

The Whistleblowing Policy and Procedure of China Steel Sumikin Vietnam Joint Stock Company

1. Purpose and Scope

China Steel Sumikin Vietnam Joint Stock Company (“the Company” or “CSVN”) does not tolerate any malpractice, impropriety, statutory non-compliance or wrongdoing by employees and outside parties during their work. This Whistleblowing Policy (“the Policy”) is intended to provide a framework to promote responsible and secure whistleblowing without fear of adverse consequences.

Employees and outside parties, such as suppliers, customers, contractors and other stakeholders, may use the procedures set out in the Policy to report any concern or complaint regarding questionable accounting or auditing matters, internal controls, disclosure matters, conflict of interest, insider trading, collusion with competitors, or any other matters involving fraud, corruption and employee misconduct.

The Policy allows for reporting by employees or outside parties of such matters to the Independent Designated Officers, without fear of reprisal, discrimination or adverse consequences, and also permits the Company to address such reports by taking appropriate action, including, but not limited to, disciplining or terminating the employment and/or services of those responsible.

The Policy is meant to protect genuine whistleblowers from any unfair treatment because of their report. Frivolous and bogus complaints will be disregarded. The Policy is also not a route for taking up personal grievances. These should continue to be taken up directly with Division or Department heads.

2. Definition

Whistleblowing is the disclosure of information which relates to suspected wrongdoing. This may include but not limited to:

- (1) Forgery;
- (2) Misappropriation of funds;
- (3) Leaks of classified document for person gain;
- (4) Abuse and misrepresentation of power and authority;

- (5) Failure to comply with laws and regulations;
- (6) Harassment;
- (7) Corruption and bribery;
- (8) Theft.

3. Reporting Mechanisms

The Company encourages employees and outside parties to put their names to their allegations. Any concerns or irregularities expressed anonymously will not be considered. All the allegations will be taken into account the seriousness and credibility of the issues raised, and the likelihood of confirming from attributable sources and information provided. All concerns or irregularities raised will be treated with confidence and every effort will be made to ensure that confidentiality is maintained throughout the process.

Concerns would be raised through the CSVC Irregular Business Conduct Reporting website by whistleblowers. As it is essential for the Company to have all critical information in order to be able to effectively evaluate and investigate a complaint, the report made should provide as much detail and be as specific as possible. The complaint should include details of the parties involved, dates or period of time, the type of concern, evidence substantiating the complaint, where possible, and contact details, in case further information is required.

Irregular Business Conducts reporting would be made at CSVC's website as follows:

CSVC Irregular Business Conduct Reporting website: www.csvc.com.vn

The Independent Designated Officers, who will be responsible for the all whistle-blowing matter of the Company, would be recommended by the General Director of the Company. Complaints raised to other parties within the Company will be directed to the Independent Designated Officers, who are responsible for maintaining a centralized repository of all reported cases and ensuring that issues raised are properly resolved.

4. Confidentiality

The Company does not encourage employees or outside parties to raise concerns anonymously. Proper investigation may be more difficult or impossible if the Company can not obtain further information. It is also more difficult to establish whether any allegations are credible. However, unless otherwise provided by laws, the Company will maintain the confidentiality of the whistleblower's personal information and protect the identity to the fullest extent permitted by law.

5. Handling of complaints

- (1) Upon the receipt of a complaint, the Independent Designated Officers should review and make a record of receipt of the complaint and mark the data as secured information to ensure its confidentiality.
- (2) Immediately upon receipt, the Independent Designated Officers should notify the General Director, and lead the relevant division/department to conduct an initial preliminary investigation to ensure prompt and appropriate action taken well.
- (3) After the investigation within the relevant division/department, all matters reported in writing will be reviewed within a reasonable timeframe by the Independent Designated Officers, and after due consideration and inquiry, a decision will be taken on whether to proceed with a detailed investigation. If not, the Independent Designated Officers would issue the investigation report for the complaint.
- (4) The investigation report of the complaint issued by the Independent Designated Officers will be notified to the General Director of the Company. In addition, where the complaints relate to a senior executive and/or the manager level above, the matter and report would be notified in the Board of Meeting of CSVC.
- (5) Upon receipt of the initial investigation report by the Independent Designated Officers, the General Director of Company should organize the CSVC Ethics Review Committee to evaluate the complaint. The CSVC Ethics Review Committee would consist of the General Director and other members decided by the General Director of the Company.
- (6) The CSVC Ethics Review Committee would hold a meeting to review the report and determine if there would be any further investigation procedure for the complaint. However, it should be maintained the confidentiality of the

whistleblower's personal information during the reviewing by the members of the CSVC Ethics Review Committee,

