



FPT JAPAN GROUP
CODE OF BUSINESS CONDUCT



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FPT JAPAN GROUP / INTERNAL USE ONLY



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MESSAGE FROM CEO

Dear Colleague,

FJP Group has grown into a company with more than 1500 employees, including domestic business sites, development centers, subsidiaries, and Japanese language schools, based on the philosophy of always being the soba of customers.

However, we must not forget that the ultimate goal of FJP Group is not only to achieve the business of providing the best value to customers through IT, but also to include the attitude and process of how to achieve it. Corporate ethics and integrity are essential to the success of FJP Group.

The Code of Business Conduct is composed of core principles in business activities, guarantees ethics and codes of conduct, and serves as the foundation for all activities. It also defines responsibilities not only to the company, but also to employees, customers, partners, suppliers, and local communities.

Each and every employee of FJP Group must understand and comply with this Code of Business Conduct in order to act with integrity in their daily business activities.

Let us once again look back on our actions to understand, cooperate with, and comply with the Code, so that we can become a representative company of Vietnam with a fair, sustainable, and deeply ingrained culture.



FPT Japan Holdings Co., Ltd.
CEO
Do Van Khac

ABBREVIATED

The following are the abbreviations for domestic organizations in FJP Group.

The names of organizations described in this Code are subject to change from time to time.

If there is a change in the organizational name, please contact the department or LRC that has the same function for your questions.

FJP Group • FPT Japan Holdings Co., Ltd.
• Subsidiaries and affiliates of FPT Japan Holdings Co., Ltd.

FPT Group • FPT Corporation and its FPT Software Company Limited and their affiliates
• FJP Group

CEO	Chief Executive Officer of FJP Group to which the employee belongs
LRC	Legal, Risk Management, and Compliance Department
AF	Accounting Department
HR	Personnel Department
ISM	Information Security Management Department
MKT	Marketing Department
SSC	Shared Service Center
SEPG	Software Engineering Process Group Department (belonging to FPT Software Co., Ltd.)

Reference channel

Internet: <https://www.fpt-software.jp/fpt-code-of-business-conduct/>

This Code will be published in Japanese, English, and Vietnamese. In case of discrepancy between these versions, the Japanese version will prevail.



FUNDAMENTAL PRINCIPLES- CORPORATE ETHICS AND SINCERITY-

Understanding corporate ethics leads to the *raison d'être* of FJP Group and the foundation for sustainable development.

It is regarded as an important duty to realize a long-term strategy while pursuing pioneering, passion, responsibility, cooperation, and quality.

FJP Group's corporate culture is based not only on ethical behavior and the integrity of business operations, but also on relationships of trust not only within the company but also with outside parties.

This is also a credo for FJP Group to guarantee sustained success. In today's economic situation, the concept of integrity is no longer confined to pure ethical values, but must be viewed as a set with business.

FJP Group, together with its customers, partners, suppliers (collectively referred to as "business partners") and commitment to responsibility in its relationship with society, establishes this Code on the basis of ethical behavior and the integrity of business operations to improve long-term productive profitability.

This Code will guide each employee to act as a representative of FJP Group.

➔ **What is integrity?**

Integrity refers to your own mindset to take the right action, not only when someone is watching or monitoring your behavior, but also when nobody knows what you are doing.

The spirit of integrity leads to voluntary action, self-discipline, and conformity to social and corporate ethical standards.

1.1 **Scope of the Code**

This Code applies to all employees of FJP Group. "Employees" refers to all employees who work within FJP Group, including FJP Group executives (both inside and outside the company), employees, part-time workers, part-time workers and temporary workers.

This Code sets out a basic policy for all operations in FJP Group. Your actions and manners must comply with the following items under any circumstances.

- (1) Compliance with Laws and Regulations
- (2) Compliance with the Code
- (3) Compliance with cultural and ethical standards

If you feel that the actions or manners of yourself and other employees may not meet even one of the above items, go back to this Code and seek support from **your direct manager** or **LRC**.

1.2 **For compliance with the Code**

Employees are required to comply with this Code and are obliged to:

(1) **Employees**

Employees must perform their work with full understanding of this Code.

Therefore, employees are required to verify the content of this Code through training or tests conducted by FJP Group. Failure by employees to confirm the Code does not constitute a waiver of the obligation to comply with the Code.

