

1

INTRODUCTION



PTEXIM CORP

INTRODUCTION

01

Purpose of the Code of Ethics and Code of Business

02

Apply the Code of Ethics and a Code of Business

03

Responsibility for enforcement

04

Consequences of non-compliance with the Code

05

Approvals, Amendments, and Waivers



Purpose of the Code of Ethics and Code of Business

1.1



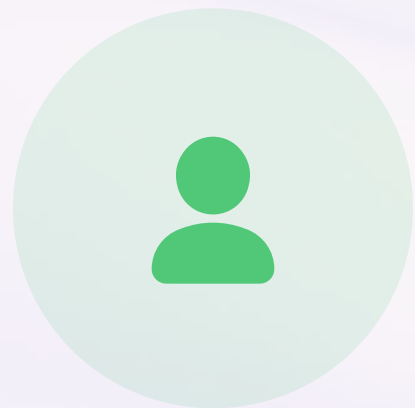
Our Code of Ethics and Code of Business ("Code") are the roadmap that guides us to do business properly. We operate business in the right way when we act ethically and with integrity, our code, our policies, and all applicable laws.



This Code includes provisions about our responsibilities to the community, to each other, and customers, suppliers, and governments

Application of the Code of

1.2 Ethics and Code of Business



This Code applies to PTEXIM CORP and all members of PTEXIM CORP's staff, namely all persons working for or providing services to PTEXIM CORP, including employees, officers, directors, trainees, and non-official employees (including agent employees and independent contractors).



We also expect that our suppliers and suppliers will act ethically, lawfully, and by the standards of our Code and policies. In addition, this Code is required for compliance by certain business partners, such as distributors, retailers, and suppliers who perform services on behalf of PTEXIM CORP.



PTEXIM CORP is a company headquartered in Ho Chi Minh City with personnel mainly in Vietnam and a large number of multinational customers. We comply with the laws of the countries where we do business and all laws of Vietnam applicable on our premises.

1.3 Responsibility For Enforcement

We all need to show our commitment to acting with integrity by acknowledging that we have read, understood, and agreed to abide by the content and goals of the Code. Employees are required to do this when hired and regularly reiterate this commitment. Employees with specific roles and responsibilities may also be required to complete additional certifications, declarations, and training.



Consequences Of Non-Compliance With

1.4 The Code Of Ethics And Business



If the employee fails to comply with the Code, the employee will act outside the scope of his/her responsibilities and may be subject to disciplinary action, including but not limited to warnings, probation with or demotion, or termination of employment contracts. Non-employees of PTEXIM CORP may also be terminated from their contracts or business relations with PTEXIM CORP.

1.5 Approvals, Amendments, And Waivers



Our updated Code has been approved by the Board of Directors of PTEXIM CORP and is effective from January 3, 2023. Any material amendments to the Code of Ethics and Business must be approved by the Board of Directors. A request for a waiver of a provision in the Code for any executive or Board member must be submitted to the Chief Compliance & Ethics Officer and approved in writing by the Board of Directors. If approved, PTEXIM CORP will publicly declare the waiver and the reason for approval.

