

CODE OF CONDUCT QH PLUS CORPORATION

V 1.0



Integrity



Innovation



Dedication



Care

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Message from the Chairman

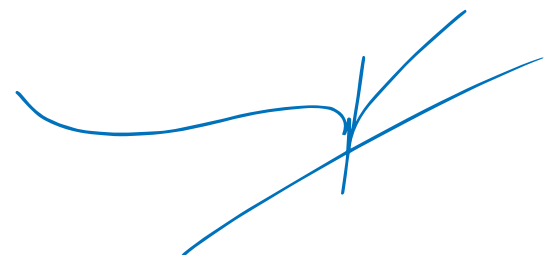
At QH PLUS, integrity and innovative thinking are core values for each of QHPers to respect and uphold. Our acts are based on the solid values selected by QH PLUS to guide our business strategies and behaviors, and inspire our business goals, models and paths to profitable and sustainable growth.

The Code of Conduct of QH PLUS is a part of the Group's human resource development strategy to guide and develop QHPers to become responsible, ethical and civilized citizens in the organization as well as in the society. The Code of Conduct serves as basis for the Group's most important policies and principles.

The establishment of a company where we are proud to work at, where everything we do and every decision we make is guided by the principles of integrity, ethics and respect for people and the living environment. Complying with the above principles is the duty and responsibility of every QHPer regardless of his or her position in the organization. The management board strongly believes that the honest and ethical approach is vital to the success & development of QH PLUS.

Just thinking is already meaningful, but taking actions delivers real value. Read the Code of Conduct to understand what each QHPer is expected and asked to do. Remember that this Code of Conduct does not cover all situations you may find yourself in, and it is not always easy to clearly define the right course of action. Whenever you have questions or concerns about such real-life situations, do not hesitate to ask for help from managers and the Board of Management.

Chairman of the Board of Directors



Nguyen Quang Huy

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Scope & Subjects of application



2.1

How does this Code of Conduct apply?

This Code of Conduct applies to all employees of QH PLUS Group, its subsidiaries, joint ventures, affiliates and all other representatives acting on behalf of QH PLUS Group, including full-time and part-time employees, consultants, contractors, senior

managers and members of the management board of subsidiaries in QH PLUS Group.

All employees and other representatives are responsible for complying with this Code of Conduct.

2.2

For partners and suppliers

QH PLUS undertakes to comply with high standards of human rights, labor rights, environmental responsibilities and anti-corruption in all business processes and activities, which means that we ask the same from our partners.

We expect our suppliers and partners to respect human rights and follow business fundamentals and fair competition.

Our committed and responsible partner policy supports procurement decisions by assessing potential suppliers, monitoring supplier performance and implementing customer commitments in transaction agreements.



| 2.3

Managers are expected to be role models

If you are a manager at QH PLUS, you are expected to be a role model through your behaviors, actions and decisions. This means that you need to abide by the Code of Conduct. It is your responsibility to ensure that everyone in your team is properly trained to understand and comply with the Code of Conduct,

related policies and guidelines. You are also obligated to take actions and report all violations of the Code of Conduct and the Group's policies.

| 2.4

Legal compliance

We will operate in full compliance with the laws and regulations applicable to our operations. We will also conduct business in accordance with this Code of Conduct and our policies and guidelines. If this Code of Conduct and our regulations conflicts with the law, whichever regulations are stricter shall prevail, provided there shall be no violation of enacted legal provisions.

