

**SONG BE RUBBER
JOINT STOCK COMPANY**

Regarding the promulgation of
the Information Disclosure
Regulations.

THE SOCIALIST REPUBLIC OF VIETNAM
Independence - Freedom – Happiness

Chon Thanh, August 14, 2026.

INFORMATION DISCLOSURE

To:

- State Securities Commission;
- Hanoi Stock Exchange.

I. INFORMATION OF ORGANIZATION

- Name of the company: SONG BE RUBBER JOINT STOCK COMPANY.
- Stock symbol: SBR
- Address of head office: DT 751, Minh Thanh 3 Quarter, Chon Thanh ward, Dong Nai city.
- Phone number: 02713640502; Fax: 02713667260;
- Website: www.caosusongbe.vn

II. INFORMATION DISCLOSURE PERSON

- Full name: Mr. Huynh Quang Vinh.
- Address: Le Quy Don street, Tan Xuan Quarter, Binh Phuoc ward, Dong Nai city.
- Phone number: 0913880074.

III. CONTENTS OF INFORMATION DISCLOSURE

Information disclosure type: Abnomal.

Contents of information disclosure: On August 14, 2026, the Board of Directors of Song Be Rubber Joint Stock Company issued Resolution No. 13 /NQ-HĐQT on the promulgation of the Information Disclosure Regulations of Song Be Rubber Joint Stock Company.

The information was published on the company's website on August 14, 2026 at the following link: www.caosusongbe.vn

We hereby certify that the information published above is true and take full legal responsibility for the content of the published information./.

Recipients:

As above;
Board of Directors, Supervisory
Board, Board of Management;
Archived at the Administration
Office and Finance & Accounting
Department.

**PERSON AUTHORIZED TO INFORMATION
DISCLOSURE**

CHIEF ACCOUNTANT



Huynh Quang Vinh

RESOLUTION

Regarding the issuance of the Regulations on Information Disclosure

**THE BOARD OF DIRECTORS
OF SONG BE RUBBER JOINT STOCK COMPANY**

Pursuant to the Law on Enterprises dated June 17, 2020;

Pursuant to the Law on Securities No. 54/2019/QH14 dated November 26, 2019;

Pursuant to the Government's Decree No. 155/2020/ND-CP dated December 31, 2020 on detailing the implementation of a number of articles of the Law on Securities, as amended and supplemented by Decree No. 245/2025/NĐ-CP dated September 11, 2025 of the Government;

Pursuant to Circular No. 96/2020/TT-BTC dated November 16, 2020 of the Ministry of Finance guiding information disclosure on the securities market, as amended by Circular No. 68/2024/TT-BTC dated September 18, 2024;

Pursuant to Decision No. 21/QĐ-SGDVN dated December 21, 2021 of the Vietnam Stock Exchange;

Pursuant to Decision No. 17/QĐ-HĐTV dated March 31, 2022 of the Member Council of the Vietnam Stock Exchange;

Pursuant to the Charter on organization and operation of Song Be Rubber Joint Stock Company;

Pursuant to the contents of the Minutes of the Meeting of the Board of Directors of Song Be Rubber Joint Stock Company No. 15./BB-HĐQT dated July 08., 2026.

The Board of Directors of Song Be Rubber Joint Stock Company hereby:

RESOLVES

Article 1. To approve the Company's Information Disclosure Regulation (as amended and supplemented for the second time) to ensure compliance with current legal regulations and alignment with the Company's actual operational situation.

Article 2. The Information Disclosure Regulation shall be issued effective from the date of signing and shall supersede all previously issued Information Disclosure Regulations.

Article 3. Members of the Board of Directors, the Board of Management, the Supervisory Board, heads of departments and units, and relevant individuals shall implement this Resolution in accordance with the prescribed personnel procedures. /.

Recipients:

- As stated in Article 3;
- Archived at Administration Office.

**ON BEHALF OF THE BOARD OF DIRECTORS
CHAIRMAN**



Chai Công Cẩn

DECISION

Regarding the issuance of the Regulations on Information Disclosure

**THE BOARD OF DIRECTORS
OF SONG BE RUBBER JOINT STOCK COMPANY**

Pursuant to the Law on Enterprises dated June 17, 2020 and its relevant guiding documents;

Pursuant to the Law on Securities No. 54/2019/QH14 dated November 26, 2019;

Pursuant to the Government's Decree No. 155/2020/ND-CP dated December 31, 2020 on detailing the implementation of a number of articles of the Law on Securities, as amended and supplemented by Decree No. 245/2025/ND-CP dated September 11, 2025 of the Government;

Pursuant to Circular No. 96/2020/TT-BTC dated November 16, 2020 of the Ministry of Finance guiding information disclosure on the securities market, as amended by Circular No. 68/2024/TT-BTC dated September 18, 2024;

