

No.: 360/QĐ-XPHC

Hanoi, 30 June 2026

DECISION

On the Imposition of an Administrative Penalty

THE DEPUTY CHIEF INSPECTOR OF THE STATE SECURITIES COMMISSION

Pursuant to Articles 57, 68, 70, 78 and 85 of the Law on Handling of Administrative Violations No. 15/2012/QH13, as amended and supplemented by Law No. 67/2020/QH14 and Law No. 88/2025/QH15;

Pursuant to Government's Decree No. 118/2021/ND-CP dated 23 December 2021 detailing a number of articles of and measures for implementation of the Law on Handling of Administrative Violations, as amended and supplemented by Decree No. 68/2025/ND-CP and Decree No. 190/2025/ND-CP;

Pursuant to Government's Decree No. 189/2025/ND-CP dated 1 July 2025 detailing the Law on Handling of Administrative Violations regarding the authority to impose administrative penalties;

Pursuant to Government's Decree No. 156/2020/ND-CP dated 31 December 2020 on administrative sanctions for violations in the securities and securities market sector, as amended and supplemented by Decree No. 306/2025/ND-CP;

Pursuant to the Administrative Violation Record No. 46/BB-VPHC dated 18 June 2026;

Pursuant to Decision No. 01/QĐ-GQXP dated 5 January 2026 of the Chief Inspector of the State Securities Commission on the delegation of authority to impose administrative penalties;

HEREBY DECIDES:

Article 1.

1. To impose an administrative penalty on the following organization:

Name of violating organization: Top One Allot Joint Stock Company

Head office address: Hamlet 19, Vi Xuyen Commune, Tuyen Quang Province, Viet Nam

Enterprise Registration Certificate/Enterprise Registration Number: 0106121967; first issued on 11 March 2013; amended for the 16th time on 23 September 2025; issued by the Department of Finance of Tuyen Quang Province.

Legal representative: Nguyen Ngoc Duong

Gender: Male

Position: Chairman of the Board of Directors



2. Administrative violation committed: Violation of regulations on information disclosure deadlines (Top One Allot Joint Stock Company failed to disclose information within the prescribed time limits (CBTT), with delays of 15 days or more for the following documents: Audited Annual Financial Statements (BCTC) for 2023, 2024 and 2025; Quarter IV Financial Statements for 2023; Quarter I, Quarter II, Quarter III and Quarter IV Financial Statements for 2024; Quarter I, Quarter II and Quarter III Financial Statements for 2025; Reviewed Semi-Annual Financial Statements for 2024 and 2025; Explanation of the variance exceeding 10% and the post-tax loss in the audited 2023 Financial Statements; Explanation of the change in post-tax profit from loss to profit in the Quarter IV 2024 Financial Statements; Explanation of the post-tax loss and the change from profit to loss in the Quarter I 2025 Financial Statements; English explanation of the variance exceeding 10%, the change in post-tax profit from profit to loss, and the variance exceeding 5% between pre-audit and post-audit post-tax profit in the reviewed Semi-Annual Financial Statements for 2025; Explanation of the change in post-tax profit from loss to profit in the Quarter III 2025 Financial Statements; Explanation of the variance exceeding 10% and the post-tax loss in the Quarter IV 2025 Financial Statements; English explanation of the variance exceeding 10%, the change in post-tax profit from profit to loss, and the variance exceeding 5% between pre-audit and post-audit post-tax profit in the audited Annual Financial Statements for 2025; English explanation of the variance exceeding 10%, explanation of the post-tax loss in the Quarter I 2026 Financial Statements; Extraordinary information disclosure relating to the Audit Contract Liquidation Minutes No. 1501.1/2024/BBTL-UHYHN dated 15 January 2024).

3. Legal basis

Point b, Clause 4, Article 42 of Decree No. 156/2020/ND-CP, as amended and supplemented under Clause 16, Article 1 of Decree No. 306/2025/ND-CP.

4. Aggravating circumstance

Repeated commission of administrative violations, as prescribed in Point b, Clause 1, Article 10 of the Law on Handling of Administrative Violations.

5. Mitigating circumstance: None.

6. Penalty and remedial measures

a) Principal penalty: A monetary fine.

Amount: 92,500,000 VND (in words: Ninety-two million five hundred thousand Vietnamese Dong).

b) Additional penalty: None.

c) Remedial measure: None.

Article 2. This Decision shall take effect from the date of signing.



Article 3. This Decision shall be:

1. Served on Mr. Nguyen Ngoc Duong, the legal representative of the organization sanctioned under Article 1 of this Decision, for implementation.

Top One Allot Joint Stock Company shall strictly comply with this Decision. Should the Company fail to voluntarily comply within the prescribed time limit, compulsory enforcement measures shall be taken in accordance with law. In addition, for each day of late payment, the Company shall pay an additional amount equal to 0.05% of the outstanding fine.

The Company shall pay the fine to State Treasury Region I, at: No. 18 Giai Phong Road, Kim Lien Ward, Hanoi City, or transfer the fine to Account No. 7111 of State Treasury Region I, within 10 days from the date of receipt of this Decision.

Top One Allot Joint Stock Company shall have the right to lodge a complaint or institute an administrative lawsuit against this Decision in accordance with the law.

2. Sent to State Treasury Region I for collection of the administrative fine.

3. Sent to Mr. Phung Quang Truong - Specialist of the State Securities Inspectorate for implementation./.

Recipients:

- As specified in Article 3;
- Chairperson (for reporting);
- Chief Inspector (for reporting);
- Public Company Supervision Department (for information);
- Hanoi Stock Exchange (for information);
- Archived: Administration Office, Case File (09b).

**FOR THE CHIEF INSPECTOR
DEPUTY CHIEF INSPECTOR**



Nguyen Thi Hong Nhung