

# CODE OF CONDUCT

*(Issued together with Decision No. 26022026/QĐ-RKS dated 26/02/2026)*

## MESSAGE FROM MANAGEMENT

Established in 2012 as a startup, Rikkeisoft has grown into a strong and prosperous company, proudly standing as a leader in information technology services and software development. To achieve today's success, every Rikkeisoft member has continuously strived and persevered through numerous difficulties and challenges. All these efforts have forged and accumulated unique qualities and values, creating a Rikkeisoft corporate culture that is youthful yet full of energy and vitality.

### \* Rikkeisoft's 05 Core Values:

#### **AMBITION – PROGRESS – CREATIVITY – DEDICATION – SHARING.**

- **Ambition:** Always set challenging goals and be determined to achieve them.
- **Progress:** Continuously seek knowledge and exceed limitations. Utilize the organizational learning spirit as a driving force for development.
- **Creativity:** Always ready to innovate, explore new methods to achieve better results.
- **Dedication:** Always exert maximum effort for clients and take responsibility for every task.
- **Sharing:** Willing to impart value to colleagues and the community.

### \* Implementing Vision – Mission:

With the mission to elevate Vietnamese values, Rikkeisoft is determined to mark its position on the world technology map: Delivering high-quality products and services to clients; Maintaining an ambitious spirit, being a place that fosters dreams and brings happy, prosperous lives to every Rikkeisoft member, while contributing to the nation's prosperity.

- **Mission:** ELEVATE VIETNAMESE VALUES
- **Vision:** BECOME VIETNAM'S NUMBER 1 DIGITAL TECHNOLOGY GROUP

### \* Code of Conduct System:

To achieve rapid development in the future, Rikkeisoft must maintain and enhance its reputation based on respect for Ethical Values. Therefore, the Code of Conduct is established to provide a foundation for everyone within the Company, whether employees, managers, or executives, to adhere to.

This Code of Conduct aims to guide the ethical standards that every individual working at Rikkeisoft must comply with during their work. However, it is not a company labor regulation, and therefore, all disciplinary actions and penalties will be applied based on the company's Labor Regulations.

Rikkeisoft employees are responsible for upholding the Company's rules: Committing to comply with regulations, rules, and policies issued by the company; reporting to superiors or the Human Resources department upon discovering any violations.

Managers at Rikkeisoft must set an example in adhering to the rules, communicate and emphasize the importance of compliance to employees; guide, assess compliance, answer questions, and take timely intervention measures to prevent any risks of rule violation.

Rikkeisoft encourages employees to report violations and is committed to protecting employees who report actions contrary to the Code of Conduct. Appropriate disciplinary measures will be applied to violations to contribute to building a sustainable society, with the company aiming to further contribute to solving social issues.

February 26, 2026

**Representative of Rikkeisoft**

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**PART A: GENERAL REGULATIONS**

**I. Scope and Applicability**

- This Code of Conduct applies throughout Rikkeisoft Joint Stock Company (hereinafter referred to as “Rikkeisoft”), including Rikkeisoft Joint Stock Company, its Member Companies (entities in which Rikkeisoft directly invests or/and manages); its subsidiaries, affiliated companies (companies in which Rikkeisoft indirectly invests or/and manages through its member companies); all directly affiliated units: Representative Offices, Branches, Sales Points, etc. (if any).
- All Rikkeisoft employees, regardless of their position, are responsible and obligated to comply with this Code of Conduct.

**II. Purpose**

This Code of Conduct outlines the fundamental principles and behavioral standards applicable to all Rikkeisoft employees, regardless of their position, with the aim of:

- Promoting transparency in Rikkeisoft's production and business processes and regulations, contributing to enhancing employee responsibility towards the Company.
- Serving as a guiding principle for all daily activities at Rikkeisoft, creating a responsible and ethical work environment.
- Providing a basis for authorized individuals and units to handle responsibilities when employees violate behavioral standards during their work.

This Code of Conduct also serves as a means to communicate Rikkeisoft's policies and commitments to Stakeholders. Rikkeisoft expects respect and support from stakeholders for our Code of Conduct.

