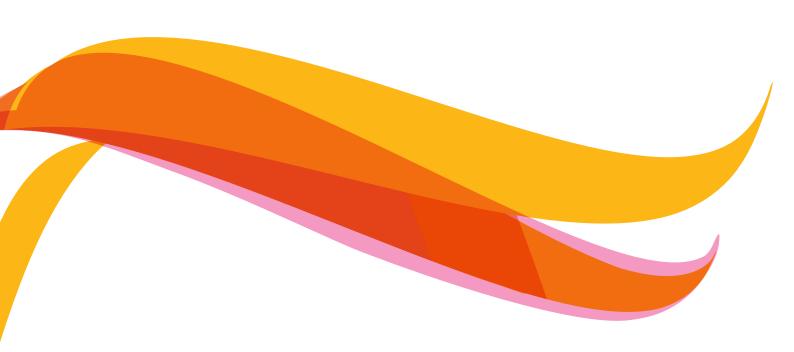




P2P BUSINESS ETHICS POLICY



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P2P Marketing Communications Co., Ltd (referred to as P2P) is a human-centered and driven marketing service company. We run this business for everyone. The core value of P2P is humanity in governance and business. Everyone Matters is an operating philosophy, a guideline in behavior and action. Everyone Matters is built on the H.I.T.I platform: Humanity - Integrity - Teamwork - Innovation.







Integrity



Teamwork



Innovation

We are committed to pursuing and maintaining these 4 values in running the company and conducting our business activities with the company internally, customers, suppliers, and with the community and government where P2P's branches are located.

We are committed to respecting the laws of Vietnam and respecting international principles and standards related to workers, the environment, and the prevention of corruption and bribery as the International Declaration of Human Rights, declaring international trade union statement on fundamental principles and rights at work and the United Nations global treaty. P2P supports the activities of Transparency International

We are committed to preserving and promoting an open and equal work culture for everyone in any position within the company. All employees are valued and inspired to do the best they can.

We are committed to upholding transparency, not giving bribes, and persistently implementing effective anti-corruption measures. We are willing to cooperate with the government, NGOs, customer companies, suppliers, or anyone in the prevention of embezzlement and bribery.

I. THE ANTI-CORRUPTION & BRIBERY POLICY

Corruption in Vietnam is a burning problem and a major concern of the Government and the people. Corruption occurs not only in state management agencies but also within each enterprise. P2P and our partners also inevitably confront this issue.

P2P's anti-corruption policy expresses its stances in this regard as follows:

- 1. Welcoming and complying with relevant contents of Vietnam's Anti-Corruption Law and supporting Transparency International's activities.
- 2. Refusing to provide services with corrupt elements, suggesting or facilitating bribes to individuals or groups to gain favorable conditions, priorities, and preferences in providing services to individuals clients.
- 3. Do not cooperate with, use the service of the supplier with the policy, have the intention or act of giving a bribe to provide the service at an uncompetitive price, or enjoy any preferential conditions.
- 4. All major suppliers must undertake in writing not to suggest, attempt to give bribes, or engage in bribery of any kind. P2P purchase contracts must contain a provision against bribery or corruption.
- 5. Prohibit all acts of bribery or corruption by all employees at all levels and take effective measures so that bribery and corruption cannot exist in P2P and with P2P transactions.
- 6. Carry out customer care and supplier care activities in a transparent manner.

P2P makes every effort to provide services commensurate with the value of the saved budget, contributing to the success of customers.

P2P builds loyalty and gratitude with strategic suppliers for partnering with P2P to best serve the company's customers.

