

PTEXIM's Commitment to Our Employees, Consumers & Business Partners



CODE OF CONDUCT

A MESSAGE FROM LEADERSHIP

In the context of global integration increase **fast & faster**, Vietnam country having been faced many opportunities and challenges of commodity sectors developing. In order to improve competing capability and maximize advantages in a fairness and equality market, all of Vietnamese Enterprises needed to complete their activities; un-ceasing improve quality of their product and their service. These are vital conditions that determine sustainable survival of an Enterprise.

We all accompany together with **PTEXIM Corp** under a mission of adding more worthy for our Customer/Partners/Self/Family, we need to contribute and make efforts; we have supplied many Vietnamese **high-quality** Agricultural Products into international market through our business; Operating Principle of PTEXIM Corp. is proper balance the benefit of all parties' base on Corporate Social Responsibility (**CSR**).

As the **Founders** of PTEXIM Corp we would like to proceed all of projects quickly; create more and more worthy marks of Vietnamese Agricultural Products into map of World Agriculture; we will always and forever put advantage (material - mental included) of Customer/Partners/ All Staffs of PTEXIM Corp. on the first; we declare to do our best for developing PTEXIM Corp.; we hope that all Colleague of PTEXIM Corp. will accompany together for a Prosperous PTEXIM Corp.

Please kindly be given our deep fullness respect and grateful to all of PTEXIM Employees who have been accompanying together to pursue our common career.

The Founders

CORE VALUES AND MISSION



In addition to the above core values, **PTEXIM** aims to and build the following principles in awareness and action:



ACTION

Do not just read, know and understand the Code of Conduct but seriously take and put the theory into action



ETHICS

Honesty, integrity, integrity, ethics in business and life



KNOWLEDGE

Constantly learning, cultivating and contributing talents to the Company's success



RESPECT

Build all relationships on the principle of respect for yourself, respect for others



RESPONSIBILITY

Take responsibility for the results of your actions



MISSION

PTEXIM is committed to providing international quality products at competitive prices, for the public health by our reputation and responsibility to people and society



VISION

Becoming a **leading exporter** of agricultural products in terms of scale, efficiency; contributing to enhancing Vietnamese brand name in the international market. With the philosophy of respecting and preserving what belongs to nature, **PTEXIM** always aims to provide natural, pure and healthy products. We constantly explore and apply **advanced technology solutions**, search and develop raw material areas to bring the best products

3.

Object and Scope of application

This Code of Conduct is applied throughout the Company, including Company's Office, factories and affiliated factories.

All employees of PTEXIM in all kind of position such as operators, managers and staffs are responsible and obligated to comply with the Code of Conduct.

We have endeavored to communicate and expected in suppliers, customers and third parties/Agents/ Partners that invest a certain respect for the Code of Conduct



COMPANY TO STAFF



INTERNAL CODE OF CONDUCT

- FAIR
- RESPECT
- DYNAMIC
- ENSURE BENEFITS

FAIR

Firstly, PTEXIM treats all employees fairly. Fairness in assessing capacity, dividing obligations, rights for each individual. The regulations about hiring, job placement, determination of salary, bonuses and other benefits are compiled actual basis accordingly.

Secondly, we strive to build a fair competitive environment. We can't develop without any competition and that competition need effective, justly and be expressed capacity of each individual or organization.

It should be none of discrimination and harassment in human race/color/religion/gender/ pregnancy /ethnic origin/age/disability/social grade or any protected by law characteristics at PTEXIM Corp

RESPECT

PTEXIM always respects all Employees' individual rights, dignity, kindness or honest; Each Staffs have their own identity and personality, PTEXIM have not only respected these disparities but also realized and rewarded any positive advice that got Company rich without discriminate position, division.