Pursuant to Decision No. 21/QĐ-SGDVN dated December 21, 2021 of the Vietnam Stock Exchange;

Pursuant to Decision No. 17/QĐ-HĐTV dated March 31, 2022 of the Member Council of the Vietnam Stock Exchange;

Pursuant to the Charter on organization and operation of Song Be Rubber Joint Stock Company;

Pursuant to Resolution No.13NQ/HĐQT dated August 14, 2026 of the Board of Directors of Song Be Rubber Joint Stock Company on approving the Regulations on Information Disclosure of Song Be Rubber Joint Stock Company,

DECISION

Article 1. Promulgating the Regulation on Information Disclosure of Song Be Rubber Joint Stock Company (as amended and supplemented for the second time) to ensure compliance with current legal regulations and alignment with the Company's actual operational situation, which was approved by the Board of Directors under Resolution No. 13/NQ-HĐQT dated August 14, 2026 of the Board of Directors of Song Be Rubber Joint Stock Company (the full text of the amended and supplemented Regulation is attached to this Decision).

Article 2. Members of the Board of Directors, the Board of Management, the Supervisory Board, heads of departments and units, and relevant individuals shall implement this Resolution in accordance with the prescribed personnel procedures. This Resolution shall take effect from the date of signing.

This Decision replaces Decision No.13/QĐ-CSSB-HĐQT dated August 09, 2021 of the Board of Directors of Song Be Rubber Joint Stock Company.

Recipients:

- As stated in Article 2;
- Archived at Administration Office;
- Website.

**ON BEHALF OF THE BOARD OF DIRECTORS
CHAIRMAN**



Chai Công Cần

REGULATION ON INFORMATION DISCLOSURE

(Issued together with Decision No. ~~46~~/QĐ-HĐQT dated August ~~14~~..., 2026 of the Board of Directors of Song Be Rubber Joint Stock Company)

Chapter I

GENERAL PROVISIONS

Article 1. Scope and subjects of application

1. This Regulation governs the fulfillment of information disclosure obligations on the Vietnamese securities market. It stipulates the obligations regarding the disclosure of information concerning the operations of Song Be Rubber Joint Stock Company (hereinafter referred to as the "Company") to competent authorities, as well as disclosure on the securities market and via mass media in accordance with the law. It also prescribes the coordination of working relationships among the Company's departments, affiliated units, and individuals regarding the fulfillment of information disclosure obligations.

2. Subjects of application: Members of the Board of Directors (BOD); the Supervisory Board (SB); the Board of Management; the Chief Accountant; Heads of relevant professional departments; the person(s) responsible for information disclosure; Company insiders and persons related to insiders; shareholders; investors subject to information disclosure requirements under the law; and individuals involved in the information disclosure process.

Article 2. Legal grounds

Pursuant to the Law on Enterprises No. 59/2020/QH14 dated June 17, 2020;

Pursuant to the Law on Securities No. 54/2019/QH14 dated November 26, 2019;

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, as amended and supplemented by Decree No. 245/2025/ND-CP dated September 11, 2025 of the Government;;

Pursuant to Circular No. 96/2020/TT-BTC dated November 16, 2020 of the Ministry of Finance;

Pursuant to Circular No. 68/2024/TT-BTC dated September 18, 2024 of the Ministry of Finance;



Pursuant to Decision No. 21/QĐ-SGDVN dated December 21, 2021 of the Vietnam Stock Exchange;

Pursuant to Decision No. 17/QĐ-HĐTV dated March 31, 2022 of the Member Council of the Vietnam Stock Exchange;

Pursuant to the Charter on Organization and Operation and the Internal Regulations on Corporate Governance of the Company.

Article 3. Definitions

In this Regulation, the following terms shall be understood as follows:

1. "Company" means Song Be Rubber Joint Stock Company.
2. "Regulation" means this Regulation on information disclosure.
3. Investors subject to information disclosure requirements include:
 - a) Insiders of a public company as prescribed in Clause 45, Article 4 of the Law on Securities, and related persons of such insiders;
 - b) Major shareholders or groups of related persons holding 5% or more of the voting shares of a public company; investors or groups of related persons holding 5% or more of the fund certificates of a closed-end fund;
 - c) Founding shareholders during the transfer restriction period of a public company or a public securities investment company;
 - d) Groups of related foreign investors holding 5% or more of the voting shares of an issuer or 5% or more of the fund certificates of a closed-end fund;
 - d) Shareholders or groups of related persons purchasing shares to acquire an ownership stake of 5% or more of the voting shares of a public company; investors or groups of related persons purchasing fund certificates to acquire an ownership stake of 5% or more of the fund certificates of a closed-end fund;
 - e) Organizations or individuals conducting a public tender offer for shares of a public company or fund certificates of a target closed-end fund; the target company; and the fund management company of the target closed-end fund.
4. "Related persons" refers to the individuals and organizations specified in Clause 23, Article 4 of the Law on Enterprises and Clause 46, Article 4 of the Law on Securities.
5. "Date of information disclosure" is the date on which information appears on one of the information disclosure media specified in Clause 1, Article 6 of these Regulations.
6. Reporting date is the date of transmission via fax or email, the date information is received on the information disclosure system of the State Securities Commission or the information disclosure medium of the Stock Exchange, or the date the State Securities Commission or the Stock Exchange receives the written report, whichever occurs earliest.