- 7. Regulations on receiving and giving gifts:
 - a. For receiving gifts
 - All employees of the company are not allowed to directly receive any gifts (in cash, in kind) from partners (customers, suppliers, employees) with a value from 1,000,000 VND (One million VND). contract), if it is based on a business relationship handled by you or within the scope of your management.
 - For gifts with a value of less than 1,000,000 VND (one million VND), they are allowed to receive but must be reported by email to the direct management level and co-send the director of the management division to know.

b. For gift-giving: derived from Vietnamese culture, the company allows giving gifts to partners (customers, suppliers, authorities, ..) according to the following principles:

- Only gifts in kind, not in cash

- Gift value: Up to 1,000,000 VND (one million VND)/time

- Offered only on occasions:

• Birthday : Personal gift

• Women's International: Collective donation

• Lunar New Year : Collective gifts

c. Never use gift-giving/receiving as a means to facilitate/disturb the work being handled or managed. Any individual who violates will be handled according to company rules and Labor Law. Gift-giving/supervising procedures according to the company's regulations. In case there is a suggestion of a partner about a gift as a request, it must be immediately reported to the company to reflect the partner's leadership or report to the authorities if necessary.

II. THE EMPLOYEE'S RIGHTS SET OF POLICIES

1. THE NON-FORCED FREE LABOR POLICY

- 1. At P2P all employees voluntarily join the company with the same motivation of "doing together", no P2P employees are forced to work to pay debts, to pay off the contract covenants (except labor contracts), to repay a favor, to be a slave, to exchange a benefit (material, spiritual, status, power) or to avoid a legal obligation, etc... Employee The company can request to terminate the labor contract at any time following the Labor Law.
- 2. Recruiting labor according to demand through transparent procedures to find qualified workers. No employee has to "deposit", pledge documents, or pay bribes to get into the company.

2. THE FREEDOM OF SPEECH/ASSOCIATION AND RELIGION POLICY

- 1. Everyone has the right to freedom of thought, belief, and religion, including the freedom to change his/her belief or religion, and to freely express his/her belief or religion within the limits of public regulations, company, and the laws of Vietnam.
- 2. Everyone has the right to freedom of speech and to express their opinions and contributions to the management of the company; including the freedom to reserve opinions to express to superiors or to a legitimate trade union.

- 3. The Company respects the legal rights of employees to join, form, or not join trade unions, political and professional organizations without fear of retaliation, intimidation, or harassment. The Company facilitates, does not hinder, union membership and collective bargaining independently and freely. The company supports and creates conditions for lawful mass organizations to operate freely.
- 4. Employees have the right to appoint their legal representatives to conduct collective bargaining (if any). The representative for employees is not discriminated against and creates conditions for them to perform their representative role in dialogues and negotiations with the company. We are committed to establishing a constructive dialogue with representatives they have freely chosen.
- 5. The Company guarantees the right to personal freedom and freedom to develop oneself as long as such freedom does not affect the freedom of others and the company. Everyone matters to others and vice versa: Everyone Matters.
- 6. The scope of the right to freedom of association and the right to collective bargaining must be within the framework of the current laws of Vietnam.

3. THE EQUAL, NON-DISCRIMINATORY POLICY

- 1. The company is committed to maintaining a humane culture to treat truly equal and respect each other without any distinction.
- 2. All P2P employees are treated equally in assignment, evaluation, and benefit according to the principle of "doing together". Everyone has the right to equal remuneration for the labor of equal contribution without any discrimination. The value of that labor is determined by the volume, quality, productivity, and cost spent to perform a job. Those who enjoy higher wage income must create commensurately higher labor values.
- 3. All employees are entitled to the same general welfare regimes of the company.
- 4. The company strictly prohibits the acts of factions, factions, bullying, harming others.
- 5. The Company strictly prohibits and appropriately handles all discrimination on the basis of race, class, rank, ethnic origin, locality, creed, age, disability, gender (including gender) third nature), marital status or belonging to a political party or association. The company respects the privacy of employees as long as it does not affect the company's culture, brand, team management environment and State laws.
- 6. All employees are equal before the company's regulations and are protected equally without any discrimination. Everyone is equal in the right to a fair and public hearing by a lawful disciplinary panel.
- 7. Everyone has the right to equal protection against any discrimination in violation of this policy, and against any incitement to such discrimination. Everyone has the right to be protected by trade unions and disciplinary councils by taking effective measures against violations of the rights provided for in this policy.

