

Welcome to the

Code of Professional Conduct & Ethics

The Code of Conduct empowers each employee to be a good representative of the organization

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A Message From **Leadership**



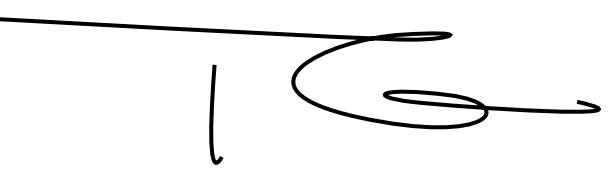
FPT Digital is an inspiring place and accompanying customers in self-structure, transforming, developing and creating breakthroughs in business and operations. Towards our members, FPT Digital empowers individuals to become the best of themselves.

We are the pioneering organization in Digital Transformation, working towards the creation of breakthrough values for our clients, contributing to the rise of enterprises in the global business map. With that value proposition, we believe to create positive social impact as well as the most professional working environment.

To achieve that, we follow the practice of creating and complying to the code of conduct and ethic of FPT Digital. Our rules are built on the foundation of positioning ourselves as a professional organization, always lead and strictly complies with the highest legal and ethical standards. The codes are approved by our Board of Directors and applied throughout the organization, from the Board of Directors down to every employee. Meanwhile, we hope that our partners such as contractors, advisors and suppliers would understand and act accordingly during our collaboration.

We also hope these codes would be absorbed by every member of the organization, to become a crucial part of what we do every day, what we believe in, how we live and operate the company. From there on, each employee shall become a representative of the company and every behavior, work is assured with professionalism, consistency, and value transmission in every circumstance.

On the other hand, we also hold our code of behavior in situations related to legal or code of behavior for concerning partners to ensure that our operation is always consistent and up to standard. That is how we build our reputation and maintain our proposition in the market. That is also how we unite, unify and complete ourselves towards the goal: FPT Digital – Imagine. Innovate. Lead.


CHIEF EXECUTIVE OFFICER
TRAN HUY BAO GIANG



Introduction

To the Code of Professional Conduct and Ethics

Our Code of Professional Conduct and Ethics provides the instructions on guaranteeing our values and policies in operation, promoting the culture of compliance and ethical behaviors that are consistent throughout the organization. Our codes guide us towards the right direction and create the highest values for clients along the path of exploiting the digital technology resources and inspire clients to be proactive in self-structuring, transforming, developing, and breaking through in business operation as well as building organizational reputation and professional environment for development, holistic and engaging for individuals.

The Code of Professional Conduct and Ethics that we believe and apply in our every day lives including:

- 01 Creating the highest values and accompanying clients in the process of potential exploitation
- 02 Accreting inspirational and professional human development working environment
- 03 Accompanying and collaborating on resource sharing and development opportunity with partners
- 04 Serious on performing social responsibility
- 05 Asset protection, law compliance and anti-corruption

Creating the highest values and accompanying clients in the process of potential exploitation

We understand that being selected by clients is our honor. It showed that clients put trusts in our services and reputation of FPT Digital. Creating breakthrough values for clients through our objective consultation, specific and useful as well as ensuring the information confidentiality are the prerequisites we strive to achieve, to maintain the trust of existing clients, to open new collaboration opportunities with prospects while establishing the reputation and steadiness of the organization.

Each individual is required to comply with those codes during the process of bringing values to the clients.

Providing consulting values that are appropriate with enterprise expectation

As a consulting service provider, our responsibilities are exploiting and promoting all of client's potentials via digital technologies throughout the digital transformation consulting cycle. We understand the clients, we are equipped with leading domain and technology experts, to create positive, long-term impacts in business and operations of enterprises.

We also understand that, in consulting industry, reputation and consulting values are the biggest properties of the firm. Hence, every member of the Board of Directors as well as employees commit to put the benefits of clients on top, and not to let other benefits interfere and hand over the consulting results with the highest amount of value, with strict quality control and approvals from the Board of Directors. Individuals are obligated to speak up if any provided result might affect or not complying with the committed targets.

Working independency

To uphold our proposition of an objective consultant, we commit to eliminate any act that could interfere the objectivity of the consulting results. The committed actions including members of the firm taking up positions outside, in charge or relate to the Board of Directors of the clients. Meanwhile, members of the firm or their relatives are not allowed to publicly trade the shares of the clients before the start of the consulting project. These conditions are to eliminate any conflict of interest between the consulting firm and the clients.