7. An approved audit firm is an independent audit firm included in the list of audit firms approved by the State Securities Commission to conduct audits in accordance with the Law on Securities and regulations on independent auditing;

8. The date of a securities transaction is determined as follows:

a) The date of placing the trading order, in the case of a transaction executed via a Stock Exchange;

b) The date of registration to exercise subscription rights or to exercise the right to convert bonds into shares, in the case of exercising subscription rights or bond conversion rights;

c) The date on which the parties request the transfer of securities ownership, in the case of a transaction executed via the Vietnam Securities Depository and Clearing Corporation;

d) The date of submitting the auction participation form, in the case of a transaction executed via the auction method;

đ) The date on which the parties request the transfer at the issuing organization, in the case of a transaction not executed via the Vietnam Securities Depository and Clearing Corporation or a Stock Exchange.

9. The date of completion of a securities transaction is determined as follows:

a) The date of completion of transaction settlement, for transactions executed via a Stock Exchange;

b) The date of completion of transaction settlement, for transactions involving the exercise of subscription rights;

c) The date of completion of the conversion of bonds into shares, as notified by the issuing organization;

d) The effective date of the transfer of securities ownership at the Vietnam Securities Depository and Clearing Corporation, for transactions executed via the Vietnam Securities Depository and Clearing Corporation;

đ) The date of completion of payment for share purchases, as notified by the organization conducting the share auction, for transactions executed via auction;

e) The date on which the issuing organization confirms the validity of the securities transfer, for transactions not executed via the Vietnam Securities Depository and Clearing Corporation or a Stock Exchange.

Article 4. Principles of information disclosure

1. Information disclosure by an organization shall be carried out by its legal representative or an authorized person. Information disclosure by an individual shall be carried out by that individual or by another organization or individual authorized by them. The disclosure of information by the person responsible for such disclosure is specifically prescribed in Article 5 of this Regulation.

2. Information disclosure by the Company must be complete, accurate, and timely in accordance with the law and must ensure the following:

a. The disclosing entity shall be responsible for the content of the disclosed information. In the event of any change to the content of previously disclosed information, the disclosing entity must disclose the changed content and the reason for the change;

b. In the event of an occurrence or information affecting securities prices, the disclosing entity must confirm or rectify such occurrence or information within 24 hours of becoming aware of it, or upon the request of the State Securities Commission (SSC) or the Stock Exchange;

c. The disclosure of personal information including Citizen Identity Card numbers or valid passport numbers, contact addresses, permanent residence addresses, telephone numbers, fax numbers, email addresses, securities trading account numbers, securities depository account numbers, and bank account numbers shall only be carried out with the consent of the relevant individual.

3. When disclosing information, the entities specified in Clause 2, Article 1 of this Regulation must simultaneously report the content of the disclosed information including all prescribed details to the State Securities Commission and the Stock Exchange where the securities are listed or registered for trading. In cases where the disclosed information includes personal details specified in Clause 1 of this Article and the disclosing entities do not consent to the public release of such details, they must submit two sets of documents to the State Securities Commission and the Stock Exchange: one set containing the full personal details and another set excluding them, so that the State Securities Commission and the Stock Exchange may proceed with the public disclosure.

4. Entities subject to information disclosure requirements are responsible for preserving and retaining the information disclosed and reported in accordance with this Regulation, as follows:

a) Information disclosed on a periodic basis and information regarding public company registration must be retained in both hard copy (if applicable) and electronic data formats for a minimum of 10 years. Such information must be maintained and accessible on the disclosing entity's website for a minimum of 05 years;

b) Information disclosed on an extraordinary or ad-hoc basis, information disclosed upon request, and information regarding other activities must be maintained and accessible on the disclosing entity's website for a minimum of 05 years.

Article 5. Language for information disclosure in the securities market

From January 1, 2025, companies must disclose periodic information in both Vietnamese and English simultaneously.

From January 1, 2026, companies must disclose extraordinary information, information upon request, and information regarding other corporate activities in both Vietnamese and English simultaneously; the information disclosed in English must be consistent with the content of the information disclosed in Vietnamese. In the event of any discrepancy or difference in interpretation between the information in Vietnamese and English, the information in Vietnamese shall prevail (Clause 1, Article 5, Circular 68).