4. THE PAYING A WELL-LIVING WAGE POLICY

- 1. All employees are entitled to appropriate remuneration to ensure their own and their family's livelihood.
- 2. Salary and remuneration for unskilled workers whose income is at least equal to the minimum wage set by the state or the industry-standard salary if it is higher.
- 3. All employees when officially joining the company will be provided with easy-to-understand written information about salary income and working conditions.
- 4. Discipline by arbitrarily deducting wages will not be accepted but must comply with the order and procedures of the current law of Vietnam.

5. THE WORKING TIME POLICY

- 1. P2P complies with statutory labor time, collective bargaining agreements, and references to appropriate international labor standards.
- 2. The number of working hours is specified in the labor contract and must not exceed 48 hours per week.
- 3. Overtime work is a voluntary agreement of employees with the company. The number of overtime hours worked in a month must be reasonable, taking under all of the following conditions: the extent, frequency, and the number of hours worked by individual workers and the entire workforce. Overtime work will not be applied in place of regular work.
- 4. Employees are allowed to take breaks between working hours, weekly breaks, annual leave, public holidays, personal work, and unpaid leave according to the provisions of the Labor Law.

6. THE OCCUPATIONAL SAFETY POLICY

- 1. The Company is committed to maintaining a workplace free of violence, harassment, intimidation, and other unsafe or destructive conditions due to internal and external threats. The company organizes a professional security team with appropriate measures to ensure the security of employees when necessary, even at the company's marketing sites.
- 2. The company organizes effective fire and explosion prevention measures. Equip fire prevention equipment, organize and train fire prevention teams on-site, implement electrical safety mechanisms and procedures.
- 3. The purchasing department only uses suppliers who meet the conditions for production safety, traffic safety, food safety, and hygiene.
- 4. The staging team for the company's marketing service topics must implement appropriate occupational safety measures.
- 5. Managers at all levels are responsible for implementing appropriate safety measures under the supervision of their immediate managers.

7. THE RIGHTS TO COMPLAIN AND DENOUNCE

- 1. All employees working in P2P have the right to complain and denounce without prejudice, retaliation, or retaliation later.
- 2. Complaints are company employees who believe that some or all of the contents of documents issued by the company are contrary to the provisions of the Law or the actual application is not under the regulations. of the company, and at the same time it infringes upon the legitimate interests of the employee or the employees of the company in general.
- 3. Denunciation is a company employee's reflection of wrongdoing by another individual or department in the company (including corrupt behavior, taking/or giving bribes) and such behavior has been, is, and will violate the company's regulations, the Law, and at the same time infringe upon the interests of the company or other individuals in the company.
- 4. Procedures for receiving and settling complaints and denunciation
 - a. Write an application (or email)
 - Persons who want to complain or denounce must send an application (or email) request according to the form: KNTC/01/P2P to the competent department (as specified in Part III.1)
 - Email addresses of all employees are stored at: https://outlook.office.com/p2pmarketing.com.vn/everyone
 - b. Receive application:
 - The petition recipient must consider the contents of the application. If it is not within its competence, explain and guide the complainant to know.
 - -If the authority is right, check the attached documents and dossiers, if correct, write a receipt of the application according to the form: KNTC/02/P2P or reply to the email confirming receipt of the application.
 - -After receiving the complainant, the receiver must write all the contents in the complaint monitoring book according to the form: KNTC/03/P2P of his/her department.
- 5. Decentralization of settlement of complaints and denunciations
 - a. Employees of any department, the head of that department is responsible for receiving and settling employee complaints first.
 - b. For part-time employees, report the complaint to the direct manager or the Head of Department who is using that employee.

- c. In the case of whistleblowers, the denunciation is 1 level higher than the complaint, namely to the level of indirect manager, Head of Department, Head of Human Resources Department, and Executive Director.
- d. In case the responsible person does not settle (or does not solve it satisfactorily), he has the right to submit a complaint to the Head of the Committee.
- e. If the Head of the Department does not solve it (or does not solve it satisfactorily), the complaint form should be sent to the Head of Human Resources Department.
- f. The company director is the final authority in handling employee complaints.

