



**MAYBANK SECURITIES LIMITED**  
**CODE OF ETHICS AND CONDUCT POLICY**

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Effective Date: 18/12/2025



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## OUR PURPOSE

Maybank Securities Limited ("MSVN") is a securities company established and operating under the laws of the Socialist Republic of Vietnam. As a subsidiary of Maybank Group, MSVN upholds the Group's commitment to integrity, professionalism, and ethical conduct in all aspects of its business operations.

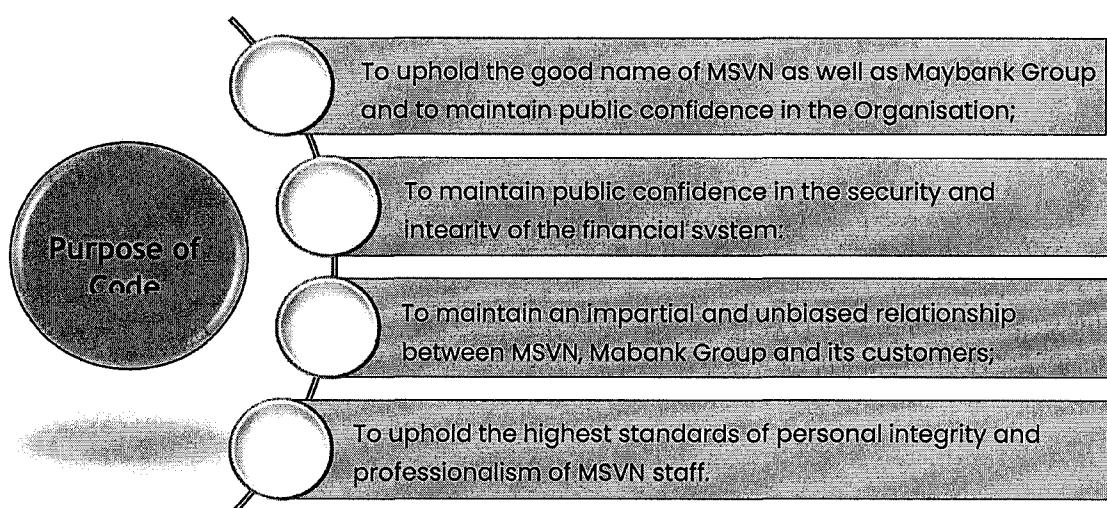
As part of Maybank Group, a custodian of public funds, MSVN recognises its responsibility to safeguard integrity and credibility in the financial system. We are here to help our clients, customers, investors and societies drive sustainable economic prosperity and social development by making a positive effect on them. This is necessary to preserve depositors' and investors' confidence in the business of the Group and its subsidiaries.

As we know, the public places a very high level of trust and confidence on our staff, especially those involved in higher responsibility. In fact, we owe this to our customers and it is everybody's responsibility to ensure that our Organisation is professionally managed and soundly based. Employees are expected to carry out business activities and represent the company with the highest standards of conduct in letter and in spirit of the Code of Ethics.

As such, it is necessary to have documented ethical rules to be issued as guidelines in order to achieve such a level of conduct and behaviour for every employee.

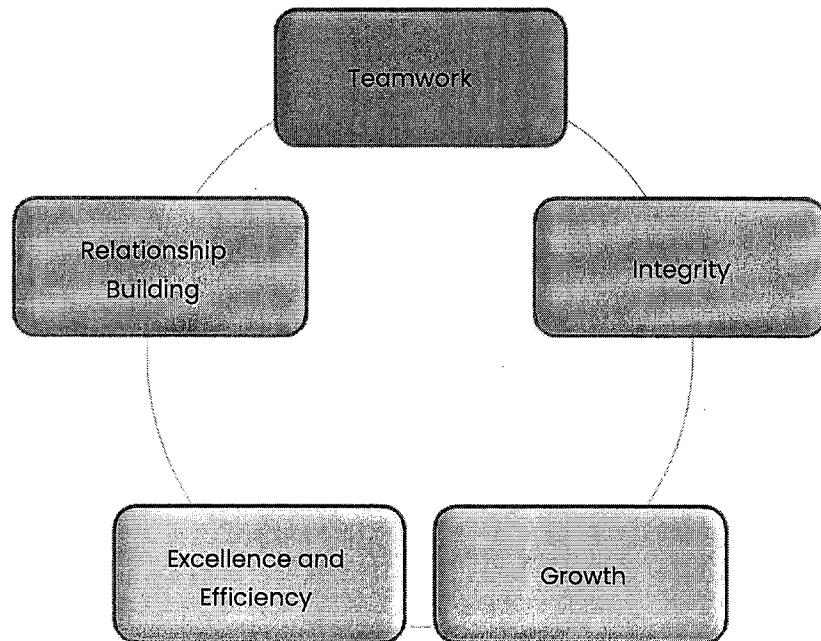
This Code of Ethics and Conduct stipulates the sound principles that will guide all employees in MSVN in discharging their duties. It sets out the standards of good practice in financial service industry. We encourage collaboration, cooperation and inclusion, knowing that each of them will perform to the highest expectations.

