



**REGULATIONS ON DISCLOSURE
INFORMATION**

THANHCONG SECURITIES COMPANY

Ho Chi Minh City, August 2nd, 2023

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CHAPTER I. GENERAL PROVISIONS

Article 1. Scope of application and applicable subjects

1.1 Scope of application:

This Regulation governs the implementation on disclosure information of ThanhCong Securities Company on the Vietnam stock market. It also stipulates the coordination between affiliated units, departments, individuals in the Company, and other subjects in performing the disclose information obligations.

1.2 Applicable subjects:

- a) The Person(s) in Charge of Disclosure Information, Authorized Person(s) in Charge of Disclosure Information.
- b) Relevant departments including the Financial Department, the Company Secretary, the Person in Charge of Corporate Governance, and other relevant departments/personnel.
- c) Insiders, related persons of insiders, majority shareholders, groups of related persons holding at least 5% of the total voting shares of ThanhCong Securities Company.

Article 2. Legal basis

- Law on Enterprises No. 59/2020/QH14 dated 17th June, 2020;
- Law on Securities No. 54/2019/QH14 dated 26th November, 2019;
- Decree No. 155/2020/NĐ-CP dated 31st December, 2020 detailing the implementation of a number of articles of the Law on Securities;
- Circular No. 96/2020/TT-BTC dated 16th November, 2020 guiding the disclosure of information on the securities market;
- Circular 121/2020/TT-BTC dated 31st December, 2020 regulating the operation of securities companies;
- Regulation on Disclosure Information at the Vietnam Stock Exchange and its subsidiaries promulgated with Decision No. 21/QĐ-SGDVN dated 21st December, 2021 of the General Director of the Vietnam Stock Exchange;
- Charter and Internal Regulations on Corporate Governance of ThanhCong Securities Company;
- Other relevant legal documents.

Article 3. Abbreviations

- Company : ThanhCong Securities Company
- SSC : Vietnam State Securities Commission
- SCMS : Securities Companies Management system of SSC

- VNX : Vietnam Stock Exchange
- HNX : Hanoi Stock Exchange
- CIMS : Company information management system of HNX
- HOSE : Ho Chi Minh City Stock Exchange
- VSDC : Vietnam Securities Depository and Clearing Corporation
- VSM : Vietnam Stock Market
- DI : Disclosure Information
- BODs : Board of Directors
- IC : Inspection Committee
- CEO : Chief Executive Officer/General Director
- CFO : Chief Financial Officer
- FS : Financial Statements
- MS : Majority Shareholders
- TS : Treasury Stocks
- GMS : General Meeting of Shareholders
- ERC : Enterprise Registration Certificate
- PC : Public Company
- RP : Related Person(s)
- LSPC : Large-scale Public Company
- LPC : Listed Public Company

Article 4. Definition of terms

4.1 The Company's insiders include:

- Chairman and Members of the Board of Directors, Legal Representatives, General Director, Vice General Director, Chief Financial Officer and equivalent managerial titles appointed by the General Meeting of Shareholders or Board of Directors;
- Head and Members of Inspector Committee (Controllers), Members of the Board of Internal Audit;
- Company Secretary, Person in Charge of Corporate Governance, Person(s) and Authorized Person(s) in Charge of Disclosure Information.

4.2 Disclosure date prefers to the date that the information appears on one of the means of disclosure information specified in Article 6 of this Regulation.

- 4.3** Reporting date prefers to the date of sending fax, email, or the date when information is received on the disclosure information system of SSC, means of disclosure information of VSE, HNX, HOSE or the date when SSC, VSE, HNX, HOSE receive a written report, depending on whichever arrives first.
- 4.4** For documents in written form: A valid document is an original or valid copy. A valid document shall meet the following requirements:
- Documents of individuals: Documents with the full name and signature of individuals.
 - Documents of organizations: Documents certified by competent persons, including: full name, position, signature of competent persons, seals (if any).
- 4.5** The scanned version for disclosure shall include all the contents as prescribed for a valid document.
- 4.6** Electronic data for disclosure that is in word/excel/pdf format (word/excel uses Unicode code).
- The Person(s) in Charge of Disclosure Information are the Company's Legal Representatives or Authorized Person(s) in Charge of Disclosure Information. The Company's Legal Representative shall be responsible for the accuracy, timeliness and completeness of the information disclosed by Authorized Person(s) in Charge of Disclosure Information.
- 4.7** Related persons are organizations, individuals as prescribed in Clause 46, Article 4 of the Law on Securities.
- 4.8** An approved audit organization is an independent audit organization on the list of audit organizations approved by SSC in accordance with the provisions of the Law on Securities and the law on an independent audit.

