SHINHAN SECURITIES VIETNAM CO., LTD.

INFORMATION DISCLOSURE AND REPORT REGULATION

(Promulgated with Decision no: 55/2020/QĐ-SSV on Nov 05th, 2020 of General Director of Shinhan Securites Vietnam Co., Ltd.)

DOCUMENT FOR FOLLOWING THE COMPILATION

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Compiling person and relative person

Creator	**No**	**Full name**	**Position**	**Team/Department**
	1	Nguyen Thi Linh Hue		Internal Control
	2			
Checker	1	Dao Thi Hong Van		Internal Control
	2			
Reviewer	1	Kim Hyeon Jin		Planning and Management
	2	Dao Thi Lan		HR-GA
	3	Doan Duy Su		ICT

	4	Dao Thien Huong		RM
	5	Nguyen Thanh Phu		RM
	6	Tran Mai Thy		CS
	7	Pham Thi Ngoc Nga		AC
Final Approver	1	Han Bokhee		GD

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1	09/09/2016		01	Mr. Jeong Man Ki
2	17/04/2017	Updated periodically	02	Mr. Jeong Man Ki
3	12/10/2018	Updated periodically	03	Mr. Kwon Hyuk Jun
4	05/11/2020	Changed all	04	Mr. Han Bokhee

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CHAPTER 1: GENERAL PROVISIONS

Article 1. Scope and regulated entities

1. This regulation provides the guidance on implementation of disclosure information and report obligations at Shinhan Securities Vietnam Co., Ltd.
2. This regulation does not apply to reports made through VSD's portal by Customer Service team.

Article 2. Purpose

This regulation aims to unify information disclosure and reporting activities to minimize Company's legal risk; besides, it is the basic for defining responsibilities of individuals/teams in implementing the obligation of information disclosure and reporting activities.

Article 3. Legal ground and references

1. Law on Securities No. 70/2006/QH11 dated June 29, 2006;
2. Law on Amending and Supplementing a number of articles of the Law on Securities No. 62/2010 / QH12 dated November 24, 2010;
3. Law on Enterprises No. 68/2014/QH13 dated November 26, 2014;
4. Decree No. 82/2007/NĐ-CP dated May 23, 2007 Regulating the provision of information serving the formulation and administration of the national monetary policy;
5. Decree No. 58/2012/NĐ-CP dated July 20, 2012 of the Government detailing and guiding the implementation of a number of articles of the Securities Law and the Law amending and supplementing a number of articles of the Law on Securities;
6. Decree No. 60/2015/NĐ-CP dated June 26, 2015 of the Government amending and supplementing a number of articles of the Government's Decree No. 58/2012/NĐ-CP dated July 20, 2012, detailing and guiding the implementation of a number of articles of the Law on Securities and the Law amending and supplementing a number of articles of the Law on Securities;
7. Circular No. 210/2012/TT-BTC dated November 30, 2012 guiding the establishment and operation of securities companies;
8. Circular No. 07/2016/TT-BTC on amending and supplementing Circular 210/2012/TT-BTC dated november 30, 2012 guiding the establishment and operation of securities company;
9. Circular No. 155/2015/TT-BTC dated October 6, 2015 on guiding the information disclosure activities on the stock market;

10. Circular No. 197/2015/TT-BTC dated December 3, 2015 provisions on securities practice;
11. Circular 123/2015/TT-BTC dated August 18, 2015 Guiding foreign investment activities on Vietnam's stock market;
12. Circular No. 115/2017/TT-BTC dated October 25, 2017 providing guidance on securities trading supervision on the stock market;
13. Circular No. 87/2017/TT-BTC dated August 15, 2017 on Prudential indicators and action against securities-trading organizations that fail to achieve prudential indicators;
14. Circular No. 134/2017/TT-BTC dated December 19, on providing guidelines for e-transaction of securities market;
15. Circular 146/2014/TT-BTC dated October 06, 2014 on Finance regulations for securites companies, asset management companies;
16. Circular 35/2013/TT-NHNN dated December 31, 2013 on guidling implemention of member of provisions on prevention of money laundering;
17. Circular No. 31/2014/TT-NHNN dated 11 November 2014 on amendents and supplements a number of articles of the Circular No. 35/2013/TT-BTC dated 31/12/2013 on Guiding the implementation of a number of provisions on Anti-money laundering;
18. Circular 20/2019/TT-NHNN dated 14 November 2019 on amending a number of articles of the Circular No. 35/2013/TT-BTC dated 31/12/2013 on Guiding the implementation of a number of provisions on Anti-money laundering.
19. Circular 03/2016/TT-NHNN dated February 26, 2016 on providing several instructions on foreign exchange administration in respect of enterprise's foreign borrowing and foreign debt repayment of enterprises;
20. Regulation guiding the margin trading, issued together with Decision No. 87/QĐ-UBCK dated January 25, 2017;
21. The Regulation guiding the establishment and operation of the risk management system or securities company issued together with Decision No. 105/QĐ-UBCK dated February 26, 2013;
22. Membership Regulation of Ho Chi Minh City Stock Exchange issued together with Decision No. 04/2013/QD-SGDHCM dated May 20, 2013 and related amendments and supplements;
23. Membership Regulation of Hanoi Stock Exchange issued together with Decision No. 309/QĐ-SGDHN dated 27/05/2015 2013 and related amendments and supplements;