2

WHAT EVERYONE NEEDS TO DO



PTEXIM CORP

WHAT EVERYONE NEEDS TO DO

01

**Refer to the
Code of
Policies and
Procedures of
PTEXIM CORP**

02

Request Directions

03

**Responsibilities of
managers**

04

Speak up

05

**Privacy and
Personal Data**



Refer To The Code And Policies And Procedures Of PTEXIM CORP

2.1

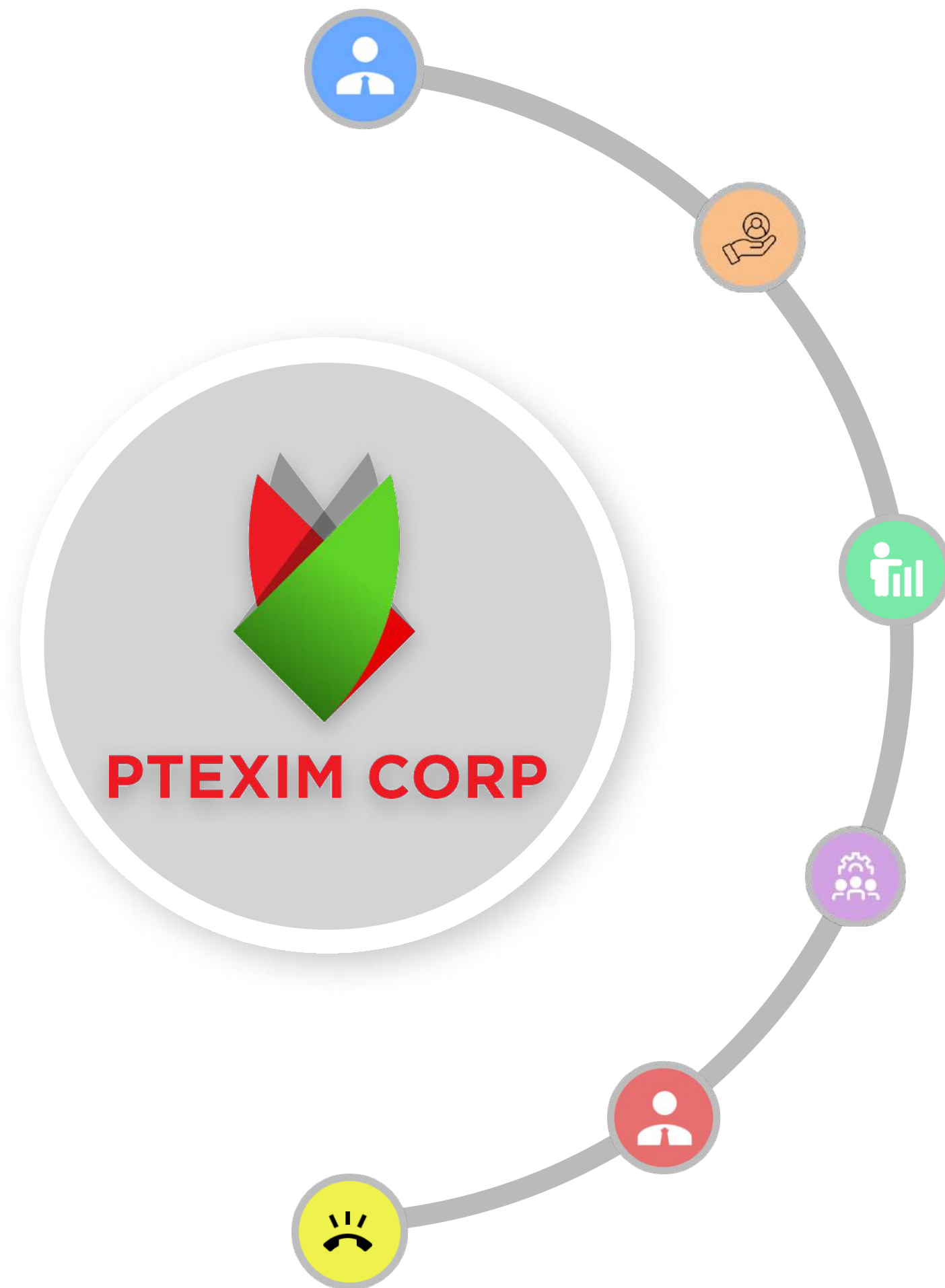


As part of PTEXIM CORP's staff, we must act by the Code, our policies, and the law. Read the Code and consult it regularly. It's a guide on how to succeed.

Complementing the Code are more specific policies and procedures. These additional policies and procedures include our Anti-Corruption Guidance, internal financial controls, disclosure controls and procedures, and others.

2.2 Request Directions

If you're still unsure about a behavior, ask for guidance. You can seek help from any of the following:



Your manager or other members of the management team.



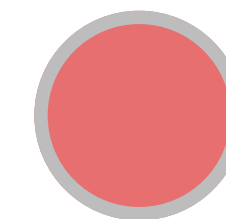
Human resources department or legal department.



Senior finance staff support your business operations.



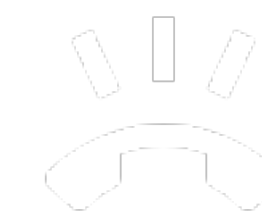
Ethics & Compliance Team at ptexim.com.vn.



Chief Compliance & Ethics Officer of PTEXIM CORP by address.



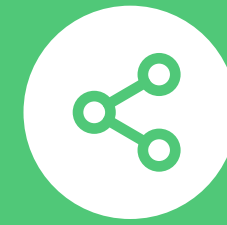
Anonymous line.



2.3

Responsibilities of managers

PTEXIM CORP's managers have a special responsibility to lead with integrity. We rely on our leaders and managers to:



Regularly reinforce the principles of our Code and values at all levels of business.



Promote a culture of ethics and compliance, and ensure team members conduct all ethics and compliance training in a prudent and timely manner.



Immediately notify the Ethics & Compliance Team if a manager receives a report or becomes aware of possible misconduct



Never retaliate or tolerate retaliation against any individual for reporting in good faith.

2.4 Speak up



If you suspect any employee, supplier, supplier, retailer, or distributor of PTEXIM CORP has violated this Code or is behaving illegally or unethically, please speak up.



Immediately raise ethical and compliance concerns and immediately report suspected behavior as unethical, illegal, or suspicious. We also expect you to report any activities that may damage PTEXIM CORP's reputation.



There are many ways to ask questions or raise concerns, and you should use one that you prefer: talk to your manager or another member of management; communicate with HR, Internal Audit, or Ethics & Compliance Teams; or follow the anonymous secure link to report your concerns.





2.4.1

PTEXIM CORP INTEGRITY HELP SECURITY REPORT MAIL PORTAL

The security report mail portal serves all employees of PTEXIM CORP and third parties, 24 hours a day, every day of the year. The Security Reporting Mail Portal is a specialized resource for reporting ethical and compliance concerns or suspected violations of laws or codes.



2.4.2

ANONYMOUS

If you report through the Security Reporting Portal, you can choose to remain anonymous unless local laws in your country of residence prohibit anonymous reporting via the helpline. However, PTEXIM CORP may find it difficult or even impossible to thoroughly investigate anonymous reports. Therefore, we encourage the person reporting to share their identity.



2.4.3

CONFIDENTIALITY

We take reasonable precautions to keep your identity (if disclosed) and the investigation confidential, except where necessary to resolve the issue.