Article 5. Principles of disclosure information

- 5.1** The disclosure information shall be complete, accurate and timely following the law.
- 5.2** The applicable subjects as prescribed in Clause 2, Article 1 of this Regulation shall be responsible for the contents of disclosed information. In case there is any change in the published information content, the Person(s) in Charge of Disclosure Information shall announce the changed content and the reason for the change compared to the previously announced information.
- 5.3** When disclosing information, the applicable subjects as prescribed in Clause 2, Article 1 shall simultaneously report to SSC and the Stock Exchange(s) on the content of the disclosed information, including all information as prescribed.
- 5.4** The disclosure of personal information includes: Citizen ID/Identity Card/Valid passport, contact address, permanent address, phone number, fax number, email, securities trading account number, securities custody account number, bank account number, trading codes of foreign investors and any foreign-invested economic organization holding over 50% of charter capital, shall be only executed if the relevant subject agrees.

5.5 In case the disclosed information includes personal information specified in Clause 4, Article 5 of this Regulation and Person(s) in Charge of Disclosure Information does not agree to publicize such information, they shall send 02 copies of documents to SSC and the Stock Exchange(s), in which 01 report on disclosure information includes full personal information and 01 report does not include personal information for SSC and the Stock Exchange(s) to publicize information.

Article 6. Means of disclosure information

STT	Applicable subjects	Means of disclosure information
1	Company	Column on News/Shareholder Relations on the Company's website. (*)
2	State Securities Commission	Disclosure Information System of the State Securities Commission – SCMS.
3	Vietnam Stock Exchange	Disclosure Information system of Vietnam Stock Exchange – CIMS.
4	Hanoi Stock Exchange	Disclosure Information system of Hanoi Stock Exchange – CIMS.
5	Other mass media as prescribed	Website of VSDC.
6	by law in some cases	Print newspapers, electronic newspapers, etc.

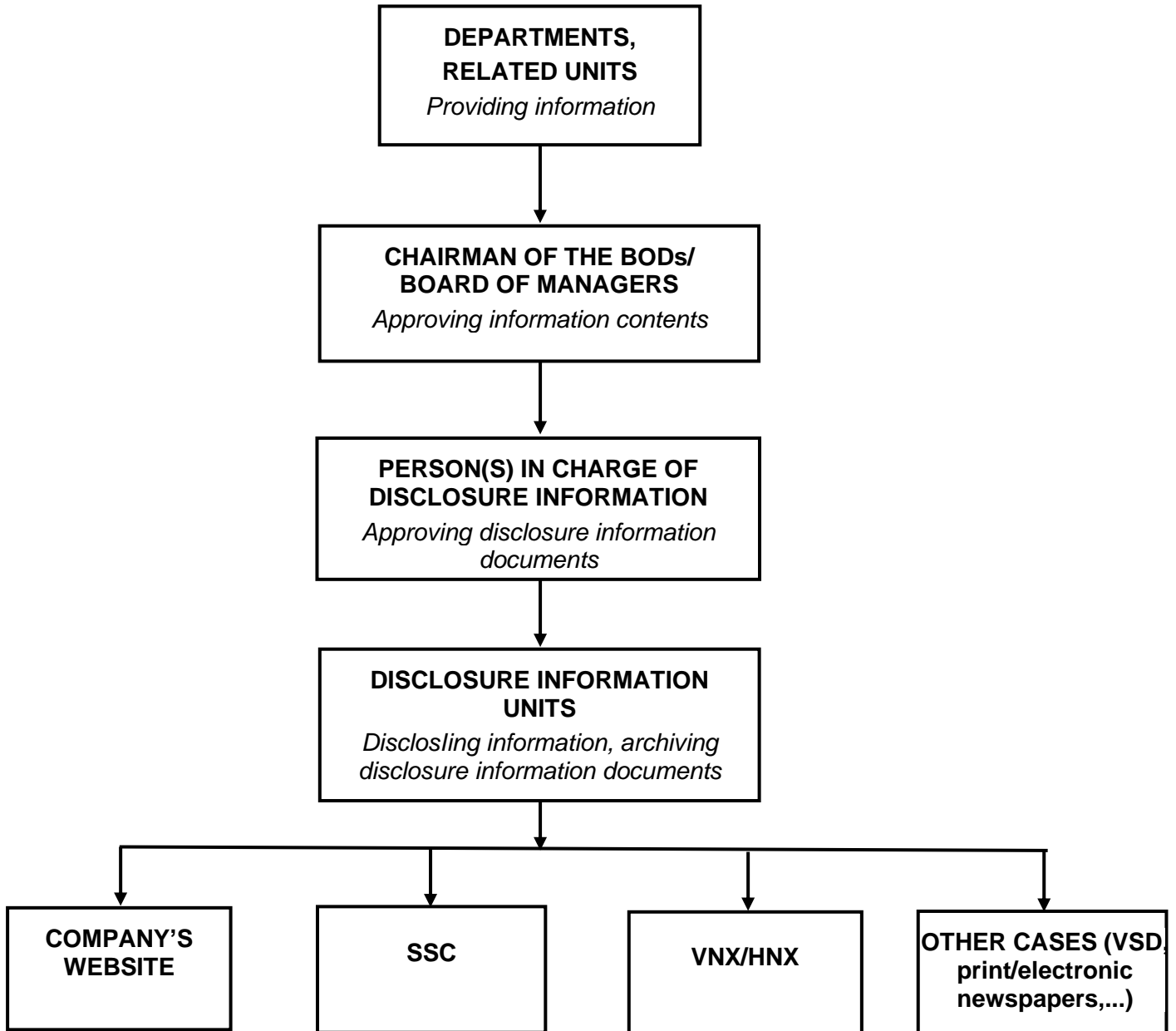
(*)Note:

