

No. 31/2026/NQ-BSH-HĐQT

Hanoi, 29/06/2026

RESOLUTION

Promulgation of the Information Disclosure Regulation of Sai Gon – Ha Noi
Insurance Joint Stock Corporation

THE BOARD OF DIRECTORS

SAIGON - HANOI INSURANCE JOINT STOCK CORPORATION (BSH)

- Pursuant to the Law on Enterprises No. 59/2020/QH14 dated June 17, 2020 and its implementing, amending and supplementing documents;
- Pursuant to the Law on Insurance Business No. 08/2022/QH15 dated June 16, 2022 and its implementing, amending and supplementing documents;
- Pursuant to the Law on Securities No. 54/2019/QH14 dated November 26, 2019 and its implementing, amending and supplementing documents;
- Pursuant to the Charter of Sai Gon – Ha Noi Insurance Joint Stock Corporation (BSH);
- Pursuant to the Minutes of the Board of Directors Meeting No. 08/2026/BB-BSH-HĐQT dated 25/06/2026.

HEREBY RESOLVES

Article 1: To approve and promulgate, together with this Resolution, the "*Information Disclosure Regulation of Sai Gon – Ha Noi Insurance Joint Stock Corporation*".

Article 2: To assign and authorize the General Director to organize the implementation of the Regulation upon its promulgation, disseminate it to all Insiders and relevant units, and to further delegate such authority to other Managers of BSH for execution.

Article 3: This Resolution takes effect from the date of signing. Members of the Board of Directors, Executive Management, Directors of Divisions/Units, and all relevant individuals of BSH are responsible for implementing this Resolution.

Recipients:

- As per Article 3;
- Board of Supervisors (for information);
- Archived: General Office, BOD Office.

ON BEHALF OF THE BOARD OF
DIRECTORS
CHAIRMAN

KIM KANG WOOK

This is an English translation of the original Vietnamese Resolution.

In the event of any discrepancy or difference in interpretation between the English and Vietnamese versions, the Vietnamese version shall prevail.

**INFORMATION DISCLOSURE REGULATION
OF SAIGON – HANOI INSURANCE JOINT STOCK CORPORATION**
*(Attached to Resolution No. 31/2026/NQ-BOD dated 29/06/2026 of the Board of
Directors)*

ARTICLE 1. SCOPE OF APPLICATION

This Information Disclosure Regulation ("IDR") applies to all Insiders of the Company and their Related Parties, Related Parties of the Company, Major Shareholders, branches, subsidiaries and affiliated units of the Company, all Departments/Divisions at the head office, and all employees of the Company.

ARTICLE 2. LEGAL BASIS

1. The Law on Enterprises No. 59/2020/QH14 adopted by the National Assembly of the Socialist Republic of Vietnam on June 17, 2020, and its implementing, amending, and supplementary documents;
2. The Law on Securities No. 54/2019/QH14 adopted by the National Assembly of the Socialist Republic of Vietnam on November 26, 2019, and its implementing, amending, and supplementary documents;
3. Decree No. 155/2020/ND-CP dated December 31, 2020, issued by the Government detailing the implementation of certain provisions of the Law on Securities, and its implementing, amending, and supplementary documents;
4. Circular No. 96/2020/TT-BTC dated November 16, 2020, issued by the Ministry of Finance guiding information disclosure in the securities market, and its implementing, amending, and supplementary documents.

ARTICLE 3. DEFINITIONS

1. **"BSH"** or **"the Company"** refers to Saigon – Hanoi Insurance Joint Stock Corporation;
2. **"the Regulation"** refers to the Information Disclosure Regulation;
3. **"Insiders of the Company"** means the Chairperson of the Board of Directors, members of the Board of Directors, legal representatives, the General Director, Deputy General Directors, the Chief Accountant, and equivalent managerial positions elected by the General Meeting of Shareholders or appointed by the Board of Directors; the Head of the Supervisory Board and its members (Supervisors); the Company Secretary, the person in charge of corporate governance, and the authorized information discloser;
4. **"Major Shareholder"** means a shareholder holding 5% or more of the voting shares of the Company;