**III. Implementation Guidelines**

**1. Guidelines for All Employees**

This Code of Conduct is a foundational guide for behavior, stipulating the principles of conduct and ethical standards that all Rikkeisoft employees must adhere to during their work. However, the Code cannot cover every possible situation that may arise in daily work. Therefore, Rikkeisoft always trusts in the self-awareness and responsibility of each employee, especially the guidance and communication from management. Managers play a crucial role in helping employees better understand the Code of Conduct, as well as supporting employees when they encounter difficult situations or require guidance to act appropriately.

For every employee, when facing situations where they are unsure or unclear, employees can ask themselves the following questions to self-assess the situation:

**- Do I have the authority to take this action?**

This is the first question to ask to determine if the action falls within the scope of one's authority and responsibility.

**- Is this action consistent with the rules in the Code of Conduct?**

It is important to ascertain whether one's actions comply with the principles stipulated in the Code of Conduct. This ensures that all actions align with the company's overall objectives.

**- Is this action ethical and legal?**

Ethics and legality are fundamental pillars in all employee decisions and actions. All actions must be consistent with general ethical standards and comply with legal regulations to avoid impacting the company's and individual's reputation.

**- Will this action benefit me and enhance Rikkeisoft's reputation?**

Every employee should consider the long-term benefits of their actions. A correct action not only benefits the individual but also contributes to enhancing the company's reputation and image.

**- Would this issue have a positive impact if it were publicly disclosed in the media?**

Sometimes, work situations can have significant impacts if publicly disclosed. Therefore, each employee must ask themselves whether their actions could be made public without negatively affecting the company or the community.

If the answer to any question is "NO", or if an employee feels uncertain about their actions, it is time to seek support from their manager. Managers, with their experience and expertise, can help employees better understand the Code of Conduct and act appropriately in specific situations.

## **2. Guidelines for Managers and Executives**

### *Managerial Role:*

Managers at Rikkeisoft must not only understand and comply with the Code of Conduct but also serve as role models, guiding employees, and fostering a transparent and positive environment where regulations are applied uniformly.

### *Promoting Compliance:*

Managers must proactively disseminate and create opportunities for employees to understand the Code of Conduct and other Company policies and regulations. Employees are not only required to complete daily tasks but also to adhere to the ethical and legal standards set by the company.

Managers should encourage open communication, establish internal control systems, implement preventive measures, and prevent violations of the Code of Conduct before they occur.

*Listening and Responding:*

Managers must regularly receive and address employee feedback, ensuring that concerns are handled transparently and promptly. When necessary, they should coordinate with the Human Resources department or consult higher management for accurate guidance to employees.

### **3. Regarding Violations**

*Encouraging Reporting:*

Rikkeisoft encourages the timely reporting of any actions that violate or appear to violate Company regulations through the Human Resources department or a 24/7 reporting channel, in order to maintain a healthy work environment.

*Violating Actions:*

Includes all actions that are illegal or violate company regulations, including incitement or unintentional violations. Retaliation is an unacceptable behavior in Rikkeisoft's work environment. This behavior can cause psychological harm and endanger individuals, as well as disrupt team spirit and cooperation within the company.

*No Justification for Violations:*

No reason, including the desire to achieve work objectives or work pressure, can justify a violation. Rikkeisoft will decide to apply disciplinary measures appropriate to the severity of the violation. In cases of serious violations, the highest disciplinary action, termination, may be applied.

*Encouraging Self-Correction:*

The Company highly values the self-admission of mistakes, especially for unintentional violations, and is willing to apply reasonable leniency policies to encourage improvement.

Rikkeisoft is committed to building a transparent, fair, and responsible work environment. The Company encourages each employee not only to proactively report violations but also to possess self-awareness, recognize the importance of adhering to regulations, and be willing to correct mistakes. Concurrently, Rikkeisoft consistently respects and handles all violation cases fairly and seriously, while maintaining a healthy, equitable, and effective work environment.

## **PART B: SPECIFIC REGULATIONS**

### **I. COMPANY AND EMPLOYEES**

## **1. Human Rights and Work Environment**

### *No Discrimination*

The Company respects human rights and does not discriminate against employees based on any differences in nationality, race, color, ethnicity, religion, gender, age, education, disability, sexual orientation, gender identity, etc. The Company makes decisions regarding recruitment, compensation, benefits, promotion, termination, or retirement solely based on an employee's responsibilities, capabilities, experience, and performance evaluations in a fair manner, without any other reasons unrelated to the job.