- (7) If the CSVC Ethics Review Committee determines that no further investigation procedure is required and a violation has occurred, CSVC Ethics Review committee should make the recommendation of the effective remedial and disciplinary action plan with severity of the offence at the conclusion of the meeting.
- (8) The disciplinary action may include but not limited to :
 - A. Disciplinary action;
 - B. Dismissal;
 - C. Recovery of assets;
 - D. Filing an insurance claim;
 - E. Initiation of legal proceedings.
- (9) After the end of the CSVC Ethics Review Committee meeting, the minutes of the meeting recorded in writing should be filed and stored confidentially, and the management of the Company should implement the remedial and disciplinary action recommended by the CSVC Ethics Review Committee.
- (10) As appropriate to the circumstance, the Independent Designated Officers should contact the whistleblower who reports the concern for the feedback if possible.
- (11) During the investigation period, the Company would reserve the right to refer any concerns or complaints to appropriate external regulatory authorities. Depending on the nature of the complaint, the subject of the complaint may be informed of the allegations against him or her and be provided with an opportunity to reply to such allegations. Employees who fail to cooperate in an investigation, or deliberately provide false information during an investigation, shall be subject to strict disciplinary action up to.
- (12) All written records regarding each complaint should be kept in a secured complaint investigation file. The completed investigation file should be stored confidentially in secured files and maintained by the Independent Designated Officers.

6. Protection and support for whistleblowers.

The Company prohibits discrimination, retaliation or harassment of any kind against a whistleblower who submits a complaint or report in good faith. If a whistleblower believes that he or she is being subjected to discrimination,

retaliation or harassment for having made a report under this Policy, he or she should immediately report those facts to the Independent Designated Officer. Reporting should be done promptly to facilitate investigation and ask the General Director of the Company to take the appropriate action.

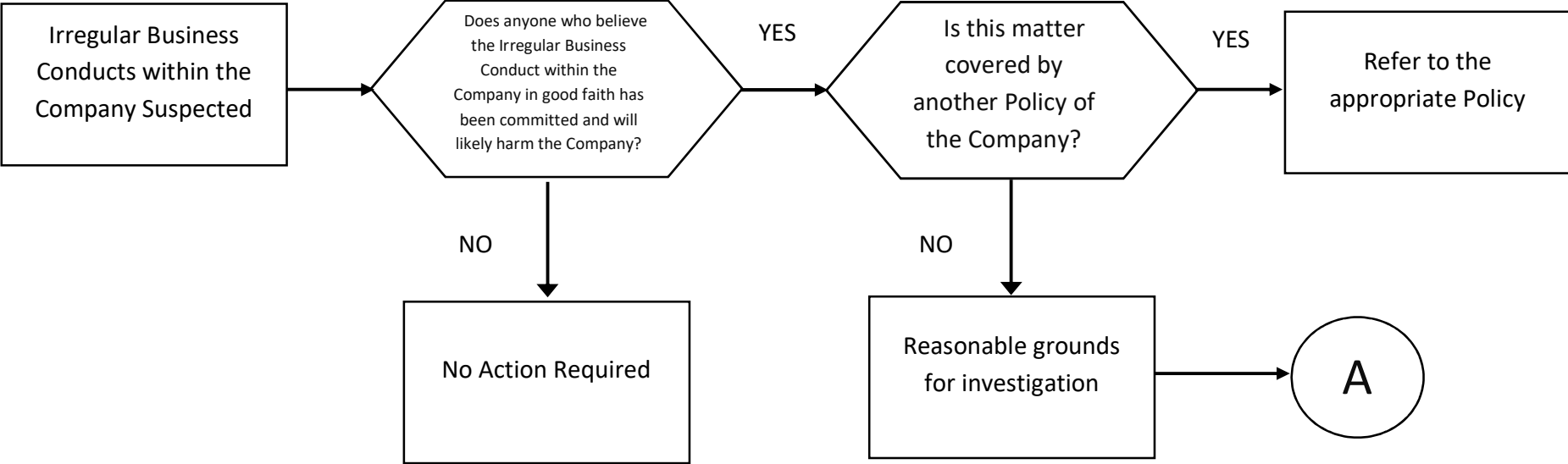
At the appropriate time, the party making the report/complaint may need to come forward as a witness. If an employee or outside party makes an allegation in good faith but it is not confirmed by the investigation, no action will be taken against him or her. If, however, an employee has made an allegation frivolously, maliciously or for personal gain, disciplinary action may be taken against him or her. Likewise, if investigations reveal that the outside party making the complaint had done so maliciously or for personal gain, appropriate action, including reporting the matter to the police, may be taken.