Article 6. Persons responsible for information disclosure

1. The person responsible for information disclosure of the Company is the Legal Representative, who holds the highest authority and bears comprehensive responsibility for information disclosure within the Company.

a) The Company's Legal Representative may authorize, in writing and using the form specified in Appendix 01 of Circular 96/2020/TT-BTC, (i) the Authorized Person for information disclosure, and/or (ii) the General Director.

b) The Legal Representative bears responsibility for the completeness, accuracy, and timeliness of information disclosed by the Authorized Person for information disclosure. In the event that an information disclosure obligation arises while both the Legal Representative and the Authorized Person for information disclosure are absent, the member of the Executive Board holding the highest position shall be responsible for carrying out the information disclosure. In cases where more than one person holds the highest position, the remaining members of the Executive Board must elect or designate one person to be responsible for information disclosure.

c) The company shall register or re-register its legal representative and the person authorized to disclose information along with the information disclosure forms for these individuals as prescribed in Appendix 03 of Circular 96/2020/TT-BTC with the State Securities Commission and the Stock Exchange at least 24 hours before the authorization takes effect.

2. An individual investor subject to information disclosure obligations may either fulfill these obligations personally or authorize an organization (such as a securities company, public company, securities depository, or other entity) or another individual to perform them, as follows:

a) In the event of personally fulfilling information disclosure obligations, the individual investor must, upon the first disclosure, submit to the State Securities Commission and the Stock Exchange an information disclosure form in accordance with the template prescribed in Appendix III of Circular 96/2020/TT-BTC; the investor is also responsible for providing accurate, timely, and complete information regarding any changes to the contents of the aforementioned form;

b) In cases where the disclosure of information is authorized, the individual investor shall be responsible for the completeness, accuracy, and timeliness of the information disclosed by the authorized person. The investor is responsible for providing accurate, timely, and complete information regarding their securities

ownership status and relationships with related persons (if any) to the organization or individual authorized to disclose information, enabling them to fulfill ownership reporting and information disclosure obligations in accordance with the law;

c) Individuals must report and re-report information regarding the authorized person to the State Securities Commission and the Stock Exchange within 24 hours of the authorization taking effect. The reported information regarding the authorized person shall include: the power of attorney for information disclosure (using the form prescribed in Appendix II of Circular 96/2020/TT-BTC) and the information provision form (using the form prescribed in Appendix III of Circular 96/2020/TT-BTC, applicable where the authorized person is an individual).

Article 7. Means of information disclosure

1. Means for reporting and disclosing information include:

- a) The Company's website;
- b) The information disclosure system of the State Securities Commission;
- c) The website of the Stock Exchange, and other means of information disclosure in accordance with the regulations of the Stock Exchange;
- d) The website of the Vietnam Securities Depository and Clearing Corporation;
- đ) Other mass media channels as prescribed by law (print newspapers, online newspapers, etc.).

2. Information disclosure on the Company's website:

a) The Company shall report to the State Securities Commission and the Stock Exchange, and publicly announce the website address as well as any changes thereto, within 03 working days from the date of completion of the website setup or the date of any change to the website address.

b) The website must contain information regarding business lines and details required to be publicly disclosed on the National Business Registration Portal in accordance with the Law on Enterprise, as well as any changes thereto; it must also feature a dedicated section for shareholder (investor) relations, where the Company's Charter, internal governance regulations, prospectus (if any), and information subject to periodic, extraordinary, or statutory disclosure requirements are published;

c) The website must display the time of information posting and ensure that investors can easily search for and access the data available on the site.

3. In the event that an information disclosure obligation arises on a statutory holiday or day off, the Company shall disclose the information on its website and fully discharge its disclosure obligations in accordance with the law once such holiday or day off has ended.

Article 8. Deferral of information disclosure

1. An entity subject to information disclosure requirements may defer such disclosure in cases of force majeure, such as natural disasters, fires, war, epidemics, or other force majeure events. The entity must report the deferral to the State Securities Commission and the Stock Exchange immediately upon the occurrence of the event (clearly stating the reason for the deferral) and simultaneously announce the deferral.

2. Immediately after the force majeure situation has been resolved, the entity is responsible for fully disclosing the information that was previously undisclosed, in accordance with the law.

Chapter II

CONTENT OF INFORMATION DISCLOSURE BY SONG BE RUBBER JOINT STOCK COMPANY

Article 9. Periodic information disclosure

1. Annual financial statements

The Company must disclose its annual financial statements audited by an approved auditing firm in accordance with the following principles:

a) The financial statements must include all reports, appendices, and notes as required by the laws on corporate accounting;

b) The Company must disclose information regarding the audited annual financial statements, including the audit report on said financial statements and the Company's explanatory statement in cases where the auditing firm issues an opinion other than an unqualified opinion;

c) Deadline for disclosing annual financial statements: The Company must disclose the audited annual financial statements within 10 days from the date the auditing firm signs the audit report, but no later than 90 days from the end of the fiscal year.