| 2.5

When in doubt, seek legal advice

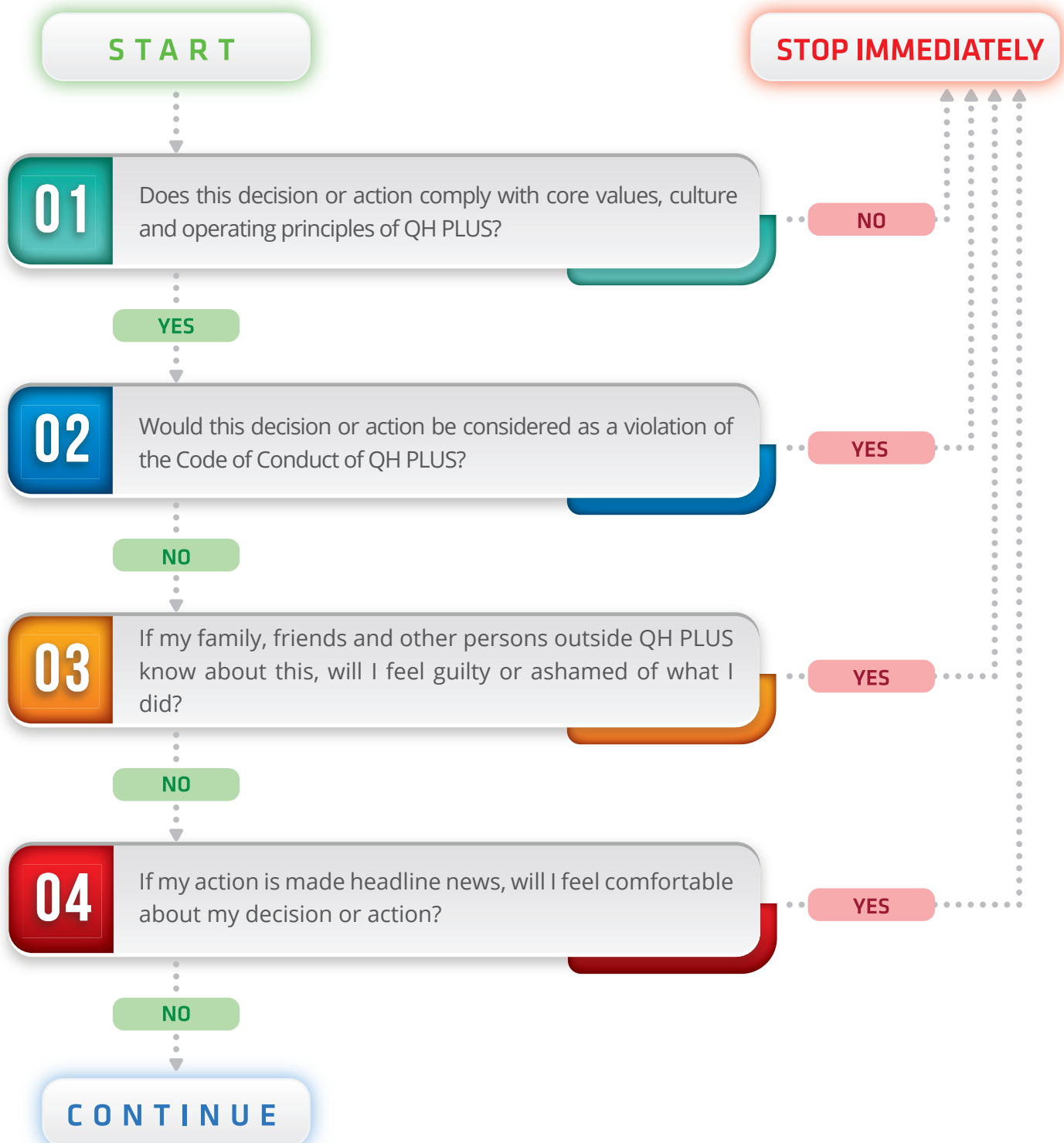
Timely legal advice is necessary to protect the interests of QH PLUS and to ensure that we comply with relevant laws and regulations. You may encounter situations where this Code of Conduct does not provide clear answers. In such situations, you need to discuss the matter with the Board of Management or the representative lawyer's office of QH PLUS.



2.6

Handling a difficult situation in an emergency without guidelines or regulations

If you are in a situation where you are unsure of what to do, ask yourself the following questions in accordance with the Code of Conduct of QH PLUS to help you decide on the appropriate course of action:



2.7

When a violation occurs

Employees committing unethical act or in breach of this Code of Conduct or the Group's policies may be subject to disciplinary action. Depending on actual conditions and circumstances, disciplinary action might include dismissal.

In many cases, provisions in this Code of Conduct and related policies and guidelines are based on provisions of law, which means that your non-compliance may lead to disciplinary action and legal action against you as well as against QH PLUS.



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We will operate in full compliance with the laws and regulations applicable to our operations

2.8

Report your concerns

If you encounter any violations of this Code of Conduct or the Group's policies, you should raise your concerns with your manager or with the officer in charge of handling such violations or the Board of Management for consideration and resolution.

If finding it difficult to report in person, you may report via email: gopy@qhplus.com

All employees are expected to report any information on potential violation of any employee or representative of QH PLUS.

Anyone reporting a concern should know that QH PLUS has a strict policy of non-retaliation. This guarantees that there is no adverse consequence upon employment for any employee reporting to the Board of Management on potential violations of this Code of Conduct in good faith.



All employees are expected to report any information on potential violation of any employee or representative of QH PLUS

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Human dignity is central to create a working environment at QH PLUS



Driven with the philosophy of inheritance and combination aimed at optimizing its resources, QH Plus delivers added value and comprehensive solutions to its customers in the field of design, production, supply and construction. We cherish good values, work standards and desire a prosperous and safe future for our customers, employees, shareholders and the community.

To reach the destination together, enjoy and grasp that glorious prosperity, this journey can only be achieved thanks to the most valuable asset of QH PLUS, that is people.

3.1

Our declaration of human rights

QH PLUS will make every effort and undertake to protect human rights through words and actions. We will always act ethically and respect human rights in accordance with Vietnamese Law & International Human Rights Law and the International Labor Organization's (ILO).



3.2

Impact on QHPers

QH PLUS must always consider how every action and decision will affect our employees and those around us. We try to do business without harm to people, whether caused directly by us or indirectly through our business partners and suppliers.

An important part of human rights is labor rights and working conditions. The rights of employees and those working for our suppliers or partners must always be respected and we will strive to ensure high labor standards.

We do not tolerate child labor, forced labor, discrimination, harassment or abuse. We are solidly committed to working hours and remuneration, freedom of association and collective bargaining. The health and safety of our employees are top priority, and we always make every effort to manage and reduce accident or illness risks.

What does this mean to QHPers?

Upholding human rights is the responsibility of every manager and employee at QH PLUS. In your working area, consider how your activities, actions and decisions may impact people, and minimize any negative impact.

