

	<b>POLICY ON ANTI-MONEY LAUNDERING, BRIBERY, AND COUNTER- TERRORISM FINANCING</b>	<b>Number:</b> <b>Edition: 01</b> <b>Issue date: Oct 01, 2024</b> <b>Effective date: Oct 15, 2024</b> <b>Number of pages: 12</b>
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## **CHAPTER I: GENERAL PROVISIONS**

### **Article 1. Scope of Application**

This Anti-Money Laundering, Bribery, and Counter-Terrorism Financing Policy applies to all activities and transactions of Masan Group Corporation and its subsidiaries and member companies of Masan Group Corporation (“**Masan Group**”). This Anti-Money Laundering, Bribery, and Counter-Terrorism Financing Policy aims to establish general concepts, principles, obligations, and prohibited acts across all related activities and transactions.

### **Article 2. Definitions**

In this Policy:

1. “**Sanctions Authorities**” means:

- (a) The United Nations;
- (b) The United States Government;
- (c) The European Union;
- (d) The United Kingdom;
- (e) The French Republic;
- (f) Hong Kong;
- (g) Singapore;
- (h) Switzerland; or
- (i) The relevant organizations and government authorities of any of the aforementioned countries, including but not limited to:
  - (i) The United Nations Security Council;
  - (ii) The Office of Foreign Assets Control of the U.S. Department of the Treasury (**OFAC**);
  - (iii) The U.S. Department of State;
  - (iv) Her/His Majesty's Treasury (**HMT**);
  - (v) The State Secretariat for Economic Affairs or Swiss Federal Department of Foreign Affairs;
  - (vi) The Hong Kong Monetary Authority;
  - (vii) The Monetary Authority of Singapore; and/or
- (j) Any other authority as notified in writing by the CEO of Masan Group or their duly authorized representative from time to time.

2. “**Blacklist**” includes the list of organizations and individuals related to terrorism, terrorist financing maintained by the Ministry of Public Security and the list of organizations and individuals designated as involved in the proliferation and financing of weapons of mass destruction, maintained by the Ministry of National Defense in accordance with the Anti-Money Laundering Law 2022, and related regulations from time to time. Refer to Appendix 2 of this Policy.

3. “**Sanctions List**” refers to the effective “Sanctions List” of the United Nations Security Council, the “Specially Designated Nationals and Blocked Persons” list as notified and maintained by OFAC, the Consolidated List of Economic Sanctions Targets and the Investment Ban List as notified and maintained by HMT, or any similar list that is publicly notified and maintained by any Sanctions Authority regarding sanctions. Refer to Appendix 2 of this Policy.

4. “**Bribery**” refers to the act of promising, giving, paying, or rewarding in the form of money, gifts, entertainment, sponsorships, or in any other form, directly or indirectly, to provide material benefits such as money, assets, material interests, etc., to a person in authority within Masan Group or its partners, with the intent to influence that person’s attitude and decisions to achieve financial or non-financial benefits. Bribery also includes acts of intermediating, brokering, or accepting bribes.

5. “**Sanction**” means any economic and/or trade sanctions, laws, regulations, or restrictive measures imposed, enforced, or enacted by any Sanctions Authority.

6. “**Anti-Money Laundering Law 2022**” refers to Law No. 14/2022/QH15 passed by the National Assembly on November 15, 2022, including any amendments, supplements, or replacements from time to time.

7. “**Money Laundering**” refers to the act by an organization or individual to legitimize the origin of assets obtained from criminal activities, as stipulated in the Criminal Code 2015 and the Anti-Money Laundering Law 2022, as amended and supplemented from time to time.

8. “**Masan Group**” includes Masan Group Corporation and all of its subsidiaries and member companies.

9. “**Corruption**” refers to the act of using assigned authority associated with a job position to achieve financial or non-financial benefits.

### **Article 3. Subjects of Application**

This Policy applies to all entities within Masan Group, including its subsidiaries and member companies, and extends without limitation to all departments, divisions, employees, and other relevant individuals, including those who are legally authorized or hired to perform any work or services for Masan Group.