(2) **Manager**

Managers refer to the managers in FJP Group.

Managers must develop the corporate culture within FJP Group and departments and encourage and support employees to comply with business discipline and ethical standards.

Managers must also be a good model for employees to comply with the Code, and they must comply with the following:

- We will make our employees understand the contents and responsibilities stipulated in this code and the rules of FJP Group.
- Continue to communicate the importance of compliance and ethics to employees.
- We will establish an environment for reporting negative actions and problems in our operations.
- We will take responsible and appropriate actions to prevent employees from behaving in violation of this Code.

- As part of the performance evaluation, we evaluate employees' compliance with the Code and FJP Group rules.

Managers are also responsible for responding to employee inquiries and questions regarding compliance issues. In order to provide the appropriate response, you must investigate the details of the relevant information, and you can either respond directly to employees in the process or request support from **LRC** if you are not confident with the response.

(3) Internal, External, and Officer Directors

An officer, including a director, may assume office after obtaining the approval of the formal board of officers. You must obtain approval even if you are assigned multiple times after your term of office has been completed.

Officers, etc. must be aware that they are recognized by FJP Group for the execution of their duties, and must carry out their duties with responsibility and self-awareness.

Execution of business operations shall be in accordance with the rules of officers.

1.3 Scenes where consent is required

If an approval or approval is required under the circumstances set forth in this Code, please contact **your direct manager, department in charge** or **LRC** for support.

In addition, if the situation continues, approval needs to be followed by an extension procedure every year.

1.4 Consideration model when ethical decision is required

In the face of ethical challenges, it is difficult to make the right decision that many factors are involved. The following review models will help you make decisions that are appropriate to the ethical standards of FJP Group.

(1) Predict a problem:

- What are the problems you might encounter?
- Do you understand the causes associated with the problem?
- Can you predict the impact of the decision you are trying to make?

(2) Find Solution :

- Does the statute prescribe for your problem?
- Do the norms provide guidance for your problems?
- Do you understand the policies and related procedures?
- Have you learned about solutions to similar problems based on past experience?

(3) Observance of rules :

- Are you able to comply with laws and regulations and this code?
- Do you understand how failure to comply with laws and regulations and this Code will affect yourself, FJP Group, and the relevant parties?

(4) Acceptance of advice:

- Did you consult **your direct manager**?
- Did you consult with **the relevant department** or **LRC** dealing with your problem as needed?
- Can you make appropriate decisions based on advice from **the managers, the relevant department** and **LRC**?

➔ Regarding laws and regulations

Since FJP Group operates its business globally, its employees must comply with the laws and regulations of each country. In some countries, it should be noted that the national law also applies to business activities and employees outside the country.

If you are unclear or if there is a conflict between the law and this Code, contact **LRC**.



RESPECT FOR HUMAN RIGHTS

An environment in which the human rights of others are respected is essential for the FJP Group to achieve sustained success. Therefore, all officers and employees of the FJP Group will comply with the following principles, and aim to build relationships of mutual respect with other officers and employees, as well as external relationships such as business partners. We also ask our suppliers and business partners to respect the following principles.

(1) Respect for international norms

We respect international norms such as the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, and the Ten Principles of the United Nations Global Compact, and comply with them in our corporate activities.

(2) Respect for human rights at work

In any case, we will prohibit child labor and forced labor and realize a working environment that does not violate human rights.

(3) Respect for freedom of association and the right to collective bargaining

We respect the freedom of association and the right to collective bargaining based on the free will of our employees.

(4) Prohibition of Discrimination

We prohibit discrimination, attacks, harassment, and other acts that harm the dignity of individuals based on race, nationality, origin, age, gender, gender identity, religion, creed, disability, physical characteristics, or other reasons that are completely unrelated to the performance of work.

(5) Respect for diversity

We will respect the culture, customs, history, values, individuality, and diversity of countries and regions, and act with consideration for those involved.

(6) Prohibition of harassment

Power harassment, sexual harassment, or other behavior that exceeds the appropriate scope of work against the background of superiority in the workplace, such as job status or human relationships, causing mental or physical pain to other employees, any harassing behavior that harms the work environment is prohibited.

(7) Stakeholder engagement

Engage with stakeholders such as employees, suppliers, business partners, and local communities through dialogue and events such as exhibitions.