5. **“Related Party”** means an individual or organization that has a relationship with another in any of the following circumstances:
 - a) An enterprise and its insiders;
 - b) An enterprise and any organization or individual holding more than 10% of voting shares or contributed capital of that enterprise;
 - c) An organization or individual that directly or indirectly controls, is controlled by, or is under common control with another organization or individual;
 - d) An individual and their biological father, biological mother, adoptive father, adoptive mother, father-in-law, mother-in-law, spouse, biological children, adopted children, children-in-law, and siblings (including siblings-in-law) of that individual;
 - e) A contractual relationship in which one organization or individual acts as an agent for another;
 - f) Any other organization or individual deemed a related party under the Law on Enterprises.
6. **“Disclosure Date”** means the date on which information appears on any of the disclosure channels specified in Clause 1, Article 5 of this Regulation;
7. **“Reporting Date for Information Disclosure”** means the date of fax transmission, electronic data transmission via email, the date the **information** is received on the information system of the State Securities Commission, or the date the Stock Exchange receives the written disclosure report, whichever comes first.
8. **“Information Provider”** means the Directors/Deputy Directors overseeing the respective Departments, and all officers and employees of the Company.
9. **“Information Disclosure Unit”** means the Department or individual assigned the responsibility of information disclosure as designated by the competent authority from time to time.

ARTICLE 4. PRINCIPLES OF INFORMATION DISCLOSURE

1. Information disclosure (“ID”) must be complete, timely, and accurate in accordance with applicable law. In the event of any change to previously disclosed information, the Company must promptly and fully disclose the nature of and reasons for such change.
2. Information disclosure by the Company must be carried out by its legal representative or authorized discloser (“Authorized Discloser”). The legal representative shall be accountable for the content of information disclosed by the Authorized Discloser.
3. The Company must notify and update the State Securities Commission (“SSC”) and the Stock Exchange (“SE”) on the designated discloser within 24 hours from the effective date of any appointment, authorization, or change. The required

- information shall include: the Power of Attorney for Disclosure, the Information Submission Form, and other relevant documents (if any);
4. Disclosure of personal information — including Citizens' ID cards, military ID cards, valid passports, contact addresses, permanent residences, phone numbers, fax numbers, email addresses, securities trading account numbers, securities depository account numbers, bank account numbers, and transaction codes for foreign investors or foreign-invested economic organizations holding more than 50% of the charter capital — shall only be made with the consent of the individual concerned.

ARTICLE 5. REQUIREMENTS FOR INFORMATION DISCLOSURE

1. Information disclosure must be conducted within the legally prescribed timeframes, using forms approved by the competent authority, and submitted through the required channels at each relevant time;
2. Information disclosure must ensure truthfulness, objectivity, completeness, accuracy, and timeliness.

ARTICLE 6. CIRCUMSTANCES FOR INFORMATION DISCLOSURE

1. The Company shall disclose information in the following circumstances:
 - a) Periodic information disclosure
 - b) Extraordinary information disclosure
 - c) Information disclosure at the request of the State Securities Commission or the Stock Exchange where the Company is listed
 - d) Other circumstances as required by applicable law.
2. The specific requirements for each disclosure circumstance shall be governed by the Law on Securities and other applicable legal documents.
3. Where necessary and within their authority, the Vice Chairperson of the Board of Directors may, personally or by delegation to subordinate personnel, issue internal guidance documents on information disclosure consistent with applicable law from time to time.

ARTICLE 7. RESPONSIBILITIES OF THE INFORMATION PROVIDER

1. Is responsible for providing information to the Information Disclosure Unit whenever a matter requiring disclosure arises.
2. Is accountable to the General Director and to the Company for the accuracy and timeliness of all information provided to the Information Disclosure Unit.

ARTICLE 8. RESPONSIBILITIES OF THE INFORMATION DISCLOSURE UNIT

1. Carry out information disclosure fully and in compliance with applicable law and this Regulation.

2. Proactively coordinate with relevant Departments to ensure information disclosure in accordance with applicable requirements.
3. Other responsibilities as assigned by the competent authority.

ARTICLE 9. CHANNELS AND METHODS OF INFORMATION DISCLOSURE

1. Information Disclosure Channels

Information disclosure shall be conducted through one, some, or all of the following channels:

- a) The Company's official website;
- b) The SSC's information disclosure system (as stipulated from time to time);
- c) The Stock Exchange's website and other disclosure channels as regulated by the Stock Exchange;
- d) The website of the Vietnam Securities Depository and Clearing Corporation ("VSDC") (when filing reports or disclosures);
- e) Other mass media channels as permitted by law (print media, online media, etc.).

2. Forms of Information Disclosure

- a) Information for disclosure purposes shall be submitted in paper form and/or electronic form as required by the SSC and the Stock Exchange at each relevant time, specifically:
 - Paper documents are printed copies bearing the signature of the Authorized Discloser and the Company's official seal;
 - Electronic documents are documents presented in the form of data messages. Electronic documents must be digitally signed before being attached to emails and shall have the same legal validity as paper documents.
- b) Information disclosure may also be carried out via the software or online portal designated by the SSC/Stock Exchange from time to time. Individuals or units assigned to disclose information through such systems must adhere to the following principles:
 - Maintain the confidentiality of registered credentials, including usernames and passwords, used for submitting disclosures to the SSC/Stock Exchange;
 - Carry out information disclosure strictly in accordance with the instructions of the SSC/Stock Exchange.