## **CHAPTER II: DETAILED REGULATIONS**

### **Article 4. Compliance with Sanctions, Blacklists, and Prohibition on Related Transactions**

Masan Group, including its directors, management, or employees, and to the best of the Company's knowledge, any individual acting on behalf of Masan Group:

1. Shall comply fully with the Anti-Money Laundering Law 2022, any Sanction List issued by any Sanctions Authority, or any Blacklist.
2. Shall not conduct any transactions with any partner listed in, or owned or controlled by any entity listed in, or acting on behalf of any entity listed in any Blacklist, or conduct any transaction falling within any Sanction List.
3. Masan Group, including its directors, management, or employees, and to the best of the Company's knowledge, any individual acting on behalf of Masan Group, shall not conduct any transaction with any partner whose principal address is located in, established under the laws of, or is owned or (directly or indirectly) controlled by, or acting on behalf of, any entity located or organized under the laws of any country or territory that is the target of country-wide or territory-wide Sanctions.

### **Article 5. Fair and Transparent Transactions, Fraud Prevention**

1. Masan Group is committed to treating any organization or individual fairly in all financial and commercial transactions.
2. Masan Group strongly commits to conducting business ethically and in full compliance with Vietnamese laws and international agreements to which Vietnam is a party.
3. All employees, workers, and management are prohibited from engaging in or deliberately conducting any fraudulent, deceitful, misleading, or bid-rigging activities to gain financial or non-financial advantages in any financial and commercial transactions.
4. All employees, workers, and management are responsible for complying with the law and preventing and addressing fraud in all financial and commercial transactions. Any person who detects any violation must immediately report it to the designated department via phone number +84 559 200 200 or email [code\\_of\\_conduct@msn.masangroup.com](mailto:code_of_conduct@msn.masangroup.com) for immediate resolution.

### **Article 6. Provisions on Anti-Bribery, Anti-Corruption, and Anti-Money Laundering**

1. All employees, workers, and management are prohibited from engaging in or deliberately conducting any acts of Bribery or Corruption in any financial or commercial transactions, and they shall not participate in or assist Money Laundering, or engage in any business or cooperation with entities listed in any Sanction List or Blacklist.
2. Masan Group does not permit any individuals associated with partners to receive any gifts or incentives from partners, unless such acts are carried out based on standard commercial practices and are not intended to create any advantage in partner selection.

### **Article 7. KYC (Know Your Client) Procedures**

1. Masan Group complies with legal regulations on anti-money laundering, anti-bribery, and counter-terrorism financing, and fully implements client identification and partner identification procedures ("KYC") in accordance with legal and international standards. If a partner refuses to<sup>4</sup> provide information for KYC purposes, Masan Group will not select that partner.

2. From the effective date of this Policy, for the purpose of cooperation and contract execution, all partners and suppliers must provide information to carry out KYC procedures. KYC procedures are conducted in one of two ways:

- (a). Standard KYC: Applies to partners and suppliers of goods and services for regular business activities consistent with the business sectors of Masan Group, its subsidiaries, and member companies as per each company's business registration. Standard KYC requires basic information, including a Business Registration Certificate, Investment License (if applicable), and relevant sector licenses (if applicable) to identify the partner, supplier, and their legal representative whom provide goods and services for Masan Group and its member companies.
- (b). Enhanced KYC: Applies to partners and suppliers of goods and services outside Masan Group's ordinary business activities, financial transactions (not including transactions with licensed banks or credit institutions), and investments Masan Group receives or makes where the expected transaction value is from 400,000,000 VND (or equivalent in foreign currency) or more per transaction, or when required by law. Enhanced KYC includes the same basic information as Standard KYC, as well as additional information needed to identify the partner and customer, as specified in Appendix 1 of this Policy.

