
Hanoi, February 12, 2025

DECISION OF THE BOARD OF DIRECTORS
Re: Issuing the Regulation on Information Disclosure
of An Binh Commercial Joint Stock Bank

THE BOARD OF DIRECTORS OF AN BINH COMMERCIAL JOINT STOCK BANK

- Pursuant to the Law on Credit Institutions dated January 18, 2024;
- Pursuant to the Law on Securities dated November 26, 2019;
- Pursuant to the Law on Enterprises dated June 17, 2020, amended and supplemented on January 11, 2022;
- Pursuant to Decree No. 155/2020/ND-CP dated December 31, 2020 of the Government detailing the implementation of a number of articles of the Law on Securities;
- Pursuant to Circular No. 96/2020/TT-BTC dated November 16, 2020 of the Minister of Finance guiding the disclosure of information on the securities market;
- Pursuant to the current Charter of An Binh Commercial Joint Stock Bank;
- Based on the results of voting of the Board of Directors' members according Submission code ABBANK02-2025 of the Board of Directors' Office;
- Considering the proposal of the Board of Directors' Office in Submission No. 02/TT-VPHDQT dated January 3, 2025 of the Board of Directors' Office of An Binh Commercial Joint Stock Bank,

DECIDED:

- Article 1.** To issue, together with this Decision, the Regulation on Information Disclosure of An Binh Commercial Joint Stock Bank.
- Article 2.** This Decision takes effect from the date of issuance. Cease the validity of Decision No. 132/QD-HDQT.21 dated June 11, 2021 of the Board of Directors from the effective date of this Decision.
- Article 3.** Members of the Board of Directors, General Director; relevant divisions and individuals are responsible for implementing this Decision./.

ON BEHALF OF THE BOARD OF DIRECTORS
CHAIRMAN

Recipients:

- BOD, SB;
- BOM;
- Filed at BOD Office and Admin Division.

(Signed)

Đào Mạnh Kháng

Code: QC.PR.001

TRACKING DOCUMENT EDITING				
I. DRAFTING UNIT				
No.	Names	Title	Unit	Signature
1.	Tran Nam Son	Chief Office	Office of the Board of Directors	<i>(Signed)</i>
II. CONTROL UNIT				
No.	Names	Title	Unit	Signature
1.	Dat Khanh Toan	Head of the Division	Legal and Compliance Division	<i>(Signed)</i>
2.	Pham Duy Hieu	General Director		<i>(Signed)</i>
III. PERSON SIGNING TO APPROVE THE ISSUANCE				
No	Names	Title	Unit	Signature
1.	Đao Manh Khang	Chairman	Board of Directors	<i>(Signed)</i>
IV. PROMULGATION AND AMENDMENT PROCESS				
Time	Date of Issuance	Brief of Contents		
4	12/02/2025	Decision No. 36/QD-HDQT.25 on promulgating Regulation on Information Disclosure of An Binh Commercial Joint Stock Bank		
3	11/06/2021	Decision No. 132/QD-HDQT.21 on promulgating Regulation on Information Disclosure of An Binh Commercial Joint Stock Bank		
2	27/05/2020	Decision No. 68/QD-HDQT.20 on Promulgating Regulation on Information Disclosure of An Binh Commercial Joint Stock Bank		
3	14/10/2013	Decision No. 98/QD-HDQT.13 on promulgating Regulation Information Disclosure		

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**REGULATIONS ON INFORMATION DISCLOSURE OF AN BINH
COMMERCIAL JOINT STOCK BANK**

(Issued together with Decision No. /QĐ-HĐQT.25 dated/... /2025)

Chapter I**GENERAL PROVISIONS****Article 1. Purpose of issuance**

- 1.1. This Regulation is issued to ensure compliance with the obligation to disclose information as prescribed by law; ensure that the provision of information to management agencies, shareholders, investors and the public is implemented in a transparent, fair and consistent manner with best corporate governance practices; contribute to enhancing the reputation and image of ABBANK in the market.
- 1.2. This Regulation must be disseminated to relevant individuals and departments and reviewed annually for timely amendments, supplements and updates in accordance with the provisions of laws and the actual requirements of ABBANK's operations.¹

Article 2. Scope and subjects of application

- 2.1. This Regulation regulates the implementation of the obligation to disclose information on the stock market in accordance with the provisions of laws and instructions of competent management agencies; the public announcement and communication of information related to ABBANK.
- 2.2. Reporting, explaining and providing information to competent government agencies not specified in this Regulation shall be carried out in accordance with the current regulations on information and reporting regimes or according to specific written requests of competent state agencies.
- 2.3. This Regulation applies to all of the following subjects:
 - a) ABBANK and related divisions and individuals of ABBANK;
 - b) Shareholders and Related Persons of ABBANK shareholders;
 - c) Investors or groups of investors in ABBANK shares;
 - d) Internal Persons and Related Persons of Internal Persons of ABBANK.

Article 3. Definitions and abbreviations

3.1.ABBANK/Bank: An Binh Commercial Joint Stock Bank.

3.2.GMS: General Meeting of Shareholders.

3.3.BOD: Board of Directors.

3.4.SSC: State Securities Commission.

3.5.SE: Stock Exchange.

¹ Point e Clause 2 Article 20 Circular 41/2016/TT-NHNN

Code: QC.PR.001

- 3.6.SBV:** State Bank of Vietnam.
- 3.7.VSDC:** Vietnam Securities Depository and Clearing Corporation.
- 3.8.ABBANK Website:** ABBANK's official website at www.abbank.vn.
- 3.9.IDS:** A subsystem in the Information Disclosure System of the UBCK located at <https://ids.ssc.gov.vn>. Information reported and published by ABBANK via IDS includes: reports at the request of the SSC and reports and information published related to securities offerings and issuances as prescribed in Decree No. 155/2020/ND-CP dated December 31, 2020 of the Government detailing the implementation of a number of articles of the Securities Law and Circular No. 118/2020/ND-CP dated December 31, 2020 of the Ministry of Finance guiding a number of contents on securities offerings and issuances, public offers, share repurchases, public company registration and cancellation of public company status for treasury stock trading, public offers, public company registration and cancellation of public company status².
- 3.10. CIMS/HNX:** Is the company information management for listed/registered companies of the Hanoi Stock Exchange located at <https://cims.hnx.vn>. Information reported and published by ABBANK via CIMS includes all reports and information published periodically or irregularly in accordance with current laws.
- 3.11. EBTS/VNX:** Is a system managed by the Vietnam Stock Exchange to report and publish information from the EBTS system (Internet Trading System). Information reported and published by ABBANK via VNX includes all reports and information published periodically or irregularly in accordance with current laws.
- 3.12. Cbond/Corporate Bond Information Portal:** Is a corporate bond information portal operated by the Hanoi Stock Exchange at <https://cbonds.hnx.vn> Information reported and published by ABBANK via Cbond is reports and information related to bonds for which ABBANK is the issuer or provides services related to bond issuance in accordance with current laws.
- 3.13. Information disclosure unit:** Marketing Division except for information disclosure on Cbond Information disclosure unit is Capital Source, Financial Market and Transaction Bank Division.
- 3.14. Information provision unit:** Units under ABBANK.
- 3.15. Major shareholder:** A shareholder who directly or indirectly owns 5% or more of ABBANK's voting shares.
- 3.16. Internal Persons:** Subjects identified according to the provisions of the current Securities Law for the purpose of information disclosure specified in this Regulation, including: Chairman, Vice Chairman, member of the Board of Directors; Legal representative; General Director, Deputy General Director, Director of Finance/Director of Finance - Accounting, Chief Accountant; Head of the Supervisory Board, member of the

² Clause 2, Article 17 of the Regulations on the use of the information disclosure system of the State Securities Commission issued together with Decision No. 245/QĐ-UBCK dated February 29, 2024 of the State Securities Commission.

