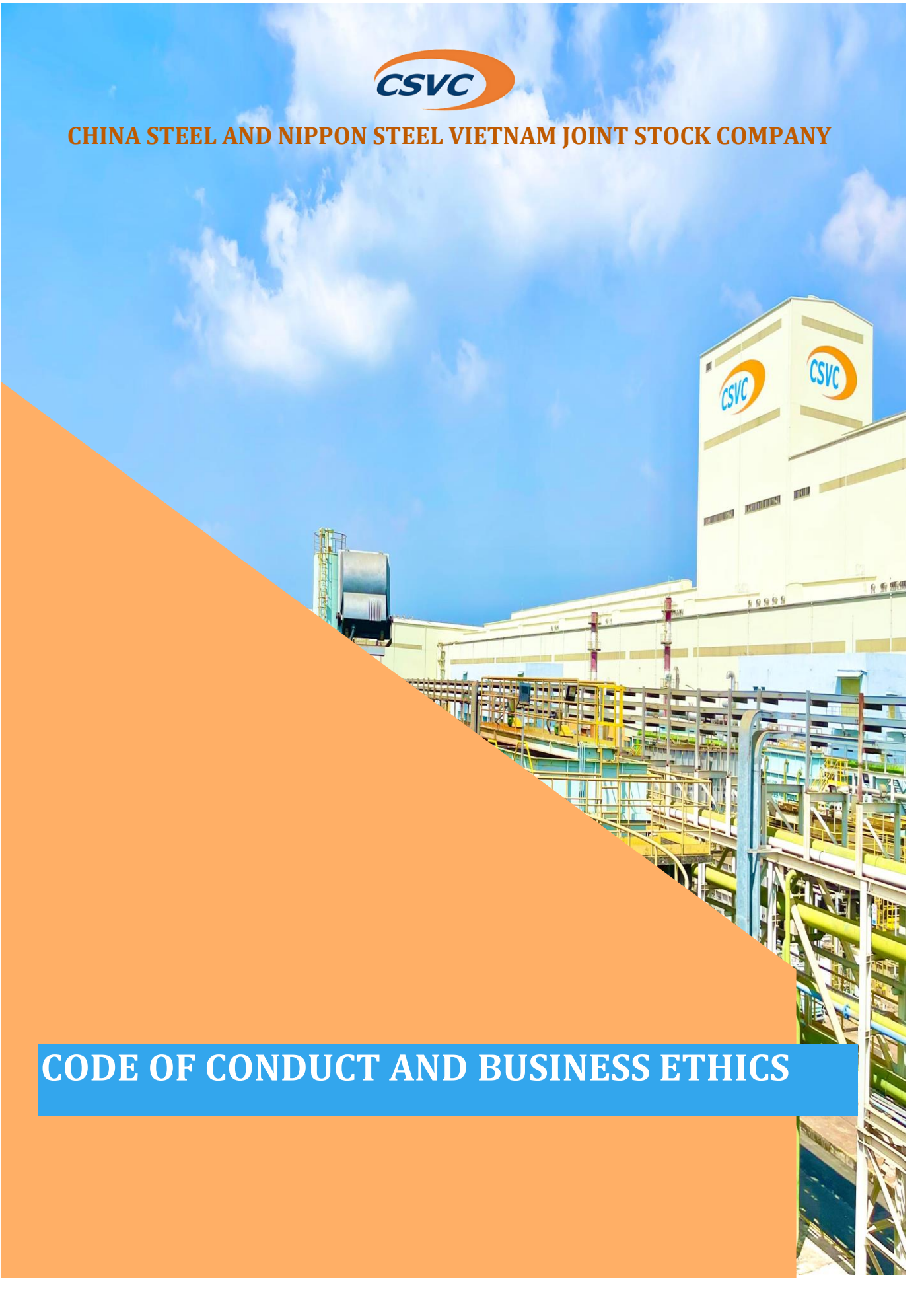




CHINA STEEL AND NIPPON STEEL VIETNAM JOINT STOCK COMPANY

The background of the cover is a photograph of a large industrial facility, likely a steel mill, under a bright blue sky with scattered white clouds. The facility includes a tall, light-colored building with the CSVC logo on its upper section, and a complex network of yellow and blue pipes and structural steel in the foreground. A large orange diagonal shape cuts across the lower-left portion of the image.