- *In case disclosure information obligations arise on off-days, holidays, the Company shall still disclose information on the Company's website and the Disclosure Information systems of SSC and Stock Exchange(s) on such these days in accordance with the law and fully fulfill disclosure information obligations on the first working day after the off-days or holidays in accordance with the law.*
- *When setting up a website, the Company shall send a report to SSC, the Stock Exchange(s), publicize the address of the website and any changes related to this address within 03 working days from the date of completion of the establishment of the website or when changing the address of this website.*
- *The website shall display the time of posting information, and simultaneously ensure that investors can search and access the data on that website.*
- *Periodic disclosure information, information regarding public company registration shall be kept in documents (if any) and electronic data for at least 10 years. This information shall be archived and accessible on the Company's website for at least 05 years.*
- *Extraordinary disclosure information, disclosure information based on requested or other activities shall be stored and accessible on the Company's website for at least 05 years.*

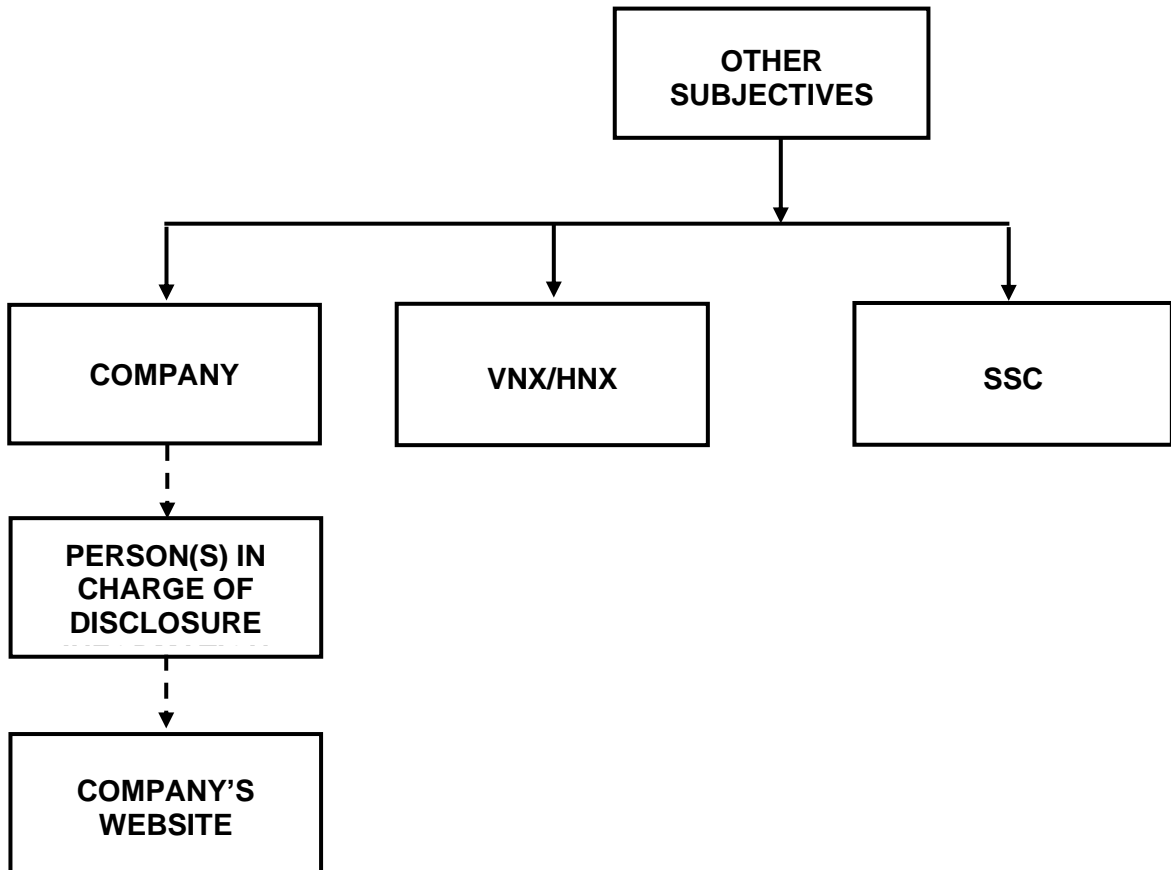
CHAPTER II: DISCLOSURE INFORMATION CONTENTS



Article 7. Implementation flowchart

7.1 Applying for relevant departments as prescribed at Points a and b, Clause 2, Article 1 of this Regulation



7.2 Applying for other subjects (**)



Notes:  : Send directly to the Company, SSC and Stock Exchange(s)
 : Person(s) in Charge of Disclosure Information/Authorized Person(s) in Charge of Disclosure Information receives information from other subjects to review and publish on the Company's Website.

(**) *Other subjects are the applicable subjects specified at Point c, Clause 2, Article 1 of this Regulation, including Insiders, related persons of insiders, majority shareholders, groups of related persons holding at least 5% of total voting shares of the Company*

Article 8. Disclosure information contents

- 8.1 Relevant departments as prescribed at Points a and b, Clause 2, Article 1 of this Regulation shall disclose information in accordance with the provisions of Appendix 1 of this Regulation.
- 8.2 Other subjects shall disclose information in accordance with the provisions of Appendix 2 of this Regulation.
- 8.3 Also, other disclosure information not specified in this Regulation (if any) shall be implemented in accordance with current laws.

CHAPTER III. RESPONSIBILITY FOR IMPLEMENTATION AND HANDLING VIOLATIONS

Article 9. Responsibilities for coordination between Person(s) in Charge of Disclosure Information and relevant departments

- 9.1** The Person(s) in Charge of Disclosure Information shall be responsible for the implementation of the Company's disclosure information obligations to SSC, Stock Exchange(s), investors and other relevant persons in accordance with the provisions of law and the Company's Charter.