(8) Implementation of human rights due diligence

We conduct dialogues and surveys with employees, suppliers, and business partners, and conduct human rights due diligence to identify, assess, prevent, and mitigate risks of human rights violations.

(9) Remedy and Prevention

In the event that human rights are actually violated, or if it becomes clear that there is a risk of such violation, we will correct and remedy the situation through appropriate procedures, such as taking disciplinary action in accordance with the employment regulations. In addition, we will prevent human rights violations through regular training and other enlightenment activities in order to prevent recurrence.

➔ What is harassment?

Harassment means behavior that annoys or troubles someone. It is prohibited to carry out harassment not only to people in the company but also to people outside the company.

What is important in defining harassment is that irrespective of what the actor thinks, if the other person has unpleasant feelings, it becomes harassment. However, if objectively justified, it will not constitute harassment.

➔ Examples of harassment

- Forcing things that are obviously unnecessary or impossible to carry out in business (power harassment)
- Carrying out obstructions to work (power harassment)
- Excessive entry into private matters (power harassment)
- Forced private chores that are not related to work (power harassment)
- Sexual joking and showing sexual interest (sexual harassment)
- Inquiring about sexual facts (sexual harassment)
- Harassment for pregnancy or childbirth (Matahara)

➔ Harassment under the Work Rules

FJP Group has declared the definition and prohibition of the following harassment and is subject to disciplinary punishment, including disciplinary dismissal.

- Power harassment
Conduct that causes mental or physical distress to other employees or harms the work environment by speech or behavior that exceeds the appropriate scope of work due to superiority in the workplace, such as job position or personal relationship.
- Sexual harassment
An act that causes disadvantage or discomfort to other employees or harms the work environment through sexual words and deeds.
- Maternity Harassment, etc.
Conduct that interferes with other employees' pregnancy, childbirth, childcare, or family care, and the use of leave or measures based on these words and deeds, thereby harming the working environment of such employees.



RELATIONSHIP WITH THE COMPANY

3.1 Work Environment

FJP Group will build and maintain a work environment based on the following principles.

(1) Safe, hygienic workplace

FJP Group expresses its commitment to providing a hygienic and safe workplace with the aim of minimizing the damage (both tangible and intangible) of its employees and hence FJP Group. To this end, employees must comply with FJP Group's safety and health regulations and ensure that they do not fail to exercise safety precautions in their daily lives. In the event of accidents, injuries, or hazardous materials, employees must immediately report to their immediate managers, HRs, and SSCs.

In addition, in order to ensure the safety and security of employees, measures related to disaster prevention and emergency response We will also take an active part in this endeavor.

→ Safety and Health

FJP Group ensures and improves the health and safety of its employees and takes necessary measures to create a safe and comfortable workplace. Employees must also cooperate with the company's safety and health directives, strive for self-health, and work in good health. For this purpose, the following conditions must be observed (excerpt from the Work Rules).

- Follow safety and health regulations and company orders and instructions.
- To keep the workplace in good order and prevent disasters, such as not placing articles in passages, evacuation doors, or where fire extinguishing facilities are located.
- Smoking should not be carried out outside the predetermined area.
- Do not enter prohibited or prohibited areas.

(2) Creating an Attractive Workplace Environment

With the diversification of working styles, FJP Group will work to create a work environment in which employees can fully demonstrate their abilities.

(3) Active work environment

FJP Group aims to create a workplace environment where employees can take on challenges with a sense of improvement. To this end, employees, as members of FJP Group, must actively cooperate in creating a work environment and comply with ethical standards, integrity, and fairness. In addition, words, actions or acts that may have an aggressive and negative impact, such as depriving them of their aggressiveness, are prohibited.

→ Safety and Health

The following actions are prohibited because they seriously adversely affect the workplace environment of FJP Group.

- Violence and intimidation against other employees
- Possession of something that may injure other employees
- Intimate relationship between managers and subordinates that disturbs workplace morale
- Excessive gifts and gifts (regardless of superiors, subordinates, or colleagues) aimed at personnel evaluations and personal business benefits
- Use, sell, trade or possession of alcoholic beverages or illegal drugs during working hours
- Words and actions that isolate other employees

3.2 Reporting and storage of appropriate records

Records of operations, financial records, personnel records, and other records necessary for performing duties are important information that not only serves as a basis for FJP Group's management decisions, but also for the fulfillment of rights and obligations with relevant parties.