3. Chief Executive Officer of Masan Group (or an authorized representative) may require the Group Security Department to perform additional in-depth KYC procedures at the request of the Group's Chief Financial Officer or the Executive Board/CEO/Directors of subsidiaries or member companies.

4. Masan Group will not enter into contracts, execute transactions, or use the services of any partner if it is discovered, before or after the KYC procedure, or at any time, that the partner is listed on a Blacklist or the transaction falls under any Sanction List.

5. Each subsidiary and member company may issue KYC regulations provided they do not conflict with the standards of this Policy.

### **Article 8. Handling of Violations**

1. Any individual who violates this Policy will be subject to disciplinary actions based on the severity of the violation and the resulting damages, including:

- Reprimand;
- Extend the salary increase period for up to 6 months;
- Dismissal from position;
- Termination of employment;

In addition, violators are responsible for compensating Masan Group for all direct and indirect damages arising from the violation.

2. In the case of a serious violation, Masan Group will request the competent state authorities to handle the matter in accordance with the law, including the application of criminal penalties under the Criminal Code to both the violator and any related partners.

## **CHAPTER III: IMPLEMENTATION**

### **Article 9. Enforcement Provisions**

1. Masan Group's subsidiaries and member companies are obligated to review and align their internal regulations and related transactions to ensure compliance with this Policy.
2. For any inquiries, questions, clarifications, or advice related to this Policy, please contact the designated department at phone number +84 559 200 200 or via email at [code\\_of\\_conduct@msn.masangroup.com](mailto:code_of_conduct@msn.masangroup.com) for assistance.
3. This Policy is effective as of October 15, 2024.

**APPENDIX 1**

**PARTNER KYC FORM**

**1.1. General information for Organizational Partner**

<b>General information</b>	
Partner name ( <i>Including Vietnamese name, English name, acronym</i> )	
CID, Tax ID, Establishment license number	
Registered office address	
Business operation address / Mailing address	
Contact information ( <i>telephone, fax, email</i> )	
Website ( <i>if available</i> )	
Business operation sector	
Type of business	
Date of business establishment	
Purpose and nature of establishing relationship	
Related Persons to Masan Group, as defined by the Enterprise Law (including the business entity, full name, and position)	

**1.2. Information about Individual Partner, and the Legal Representative of the Organizational Partner**

<b>Information</b>	<b>Individual 1</b>	<b>Individual 2</b>
Fullname		
Registered permanent address:		
Date of birth:		
Nationality(ies):		
ID number/ personal identifier/ passport number (with photo, date of issue, and place of issue)		
Tax ID		
Occupation, position		
Contact telephone number, email		
Related Persons to Masan Group, as defined by the Enterprise Law (including the business entity, full name, and position), or individuals currently working at Masan, including spousal, parental, parent-child, and grandparent-grandchild relationships (both paternal and maternal).		

### 1.3. Information about Individuals Related to the Organizational Partner

<b>Information</b>	<b>Owner/member/shareholder holding more than 50% of the charter capital or more than 50% of the shares/voting capital of the enterprise.</b>	<b>Director of General Director/ CEO</b>	<b>Chief Accountant/ Accounting Officer</b>
Fullname			
Date of birth			
Nationality(ies)			
ID number/ personal identifier/ passport number (with photo, date of issue, and place of issue)			
Tax ID			
Occupation, position			
Contact telephone number, email			
Registered permanent address			
Current residence address (If applicable)			
Visa (applicable for individuals residing in Vietnam)			
Address of registered residence in the nationality country(ies)			
Address of registered residence in Vietnam (applicable for individuals residing in Vietnam)			
<ul style="list-style-type: none"> <li>- Visa number</li> <li>- Visa issuing authority</li> </ul>			9

Number of international travel documents (if any)			
Residence address in Vietnam			
Related Persons to Masan Group, as defined by the Enterprise Law (including the business entity, full name, and position), or individuals currently working at Masan, including spousal, parental, parent-child, and grandparent-grandchild relationships (both paternal and maternal)			

**2. Is the partner an individual or an organization belonging to any of the following groups?**

- Foreign-invested enterprises in Vietnam;
- Vietnamese enterprises (including types of enterprises as defined by the Enterprise Law);
- Individuals who are Vietnamese citizens;
- State-owned enterprises;
- Foreign organizations;
- Individuals who are foreign nationals;
- Other organizations (specify the type of organization, e.g., non-profit organizations, associations, etc.).