3. Information Disclosure via the Company's Official Website:

- a) Official website address for information disclosure: <https://bshc.com.vn/>
- b) The Company is obligated to notify the SSC and the Stock Exchange within 03 working days of any change to the website address or any related changes;

- c) The Company’s website must include information on its business sector and any content required by law to be publicly disclosed;
 - d) The Company’s website must maintain a dedicated Investor Relations section, which must include at minimum the following:
 - The Company’s Charter;
 - The Information Disclosure Regulation;
 - Internal Corporate Governance Regulation;
 - Operating Regulations of the Board of Directors and the Supervisory Board;
 - Prospectus (if applicable);
 - Periodic, extraordinary, on-request disclosures, and other activities required by applicable law.
 - e) The Company’s website must display the date and time of each disclosure. Periodic, extraordinary, and on-request disclosures may be arranged chronologically but must be centrally archived in the Investor Relations section for ease of reference.
 - f) All periodic, extraordinary, and on-request disclosures must be submitted to the Information Disclosure Unit.
4. Information Disclosure in English
- Information disclosure in English shall be carried out in accordance with applicable law from time to time. English disclosures must be consistent with the Vietnamese-language versions. In the event of any discrepancy or difference in interpretation between the Vietnamese and English versions, the Vietnamese version shall prevail.

ARTICLE 10. PROVIDING INFORMATION TO MASS MEDIA

- 1. Media Interviews
 - a) The provision of information to mass media and the granting of interviews on matters relating to the Company’s operations must be conducted by the legal representative or by a person duly authorized by the legal representative. Where such information may affect the Company’s share price, information disclosure must be made simultaneously with the media communication or immediately after the authorized person has given an interview.
 - b) If a Company employee is personally invited to give an interview on matters related to the Company’s operations, they must report to the General Director prior to the interview (or immediately afterward if prior reporting is not feasible), and must clearly state during the interview that their views are personal opinions.
- 2. Correction of Inaccurate Media Reporting about the Company

- a) Upon discovering inaccurate media coverage about the Company, all employees are responsible for immediately notifying the legal representative and the person in charge of Marketing/Communications for prompt action;
- b) The person in charge of Marketing/Communications shall coordinate with the relevant specialized Departments to verify the accuracy of the information and submit a proposed course of action to the legal representative within 24 hours of discovering the inaccuracy.
- c) The Company shall proactively issue a corrective disclosure and simultaneously request that the party responsible for the inaccurate reporting issue a correction and rectify the erroneous content.
- d) The corrective disclosure process shall follow the same procedure as extraordinary disclosures: disclosure must be made within 24 hours of discovering the inaccuracy.

ARTICLE 11. DEFERRAL OF INFORMATION DISCLOSURE

In the event that information disclosure cannot be made within the prescribed timeframe due to force majeure, the unit responsible for disclosure must promptly draft an official letter requesting a deferral, have it signed by the Authorized Discloser, and submit it to the SSC and the Stock Exchange as soon as the event occurs. The letter must clearly state the reasons for the deferral. The Company must also publicly announce the deferral and carry out the disclosure immediately once the force majeure event has been remedied.

ARTICLE 12. STORAGE AND RETENTION OF DISCLOSED INFORMATION

The Company is responsible for retaining and storing disclosed information as follows:

1. Periodic disclosures and corporate registration information must be retained in paper form (where applicable) and in electronic format for a minimum of 10 years. Such information must be published, stored, and accessible on the Company's website for a minimum of 05 years;
2. Extraordinary disclosures, on-request disclosures, and other disclosures must be published, stored, and accessible on the Company's website for a minimum of 05 years.

ARTICLE 13. IMPLEMENTING PROVISIONS

1. In the course of implementation, if any new issues arise that necessitate amendments or additions to this Regulation in order to align with applicable law and practical requirements, the Company shall submit the proposed changes to the Board of Directors for consideration.

2. To the extent that any provisions of the Company's Charter or applicable law relating to information disclosure are not addressed in this Regulation, such provisions shall automatically apply and govern the Company's information disclosure activities.

This is the English translation of the Information Disclosure Regulation. In the event of any discrepancy or difference in interpretation between the English and Vietnamese versions, the Vietnamese version shall prevail.