The Company strictly prohibits discriminatory practices within the Company.

### *Prohibition of Forced Labor*

The Company does not participate in or use any recruitment system that binds employees. All compensation (if any) must comply with legal provisions. The Company does not deduct employee wages as a form of security deposit or any other fee during the recruitment process.

Upon recruitment, the Company commits not to withhold Identity Cards/Citizen IDs, passports, original professional diplomas, certificates, personal documents, or security deposits from employees.

The Company strictly prohibits any form of inappropriate behavior, including gestures, words, or physical contact that is coercive, threatening, sexually harassing, exploitative, or abusive of others for physiological purposes.

In the event of coercion or force, employees have the right to lodge complaints and report directly to leadership and the Union Executive Committee for resolution. The Company encourages employees to report any instances of forced labor they discover.

### *Protection of Minors*

The Company absolutely prohibits the employment of child labor. "Child" refers to any person under the minimum age permitted for employment by law.

### *Protection of Female Employees*

The Company respects the equal rights of female and male employees, implements measures to ensure gender equality, and prevents sexual harassment in the workplace. The Company strictly adheres to legal provisions for maternity protection, including:

- (i) Not using pregnancy or childcare status as a basis for employment decisions or discrimination during employment.
- (ii) Not assigning pregnant employees from the seventh month of gestation to night shifts, overtime, or business trips.
- (iii) Not assigning female employees with children under 12 months of age to night shifts, overtime, or business trips, unless with their consent.
- (iv) The Company shall not dismiss or unilaterally terminate employment contracts with

employees due to marriage, pregnancy, maternity leave, or childcare for children under 12 months of age.

- (v) In cases where an employment contract expires during a female employee's pregnancy or while she is caring for a child under 12 months of age, priority shall be given to renewing the employment contract.

#### *Harassment Prevention*

The Company fosters a work environment free from any form of harassment and/or sexually offensive or disrespectful behavior towards employees. Acts considered as sexual harassment in the workplace include, but are not limited to:

- Physical conduct such as touching, unwanted physical contact, groping, caressing, pinching, hugging, kissing, sexual assault, rape, indecent exposure, or molestation;
- Verbal conduct, whether direct, by telephone, or electronic means, including inappropriate social or cultural remarks, sexually suggestive jokes, comments about a person's attire or body in their presence or directed towards them, unwelcome personal invitations or persistent requests for dates, teasing, suggestive remarks, or the use of obscene or lewd language; discussing a person's sex life in front of other employees;
- "Quid pro quo" sexual harassment, defined as conduct where an individual performs or implies sexual favors in exchange for favorable evaluations, job-related promises, and/or other benefits;
- Non-verbal conduct, including unwelcome sexual acts such as suggestive body language, lewd gestures, persistent winking, finger gestures, etc. This also includes the display of pornographic materials, images, objects, computer screens, posters, emails, notes, or sexually suggestive messages. winking, finger gestures, etc. This conduct also includes the display of pornographic materials, images, objects, computer screens, posters, emails, notes, and sexually suggestive messages.

#### *Alcoholic Beverages and Stimulants*

The Company is committed to fostering a healthy work environment free from the influence of alcohol and stimulants. Each employee must adhere to the following principles:

- No consumption of alcoholic beverages (beer, wine, etc.) during working hours or business trips that may affect job performance or employee decision-making (unless authorized by competent authority).
- No possession or illegal use of strong stimulants, precursor chemicals, or narcotics (in any form: smoking, snorting, injecting, etc.).

#### *Adherence to Working Hours*

The Company adheres to a standard workweek not exceeding 48 hours. We ensure that overtime is worked with the employee's consent and that the total overtime hours do not exceed 50% of normal working hours per day. If weekly normal working hours are applied, the sum of normal and overtime hours shall not exceed 12 hours per day and 40 hours per month. Employees are entitled to at least four (04) days off per month.

Employees are entitled to at least (04) days off per month.

#### *Protection of Personal Information*

The Company complies with all legal regulations concerning the confidentiality of personal information of all individuals associated with the Company's business (including partners, employees, customers, etc.). Personal information processing activities are strictly managed to prevent illegal collection, use, disclosure, loss, or leakage to third parties. The collection, storage, use, disclosure, and other processing activities related to an individual's personal data must be based on the consent of that data subject.