If you find out a human right threat, report it immediately to the HR manager or HSES officer, the Board of Management. You may also report via email: gopy@qhplus.com



3.3

Working & Communication

Creating a culture of civilized communication and behavior is always a concern of QH PLUS and requires all of our strict observance in order to build healthy and in-depth development relationships between QHPers as well as with partners, customers and relationships in the community.



What does this mean to QHPers?

Let's practice 4C+ (Chào - Greet, Cười - Smile, Chúc mừng - Congratulate, Cảm ơn - Say thank, + Xin lỗi - Sorry) anytime, anywhere with any relationship in work & life.

Use clear and transparent language. Do not use gross or inciting language in verbal or written communication.

Use email or social media in a responsible manner and follow QH PLUS usage principles and guidelines.

Understand and apply basic business skills and practices that QHPers often encounter such as: greeting, exchange business cards, sitting in meeting rooms and entertainment parties, civilized dining, professional presentations & discussion, etc. QH PLUS encourages every employee to study skills for civilized and happy life by themselves through official information channels and reputable organizations to become a global employee and citizen.

Find out more details on relevant guidelines and regulations with your manager or the HR Department.

Understand and
apply basic business
skills and practices
that QHPers often
encounter



3.4

Salary, bonus & working hours

At QH PLUS, the balance between work and private life is always encouraged.

We setup a good Total Rewards System based on job performance in order to build a company with leading income.



What does this mean to QHPers?

Income and labor productivity always go hand in hand. QH PLUS encourages productivity improvement solutions to help increase income for QHPers at the top position in the industry.

QH PLUS encourages reward and recognizes valuable initiatives, improvements or outstanding achievements in the working process. Discuss with your manager if you think you have made such achievements.

Taking annual leave is encouraged to balance and regenerate creativity and labor strength.

Be self-disciplined and strictly and responsibility adhere to working hours. QH PLUS's main concern is the work results generated by employees. However, for some positions, it is necessary to strictly comply with working hour to deliver work results.

For further guidance and information on salary, insurance, bonus and benefits & allowances, contact HR department or your direct superior.



3.5

HR training, development and promotion opportunities

QH PLUS defines the criterion “LEARN” in the key strategy of 4Ls to clearly show its point of view that QHPer training and development will be the focus in the sustainable development strategy.

The creation of capacity criteria, development of training programs, assignment of appropriate authority, appointment and transfer are considered necessary and serious actions of the Group.



What does this mean to QHPers?

You will be continuously trained, studied and practice.

QHPers' promotion opportunities within the Group are fair and based on your learning process, personal development and specific achievements in the organization.

Refer the Competency framework to find out knowledge and skills that you need to be trained for your current position. If you need further training, don't hesitate to raise your request with the management or HR department.

QHPers' promotion opportunities within the Group are fair and based on your learning process, personal development and specific achievements in the organization



3.6

Open and straightforward dialogue

QH PLUS is committed to build a constructive relationship with its employees and keeps trying to develop a sincere, open and fair working environment.

We aim at open and transparent dialogues to enable employees to directly join dialogue on all issues related to the legitimate interests of all QHPers with the Management Board.



What does this mean to QHPers?

If you have any disagreement with your superior, the open, frank and transparent direct communication is encouraged to be taken at a suitable place in a sincere and truth-seeking atmosphere necessary for conversation. Retaliation is strictly prohibited at QH PLUS, so feel free to speak out your mind.

The conversation between the trade union representatives/ employees and the Board of Management must be constructive, respectful and held annually.

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QH PLUS
is committed to build
a constructive relationship
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environment

3.7

No discrimination allowed

Discrimination is not tolerated in our working environment. No one can be discriminated because of personal characteristics or belief, sex, age, religion, marital status, race, position, status, social background, illness, disability, maternity, ethnic and national origin, nationality, membership in employee organizations including trade union or politic organization. All employees must always be treated strictly according to their ability and capacity in any employment decision.

3.8

Abuse and harassment

As part of our commitment to a diverse and inclusive workplace, we do not tolerate harassment and bullying. Abusive behaviors in the workplace, such as repeated negative actions against employees, are not allowed. All employees will treat each other with respect, dignity and courtesy.

Harassment can be in the forms of written or verbal comments, gossip, jokes and ridicule, defamatory or offensive language or comments, or bullying, with those in power abusing their positions to commit offense, threats or malicious behaviors.

What does this mean to QHPers?

Regardless of differences, location, age or other types of discrimination, treat everyone with respect, sincerity and courtesy.

Ensure that any employment, assignment, reward & disciplinary decisions were made without discrimination.

For further instructions, contact HR Department or the Board of Management.

What does this mean to QHPers?

Treat everyone with respect and courtesy.

Never send emails, text messages, or make phone calls with explicit or insinuating sexual content, or make derogatory comments or ridicule another's ethnicity or religion, gender, physical characteristics, or disability.

Do not ask intrusive questions about others' personal lives and do not repeat unwelcome social invitations or sexual innuendos.

Do not abuse your dominant position over lower-level employees.

