

 DIGIWORLD	REGULATION OF ANTI - CORRUPTION AND BRIBERY	Code: 01-ITN/DGW Effective Date: 01/10/2020
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APPROVAL				
Execute Person	Curator	Title	Signature	Date
Drafting	Pham Thi Quyet	HN HR Supervisor		30.09.2020
Controller	Huynh Ngoc Lien	Head of Human Resources		30.09.2020
Approver	To Hong Trang	Deputy General Director		30.09.2020

TRACKING TABLE OF AMENDED CONTENT

Amended content in details				
Version	Effective Date	Expiration Date	Description of changes	Person in Charge
V 1.0	17/06/2017	30/9/2020	First issuance	Trieu Ngoc Minh
V 2.0	01/10/2020		Amend content to Article 3; Article 5	Pham Thi Quyet

ARTICLE 1. PURPOSE

Regulations on anti-corruption and bribery are established to ensure:

- All business activities of Digiworld Corp. are conducted in an honest, transparent and professional manner in all business activities.
- Prevention of the corruption and bribery that harms Digiworld's reputation of financial integrity and impair the relationship between the Company and its customers, business partners and competitors.
- All employees in the Company are aware of situations/behaviors that could be considered as corruption and bribery which can affect the Company when the employee representing the Company accepts gifts, giving gifts and regaling guests.

ARTICLE 2. SCOPE OF APPLICATION

This regulation is applicable to all Digiworld's and its Subsidiaries' employees at all levels .

ARTICLE 3. INTERPRETATIONS OF DEFINITIONS

1. Company: Digiworld Corp.
2. Employees: staffs, employee of the Company.

ARTICLE 4. DIRECTIONS TO DETERMINATE THE ACTS OF CORRUPTION AND BRIBERY

1. **Bribery:** An act of directly/indirectly **offering/promising/giving** or **demanding/agreeing to receive/receiving** any gift or regalement for the purpose of influencing a certain decision of the recipient in order to gain financial benefits or other advantages and benefits affecting Digiworld's business operations.
 - **The following cases shall not be deemed bribery:**
 - ✚ In case of **receiving gifts:**
 - Digiworld's employees are given unique souvenir gifts on the occasion of festivals or special events; giving tribute to customers, lucky money (with negligible value) on the occasion of Tet, regalement, receiving gifts in a normal and proper maner, specifically:
 - ✓ Value of each gift or 01 (one) regalement/01 person must not exceed VND 5,000,000
 - ✓ The regalement and giving gifts must not be intended to influence a certain decision of the recipient in order to gain financial benefits or other advantages, benefits.
 - Digiworld's employees are provided with tools and resources to help solve their work more efficiently and quickly - with the sole purpose of being effective in work.
 - Digiworld's staff collects third-party fees (with full legal invoices and documents) with a view to provide additional convenient services which helps solve tasks more efficiently and quickly.
 - ✚ In case of giving, presenting or offering:
 - Digiworld's employees have to pay additional fees (with full invoices and documents and must be approved by athorized manager) to work faster and more efficiently.
 - Digiworld's employees offer gifts according to Digiworld's **Regulations on Giving, Presenting, and Offering Gifts** but must ensure that the purpose of offering gifts in accordance with this Regulation will not illegally affect any receivers' decision so as to gain financial interests or other advantages, benefits.
2. **Corruption:** acts intended to serve personal interests of money, property or other interests, specifically as follows:
 - Embezzlement.
 - Bribery.
 - Abuse the power to appropriate Company property.
 - Taking advantage of positions and powers while performing duties.
 - Abuse authority while on duty.
 - Taking advantage of positions and powers to influence others for self-seeking.
 - Forging in work
 - Bribery, bribery broker done by a person with positions and powers to handle work.
 - Taking advantage of positions and powers to illegally employ assets of the Company.
3. **Digiworld related parties:** can be a person or an organization, specifically as follows:
 - Banks, Brands Manufacturers, Services and Goods Providers for Digiworld.
 - Agents, customers or units selling products, goods and services of Digiworld or on behalf of Digiworld.



- Digiworld recruitment candidates.
- Investors, partners of Digiworld (including employees, and individuals who are authorized/appointed representatives for these partners) during merger and joint venture negotiation, association...
- Employees, consultant partners, outsourced service organizations and branches of Digiworld.
- Local state management agencies whose decisions may affect Digiworld's business operations. For example: Agencies in charge of settling, responding to, and approving legal and tax matters for Digiworld such as Tax offices, the Ministry of Finance...

4. Work positions with bribery risk:

Some positions have a high bribery risk. Here are some situations where a Digiworld employee may face a higher risk of bribery:

- Digiworld's employees who have the right to approve contracts for goods and service providers.
- Digiworld's employees who hold the position of inspector, controller and supervisor in the operational processes and daily tasks of Digiworld.
- Digiworld's employees who have the opportunity to have direct contact with customers.
- Digiworld's staff who participate in the merger and acquisition process
- Digiworld's employees who are involved in the process of establishing joint venture organizations, business association.
- Digiworld's employees who can access sensitive information about stock prices.
- Digiworld employees who have the opportunity to access funds.
- Digiworld's employees who participate in the process of working and negotiating with State officials or State agencies.