2.4.4

INQUIRE

We take reports very seriously. We investigate the report, decide whether the Code, PTEXIM CORP's policies, or laws have been violated, and take appropriate actions. If there is an investigation into the Code or policy that requires your participation, you must cooperate and answer all questions fully and honestly.



2.4.5

NO RETALIATION

Any retaliation against anyone who raises the issue honestly violates this Code. Raising concerns honestly or participating in an investigation must not be grounds for any actions that are detrimental to employment, including but not limited to divisiveness, demotion, threats, harassment, or discrimination. If you work with someone who has reported a concern or participated in an investigation, you must continue to treat that person with respect. If you believe someone has retaliated against you, report the problem immediately.



2.4.6

ALLEGATIONS OR MISINFORMATION

We will protect all PTEXIM CORP employees who report concerns honestly but will violate the Code by knowingly making false allegations, misleading investigators, or interfering with or refusing to cooperate with PTEXIM CORP's investigation. Honest reporting does not necessarily mean that you have to be right; You just need to believe that the information you provide is accurate.



2.4.7

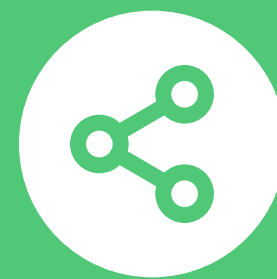
LOCAL LAWS

Comply with the laws of the local, country in which you operate and work.

2.5 Privacy and personal data



PTEXIM CORP is committed to the confidentiality and protection of personally identifiable information (also known as "personal data"). If you have access to personally identifiable information of PTEXIM CORP employees or anyone else we work with, or if you have access to PTEXIM CORP's information retention system, you must comply with all applicable policies and laws regarding collection, use, disclosure, and transmission of personal data.



In general, you should only request personal data when there is a legitimate business need, take steps for proper security, allow access or use only when authorized for a legitimate business need, do not retain data beyond the time that the legitimate business need has ceased, and use a secure method to spend cancel.



Development

You must comply with the data privacy laws of the countries where we do business and PTEXIM CORP's policies when accessing or using personal data.

3

INTEGRITY WITH OUR EMPLOYEES



PTEXIM CORP

INTEGRITY WITH OUR EMPLOYEES

01

**Inclusivity,
diversity and a
healthy work
environment**

02

**Harassment-free
workplaces and
bullying**

03

**Workplaces free of
violence**

04

Health and safety

05

**Substance-free and
alcohol-free
workplaces**

06

Human rights



3.1 Inclusivity, Diversity And A Healthy Work Environment

01

At PTEXIM CORP, we are committed to fostering a culture that promotes inclusion and diversity. This ensures that our employees, customers, and suppliers feel valued and treated fairly and respectfully.



02

We maintain the rules governing employee behavior in our Global Employee Rules, which apply to all employees to implement these principles. We pride ourselves on creating a healthy and productive work environment free from discrimination and harassment based on race, color, religion, sex, gender identity, sexual orientation, marital status, veteran status, age, national origin, nationality, ancestry, physical or mental disability, pregnancy status, health status, and any other characteristics protected by law.

03

For applicants and employees with disabilities, we also make reasonable accommodations by applicable laws and regulations. Each of us must do our part to create a healthy and productive work environment for everyone. This includes reporting to management when you believe certain conditions are biased in a good work environment.



3.2 Harassment-Free Workplaces And Bullying

All employees of PTEXIM CORP have the right not to be bullied and harassed. Harassment includes unwelcome words, images, physical contact, and behaviors of any kind that create a threatening, offensive, or hostile work environment. Bullying is a form of workplace harassment characterized by constant and repeated negative behavior directed at another individual that creates health and safety risks. All harassment is strictly prohibited. We must never act to harass or make colleagues feel uncomfortable in their work environment.



3.3 Workplaces Free Of Violence



01

We have zero tolerance for workplace violence. All of us – as well as guests, business partners, vendors, and anyone else on PTEXIM CORP's premises – are prohibited from engaging in any action that may make another individual feel threatened or unsafe.

02

This includes verbal assault and threats and any hostility, intimidation, or aggression. We prohibit firearms in the workplace, including in parking lots and premises of PTEXIM CORP, to the maximum extent permitted by law.

03



However, this prohibition does not apply to law enforcement, protection of PTEXIM CORP, or government agencies.

Health And Safety

3.4



All employees of PTEXIM CORP are expected to perform their jobs in compliance with laws, regulations, policies, and procedures regarding health and safety in their workplaces.



Always be vigilant and apply safe working practices when you are not working in the PTEXIM CORP office or working from home. When working at a client's site, you must also comply with customer health and safety requirements. Immediately report instances of injury, illness, or unsafe conditions in the workplace, including conditions that are likely to lead to injury or illness.

3.5 Substance-Free And Alcohol-Free Workplaces



Moderate legal alcohol use and caution in legitimate business hospitality can be an appropriate way to socialize. However, alcohol, illicit drugs, and controlled substances can adversely affect safety, productivity, attitude, reliability, and judgment. Except for legitimate business hospitality, we should not use or get drunk. We must never possess, distribute, or take illegal drugs or controlled substances while working or participating in PTEXIM CORP's business.