24. The Regulation on Membership of the Vietnam Securities Depository, issued together with Decision No. 25/QĐ-VSD dated 13/03/2015;

25. Regulations on information technology infrastructure connected to Hanoi Stock Exchange issued together with Decision No. 525/QĐ-SGDHN dated August 18, 2015.

Article 4. Definitions

1. This Regulation applies to:

a) "**Company**"or "**SSV**": Shinhan Securites Vietnam Co., Ltd.

b) "**Regulation**": Information disclosure and report regulation of SSV and amendments and supplements (if any) from time to time.

c) "**Charter**": Charter of SSV and amendments and supplements (if any) from time to time.

d) "**SSC**": State Securities Commission.

e) "**Stock Exchange**" or "**SE**": Ho Chi Minh Stock exchange or Hanoi Stock exchange;

f) "**VSD**": Vietnam Securities Depository.

g) "**MC**": Members' Council of SSV.

h) "**GD**": General Director of SSV.

i) "**IC**": Internal Control team;

j) "**HR**": Human Resources team;

k) "**Planning**": Stratey and Planning team;

l) "**AC**": Finance and Accounting team;

m) "**ICT**": Information and Communication technology team;

n) "**CS**": Customer service team;

o) "**BD**": Business Development;

p) "**MP**": Marketing and Partnership team;

q) "**RM**": Risk Management team;

r) "**IA**": Internal Audit;

s) "**SCMS**": Securities Company Management System.

t) "**CIMS**": Company information management system.

u) "**FMSIS**": Financial Market Supervision Information System.

v) "**Reporting team**": units/teams get main responsibilities reporting activities are listed in the attached appendixes.

w) "**Information provision team**": units/teams get main responsibilities for providing information/data/document to **Information Disclosure team** or **Reporting team** are listed in the attached appendixes.

2. In this Regulation, references to one or more regulations and/or any document shall include amendments, supplements or substitutions of such regulation and/or documents.

3. For the capitalized words but not defined in this Regulation, if not in conflict with the context or subject matter of this Regulation, shall have the same meaning as provided in the Company Charter and/or Relavant legal document.

Article 5. Principles of disclosuring information and reporting

1. The information disclosure must be sufficient, accurate and punctual as prescribed by law and:

   a) Each discloser shall bear responsibility for the disclosed information. If there are changes in the disclosed information, the discloser must disclose the changed contents and reasons for the changes;

   b) Disclosuring information must concurrently report to the SSC and the Stock Exchange, including all required information.

   c) The language of disclosed information on the Vietnam securities market must be Vietnamese. The disclosed information in English is provided for reference only.

   d) In case the obligation to disclose information falls on a day-off or a holiday as prescribed, the disclosers shall disclose information on website and completely fulfill obligation to disclose information as prescribed after the day-off or the holiday.

2. The reporting must comply with the provisions of law and ensure:

   a) Fully, promptly and accurately reflect the actual situation of the Company.

   b) The Company must submit periodic reports in electronic data files and/or documents to SSC, SE, VSD, NFSC and SBV according to the deadline and legal provisions from time to time.

Article 6. Means of information disclosure and reporting

1. Perform of Information disclosure

   a) Website of Company;

   b) Securities company management database system of SSC (SCMS);

2. Reporting Perform

   a) Securities companies management database system of SSC (SCMS);

b) Companies information management system of SE Hanoi (CIMS);

c) Enterprise content management of SE HCM (ECM);

d) Financial market supervising information system of NFSC (FMSIS);

e) Other communication platform such as email, fax... as requested by the competent agencies.

Article 7. Medias of Performing Information disclosure and Report

1. Information disclosure must be posted on website of the Company, SCMS system of the SSC and at the same time report to the SE in accordance with the law from time to time.

2. Documents and reports sent to SSC, SE, ... are presented in the form of documents and/or electronic data under the guidance of these competent agencies.

