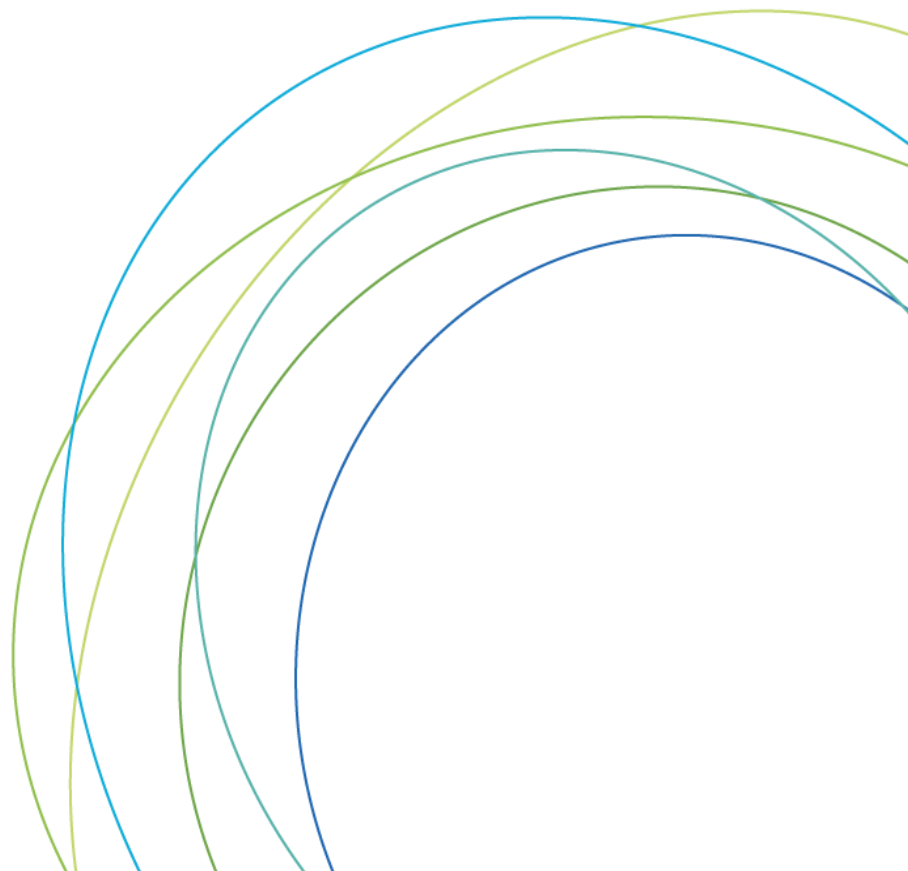




# TMG's STANDARD OF BUSINESS ETHICS FOR SUPPLIERS

**CODE OF  
BUSINESS  
CONDUCT**

[www.tmggroup.vn](http://www.tmggroup.vn)



## LETTER FROM TRAN TRONG KIEN, CHIEF EXECUTIVE OFFICER

Our purpose and values define the way we work together and perform as a business. We want to constantly demonstrate our commitment to being a trusted and respected company. We ask our customers, consumers, shareholders, governments and the communities in which we operate, to trust that we understand our responsibility as a responsible travel business and that we behave accordingly.

We aim to achieve high performance in our supply chains through developing mutually rewarding relationships with suppliers who deliver excellent service, consistently achieve our quality standards, manage business risks, drive out cost and innovate to increase value. Equally we expect and encourage our suppliers to commit to achieve high standards and consistent progress in business ethics and sustainability.

This document sets out our minimum compliance standards. We expect these minimum standards to be in place and we will enforce them contractually. It also sets out the aspirations for our longer term partners to be working towards with us. As a regional company we recognize that achieving these standards and aspirations presents unique challenges in different parts of the world. Therefore we understand that while there will be varying degrees of performance, we will strive for continuous improvement. So that, going forward together with our suppliers, we will consistently drive up standards together and achieve excellence.

