



THE WAY WE WORK AT TMG

TMG SPEAKUP POLICY

1 TMG Speakup Policy

TMG seeks to conduct its business honestly and with integrity. We expect all staff to maintain high standards of business conduct and to report any wrongdoing that fall short of these fundamental principles. It is the responsibility of all employees to raise any concerns that they might have about malpractice within the workplace. In general, this policy covers actions or omissions that are illegal, contrary to policy or established procedures or outside the scope or any individual's authority, actions which could damage TMG's reputation and assets.

Pursuant to the decision made by the Board of Directors of TMG and applicable regulatory requirements, it is the policy of TMG to establish, maintain, and develop procedures for a confidential and/or anonymous channels to facilitate (1) the receipt, retention and treatment of concerns expressed by our people regarding TMG's accounting, internal controls, auditing matters or violations of TMG Code of Business Conduct. To meet these needs, TMG has developed this Speakup Policy:

A genuine concern should be reported if there are reasonable grounds to believe that there is:

- Suspected or actual non-compliance with TMG's Internal Regulations;
- Suspected or actual frauds in respect to the day-to-day managements of TMG's and its subsidiaries' businesses;
- Fraud or deliberate misstatements in the recording and maintaining of financial records of TMG and its subsidiaries;
- Deficiencies in or non-compliance with TMG and its subsidiaries' internal policies and controls;
- Misrepresentation or a false statement by or to a director, officer or employee of the company or any of its subsidiaries respecting a matter contained in the financial records or deviation from full and fair reporting of the Company's financial condition; and
- Violation of or non-compliance with TMG's Code of Conduct, including violation of or non-compliance with communication with this Speakup Policy.

To ensure that all directors, officers and employees of the Company are aware of this Speakup Policy, a copy of this Policy will be distributed to all directors, officers and employees. All directors, officers and employees will be informed whenever significant changes have been made to this policy. All new directors, officers and employees will be provided with a copy of this policy together with TMG Internal Regulations and advised of its importance.

2 Whom to Report to

Any person with a concern may submit their concern in writing by one of the following methods:

By direct contact with:

Chairman of TMG Risk and Audit Committee

Name: Tran Trong Kien
Email: kien@tmggroup.vn
Mobile phone: +849 8730 9988 (or +849 7347 0161)

Legal Department

Name: Nguyen Thi Thanh Hai
Email: haint@tmgroup.vn
Fixed line number: 04 3926 3148. Ext: 341

HR Department

Name: Ninh Hong Hanh
Email: nhanh@tmgroup.vn
Fixed line number: 04 3828 0702. Ext: 120

By telephone or email on a confidential and anonymous basis through Speakup hotline:

TMG Private Hotline

Tel: +849 8453 0738

Email: tmgSpeakup@tmgroup.vn

This hotline service will maintain your anonymity if you so request. However, use of a non-identifiable or third party email address may also be used to maintain anonymity.

3 No Retaliation or Adverse Consequences

No director, officer or employee who in good faith reports concerns or provides assistance to the Internal Control Department or management of TMG regarding such a report shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a concern or a violation in good faith is subject to disciplinary action up to and including termination of employment. All of our other stakeholders who act in good faith shall also suffer no consequences for bringing about legitimate matters to Board of Directors for consideration.

4 Acting in Good Faith

This Speakup Policy is intended to encourage and enable directors, officers, employees and all of our other stakeholders to raise serious concerns within TMG rather than seeking resolution outside TMG. Anyone filing a report must be acting in good faith and have reasonable grounds for filing a report. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

5 Handling of Reported Violations

Person receiving a complaint will process the complaint and prepare a report within 24 hours of receipt or sooner. The completed report is then promptly forwarded to the Chairman of TMG Audit and Risk Committee. TMG's Board of Directors shall address all reported concerns or complaints, including those regarding compliance with internal or external regulations and TMG Code of Business Conduct violations. All reports will be promptly investigated by TMG Audit and Risk Committee and appropriate corrective action will be taken if warranted by the investigation.

In some circumstances, the use of a reputable advisor may be utilized to assist the Board of Directors in its review and decision-making process.

6 Confidentiality

TMG encourages individuals to put their name to concerns which they raise in case additional information is required further into the investigation. However, employees can raise their disclosure anonymously or ask that their identity is not disclosed. Anonymous disclosures will be investigated to the extent they can be without revealing your identity.

If you make an anonymous disclosure you will be given a unique identifier number that you can quote in subsequent conversations with the investigation team. This will allow you to continue an ongoing dialogue with them as investigations progress.

7 Anonymity

TMG is committed to protecting employees in making genuine disclosures and all reasonable efforts will be made to ensure that anonymous disclosures remain anonymous. Anonymity cannot be guaranteed in certain circumstances (e.g., court orders).

8 Retention of Records

TMG's Board of Directors shall retain records relating to any concern or report of a retaliatory act and to the investigation of any such report for a period judged to be appropriate based upon the merits of the submission. The types of records to be retained by the TMG's Board of Directors shall include records of all steps taken in connection with the investigation and the results of any such investigation.

9 Review of Policy

TMG's Board of Directors will review and evaluate this Policy on an annual basis to determine whether the Policy is effective in providing an appropriate mechanism to report violations or concerns.