Besides that, PTEXIM also has an opened-mode in providing internal information related Employees' job, relationships, and achievements. Especially, PTEXIM respects Employees' privacy. Any researching, collecting, storing and using Employees' information shall be conducted in

DYNAMIC

All employees also have opportunities to exploit and express their highest abilities; strive forward to develop themselves and dedicate their efforts for company success

In addition, PTEXIM has enhanced openness in working space by create conditions for exchanges between staffs and managers, between staffs and staffs; thereby, on the basis of respecting each other employees can do their work better. It is importance to balance your private life and your job; PTEXIM understood that and always highest-support employees (If any)

ENSURE

Firstly, protecting the health and safety of employees is one of PTEXIM's core values. Through management leadership and employee cooperation, Company pledges to providing a safe, comfortable workplace. All of us, especially the worker who is directly working in the production process line, are responsible to comply principles, regulations of law, and strictly implementing safeguards related to protect yourself, colleagues and customer safety and healthy.

Secondly, PTEXIM depend on achievements of each employee to Company that recognized their efforts and rewards them fairly, worthily



INTERNAL CODE OF CONDUCT

- COMPLIANCE
- FOR THE BENEFITS OF THE COMPANY
- PROTECT
- SECURITY

COMPLIANCE

Each employee of PTEXIM has responsibility to comply rules, regulations, internal policies of the Company and laws, included but un-limited, expressed in this set of rules content and values. Each Employees must equip the knowledge of rules, regulations, instructions, instructions for use and proper actions within the scope of their responsibility and implement these best in their ability

Unless specifically authorized, it is un-permitted for any PTEXIM employee to work as an official staff or collaborate with other company (3th parties), especially company of customer

FOR THE BENEFITS OF THE COMPANY

Firstly, it is impossible to use assets, information of Company for competing or taking away company's opportunities in order to give benefits to individuals, family, relative by employee directly or in-directly.

Secondly, we must be absolutely careful in the business of buying and selling goods, products or services from PTEXIM with suppliers or customers to avoid conflicts of existing, potential or identifiable interests. Please note that PTEXIM opposes employee receiving benefit from customers and suppliers

Thirdly, employees cannot perform work or deal with customer or supplier of PTEXIM as an operator, agent, trustee, authorized or work as a representative of them while these relationships may cause conflict of identifiable interests with Company. PTEXIM in specific cases will assess to determine whether it is appropriate or inappropriate when employees are commissioned / assigned to the positions with the above roles / roles

PROTECT

All employees are responsible for protecting PTEXIM's assets from damage, loss or misuse and other improper uses, especially when such assets are delivered for staff to manage or use.

Company assets are invested and equipped for the purpose of serving the business of PTEXIM, employees must not use those assets for personal purposes.

Only a few senior executives or managers have the right to decide matters related to Company assets, employees should not make any decisions unless approved by the competent authority. If you need to know which level has the authority to make decisions regarding Property matters, contact your supervisor or the Division of Administrative Organization

Currently, in an extremely competitive environment, information security is very important. Every employee at PTEXIM must be aware of the importance of the confidential information they hold. Employees are not allowed to disclose information nor allow any third party to violate the Company's confidential information.

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Firstly, employees are required to comply with the regulations on collecting, using, transferring, deleting, and protecting information with different levels of security. Information that employees are aware of implementing the Privacy Policy includes but is not limited to:

- Information on governance and restructuring;
- Annual, medium and long-term plans;
- Information relating to the proceedings;
- Business and marketing plans;
- Analysis of competition and risks;
- Product development plan, product formula;
- Prices, cost, budgets;
- Important contracts, mergers or acquisitions;
- Business and financial plans or forecasts;
- Current and potential transactions, unfulfilled contracts, unpublished interests;
- New products not yet announced;
- Salary information, financial data and research results have not been made public, as well as non-public information that may be used by competitors or be harmful to PTEXIM or its customers if such information published;
- Information on Staff;
- Exclusive information includes intellectual property rights such as trade secrets, patents, trademarks and copyrights, as well as business plans, technical and production ideas, designs, databases. and records;

2

Secondly, staff must take all appropriate measures to optimize the value and maintain the confidentiality of those assets



With intellectual property: PTEXIM's intellectual property includes, but is not limited to business ideas, information and business secrets, PTEXIM protects intellectual property rights through registration protect inventions, trademarks and copyrights. Each employee is required to provide absolute protection of these intellectual property.

