropriate measures in place to prevent and/or promptly address non-compliance behavior.

When you identify behavior that may/is in violation of the Code of Conduct, where do you report it?

- Your line manager.
- The company's Compliance or Security Department.
- The company's Human Resources Department.
- You can also call the hotline at: **+84 559 200 200**
or send the email to: code_of_conduct@msn.masangroup.com

We are encouraged to speak up in cases where we identify behavior that may/is violation of compliance to resolve the issue promptly. However, we need to note that intentionally providing false information will be a violation of the Code of Conduct.

The information reported above will be kept strictly confidential and Masan strictly prohibits retaliatory acts against reporters such as: unfair treatment, harassment, intimidation, preventing training and promotion opportunities, negative KPI evaluation.

How will violations of the Code of Conduct be handled?

Acts considered as violations of the Code (including but not limited to):

- Failure to comply with or engage in any act that violates the Code.
- Directing/consulting others to violate the Code.
- Failure to report known or suspected violations of the Code.
- Reporting violations of the Code in an untruthful or inaccurate manner.
- Failure to cooperate in any investigation into violations of the Code.
- Retaliation against a person who reports non-compliance.

Violations of the Code of Conduct will be subject to disciplinary action in accordance with Masan's regulation including termination of employment and do not exclude the possibility of being subject to legal action.

Our responsibility

Responsibility

Upholding our commitment to comply with this Code of Conduct requires the initiative of each of us. We all have a personal responsibility to comply with this Code of Conduct of Masan Group as well as the regulations of Vietnamese law. In case of uncertainty, we have the responsibility to consult with legal counsel, Compliance Department or other direct management levels.

Violation

Any violation of this Code of Conduct, as well as other policies, regulations of Masan or Vietnamese law, will lead to corrective or disciplinary measures, up to and including termination of employment contract.

Each of us has a duty to report actual or suspected violations to the Compliance Department.

Masan Group ensures confidentiality and no retaliation, within the scope of the law, with proactive and good-faith reports of such violations. The Compliance Department and relevant Security Department will handle each issue based on compliance with the Group's Information Security Policy. Necessary steps will be taken to ensure the confidentiality of the reporter and other employees involved in the investigation.

Scope of Application

This Code of Conduct of Masan Group was approved by the Chairman of the Board of Directors on April 26, 2024, and takes effect from the date of signing.

The content of this Code of Conduct may be amended or supplemented from time to time by the Chairman.

This Code of Conduct applies to all employees of Masan Group, all member companies, partners, and third parties of Masan.

The Code of Conduct will help us know what we must do and must not do in a proper way in our daily work; thereby creating a professional, safe, and effective working environment.

If we all implement and apply the Code of Conduct to guide our work, we will build long-term trust with society.



Code of

Conduct

Hotline: +84 559 200 200

Email: code_of_conduct@msn.masangroup.com