Client Information confidentiality

As the peculiarity of the work, we are exposed to and manage various confidential document, information from the clients, including business strategy, operating direction as well as data and information on the status of the business. The document could be in the form of text, video or verbal. We understand that these are the enterprise confidential properties, and we bear the responsibility to keep the secret of those information. Thus, each member is committed to restrict the sharing of this information within the project and to those responsible for consulting the clients. At the same time, in the case of external communication, no employee is allowed to use information that could potentially reveal the identity of the clients as well as the collaboration between both parties. Members of the company are also not allowed to use client's information for any other purposes such as personal, political, or serving other clients.

On the other hand, data collected throughout the working process is secured and safe from unauthorized access by complying to the highest standards of cybersecurity implemented by FPT.

Companion

Being the leading technology company in Vietnam and the region, FPT Digital commit to accompany the client through the digital transformation journey towards achieving the highest level of consulting result that FPT Digital could bring. Companion could be deemed that every member of the project ensures the close collaboration between departments, from Leaders to working level, to exploit the valuable knowledge and experience from the long-standing employees. Throughout that process, we deeply understand the clients as well as help every individual in the client's organization to better understand their company, their leaders' vision and believe in the future development of the company to be ready to open their minds for new changes.

02.

Accreting inspirational and professional human development working environment

We understand that human is the most important resource of any business, especially consulting firms, the requirements for professionalism and grey matter are even higher. Thus, we focus on the creation and accretion of working environment to inspire and professionally develop human resource.

Downright sharing and individual respect

At FPT Digital, we build an open environment that open to straight feedback on behaviors that could have a negative effect on individual or organizational culture. We see the culture of downright sharing as one of the important individual respect. Feedbacks are kept confidential and only shared or discussed regarding appropriate actions with relating members of the Board of Directors and shall be seen as priority.

Regarding members with serious offences such as cheating, harassment, discrimination, exploitation, or law violation, members of the organization are obliged to immediately report to the legal department. At FPT Digital, we show no tolerance towards any form of revenge on individuals who spoke up. Revenge is understood to be any form of unequal treatment or work pressurizing. These acts shall face the highest level of discipline, the termination of labor contract or any legal responsibility if prescribed by law.

Recognition and effectiveness evaluation

We promptly and deservedly recognize individual contributions with moral incentives as well as rewards and recognition at each management level or at company-wide level. In addition, we have annual evaluations, in the spirit of openness, frankness, and confidentiality. Thereby, individuals are encouraged to express their aspirations which are seriously recognized and addressed by the Board of Directors.

Training and developing people

Professional competence and professional working style are the images representing a great consulting firm. Therefore, we always focus on nurturing skills and qualifications for the consulting team. Individuals are responsible for participating in accredited courses, or for organizing the sharing of materials in form of periodic teams.

In addition, developing and fostering of the successor team are also included in our annual plans. Each individual who feels he or she is worthy of the selected position can completely self-nominate with proof of competence. The selected individual is responsible for the sense of professional development through the guidance of their predecessors or external experts, to ensure their capabilities and mindset to lead the team in the future.

Engaging & Maintaining Teams

We build a working environment in which individuals feel respected, safe, and thrive in the long term. We consider inclusion and respect for diversity of personalities as the key to help individuals promote creativity and teamwork, thereby indirectly improving work quality and team spirit. We believe that a professional, open working environment and harmonious colleagues are important factors that bring a sense of pride of being a core cell of the organization and enhance the desire to contribute and stick to the organization.

03.

Accompanying and collaborating on resource sharing and development opportunity with partners

Expanding cooperation network

We understand that each unit has its own resources, strengths, and development opportunities. Sharing resources and development opportunities in forms of cooperation and support helps overcome weaknesses, leverage strengths and diversify the customer base for us and our partners.

Share principles of ethics and conduct

To ensure clarity and frankness in long-term cooperation, we expect our partners to understand and behave in accordance with the Code of ethic and behavior that FPT Digital has determined, including listed terms such as responsibility to the community, protection of property, respect for human rights, anti-bribery and corruption, etc. Besides, we are also committed to respect the code of ethics and conduct that our partners have issued and adhered to.