Accordingly, employees must report documents and records in a timely, sufficient, and appropriate manner. Intentionally providing wrong records or information or falsifying documents is considered a violation of this Code.

- Records of transactions shall be faithfully recorded and retained by the division in charge.
- Records relating to financial affairs should be recorded and kept accurately and faithfully.
- Personnel records shall be accurately and faithfully recorded and kept and personal information shall be handled with sufficient care.
- Sufficient and appropriate documentation should be provided in the estimation, transaction, and profit calculation.
- The report to be submitted to the administrative organ shall be accurate.
- Not based on injustice or unfair trade.
- It is not based on activities related to tax evasion or local law violations.

Examples of violations of proper records

- To write a report ignoring or concealing unfavorable data in order to achieve the goal.
- Record fictional performance data throughout the project without reflecting actual performance.
- To engage in private activities during working hours;
- To record the amount of fictional transactions.
- That the applied settlement cost is different from the fact.
e.g: When returning to Vietnam due to family problems, bill them as business trip expenses.
e.g: Charge for transportation expenses when using a taxi for personal use.
e.g. To work overtime for study unrelated to work and apply for overtime.

3.3 Protection and proper use of assets

The assets of FJP Group include **tangible assets** (money, machinery, equipment, vehicles, etc.) and **intangible assets** (intellectual property, confidential information, working hours, network systems, software, etc.).

Examples of assets

- Funds
- FJP Group's products
- Laptop, monitor
- Network systems, software and applications
- Outsourcing services and cloud services
- In-house information (guidelines, regulations, information on in-house tools, etc.)
- Customer information we manage during the project period
- Trademark
- Fixed-line phones, company phones, copiers, and other communications devices
- Office stationery
- Company car
- Offices, company housing

When using the company's assets, you need to observe the following principles:

- (1) As an employee, you must be conscious of protecting assets provided by FJP Group to avoid loss, damage, or abuse.
- (2) The assets of FJP Group shall only be used for business purposes and for the benefit of FJP Group.
- (3) Don't make personal gains through the assets of FJP Group or through the opportunities you get from your job or information.
- (4) Do not use assets illegally and unethically.
→ Theft, embezzlement or misappropriation of property or fraudulent reporting or misappropriation of property is subject to dismissal or punishment in criminal proceedings.
- (5) We will comply with all requests and instructions regarding assets by FJP Group or third parties, and will appropriately protect and use the assets.

If the assets of FJP Group are at risk, we will immediately report them to **the direct manager** or **SSC** (for tangible assets), **ISM** (for information assets, network systems and software) or **LRC** (for others) in order to request an appropriate resolution.

Example of abuse

Employee A installed the software X of FJP Group on a PC that was privately owned by B upon request from a colleague B.
→ A illegally uses Software X, which is an asset of FJP Group.

3.4 Use of information

As FJP Group is a company operating in the information technology field, information is a very important asset. Employees are responsible for protecting the confidentiality of information about FJP Group, including transaction information, project information, product technical information, and employee personal information.

Example of FJP Group's classified information

- Employee's personal and salary information
- Contract information
- New inventions, products and services
- Information on projects provided by suppliers
- Suggestions and Quotations for Suppliers
- Operating plans, strategies, acquisitions and mergers
- Financial Information

Violations to information security regulations and leakage of confidential information can result in damage to FJP Group's interests and transaction competition, as well as adverse impacts on FJP Group's relations with suppliers.

Accordingly, the following requirements must be complied with in the receipt, use and handling of confidential information.


- (1) Confidential Information shall not be disclosed to any third party except for the purpose of using such information.
- (2) When using confidential information, the purpose of use shall be clarified and a confidentiality agreement shall be concluded.
- (3) Confidential Information shall be disclosed only to the minimum number of employees who need to use such information, and shall not be disclosed to other unrelated employees.
- (4) Employees are obliged to maintain confidential information whether or not they are on duty or not, and whether they are in office or not.

If you use or disclose information about FJP Group or other companies without permission, it will not only be unethical, but also lead to contract violations and violations of laws and regulations.


The non-disclosure obligation is stipulated in FJP Group's Information Security Rules and Personal Information Protection Rules.