Speak up if you see a situation where someone is being bullied or abused.

| 3.9

Child and forced labor

QH PLUS has zero tolerance for the use of child or forced labor or labor trafficking of any kind.

In addition, we do not tolerate sexual abuse, exploitation or harassment against any individual without their consent or for money while on a business trip or as a representative of QH Plus.

What does this mean to QHPers?

If you see anything that may pose a risk of child labor, forced labor or human trafficking in connection with QH PLUS activities as well as activities of its supplier or partners, please report immediately to HR department and the Board of Management.



QH PLUS has zero tolerance for the use of child labor

4

Do business
with integrity and
fairness



| 4.1

Customer-centric approach

Customers are at the heart of all policies, operating systems and business ideas of QH PLUS. All legitimate needs of customers are always seriously considered and handled in every thought and action of QHPers.



What does this mean to QHPers?

Consider the customer satisfaction of QH PLUS products and services as the ultimate goal to serve on the basis of committing no violation of ethical values and basic laws widely recognized in the business culture.

Always put yourself as a customer when designing, manufacturing or providing a service to properly understand customers' desires and needs, thereby finding the optimal solution to satisfy them.

In the event of a customer request that you do not know how to handle, contact your direct superior for advice.

| 4.2

Competing with integrity

Competition laws are implemented in Vietnam and around the world to protect competition on the market. These laws prohibit non-competitive agreements and abuse of a dominant position in the market.

At QH PLUS, we believe in a transparent, fair and competitive marketplace. We compete on the true value of our products and services. We do not engage in illegal actions according to competition laws, and all QH PLUS employees are expected to strictly adhere to the laws on fair competition.

The consistent view of QH PLUS is that we perceive no one as zero-sum competitors, but only have partners for mutual development.

What does this mean to QHPers?

Never engage in any agreement or memorandum of understanding with a competitor regarding price fixing, commercial and production conditions, technical development, bidding, customers, market sharing or other marketing activities.

Respect customers. Never attempt to impose prices or try to limit a customer's legitimate rights under the published sales policy.

No hostile behavior, view, or decision with fatal impact upon competitors is allowed. Build partnerships, market shares basing on competence and conditions of each business.

4.3

Partnership & fair cooperation

QH PLUS strives to gain the trust of stakeholders by also taking into account their diverse interests, not just pursuing our own.

What does this mean to QHPers and partners?

Think, act, and make decisions on “win-win” principle.

Treat customers, suppliers, and subcontractors with fairness, regardless of roles and corporate positions in business and cooperation agreements. QH PLUS strictly forbids thinking and acts of “Kiss up kick down”, bullying in relationships with partners.

Protect legitimate interests of QH PLUS according to the law, basic principles of business and require compliance with commitments and agreements (in written, contractual covenants and even verbal expression) from partners who are customers, suppliers, subcontractors, investors, banks, etc.

If you find out any unfair treatment in transactions, report it to the Management Board for resolution or send your feedback to the following email: gopy@qhplus.com

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Treat customers, suppliers, and subcontractors with fairness, regardless of roles and corporate positions in business and cooperation agreements



4.4

Product quality and safety always come first

QH PLUS complies with legal regulations and our own standards on quality and safety while designing, developing, manufacturing, marketing and selling our products. Our products will not be delivered to customers until they fully meet our quality requirements and safety standards. We offer our products and services in an accurate and honest manner, and proofs are needed in support of our statements.

What does this mean to QHPers?

Always comply with all legal requirements as well as QH PLUS policies related to our design, production, sales, transportation, construction and erection.

Never take shortcuts or make compromise decisions on product safety.

Do not manipulate product testing or product quality inspection results.

Do not provide inaccurate information on quality, safety or other aspects of our products or services.



4.5

Understand the laws & regulations in the field of trade and construction

As a company engaged in construction industry, QH PLUS must comply with the law on construction, law on labor safety, related standards, regulations and guidelines. Accordingly, commercial regulations and terms in sales and construction contracts need to be strictly and thoroughly reviewed and examined.

Violations not only cause damage to our reputation, but also may result in criminal liability to the Company and related individuals. Commercial regulations, standards, and laws are always complicated and frequently updated. Their application is different depending on conditions and laws in each country, so it is important to understand and apply them properly and accurately.

What does this mean to QHPers?

Employees engaged in commercial, import-export, construction activities must comply with applicable commercial laws, regulations, conditions, and guidelines.

Determine when a commercial activity or business transaction can lead to a situation subject to export control regulations and trade sanctions.

Perform due diligence for high-risk markets, customers, or situations. Be aware and take action upon any warning of potential danger in conducting business and construction.

For guidance, consult your direct superior or the Group's legal counsel office.

As a company engaged in construction industry, QH PLUS must comply with the law on construction, law on labor safety, related standards, regulations and guidelines



4.6

Anti-corruption

Corruption is the abuse or misuse of delegated power for personal gain. QH PLUS does not tolerate corruption in any form. QH PLUS and anyone acting on its behalf (including third parties) shall not engage in or support any corrupt practices.

Corruption can take the form of: cash, gift cards or certificates of great value, commissions or kickbacks.



Make decisions with integrity, do not let partners or suppliers bribe us with materials in exchange for benefits in their favor



What does this mean to QHPers and partners?