Supervisory Board; member of the Internal Audit; Company Secretary, Person in charge of corporate governance; Person authorized to disclose information.

3.17. Related Persons of ABBANK, of major shareholders, of ABBANK Internal Persons are determined according to the provisions of the current Securities Law for the purpose of disclosing information as prescribed in this Regulation. In addition, in cases where the Law on Credit Institutions stipulates the obligation to disclose information of other subjects and their Related Persons, these subjects and their Related Persons shall be determined according to the corresponding provisions of the Law on Credit Institutions for the purpose of performing the obligation to disclose information as prescribed in this Regulation.

3.18. Approved auditing organization: An auditing organization approved by a competent State agency to conduct audits, review financial statements, financial information and other reports of public interest entities in the securities sector according to the provisions of Ministry of Finance.

3.19. Public communication: Is the provision of information to the press (written, spoken, visual, electronic newspapers), electronic information pages, forums, social networks, and other mass media channels.

Article 4. References

4.1. External documents

- Law on Credit Institutions dated January 18, 2024.
- Law on Securities dated November 26, 2019, amended and supplemented on November 29, 2024.
- Law on Enterprises dated June 17, 2020, amended and supplemented on January 11, 2022.
- Decree No. 153/2020/ND-CP dated December 31, 2020 of the Government regulating the offering and trading of individual corporate bonds in the domestic market and the offering of corporate bonds to the international market; amended and supplemented by Decree No. 65/2022/ND-CP dated September 16, 2022 and Decree 08/2023/ND-CP (referred to as “Decree 153/2020/ND-CP”).
- Decree No. 155/2020/ND-CP dated December 31, 2020 of the Government detailing the implementation of a number of articles of the Law on Securities (referred to as “Decree 155/2020/ND-CP”).
- Decree No. 156/2020/ND-CP dated December 31, 2020 of the Government providing for administrative sanctions for violations in the field of securities and the securities market.
- Circular No. 96/2020/TT-BTC dated November 16, 2020 Guiding the disclosure of information on the securities market and has been amended and supplemented by Circular No. 68/2024/TT-BTC dated September 18, 2024 (referred to as “Circular 96/2020/TT-BTC”).
- Circular No. 68/2024/TT-BTC dated September 18, 2024 Amending and supplementing a number of articles of circulars regulating securities transactions on the securities trading system; Clearing and payment of securities transactions; Securities Company

Activities and Information Disclosure on the Stock Market (referred to as "Circular 68/2024/TT-BTC").

- Circular No. 122/2020/TT-BTC dated December 31, 2020 Guiding the information disclosure and reporting regime according to the provisions of Decree 153/2020/ND-CP.
- Circular No. 118/2020/ND-CP dated December 31, 2020 of the Ministry of Finance guiding a number of contents on offering, issuing securities, public offering, repurchasing shares, registering public companies and canceling public company status.
- Circular No. 41/2016/TT-NHNN dated December 30, 2016 of the State Bank of Vietnam Regulating capital adequacy ratio for banks and foreign bank branches has been amended and supplemented according to Circular No. 22/2019/TT-NHNN dated November 15, 2019, Circular No. 22/2023/TT-NHNN dated December 29, 2023 (Consolidated Document No. 05/VBHN-NHNN dated March 1, 2024 of the State Bank of Vietnam).
- Circular No. 13/2018/TT-NHNN dated May 18, 2018 of the State Bank of Vietnam on the internal control system of commercial banks and foreign bank branches has been amended and supplemented by Circular No. 40/2018/TT-NHNN dated December 28, 2018, Circular No. 14/2019/TT-NHNN dated August 30, 2019, Circular No. 14/2023/TT-NHNN dated November 20, 2023 and Circular No. 09/2024/TT-NHNN dated July 1, 2024 (Consolidated Document No. 20/VBHN-NHNN, dated July 15, 2024 of the State Bank of Vietnam).
- Circular No. 34/2024/TT-NHNN dated June 30, 2024 of the State Bank of Vietnam regulating the issuance of new licenses, issuance of additional business contents to licenses and organization and operation of commercial banks, foreign bank branches, representative offices in Vietnam of foreign credit institutions, and other foreign organizations with banking activities (referred to as "Circular 34/2024/TT-NHNN").
- Circular No. 32/2024/TT-NHNN dated June 30, 2024 of the State Bank of Vietnam regulating the network of commercial banks (referred to as "Circular 32/2024/TT-NHNN").
- Circular No. 50/2018/TT-NHNN dated December 31, 2018 of the State Bank of Vietnam regulating the dossiers, procedures and formalities for approving certain changes of commercial banks and foreign bank branches, as amended and supplemented by Circular No. 06/2022/TT-NHNN dated June 30, 2022 and Circular No. 22/2024/TT-NHNN dated June 28, 2024.
- Circular No. 202/2014/TT-BTC dated December 22, 2014 of the Ministry of Finance guiding the method of preparing and presenting Consolidated Financial Statements. - Circular No. 183/2013/TT-BTC dated December 4, 2013 of the Ministry of Finance on independent audit of public interest entities (amended and supplemented).
- Regulations guiding the use of the information disclosure system of the SSC issued under Decision No. 245/QD-UBCK dated February 29, 2024 of the State Securities Commission.

- Current information disclosure regulations on the Ho Chi Minh City Stock Exchange, Hanoi Stock Exchange, and Vietnam Stock Exchange.

4.2. Internal documents

- Current Charter of An Binh Commercial Joint Stock Bank.
- Current internal Regulations on governance of An Binh Commercial Joint Stock Bank.
- Regulations on the approval of decisions of the Board of Directors issued together with Decision No. 283/QD-HDQT22 dated December 30, 2022 of the Board of Directors.
- Regulations on drafting, issuing and managing internal documents of An Binh Commercial Joint Stock Bank issued together with Decision No. 248/QD-HDQT.23 dated October 6, 2023 of the Board of Directors.
- Policy on compliance with capital adequacy ratio at ABBANK issued together with Decision No. 220/QD-HDQT.24 dated July 1, 2024 of the Board of Directors.

The above referenced documents include amended, supplemented or replaced documents issued later (if any).

Article 5. General principles in information disclosure³

- 5.1. Information disclosure must be complete, accurate, timely, and in accordance with the provisions of law and this Regulation.
- 5.2. Information disclosure must be conducted by a competent person. The content of the disclosed information has been approved by a competent authority.
- 5.3. Ensure publicity, transparency, and fair and convenient access for Shareholders and the Public to the disclosed information. The disclosed data must be consistent with the data in the Financial Statements at the same time.
- 5.4. The language used for information disclosure is Vietnamese to ensure clarity, ease of understanding, and to avoid misunderstandings. ABBANK shall simultaneously disclose information in English *for the disclosed information according to the following roadmap:*
 - a) *Periodically disclose information simultaneously in English from January 1, 2025;*
 - b) *Disclose extraordinary information, disclose information upon request and disclose information on other activities of ABBANK simultaneously in English from January 1, 2026;*

Information disclosed in English must be consistent with the content of information disclosed in Vietnamese. In case of differences or different understandings between information in Vietnamese and English, information in Vietnamese shall prevail.
- 5.5. ABBANK's centralized means of information disclosure is the ABBANK Website. Information disclosed via the ABBANK Website must be kept for at least 5 years on this website.

³ Article 4 Circular 96/2020/TT-BTC; Article 295 Decree 155.