At the end of the document we set out how we will work with suppliers to ensure that these standards are delivered. TMG expects any violation or falling short of these standards to be reported by the supplier in order that a plan to correct the situation can be devised.

The way in which we work to achieve the standards will evolve. Our commitment to an ethical and sustainable supply chain is absolute.

Thank you,



**Tran Trong Kien**  
*Chief Executive Officer*

OUR STANDARD BUSINESS ETHICS AND INTEGRITY ■

**TMG is intent on constantly demonstrating our commitment to being a trusted and respected company**

As such, we have created our own Code of Business Conduct which sets out the standards expected of all employees and agents acting on behalf of the company.

**As a minimum we expect all our suppliers to:**

- have a clear commitment to work against corruption in all its forms, including extortion and bribery
- meet all relevant legislation

TMG adheres to the laws and regulations of each country in which we operate.

We strongly encourage our suppliers to adopt fuller and clearer commitments of business ethics like those within our own Code of Business Conduct outlined below.

Similarly, suppliers have a right to expect our employees to act in line with these standards.

**Gifts and entertainment**

The giving and receiving of gifts and entertainment have a role to play in building business relationships and generating goodwill. However, they should never create improper influence or obligate the recipient. TMG employees should not provide or accept excessive or inappropriate entertainment and must only ever offer or accept gifts occasionally and that are of modest value.

**Conflicts of interest**

All TMG employees owe a duty of loyalty to TMG. Where our personal, social, financial or political activities interfere or could interfere with our loyalty to the company, a conflict of interest may exist.

Even the appearance of a conflict can be damaging. TMG employees and our suppliers should avoid situations where a conflict of interest may occur.

**Bribery and improper payment**

TMG will not condone, under any conditions, the ordering or receiving of bribes or any other form of improper payments, including what are known as 'facilitating payments'. Even the appearance of a breach of anti-bribery or anti-corruption laws could do significant damage to TMG's reputation.

**Competition and anti-trust**

All TMG suppliers must comply with all anti-trust and competition laws which apply to our business.

**Money laundering**

It is TMG's policy that any payment by TMG to a vendor, supplier or other third party must be made to a bank account titled in the name of the contracted vendor, supplier or other third party.

**Confidential information**

TMG respects the confidential information of others. We will never seek to obtain or disclose the confidential information of other companies, whether it comes to us directly or from third parties and we expect our suppliers to do likewise.

*For full details of our Code of Business Conduct please refer to [www.tmggroup.vn](http://www.tmggroup.vn)*

HOW WE WORK WITH OUR SUPPLIERS ■

**Managing the social and ethical risk**

We have a wide and diverse range of suppliers. We have developed a comprehensive but flexible 4-stage process for identifying, assessing and managing the social and ethical risk in our supply chain. It allows us to focus on the areas of greatest risk and greatest potential benefit. It enables us to work cooperatively with our suppliers to mitigate the risk and maximize the benefits.

**Stage 2 – pre-qualification**

Our standard procurement ‘prequalification process’ includes a questionnaire which covers a series of key questions on social and ethical risks, with particular focus on areas of concern raised in Stage 1. We use this questionnaire for both potential new and existing suppliers, on a regular basis.

**Stage 4 – audit**

Suppliers who are judged to represent the highest potential risk (on the basis of the three previous stages) are then audited by our Internal Audit function. By working with these suppliers to improve standards, we are ultimately able to broaden the scope of our potential supply base.

We reserve the right to undertake unannounced audits where we feel it is necessary.

**Stage 1 - screening**

We conduct an initial screening of our suppliers by considering the following associated risks:

The performance history of the supplier - to consider possible risks

How closely the goods/services are associated with our priority brands.

**Stage 3 – qualification**

All of our supplier’s identified from the above process as ‘potentially high-risk’, must register and complete a self-assessment questionnaire to provide us with more information.