2. Semi-annual financial statements

a) The company must disclose its semi-annual financial statements within 05 days from the date the auditing firm signs the review report, but no later than 45 days from the end of the first six months of the fiscal year.

b) The content of the disclosure regarding semi-annual financial statements shall be the same as that specified in Point a, Clause 1 of this Article.

c) Semi-annual financial statements must be reviewed in accordance with the standards on the review of financial statements. The full text of the semi-annual financial statements must be disclosed in its entirety, accompanied by the review conclusion and the company's explanatory statement in cases where the review conclusion is not an unmodified conclusion.

3. Quarterly financial statements

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a) Quarterly financial statements must be full-form interim financial statements prepared in accordance with the Accounting Standard on "Interim Financial Reporting" and the regulations specified in Point a, Clause 1 of this Article.

b) Deadline for disclosure of quarterly financial statements: The company must disclose its quarterly financial statements within 20 days from the end of the quarter. The company must disclose reviewed quarterly financial statements (if any) within 05 days from the date the auditing firm signs the review report, but no later than 45 days from the end of the quarter.

4. When disclosing the financial statements referred to in Clauses 1, 2, and 3 of this Article, the Company must simultaneously provide an explanation of the reasons if any of the following cases occur:

a) Profit after corporate income tax in the income statement for the reporting period changes by 10% or more compared to the corresponding period of the previous year;

b) Profit after tax for the reporting period results in a loss, or shifts from a profit in the corresponding period of the previous year to a loss in the current period, or vice versa;

c) Profit after tax for the reporting period shows a difference of 5% or more between pre-audit/pre-review and post-audit/post-review figures, or shifts from a loss to a profit or vice versa.

5. Annual Report

The company must prepare and disclose an annual report in accordance with the template prescribed in Appendix IV of Circular 96/2020/TT-BTC within 20 days from the date of disclosure of the audited annual financial statements, but no later than 110 days from the end of the fiscal year.

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

6. Report on Corporate Governance

The company must disclose information regarding the report on corporate governance in accordance with the template prescribed in Appendix V of Circular 96/2020/TT-BTC within 30 days from the end of the first six months of the year and the end of the calendar year.

7. Disclosure of information regarding the Annual General Meeting of Shareholders

a) At least 21 days prior to the opening date of the General Meeting of Shareholders, the Company must disclose information regarding the meeting on its own website and on the websites of the State Securities Commission and the Stock Exchange (in the case of a listed entity or an entity registered for trading). This disclosure must clearly state the link to all meeting documents, including: the

meeting invitation, the meeting agenda, voting ballots, documents to be used during the meeting, and draft resolutions for each item on the agenda. Meeting documents must be updated to reflect any amendments or supplements (if any);

b) The minutes and resolutions of the Annual General Meeting of Shareholders, along with any documents attached thereto, must be disclosed in accordance with the timeline prescribed in Point c, Clause 1, Article 9 of these Regulations.

Article 10. Extraordinary disclosure of information

1. A public company must make an extraordinary disclosure of information within 24 hours of the occurrence of any of the following events:

a) The company's account at a bank or foreign bank branch is frozen at the request of a competent authority, or when the payment service provider detects signs of fraud or legal violations related to the payment account; or the account resumes operation after being frozen in the cases specified in this point;

b) Upon receipt of a written notice from a competent state authority, or when the company issues a decision regarding: the suspension of part or all of its business operations; changes to the contents of its enterprise registration; the revocation of its Enterprise Registration Certificate; or the amendment, supplementation, suspension, or revocation of its License for Establishment and Operation or License for Operation;

c) Adoption of a resolution by the Extraordinary General Meeting of Shareholders. Disclosed documents include: the resolution of the General Meeting of Shareholders, the meeting minutes and documents attached thereto, and the resolution or vote-counting minutes (in the event of obtaining shareholders' opinions in writing). Where the General Meeting of Shareholders approves delisting, the Company must disclose information regarding the delisting, including the approval rate among shareholders other than major shareholders;

d) Decisions on the Company's share buyback or the sale of treasury shares; the date of exercising share purchase rights by holders of bonds with warrants or the date of converting convertible bonds into shares; decisions on offering securities overseas and decisions related to the offering or issuance of securities;