Code: QC.PR.001

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- 5.6. The information disclosure entity must simultaneously report all information disclosed as prescribed to the State Securities Commission, the SBV, the Stock Exchange, and VSDC.
 - 5.7. The information *provision* and *disclosure* entity must ensure that *the information provided and disclosed is truthful, accurate, complete, and timely and must* be responsible for *providing and publicly disclosing* such information⁴. In case of any change in the content of the disclosed information, the information disclosure entity must disclose the changed content and the reason for the change compared to the previously disclosed information.
 - 5.8. The information disclosure entity is responsible for preserving and storing the disclosed information in the form of documents and electronic data for at least 10 years;
 - 5.9. The disclosure of personal information to the public, including valid ID card/citizen identification card/citizen identification card/passport number, contact address, permanent address, telephone number, fax number, email, securities trading account number, securities depository account, bank account, is only carried out if the relevant subject agrees. In case the disclosed information includes the above personal information and the subjects disclosing the information do not want to disclose the personal information to the public, they must send the SSC and the Stock Exchange 02 copies of the information disclosure document: 01 copy with full information and 01 copy without personal information.
 - 5.10. Ensure prevention of conflicts of interest. Members of the BOD, Supervisors, General Directors, other managers and Related Persons of these members are not allowed to use information that has not been permitted to be disclosed by ABBANK or disclose it to others to carry out related transactions.

Article 6. Persons performing information disclosure⁵

- 6.1. Persons performing information disclosure of ABBANK:
 - a) ABBANK performs the obligation to disclose information through its legal representative. The legal representative of ABBANK may authorize another person to disclose information and is responsible for the completeness, accuracy and timeliness of the information disclosed by the authorized person. The authorization shall be made in writing;
 - b) Reporting and re-reporting information about the person performing information disclosure to the and the Stock Exchange must be done within 24 hours from the time the appointment, authorization or change of the person performing information disclosure takes effect. The content of the information reported about the person performing information disclosure includes: Authorization to disclose information according to the form prescribed in Appendix I and Information provision

⁴ Article 49.6 Law on Credit Institutions

⁵ Article 6 Circular 96/2020/TT-BTC; Decision 245/QD-UBCK

according to the form prescribed in Appendix III issued together with Circular 96/2020/TT-BTC;

- c) The registration, updating and changing of information of the person in charge of information disclosure via the IDS system and the reporting system of the Stock Exchange shall be carried out in accordance with the Regulations on the use of IDS of the SSC and relevant regulations of the Stock Exchange from time to time;
- d) In case an information disclosure event occurs and both the legal representative and the person authorized to disclose information are absent and unable to disclose information, the General Director shall replace them in disclosing information;
- e) ABBANK's information disclosure unit is the focal point for disclosing information of ABBANK in accordance with the provisions of law and this Regulation;
- f) The sending of periodic reports or reports on events requiring information disclosure to the State Bank, the State Securities Commission, the Stock Exchange, and competent management agencies shall be the responsibility of the Information Provider Unit after approval by the competent authority.

6.2. Shareholders and Related Persons of ABBANK Shareholders; Investors or groups of investors of ABBANK shares; Internal Persons and Related Persons of ABBANK Internal Persons must themselves disclose information or authorize other units or individuals to disclose information according to the provisions of Clause 2 Article 6 of Circular No. 96/2020/TT-BTC and must be responsible for the disclosed information according to the provisions of law and this Regulation.

Article 7. Means of reporting and information disclosure⁶

7.1. Means of information disclosure include:⁷

- a) ABBANK website;
- b) IDS system of the State Securities Commission;
- c) *CIMS system, Cbond of HNX*, Reporting and information disclosure system of *VNX, VSDC*;
- d) Other means of information disclosure as prescribed by law (including media of the State Bank, printed newspapers, electronic newspapers).

7.2. ABBANK establishes and maintains an electronic information page that ensures the following requirements:

- a) Contains contents on business lines and professions and contents that must be publicly announced as prescribed by the Law on Enterprises; Law on Credit

⁶Article 7 Circular 96/2020/TT-BTC; Point b Clause 4 Article 37 Law on Credit Institutions.

⁷Pursuant to the Regulations issued together with Decision No. 245/QĐ-UBCK, Official Dispatch No. 1315/UBCK-GSDC of the State Securities Commission, Official Dispatch No. 580/SGDHN-QLNY dated March 7, 2024 of the HNX, from March 8, 2024, companies listed/registered for trading at the HNX will only report and publish on CIMS (stop reporting and publishing periodic and irregular information on IDS), except for reporting and publishing information related to securities offering and issuance and reporting and publishing information as required by the State Securities Commission, which will continue to be done via IDS. Companies listed at HOSE will continue to report and publish information via both IDS and the HOSE System.

Institutions; Law on Securities and any changes related to these contents; have a separate section on shareholder relations (investors), in which the ABBANK Charter, Information Disclosure Regulations, Internal Regulations on Governance, Regulations on the Operation of the BOD, Regulations on the Operation of the Board of Supervisors, Financial Reports, Annual Reports, Prospectus (if any) and information disclosed periodically, irregularly and in accordance with the law and this Regulation;

- b) Display the time of posting information, while ensuring that investors can easily search and access data on that electronic information page;
- c) Keep the disclosed information for at least 5 years on the ABBANK Website;
- d) In case of changing the address of the ABBANK Website, it must be reported to the State Securities Commission, the Stock Exchange and publicly announced the change within 03 working days from the date of change of the address of this electronic information page.

7.3. Method of sending information disclosure:

- a) Information providers under ABBANK and other subjects with information disclosure obligations must send information disclosure and coordinate as requested by the Information Disclosure Unit to post on the ABBANK Website, on other information disclosure means as prescribed. The BOD' Office receives information disclosure from shareholders, Related Persons of shareholders, *Related Persons of ABBANK, Related Persons of ABBANK Internal Persons* and coordinates with the Information Disclosure Unit to make the disclosure;
- b) The Information Disclosure Unit makes the disclosure on the IDS, the Reporting and Information Disclosure System of the Stock Exchange and other information disclosure means as prescribed;
- c) In case the obligation to disclose information arises on a day off or holiday, the information disclosure shall be made on the working day following the day off or holiday.

Article 8. Information disclosure documents

8.1. For documents in the form of originals and valid copies

- a) For documents of individuals: Documents with full name and signature of the individual;
- b) For documents of organizations: Documents of organizations signed and sealed by authorized persons of that organization.

8.2. For documents in the form of electronic data: Created and sent according to the format and instructions of the relevant unit or organization.

Article 9. Suspension of information disclosure⁸

⁸ Article 8 Circular 96/2020/TT-BTC

- 9.1. ABBANK and related entities may suspend information disclosure in cases of force majeure such as natural disasters, fires, wars, epidemics and other force majeure reasons, but must report to the SSC and the Stock Exchange on the suspension of information disclosure immediately upon the occurrence of the event (clearly stating the reason for the suspension of information disclosure), and at the same time announce the suspension of information disclosure.
- 9.2. Immediately after overcoming the force majeure situation, ABBANK and related entities must fully disclose all information that has not been previously disclosed in accordance with the law.

Article 10. Handling of violations

Any entity or individual that violates the provisions on information disclosure shall, depending on nature, extent and subject of the violation, be subject to disciplinary action, administrative sanctions or criminal prosecution. If damage is caused, compensation must be paid in accordance with the provisions of law and ABBANK.

Chapter II

PERFORMANCE OF ABBANK'S INFORMATION DISCLOSURE OBLIGATIONS

Article 11. Periodic information disclosure

11.1. Annual financial statements (audited by an approved auditing organization)⁹.

- a) Annual financial statements including individual annual financial statements and consolidated annual financial statements must have full reports, appendices, and explanations in accordance with the law on corporate accounting.
- b) The full text of the audited annual financial statements must be fully disclosed, including the audit report on such financial statements. In case the auditor does not accept the financial statements in full, ABBANK must disclose the annual financial statements, the audit report, and ABBANK's explanatory document;
- c) *In case the auditing organization gives an audit opinion that is not an unqualified audit opinion on the financial statements or the financial statements with retroactive adjustments, ABBANK must disclose information on the audit opinion and the results of retroactive adjustments to the financial statements;*
- d) Deadline for publishing the annual financial statements: Within 10 days from the date the auditing organization signs the audit report **but not exceeding 90 days from the end of the fiscal year.**
- e) When publishing the financial statements, ABBANK must simultaneously explain the reasons when one of the following cases occurs **based on ABBANK's financial statements and consolidated financial statements**¹⁰:

⁹ Article 10.1 Circular 96/2020/TT-BTC

¹⁰ Article 14.4 and 14.5 Circular 96/2020/TT-BTC

- Profit after corporate income tax in the Business Performance Report of the reporting period changes by 10% or more compared to the report of the same period of the previous year;
- Profit after tax in the reporting period is a loss; or the profit in the report of the same period of the previous year is changed to a loss in this period or vice versa;
- The difference in profit after tax in the reporting period before and after auditing or review is 5% or more, changing from loss to profit or vice versa.