CODE OF CONDUCT AND BUSINESS ETHICS

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MESSAGE FROM THE TOP MANAGERS

China Steel and Nippon Steel JSC (“CSVC”) always takes pride in being one of the current most innovative and modern steel sheet manufacturing factories not only in Vietnam but also in Southeast Asia. The position of CSVC in both the domestic and foreign markets has been continuously consolidated.

With the slogan "***Our Quality, Your Better Life***", CSVC consistently prioritizes quality, this is a great goal and a guideline in all CSVC activities, which is demonstrated by the trust of customers, partners, and stakeholders for CSVC in the long-term cooperation journey.



To achieve this objective, CSVC has oriented and built our corporate culture based on 05 core values since the first days of establishment and throughout the development line.

1. **Teamwork:** Be respectful of cultural differences and consistently perform assigned tasks with enthusiasm and dedication.
2. **Enterprise:** Integrity management to meet customer needs and a brand trusted by society.
3. **Innovation:** Rapid innovation of customized products and breakthrough thinking to embrace reforms.
4. **Down-to-earth:** Be brave to take responsibility be pragmatic in the face of internal and external changes and be responsible to the end.
5. **Integrity:** abide by the values of honesty and courage to adhere to the belief as the highest standard.

These values are considered the foundation for building and developing the Company's Code of Conduct and Business Ethics with ethical standards in all actions and daily work of CSVC.

For the above reasons, company leadership encourages each CSVC employee always to uphold the spirit of self-discipline ethical practice, and behavior in accordance with both the Company's Code of Ethics and legal regulations. Let's determine to build and develop a positive workplace, a great culture with civilized behavior. And, no matter what your position, we hope all CSVC members will show bravery, integrity, and fairness in every word, gesture, and action to contribute to demonstrating CSVC's prestige and reputation in the market.



SUSTAINABLE DEVELOPMENT (ESG report)

Along with the goal of business development and improving product quality, CSVN always values matters of climate change, gender equality, social welfare, and a variety of other environmental and community concerns.

Sustainable business development with the criteria of E - Environment, S - Society, and G - Governance has become our strategic goal.

The spirit of respecting and protecting the environment, contributing to community development, doing volunteer activities, and corporating governance by empowering has been comprehended and positively implemented by each CSVN employee.

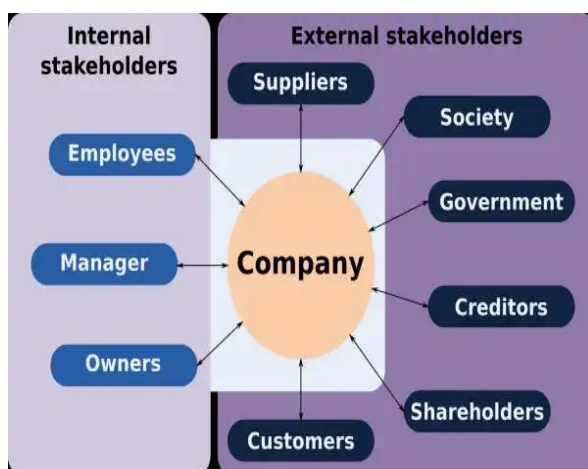
INTRODUCTION



The Code of conduct and Business ethics are built based on the results from the company's development process, to help us always have the appropriate behavior to handle all situations, circumstances and in accordance with CSVCS's culture in particular and social ethical standards in general.