Article 8. Disclosers

1. Company shall disclose information via a legal representative or a person authorized to disclose information (hereinafter referred to as the authorized person) of such organization.

2. The legal representative shall bear responsibility for the sufficiency, accuracy and punctuality of the information disclosed by the authorized person. When occurring an event that needs information disclosure but both the legal representative and the authorized person are absent, the member holding the highest position of the Board of Management or Members' Council shall conduct the information disclosure.

Article 9. Storage

The Information Disclosure team or Reporting team are responsible for preserving and retaining the disclosed, reported information according to the following regulations:

- Keep in writing (if any) and electronic data for at least 10 years.
- Keep on the website (if any) for at least 05 years.

CHAPTER II: ROLE, RESPONSIBILITY, RIGHT

Article 10. Roles and responsibilities of Legal representative

1. Roles

   Performing information disclosure and reporting of the Company in accordance with the law.

2. Responsibilities

   a) Checking, approving or authorizing other titles to inspect and/or approve the content of the report, dislclosured information in accordance with this Regulation.

b) To be responsible to the Owner, Members' Council, Authorities and the Law for the content, completeness, accuracy and timeliness of reports and information made by themselves or their authorized persons (in case of authorization).

Article 11. Roles and responsibilities of authorized persons

1. Roles

   The person authorized by the Legal Representative to perform work related to the Company's information disclosure/report to the competent authorities in accordance with the law.

2. Responsibilities

   a) Implementing information disclosure/report in accordance with the Law within the scope of authorization and Company' internal regulation.

   b) Checking the accuracy of report/ information before sending.

   c) Making ensure that authorized information disclosure/report is complete, accurate and timely in accordance with the Law.

   d) To be responsible to the Legal representative for the information disclosure/report that is approved by him/her.

Article 12. Roles and responsibilities of Internal Control team

1. Roles

   Internal Control team has the role of supporting the implementation of information disclosure comply with the Law and this Regulation.

2. Responsibilities

   a. To ensure the information disclosure obligation is always performed accurately and timely as prescribed by law.

   b. To ensure the accuracy and consistency of the content of information received from other teams and the contents to send Authorities.

   c. To request the other teams to provide information/report and document/dispatch to explain (if any) on time as prescribed by Law and this Regulation.

   d. To draft and request for editing/removing of error information, updating the accurate information.

   e. To propose, recommend the amendment and supplementation of this Regulation to ensure compliance with the Law and effectiveness of this activities.

   f. Updating the provisions, forms on information disclosure for relevant teams.

g. To be responsible to the Board of Mangement for Information disclosure activity.

h. Management, storage the document compliance with provisions.

Article 13. Roles and responsibilities of Reporting teams

1. Roles

a. To implement the report/ provide information/ synthesize report as assigned.

b. To send report to Competent Authorities as prescribed and upon request.

c. To provide reports that need to disclose information made to the Internal Control team to perform the information disclosure on time.

2. Responsibilities

2.1 Providing report for information disclosure:

a. To provide the performed report that need to be disclosured to Internal Control team.

b. To proactively provide the report as soon as possible and within the time limit prescribed by law.

c. To make and be responsible for the explaining dispatch as requested by Authorities.

d. To be responsible to Board of Management for the accuracy of reporting content and timeliness of providing report.

2.2 Performing report:

a. To synthesize data, information from the Information provision teams for reporting.

b. To make e-approval and submit to the competent person for the approval of reporting content before sending the report to Authorities.

c. To storage the report and document relevant to the report as prescribed.

d. To explain for content of reports as requested by Authorities.

e. To be responsible to Board of Management for the accuracy and timeliness of the reports provided by team.

f. To be responsible for securing information to access/login the portal/reporting system such as (SSC, CIMS, FMSIS ...) and digital signature.

Article 14. Roles and responsibilities of Information provision teams

1. Roles

a) To provide data/information to Reporting teams to make report or Internal Control team to conduct information disclosure.

b) Synthesize and provide data/information as assigned or as requested.

2. Responsibilities

2.1 Information of event to conduct information disclosure:

a) To provide information, content of the event need to disclose to Internal Control team for information disclosure.

b) To proactively provide information as soon as possible and not more than 12 hours from the occurrence of event that requires disclosure.

c) To prepair the disclosing content and make the e-approval to submit to the competent person for approval; notify to Internal Control team and put it on "Reference" on approval route.

d) To be responsible for explaining the disclosing information as requested by competent authorities.

e) To be responsible to Board of Management for the accuracy and timeliness of the event/report information provided by team.