11.2. Semi-annual financial statements (reviewed by an approved auditing organization)¹¹.

- a) Semi-annual financial statements including separate semi-annual financial statements and consolidated semi-annual financial statements must ensure that they are full interim financial statements in accordance with the Accounting Standard “Interim financial statements”, presenting financial data in the first 6 months of ABBANK’s fiscal year. Semi-annual financial statements must be reviewed in accordance with the Standards on financial statement review. The full text of the semi-annual financial statements must be fully disclosed, together with the *review conclusion* and ABBANK’s explanatory document in case the *review conclusion is not an unqualified conclusion*;
- b) *In case the auditing organization gives a review conclusion that is not an unqualified review conclusion for the financial statements or the financial statements with retroactive adjustments, ABBANK must disclose information about the review conclusion and the results of retroactive adjustments to the financial statements*;
- c) Deadline for publishing semi-annual financial reports: 05 days from the date the auditing organization signs the review report, *but no later than 60 days from the end of the first 6 months of the fiscal year*;
- d) Implement the requirements specified in Point d Clause 11.1 of this Article.

11.3. Quarterly financial statements or audited quarterly financial statements (if any)¹².

- a) Quarterly financial statements including separate quarterly financial statements and consolidated quarterly financial statements must be full interim financial statements in accordance with the Accounting Standard “Interim financial statements”. The full text of the quarterly financial statements or audited quarterly financial statements (if any) must be fully disclosed, accompanied by the audit opinion and explanatory document of ABBANK in case the audited quarterly financial statements have a review conclusion that is not a fully accepted conclusion;
- b) Deadline for disclosure of quarterly financial statements: *30 days from the end of the quarter. In case ABBANK has an audited quarterly financial statement, the*

¹¹ Article 14.2 Circular 96/2020/TT-BTC

¹² Article 14.3 Circular 96/2020/TT-BTC

disclosure must be made within 05 days from the date the auditing organization signs the audit report but not exceeding 45 days from the end of the quarter.

- c) Implement the requirements specified in Point d Clause 11.1 of this Article.

11.4. Annual report¹³

ABBANK must prepare an annual report according to the form prescribed in Appendix IV issued with Circular No. 96/2020/TT-BTC and publish this report within 20 days from the date of publication of the audited annual financial statements but no later than 110 days from the end of the fiscal year.

The financial information in the annual report must be consistent with the audited annual financial statements.

11.5. Annual General Meeting of Shareholders¹⁴

- a) At least 51 days before the expected opening date of the General Meeting of Shareholders, ABBANK must announce information on the last registration date (the closing date of the shareholder list) to exercise the right to attend the meeting. The closing date of the shareholder list is at least 20 days after the date of announcing the closing date of the shareholder list but not earlier than 10 days before the date of sending the meeting invitation;
- b) At least 21 days before the opening date of the General Meeting of Shareholders, ABBANK must send a notice convening the General Meeting of Shareholders and announce information on the ABBANK Website and *the CIMS System* of the Stock Exchange regarding the General Meeting of Shareholders, clearly stating the link to all documents of the Annual General Meeting of Shareholders, including: Meeting invitation, sample of proxy representative, expected meeting agenda, voting form, list and information of candidates in case of election of members of the BOD, members of the Supervisory Board; Reference documents as a basis for passing decisions and draft resolutions for each issue in the meeting agenda;
- c) Meeting documents of the General Meeting of Shareholders must be posted and updated with amendments and supplements (if any);
- d) Meeting minutes and Resolutions of the General Meeting of Shareholders must be disclosed according to regulations no later than 24 hours from the end of the General Meeting of Shareholders.

11.6. Corporate governance report¹⁵

¹³ Article 10.2 Circular 96/2020/TT-BTC

¹⁴ Article 10.3 Circular 96/2020/TT-BTC; Article 141.1 and Article 143.1 Law on Enterprises 2020; Article 271.1 Decree 155/2020/NĐ-CP.

¹⁵ Article 10.4 Circular 96/2020/TT-BTC

Every 6 months and year, ABBANK must disclose information on the ABBANK governance report prepared according to the form prescribed in Appendix V issued with Circular 96/2020/TT-BTC; *the disclosure period is 30 days from the end of the first 6 months of the year and the end of the calendar year.*

11.7. Capital adequacy ratio¹⁶

Every 6 months of the fiscal year, ABBANK must disclose information on the capital adequacy ratio according to the contents specified in the Capital adequacy ratio *compliance* policy at ABBANK issued together with *Decision No. 220/QĐ-HĐQT.24 dated July 10, 2024* of the Board of Directors and amendments, supplements and replacements from time to time. The deadline for disclosing information on the capital adequacy ratio is the deadline for disclosing semi-annual financial statements and annual financial statements. *The General Director may consider postponing the disclosure deadline, but the disclosure time shall not be later than 30 days from the date of disclosing semi-annual financial statements and annual financial statements.*

11.8. Other periodic information disclosure

ABBANK performs the obligation to disclose other periodic information according to the regulations of the State Bank, the Ministry of Finance, the State Securities Commission, the Stock Exchange, and *VSDC* arising in each period.

Article 12. Disclosure of extraordinary information¹⁷

12.1. ABBANK must disclose extraordinary information within 24 hours from the occurrence of one of the following events:

- a) ABBANK's account is frozen at the request of a competent authority or when the payment service provider detects signs of fraud or violations of the law related to the payment account; the account is allowed to operate again after being frozen in the cases specified in this point;
- b) Upon receipt of a document from a competent State agency or when ABBANK has a decision to temporarily suspend part or all of its business activities; change the content of business registration; revoke the Business Registration Certificate; amend, supplement or suspend, revoke the Establishment and Operation License;
- c) Approval of a decision of the extraordinary General Meeting of Shareholders. The published documents include: Resolution of the General Meeting of Shareholders, meeting minutes or vote counting minutes (in case of collecting shareholders' opinions in writing) and documents attached to the minutes. In case the General Meeting of Shareholders approves the delisting, ABBANK must disclose information about the delisting along with the approval rate of shareholders who are not major shareholders;
- d) Decision to repurchase ABBANK shares or sell treasury shares; date of exercising the right to purchase shares of bondholders with the right to purchase shares or date