MSVN adopts the principles set out in the Code of Ethics for the Financial Services Industry. All employees in MSVN are to discharge their duties in accordance with the principles set out herein.





## OUR VALUES



**T** Teamwork: Staff should always work together with one another. Strong teamwork boosts staff productivity, which makes them more efficient.

**I** Integrity: Staff should earn trust and loyalty of clients, stakeholders, communities and one another through behaving honestly and maintaining high ethical expectations.

**G** Growth: Staff must always build their strength and grow their skills as it better equips them for their role. It also adds more value to the work committed and benefits them as well as the Maybank Group.

**E** Excellence and Efficiency: Staff should exhibit excellence and efficiency at all times. Maybank Group is dedicated to creating sustainable value by balancing risks and returns responsibly and prioritising long-term success over short-term gain. We do this by implementing relevant and appropriate environmental, social and governance policies.

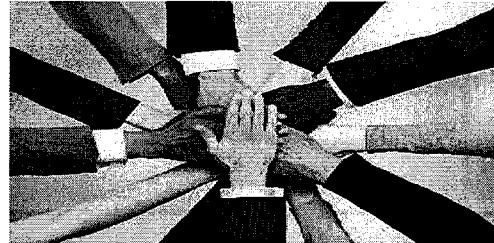
**R** Relationship Building: Staff should participate in open dialogue and strive to learn about them, not just with colleagues but also with clients, stakeholders and the wider community.



## COVERAGE OF THE CODE

### Who must follow the Code?

This Code of Ethics and Conduct (“the Code”) applies to all staff working in MSVN. The Code describes the expectations we have about everyone's behaviour and acts. By committing to the Code, you are pledging to our purpose, values and belief. We view our priorities through the lens of our mission of



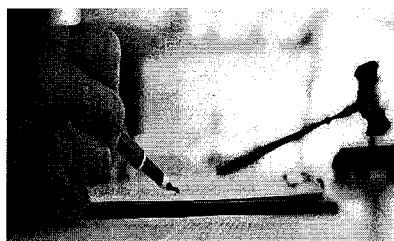
‘Humanising Financial Services’. Certain clauses will continue to apply to the staff even after they have ceased employment with MSVN.

This Code of Ethics and Conduct is to be read appropriately in accordance with the relevant legislations (if any) in Vietnam. MSVN employees are also required to refer to the MSVN Employee Guidelines/Handbook.

All employees in MSVN are bound to observe all legislations which may have a more comprehensive coverage of the subject matters contained in this Code.

The provision of this Code is deemed to be part of the Terms and Conditions of Service for all employees.

### Failure to follow the Code



When concerns emerge about a failure to operate within the Code's boundaries, rest assured that all inquiries or decisions on staff discipline actions would be driven by our firm values of equal transparency. Failure to obey the Code would be taken very seriously by us and it may lead to disciplinary action. If any laws or rules have been violated, this process will include other officials.

*Image source: Google*



## 1. CONFLICT OF INTEREST

Staff must not engage directly or indirectly in any business or activity that competes or conflicts with MSVN's interest. This Code, amongst others, identifies activities that may give rise to a conflict of interest and governs restrictions and manages risks associated with such activities. These activities include, but are not limited to the following:

**a. Outside Financial Interest in Family Business or Company\***

Where staff has an outside financial interest, whether or not in a customer, whether as a sole proprietor, partner, shareholder, creditor or debtor, such an interest must be disclosed immediately to the staff's immediate supervisor who in turn should report to the management. Thereafter, the staff should not be directly involved in MSVN's dealings with the customer so long as the interest continues to exist.

The written approval of the CEO of MSVN or MSVN Human Resources (HR) Head or any other designated person appointed by CEO of MSVN should be obtained prior or immediately upon being involved in any outside financial interest in a family business whether by way of acquisition of shares, interest or directorship. Approval may be granted only where the interest of the MSVN will not be prejudiced.