- 9.2** Person(s) in Charge of Disclosure Information within the scope of their functions shall receive and process the information provided by functional departments according to the contents of this Regulation. Heads of functional departments shall be responsible for the accuracy and timeliness of the information provided to the Person(s) in Charge of Disclosure Information.
- 9.3** In case of extraordinary information and the information provided upon requests that must be disclosed according to regulations, the relevant departments (where the information that needs to be provided arises) shall be responsible for providing information to the Person(s) in Charge of Disclosure Information within **04 hours** from the occurrence of the disclosure information event.
- 9.4** The Person(s) in Charge of Disclosure Information shall supervise the implementation of disclosure information and report such results to the Board of Directors.

Article 10. Handling violations of disclosure information

- 10.1** The applicable subjects specified in Clause 2, Article 1 of this Regulation that violate the provisions of this Regulation or the provisions of law shall be subject to penalties depending on the nature and seriousness of their violations in accordance with the regulations.
- 10.2** The handling of violations on disclosure information is carried out in accordance with Decree No. 156/2020/NĐ-CP dated 31st December, 2020 stipulating the penalties for administrative violations in the field of securities and securities market and other relevant legal documents.
- 10.3** The Board of Directors and the General Director have the right to propose the appropriate penalties for violations of this Regulation in accordance with their functions and powers.

Article 11. Competence to handle violations

- 11.1** Violations arising from applicable subjects: The handling of violations shall be carried out in accordance with the law and the competence of the Board of Directors.
- 11.2** Violations arising from individuals of the departments: The violations shall be carried out in accordance with the law and the competence of the General Director.

Article 12. Implementation

12.1. Based on the contents of the Regulation, relevant objectives are responsible for implementation.

12.2 In case there are provisions of law related to disclosure obligations that have not been mentioned in this Regulation or there are new provisions of law that are different from the provisions of the Regulation, those legal provisions shall naturally apply and adjust disclosure information obligations of the object with these relevant obligations.

12.3 The amendment and supplementation of this Regulation shall be decided by the Chairman of the Board of Directors after being approved by the Board of Directors.

Recipient:

- BOM;
- IC;
- Relevant departments;
- Archived: Company.