¹⁶ Article 20 Thông tư 41/2016/TT-NHNN đã được sửa đổi, bổ sung

¹⁷ Article 11 and Article 15 Circular 96/2020/TT-BTC

- of converting convertible bonds into shares; decision to offer securities abroad and decisions related to the offering of securities;
- e) Decision on dividend level, form of dividend payment, time of dividend payment; decision to split or consolidate shares;
 - f) Decisions on enterprise reorganization (division, separation, consolidation, merger, conversion of enterprises), dissolution, bankruptcy of enterprises; change of tax code, change of Bank name, seal of ABBANK; change of location; establishment or closure of head office, branch, transaction office; issuance, amendment, supplement of Charter; strategy, medium-term development plan and annual business plan of ABBANK;
 - g) Decisions on changing the accounting period, applicable accounting policy (except for cases of changing the applicable accounting policy due to changes in legal regulations); notification of the auditing enterprise that has signed the annual financial statement auditing contract or change of auditing enterprise (after signing the contract); cancellation of the signed auditing contract;
 - h) Decisions on participating in capital contribution to establish, purchase to increase ownership in a company leading to that company becoming a **subsidiary or affiliated company**; or sell to reduce ownership in a subsidiary or associated company, resulting in the company no longer being a subsidiary or associated company; or dissolve the subsidiary or associated company;
 - i) Decision of the General Meeting of Shareholders or the BOD approving the contract or transaction between ABBANK and an Internal Person, a Related Person of an Internal Person or a Related Person of ABBANK;
 - j) When there is a change in the number of voting shares. The time of information disclosure is as follows:
 - In case ABBANK issues additional shares or converts bonds or preferred shares into common shares, it is calculated from the time ABBANK reports to the SSC on the issuance results and conversion results in accordance with the law on securities issuance;
 - In case ABBANK repurchases its own shares or sells treasury shares, it is calculated from the time ABBANK reports the transaction results in accordance with the law on repurchasing its own shares and selling treasury shares;
 - In case ABBANK buys back shares of employees under the Employee Stock Issuance Plan (ESOP Program) or buys back odd-lot shares at the request of shareholders, ABBANK shall disclose information within the first 10 days of the month based on completed transactions and updated to the date of information disclosure.
 - k) ABBANK changes, appoints, reappoints, or dismisses an internal person; receives a resignation letter from an internal person (clearly stating the effective date

according to the provisions of the Law on Credit Institutions, the Law on Enterprises, and the ABBANK Charter). At the same time, ABBANK sends to HNX a new internal person's information provision (if any) according to the form prescribed in Appendix III issued with Circular No. 96/2020/TT-BTC;

- l) Decides to buy, sell assets or conduct transactions with a value greater than 15% of ABBANK's total assets based on the audited (consolidated) financial statements of the last 6 months or the reviewed (consolidated) financial statements of the last 6 months;
- m) Upon receiving a decision to prosecute ABBANK, an internal person of ABBANK; temporarily detain or prosecute an internal person of ABBANK;
- n) Upon receipt of a legally effective judgment or decision of the Court relating to ABBANK's operations; Decision on sanctioning violations of tax laws;
- o) ABBANK receives a notice from the Court accepting the application for opening bankruptcy proceedings for the enterprise;
- p) In case ABBANK becomes aware of an event or information affecting the price of ABBANK's own securities, ABBANK must confirm or correct that event or information;
- q) When other events occur that have a major impact on the production, business activities or governance situation of ABBANK;
- r) Approval or cancellation of listing on a foreign Stock Exchange;
- s) Decision to increase or decrease the charter capital;
- t) Decision to contribute capital to invest in an organization, project, borrow, lend or other transactions with a value of 10% or more of the Bank's total assets in the most recent audited annual (consolidated) financial statement or the most recent reviewed semi-annual (consolidated) financial statement;
- u) Decision to contribute capital with a value of 50% or more of the charter capital of an organization (determined according to the charter capital of the organization receiving the capital contribution before the time of capital contribution).
- v) Other cases as prescribed by laws.

12.2. When disclosing information according to the provisions of Clause 12.1 of this Article, ABBANK must clearly state the event that occurred, the cause and the solutions (if any).

12.3. Disclosing information about the extraordinary General Meeting of Shareholders or passing the Resolution of the General Meeting of Shareholders in the form of collecting shareholders' opinions:

- a) The disclosure of information about the extraordinary General Meeting of Shareholders shall be implemented according to the provisions of Points b, c, d, Clause 11.5, Article 11 of this Regulation;
- b) In case of collecting shareholders' opinions to pass the decision of the General Meeting of Shareholders, the disclosure of information shall be at least 10 days

before the deadline for returning the opinion form. ABBANK must publish on the ABBANK Website, and send to all shareholders the opinion form, the draft Resolution of the General Meeting of Shareholders and documents explaining the draft resolution.

12.4. Disclosure of information related to the closing date of the shareholder list to exercise rights for existing shareholders

- a) ABBANK shall announce information about the closing date of the shareholder list to exercise rights for existing shareholders at least 10 days before the expected closing date, except for the case specified in Point b of this Clause
- b) ABBANK shall announce information about the expected closing date of the shareholder list to exercise rights for existing shareholders to attend the General Meeting of Shareholders at least 20 days before the expected closing date.

12.5. Disclosure of information on changes related to the License for Establishment and Operation of ABBANK

- a) In case the License for establishment and operation of ABBANK is amended or supplemented with the following contents: Name; head office location; charter capital; branch office location; content and duration of operation, ABBANK must publish the information on the State Bank's media, ABBANK's website and on a printed newspaper in 03 consecutive issues or on 01 electronic newspaper of Vietnam within 07 working days from the date of receipt of the State Bank's written **approval** to amend or supplement the License¹⁸;
- b) ABBANK shall make an announcement on the ABBANK Website and at its head office, branches/transaction offices within 07 working days before the expected opening date of the branch/transaction office or within 07 working days **from the date of receiving the approval document from the SBV branch on the change of location of the branch/transaction office (within the locality or between the localities of provinces and centrally run cities). The information announcement shall include:**
 - **Number, date, content of approval in the SBV's approval document on the establishment of a branch, transaction office or/and change of location of the branch's headquarters, transaction office;**
 - **Name, location, expected date of opening operations or name, old location, new location of the branch's headquarters, transaction office and other information (if necessary))¹⁹.**

At the same time, ABBANK must send a written request to the SBV (Communications Department) to post on the State Bank's Electronic Information Portal, post on 01 printed newspaper in 03 consecutive issues or on 01 electronic newspaper of Vietnam for the contents specified in this point.

¹⁸ Point b Clause 4 Article 37 Law on Credit Institutions; Point b Clause 3 Article 7 Circular 34/2024/TT-NHNN

¹⁹ Clauses 1 and 5 Article 23 Circular 32/2024/TT-NHNN

- c) **ABBANK shall make an announcement on the ABBANK website and at the head office, branches/transaction offices within 07 working days from the date of receiving the approval document from the SBV on the change of the branch managing the transaction office, the announcement content includes: number, date, approval content in the approval document of the SBV.**²⁰
- d) **ABBANK shall make an announcement on the ABBANK website and at the head office, branches/transaction offices within 07 working days from the date of making changes including: converting transaction offices into branches; changing the name of domestic branches, transaction offices; converting domestic branches into transaction offices; changing the address of domestic branches, transaction offices without changing the location; changing the name, location of representative offices, domestic public service units, branches/representative offices abroad; changing the name of branches, transaction offices, representative offices, public service units in case of Bank reorganization.**²¹
- e) **ABBANK shall publicly announce and post the termination of operations and dissolution on the ABBANK website, at the head office, the branch office managing the transaction office (for the termination of a transaction office) of ABBANK, and publish it in the central and local newspapers in the province or centrally-run city where the branch, transaction office, representative office, or public service unit is located within 07 working days from the date of termination of operations or dissolution of the branch, transaction office, representative office, or public service unit. The content of the announcement and public posting shall include at least:**
- **Name and address of the domestic branch, transaction office, representative office, or public service unit that terminates operations or dissolves;**
 - **Time of termination of operations or dissolution;**
 - **Responsibilities of ABBANK regarding the assets, rights, obligations, and related interests of the branch, transaction office, representative office, or public service unit that terminates operations or dissolves.**²²

12.6. Information disclosure in other cases:

- a) **ABBANK shall publish on the ABBANK Website and send this Regulation to the SBV (Banking Inspection and Supervision Agency) within 10 days from the date of issuance, amendment, supplementation, or replacement**²³;
- b) **After changing the accounting period, ABBANK shall publish the financial statements for the period between the two accounting periods of the old fiscal year and the new fiscal year in accordance with the law on corporate accounting within**

²⁰ Article 23.2 Circular 32/2024/TT-NHNN

²¹ Article 23.3 Circular 32/2024/TT-NHNN

²² Article 32 Circular 32/2024/TT-NHNN

²³ Điều 20.3 Circular 41/2016/TT-NHNN has been revised and supplemented

10 days from the date the auditing organization signs the audit report, but no later than 90 days from the start date of the new fiscal year.²⁴ .