With PTEXIM information system: including but not limited to email-related contents, intranet systems, software, telephone, voice mailbox, wireless devices, internet access, fax, personal computers kernel, other storage devices.



E-mail

PTEXIM related Staff will be provided with an e-mail account in the Company's e-mail system. Employees are only allowed to use the issued account, e-mail system to exchange information for the Company's business purposes. Other external e-mail systems as well as forums (boards, forums) are not allowed to be used to exchange information for the Company's business.



Network system and network accessing right

Employees are only allowed to access and use information per assigned tasks. In exceptional cases, the employees must take approval of the authoritative management and IT department. Unauthorized access and use will be considered as an infringement action to company assets.



Software: PTEXIM's opinion is to use legally licensed software only. The individual software can only be used at the company if getting approval of the authoritative management and IT department. This software must be certified about copyright before installed. All employees are responsible for

3

Thirdly, the staffs must:

Use assets – information systems suitably to ensure that information is achieved promptly as well as being responsible for protecting network systems and data from improper accessing actions, damage or theft. The information system usage and protection are regulated specifically by the IT department.

Access and use PTEXIM's information system will be controlled and the information will not be private when they are sent/ received/ saved in the company system. So the information can be prevented or considered by the company in case of necessity.

Always do in the way that protects and enhances the company's reputation and brand.

Use good and careful judgment when talking about the enterprise or colleagues, even when not be at work



4

Fourthly, the employees must not:

- Talk behind or give adverse information to the media or members of the investment enterprise community.
- Use social media (such as Facebook, Twitter, Blog, Instagram, Linkedin,...) to post or display vulgar, pornographic, threatening, harassing, defamatory or discriminatory information about the company, colleagues as well as related parties.
- Participate in social media forums for business purposes without the company's permission by writing in advance.
- Discuss loudly in an open space where a third party can hear and realize information.
- Discuss confidential information with third parties without permission or even agreement/commitment not to reveal the information.
- Discuss with the partners, customers, and suppliers without proper approval and understanding about whether information status is confidential or not.
- Improperly delete notes or documents containing confidential information.
- None of the employees is allowed to freely contact the Press, answer interviews on behalf of PTEXIM without legal authorization from the company unless that statement is as an individual statement that does not show that that person is doing on behalf of or related to PTEXIM.
- Provide any service to competitors or potential competitors.
- Carry out activities that can make harm to images, label, trademarks, and prestige of PTEXIM:
 - Reveal confidential information of PTEXIM to other parties without authorization or permission.
 - Do fraud, scam and vandalism and other illegal activities.
 - Access websites, save/ release files/programs containing content relating to violating the law such as pornography; harassment; politics agitation; religions division.
 - Harass others.
 - Send spam mails, viruses or harmful scripts.
 - Use someone else's account without the permission of the account holder.
 - Carry out testing IT system actions without the official approval of PTEXIM's authoritative person.
 - Allow an unauthorized person to access the information system.

GUIDANCE AND ENCOURAGEMENT

Managers have to have solutions to ensure that subordinate employees are aware of the work and responsibility of every individual that be affected by the Code of Conduct and other rules, policies and regulations of PTEXIM. Specifically, management has to know to make the opportunities to discuss the Code of Conduct, as well as settle a comfortable environment where each employee can present their questions or concerns.

As a result, the group's members feel braver, more confident, and can show ethical concerns. Basing on that, we will ensure that all ethical concerns mentioned are appreciated and followed.

In some cases, managers need to use experience and good judgment to release the ethical decision basing on the principles contained in this Code. If the employees have to face an awkward situation and uncertain about how to handle the situation, they should ask for help

EXEMPLARINESS

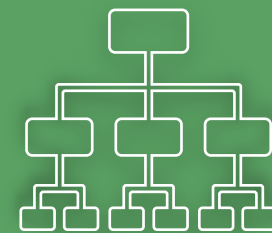
Being a leader, management is obliged to be exemplary and do at first. Management must be self-aware, do ethical behavior, treat in business and life as well as comply with the laws and regulations. Thanks to that, they can inspect and require their employees not to violate the Code of Conduct.