Question:

 **How do I deal with payroll payment data if I receive it by email by mistake?**

 Because there is no reason to receive or use such information, you must notify the sender of the mistransmission and the recipient must immediately delete the email.

If the recipient discloses this information, it is considered a breach of confidentiality obligations.

 **Is it acceptable for SE to consult with previous colleagues to develop software?**

 SE has unnecessarily disclosed the information and is considered a breach of the non-disclosure obligation

3.4.1 Confidentiality of personal information

FJP Group collects and manages personal information about employees, such as attendance, salaries, bonuses, and health conditions. FJP Group needs to expand the information to the FPT Group as it is developing as a global company. Even in such cases, the personal information of employees must be carried out carefully and responsibly in a manner that meets the requirements in accordance with legal regulations.

Employees in charge of handling personal information and data shall comply with the following requirements

- (1) We will carry out work related to personal information in accordance with laws and regulations.
- (2) We will comply with the obligation of confidentiality of personal information in accordance with the related agreements.
- (3) We will acquire, use, and archive personal information for business purposes only within a reasonable time. Limits access to and sharing of personal information and data.
- (4) Ensure that employees with authority to access and share personal information and data understand and comply with confidentiality obligations.
- (5) As necessary, the owner of personal information and data can view and modify his or her personal information and data held by FJP Group.
- (6) We strictly control information and data to prevent information and data from leaking or being disclosed.

The confidentiality obligations for personal information are stipulated in FJP Group's Information Security Rules and Personal Information Protection Rules.

3.4.2 Disclosure of Responsible Information

It is no exaggeration to say that the operation of FJP Group is under the supervision of people around the world.

In particular, information published on the Internet is monitored not only by colleagues, but also by business partners, governments, and government agencies. Once you publish information to the Internet, you cannot delete or change it because it is duplicated, shared around the world, and may be displayed on the Internet for a long time.

Therefore, the information published or announced on the Internet and the information answered to the interview, etc. should be taken with great care not to confuse the person who received the information.

Therefore, the following principles shall be followed.

- (1) Posting and disseminating information on social networks or forums must take necessary precautions, not including expressions that represent the FPT group.

- (2) You can speak and post only if it is approved by **MKT** or only through **MKT**.
- (3) You should pay the necessary attention when discussing other people in the forum or speaking about yourself.
- (4) Do not disclose information that may cause others to become uncomfortable or pessimistic.
- (5) In relation to the use of social media, we will follow the rules and guidelines of the FPT group.
- (6) If you are asked to provide FPT group information to a third party, we will not be able to contact or reply to those inquiries without the approval of **MKT**.

3.5 Intellectual Property

FJP Group must respect and protect the copyrights, patents, utility model rights, industrial property rights, and know-how of the FPT Group (hereinafter referred to as "intellectual property rights"), recognize the importance of the intellectual property rights of third parties, and endeavor not to infringe such rights.

3.5.1 Disclosure of Responsible Information

When doing transactions, you need to be careful about protecting the intellectual property rights owned by the FPT group.

All software created while working in the FPT group is protected as the intellectual property of the FPT group.

As for the use of the software on the job, it should be approved by **the direct manager** or by **LRC** as necessary. In addition, when using the software owned by FPT group in a commissioned project, we must notify the other party in advance.

Question:

? Employee A was developing software X in the FPT group. Soon after, A was involved in the development of the customer's software Y. Software Y is similar to software X, so software X was used. However, we did not notify the customer in advance about the fact that software X was independently developed before the start of the development work for software Y.

... In this case, FPT Group may have to grant the intellectual property rights of Software X to the customer.

3.5.2 Third-party software

Use of third-party software, including open source software, requires caution. Software includes programs, databases, and documents. The software is then stored on a physical device (such as a CD, publication, or other device) or can be downloaded and accessed online.

By granting a software license, users have the rights and obligations to use the software. The terms of the License Agreement must be complied with as to whether the Software can be modified or diverted.

If you download software from a source on the Internet to a computer or device in an FJP group, you must obtain **ISM** approval. You must also follow the required processes before distributing, accessing, or receiving software from inside or outside your organization.