Article 13. Disclosure of information upon request²⁵

13.1. In the following cases, ABBANK must disclose information within 24 hours from the time of receiving the request of the SSC and the Stock Exchange where ABBANK is listed or registered to trade shares when one of the following events occurs:

- a) The event seriously affects the legitimate interests of investors;
- b) There is information related to ABBANK that greatly affects the price of securities and that information needs to be confirmed.

13.2. The content of the information disclosed upon request must clearly state the event requested by the SSC and the Stock Exchange to be disclosed; the cause and ABBANK's assessment of the authenticity of that event, and remedial solutions (if any).

Article 14. Disclosure of information on other activities of ABBANK²⁶

14.1. Disclosure of information on offering, issuance, listing, registration for trading and reporting on capital use.

ABBANK shall perform the obligation *to report* and disclose information on public offering of securities, *private placement of securities*, listing, registration for trading and reporting on capital use in accordance with the provisions of Decree 155/2020/ND-CP, Decree 153/2020/ND-CP, Articles 19 and 20 of Circular 96/2020/TT-BTC, Circular 122/2020/TT-BTC and other provisions of law related to offering, issuance of securities, listing, registration for trading of securities when performing these activities.

14.2. Disclosure of information on foreign ownership ratio

ABBANK must disclose information on the maximum foreign ownership ratio at ABBANK and changes related to this ownership ratio on the electronic information page of ABBANK, the Stock Exchange, *VSDC* in accordance with the provisions of the securities law guiding foreign investment activities on the Vietnamese securities market.

14.3. Disclosure of information on transactions to repurchase its own shares, sell treasury shares

- In case ABBANK repurchases its own shares or sells treasury shares, ABBANK must disclose information in accordance with the provisions of the law on repurchasing its own shares and selling treasury shares.
- In case ABBANK buys back its own shares, after paying for all the bought back shares, if the total value of assets recorded in the accounting books decreases by more than 10%, ABBANK must notify all creditors and disclose information within 15 days from the date of completion of the obligation to pay for the bought back shares.

Article 15. Responsibilities of ABBANK units in implementing information disclosure

²⁴ Article 11.6, Article 15.1 Circular 96/2020/TT-BTC

²⁵ Article 12 and 16 Circular 96/2020/TT-BTC

²⁶ Article 13 and 17 Circular 96/2020/TT-BTC

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15.1. ***Annually, the Office of the BOD shall summarize information for the BOD so that the BOD can report to the General Meeting of Shareholders on information specified in Points a, d, e, Clause 16.1, Article 16 and Points a, b, d, Clause 17.7, Article 17 of this Regulation²⁷.***

15.2. The General Director is responsible for:

- a) Issuing the Information Disclosure Procedure to implement this Regulation, which specifically stipulates:
 - The sequence of steps and methods of implementation; required deadlines, forms to be used; mechanisms for monitoring and supervising compliance in performing information disclosure obligations;
 - Assigning responsibilities to units ***preparing reports***, providing information, other relevant units and individuals to ***ensure reporting, providing information*** fully, on time, in accordance with the required content and forms for the Information Disclosure Unit ***to carry out information disclosure, submit reports according to regulations***;
 - The Information Disclosure Procedure must be published on the ABBANK Website, reviewed, updated annually and sent to the SBV (Banking Inspection and Supervision Agency) within 10 days from the date of issuance, amendment, supplementation, replacement²⁸.
- b) Ensure to meet the necessary requirements on facilities, information technology systems, human resources; ensure good coordination between information providing units, support units, technical system operation management units with the information disclosure unit; inspection and supervision of compliance in the full and timely implementation of information disclosure obligations according to the provisions of law and this Regulation.
- c) ***Report to the General Meeting of Shareholders on credit facilities for subjects specified in Clause 1, Article 135 of the Law on Credit Institutions arising up to the time of data collection for the General Meeting of Shareholders²⁹***

15.3. Information disclosure unit:

- a) Manage the information disclosure deadline and ensure that the information is disclosed fully, on time and with the required content; proactively warn and remind units about the information disclosure deadline;
- b) Be the focal point of ABBANK in implementing information disclosure in accordance with the provisions of law and this Regulation; respond to the results of information disclosure via email to the Information Provider, the Office of the BOD, the Office of the General Director, and the Authorized Person to disclose information;

²⁷ Clause 4 Article 49 Law on Credit Institutions

²⁸ Clause 3 Article 20 Circular 41/2016/TT-NHNN

²⁹ Clause 10 Article 1 Circular 09/2024/TT-NHNN

Code: QC.PR.001

- c) Be responsible for managing the ABBANK Website login account, IDS, *CIMS* accounts and login accounts to the information disclosure system of other relevant management agencies to implement information disclosure;
- d) Be responsible for keeping information confidential upon receipt;
- e) Monitor and summarize reports on information disclosure in accordance with the provisions of this Regulation.

15.4. Information providing unit:

- a) Draft the content of reports and information to be disclosed according to regulations, submit to competent authorities for approval, forward to and coordinate with the Information Disclosure Unit to disclose information according to regulations;
- b) ***Monitor and inspect the implementation of information disclosure by the Information Disclosure Unit to ensure that information is disclosed on time and with correct content; coordinate and handle feedback from the Management Agency throughout the process until the submission of reports and disclosure of information according to regulations;***
- c) Be responsible for the ***content of the information*** provided and the completeness and ***accuracy of the disclosed information; ensure that information is provided*** on time, with correct content and in the prescribed form;
- d) Immediately notify the Information Disclosure Unit and coordinate when an event arises that requires the disclosure of unusual information in the field under the unit's responsibility;
- e) Be responsible for proposing to the competent authority to request an extension or postponement of information disclosure in case of failure to submit information on time;
- f) *Coordinate and consult, if necessary, with the Office of the BOD and the Office of the General Director in preparing reports and information content to be disclosed***Đơn vị cung cấp thông tin:**

15.5. Office of the BOD:

- a) Support the BOD in performing the task of monitoring and supervising the implementation of ABBANK's information disclosure obligations in accordance with the provisions of law;
- b) ***Support the Information Provider and Information Disclosure Unit to ensure that ABBANK complies with its information disclosure obligations in accordance with the provisions of law;***
- c) Perform the duties of the Information Provider for relevant information and decisions of the General Meeting of Shareholders and the BOD;

- d) Act as the focal point for receiving information disclosed by shareholders in accordance with the provisions of Chapter III of this Regulation to transfer to the Information Disclosure Unit for disclosure;
- e) Periodically review this Regulation annually to promptly update, amend and supplement it appropriately.

Chapter III

PERFORMANCE OF INFORMATION DISCLOSURE OBLIGATIONS OF SHAREHOLDERS, ABBANK INTERNAL PERSONS AND RELATED PERSONS

Article 16. Disclosure of information by shareholders owning 1% or more of charter capital, major shareholders, groups of Related Persons owning 5% or more of voting shares, groups of related foreign investors owning 5% or more of voting shares³⁰

16.1. Shareholders owning 01% or more of the charter capital at ABBANK must provide ABBANK with the following information:

- a) *Full name; personal identification number; nationality, passport number, date of issue, place of issue for shareholders who are foreigners; number of the Certificate of Business Registration or equivalent legal documents for shareholders who are organizations; date of issue, place of issue of this document;*
- b) *Information about Related Persons who are individuals, including: full name; personal identification number; nationality, passport number, date of issue, place of issue for foreigners; relationship with the information provider. Information about Related Persons who are organizations, including: name, enterprise code, head office address of the enterprise, number of the Certificate of Business Registration or equivalent legal documents; legal representative, relationship with the information provider;*
- c) *Number and percentage of shares owned by them at ABBANK;*
- d) *Number and percentage of shares owned by Related Persons at ABBANK;*

16.2. Shareholders owning 01% or more of the charter capital must send ABBANK in writing the information as prescribed in Clause 16.1 of this Article for the first time and when there is a change in this information within 07 working days. For the information in Point c and Point d of Clause 16.1 of this Article, shareholders must only provide information to ABBANK when there is a change in their share ownership ratio, their share ownership ratio and that of Related Persons from 01% or more of ABBANK's charter capital compared to the previous provision.