#### *Confidentiality and Non-Retaliation*

The Company maintains measures to ensure the confidentiality and anonymity of information providers and employees who report violations, unless legally required to disclose information. To this end, the Company has established a communication process for employees to raise any concerns without fear of retaliation.

#### *Occupational Health and Safety*

The Company is committed to providing a safe working environment with conditions that are suitable for all individuals, including Company employees, visitors, and third-party personnel. This commitment meets or exceeds national regulatory requirements and aligns with international best practices for occupational health and safety.

Employees are provided with a convenient workspace, office equipment, and a comfortable atmosphere to develop their potential and contribute their ideas. Company employees have the right to refuse work if they deem the working conditions unsafe. Furthermore, the Company expects any employee who identifies unsafe incidents or situations to promptly report them to management.

## **II. EMPLOYEES AND THE COMPANY**

### **1. Protection and Use of Information and Assets**

#### ***1.1 Management of Company Assets***

The term "Assets" herein refers to all tangible and intangible assets that the Company has the right to possess, utilize, and dispose of.

Intangible assets include intellectual property created by the workforce and/or data generated by employees, all of which are the property of the Company.

Each employee must be conscious of protecting the Company's assets. Details are as follows:

- All employees are responsible for protecting and managing tangible and intangible assets of the Company from damage, loss, misuse, or improper use, especially when assets are
- Company assets are invested and equipped for business purposes and are not permitted for personal use by employees.

- Do not make independent decisions regarding Company Assets unless approved by the competent authority.

### *Intellectual Property*

The Company respects the intellectual property rights of others and does not infringe upon it, adhering to legal provisions on intellectual property. Similarly, all employees are required to protect the Company's intellectual property and that of its business partners, as well as respect the intellectual property rights of third parties.

Each employee of the Company commits to the Company's intellectual property, including but not limited to:

- Do not misuse the Company's Intellectual Property.
- Without prior approval, do not disclose Intellectual Property that the Company has not publicly announced.
- Protect the Company's Intellectual Property by registering, or assisting in the registration of, patents, trademarks, or copyrights where appropriate.
- Do not use the Company's Intellectual Property that you helped create during your employment without authorization.
- Do not use or copy software or materials unless explicitly permitted by a license agreement. The Company respects usage limitations set by software developers or distributors.

### ***1.2 Responsibility for Information systems***

Information systems at the Company include content related to email, internal networks, software, telephones, voice mailboxes, wireless devices, internet access, fax machines, personal computers, and other storage devices.

Throughout their employment, each employee is responsible for appropriately using Assets - Information Systems to ensure timely receipt of information and for protecting systems and data from unauthorized access, damage, or theft.

All access and use of the Company's Information Systems are monitored, and information will no longer be considered private once sent/received/stored within the Company's Information Systems. This may result in the Company intercepting or reviewing information (in cases deemed necessary by the Company).

Each employee is responsible for:

- Not engaging in activities that could harm the Company's image, brand, trademarks, and reputation.
- Not disclosing the Company's confidential information to third parties without authorization or permission.
- Not engaging in fraudulent, deceptive, destructive, or other illegal activities.

- Not accessing websites, or storing/distributing files/programs containing illegal content such as pornography, harassment, political incitement, or religious division.
- Not engaging in harassment of others via communication channels.
- Not sending chain letters, viruses, or harmful code.
- Not using another person's account without their permission.
- Not conducting information technology system testing without official approval from the Company's authorized personnel.
- Not allowing unauthorized individuals to access the Information System.

#### *Electronic Mail (E-mail)*

Employees with relevant responsibilities in the Company will be provided with an e-mail account within the Company's e-mail system.

- Employees shall use their assigned e-mail account solely for work-related communication purposes of the Company, including:
  - o Not using external e-mail systems or forums (boards, forums...) for Company work-related communication, unless the Company's e-mail system is temporarily unavailable due to technical issues.
  - o Not using the assigned e-mail account to register for or use forums (boards, forums...) not related to work purposes.

#### *Network System and Network Access*

Employees with relevant responsibilities in the Company will be granted access rights and permissions through the Company's network system, including but not limited to: LAN, WAN, Wi-Fi systems, or any other connection.