3.5.3 Open-source software

The use of open source software licenses may lead to conflicts of interest or inappropriate transfer of FJP group intellectual property. If you are developing or using open source software, you need to contact **SEPG**, follow its guidance to obtain the approval of **the specialized department** and also need to obtain the approval of the business partner.

3.5.4 Trademark

Employees must be aware that trademarks of the FJP Group and other companies should be used in an appropriate manner for business purposes.

For FJP groups or third-party trademarks, you may request support from **MKT**.



BUSINESS OPERATIONS WITH HONESTY AND INTEGRITY

FJP Group, together with its business partners, aims to build a relationship of trust based on fairness and ethical behavior.

4.1 Protecting Customer Information

Employees must always endeavor to appropriately use and manage information on business partners, including personal information. Therefore, FJP Group must maintain confidentiality of the account information at the following level.

- (1) FJP Group shall comply with the confidentiality rules and personal information protection rules of FJP Group, contracts with business partners, and legal regulations, and shall protect business partner information.
- (2) Personal information of business partners shall be used only for business purposes on reasonable terms and conditions.
- (3) Implement the return, disposal, and removal of customer information in accordance with FJP Group's confidentiality regulations and personal information protection regulations as well as contracts with customers.

4.2 Fair Trade

FJP Group complies with competition laws and regulations in all countries where it operates and maintains fair and free competition. You can seek **LRC** support to understand local competition laws.


Employees shall obtain, use, and share information from competitors only when they are in compliance with legal and ethical standards, and shall not engage in any of the following activities.

- To acquire information through illicit means such as theft, fraud, and threats.
- Use or disclose information for unauthorized purposes.
- Receiving, using, or disclosing information while knowing that it has been involved in improper disclosure.

For more information, please refer to **Basic policy on compliance with Competition law**.

Question:

 We hired employee B, who previously worked for competitor A, in FJP Group. Can I hear A's business information from B?

 You need to be careful when a non-disclosure agreement is signed on A and B. Please contact LRC for details before you ask B for information.

Even in procurement activities, we must implement the purchase of goods and services and the selection of suppliers based on actual needs, quality, appropriate prices and standards, and we do not permit procurement based on personal or rebate commissions that hinder the company's interests. If you are responsible for selecting or negotiating a supplier, you will need to comply with the procurement rules of FJP Group.

For more information, please refer to **Basic policy on Procurement**.

4.3 Anti-Corruption

Legislation on bribery is enacted in many countries to prevent individuals and organizations from obtaining operational benefits from unjustified or inappropriate measures or making payments or valuable gifts to the authorities.

To develop business activities based on integrity, FJP Group needs to comply with the following:

- (1) In order to conduct business under fair and free competition, we will never allow bribery or corruption, and will thoroughly prevent corruption.
- (2) We will not give or receive gifts or entertainment that exceed socially acceptable limits, which will serve as a breeding ground for bribery and corruption.
- (3) We will build sound and appropriate relationships with not only our business partners but also politicians and administrators.

What is bribery?

Bribery means sending or receiving fraudulent rewards for work. Not only cash and gifts, but also business opportunities, employment opportunities, and other conveniences, as well as fraudulent practices, can be subject to disposal.

Employees shall comply with the following rules and regulations of FJP Group on gifts and entertainment for entertainment, gifts and other privileges and, if excessive or expensive, must report to the LRC.

(1) Gift


- Do not send or receive gifts to or against promises or actions that bring benefits to suppliers, governments, administrations, etc.
- Do not send or receive payments equivalent to cash with discount coupons or gift certificates to business partners, governments, governments, etc.
- Do not send or receive gifts that exceed socially acceptable limits to business partners, governments, governments, etc.


(2) Dinners, amenities, and other perks


- Do not send or receive socially acceptable meals, amenities, or perks to promises or behaviors that benefit suppliers, governments, administrations, etc.
- Do not directly or indirectly propose external payments (kickbacks) to suppliers, governments, administrations, etc.
- If you have received an invitation to a tour or event, you should consult **your direct manager** on the importance of such participation.

Question:

 A commemorative medal was presented on the anniversary of the company's founding. Can employee A receive that gift?

 Yes, A can.
However, if the medal is expensive, please consult your direct manager and LRC.

 Employee B was offered a domestic trip with accommodation by the supplier. Can you agree with it?

 This falls under excessive entertainment. Consequently, consent will be in violation of this Code.
If you receive such an offer, you will need to report it to **your direct manager** and **LRC**.