6. Time to settle

- a. After reviewing the entire content, the application recipient must reply to the settlement time to the complainant.
- b. In case that department can solve it by itself, the response time should not exceed 3 working days.
- c. In case that department cannot solve it by itself but must cooperate in verification, investigation, or consult from other departments, the response time should not exceed 7 working days.

7. Handling complaints and denunciations

- a. Persons competent to handle complaints must be responsible for settling them according to the above settlement time limit.
- b. TIn case it is necessary to have a council to resolve the complaint, the minutes of the meeting of the council must be made according to the form: KNTC/04/P2P.
- c. Information of complainants and denunciators must be kept confidential.
- d. All acts of unfair treatment of complainants and denunciators are strictly prohibited.
- 8. Rights and Responsibilities of complainants and denunciators
 - a. In case the responsible person does not settle (or does not solve it satisfactorily), he has the right to submit a complaint to the Head of the Committee.
 - b. If the Head of the Department does not solve it (or does not solve it satisfactorily), the complaint form should be sent to the Head of Human Resources Department.
 - c. The company director is the final authority in handling employee complaints.
 - d. Complainants and whistleblowers must remain calm, cooperate and trust the company in the spirit of building, protecting solidarity throughout the company.

III. ENVIRONMENTAL POLICY

- 1. P2P complies with the environmental policy of Vietnam's environmental protection law, commits to minimizing environmental impacts caused by the company's activities to prevent pollution, complying with laws and requirements other needs and strive for environmental improvement activities within the company and the community as a whole.
- 2. Implement measures to protect the company's environment:
 - a. The company is committed to providing a safe and hygienic working environment that meets working requirements, privacy for work and personal living needs in the workplace, clean toilets, purified drinking water standard purity.
 - b. The Company strictly prohibits employees from smoking in the workplace. For those who need it, they are only allowed to smoke in designated places.
 - c. The Company performs daily cleaning and requires employees to comply with regulations on hygiene in the workplace and in public places.
 - d. Efficient use of resources such as electricity, paper, gas to minimize the impact on the environment.
 - e. Educate and train people to be aware of environmental protection and safety.
- 3. Respond positively to solutions of the Government and environmental organizations on promoting environmental protection.
- 4. Disseminate the environmental policy to everyone working for the company, including contractors and the community. Priority is given to suppliers and contractors who demonstrate environmental practices and standards.

IV. THE CHILD LABOR POLICY

P2P is committed to complying with the standards set by the international labor organization regarding child labor and complying with the minimum age provisions of the laws and regulations applicable in Vietnam. The company does not employ employees under 18 years old for heavy, hazardous, dangerous jobs, night work or hindering regular school attendance, mental, physical and personality development of children.

V. THE IMPLEMENTATION AND ACTIONS

- 1. Organization of implementation and internal mastery
 - a. The Human Resources Department is responsible for managing the implementation of this policy.
 - b. The union oversees the implementation.
 - c. Promote this policy in company media.
 - d. The organization disseminates this policy to new employees
 - e. The Head of the Department supervises, reminds and exemplifies the correct observance of the policy's contents. Violating employees, the Head of Department is responsible.
 - f. Handle complaints and denunciations following company regulations.
- 2. With customers and suppliers
 - a. Notify in writing (email or in person) to the company's customers and suppliers about the content of these policies.
 - b. The content of the purchase contract needs to have reasonable constraints for these policies to be respected and implemented.
 - c. Comply with customer policies and procedures.
 - d. Coordinate with customers and suppliers on matters related to this policy.

This Policy takes effect from the date of signing.