ARTICLE 5. BASIC REGULATIONS:

1. Digiworld strictly prohibits any act of corruption, giving or accepting bribes for any purpose, in money according to **Article 4 of this Regulation**, or in any other forms with **Related parties of Digiworld**.
 - Digiworld employees are not allowed to appropriate cash/cash redeemable items such as gift certificates, or overly luxurious regalement parties with a value of over VND 5,000,000 from **Digiworld's related parties** for personal enjoyment.
 - Digiworld's employees are not allowed to receive goods and services provided that are not in accordance with normal commercial principles from **Digiworld's related parties** (Example: The contractor agrees to repair and upgrade the apartment of the Digiworld's employees with preferential prices or offers employees on overseas trips in exchange the Contractor will win the bid to receive a great deal contract from Digiworld).
 - Digiworld employees are not allowed to receive trips/training/events not for the purpose of business from **Digiworld related parties**.
 - Digiworld employees are not allowed to give bribes to any individual or company that is **related parties of Digiworld** for the purpose of obtaining or maintaining a business transaction.

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- Digiworld employees are not allowed to give benefits and bribes related to contracts, bidding packages and public auctions with a view to influence **Digiworld's related parties**.
2. In case of Digiworld's employees received from **Digiworld's Related parties** gifts which are goods, services, invitations to trips/training/media events, cash/items convertible into money such as a gift voucher valued at over VND 5,000,000 the employee **must report** to the direct supervising manager and the Head of Administration Department; Head of Human Resources Department, at the same time, must return all gifts received to Digiworld for distribution according to regulations.
 3. In case of Digiworld employees received regalement with luxurious parties valued at over VND 5,000,000 while performing work of extremely sensitive nature **with the risk of bribery**, employees must report to the Head of Administration and prove to their direct supervising manager that such luxury parties do not influence a certain decision of the recipient in the course of work to get approval from superior level manager.

ARTICLE 6. REGULATIONS ON LEGAL BARRIERS:

1. The Legal Department and the other departments must ensure that all economic contracts, agreements with "**Digiworld's related parties**" contain an "anti-bribery and corruption" provision.
2. In the case that "**Digiworld's related parties**" are employees of Digiworld, in addition to the separate Anti-Bribery and Corruption clause, the contract must include a requirement to comply with all Digiworld's Policies and Regulations, including the Anti-corruption and Bribery Regulations; failure to comply may result in appropriate disciplinary action. Furthermore, the recruitment department must ensure that the recruitment and inspection process must comply with the Anti-Corruption and Bribery Regulations.
3. The user division must review and make a list of economic contracts without the Anti-Corruption and Bribery Clause. Such checking, reviewing and listing must be done every quarter.
4. Quarterly, the Legal Department must collect a list of contracts that do not have anti-corruption or bribery provisions from other departments to conduct a risk assessment of bribery corruption that may occur in practice when executing these contracts and report to the Board of Directors to seek for advice on the level of risk and remedy directions.
5. The user department must update quarterly the list of payments and payouts for contracts that do not have a bribery risk clause.

ARTICLE 7. CONTROLS PREVENTION OF CORRUPTION AND CORRUPTION:

1. The Administration Department will randomly check the gift/regalement based on the following rules:
 - Check the nature of gifts/regalement to ensure compliance with the anti-corruption regulations of Digiworld.
 - Checking the approval of gifts/regalement that the employee received.
 - Check recipients: determine the recipient's job position and nature at the time of receiving the gift to ensure there is no risk of corruption or bribery.
2. Responsibilities of each Digiworld's employee: All Digiworld employees are required to complete:
 - An integration session is for new employees within the first 2 months, and must complete a Declaration in accordance with the Anti-Corruption, Bribery Policy within the first 2 working weeks.

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- In case of newly recruited/transferred employees to positions, sections with a high risk of corruption or bribery, the Head of the Division must provide additional training in anti-Bribery and corruption for them.
- Complete the annual training programs organized by the Company to ensure a thorough understanding of policies and requirements.

ARTICLE 8. PENALTIES FOR VIOLATIONS:

- Employees who directly engage in corrupt acts and collusion /cover/solicit person, if found with sufficient clear evidence, will be fired immediately and blacklisted in the Digiworld's staff members documents and will not be recruited back to Digiworld or transferred to other positions.
- Employees that indirectly facilitate or fail to fulfill their responsibilities such as loosening management, loosely controlling or knowing but ignoring to report so that corruption have a chance to take place will be disciplined according to Disciplinary actions as specified in Digiworld's Labor Rules.

ARTICLE 9. CLAUSE OF EFFECT

This regulation shall be effective from the date of signing for approval of issuance.