**ON BEHALF OF BOARD OF DIRECTORS
CHAIRMAN**

NGUYEN KHANH LINH

APPENDIX 1: GUIDANCE ON DISCLOSURE INFORMATION FOR RELEVANT DEPARTMENTS

NO.	CONTENTS	DEADLINE FOR DISCLOSURE	DEADLINE FOR PROVIDING INFORMATION	NOTES
1. PERIODIC DISCLOSURE INFORMATION				
Financial Statements				
1	Quarterly Financial Statements	Separate statements: Within 20 days from the end of the quarter. Consolidated statements: Within 30 days from the end of the quarter.	At least 3 days prior to the disclosure time	
2	Reviewed quarterly financial statements (if any)	Within 05 days from the date the audit organization signs	At least 3 days prior to the disclosure time	
3	Reviewed semi-annual financial statements	Separate statements: Within 05 days from the date the audit organization signs but not exceeding 45 days from the end of the first 6 months of the fiscal year. Consolidated statements: Within 05 days from the date the audit organization signs but not exceeding 60 days from the end of the first 6 months of the fiscal year.	At least 3 days prior to the disclosure time	
4	Audited Financial Statements	Within 10 days from the date the audit organization signs but not exceeding 90 days from the end of the fiscal year.	At least 3 days prior to the disclosure time	
5	Disclosure information in other special cases: After changing the accounting period, the Company announces the financial statements for the period between 02 accounting periods of the old fiscal year and the new fiscal year in accordance with the law on corporate accounting.	Within 10 days from the date the audit organization signs the audit report but not exceeding 90 days from the start date of the new fiscal year.	At least 3 days prior to the disclosure time	

6	<p>When disclosing FS; an explanation of the reasons is required in the event of any of the following cases:</p> <ul style="list-style-type: none"> - The after-corporate income tax profit in the statement of business results of the reporting period changes by 10% or more compared to the report of the same period of the previous year; - The after-tax profit in the reporting period shows a loss; or it shifts from a profit in the same period of the previous year to a loss in the current period, or vice versa; - The after-tax profit in the reporting period has a difference of 5% or more before and after the audit or review, or shifts from a loss to a profit, or vice versa; -In cases where the audit organization issues an audit opinion or reviews conclusion that is not a fully accepted audit opinion or reviews conclusion for FS, or FS has retrospective adjustments, it is required an ID about the audit opinion, review conclusion, the results of the retrospective adjustments to the FS. 	Disclosure information simultaneously explained statements with financial	Same deadline as financial statements	
Financial Safety Ratio Report				
1	The reviewed financial safety ratio report on 30 th June.	At the same time when the ID of the semi-annual FS has been reviewed	At least 3 days prior to the disclosure time	
2	The audited financial safety ratio report on 31 st December.	At the same time when the ID of the annual FS has been audited	At least 3 days prior to the disclosure time	
Annual report				

1	Annual report	Within 20 days from the date of publication of the audited annual financial statement, but not exceeding 110 days from the end of the fiscal year.	At least 2 days prior to the disclosure time	
Report on Corporate Governance				
1	Report on the Company's governance in the first 6 months of the year.	Within 30 days from the end of the first 6 months of the calendar year	At least 3 days prior to the disclosure time	
2	Annual Corporate Governance Report	Within 30 days from the end of the calendar year.	At least 3 days prior to the disclosure time	
General Meeting of Shareholders/Collecting written opinions				
1	Disclosure information on the compilation of the list of shareholders entitled to attend the General Meeting of Shareholders.	Minimum 20 days prior to the last registration date	Within 4 hours from the occurrence of the event	
2	Invitations and documents of General Meeting of Shareholders.	At least 21 days prior to the opening date of the General Meeting of Shareholders	At least 2 days prior to the disclosure time	
3	Voting ballots, drafted Resolution(s) of the General Meeting of Shareholders and documents explaining the draft Resolution(s).	At least 10 days prior to the deadline for returning the voting ballots (If the Charter do not stipulate another longer time limit)	At least 2 days prior to the disclosure time	
4	Minutes and Resolution of GMS.	Within 24 hours from the approval of the Resolution and Minutes of the General Meeting of Shareholders	Within 04 hours from the approval of the Resolution and Minutes of the GMS	
5	Minutes of voting results and Resolution of the GMS.	Within 24 hours from the date of approval of the Resolution and the record of vote counting for shareholders' opinions	Within 04 hours from the approval of the Resolution and the Record of consulting opinions	
Disclosure information on offer, issuance, listing, trading registration and report on the use of capital				