Make decisions with integrity, do not let partners or suppliers bribe us with materials in exchange for benefits in their favor. This action causes financial and reputation losses to QH PLUS.

You, companies, members of your family and your friends must not accept any improper benefits from your position as an employee or representative of QH PLUS.

You will not be demoted, fined or subject to other adverse consequences for refusing to engage in corrupt practices.

You must compensate for any damages or may be subject to legal liability or criminal prosecution for serious violation.

If you are offered an inappropriate gift or a favor, or if you receive a request from a partner, or find negative concerns from another person in the organization, make a report at once. On the contrary, if a partner receives suggestions from an employee of QH PLUS or is required for specific benefits in exchange for favor at work, please report the problem to the Group's Chief Executive Officer or advise the case via email: gopy@qhplus.com for handling.

| 4.7

Gift & hospitality

Business gifts and hospitality must be an act of goodwill and not a return of favor for doing business with us. Similarly, gifts and hospitality offered by or received from employees of customers or suppliers - including potential customers and suppliers - can be considered bribes if we fail to meet certain criteria for generally accepted gifts and hospitality.

Regarding the value of gifts offered by a partner to the Company and individuals in business practices, QHPers should comply with the requirement of not receiving gifts worth more than VND 3 million. We encourage the recipient to hand over the gift to HR department for record and distribution for the common purpose of the organization or for charity in an open and transparent manner.

What does this mean to QHPers?

You are allowed to receive gifts in kind from partners in accordance with business practice, culture of each company and country.

Ensure that such gift acceptance causes no impact on business decisions to the detriment of QH PLUS interests and has a value below the specified limit.

The reporting and transfer of gifts for common corporate purposes and charity work are encouraged.

Regarding the value of gifts offered by a partner to the Company and individuals according to business practices, QHPers should comply with the requirement of not receiving a gift worth more than VND 3 million



| 4.8

Conflict of Interests

When a personal matter might influence a business decision, it is a conflict of interest. The best way to resolve conflicts of interest is to avoid them altogether. In the event of a conflict, you should be open and transparent about that situation.

These conflicts can take various forms such as:

- Job beside your official employment, where the interests of one job conflict with another.
- Due to family interests, where a family member or other relative is hired or supervised by you.
- When goods or services are purchased from a relative or friend or a company controlled by any of the above.
- If you or your family member have/has a financial interest that may influence your decision. Also, when you or your family member have/has a direct or indirect personal interest in any of QH PLUS's suppliers or customers.

What does this mean to QHPers?

Do not engage in employment outside the Company or join activities that may conflict or appear to have a conflict of interest with QH PLUS or may hamper work efficiency or affect your performance of obligations to QH PLUS.

Immediately disclose or report any conflict of interest that you may have to the Management Board for review and specific decision on the matter in an open and transparent manner.



The best way to resolve conflicts of interest is to avoid them altogether. In the event of a conflict, you should be open and transparent about that situation

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5

Innovation is the driving force for development

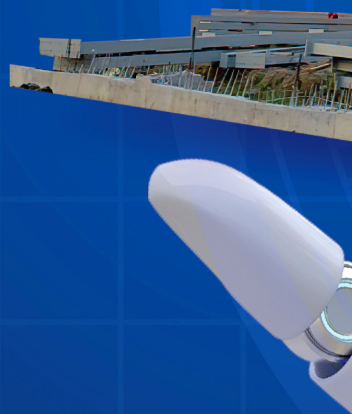


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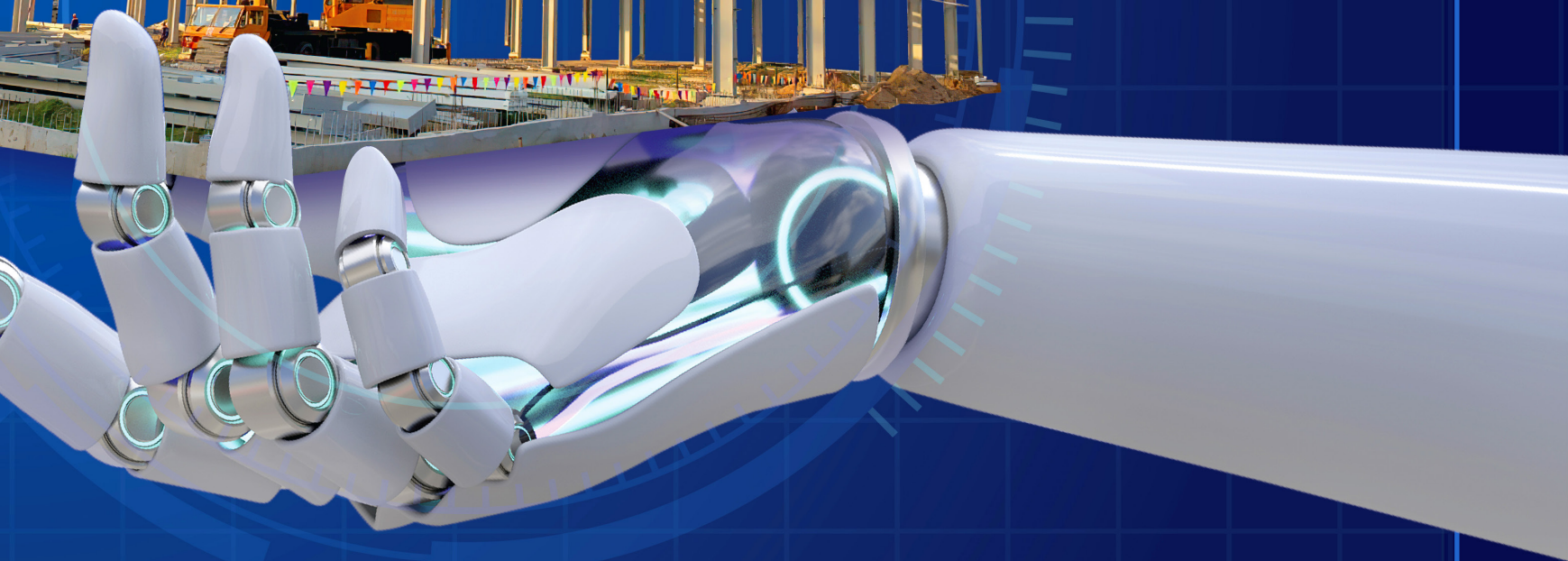
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ghplus®