- Employees shall not use the Company's network system to access reactionary, obscene, or other illegitimate websites.
- Employees shall not access links unrelated to their assigned tasks or links suspected of containing viruses.

#### *Software*

- Personal software may only be used within the Company with the approval of the competent management and the Head of Information Technology Department.
- All employees are responsible for protecting and maintaining the Company's software.

### ***1.3 Protection of Confidential Information***

Confidential information is non-public information, including research and development projects, trade secrets, business plans, formulas, production processes, terms of supplier or customer contracts, pricing,

sales figures, bids, quotations, proposals, responses to bidders, and other non-public financial results, or any other information that could be useful to competitors of the Company or harmful to the Company if disclosed.

During their employment, employees are permitted to access confidential information to perform their duties, whether in written, oral, electronic data, or any other form, including but not limited to:

- + Information on governance and restructuring;
- + Annual, medium-term, and long-term plans;
- + Content related to litigation;
- + Marketing and business plans;
- + Competitive analysis, risk analysis;
- + Product development plans, product formulas;
- + Technology diagrams, production processes;
- + Information, research, and analysis regarding products;
- + Factory designs, product machinery designs;
- + Prices, costs, expenses, budgets;
- + Important contracts, mergers, or acquisitions;
- + Business and financial plans or forecasts;
- + Personnel information;
- + Information relating to customers, partners, potential customers, and suppliers provided to the Company in confidence shall also be considered confidential information.

Company employees are responsible for maintaining the confidentiality of information, including but not limited to:

- Do not disclose information or permit any third party to infringe upon the Company's confidential information.
- Comply with regulations regarding the collection, use, transfer, deletion, and protection of information with varying levels of confidentiality.
- Do not discuss information loudly in open environments where a third party can overhear and capture the information.
- Do not discuss confidential information with third parties without authorization or even without a non-disclosure agreement/commitment.
- Do not discuss information with Partners, Customers, or Suppliers without understanding whether

the information is confidential or not, or without approval from the competent authority.

- Do not improperly discard notes or documents containing confidential information.

Note that this duty of confidentiality is effective while the employee is employed by the Company and continues after the employee leaves the Company.

## **2. Protecting the Company's reputation, image, and brand**

- A brand is more than just a name, a logo design, or a distinctive color; it is the sum of candidates', employees', customers', and partners' perceptions of the Company, its quality, products, and services.
- A Company's reputation and brand always go hand in hand; they are extremely important and valuable assets for every business, linked to the Company's formation and development. Therefore, every employee must understand and strictly adhere to the guidelines for using the Company's brand and related publications:
  - o Effectively utilizing the Company's brand in all external publications (videos, recruitment posts, TikTok, etc.).
  - o Utilizing the Company's brand in internal Company publications (uniforms, name tags, logos, notebooks, magazines, etc.).
  - o Exercise caution when mentioning the Company outside of the workplace.
  - o Only engage with media representatives with the approval of the Board of Directors or authorized approving authorities.
  - o Do not use the Company's brand/image with indecent language or imagery, or in an untransparent personal capacity.

## **III. EMPLOYEES AND EMPLOYEES**

### **1. Relationships with Colleagues**

In relationships with colleagues, each employee must:

- Respect and listen to each other's opinions, engaging in civilized debate.
- Possess a teamwork spirit, continuously learning from each other to enhance experience.
- Be open and encourage seminars to share work experiences or life insights.
- Respect personal privacy.
- Be friendly and cheerful in communication.
- Refrain from borrowing large sums of money or valuable assets.
- Prohibit fighting, insults, and physical altercations.

## **2. Work relationships with superiors**

In relationships with superiors, each employee must:

- Respect superiors and behave appropriately to show respect (greetings, forms of address, and statements).
- Greet superiors (Company management, department heads) when encountering them in the workplace, elevators, etc.
- Diligently complete assigned tasks and duties on time.
- Strictly comply with established rules and policies.
- Do not visit the private residence of a superior without permission.
- Take responsibility for assigned reports, executing them diligently, and avoiding superficial or irresponsible work.

## **3. Work relationships with subordinates**

In work relationships with subordinates, superiors must adhere to the following regulations:

- Respect subordinates in forms of address, statements, and communication style at work.
- Always lead by example and adhere to work regulations, policies, and discipline in conduct and work style.
- Guide and direct employees when they encounter difficulties in their work.
- Ensure fair treatment for all employees within the Company.
- Address employee inquiries and questions regarding regulations, policies, and work matters openly and transparently.