đ) Decisions on dividend rates, forms of dividend payment, and timing of dividend payment; decisions on stock splits or reverse stock splits;

e) Decisions regarding enterprise reorganization (division, spin-off, consolidation, merger, or conversion of enterprise type), dissolution, or bankruptcy; changes to the tax code, company name, or company seal; changes of location; establishment or closure of the headquarters, branches, factories, or representative offices; issuance, amendment, or supplementation of the Charter; and the Company's medium-term development strategy and plans, as well as annual business plans;



g) Decisions regarding changes to the accounting period or applicable accounting policies (except where the change in accounting policy is due to a change in legal regulations); notification of the audit firm engaged to audit the annual financial statements or a change of audit firm (after the contract has been signed); and the termination of a signed audit contract;

h) Decisions regarding capital contribution to establish a company or the acquisition of shares/capital to increase ownership in a company such that it becomes a subsidiary or an associate; the sale of shares/capital to reduce ownership in a subsidiary or an associate such that it ceases to be a subsidiary or an associate; or the dissolution of a subsidiary or an associate;

j) A resolution of the General Meeting of Shareholders or the Board of Directors approving a contract or transaction between the Company and an insider, a related person of an insider, or a related person of the public company;

k) Upon a change in the number of voting shares. The timing for information disclosure is determined as follows:

- In the event the company issues additional shares or converts bonds or preference shares into shares: from the time the company reports the issuance or conversion results to the State Securities Commission in accordance with the law on securities issuance;

- In the event the company repurchases its own shares or sells treasury shares: from the time the company reports the transaction results in accordance with the law on the repurchase of its own shares or the sale of treasury shares;

- In cases where a company repurchases shares from employees in accordance with its employee share issuance regulations or repurchases odd-lot shares at the request of shareholders; or where a securities company purchases its own shares to rectify trading errors or repurchases odd-lot shares, the company shall disclose information within the first 10 days of the month based on transactions completed and updated up to the date of disclosure;

l) The company changes, newly appoints, reappoints, or dismisses an insider; or receives a resignation letter from an insider (the company must clearly specify the effective date in accordance with the Law on Enterprises and the company's Charter). At the same time, the company shall submit to the State Securities Commission and the Stock Exchange the information disclosure regarding the new insider, using the form prescribed in Appendix III issued with this Circular;

m) Decisions to purchase or sell assets or to execute transactions valued at more than 15% of the company's total assets, based on the most recent audited annual financial statements or the most recent reviewed semi-annual financial statements. Where the public company is a parent company, the basis shall be the consolidated financial statements;

n) Upon receipt of a decision to initiate criminal proceedings against the company or an insider of the company; or a decision regarding the temporary detention of, or criminal prosecution against, an insider of the company;

o) Upon receipt of a legally effective court judgment or decision concerning the company's operations; or a decision imposing penalties for tax violations;

p) Upon receipt of a court notice regarding the acceptance of a petition to open bankruptcy proceedings for the enterprise;

q) When the company becomes aware of an event or information affecting the price of its own securities, it must confirm or clarify such event or information;

r) Upon the occurrence of other events significantly affecting the company's production, business operations, or governance;

s) Upon approval for listing or delisting on a foreign stock exchange.

2. When disclosing information as prescribed in Clause 1 of this Article, the company must clearly state the event that occurred, the cause, and remedial measures (if any).

3. Disclosure of information regarding an extraordinary General Meeting of Shareholders or the adoption of a Resolution of the General Meeting of Shareholders via a written ballot.

a) The disclosure of information regarding an extraordinary General Meeting of Shareholders shall be carried out in accordance with Clause 7, Article 8 of these Regulations;

b) In the case of obtaining the opinion of the General Meeting of Shareholders via a written ballot, at least 10 days prior to the deadline for returning the ballot, the Company must publish the information on its website and simultaneously send the ballot, the draft resolution of the General Meeting of Shareholders, and documents explaining the draft resolution to all shareholders.

4. Disclosure of information regarding the record date for the exercise of rights by existing shareholders

The Company shall disclose information regarding the expected record date for the exercise of rights by existing shareholders to attend the General Meeting of Shareholders at least 20 days prior to the expected record date.

5. Disclosure of information in other special cases

Following a change in the accounting period, the Company shall disclose financial statements for the period bridging the old and new financial years in accordance with regulations on enterprise accounting within 10 days of the date the auditing firm signs the audit report, but no later than 90 days from the commencement date of the new financial year.

Article 11. Disclosure of information upon request

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1. The company shall disclose information within 24 hours of receiving a request from the State Securities Commission or the Stock Exchange where the company's securities are listed or registered for trading, upon the occurrence of any of the following events:

- a) An event that seriously affects the legitimate interests of investors;
- b) Information regarding the company that significantly affects securities prices and requires confirmation.

2. The content of the information disclosed upon request must clearly state the event required to be disclosed by the State Securities Commission or the Stock Exchange; the cause and the company's assessment of the authenticity of the event; and remedial measures (if any).

Article 12. Disclosure of information regarding other activities of the Company

1. Disclosure of information regarding the offering, issuance, listing, and trading registration of securities, and reports on the use of proceeds.