BUILDING A SAFE LIFE

3K 3P



STEEL STRUCTURES
& P.E.B



REINFORCEMENT
STEEL BAR



WELDED MESH



STEEL PLATE,
COIL & SECTION



CONSTRUCTION
ACCESSORIES



FINISHING
MATERIALS



ALUMINUM &
GLASS PRODUCTS



5.1

QH PLUS innovates to provide customers with added value by our constant creativity and improvement

Innovation is our core value, orientation for setting up business strategies, a measure in the course of product and service development, and also a basis for carrying out daily production and business activities of each QHPer.

What does this mean to QHPers?

Keep asking yourself how to improve the quality of products, services or your work results according to 3K3P criteria of QH PLUS. Do not maintain a conservative and local mindset, but be open to comments & new ideas.

Innovation associated with customer needs and desires and in harmony with the environment, social development trend is the basis for decision, approval for implementation.

Initiatives and improvements are always appreciated, recognized and properly rewarded at QH PLUS. Report to your manager any improvements or initiatives you have made or plan to make.



Initiatives and improvements are always appreciated, recognized and properly rewarded at QH PLUS



5.2

QH PLUS innovates without fear of failure

Ideas, initiatives, changes are usually associated with fear of failure, responsibility, loss and pressures. They create barriers that make us hesitate to decide or act. QH PLUS always welcomes new ideas in business, initiatives to improve work performance and is ready to invest, accompany and implement such innovation without fear of failure and holding in responsibility.

What does this mean to QHPers?

Initiate ideas and initiatives to improve and innovate your work performance without fear of failure, and the Board of Management undertakes that this will not affect the review for your reward or promotion in case of failure.

You will be recognized, commended and considered as a role model of tireless devotion to QH PLUS development.

Take action with the thought “Nothing is impossible”.

The essence of this provision should not be misunderstood as you are allowed to make mistakes or fail over and over again for the same problem.

You will be recognized,
commended and
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development

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6

Maintain safety, health & fight against epidemics



6.1

Working environment that values health and safety

Considering human resource as the most important factor for the Company's long-term success, QH PLUS undertakes to constantly maintain a working environment that facilitates sustainable work improvement and where employees can give their best. Our commitment to health and safety exceeds or equals the level required by law.

Safety and health are our top priority in design and implementation of operating processes and in the way we organize our operations. QH PLUS always tries to reduce or eliminate injuries or accidents at workplace and occupational diseases. The Management Board and managers at all levels are directly responsible for their actions to minimize potential negative impacts on each individual.



What does this mean to QHPers?

Safety is the result of our committed contribution to a healthy and happy working environment.

Always follow safety instructions at your workplace.

Stop working if detecting a risk of occupational accident.

Check if there are any health and safety risks in your work area. Propose how to handle the problem.

For instructions, please contact HR or HSES Department.



6.2

Fighting against Covid 19 & infectious diseases

QH PLUS considers the Covid 19 epidemic as very serious, wreaking heavy impact upon the safety and health of each QHPer and his/her family. The epidemic inflicts many adverse consequences on the business environment and causes many unpredictable social problems. As a result, according to WHO recommendations, Vietnam's Ministry of Health and regulations on epidemic control in line with business and production characteristics of QH PLUS, you are required to strictly and responsibly comply with them to protect your health and the community.



What does this mean to QHPers?

Practice 7K (Face mask - Distance - Disinfection - No gathering - Health declaration - Clean air - Stay healthy) during the epidemic period at anytime, anywhere you work and have social interaction.

Keep doing exercise to improve your health, wash your hands regularly, wear a face mask in public when you are sick under normal conditions to protect your health, your family and the society.

Immediately report to the nearest health agency or HR department if doubting you are sick or at risk of coming into contact with an infected person for prompt medical advice, treatment and care.



A close-up photograph of several hands of different skin tones clasped together in a circular formation, creating a sense of unity and teamwork. The hands are positioned around the central text, with some showing more detail of the fingers and palms. The background is a soft, out-of-focus blue and green, suggesting an outdoor setting with foliage.