16.3. Organizations and individuals who are major shareholders of ABBANK must fulfill the following obligations:

³⁰ Article 49 Law on Credit Institution; Article 31 Circular 96/2020/TT-BTC

- a) Disclose information and report on transactions to ABBANK and the Stock Exchange according to the form prescribed in Appendix VII issued with Circular 96/2020/TT-BTC within 05 working days from the date of becoming or ceasing to be a major shareholder *in accordance with the provisions of Article 31 of Circular 96/2020/TT-BTC*;
- b) ***Comply with the obligation to provide information to ABBANK as prescribed in Clauses 16.1 and 16.2 of this Regulation.*** At the same time, disclose information and report to ABBANK and the Stock Exchange according to the form prescribed in Appendix VIII issued with Circular No. 96/2020/TT-BTC *within 05 working days from the date of change in the number of shares owned over the threshold of 01% of voting shares as prescribed in Clause 2, Article 31 of Circular 96/2020/TT-BTC*;
- c) ***In case of purchase or transfer leading to becoming a major shareholder, it must be approved in advance by the SBV as prescribed in Point d, Clause 1, Article 37 of the Law on Credit Institutions; the dossier and procedures for requesting prior approval from the SBV as prescribed in Circular No. 50/2018/TT-NHNN***

16.4. The provisions of Clause 16.3 of this Article also apply to groups of Related Persons or groups of related foreign investors owning 5% or more of the voting shares at ABBANK. Groups of related foreign investors owning 5% or more of the voting shares at ABBANK shall disclose information according to the form prescribed in Appendix IX and Appendix X issued with Circular 96/2020/TT-BTC based on the total number of shares held by such group of foreign investors.

16.5. The provisions of Clause 16.3 of this Article shall not apply to entities that do not actively conduct transactions in the event of a change in the voting stock holding ratio arising from ABBANK repurchasing its own shares or ABBANK issuing additional shares.

16.6. ***The ABBANK BOD Office is responsible for:***

- a) ***Posting and storing the information specified in Clause 16.1 of this Article at the ABBANK Head Office; drafting and submitting to the competent authority for signature and sending a written report to the SBV within 07 working days from the date ABBANK receives the information provided. Annually synthesizing the BOD' report to disclose the information specified in Points a, c, d, Clause 16.1 of this Article to the General Meeting of Shareholders;***
- b) ***Publicly announcing information about the full name of individuals and organizations that are shareholders owning 01% or more of the charter capital at ABBANK and the information specified in Points c and d, Clause 16.1 of this Article on the ABBANK Website within 07 working days from the date ABBANK receives the information provided;***
- c) Announce on ABBANK's Website within 03 working days after receiving the report related to the change in the share ownership ratio of ***major shareholders, groups of related people owning 5% or more of voting shares, groups of related foreign investors owning 5% or more of voting shares.***

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Article 17. Information disclosure of Internal Persons and Related Persons of Internal Persons³¹

17.1. ABBANK's Internal Persons and Related Persons of these entities (hereinafter referred to as Related Persons) must disclose information and report before and after conducting transactions to the Stock Exchange and ABBANK (*through the contact point of the BOD' Office*) when the expected transaction value per day is from VND 50 million or more or the expected transaction value per month is from VND 200 million or more calculated by par value (for shares, convertible bonds) or transfer value (for stock purchase rights, convertible bond purchase rights), including cases of transfer not through the trading system at the Stock Exchange (such as transactions for giving or being given, donating or being gifted, inheriting, transferring or receiving transfer of securities and other cases), specifically as follows:

- a) At least 03 working days before the expected transaction date, Internal Persons and Related Persons must disclose information about the expected transaction according to the form prescribed in Appendix XIII or Appendix XIV issued together with this Circular. according to Circular No. 96/2020/TT-BTC, *except for the case where the securities company is a related party of an Internal Person of ABBANK when conducting transactions according to the provisions of Clause 2, 3, Article 9a of Circular 120/2020/TT-BTC (amended and supplemented).*

*In case of conducting transactions according to the provisions of Clause 4, Article 9a of Circular 120/2020/TT-BTC (amended and supplemented), the exemption from information disclosure shall be applied to transactions conducted within 4 working days from the date the shares are transferred to the securities company's proprietary trading account*³²;

- b) The transaction period shall not exceed 30 days from the date of registration for the transaction. Internal Persons and Related Persons must conduct transactions according to the time, volume, and value announced by the Stock Exchange and may only conduct the first transaction on the trading day following the date of information announcement from the Stock Exchange;
- c) In case of making purchase transactions during stock issuances or public tender offers, the entities required to disclose information as prescribed in this Article shall be exempted from the obligations prescribed in Point b of this Clause and shall comply with the provisions of law on public offering, issuance and tender offers;
- d) Internal Persons and Related Persons shall not simultaneously register, purchase and sell shares, stock purchase rights, convertible bonds, and convertible bond purchase rights in the same registration and transaction period and shall only register and make subsequent transactions after reporting the completion of the previous transaction period;

³¹ Article 49 Law on Credit Institution; Article 33 Circular 96/2020/TT-BTC

³² Article 4.3 Circular 68/2024/TT-BTC

- e) Within 05 working days from the date of completion of the transaction (in case the transaction ends before the registration deadline) or the end of the expected transaction period, the Internal Person and Related Persons must disclose information on the transaction results and explain the reasons for not being able to execute the transaction or not executing the entire registered volume (if any) according to the form prescribed in Appendix XV or Appendix XVI issued with Circular No. 96/2020/TT-BTC;
- f) The Internal Person and Related Persons who are required to report and disclose information according to the provisions of this Article and are also required to report and disclose information according to the provisions of Article 16 of this Regulation shall only have to perform the obligation to disclose information applicable to Internal Persons and Related Persons prescribed in this Article.
- 17.2. The provisions on information disclosure obligations at points a, b and d, Clause 17.1 of this Article do not apply to cases where a securities company sells mortgaged shares of a customer who is an Internal Person of ABBANK or a Related Person of these entities.
- 17.3. In case after registering to conduct a transaction, the registrant is no longer an Internal Person of ABBANK or a Related Person of these subjects, the registered subject to conduct the transaction must still report and disclose information according to the provisions of Clause 17.1 of this Article.
- 17.4. In case political organizations, socio-political organizations (trade unions, youth unions, etc.), individuals holding other management positions as prescribed in ABBANK's Charter conduct transactions in shares, stock purchase rights, convertible bonds, and convertible bond purchase rights of ABBANK, they must perform the obligation to disclose information applicable to Internal Persons and Related Persons.
- 17.5. Within 03 working days after receiving reports related to securities transactions of Internal Persons and Related Persons as prescribed in this Article, ***the Office of the BOD of ABBANK*** must publish on ABBANK's Website.
- 17.6. ***In case the securities company is a related party of an Internal Person of ABBANK***
- a) ***When correcting ABB stock transactions, it is required to report to the Stock Exchange and ABBANK within 24 hours from the time of completion of the error correction transaction. In case of securities companies;***
- b) ***It is required to disclose information and report to the State Securities Commission, the Stock Exchange and notify ABBANK when the daily transaction value of ABB shares is from VND 50 million or more or the monthly transaction value is from VND 200 million or more calculated at par value, including cases of transferring ownership outside the securities trading system according to the form prescribed in Appendix XVIII issued with Circular 68/2024/TT-BTC within 24 hours from the time of completion of transaction payment as prescribed in Clause 2, Article 35a of Circular No.***

119/2020/TT-BTC or completion of the sale of shares as prescribed in Clause 3, Clause 4, Article 9a of Circular No. 120/2020/TT-BTC³³.