For more information, please refer on Basic policy on Bribery prevention.

4.4 Conflict of interest

Employees must act for the greatest benefit of FJP Group. Conflicts of interest arise when you are unable to act for the benefit of FJP Group, prioritizing personal and family interests.

Under all circumstances, we need to comply with the principle that actions and decisions must be made for the benefit of FJP Group on an objective, independent basis.

4.4.1 Model for dealing with conflict of interest situations

If you notice that a conflict of interest is occurring or may occur, you should immediately consider and select the appropriate response according to the following steps:


- (1) Confirm potential conflicts of interest.
Refrain from participating in potential conflicts of interest as much as possible.
- (2) Avoid discussions, votes on decisions, or access to information related to conflicts of interest, for example. If this situation occurs frequently or if there is a possibility of continuous conflict of interest, you need to consider other options.
- (3) If you are unable to refrain from participating in a conflict of interest, or if non-participation is unable to resolve the possibility of conflict of interest, have the **LRC** join the review meeting to visualize the decision-making process and maintain integrity and fairness.

4.4.2 In-house activities


Employees must comply with the general principles in order to avoid conflicts of interest in the performance of their work.


Question:


 My job is to hire engineers. The hiring candidate this time is my husband's younger brother. What do I need to be careful about?

 In this case, hiring relatives may prioritize the benefit of the family and discourage "hiring the best candidate for FJP Group." Therefore, we will immediately report this situation to **the direct manager** and request the change of the person who will make the evaluation and selection. You can also ask **LRC** for advice.

 I work in the recruitment department of FJP Group. My boss's relatives are the candidates for this hiring. What do I need to be careful about?

 If this is the case, your decision may be interfered by your supervisor. Therefore, we request that an independent third party participate in order to immediately protect the integrity of the decision-making process regarding this situation and ask the **LRC** for advice.

 In my department, there is Employee A, who is a relative of the manager. And we need to evaluate the achievement of A. What do I need to be careful about?

 Evaluation must be conducted objectively and fairly. In this case, there is a risk of conducting an evaluation that is not based on A's performance. For this purpose, independent third parties shall be invited to participate in the evaluation process to monitor and confirm and seek advice from **LRC**.

4.4.3 External activities

Employees should not conduct activities that adversely affect FJP Group, such as business performance, reputation and image of FJP Group, or leakage of classified information. Therefore, prior **HR** approval shall be obtained in the following cases.

- Assuming an officer of a business partner or engaging in business;
- To start a company in the same industry and conduct transactions with FJP Group.

4.4.4 Relatives and friends

If an employee's relatives are working or investing in an FJP group's suppliers, you must ensure that the relationship does not adversely affect FJP Group.

What are relatives?

A relative is a generic term that combines the following: ① a blood relative, such as a spouse, parents, siblings, grandparents, descendants, parents-in-law, a wife of a son or daughter's husband, and ② a relative of a spouse who has formed a connection through marriage.



RELATIONS WITH SOCIETY

5.1 To stamp out anti-social influences

FJP Group will always conduct its business with a sense of integrity and ethics in its business operations, in order to become a company that is trusted by society as well.

- (1) We will deal with anti-social forces and organizations in Japan and overseas that pose a threat to social order and sound corporate behavior with a resolute attitude, and will thoroughly prevent any relations, including transactions, with them.
- (2) We will not make any betrayal transactions or provide any funds to anti-social groups or groups in Japan or abroad.
- (3) For employees involved in anti-social forces and organizations, we will work with the police and other external organizations to respond systematically and legally.

5.2 Preservation of the environment

Environmental protection is the responsibility and duty of FJP Group and each employee.

Employees must strive to participate in environmental protection activities, while managers must promote appropriate measures and education to raise employee awareness of environmental protection. We will also minimize environmental waste through the following activities in our daily operations.