7

Protect
the Company
property

7.1

Fraud and abuse of Company property

Stay away from fraud and use of the Company property for activities that might damage your reputation.

We do not tolerate fraud and abuse of the Company property. Fraud is an act intended to deceive the Company into carrying out activities at economic detriment to QH PLUS.

Property, equipment, resources, and funds (except charitable funds) must be used solely for business purposes, not for personal gain.

Examples of property abuse include theft, falsifying expense or time-keeping reports, unauthorized use of the Company's vehicles, computers, phones or facilities, or improper use of employee commission, discount.

What does this mean to QHPers?

Personal expenses such as travel or personal entertainment are not allowed to be considered as business expenses.

The Company's computers must not be used for any illegal activities or for viewing inappropriate documents, including pornographic websites, inflammatory and hateful websites or any other websites that may damage our reputation.

Personal use of the Company's resources such as vehicles, computers, phones, and machinery must be kept at a minimum level.

The Company's computers must not be used for any illegal activities or for viewing inappropriate documents

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7.2

Reporting data in business activities

The integrity in financial, business, production, and construction reports is essential to maintaining the trustworthiness of customers, suppliers and other stakeholders.

Entering data into our software, books or records with the intention of concealing or distorting the true nature of any transaction or entering false information to influence work goals or results is strictly prohibited.

All financial transactions must be kept and recorded in the accounting books according to applicable accounting principles in QH PLUS system and prevailing laws.

What does this mean to QHPers?

Always abide by regulations of QH PLUS when reporting financial transactions, business, production and construction situation.

When reporting, do not misinform the facts and guarantee that the information accurately reflects the reported situation.

Adjust, revise data and immediately report the data correction in case of inadvertent error due to the system's objective failure resulting in confusion.

If you detect or suspect a fraud, report it immediately to the Management Board.



The integrity in financial, business, production, and construction reports is essential to maintaining the trustworthiness of customers, suppliers and other stakeholders



7.3

Intellectual Property

Intellectual property of QH PLUS such as: know-how, ideas, trade secrets, patent registration, trademarks, domain names, designs and management documents are valuable assets to the Company. That value might be lost or detrimental if such assets are misused or disclosed illegally.

Intellectual property is protected not only by application, registration, and renewal, but also by objection, invalidation or copyright infringement lawsuit against third parties.

Any infringement may cause you to pay compensation for damage or be subject to disciplinary action in accordance with the Company's regulations and applicable laws.

What does this mean to QHPers ?

Report to the Management Board if you believe that QH PLUS intellectual property is or may be infringed upon by a third party.

Respect the valid intellectual property of other parties.

Do not join third parties to develop a copyright-related idea or invention.

Note that any intellectual property developed by you while employed by the Company will remain the property of QH PLUS even after your employment has ended.



Intellectual property of QH PLUS such as: know-how, ideas, trade secrets, patent registration, trademarks, domain names, designs and management documents are valuable assets to the Company



A person wearing a dark suit jacket and a light blue shirt is sitting at a wooden desk, typing on a silver laptop. The person's hands are in focus, with fingers resting on the black keys. To the left of the laptop, there is a white sheet of paper with a blue line graph. The background is a bright, out-of-focus indoor space. The number '8' is displayed in a large, orange, serif font in the upper right corner.

8

Protect and use information and data

QH PLUS encourages employees to promote outstanding products & services, but not to disclose or divulge internal and confidential information.

8.1

Confidential information

Information, especially confidential information, about QH PLUS is a valuable asset. Sometimes, employees may know confidential information. Such information may include financial information, trade secrets, prices, sales and profits, strategies and plans, contract information, customer and supplier lists, information about new products or any non-published information about QH PLUS. Confidential information may also consider as internal information depending on the context.

Confidential information about QH PLUS must be carefully protected and processed, and not be shared with third parties or disclosed without permission, unless you have been authorized to do so.

The obligation to protect confidential information shall survive termination of employment. This also applies to information shared with us by our customers, suppliers and business partners.

What does this mean to QHPers?

Ensure that any information you share about QH PLUS is official information already published or issued for business purposes. Be careful not to post any confidential information on social media or discuss confidential or sensitive information at places where you can be overheard by others.

If it is necessary to share confidential information with a third party, ensure to sign Non-Disclosure Agreement before share.

Remember that your obligation to protect confidential information shall survive your termination of employment. It also means that a new employee cannot share confidential information regarding his/ her previous employers

Use your QH PLUS email account or other official communication channels of the Company for all work-related communications. Do not use personal email accounts, social networks or similar means.

8.2

Internal information

As an employee, you may sometimes be exposed to internal information.

When you access to internal information, you are already subject to legal and regulatory liabilities. Insider trading and illegal disclosure of internal information are strictly prohibited.

What does this mean to QHPers?

Seek advice from the Board of Management if you are unsure of whether the information or data you obtain is internal information.

Do not share internal information or other sensitive information related to QH PLUS with any third parties including your relatives.