**3. Has the Partner involved in transactions, capital contributions, investments, or business operations, or having shareholders or managers who are individuals or organizations related to the Sanctions List, Sanction Orders<sup>1</sup>, Blacklist<sup>2</sup>, or have a criminal record?**

- Yes                       No

If Yes, please provide details: .....

**4. Is the partner subject to FATCA (Foreign Account Tax Compliance Act)<sup>3</sup>?**

- Yes                       No

**5. Has the partner ever been penalized (administratively or criminally) for acts of bribery, corruption, or tax evasion?**

Yes                       No

If Yes, please provide details: .....

I/We hereby certify the accuracy, truthfulness, and legality of the information and data provided to Masan Group in the KYC information form, and agree to allow Masan Group to collect, process, and share the data with third parties for the purposes of (i) communication, discussion, evaluation, and negotiation of contracts, agreements, and transactions anticipated to be signed between the Parties; (ii) fraud, bribery, and corruption prevention, and risk management; (iii) product development research and public opinion surveys; (iv) other purposes related to the business requirements and policies of Masan Group.

**ON BEHALF OF THE COMPANY**

(Sign, write full name, and affix company seal)

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<sup>1</sup> Please refer to the updated sanctions and embargoes list at:

United Nations Security Council:

<https://www.un.org/securitycouncil/sanctions/information#:~:text=Since%201966%2C%20the%20Security%20Council,Democratic%20Republic%20of%20the%20Congo%2C>

United States: <https://ofac.treasury.gov/sanctions-programs-and-country-information>

European Union: <https://www.sanctionsmap.eu/>

<sup>2</sup> Please refer to the list on the Ministry of Public Security's website at <https://bocongan.gov.vn/> and the Ministry of National Defense's website at <https://www.mod.gov.vn/>

<sup>3</sup> The "Foreign Account Tax Compliance Act" (commonly known as FATCA) was enacted by the U.S. Internal Revenue Service (IRS) on March 18, 2010, aimed at enforcing U.S. tax compliance regulations, effective from July 1, 2014. The entities required to report under FATCA include (i) organizations with a legal representative who is a U.S. citizen or a principal shareholder holding more than 10% of the shares of the organization that possesses information concerning "U.S. factors"; (ii) Individuals with information concerning "U.S. factors". Please see more details at the FATCA information site.

## APPENDIX 2

### REFERENCES

The reference list will be updated in the event of any changes to the access sources.

\* The Blacklist, Sanctions List, and Sanction Orders are updated at::

UN Security Council:

<https://www.un.org/securitycouncil/sanctions/information#:~:text=Since%201966%2C%20the%20Security%20Council,Democratic%20Republic%20of%20the%20Congo%2C>

United States Of America: <https://ofac.treasury.gov/sanctions-programs-and-country-information>

European Union: <https://www.sanctionsmap.eu/>

\*\* The lists established by Vietnam can be found on the Ministry of Public Security's website at <https://bocongan.gov.vn/> and the Ministry of National Defense's website at <https://www.mod.gov.vn/>

\*\*\* The "Foreign Account Tax Compliance Act" (commonly known as FATCA) was enacted by the U.S. Internal Revenue Service (IRS) on March 18, 2010, aimed at enforcing U.S. tax compliance regulations, effective from July 1, 2014. The entities required to report under FATCA include (i) organizations with a legal representative who is a U.S. citizen or a principal shareholder holding more than 10% of the shares of the organization that possesses information concerning "U.S. factors"; (ii) Individuals with information concerning "U.S. factors". Please see more details at the FATCA information site.