1	The Company performing private securities offerings, public offering of securities, issuance of securities, listing, registration of transactions fulfills disclosure obligations on offering, issuance, listing, transaction registration and reporting on the use of capital.	Comply with the law on securities offering, issuance, listing and registration for securities trading	At least 2 days prior to the disclosure time	
Disclosure information on foreign ownership ratio				
1	Disclosure information on foreign ownership ratio limits and changes related to such ratios.	Comply with the provisions of the securities law guiding foreign investment activities in the Vietnamese	At least 2 days prior to the disclosure time	
2. EXTRAORDINARY DISCLOSURE INFORMATION				
1	The Company's account at banks or branches of foreign banks has been blocked upon the request(s) of the competent authorities or when the organizations providing payment services detect signs of fraud or illegal activities relevant to the payment account; the accounts shall be allowed to operate again after being blocked in the cases specified at this point.	Within 24 hours	Within 4 hours from the occurrence of the event	
2	Upon receipt of the documents of the competent state authorities or upon receipt of the decisions on the suspension of part or all of the Company's business activities; changes in enterprise registration contents; revocation the business registration certificate; amendment, supplementation or suspension or revocation of the establishment and operation license.	Within 24 hours	Within 4 hours from the occurrence of the event	

3	Approval of the decisions of the extraordinary general meeting of shareholders. The disclosed documents shall include: Resolutions of the general meeting of shareholders, minutes and documents attached to the minutes, resolutions or vote-counting records (in case of collecting shareholders' written opinions). In case the general meeting of shareholders approves the delisting, the Company shall disclose the delisting together with the approval rate of shareholders who are not majority shareholders.	Within 24 hours	Within 4 hours from the occurrence of the event	
4	Decisions to repurchase shares of the Company or sell treasury shares; the date of exercise of the right to purchase shares of the bondholders enclosed with the right to purchase shares or the date of conversion of bonds converted into shares; decisions on the foreign offering of securities and decisions related to the offering and issuance of securities.	Within 24 hours	Within 4 hours from the occurrence of the event	
5	Decisions on dividend ratio, method and time of dividend payment; decide on the separation and consolidation of shares.	Within 24 hours	Within 4 hours the event occurring	
6	Decisions on the reorganization of enterprises (division, separation, consolidation, merger, transformation of enterprise types), dissolution and bankruptcy; change of tax code, Company's name or seal; relocation; establishing or closing head office, branches, factories and representative offices; promulgating, amending and supplementing the Charter; strategy, medium-term development plan and annual business plan of the Company.	Within 24 hours	Within 4 hours from the occurrence of the event	

7	Decisions on change of accounting period and applicable accounting policy (except for the case of change in applicable accounting policy due to change in legal provisions); notification about signing the contract for auditing annual financial statements or changing auditing organization (after having signed the contract); cancellation of the signed audit contract.	Within 24 hours	Within 4 hours from the occurrence of the event	
8	Decisions on capital contribution to establish or purchase to increase ownership in a company, leading to that company becoming a subsidiary or associated company, or sell to decrease the ownership in a subsidiary or associated company, leading to that company no longer being the Company's subsidiary or associated company, or dissolve the subsidiary or associated company.	Within 24 hours	Within 4 hours from the occurrence of the event	
9	Decisions of the General Meeting of Shareholders or of the BODs on approval of contracts and transactions between the Company and the Company's insiders or related persons.	Within 24 hours	Within 4 hours from the occurrence of the event	

10	<p>When there is a change in the number of voting shares, the DI deadlines are as follows:</p> <ul style="list-style-type: none"> - In case the Company issues additional shares or converts bonds/preference shares into common shares, the disclosure shall be made from the time the Company reports to SSC about the issuance results or conversion results as required by the law on securities issuance. - In case the Company redeems its shares or sells treasury shares, the disclosure shall be made from the time the Company reports the transaction results as required by the law on redemption of shares and treasury share transaction. - In cases the Company repurchases shares from employees according to the company's employee stock issuance regulations or repurchases odd-lot shares upon the request of shareholders; or the company repurchases shares to correct transaction errors or repurchases odd-lot shares, the company shall disclose information within the first 10 days of the month based on completed transactions and update it up to the disclosure date. 	Within 24 hours	Within 4 hours from the occurrence of the event	
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11	The Company changes, appoints, re-appoints or dismisses insiders; receives a resignation letter from them (the Company shall specify the effectiveness as prescribed in the Law on Enterprises and the Company's Charter). At the same time, the Company shall send the new insider's information to SSC, Stock Exchange(s) in accordance with the form specified in Appendix III of Circular 96/2020/TT-BTC.	Within 24 hours	Within 4 hours from the occurrence of the event	
12	Decisions to purchase or sell assets or carry out transactions with a value higher than 15% of the Company's total assets, based on the latest annual audited FS or the latest reviewed semi-annual FS (based on the consolidated financial statements).	Within 24 hours	Within 4 hours from the occurrence of the event	
13	Upon receipt decisions to prosecute the Company or its insiders; or to detain or pursue criminal liability against insiders of the Company.	Within 24 hours	Within 4 hours from the occurrence of the event	
14	Upon receipt of the legally effective court judgments or decisions related to the company's activities, or decision on penalties for violations of tax law.	Within 24 hours	Within 4 hours from the occurrence of the event	
15	Upon receipt of the court's notice of acceptance of bankruptcy procedure.	Within 24 hours	Within 4 hours from the occurrence of the event	
16	In case the Company is aware of any event or information affecting its stock price, the Company shall confirm or correct such event or information.	Within 24 hours	Within 4 hours from the occurrence of the event	
17	Whenever any events occur that seriously affect the Company's business operations or the governance.	Within 24 hours	Within 4 hours from the occurrence of the event	
18	Being approved or delisted on foreign stock exchanges.	Within 24 hours	Within 4 hours from the occurrence of the event	