7. Modification

The Company may modify this Policy to maintain compliance with applicable laws and regulations or accommodate organizational changes within the Company. The Policy and any amendments would take effect after the date of the approval by the General Director of the Company.

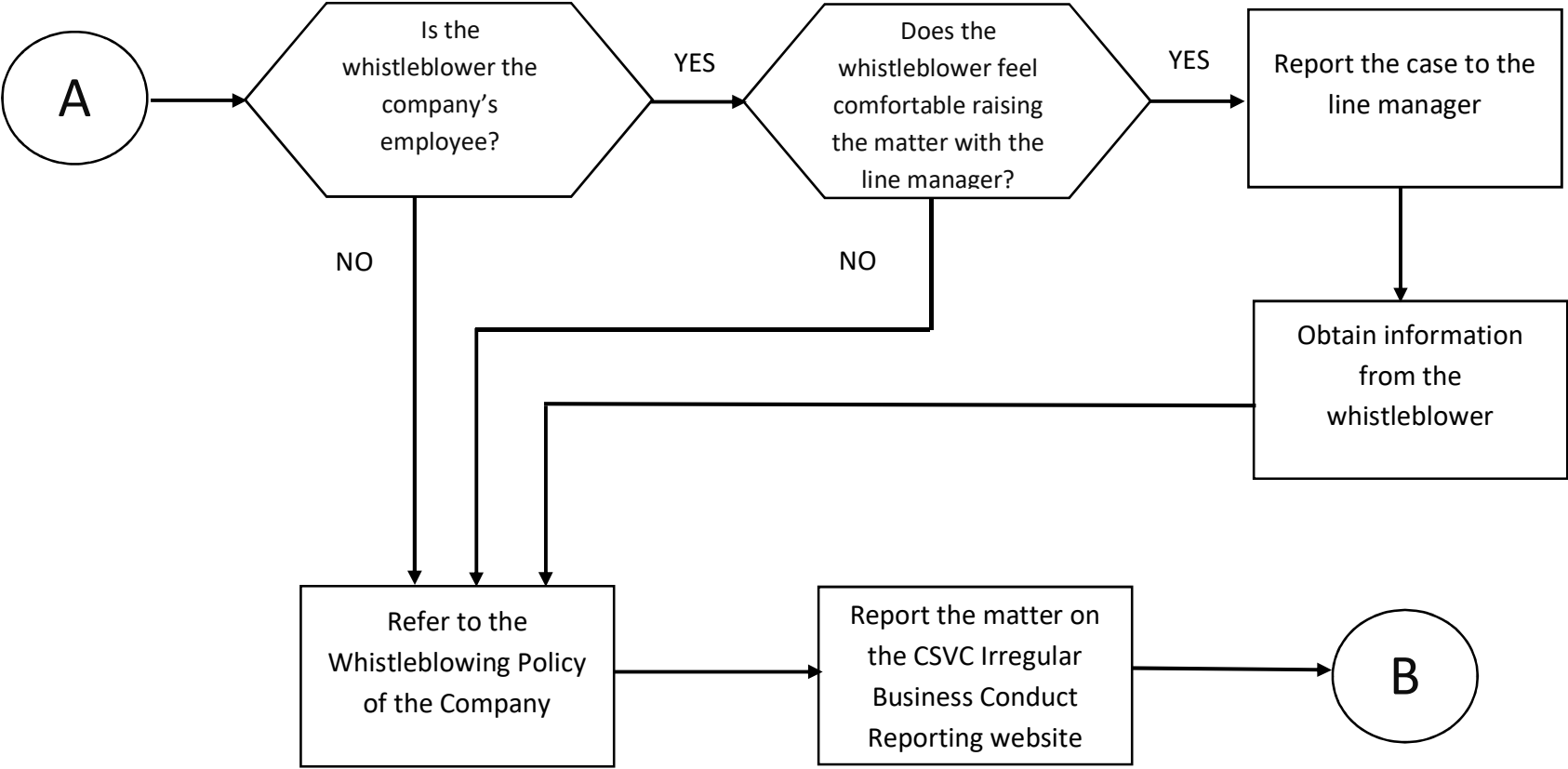
Annexure : The Whistleblowing Process Flowchart of China Steel Sumikin Vietnam Joint Stock Company