3.6 Human Rights

PTEXIM CORP is committed to realizing globally recognized human rights and workers' rights. PTEXIM CORP expects all employees, suppliers, and suppliers to conduct ethical business practices, including carrying out activities free from human trafficking, forced labor, and child labor.



4

INTEGRITY WITH OUR SHAREHOLDERS



PTEXIM CORP

INTEGRITY WITH OUR SHAREHOLDERS

01

Integrity in financial statements, business records, and regulatory records

02

Avoid conflicts of interest

03

Personal relations

04

Preventing theft and fraud

05

Responsibilities of employees when traveling for business and leisure

06

Use and protection of PTEXIM CORP's assets and confidential information

07

Efficient record management and document retention

08

Speaking on behalf of PTEXIM CORP

4.1

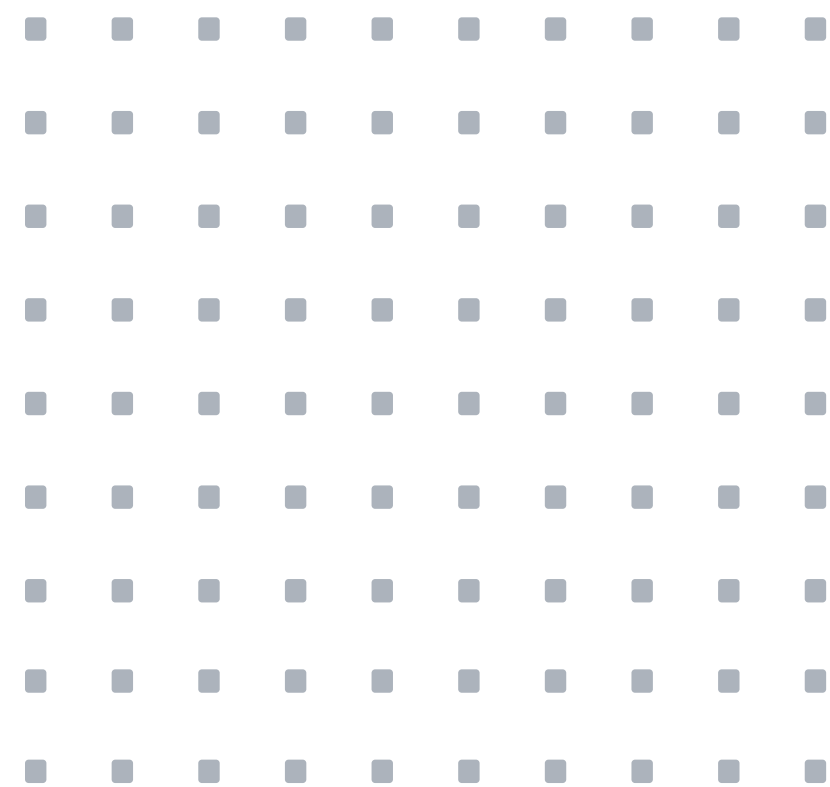
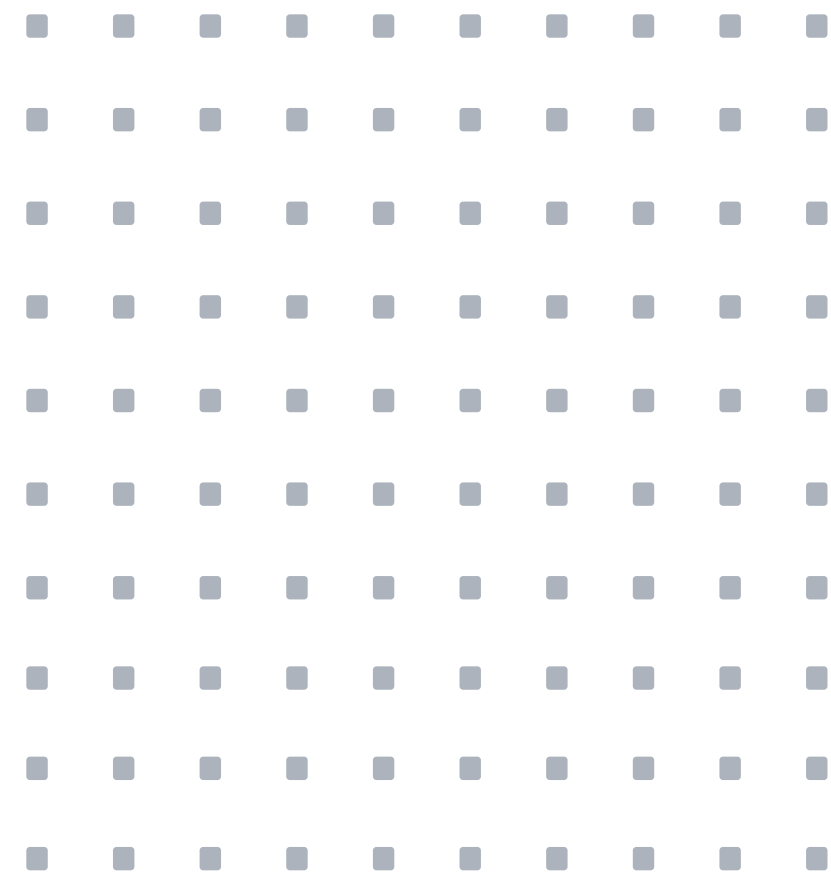
Integrity in financial statements, business records and regulatory records

We must ensure the accuracy of all our business and financial records. This includes financial accounts as well as time records, expense reports, benefit claim forms, and resumes. Our corporate and business records must be complete, honest, accurate, timely, and understandable.