19	Decisions on increase or decrease of charter capital.	Within 24 hours	Within 4 hours from the occurrence of the event	
20	Decisions on investment capital in an organization, project, loan, lending or other transactions with the minimum value of 10% of the Company's total assets, as stated in the latest annual audited FS or the latest reviewed semi-annual FS (based on the consolidated FS).	Within 24 hours	Within 4 hours from the occurrence of the event	
21	Decisions on capital contribution with the minimum value of 50% of the total charter capital of an organization (calculated based on the charter capital of the organization receiving the contributed capital before the time of contribution).	Within 24 hours	Within 4 hours from the occurrence of the event	
22	Upon receiving the decisions of SSC regarding administrative violations in the field of securities and securities market for companies, branches and securities practitioners of companies and branches; General Directors (Directors) and Vice General Directors (Vice Directors) are temporarily deprived of the right to use the securities practice certificate, or the securities practice certificate is revoked	Within 24 hours	Within 4 hours from the occurrence of the event	
23	Upon receipt of decisions of prosecution, detention or accountability for criminal responsibility of securities practitioners of the Company, branches.	Within 24 hours	Within 4 hours from the occurrence of the event	
24	Upon receipt of SSC's decisions on placing the Company in or out the category of warning, control or special control; suspension of operation, temporary cessation of operations or termination of suspension/temporary, cessation of operations.	Within 24 hours	Within 4 hours from the occurrence of the event	

25	Upon receipt of SSC's decisions approving the establishment, closure or change of name, location of branches, transaction offices, representative offices in domestic or abroad; change lines of business at branches; establishment of overseas subsidiaries; indirect investment abroad.	Within 24 hours	Within 4 hours from the occurrence of the event	
26	Upon receipt of the decisions of SSC approving to provide the online securities trading services; to provide or coordinate with credit institutions in offering services for customers to borrow money to purchase securities or to offer securities lending services; to provide or coordinate with credit institutions in offering advance payment services for securities sales; securities depository; clearing and settlement of securities; and services in the derivatives market.	Within 24 hours	Within 4 hours from the occurrence of the event	
27	Upon receipt of SSC's decisions on the offering and listing of securities abroad.	Within 24 hours	Within 4 hours from the occurrence of the event	
28	Upon completing the transactions for transferring shares or capital contributions to become a shareholder or capital-contributing member holding at least 10% of the total of contributed charter capital of a securities company that is not a public company; transactions that alter the ownership of shares or capital contributions constituting at least 10% of total charter capital, or transactions that result in the ownership ratio of shareholders or capital-contributing members exceeding or falling below the thresholds of 10%, 25%, 50%, or 75% of the total charter capital of a fund management company that is not a public Company.	Within 24 hours	Within 4 hours from the occurrence of the event	

29	When the Company voluntarily terminates or ceases to provide one of the products, services and securities trading operations.	Within 24 hours	Within 4 hours from the occurrence of the event	
30	Whenever any information technology incident occurs that affects the executing securities transactions for the customers.	Within 24 hours	Within 4 hours from the occurrence of the event	
3. DISCLOSURE INFORMATION UPON REQUESTS				
	Based on the requests of SSC, Stock Exchanges in the following cases:			
1	Whenever any events occur that seriously affects the legitimate interests of investors.	Within 24 hours of receiving the request(s)	Within 4 hours of receiving the request(s)	
2	There is any information related to the Company that significantly affects the stock prices and needs to be verified.	Within 24 hours of receiving the request(s)	Within 4 hours of receiving the request(s)	

APPENDIX 2: GUIDANCE ON DISCLOSURE INFORMATION FOR OTHER SUBJECTS

1. Disclosure information on share ownership of majority shareholder and related groups of persons holding at least 5% of the total voting shares of the Company:

- Organizations and individuals becoming or ceasing the majority shareholders or groups of related persons holding at least 5% of the total voting shares of the Company shall disclose information and report transactions to the Company, SSC and Stock Exchange(s) according to the form specified in Appendix VII of Circular 96/2020/TT-BTC within 05 working days from the date of becoming or no longer being a majority shareholder.
- Majority shareholders, groups of related persons holding at least 5% of the total voting shares of the Company shall disclose information and report to the Company, SSC and Stock Exchange(s) within 05 working days from the date of any change in the number of shares held beyond the threshold of 1% of the voting shares, according to the form specified in Appendix VIII of Circular 96/2020/TT-BTC.