Management should not encourage, imply, or command directly employees to exchange ethical values to achieve a certain purpose

CARE

Give attention to employees when receiving feedback on work, personal issues as well as the Code of Conduct or any other ethical questions. Clarify the received information and respond as soon as possible.

Be who answers questions, the management is not responsible for answering immediately or answering all issues, do seeking help from a higher direct management one if there is no satisfactory answer



MANAGEMENT
TO EMPLOYEES



STAFF TO STAFF



INTERNAL CODE OF CONDUCT

- FRIENDLINESS
- SOLIDARITY
- CONFLICTS SOLUTION

FRIENDLINESS

Build an open-mind, friendly and sociable working environment to help every employee's spirit to be always happy, excited, enthusiastic and devoted at their best. Colleagues have to be close, interested and share, support each other in work and life

SOLIDARITY

PTEXIM is a big family always standing together to overcome difficulties. None of the individuals or organizations is allowed to take actions that defame, talk behind and divide solidarity spirit

CONFLICTS SOLUTION

Personal conflicts which are related to the benefits will increase when employees have to face choosing between personal's benefits and the company's. Benefit conflicts can impact the integrity of the company. Accordingly, all employees are required to act for the best benefit of the company. The employees who are doubted objectively due to personal or family or private relationship benefit should refer the manager's opinion. Should avoid influenced relationships or activities which can reduce your ability to make fair and objective decisions in your work. If we think there are occurred or coming benefits conflicts, we must inform that to the authoritative manager

CODE OF CONDUCT AT EXTERNAL ENVIRONMENT

- 1 TO CUSTOMERS AND PARTNERS
- 2 TO SUPPLIERS
- 3 TO SHAREHOLDERS
- 4 TO CONSUMERS
- 5 TO THE GOVERNMENT, THE LAW
- 6 TO THE ENVIRONMENT
- 7 TO COMMUNITY ACTIVITIES



TO CUSTOMERS AND

PARTNERS



FAIRNESS AND INTEGRITY

PTEXIM treats with fairness and integrity to all of customers and suppliers.

CUSTOMER SATISFACTION

We aim to build and maintain customer satisfaction at maximum level through our commitment in order to improve quality, delivery, flexibility and reliability

RESPECT

PTEXIM respects the confidentiality of sensitive commercial information provided and we only use this information appropriately for legitimate business purposes

MUTUAL BENEFITS

Build a mutually beneficial relationship at every transaction value and period of the partnership

When seeking new partners, PTEXIM conducts to verify thoroughly about their quality, prestige and integrity in the market. We choose suppliers and partners that have the core value and commit to doing ethical business treatment which is suitable with our values and standards.

We oppose all forms of children labor use or children's development pretention doings. We believe the employment must be freely chosen and commit not to using any form of forced or involuntary labor.

Employees are responsible for notifying clearly and honestly to customers, partners, but being cautious to protect intellectual property rights and not revealing confidential information unless being permitted; ensure that all notifications about products, services, contract negotiations with customers are accurate and true; comply with supplier selection standards to ensure that suppliers are chosen properly; Sign contracts with customers, suppliers and partners according to clear terms and work under those terms, ensure all notifications are accurate.

Besides, all employees must follow safety and quality management procedures to ensure the consistency of the company's products and services, handle every threat properly and cooperate with the suppliers to find a mutually beneficial solution for the arisen issues and do proper action if the supplier or partner's behavior is contrary to the principles of this Code

TO SUPPLIERS

PTEXIM always wants to have a stable and reliable supply source basing on stable and equal benefits relationships with raw material suppliers and services are at high – standard level. Therefore, PTEXIM commits to building image of a prestigious, respectful and honest company to the suppliers.