To ensure integrity in our public records and information, we must:



- Record business transactions, estimates, and accruals honestly, promptly, in appropriate accounts and departments, and with appropriate supporting documentation.
- Basic and cumulative estimates based on our best business assessment.
- Comply with our internal controls and take responsibility for our entries, including cooperation with finance and internal audit departments.
- Reports for all government agencies must be complete, truthful, accurate, timely, and understandable.
- Do not delay or accelerate the recognition of revenue or expenses to meet budget targets or targets.
- Appropriately record and maintain all cash or other assets (i.e., no funds that remain unrecorded or left "off the books" for any purpose)
- Manage records in compliance with the Document Retention Policy.



1

Never misrepresent financial performance or intentionally infringe on the integrity of PTEXIM CORP's financial statements. Do not enter information into PTEXIM CORP's books or records that deliberately conceal, misrepresent, or disguise the true nature of any financial or non-financial transaction, what result or balance.

2

If you know or suspect that our public information is incomplete, fair, accurate, timely, or understandable, or that a transaction or development activity may need to be disclosed, please report the matter immediately to your supervisor, manager, or member of the internal audit department, through confidential mail.



4.2

Avoid conflicts of interest

Our conflict of interest policy is simple: We must all be loyal to PTEXIM CORP and always act in our best interests. Conflicts of interest exist when your interests (i.e., your activities, investments, or relationships) interfere with your ability to act in PTEXIM CORP's best interests. Each of us should avoid the conflict between PTEXIM CORP's interests and interests.

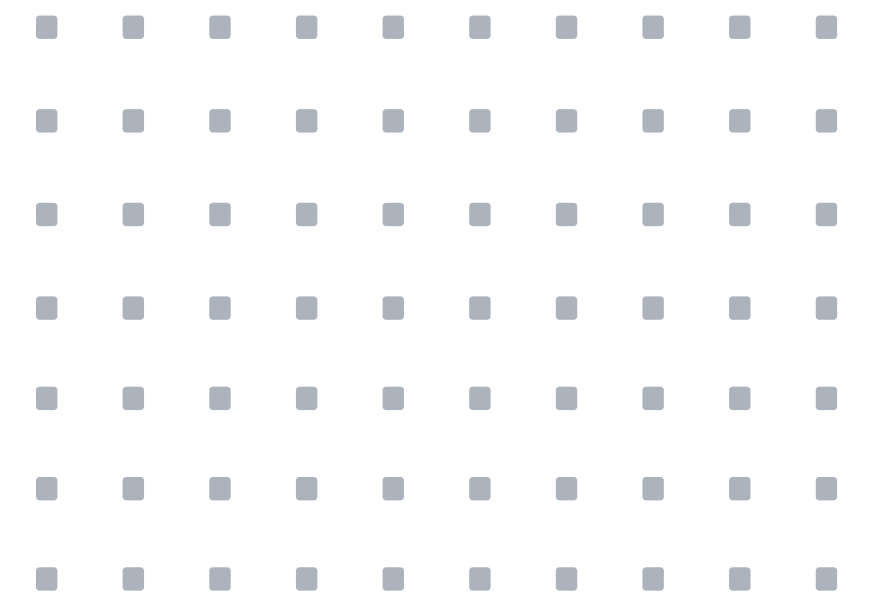
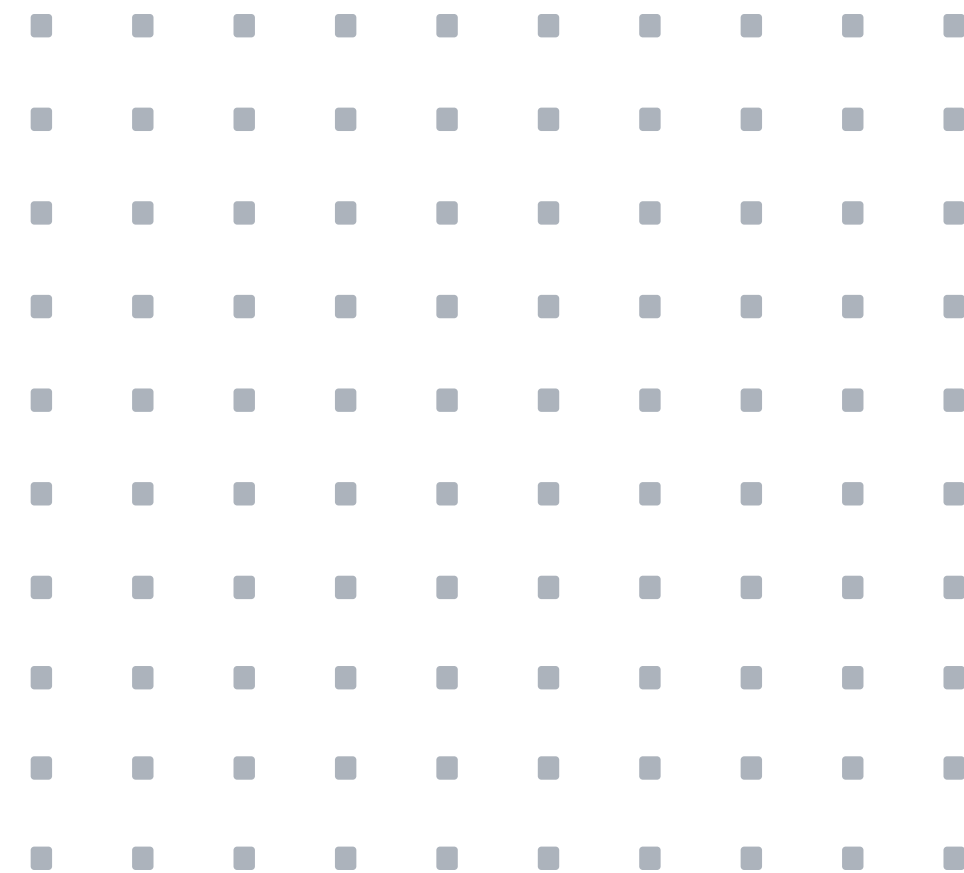
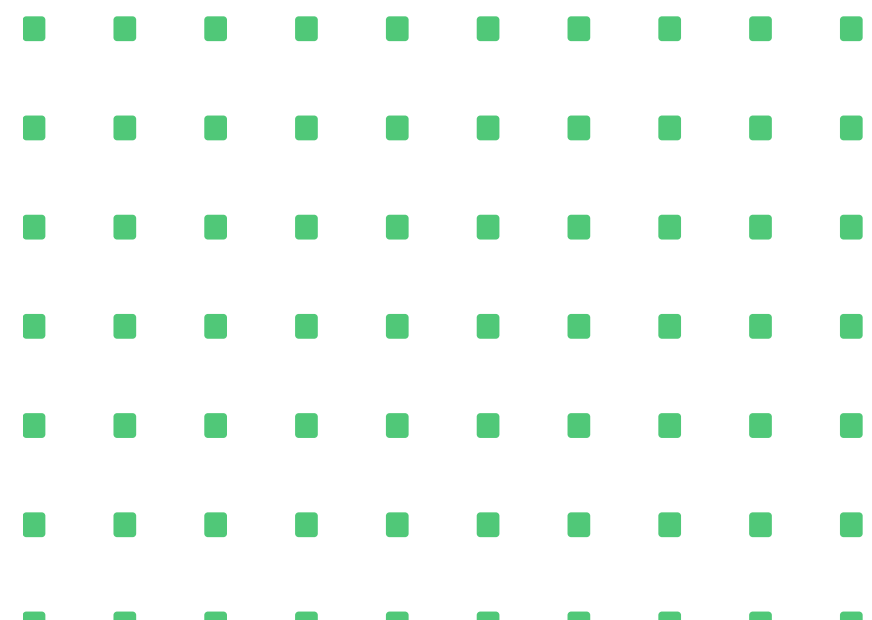