The criteria to be taken into consideration by the CEO of MSVN or Head of HR, MSVN or any other designated person when assessing a request under Clause 1(a) herein are set out in **Addendum 1A, Section 1. The conditions** that may be imposed by management when granting the approval are set out in **Addendum 1A, Section 2** hereto.

When a conflict of interest arises either between MSVN and its customers or between the staff and the customers and where such conflict is apparent, HR should be consulted. Upon prior consultation with HR, and should the conflict of interest continue to exist, supervisors should inform the customer of the apparent conflict of interest.

In assigning duties, supervisors should not place their subordinates in situations where conflict of interest could arise.

\*These refer to shareholdings and may include directorships of a Non-Executive nature in a staff's family business or family owned private company.

**b. Other Financial Interest or Business Activity\***

It is considered a conflict of interest if a staff conducts business other than MSVN's business during working hours.

Where the acquisition of any business interest (including shareholding) or participation in any business activity (including directorship) outside MSVN and working hours could



demand excessive time and attention from the staff, thereby depriving MSVN of the staff's best effort on the job, a conflict of interest also arises.

The written approval of the CEO of MSVN or Head of HR, MSVN or any other designated person appointed by management should be obtained before the staff embarks on other business activities. Approval should be granted only where the interest of MSVN will not be prejudiced.

The criteria to be taken into consideration by the CEO of MSVN or Head of HR, MSVN or any other designated person appointed by management when assessing a request under Clause 1(b) herein are set out in **Addendum 1B, Section 1**. The conditions that may be imposed to the approval granted are contained in **Addendum 1B, Section 2** hereto.

The above restriction does not apply in cases where staff has holdings of publicly quoted securities unless the management considers the interest to be material, and the financial interest is considered likely to impair the objectivity of the staff concerned. In any case, holdings of five (5) percent or more of the voting shares of a public quoted company would be regarded as material.

\*These refer to shareholdings and may include directorships of a Non-Executive nature in a private business or company.

**c. Other Employment\***

Before making any other employment commitment, staff is to discuss with management on possible part-time employment or other business activities outside the financial institution's working hours. The written approval of the CEO of MSVN or Head of HR, MSVN or any other designated person appointed by management should be obtained before the staff embarks on a part-time employment or other business activities. Approval should be granted only where the interest of Maybank Group and MSVN will not be prejudiced.

The criteria to be taken into consideration by the CEO of MSVN or Head of HR, MSVN or any other designated person appointed by management when assessing a request under this clause are set out in **Addendum 1C, Section 1**. The conditions that may be imposed to the approval granted are contained in **Addendum 1C, Section 2** hereto.

\*These refer to a contractual arrangement, where the staff commits to a part-time employment with an external employer, whether on a permanent or contract basis.

**d. Corporate Directorship\***

Staff is prohibited from soliciting corporate directorship and should not serve as a director of another public listed corporation without the approval of the MSVN Board of



Members. Staff who hold directorships without such approval must seek approval immediately, if they wish to remain as directors of other corporations.

The criteria to be taken into consideration by the Board of Members when assessing a request under this clause are contained in **Addendum 1D, Section 1** and the conditions that may be imposed are contained in **Addendum 1D, Section 2** hereto.

\*These refer to Directorships in public listed corporations.

**e. Industry Appointments/Directorships of Non-Profit Public Service Corporations**

Staff may seek approval to serve in Financial Institutions or Non-Financial Institutions related Associations, Professional Bodies and Entities. Staff who wishes to serve on any such industry related institutions, would require prior written approval from the CEO of MSVN or Head of HR, MSVN.

Staff may request to serve on the Board of Directors or Board of Trustees of non-profit public service corporations, such as religious, education, cultural, social, welfare, philanthropic or charitable institutions with prior written approval from the CEO of MSVN or Head of HR, MSVN or any other designated person appointed by management.

The criteria to be taken into consideration by the CEO of MSVN or Head of HR, MSVN or any other designated person appointed by management when assessing a request under this clause are set out in **Addendum 1E, Section 1** and **the conditions** that may be imposed are contained in **Addendum 1E, Section 2** hereto.

**f. Active Affiliation with Political Activities**

MSVN maintains a position of political neutrality. In Vietnam, employees may voluntarily decide whether or not to become members of the Communist Party of Vietnam or other lawful socio-political organisations.

Employees who are Party members are expected to ensure that their political participation in such organisations does not interfere with their job performance, responsibilities, or the interests of the Company.

