



# ANTI-MONEY LAUNDERING POLICY



FPT Software Co., Ltd and its subsidiaries (hereinafter referred to as “FPT Software”) have issued the “Code of Business Conduct” to promote ethical and lawful business practices, and maintaining money laundering prevention is one of its key objectives.

With the aim of strengthening money laundering measures in response to the tightening regulations on fraud in each country, this policy intends to enable us to continue conducting business activities globally and become a trusted company in society.

## 1. Objective

The purpose of this Anti-Money Laundering (AML) policy is to prevent, manage, and significantly mitigate the risks associated with actual or potential money laundering activities or financing of terrorism for FPT Software and its employees directly or indirectly involved in such activities.

## 2. Scope of Application

This policy applies to FPT Software. The AML policy applies in all countries where FPT Software has a commercial presence. In case the local laws and regulations require a higher standard, that standard will be followed.

## 3. Definitions of Money Laundering

Money laundering is the act of organizations or individuals attempting to legitimize the proceeds of crime.

## 4. Obligations

- FPT Software shall comply with the anti-money laundering laws and regulations of the countries and regions where it has commercial presence.
- All employees shall make efforts to avoid engaging in any transaction that they know or suspect, or have reasonable grounds to suspect, is related to money laundering.
- All employees have an obligation to cooperate with government authorities in anti-money laundering efforts, if required.

## 5. Education and Training

Comprehensive education, training, and awareness programs will be provided to ensure understanding and compliance with money laundering prevention regulations.

## 6. Monitoring and Regular Assessments

Regularly conduct audits and risk assessments to review internal regulations, internal controls, and this policy from a competition law compliance perspective. Implement necessary improvements based on audit findings.

## 7. Handling Violations

- Establish a Compliance Council to promptly and appropriately address any indications or violations of competition law requirements, including this policy, in accordance with the regulations of each country, region, internal rules, and third-party agreements.
- Violations of competition law requirements or this policy will be handled promptly and appropriately in accordance with internal regulations and/or administrative or criminal sanctions under applicable laws.