4.3

Personal relations

If one of your family members or someone with whom you have an important personal relationship also works at PTEXIM CORP or is a customer, supplier, or partner of PTEXIM CORP, please ensure that all your actions and decisions are made in the best interests of PTEXIM CORP and not for personal or family relationships your.

You may not be involved in any decision regarding employment involving a family member or with whom you have a close personal relationship.



4.4 Preventing theft and fraud

01

Theft and fraud are offenses and will not be tolerated. Theft is taking something that doesn't belong to you without permission. It may include obtaining material things such as money or property or can be done through other forms such as forgery, embezzlement, and fraud.

02

Fraud is a form of theft by fraud. This includes getting someone to believe something that isn't right, to get that person to act in a certain way.

03

When employees steal or commit fraud, this behavior damages our reputation and brand and harms us in different ways.

04



We all have a responsibility to help protect PTEXIM CORP's assets and reputation by tracking any kind of fraudulent activity against PTEXIM CORP, our employees, customers, shareholders, business partners, or other stakeholders. You should immediately report any suspicious activity.

Responsibilities Of Employees When Traveling For Business And Leisure

4.5



We are responsible for honestly recording and reporting expenses, whether in the business expense system or any other corporate records and systems.



Requires us to maintain financial records that fairly reflect PTEXIM CORP's transactions in a detailed and reasonable manner. When traveling for business or engaging in business hospitality, we should carefully adhere to applicable policies and this Code.

4.6

Use And Protection Of PTEXIM CORP's Assets And Confidential Information

To do your job, you will be given access to many PTEXIM CORP assets, including physical assets, such as our facilities, equipment, and technology resources. These assets also include intangible assets, such as our information, intellectual property (copyrights, trademarks, and trade secrets), your trademark, reputation as well as inventions developed in the course of your work or related to existing or anticipated products of PTEXIM CORP. protect these assets from damage, loss, misuse, unauthorized disclosure, and security threats.



4.7

Efficient record management and document retention

We must follow appropriate procedures governing record keeping and disposal by applicable laws, regulations, and policies of PTEXIM CORP.



4.8 Speaking On Behalf Of PTEXIM CORP

When one of us is allowed to speak on behalf of PTEXIM CORP, we must always take PTEXIM CORP's reputation seriously, speak honestly, discuss only non-confidential information, and follow PTEXIM CORP's communication guidelines.