When conducting private placements, public offerings, securities issuances, listings, or trading registrations, the Company shall fulfill its obligations to disclose information regarding these activities and report on the use of proceeds in accordance with the law on the offering, issuance, listing, and trading registration of securities.

2. Disclosure of information regarding the repurchase of its own shares and the sale of treasury shares.

a) In the event that the Company repurchases its own shares or sells treasury shares, it must disclose information in accordance with the law governing the repurchase of its own shares and the sale of treasury shares.

b) In the event that the Company repurchases its own shares, if the total value of assets recorded in the accounting books decreases by more than 10% following full payment for the repurchased shares, the Company must notify all creditors and disclose the information within 15 days from the date of completing the payment obligation for the share repurchase.

Chapter III

DISCLOSURE OF INFORMATION BY INVESTORS SUBJECT TO INFORMATION DISCLOSURE REQUIREMENTS

Article 13. Disclosure of information regarding share ownership by major shareholders

1. Organizations, individuals, and groups of related persons that own 5% or more of the Company's voting shares, or that cease to be major shareholders, must disclose information and report share transactions to the Company, the State Securities Commission, and the Stock Exchange within 05 working days from the date of becoming or ceasing to be a major shareholder.

2. Major shareholders and groups of related persons holding 5% or more of the Company's outstanding voting shares must disclose information and report to the State Securities Commission, the Stock Exchange, and the Company within 05 working days from the date of the change, whenever their share ownership ratio increases or decreases across 1% thresholds (including cases of gifting or receiving gifts, inheritance, transfer or receipt of transfer of rights to purchase newly issued shares, etc.);

3. The time of becoming a major shareholder or ceasing to be one, or the time of a change in share ownership ratio across the 1% thresholds specified in Clauses 1 and 2 of this Article, shall be calculated from the date of completion of the securities transaction as prescribed in Clause 9, Article 2 of these Regulations.

4. The provisions of Clauses 1 and 2 of this Article shall not apply to changes in the holding ratio of outstanding voting shares resulting from the Company's trading of treasury shares or issuance of additional shares;

5. The company shall disclose information on its website within 03 working days of receiving a report regarding changes in the share or fund certificate ownership ratio of the persons specified in this Article.

Article 14. Disclosure of information by insiders and persons related to insiders.

1. Company insiders (hereinafter collectively referred to as "insiders") and their related persons (hereinafter collectively referred to as "related persons") must disclose information and submit reports both prior to and following the execution of transactions to the State Securities Commission, the Stock Exchange (in the case of listed shares, shares registered for trading, or listed public fund certificates), and the company itself, whenever the expected daily transaction value is VND 50 million or more, or the expected monthly transaction value is VND 200 million or more. These values are calculated based on par value (for shares, convertible bonds, and fund certificates), the most recent issuance price (for covered warrants), or the transfer value (for rights to purchase shares, convertible bonds, or fund certificates). This requirement applies even to transfers executed outside the Stock Exchange's trading system (such as gifting, receiving gifts, inheritance, the transfer or receipt of securities, and other instances), as detailed below:

a) At least 03 working days prior to the intended transaction date, insiders and related persons must disclose information regarding the intended transaction using the form prescribed in Appendix XIII or Appendix XIV to Circular 96/2020/TT-BTC;

b) The transaction execution period shall not exceed 30 days from the date of registration. Insiders and related persons must adhere to the timing, volume, and value disclosed by the Stock Exchange and may only execute the initial transaction on the trading day immediately following the date of information disclosure by the Stock Exchange;

c) In the event of purchasing transactions during share or fund certificate issuances or public tender offers, the subjects required to disclose information under this Article are exempt from the obligations specified in Point b of this

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Clause and shall instead comply with legal regulations governing offering, issuance, and public tender offer activities;

d) Insiders and related persons shall not simultaneously register for or execute transactions to buy and sell shares, stock purchase rights, convertible bonds, convertible bond purchase rights, fund certificates, fund certificate purchase rights, or covered warrants within the same registration or transaction period; they may only register for or execute a subsequent transaction after reporting the completion of the previous transaction; except where a fund management company or a branch of a foreign fund management company in Vietnam acting as a related person of an insider registers for or executes transactions to buy and sell securities for ETFs or for investments under the mandate of entrusting clients, provided that it ensures no single entrusting client simultaneously registers for or executes buy and sell transactions within the same registration period;

đ) Within 05 working days from the date of transaction completion (in cases where the transaction concludes before the registered deadline) or the end of the expected transaction period, insiders and related persons must disclose information regarding the transaction results and simultaneously explain the reasons for any failure to execute the transaction or failure to complete the registered volume (if applicable), using the form prescribed in Appendix XV or Appendix XVI to Circular 96/2020/TT-BTC;

e) Insiders and related persons who are subject to the reporting and information disclosure requirements under this Clause and also subject to the reporting and information disclosure requirements under Article 12 of these Regulations are only required to fulfill the information disclosure obligations applicable to insiders and related persons.