## **4. Resolving workplace conflicts**

In a large collective environment, workplace conflicts are inevitable. If conflicts are not resolved, they can create a tense work environment, lead to ineffective teamwork, stress, and low productivity. Therefore, apply the following behavioral rules to resolve workplace conflicts.

### ***4.1 View the issue objectively***

Before blaming each other, one should view the issue objectively. You need to try to find the root cause of the dispute. Ideally, you should not impose your own negative thoughts on the ongoing situation.

### ***4.2 Listen to colleagues' perspectives***

In addition to arguing and blaming each other, listening is an extremely important skill. You need to listen completely to what others want to say. Even if you understand the other party's viewpoint, you should still listen attentively until the end. When you listen, all issues will gradually be resolved.

#### ***4.3 Clearly identify common interests***

During conversations or work, conflicts can easily arise due to differing opinions. However, in all situations, you and your colleagues must clearly identify common interests. This helps you find the root cause of the dispute. From there, you can find a way to resolve the conflict and reach common ground.

#### ***4.4 Clearly express personal thoughts and viewpoints***

Along with listening, you should also express your personal thoughts and viewpoints. You should present your personal views clearly, in detail, and specifically. Avoid causing misunderstandings. If you or your colleague is at fault, admitting it early will help resolve the issue faster.

#### ***4.5 Maintain a calm demeanor***

Anger and loss of composure will exacerbate the problem. When angry, we lose control of our words and actions, making the issue more complicated. Therefore, it is best to control your emotions to resolve conflicts more easily.

#### ***4.6 Jointly develop conflict resolution solutions***

Develop joint solutions together. You should actively present your personal opinions and ask questions to your colleagues. If your colleagues disagree with your proposed solution, listen to their perspective and make a reasonable choice.

#### ***4.7 Avoid negative, attacking, or provocative statements***

Limit negative and provocative statements. Do not make attacking or imposing judgments on the other party. Instead, gently share your feelings about the situation. This will make colleagues feel respected and help resolve issues step by step.

#### ***4.8 Be willing to apologize***

An apology is often difficult to give. Everyone has an ego and is unwilling to yield to the other party. Therefore, saying sorry can be challenging. However, you should learn to admit your mistakes. Be willing to apologize if you realize the issue lies with you.

#### ***4.9 Do not dwell on past events; always maintain a cheerful attitude when communicating with each other.***

We should not dwell too much on past mistakes. After all issues are resolved, communicate and work together cheerfully, positively, and enthusiastically.

## **IV. EMPLOYEES AND EXTERNAL PARTIES**

### **1. Employees and Customers**

- Ensuring customer satisfaction is the highest principle: survey and listen to customer expectations before providing products or services; research, produce, and thoroughly test products and services to ensure they best meet customer expectations; respond to customer feedback honestly and promptly; identify root causes and implement measures to prevent recurrence...

- Welcoming customers: when encountering customers in the Company's premises, greet them with a bow and yield passage (if necessary), give way in elevators, and take the next one.
- Always strive to ensure the best quality, service, and products when providing them to customers.
- Select and maintain good cooperative relationships with suppliers and partners; respect and bring mutual benefits based on legal regulations.
- Commit to strict confidentiality of information related to customer, supplier, and partner data. Customer data may only be used with permission.
- All transactions involving customers, including the delivery of goods, products, or accounts receivable, must be officially documented. These documents must be signed by all relevant parties, ensuring transparency and clarity in all transactions.
- Employees are prohibited from accepting or soliciting any form of gratuity from customers, whether in cash or gifts, to avoid any conflict of interest and protect Rikkeisoft's reputation.

## **2. Employees and Media**

- Only individuals designated by Rikkeisoft are authorized to communicate and work with the media. Before engaging with the media, employees must request to verify the journalist's credentials or the press agency's letter of introduction.
- When interacting with the media, employees must maintain a courteous and polite demeanor. Politely decline requests that are unclear, beyond one's authority, sensitive, confidential, or restricted from external disclosure.
- Limit telephone conversations: after providing explanations and guidance, a formal written response is required; do not elaborate on topics, speak off-topic, or offer commentary.