17.7. Members of the BOD, members of the Board of Supervisors, General Director, Deputy General Director of ABBANK must publicly disclose to ABBANK (***through the contact point of the BOD Office***) the following information ***in writing for the first time and when there is a change within 07 working days³⁴***:

- a) Name, enterprise code, head office address of the enterprise, economic organization in which you or you and your Related Person own capital contribution, shares of 5% or more of charter capital, ***including capital contribution, shares*** authorized, entrusted to other organizations, individuals;
- b) Name, enterprise code, head office address of the enterprise, ***economic organization*** in which you or your Related Person is a member of the BOD, member of the Board of Members, controller, member of the Board of Supervisors, General Director (Director);
- c) ***Information about the Related Person who is an individual, including: full name; personal identification number; nationality, passport number, date of issue, place of issue for foreigners; relationship with the information provider;***
- d) ***Information about the Related Person who is an organization, including: name, enterprise code, head office address of the enterprise, number of the Certificate of Business Registration or equivalent legal documents; legal representative, relationship with the information provider;***
- e) Other cases as prescribed in Clause 2, Article 164 of the Law on Enterprises; Clause 3, Article 291 and Article 299 of Decree 155/2020/ND-CP detailing the implementation of a number of articles of the Law on Securities (outside the scope of the cases prescribed in Points a, b, c, d and e of this Clause)

17.8. ***The ABBANK BOD Office is responsible for posting and storing the information specified in Clause 17.7 of this Article at the ABBANK Head Office; drafting and submitting to the competent authority for signature and sending a written report to the SBV within 07 working days from the date ABBANK receives the information provided. Annually, summarize the BOD' report to disclose the information specified in Points a, c, d Clause 16.1 of this Article to the General Meeting of Shareholders.***

Chapter IV

ABBANK'S PUBLIC COMMUNICATIONS AND STATEMENTS

Article 18. Purpose and content of requirements for public speaking and communication

18.1. Public statements and communications must aim to promote and introduce ABBANK's products, services, reputation, image, capacity and operations; protect the legitimate and

³³ Article 4.4 Circular 68/2024/TT-BTC

³⁴ Article 48.7, Article 49 Law on Credit Institutions; Article 164.2 Law on Enterprises; Article 291.3 và Article 299 Decree 155/2020/NĐ-CP;

legal rights and interests of customers and ABBANK; guide public opinion to help the public and the social community have sufficient necessary information, correctly understand the nature of the problem; objectively, truthfully and sympathetically evaluate ABBANK; support ABBANK to continuously improve and develop; prevent and handle false information that affects ABBANK;

18.2. The content of information communicated and communicated to the public must reflect ABBANK's official stance on that issue and must be consistent with the purpose of statements and communications specified in Clause 18.1 of this Article and not contradict the content of information published according to the provisions of Chapter II of this Regulation on the same issue;

18.3. The following acts are prohibited:

- a) Speaking or disclosing information that is state secret, business secret, technology and other confidential information of ABBANK, customer account and transaction information, except in cases where information must be provided to competent state agencies as prescribed by law;
- b) Speaking or providing false information, causing misunderstanding or causing negative impact on ABBANK;
- c) Arbitrarily speaking or providing information on behalf of ABBANK that is contrary to this Regulation and other relevant internal regulations of ABBANK

18.4. The statements of ABBANK officers and employees as individuals/experts must comply with the following regulations:

- a) Not to include information identifying that the officer or employee is working at ABBANK;
- b) Not to violate the provisions in Clause 18.3 of this Article;
- c) Encourage implementation of the provisions in Clause 18.1 and Clause 18.2 of this Article;
- d) Take personal responsibility for the content of the statements.

Article 19. Authority and form of public speaking and communication

19.1. Persons authorized to speak for ABBANK include:

- a) Chairman of the BOD, legal representative;
- b) General Director;
- c) Persons authorized to disclose information as prescribed in Clause 6.1, Article 6 of this Regulation;
- d) Persons assigned by the General Director to speak;
- e) Persons authorized by the Chairman of the BOD, General Director to speak in specific cases.

19.2. The authorized spokesperson is responsible before the law and before the competent authority for the information he/she speaks and provides to the press.

Code: QC.PR.001

19.3. Except for providing information in accordance with the content of the information disclosure document implemented in accordance with the provisions of Chapter II of this Regulation, speaking, providing information and communicating to the public related to the following contents must be reported to the Chairman of the BOD before implementation:

- a) Contents of periodic and ad hoc information disclosure as prescribed in Chapter II of this Regulation, except in cases where the content of such information disclosure has been authorized by the Chairman of the BOD;
- b) Contents of meetings, activities, decisions, responsibilities, and authority of the General Meeting of Shareholders, the BOD, and the BOD' Committees;
- c) Shareholders, shares; offering, issuance of shares, convertible bonds, treasury stock transactions, public tender offers, increase, decrease of charter capital; dividends;
- d) Legal rights and interests, responsibilities and actions of ABBANK in disputes, events, incidents, and risks;
- e) Recruitment, appointment, dismissal, removal, transfer, discipline and responsibilities of Internal Persons or information related to senior personnel of ABBANK;
- f) Handling of communication incidents;
- g) Other issues as requested by the Chairman of the BOD or General Director, spokesperson, authorized person to disclose information/speak, provide information or the Information Disclosure Unit that deems it necessary to report to the Chairman of the BOD before making a statement or providing information.

19.4. Public communication must be carried out through a single focal point, the **Marketing Division**. Units and individuals who need to promote information to the public or have a request for press response must contact and follow the instructions of the **Marketing Division**.

19.5. The **Marketing Division** is responsible for speaking and providing information to the press specifically as follows:

- a) Advise, consult, prepare press releases;
- b) Guide the implementation of statements, provide information to the outside;
- c) Preside over and coordinate with relevant units and individuals to propose contingency plans, solutions to handle and overcome communication incidents when they arise;
- d) Proactively establish and maintain contact channels, interact with the press, electronic information pages, social networking forums to carry out public communication purposes;
- e) Regularly monitor and synthesize public opinion and press situations to coordinate with relevant units to propose response content, overcome negative impacts on the reputation and image of ABBANK;

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- f) Coordinate to advise, propose, prepare content to request relevant press agencies, organizations and individuals to make corrections, overcome consequences when posting inaccurate and untrue information about ABBANK.

19.6. Public speaking, information provision and communication to the public shall be carried out in the following forms:

- a) Press releases;
- b) Newspaper articles, image clips, audio files;
- c) Press conferences/Interviews;
- d) Other appropriate forms.

19.7. The General Director shall promulgate the Procedures for public speaking and information provision to the press and provide guidance on the implementation of the provisions in this Chapter.

Chapter V

IMPLEMENTATION ORGANIZATION

Article 20. Effectiveness and implementation

20.1. This Regulation takes effect from the date of issuance and replaces the Regulation on Information Disclosure issued together with Decision No. 132/QĐ-HĐQT.21 dated June 11, 2021 of the BOD.

20.2. During the implementation process, if issues arise that are not regulated in this Regulation or there are changes in the law or forms that have not been amended or supplemented in a timely manner, leading to the provisions of this Regulation being inconsistent/inconsistent with the provisions of the law on the same issue, information disclosure shall be carried out in accordance with the provisions of the laws.

20.3. The General Director is responsible for organizing the implementation of this Regulation./.