5

INTEGRITY WITH OUR
CUSTOMERS, PARTNERS, AND
COMMUNITY



PTEXIM CORP

INTEGRITY WITH OUR CUSTOMERS, PARTNERS, AND COMMUNITY

01
Treat our
customers
fairly

02
Protection of
information and
intellectual property
rights of others

03
Fair competition

04
Prevent bribery
and corruption

05
Compliance with international
trade controls, trade
sanctions, and other global
trade regulations

06
Communicate
responsibly

07
Environmental
management and
community investment



5.1 Treat Our Customers Fairly

Integrity in the marketplace requires each of us to treat our customers ethically, fairly, and in compliance with all applicable laws. When dealing with PTEXIM CORP's clients, we always need to:

01

Introduce our services and products honestly.

02

Avoid unfair or deceptive business practices.

03

Communicate our sales programs

04

Fulfill our promises.

Our contracts with our clients should always reflect the importance and value we place on their business. All customer sales agreements must be in writing and comply with our policies.

Protection Of Information And Intellectual Property Rights Of Others 5.2



Many of our customers are business leaders. To do this, they often share their confidential information with us so that we can provide the best possible service.



We have a responsibility to protect the confidential information of our partners and customers with the same care as we apply to our information.

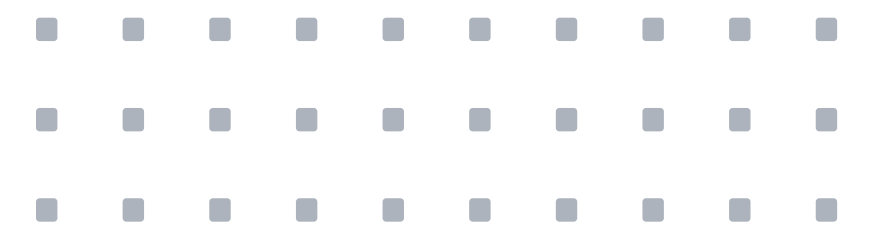
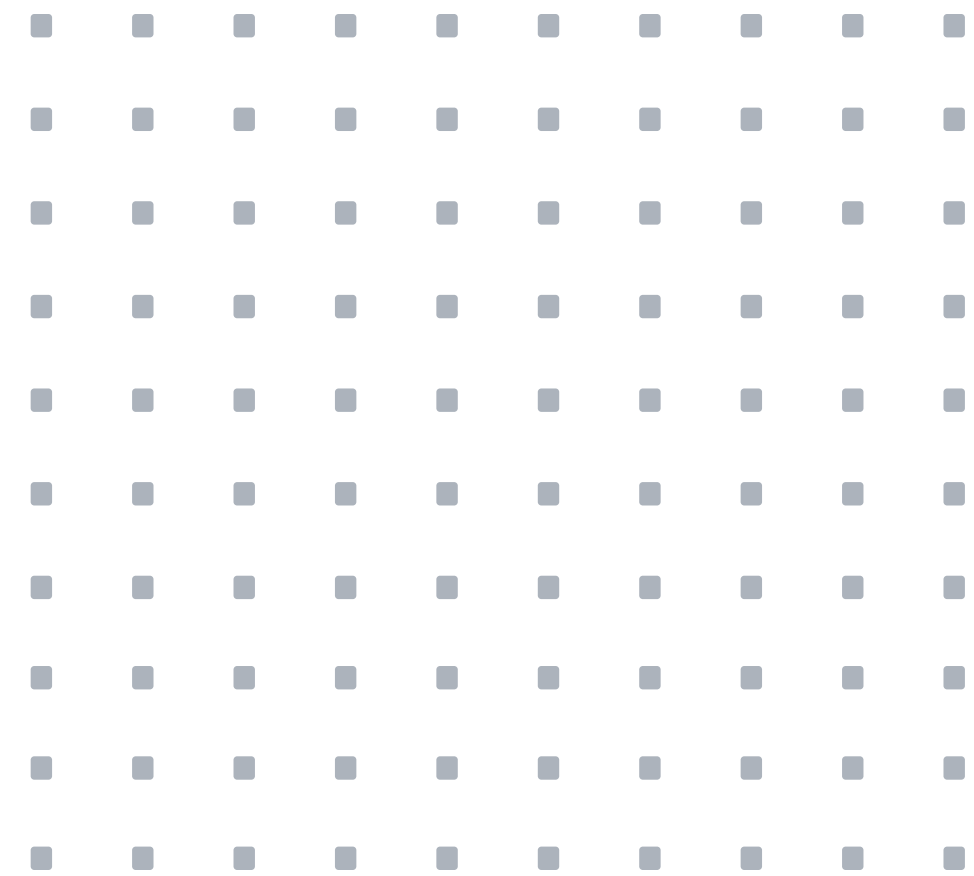


5.3

Fair competition

In all regions and countries where PTEXIM CORP does related business, we compete healthily but fairly, honestly, and with integrity, in compliance with all applicable laws.

Competition law, sometimes called antitrust law, prohibits companies and individuals from interfering with free market forces through illegal agreements or other unreasonable restrictions on competition.





5.4

Prevent bribery and corruption

PTEXIM CORP believes in conducting business with the highest level of integrity. We do not tolerate our employees or any third party acting on our behalf to give or receive bribes to influence the outcome or receive favorable treatment.

Even if bribery and corruption are a common way of doing business in a particular country or region, that is not PTEXIM CORP's way of conducting business.