- (1) **Reduction of Environmental Impact**
 - Reduction of plastic shopping bags by distributing original eco bags
 - Reduction in the use of paper cups by promoting the use of my cups
 - Efficient use of energy by conserving water and electricity
- (2) **Responding to Climate Change**
 - Promotion of greening in offices
 - Introduction of Cool Biz and Warm Biz
- (3) **Effective use of resources**
 - Recommended paperless
 - 3R activities (waste reduction, reuse, and recycle)

➔ Question:

- ❓ My brother works at A, a company specializing in office supplies, but his brother is still in contact with FJP Group. I haven't pulled it out. I recently moved to the procurement department. What should we do?
- 💬 Since the relationship between A and you may affect the procurement of office supplies for the company, we first need to notify **the direct manager**. Before doing business with A, we will take an appropriate estimate and decide on the source. If we cannot solve the risk of conflict of interest with these solutions, we need to stop dealing with A company.

5.3 Social Contribution

FJP Group aims to create an affluent and sustainable society by utilizing IT to make positive contributions to local communities and society, which are the foundation of a company's existence, and to coexist with diverse stakeholders, including local communities, as a corporate citizen.

→ Corporate Philanthropy

Companies engage in activities not only with employees and shareholders, but also with a wide range of people in the world (stakeholders, stakeholders), including business partners, local communities, and society at large.

CSR (Corporate Social Responsibility) is not only a priority on immediate profits, but is also an activity to build a sustainable future together with society as well as to grow for a long time by building good relationships with the stakeholders surrounding the company.

FJP Group must take the following responsible actions in accordance with the CSR Activity Policy.

(1) Be aware of social responsibility

Officers, managers, and employees of FJP Group need to be aware that CSR belongs to the company in order to fulfill their corporate social responsibilities.

(2) Contribution through business operations

In addition to providing safe and high-quality products and services through our business activities, we will work to solve various environmental and social issues and contribute to the creation of a safe, secure, and prosperous society.

(3) Working Together with Stakeholders

In order to realize a better society, as a corporate citizen, we place importance on communication with local communities and other members of society, and will actively promote activities that contribute to society.



THOROUGH IMPLEMENTATION AND SELF-INSPECTION OF THE CODE

6.1 Reporting risks and violations

Employees are responsible for understanding and executing this Code. Any infringements must be properly reported or discussed to FJP Group for pre-prevention and post-response.

Employees must proactively report and contribute on the following issues:

- (1) Issues related to law violations;
- (2) Issues related to violations of this Code, company rules, internal regulations, ...;
- (3) Issues related to human rights violations, including harassment;
- (4) Work environment disturbance problems;
- (5) Issues related to unauthorized use, fraudulent reporting, fraudulent reporting of assets, company records;
- (6) Issues related to competition law violation leading to hindering fair competition transactions;
- (7) Issues related to bribery and corruption;
- (8) Issues related to conflicts of interest;
- (9) Issues and questions related to regulatory compliance.

Any such risks or violations should be reported below.

- **Direct manager**
- Mail to: FJP.compliance@fsoft.com.vn
- Hotline: **03-6634-6868** (to **LRC Administrator**)
- Submit anonymously to **LRC's letter box**.
- Report to Company's homepage

The following policies apply to reporting:

- (1) Personal information and the contents of the report of the reporter shall be protected as confidential information.
- (2) Reported information will only be used within the scope of verification and resolution objectives.
- (3) In order to provide accurate conclusions and appropriate solutions, we will record all information about the reporting and implement the necessary solutions based on detailed research.

- (4) Retaliation or disadvantageous treatment of the reporter is prohibited, and if such conduct is discovered, it is subject to disciplinary action as a violation of this Code.

For more information, please contact **Compliance consultation contact point**.

6.2 Measures Against Violations

If you violate this Code, adversely affect your work efficiency, deteriorate your work environment, or cause damage to the business of FJP Group, your employees (regardless of individual or group) may be subject to legal measures such as disciplinary punishment including dismissal or claims for damages.

Misleading allegations

Violation reports that interfere with other employees or disseminate inaccurate information are prohibited.

Any misleading allegations, false responses, or refusal to cooperate with the investigator will be considered a violation of this Code.

6.3 Periodic inspections

The responsibility of this Code shall be **LRC**, and the contents of this Code shall be reviewed regularly and revised as necessary.

We will also conduct regular in-house education in order to establish and improve the awareness of our employees.

In addition, **LRC** and **related departments** periodically check whether regulations and procedures related to this Code are properly conducted in accordance with relevant laws and regulations, and strive to raise awareness of the entire FJP Group.



FPT JAPAN GROUP
CODE OF BUSINESS CONDUCT