Ho Chi Minh City, March, 02nd, 2015

CEO

(Signed and sealed)

TRIỆU TÔN PHONG



Mẫu: KNTC/01/P2P

CỘNG HOÀ XÃ HỘI CHỦ NGHĨA VIỆT NAM Độc lập - Tự do - Hạnh phúc -----oOo-----

ĐƠN KHIẾU NẠI/ TỐ CÁO

Kinh gửi:	
Tôi tên:	Năm sinh:
Bộ phận công tác:	
Số điện thoại cá nhân:	
E-mail:	
Tôi xin trình bày nội dun	ng khiếu nại/tố cáo như sau:
Tôi xin cam kết toàn bộ n luật và Quy định của côn	nội dung trên là đúng sự thật và xin chịu trách nhiệm trước Pháp ng ty về nội dung trên.
	ngàythángnăm
	Người làm đơn
	(Ký và ghi rõ họ, tên)



Mẫu: KNTC/02/P2P

CỘNG HOÀ XÃ HỘI CHỦ NGHĨA VIỆT NAM Độc lập - Tự do - Hạnh phúc -----oOo-----

BIÊN NHẬN HỒ SƠ KHIẾU NẠI/ TỐ CÁO

	Hom nay, ngay th	nang	nam,	tại:	
Tôi tên	:				
Chức v	ų:				
Có nhậ	n của ông (bà):				
STT	Tên hồ sơ	Số lượng	Bản chính	Bản sao	Ghi chú

Bên giao

(Ký và ghi rõ họ, tên)

Bên nhận

(Ký và ghi rõ họ, tên)



Mẫu: KNTC/03/P2P

CỘNG HOÀ XÃ HỘI CHỦ NGHĨA VIỆT NAM Độc lập - Tự do - Hạnh phúc ----oOo-----

SỔ THEO DÕI KHIẾU NẠI/ TỐ CÁO

Năm:....

Phòng	; (ban):			
STT	Ngày tháng	Người khiếu nại/ tố cáo	Nội dung khiếu nại/ tố cáo	Ghi chú



Mẫu: KNTC/04/P2P

CỘNG HOÀ XÃ HỘI CHỦ NGHĨA VIỆT NAM Độc lập - Tự do - Hạnh phúc -----oOo-----

BIÊN BẢN HỌP XỬ LÝ KHIẾU NẠI/ TỐ CÁO

Hôm nay, ngày tháng năm tại văn phòng công ty (địa chỉ: 66/4 Bình Lợi, Phường 13, Quận Bình Thạnh, TP HCM) Chúng tôi gồm có: BÊN KHIẾU NẠI, TỐ CÁO:				
ĐẠI	DIỆN CÔNG TY:			
Ông	(bà); Chức vụ:			
I.	Nội dung khiếu nại/tố cáo (Trình bày tóm lược nội dung khiếu nại/tố cáo):			
II.	Đại diện công ty giải thích:			
III.	Hướng giải quyết và kết luận:			
Thư	ký:			
	ký của các bên tham gia:			



CTY TNHH TRUYỀN THÔNG TIẾP THI P2P Số: / QĐ/P2P

Mẫu: KNTC/05/P2P

CỘNG HÒA XÃ HỘI CHỦ NGHĨA VIỆT NAM Độc lập – Tự do – Hạnh phúc ----oOo-----

TP. Hồ Chí Minh, ngày......tháng.....năm.....

BIÊN BẢN HỌP XỬ LÝ KHIẾU NẠI/ TỐ CÁO

QUYẾT ĐỊNH Về việc: Giải quyết khiếu nại/ tố cáo

GIÁM ĐỐC CÔNG TY

- Căn cứ Điều lệ công ty					
- Căn cứ Quy định về xử lý khiếu nại, tố c	áo của Công ty ban hành ngày tháng				
năm					
Căn cứ đơn khiếu nại, tố cáo của ngày tháng năm					
- Căn cứ kết quả cuộc họp ngày tháng					
QUY	ÉT ĐỊNH				
Điều 2:					
Điều 3: Trong thời hạn ngày, kể từ	ừ ngày nhận được quyết định này nếu không nại có quyền khiếu nại đến				
Điều 4: Các ông (bà)	nịu trách nhiệm thi hành quyết định này.				
Nơi nhận:					
- Như Điều 4	GIÁM ĐỐC				
- Lun VT.	(Ký và ghi rõ họ, tên)				