8.3

Data protection

We respect every one's fundamental rights to protect his/her personal information, regardless of nationality or place of birth. The need to protect personal data is even more important with the expanding online environment where large volumes of information and data are exchanged on an unprecedented scale. Almost everything we do is online, and while we are connected, devices or applications allow personal information to be collected.

Therefore, it is important that we act appropriately to protect our personal data and that we abide by data privacy regulations applied when storing, collecting and using personal data.

What does this mean to QHPers?

Always act with respect and consideration for the privacy of others.

You may only access personal data to the extent necessary for your work.

If you are allowed to access personal data, you are obligated to protect and keep it confidential.



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Always act with respect and consideration for the privacy of others

8.4

Use of information and open data sources

QH PLUS encourages the research and reference to information and data from open sources (information sources permitting use without copyright) in support of works, production and construction activities at the Company.

Taking advantage of open knowledge and experience from humanity is a smart and effective way to improve labor productivity, accumulate knowledge, promote creativity and develop personal capacity of each QHPers. However, we need appropriate and calculated selection and inheritance of information based on the infrastructure and core values of QH PLUS.

What does this mean to QHPers?

You may refer to and use open information and documents for research and application in work, business, production and construction.

Your work results based on open data sources are still recognized, evaluated and rewarded without judgment from the Management Board if your work quality is satisfactory and not in breach of the core values and principles set up by QH PLUS.

Innovation, initiative and improvement from existing ones are also a positive and praiseworthy development process and will be commended and recognized at QH PLUS.

You may refer to and use open information and documents for research and application in work, business, production and construction



9

Care for the environment &
make contribution to a fair
and happy society



9.1

Our living environment

Every employee of QH PLUS plays a role in protecting the environment. By constantly seeking better solutions for product and service improvement aimed at reducing negative impacts on the environment, QH PLUS needs to ensure that our products and services are contributing to a more sustainable society.

What does this mean to QHPers?

Do not take shortcuts and allow any action we deem harmful to the environment. Carefully manage and document our impacts on the environment and comply with law requirements.

Make sure the appropriate environmental permits are in place. Use green and renewable resources, materials such as water, sun, wind, etc.

Reduce travel by using virtual meeting tools, meeting online or by phone.

Do not take
shortcuts and allow
any action we
deem harmful to the
environment

”

9.2

Climate change & necessary action

Climate change is picking up its pace despite governments' efforts to mitigate the causes of greenhouse effect and slow down the process before breakthrough technologies can help human kind balance between the need of modern facilities and ensuring sustainable development for the environment.

With the main business line in construction, QH PLUS needs to study the impacts of climate change, especially, Vietnam is one of countries most seriously affected by climate change. Accordingly, we need appropriate product designs and apply them in production and construction to better adapt construction works to the harsh natural weather for people and property protection purposes.

What does this mean to QHPers?

Properly consider the impacts of climate change on the building designs and products to help them better withstand possible extreme weather events such as floods, intense and lasting rainstorms, high-velocity whirlwinds, etc. which have happened before and are likely to happen in the next decades.

Trade in materials using less fossil fuels and with highest recycling rate.

Think of future generations so that QHPers can have their necessary thoughts and actions today in contribution to building a safe life.

Think of future generations so that QHPers can have their necessary thoughts and actions today in contribution to building a safe life

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9.3

“Vun Goc” Charity Fund is a concrete action in contribution to building a fair & happy society

In the daily life around us, many people have no opportunities or conditions to overcome their difficulties and adversities in life. Each person having “their roots cut off” from the tree of life makes our shade, peace of mind, and happiness a little less, because we and those fates share the same atmosphere, the same future, and walk on the same path of life. Many roots that are withered will make us no longer green. Cultivating the root today is not only a way to help one or many persons, but also help ourselves to be happy in a sustainable future.

With the desire of contributing to a fairer and happier society, “Vun Goc” charity fund has been established to receive donations from QHPers and our partners in order to take practical and concrete actions to alleviate the hardships in life and support the trees of life in need of care to stay green.

What does this mean to QHPers?

Consider charity activities as a meaningful work in contribution to alleviating mishaps in our lives.

Doing charity work regularly not only helps others, but also helps nurture our kindness.

Contribute physical or material resources to “Vun Goc” charity fund within your ability to join hands with QH PLUS in charity programs to help the community. The Company is committed to transparent use, for the right purposes and regularly reporting the fund activities to all QHPers.

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Doing charity work regularly not only helps others, but also helps nurture our kindness.



10

Compliance and responsible behavior

This Code of Conduct applies to all QHPers and directs, handles, and decides on daily activities of QH PLUS.

As an employee, you are supposed to not only read the Code of Conduct in order to understand what are expected from you, but also regularly refer to it as a guide. You are also responsible for knowing, understanding, and complying with any administrative documents of QH PLUS related to your position and work. You can find out more details on policies, rules, regulations, procedures and other important guidelines and documents in the document library in the Group's system in the course of working.

This Code of Conduct cannot cover all situations you may encounter in practice and sometimes it is not clear how to act properly. Whenever you have a question, please seek support.



**If you have any possible concern about this Code of Conduct,
please:**

Discuss such concern with your direct superior as soon as possible.

If you feel uncomfortable doing that, send email to:

gopy@qhplus.com



Visit us at:



www.qhplus.com

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