Employees shall not use the Company's name, position, resources, or influence for any political purposes or activities. Any form of political engagement that could reasonably be perceived as representing the views or position of MSVN must be strictly avoided.

**g. Entertainment & Gifts**

Giving and receiving of gifts can affect or be seen to affect business judgment hence may give rise to a conflict of interest. In such circumstances employees are to strictly comply with the MSVN Anti-Bribery and Corruption Policy & Procedure when it comes to



receiving or giving of gifts and receiving or giving of entertainment to/from any third parties, including but not limited to the MSVN's customers, suppliers/vendors or consultants.

**h. Credit Facilities**

Staff should not approve credit facilities or any other transactions:

- a. To themselves;
- b. To any of their family members; and
- c. To firms, companies or corporations in which they or their family have an interest.

Staff should not derive any improper benefits either in kind or in monetary at the expense of MSVN or its customers.

Staff also should not obtain for themselves or any of their family members any property or any business advantage that properly belongs to MSVN or to its customers.

**i. Trusteeships**

Staff must not solicit appointment as executors, administrators or trustees of the MSVN's customers' estates. If such an appointment is made and the staff is beneficiary of the estate, his signing authority for the estate's bank account(s) must be approved by the Board of Members who will not unreasonably withhold approval.

## **2. MISUSE OF POSITION**

- 2.1 Staff should not abuse their position in MSVN to take advantage of any information obtained in the course of duty for personal benefit or for the benefit of other persons.
- 2.2 Staff should not make use of their position in MSVN to solicit or receive favours from the MSVN's customers in exchange either for:
  - granting them facilities offered by MSVN;
  - granting them favourable MSVN's terms and conditions; or
  - deliberately not exercising due diligence on delinquent accounts for a favour.
- 2.3 Staff should not bribe customers when soliciting business. Corporate gifts offered or presented to customers on marketing trips and gifts offered for opening accounts or promotion campaigns are not considered examples of bribes.
- 2.4 Staff should not solicit the following from customers or other parties:

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- favours;
- preferential or concessionary offers; or
- gifts of any form, including cash, bonds, negotiable securities, personal loans, airline tickets, discounts or use of vacation or other entertainment facilities or property.

2.5 Staff should, whenever possible, discourage their customers and brokers from offering them personal gifts, favours or services.

2.6 Staff should not make use of their position in MSVN:

- a. To solicit corporate directorships from MSVN's customers, unless the member of staff is appointed to the Board to represent MSVN's interest; or
- b. To borrow from or become indebted to these customers.

2.7 It is the duty of all staff to ensure that no other staff in MSVN should misuse his or her position in MSVN. Staff who are aware of any such irregularities in the course of their work owes a duty to report such irregularities in confidence to MSVN.

2.8 Staff must not use MSVN's name or facilities for personal advantage in political, investment or retail purchasing transaction, or in similar types of activities. Staff and their relatives, must not use their connections with MSVN to borrow from or become indebted to customers or prospective customers. The use of position to obtain preferential treatment, such as in purchasing goods, shares and other securities, is strictly prohibited.

2.9 Further, staff must not use MSVN's facilities and influence for speculating in commodities, gold, silver, foreign exchange or securities, whether acting personally or on behalf of friends or relatives. Such misuse of position may be grounds for dismissal. Staff should also not provide mutually beneficial transactions to staff of other institutions in return for similar facilities designed to circumvent the provisions contained in this Code. Note: Under this clause, reference to 'customers' wherever it appears also include reference to 'vendors/suppliers of goods and services.

### **3. MISUSE OF INFORMATION**

3.1 Staff should not copy, remove or make use of any information obtained in the course of business for the direct or indirect benefit of themselves or of any other persons.

3.2 It is regarded as a misuse of such information if a staff uses information of MSVN or customers to benefit themselves or confer an advantage on themselves or any other persons.



- 3.3 Staff in possession of confidential information should not use it in the following ways for the benefit of themselves or any other persons:
  - a. To influence any customer or any third party in dealing in any transaction; or
  - b. To communicate such information to any customer.
- 3.4 The above prohibitions relating to the misuse of information continues even after the staff ceases to be employed by MSVN.
- 3.5 Staff in one division, department or branch should not retrieve or obtain information of MSVN or customer from another division, department or branch unless the information so received is necessary in their course of work. Any transmission or transfer of information among the divisions, department or branches should be properly authorized.
- 3.6 Staff shall not deal in securities of any company listed or pending listing on a stock exchange at any time when he is in possession of information, obtained as a result of his employment by, or his connection with MSVN which is not generally available to shareholders of that company and the public, and which, if it was so available, would likely bring about a material change in the market price of shares or other securities of the company concerned.
- 3.7 A staff who possesses insider information is also prohibited from influencing any other person to deal in the securities concerned or communicating such information to any other person, including other staff who do not require such information in discharging their duty.