All the principles set up in this Code will guide the decision-making process for all issues related to the business operation, to see if those decisions are suitable with regulations and rules of the Company or not? Or are they in compliance with principles of this Code of Conduct or not? However, no Code of Conduct can address all situations we may face. Therefore, we believe that each member of CSVCS will base on **integrity, honesty** to make the right decisions to protect the **reputation** and **prestige** of the Company.

In this Code, the nouns "Company", "We" are understood to refer to the entire China Steel & Nippon Steel Vietnam Joint Stock Company including all staffs of the company.



The content of the Code will aim at the spirit of respect, integrity, and fairness in CSVCS's behavior towards all business relationships. It also demonstrates our deep concern for the community, the environment and social responsibility throughout the formation and development of CSVCS. That is to guide sustainable and superior development in the future.

MANPOWER – GREAT RESOURCES



Human resources are always considered an important and valuable resource of the Company. Each employee is the brick that builds the solid development of CSVC today.

As a member of CSVC, each employee will be a representative of the prestige, reputation, images, interests, and core values of CSVC. Therefore, we are constantly training ourselves and improving our responsibility to comply with the Code of Ethics as well as other internal regulations. This is the guideline for each individual to protect and develop themselves and contribute to the development of the Company.

The spirit of respecting for the law

In addition to adhering to the internal regulations of CSVC, each CSVC employee must always comply with the law. CSVC employees should be aware that violations of the law will not only cause serious consequences for the individuals concerned but also seriously affect the image, prestige, and reputation of CSVC.



Integrity in all actions

Integrity is one of the typical values that create CSVC culture. Each CSVC employee always upholds integrity and honesty in each internal and external activity.

Therefore, we commit not to work with behavior of harassing, demanding, or suggesting receiving, giving gifts, bribing, or offering privileges, incentives to customers, partners, suppliers, or related parties in exchange for any benefits that are illegal, unfair, or lacking in transparency.



HEALTHY WORK ENVIRONMENT



CSVC always aims for a healthy and friendly working environment. Colleague relationships are built on respecting, trust, teamwork, sharing experiences and constantly learning to improve work efficiency, and ready to receive feedback from colleagues.

Respecting and complying with superiors' work assignments is always highly appreciated. And to achieve good work results, managers always be an example of attitude and behavior at the workplace, lifestyle, comply with labor discipline, internal regulations, and Vietnamese laws, and also be a guide for department to successfully complete assigned responsibilities.

CSVC expects and trusts its employees to complete tasks and make decisions when mentally alert and not under the influence of beer, alcohol, drugs, or any other stimulants.

The company always creates conditions and organizes training programs so that each employee has a learning environment and improves their personal capacity throughout their working process at CSVC.

At CSVC, we are **determined not to discriminate** based on personal characteristics such as racism, religion, ethnic origin, gender, social status, marital status, illness, or similar at work.

We **do not allow the use of labor under 18 years of age**, forced labor, discrimination, harassment, abuse, bullying, isolation, or disparaging of appearance through words, gestures, or actions.

The safety, equality, mental and physical health of each employee are always cared for and protected in the most comprehensive way by the Company.



ASSETS PROTECTION

CSVC's assets include all tangible and intangible assets created from investment, construction, and development activities throughout the Company's business process, in which CSVC has the right to own, manage, use and dispose. CSVC assets include unlimitedly cash, facility, working tools, means of transportation, email system, intranet, information of employees, customers, suppliers, etc.

This asset is used for the main purpose of serving the Company's business. We commit to preserve and protect CSVC's assets carefully and economically. And we also always promptly repay them to the Company immediately after finishing the work.

CSVC strictly prohibits the appropriation of the Company's assets in any forms; All action of property appropriation will be strictly handled according to the Company's internal regulations as well as relevant laws.