Firstly, PTEXIM commits to complying with regulations of the Law related to transactions with the suppliers.

Secondly, PTEXIM commits to dealing with suppliers on the principle of fairness, honesty, objectivity and harmony of benefits. Supplies selection of PTEXIM is based on determined facts such as price competitiveness, quality and other suitable standards and conditions. At the same time, PTEXIM always supports the suppliers to compete fairly, equally and fiercely for the same business goals and show determined attitude to illegal or unethical doings.

Besides, PTEXIM recommends the suppliers respect the Code of Conduct as well as business ethics, comply with the Law and ensure that suppliers' products and services meet the standard of PTEXIM

PTEXIM is responsible for bringing profits as well as transparent and honest report on business situation for the shareholders. Therefore, we ealways must effort to fulfill our responsibilities at our best, show professionalism, respect and friendliness with all of the shareholders

TO SHAREHOLDERS

TO CONSUMERS

PTEXIM always tries to ensure delivered products to customers are safe and have good quality. Because we supply and distribute to customers on the worldwide, it is absolutely important that we must verify products' safety and quality as well as products standard control steps as per the contracts between suppliers, customers and PTEXIM

TO
THE
GOVERNMENT,
THE LAW

PTEXIM is an upright company in all relationships with the government. We always respect, comply with the Law, and will be responsible for non-compliance.

PTEXIM commits not to doing illegal and unethical actions for collecting or concealing the information in order to bring benefits to the company.

At the same time, **PTEXIM** commits not to bribing to achieve special benefits.

While working, **PTEXIM's** employees must not be on behalf of the company to take actions such as giving the gifts, supplying substantial valued entertainment activities to the government staff to achieve the purpose

TO THE
ENVIRONMENT

PTEXIM will effort to invest, use equipment and machinery as well as produce eco-friendly products. All wastes which are generated during the production process are controlled and handled according to law regulations. PTEXIM supports activities building a friendly green environment, protecting land, water and air resources, ...

TO
COMMUNITY
ACTIVITIES

PTEXIM is aware of the importance of the companies to economic and social development for the community. Therefore, PTEXIM encourages public utility investment activities, PTEXIM ensures company's charitable contributions are suitable and deserving

IMPLEMENTATION GUIDANCE AND PENALTY OF THE CODE OF CONDUCT

- 1 IMPLEMENTATION GUIDANCE
- 2 ANNOUNCING THE ADJUSTMENT
- 3 ENCOURAGEMENT AND REWARD TERM
- 4 PENALTY

IMPLEMENTATION

Each member of PTEXIM has the responsibility of finding, understanding and complying with the regulations of the Code and the applied rules relating to their work. Appreciate vigilance, prevent non-compliance cases and protect PTEXIM's prestige by actively supporting ethical behaviors.

Ask for instruction from PTEXIM managers or those responsible for PTEXIM's human resource when we do not know whether followed action is right or not or doubt there are non-compliance actions occurring. The department which is appointed by the General Director and Board of Directors will be responsible for receiving feedbacks and notices about violations. This department is obliged to support cases that need to be consulted as well as establishing, collecting information in order to ensure conformity, satisfaction and effect of the Code of Conduct to PTEXIM in every time period

PENALTY

Depending on the violation level and type, the company will have suitable and reasonable punishment. Punishing will be discussed and voted by the authoritative council on the basis of strictness and impartiality. Some punishment forms include reminding, criticism, warning, salary deduction, demotion, dismissal. In addition, if the violation causes loss of assets and spirit, the violator must compensate according to the actual losses and the regulations of Vietnamese law

ANNOUNCING THE ADJUSTMENT

Any changes to the Code of Conduct will be announced to the company's departments then it is possible to inform all employees

ENCOURAGEMENT AND REWARD TERM

PTEXIM appreciates all employees who express their concerns, opinions or views about the Code of Conduct as well as other related documents.

PTEXIM will reward worthy to the employees who have contributed effectively or actively built and improved the Code of Conduct