5.5 Compliance With International Trade Controls, Trade Sanctions, And Other Global Trade Regulations

01

As a company serving customers worldwide, we have a responsibility to ensure that our cross-border operations and the transfer of our products, data, and services comply with a variety of export controls, economic sanctions, import requirements, restrictions, Customs laws, and regulations comply with trade and other product regulations. Export controls and other international trade regulations that may restrict or prohibit the transfer of our products and technology to certain organizations and individuals, such as terrorism and drug trafficking; countries such as Cuba, Iran, North Korea, South Sudan, Sudan, and Syria; or areas such as the Crimea/Sevastopol region of Ukraine.



03

For remittances to many other countries, we must obtain prior written approval from government regulators to ensure the legal transfer of certain regulated products.



5.6 Communicate Responsibly

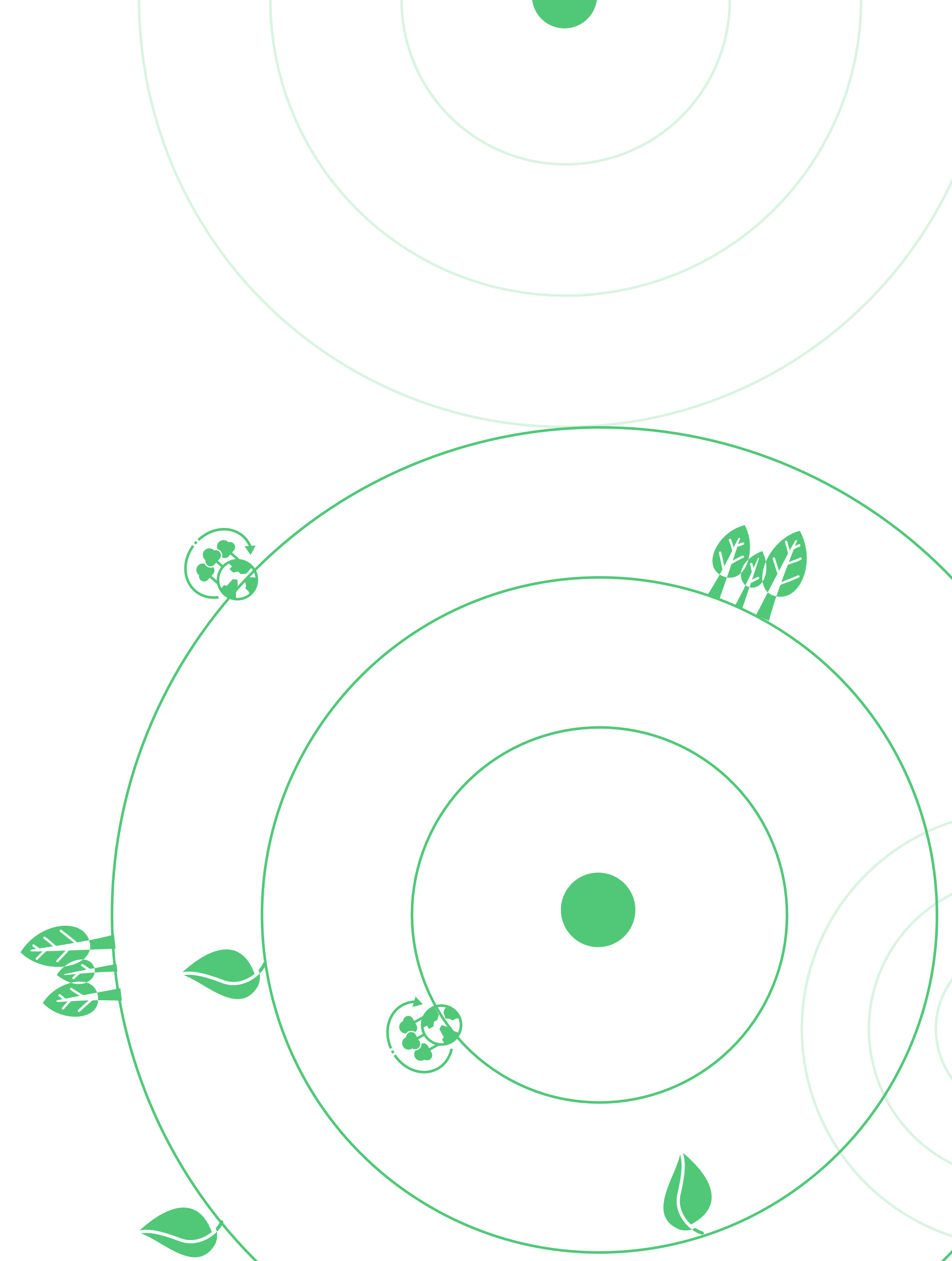


When you speak up on public matters or in a public forum, you do so in an individual capacity and you should not mislead that you are speaking or acting on behalf of PTEXIM CORP unless you have prior permission to do so.

5.7

Environmental management and community investment

Our environmental policy establishes compliance with applicable environmental laws and regulations as a minimum operating standard for our operations globally. In addition, we proactively work to reduce your environmental impact and leverage our influence to join others to reduce your industry's environmental impact. We all have the responsibility and capacity to conserve resources and ensure environmental protection.





CODE OF ETHICS AND BUSINESS

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