Documenting strategic cooperation

In addition, we ensure the drafting/agreement of all terms and conditions of cooperation in writing, and the signing of mutual agreement between the relevant parties before starting the cooperation journey. This is the basis for the protection of legitimate rights and interests of individuals and organizations, which members can refer to in case of disputes.

04.

Serious on performing social responsibility



As an enterprise, we are committed to bringing positive social impacts to the communities in which we live and work.

Social Responsibility

Firm members are always encouraged to participate in community activities through volunteer activities or contribution to community and charity campaigns. However, we have a regulation that members are not allowed to run for political office or to sponsor political activities such as sponsoring property, resources, or other interference in political activities.

Human rights

We are committed to protecting human rights and complying with human rights regulations. All acts of exploitation, use of child labor or workers under the minimum working age are strictly prohibited in any form. FPT Digital is also committed to not allowing discriminatory activities by race, color, gender, nationality, religion, age, disability, politics, etc. In addition, working equipment for members is guaranteed healthy and safe for users.

Environmental matters

In terms of environmental protection, we understand that minimizing the impact on the environment is essential to ensure the sustainability of the company as well as the health of the communities where we live and work. As such, we are committed to complying with all applicable environmental laws and regulations.

05.

Asset protection, law compliance and anti-corruption

Asset protection

The Company's assets include tangible assets such as money, machinery, and equipment, working vehicles, etc., and intangible assets including intellectual properties, confidential information, data, trademarks, network systems, and software, etc. Asset protection is an important activity that helps organizations proactively respond to possible risks, to preserve resources and continue to grow.

Protection of tangible assets: Firm members need to use assets for the intended purpose for which they are allocated, to explain use cases for other purposes, and to have an obligation to protect the safety and current state of assets.

Protection of intangible assets: Members and related partners are obligated to comply with requirements for protection of intellectual property rights including but not limited to intellectual properties, company trademarks, internal information security and client-related documents.

Protection of data: Stored data includes personal data of members, internal data of the organization and customer data. Members and related partners are obliged to comply with the requirements for protection, transfer, provision and storage of data. At the same time, data is protected from external unauthorized access by complying with the highest cybersecurity standards. All acts of using data need the consent of an authorized person.

Law compliances

As an open, transparent enterprise, we are committed to complying with all laws, whether local, national, or regional ones. It is the responsibility of FPT Digital members and those acting on our behalf to understand the applicable regulations and to work with the Legal Department to ensure compliance.

Anti-Bribery & Corruption policy

FPT Digital complies with the legal frameworks of anti-bribery, and anti-corruption in Vietnam where we operate. FPT Digital's members, and anyone acting on behalf of FPT Digital, will not participate in any form of bribery & corruption.

Corruption is a form of dishonesty or criminal offense undertaken by a person or organization entrusted with a position of authority, to acquire illicit benefit or abuse power for one's private gain.

Bribery means giving or providing the Authority with "bribes" to affect the decisions, including payments for the authority to gain advantage for FPT Digital or maintain business relation, or affecting audit, inspection, taxation or related documents.

Bribes are "anything of value" intended to secure an improper advantage or otherwise inappropriately influence the recipient. This means anything that is valued by the person that someone is attempting to influence—whether or not it has any commercial value, for example: cash, gifts, meals, receptions, business opportunities, FPT Digital-branded items, employment chances, and other relevance. It does not matter whether the thing of value is funded by FPT Digital, a third party or from the employee's own personal resources. Merely offering something of value can violate the law, whether or not it is actually accepted or a benefit is received.

Providing or giving "anything of value" to the Authority requires written approval of the Legal Department, and such payment must be recognized by FPT Digital's official account.

In order to ensure compliance to foreign/external affairs principles of FPT Digital in terms of relation with the Authority, you can consult the Legal department or the personnel who is responsible for public affairs of FPT Digital.

Summary

The Code of Professional Conduct and Ethics is an affirmation of our aspiration to become a professional organization; providing the best value to our customers as well as creating a dream working environment for our members, and raising awareness of bringing a positive impact to the community and enhancing the position of the company.

This is also a resource to help each individual in the company refer and behave to create a unified organization in which each individual can completely represent the spirit of the whole organization. We believe that strict adherence to this Code of Professional Conduct and Ethics is the key to make FPT Digital an irreplaceable choice for customers on the path of Digital Transformation.