2.2 Reporting data:

a) To provide data/contents of reports as assigned or as requested by related teams.

b) To storage reporting data as prescribed.

c) To be responsible for explaining on the report as requested by competent authorities.

d) To be responsible to Board of Management for the accuracy and timeliness of report/information provided by team.

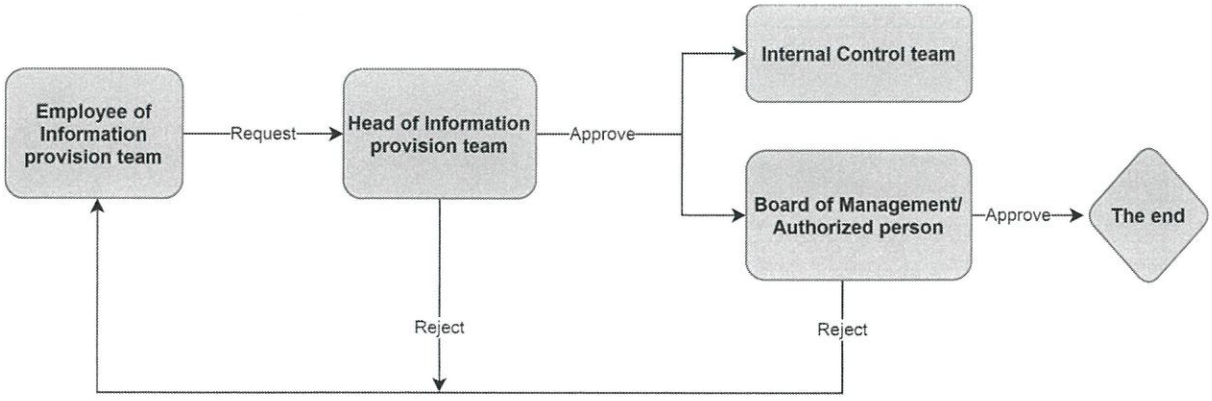
CHAPTER III: PROCESS OF INFORMATION DISCLOSURE AND REPORTING

Article 15. Process of information disclosure

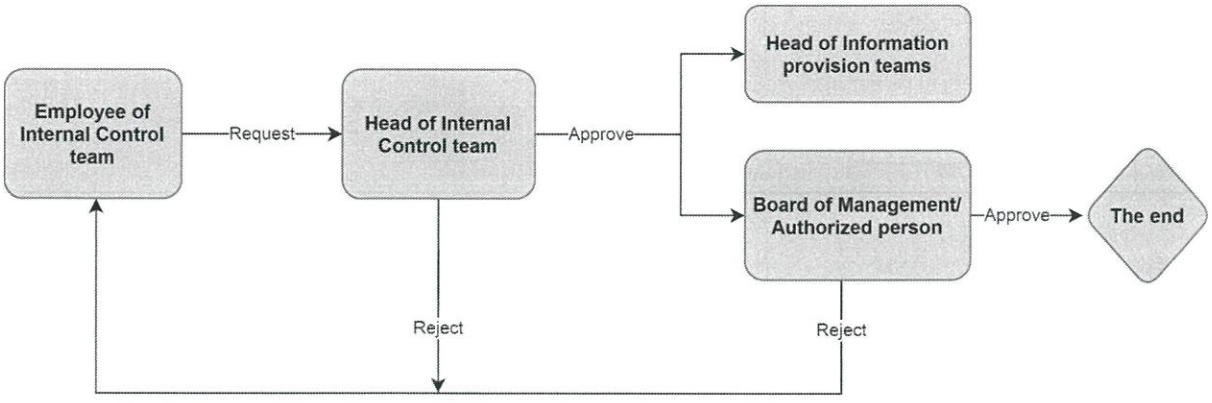
1. When arising event need to be conducted the information disclosure according to the Law and this Regulation, the Information provision team must immediately inform Internal control team via phone; at the same time, makes e-approval and attachs all data, document, evidience of the occurance to submit to the competent person for approval as flowchart 15.1. The content of e-approval have to show clearly the purpose "For information disclusure - xx hours"

2. Internal control team must monitor the status of approval on e-approval system, drafts the dispatch of information disclosure and submits the dispatch for final approval via e-approval system as flowchart 15.2
3. Internal control team conduct information disclosure on time according to the law and keeps record of information disclosure as precribed.

Flowchart 15.1: Approval route on e-approval system for Information provision team.