## **3. Employees and Competitors**

Rikkeisoft employees must:

- Do not make inaccurate or dishonest statements about competitors' products or services;
- Only use legal means to obtain competitive information;
- Respect the confidential information and intellectual property rights of competitors and third parties;
- Compete based on the Company's quality, reliability, and reputation;
- Do not engage in illegal activities, such as fraudulent practices, to compete with rivals;
- Do not damage the reputation of competitors when comparing their products or services to customers.

## **4. Employees and Suppliers**

When working with Suppliers, each Rikkeisoft employee is expected to:

- Comply with current legal regulations related to transactions with Suppliers;
- Maintain records truthfully and accurately;

- The selection of Suppliers is always based on defined criteria such as price competitiveness, quality, and other appropriate standards and conditions. Rikkeisoft also expects Suppliers to respect the Code of Conduct, business ethics, comply with the law, and ensure that the products and services they provide to Rikkeisoft meet standards;
- Absolutely prohibit the act of giving or receiving bribes in any form.

## **V. THE COMPANY AND EXTERNAL PARTIES**

### **1. Compliance with Laws and Regulations**

Rikkeisoft is committed to conducting business transparently, honestly, and in full compliance with the laws of all countries and regions where we operate.

The Company does not tolerate any form of legal violation – including fraud, tax evasion, labor violations, unfair competition, or intellectual property infringement.

### **2. Ethical Business Conduct**

Rikkeisoft conducts all transactions and business cooperation based on integrity, fairness, and transparency.

All decisions, whether strategic or operational, are considered based on sustainable values, professional ethics, and social responsibility—not solely on short-term profits.

### **3. Avoiding Conflicts of Interest**

The Company proactively establishes control processes to ensure that all employee actions and decisions prioritize the common interests of the company and its partners.

Do not allow personal interests or private relationships to influence transactions or agreements with third parties.

In cases where a conflict of interest may arise, the Company has a transparent mechanism for evaluation and appropriate handling.

### **4. Anti-Corruption and Bribery**

The Company does not tolerate any form of corruption, bribery, or "under-the-table" payments, whether direct or indirect. All expenses for entertainment, gifts, or favors extended to partners must:

- Comply with company policy;
- Have a legitimate business purpose;
- Be conducted with transparency, clarity, and not with the intent to influence or alter the recipient's decision.

We expect our partners to adhere to similar ethical standards.

### **5. Environmental Protection**

The Company is committed to conducting business in a sustainable and environmentally responsible manner:

- Comply with environmental protection standards and legal regulations;
- Minimizing emissions, efficient resource utilization, and promoting green solutions;
- Prioritizing collaboration with suppliers and partners who share common values regarding the environment and sustainable development.

We believe that a successful business must be linked to the responsibility of protecting the planet and the communities in which it operates.

## **6. Social Responsibility**

We are committed to being a socially responsible enterprise, not only creating economic value but also contributing positively to the communities and society in which we operate.

Respect for human rights: We oppose all forms of discrimination and forced labor.

## **VI. GRIEVANCE AND FEEDBACK MECHANISM**

Rikkeisoft understands the importance of stakeholders connected to our business operations. Therefore, Rikkeisoft has established and issued a grievance and feedback mechanism to ensure stakeholder engagement. Accordingly, internal and external stakeholders of Rikkeisoft can provide feedback regarding business operations through the following channels:

### **1. Direct Grievance**

- Direct Manager (Head of Department, Direct Supervisor...)
- Specialized Departments: Human Resources, Legal Department...
- Grassroots Trade Union: Executive Committee, Trade Union President
- Board of Directors, Board of General Directors

### **2. Indirect Grievance**

- Email: [hotline@rikkeisoft.com](mailto:hotline@rikkeisoft.com). This mailbox will automatically forward emails to the CEO, CFO, and the legal affairs officer;
- Send letters to the Company's headquarters/office address;
- Messages, Facebook, Zalo;
- Through meetings (team meetings, periodic dialogues...);
- Workplace dialogues;
- Collective bargaining.

**Anyone with concerns or questions related to this Code of Conduct may contact Rikkeisoft through the above channels, and Rikkeisoft will respond in a timely manner.**

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Board of Directors 26/02/2026.

**The Company commits to operating in accordance with the Rikkeisoft Code of Conduct**

**Signed**