1. Whistleblowing Process



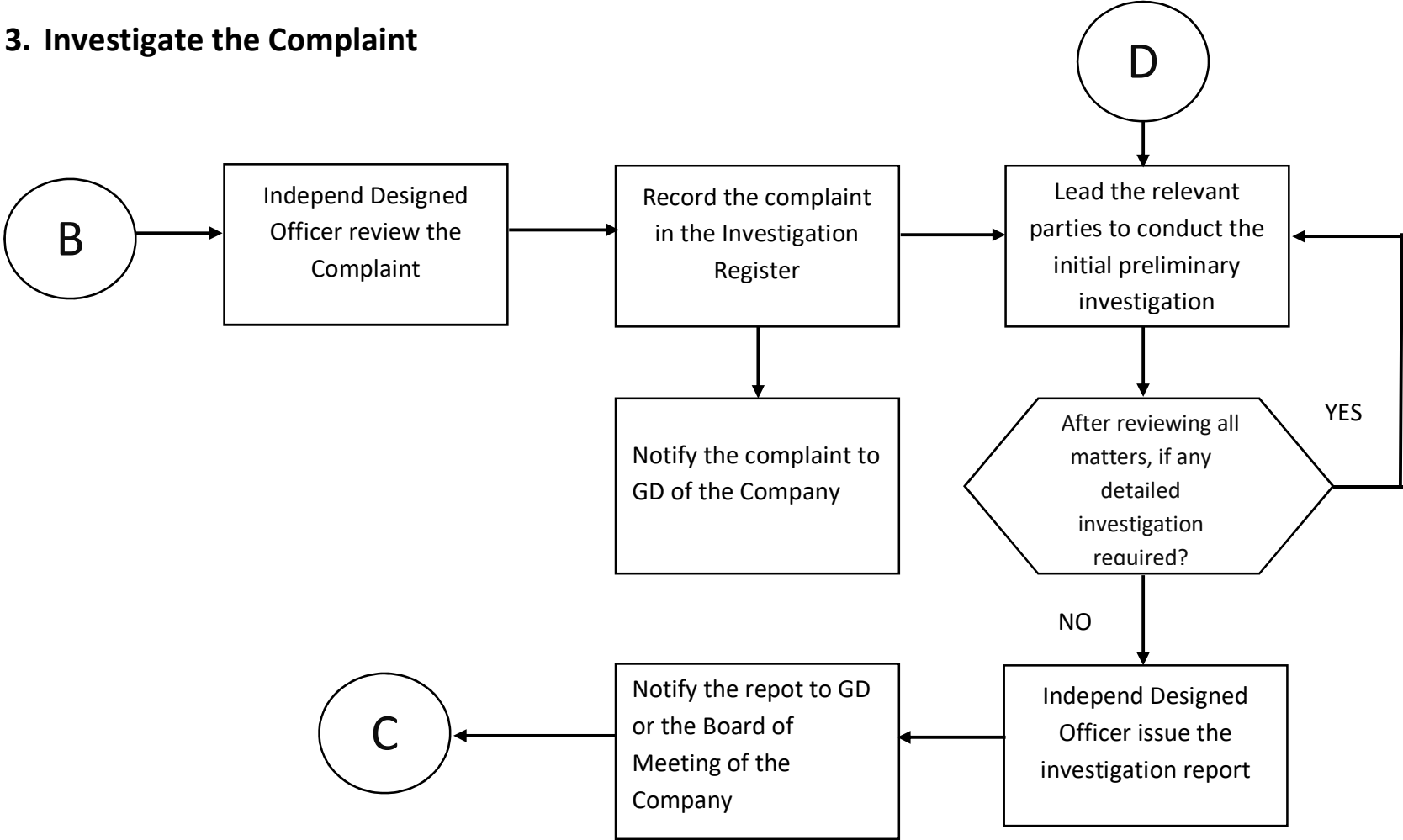
Annexure : The Whistleblowing Process Flowchart of China Steel Sumikin Vietnam Joint Stock Company

2. Identify Appropriate Reporting Mechanisms



Annexure : The Whistleblowing Process Flowchart of China Steel Sumikin Vietnam Joint Stock Company

3. Investigate the Complaint



Annexure : The Whistleblowing Process Flowchart of China Steel Sumikin Vietnam Joint Stock Company

4. Course of Action and Feedback of Investigation