INFORMATION SECURITY

The source of information that CSVC assesses is as confidential as related information and documents related to: selling strategies, business plan, production plan, financial data, technical information of products, changes to senior positions, trade secret, current or future products and services, research and development, inventions, potential contracts, market research or any information which has not been issued, financial statement, organizational structure of CSVC (not belong to the scope of disclosure as regulated).



Regardless of the form it exists in, CSVC requires its employees as well as related parties to strictly and thoroughly implement the security policy.

BEHAVIOR IN BUSINESS



With the spirit of respect, cooperation, and sustainable development in the relationship with:

- **Customers,**
- **Partners,**
- **State agencies,**
- **Shareholders,**
- **And other relevant parties.**

CSVN has clearly shown this with the slogan ***“Our quality, your better life”***. CSVN understands that nurturing, maintaining relationships through efforts in business activities, integrity in all actions will build a solid foundation for long-term companionship and development.

Gifts or business hospitality express goodwill, cooperation and have absolutely unmeaning of gratitude or a way of asking, demanding to receive economic benefits or benefits of any individual. Therefore, any gifts or hospitality have normal value, are within the limit and are absolutely not a factor affecting the decision-making of CSVN or the party receiving the gift or hospitality.

Be customer-focused



With slogan

“OUR QUALITY, YOUR BETTER LIFE”,

customer satisfaction and trust are CSVN's top priority.

Each CSVN employee must be honest, take good care of each customer and make every effort to provide customers with high-quality products of competitive price. Always consider customer success as CSVN's own success.

Besides, commission offer or discount for customers must be following current Vietnam laws together with documents to prove the offer. Trade preferences for customers must be appropriate to the market status and be approved and registered in accordance with regulations of the Company.

Suppliers

As a business operating based on reputation and quality, CSVC always respects and maintains honesty towards its suppliers through CSVC is committed to complying with the laws and regulations related to transactions with suppliers.

These transactions are based on the principle of fairness, honesty, objectivity, and harmony of interests. CSVC's supplier selection is always based on defined criteria such as price competitiveness, quality and other appropriate conditions and standards.



We will not accept any behavior related to receiving commissions or similar amounts to change the supplier selection process for each specific bidding package at CSVC.

State agencies

By respecting the laws of the host country, CSVC always operates and develops based on closely following the guidance and supporting of government agencies.

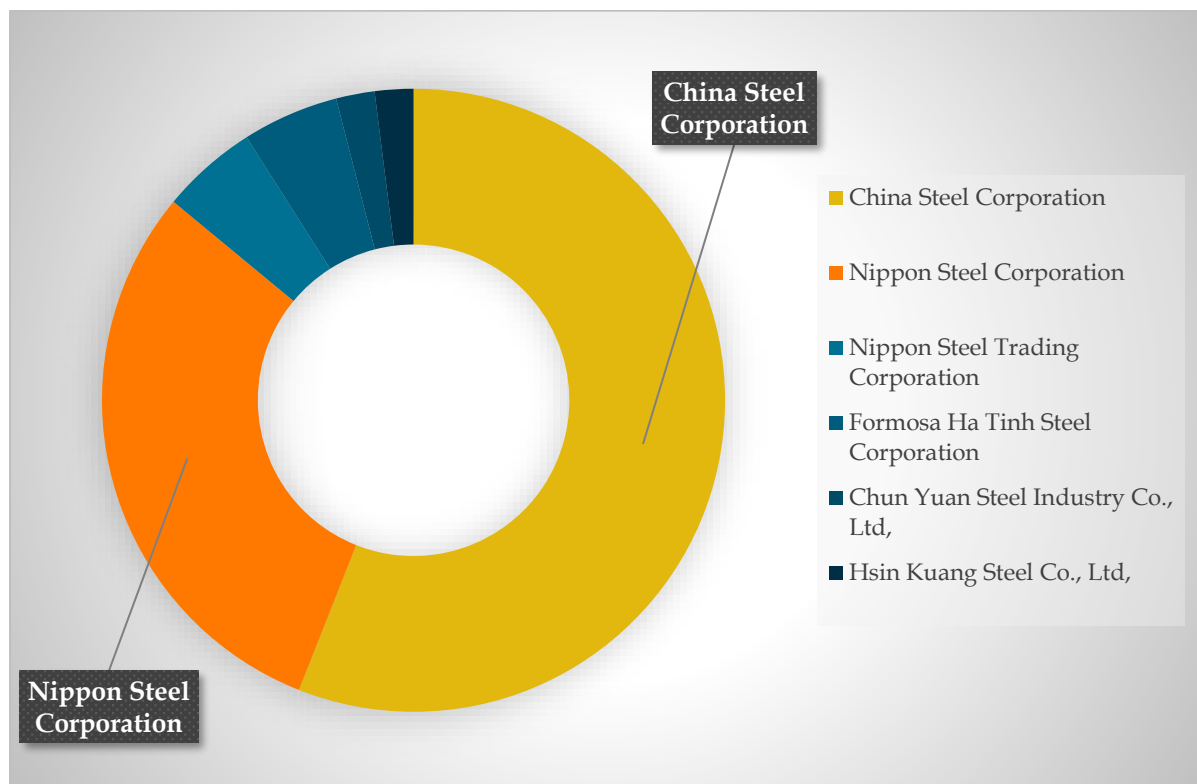
There will not be any acts of bribery to gain special benefits in carrying out legal procedures at government agencies.