Note: Information disclosure obligations shall not be required for the entities that do not actively conduct transactions in case of changes in the holding ratio of voting shares arising from the Company's repurchase of its shares or the Company's issuance of additional shares.

The Company shall post on the Company's website within 03 working days after receiving the reports related to the changes in the share ownership ratio, share purchase rights, and fund certificates of these subjects.

2. Disclosure information of the insiders and related persons of the insiders:

The insiders and related persons of the insiders shall disclose information and report to the Company, SSC and Stock Exchange(s) before and after executing the transactions that the transaction value is at least 50 million per day or at least 200 million VND per month, based on the par value (for stocks, convertible bonds) or based on the latest issuance price (for secured warrants) or based on the transfer value (for stock purchase rights, convertible bond purchase rights), including cases of transfers not via the trading system at Stock Exchange(s) (such as transactions giving or being given, donating or being donated, inheriting, transferring or receiving the transfer of securities and other cases), specifically as follows:

- Before the transactions: At least 03 working days before the date of the transactions, The insiders and related persons of the insiders shall disclose information and report to SSC, Stock Exchange(s), and the Company on the expected transaction according to Appendix XIII of Circular 96/2020/TT-BTC (1).

- The deadline for executing transactions shall not exceed 30 days from the registration date for executing transactions. The insiders and related persons of them shall comply with the time, volume and value of information disclosed by the Stock Exchange(s) and may only execute the first transaction on the trading date immediately after the date of the information announced by the Stock Exchange(s) (2).
- In case of executing purchase transactions in the issuance of shares, fund certificates or public tender offers, the entities subjects disclosing under the provisions of this Clause shall be exempted from the obligations specified in this Clause and comply with the provisions of law on offerings, issuance and public offer.
- The insiders and related persons of them may not simultaneously register, trade in the purchase and sale of shares, stock purchase rights, convertible bonds, convertible bond purchase rights, fund certificates, fund certificates or secured warrants in the same transaction registration period and may only register, perform next transaction when the end of the previous transaction has been reported; except for cases where the fund management Company or branch of a foreign fund management Company in Vietnam is a related person of an insider who registers, buys and sells securities for ETFs or invests as designated by the trustee, but shall ensure that each trustee cannot register at the same time, buy and sell transactions in the same subscription (3).
- After executing transactions: Within 05 working days from the date of completion of the transaction (in case the transaction ends before the registration deadline) or the end of the expected transaction period, the insider and related persons of them shall disclose the transaction results and simultaneously explain the reasons for the failure to perform the transaction or fail to complete the registered volume (if any) according to the form in Appendix XV or Appendix XVI of Circular 96/2020/TT-BTC.
- The insiders and related persons who are the applicable subjects under Section 1 of Appendix 2, "Disclosure information of the insiders and related persons of the insiders," and are simultaneously applicable subjects under Section 2 of Appendix 2, "Disclosure information regarding shareholdings of majority shareholders and related groups holding at least 5% of total voting shares of the Company" shall only fulfill the disclosure obligations applicable to the insiders and related persons of such these insiders.

3. Notes

- The insiders and related persons of the insiders who are not the applicable subjects under Section 2 of Appendix 2 but are the applicable subject under Section 1 of Appendix 2 shall fulfill their reporting and disclosure information obligations as specified in Section 1 of Appendix 2 of this Regulation.
- The disclosure information obligations stipulated in (1), (2), and (3) of Section 2 of

Appendix 2 do not apply to the cases that the securities company force-sells the shares of the customers that are the insiders or a related person(s) of the insiders.

- After registering a transaction, the registered party is no longer an insider of the Company or a related person of an insider, the registered party shall still fulfill the reporting and disclosure obligations as required.
- If a securities company is a related entity of an insider of a listed or registered organization, the Company shall report to SSC, the Stock Exchange(s), and the Company within 24 hours from the time of completing the error correction transaction when correcting errors in trading listed or registered shares.
- When a parent Company, political organizations, socio-political organizations (such as trade unions, youth unions, etc.), or individuals holding other management positions as defined by the Company's Charter engage in securities transactions, they shall fulfill the disclosure obligations applicable to the insiders and related persons of such these insiders.
- Upon the receipt of the reports related to the share transactions of the Company's insiders and their related persons, the Company shall post on its website within 03 working days.