2. If an insider or an affiliated person is not subject to the reporting and information disclosure requirements under Clause 1 of this Article but is subject to the reporting and information disclosure requirements under Article 12 of these Regulations, they must fulfill the reporting and information disclosure obligations prescribed in Article 12 of these Regulations.

3. The regulations on information disclosure obligations in Points a, b, and d, Clause 1 of this Article do not apply to cases where a securities company performs a forced sale of shares belonging to a client who is an insider of that company.

4. In cases where, after registering a transaction, the registrant ceases to be an insider of a public company, a public securities investment company, or a public fund or ceases to be an affiliated person of such entities—the registrant must still comply with the reporting and information disclosure requirements prescribed in Clause 1 of this Article.

5. Where a parent company, a political organization, a socio-political organization (such as a trade union or youth union), or an individual holding a managerial position as defined in the company's Charter engages in securities transactions involving the company, they must fulfill the information disclosure obligations applicable to insiders and related persons.

6. Within 03 working days of receiving reports regarding securities transactions by insiders and related persons as prescribed in this Article, the Company must disclose such information on its website.

Article 15. Disclosure of information regarding public tender offers

The organization or individual making a public tender offer and the target company must disclose information in accordance with the Law on Securities and guiding documents.

Chapter IV

ORGANIZATION OF IMPLEMENTATION AND EFFECTIVENESS

Article 16. Responsibilities of the person authorized to disclose information

1. The person responsible for information disclosure is accountable for fulfilling the Company's information disclosure obligations to the State Securities Commission (SSC), the Stock Exchange, investors, and other relevant parties in accordance with the law and the Company's Charter.

2. The authorized person for information disclosure serves as the point of contact for gathering information and executing the Company's information disclosure obligations as stipulated in these Regulations.

3. Functions and duties of the authorized person for information disclosure:

- Act with honesty, responsibility, and prudence, and possess an understanding of the Company's operations;
- Publicly provide a business telephone number to facilitate easy contact by shareholders;
- Devote sufficient time to performing their duties, particularly regarding communicating with shareholders, recording shareholder feedback, and periodically publishing responses to shareholder inquiries and corporate governance matters as prescribed;
- Review the content of documents and periodic reports prior to disclosure; ensure the completeness and timeliness of such documents and reports;
- Be responsible for fulfilling the Company's information disclosure obligations to the State Securities Commission, the Stock Exchange, investors, and other relevant parties in accordance with the law and the Company's Charter.

Ensure that the information to be disclosed is submitted to or posted on the information disclosure channels as prescribed by this Regulation.

- The person authorized to disclose information must oversee the disclosure process and report the implementation results to the Board of Directors.

4. Adjustments to information disclosure

In the event that, following the disclosure of information, the Company receives feedback regarding the accuracy and completeness of the disclosed information, the authorized person is responsible for verifying the information and making any necessary additions or amendments within 48 hours of receiving such feedback. Supplementary disclosures or corrections must be made in accordance with regulations.



Article 17. Responsibilities and relationships among departments regarding the provision of information to the authorized information disclosure officer.

1. Within the scope of their functions, the authorized information disclosure officer shall periodically urge functional departments to provide information in accordance with this Regulation.

Heads of functional departments and the Secretary to the Board of Directors shall be responsible for the accuracy and timeliness of information provided to the authorized information disclosure officer.

Regarding extraordinary information or information required to be disclosed pursuant to Articles 9 and 10 of this Regulation, the heads of the functional departments (where the information originates) are responsible for proactively providing such information to the authorized information disclosure officer within 12 hours of the occurrence of the event.

2. The authorized information disclosure officer shall consolidate the information, verify it, and assign tasks related to information disclosure in accordance with regulations.

Article 18. Implementation and handling of violations

1. The Company shall publish the Information Disclosure Regulation on its website and submit it to the Stock Exchange prior to implementation;

2. The Information Disclosure Regulation shall be disseminated to all departments, divisions, affiliated units, and employees of the Company;

3. Departments, divisions, affiliated units, and employees of the Company who violate the provisions of this Regulation or legal regulations thereby causing damage to the Company in connection with the implementation or management of information disclosure activities shall be subject to disciplinary action, administrative penalties, or legal liability, depending on the nature and severity of the violation; if damage is caused, compensation must be made in accordance with the law.

4. In the event of changes in the law resulting in provisions of this Regulation conflicting with or no longer being consistent with new legal regulations, the new legal regulations shall apply.

Article 19. Effectiveness

This Information Disclosure Regulation takes effect date August .14...,2026 and is issued together with Decision No.46./QĐ- HDQT dated August...14..., 2026.

ON BEHALF OF THE BOARD OF DIRECTORS
CHAIRMAN