CSVC absolutely does not carry out acts of concealing law violators in any forms

All CSVC's employees while performing their work, are absolutely not allowed to perform any action on behalf of the Company such as giving gifts or other similar forms of significant value State agency civil servants in order to achieve goals.

Shareholders



Not only being honest, fair in cooperative relationships with customers, suppliers, government agencies and other relevant third parties, CSVC always believes that policies and strategies which are approved and thoroughly implemented by shareholders.

This is clearly shown through the process of formation and development, CSVC has achieved great values, is becoming one of the leading steel enterprises in the domestic market and constantly expanding internationally.

For that reason, respecting and treating all shareholders fairly and considering the interests of shareholders as the interests of the Company as well as of each employee. That is CSVC's principles.

NOTICE AND HANDLING

CSVC does not accept any fraudulent, unjust, non-compliance with the law or other wrongful acts of employees within the Company as well as organizations and individuals work outside the Company during their work.

The Company encourages employees, external organizations and individuals to provide their names when making allegations. Any anonymous charges will not be accepted. All allegations will be reviewed for truthfulness, accuracy, the ability to confirm the sources of information provided, and confidentiality will be guaranteed throughout the processing process.

Each CSVC employee is a supervisor for themselves and their colleagues in detecting and reporting violations.

The accuser can make a report at the Reporting illegal acts section on the CSVC's website www.csvc.com.vn and must be very specific and detailed, clearly stating the parties involved, the time of the incident, the classification of the incident, the evidence to support the allegations, and if possible provide detailed information contact so the Company can call in case additional information is needed.



In addition, when it is noticed that there are behaviors that may lead to a violation of this Code of Conduct and Business Ethics or any internal regulations, standards or be considered a violation of the law, immediately or within the shortest time, sharing and transferring that information to the appropriate Manager or Department/Section as guided in the internal standards. This action is always highly appreciated and is guaranteed to keep the provider's information and personal data confidential.

SOLIDARITY AND SUSTAINABLE DEVELOPMENT

The Code of Conduct and Business Ethics is applied within the Company, representative offices, and affiliated units.

All employees are responsible for complying with this Code. And each member of CSVN communicates the content of the Code to Customers, Partners, etc. with the expectation that they will respect the Code when participating in cooperation with the Company.

We will always acknowledge comments to supplement and update this Code according to each period.

With efforts and commitment, let's build CSVN into a united and sustainable group with pride and dignity./.