Flowchart 15.2: Approval route on e-approval system for Internal Control team

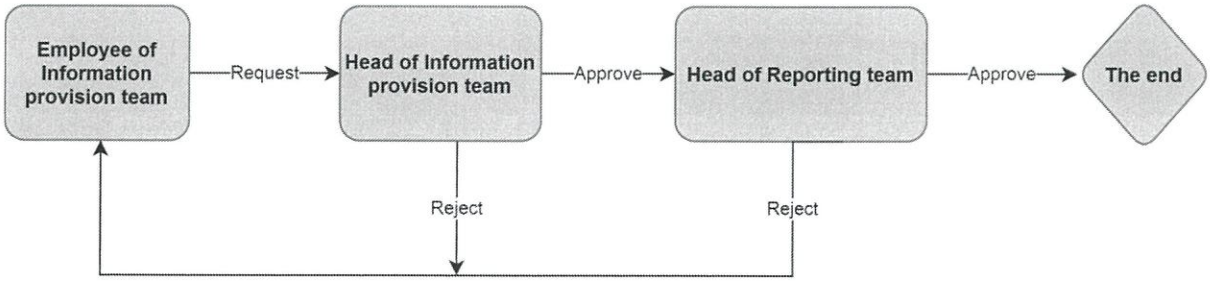


Article 16. Process of reporting

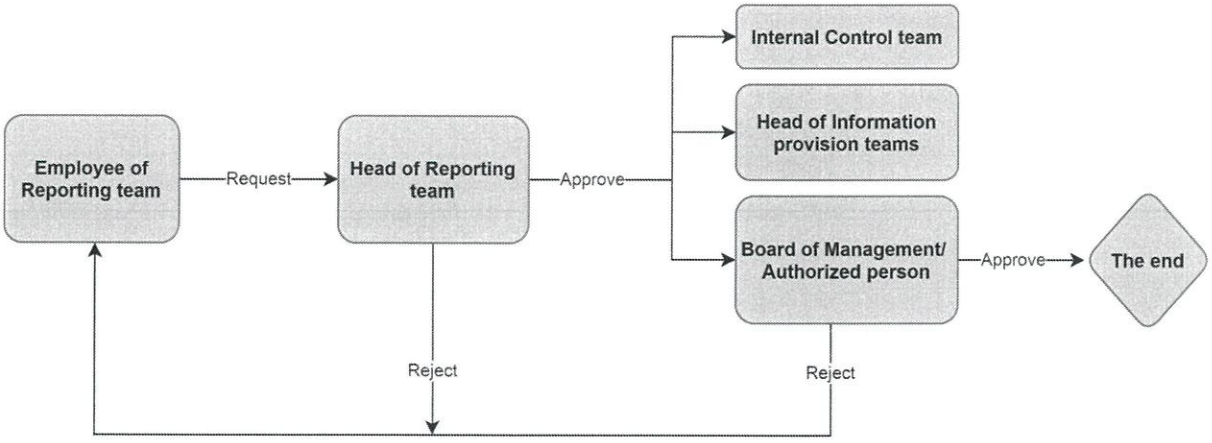
1. The reporting team makes the report(s) according to the attached Appendices of this Regulation. Collecting data/ information from the providing information individual/ team (if any) to make the report as prescribed form.
2. The Information provision team conducts and sends data/document to Reporting team via e-approval as flowchart 16.1. In case of necessity, in order to ensure that reporting activity is carried out on time, the Information provision teams can flexibly send data/document to the Reporting team via other channels (phone, email, paper document,...) and supplement on e-approval system as flowchart 16.1 after that.

3. The reporting team makes e-approval to submit the report to competent person for approval; puts Internal control team and Information provision teams (if any) on "Reference" on the approval route for notification as flowchart 16.2.
4. With the report need to conduct the information disclosure, the reporting team must send the hard copy of conducted report to Internal Control team for information disclosure.
5. Reporting team keeps record as prescribed.

Flowchart 16.1: Approval route on e-approval system for Information provision teams.



Flowchart 16.2: Approval route on e-approval system for Reporting team.



Article 17. Implementation information disclosure/reporting in emergency situations.

For emergency situation, in order to avoid delay in performing the obligations on report/information disclosure, the Information provision team or Reporting team must proactively seek approval from the authorized person in any appropriate form to ensure the report/information disclosure is on time. The lacking document, procedure must be supplemented/completed in the next working day.

CHAPTER VI: IMPLEMENTATION

Article 18. Effect

1. This Regulation takes effect from Nov 05th, 2020 and replaces Report and Disclosure Information Regulation dated October 12th, 2018 issued by General Director.
2. The related subject shall implement this Regulation.

Article 19. Amendment, supplementation

1. The amendment and supplementation of this Regulation is considered and decided by Board of Management.
2. In cases, there are legal provisions related to Information disclosure/ reporting activites of Company that have not been mentioned in this Regulation or there are any new provisions of law that are different from this Regulation, those provision of law shall automatically apply and shall adjust this Regulation.