#### **4. INTEGRITY AND ACCURACY OF RECORDS / TRANSACTIONS**

- 4.1 Staff should ensure that accurate and complete records of MSVN's operations are kept and maintained in such a form and for such a period as determined by the MSVN. These records include the following:
  - a. Books, slips, documents, statement;
  - b. Computer tapes and diskettes;
  - c. Computer programmes;
  - d. Microfiches/microfilms; and
  - e. Computer print-outs.
- 4.2 Staff should never make entries or allow entries to be made for any account, record or document of MSVN that are false or would obscure the true nature of the transactions as

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well as to mislead the true authorization limits or approval by the relevant authority of such transactions.

- 4.3 Staff should ensure that any alteration or deletion to records is properly authorized by their superiors. Any removal of records must also be properly documented.
- 4.4 Staff must ensure that MSVN's information and records are not copied by unauthorised persons including computer vendors.
- 4.5 Staff should report to their superior immediately upon discovery of any unauthorised copying, entries, deletions or alterations in MSVN's records.
- 4.6 All records and computer files or programs of MSVN, including personnel files, financial statements and customer information, must be accessed and used only for the management-approved purposes for which they were originally intended.
- 4.7 Staff of MSVN must comply with all applicable laws and regulations of Vietnam governing the integrity and accuracy of the Company's records, reports, and documents. Under Vietnamese law, any director, manager, auditor, employee, or agent of a licensed securities company who intentionally makes false entries, omits, alters, conceals, or destroys any record, report, or document of the Company may be subject to criminal penalties.

Employees are therefore reminded to ensure that all information, data, and records are prepared, maintained, and reported truthfully, accurately, and in full compliance with applicable legal and regulatory requirements.

## **5. FAIR AND EQUITABLE TREATMENT**

- 5.1 All business dealings on behalf of MSVN with current and potential customers, with other members of the staff and with all those who may have caused to rely upon MSVN, should be conducted fairly and equitably. Staff must not be influenced fairly by friendship or association, either in meeting a customer's requirements or in recommending that they be met. Such decisions must be made on a strictly arm-length business basis. All preferential transactions with insiders or related interest should be avoided. If transacted, such dealings should be in full compliance with the law, judging on normal business criteria basis and fully documented and duly authorized by the Board of Directors or an independent party.
- 5.2 No member of staff shall offer any bribe or similar consideration to any person or company in order to obtain business for MSVN. Any commissions paid or other payments made, or favorable terms conceded, or other advantages given, by any staff member in the conduct of MSVN's business shall be in accordance with MSVN's policies on such matters as notified from time to time and shall be promptly recorded in writing.



## **6. RELATIONSHIP WITH CUSTOMERS**

- 6.1 Staff should draw customers' attention to the terms and conditions governing each service provided by MSVN, including all applicable service charges.
- 6.2 Staff should respond readily and promptly to customers' enquiries on the terms and conditions of the services offered by MSVN, including the applicable fee and charges.
- 6.3 For matters of abnormal or of suspected abnormal nature in a Branch/Department (such as fraud/defalcation, robbery/theft, cash discrepancy and loss of important document), the Branch Manager or Head of Unit/Sector should immediately inform Head of Internal Audit and Country CEO of Vietnam giving all the information required in the format specified by MSVN.
- 6.4 Branch/Department should report all customer complaints promptly to the Customer Services Department and copy to Head of HR and Head of Internal Audit of MSVN.

## **7. CONFIDENTIALITY**

- 7.1 The confidentiality of relations and dealings between MSVN and its customers is paramount in maintaining MSVN's reputation. Staff is required to keep confidential on all information relating to MSVN's customers including information regarding their accounts and transactions. MSVN's employees have been enforced should always abide the Personal Data Protection Law.
- 7.2 Staff should not remove or relocate documents or records of customers out of their divisions/departments/branches without the prior approval of their respective managers or department heads.
- 7.3 Staff has a duty to continue protecting the confidentiality of customer information even after cessation of employment with MSVN and except with the MSVN's consent, staff shall not divulge or to make use of any secret, copyright material or any correspondence, accounts or dealings of MSVN or its customers. No staff shall in any way use information so obtained for financial gain.
- 7.4 Staff should not reveal to third parties any names or other information in connection with any dealings or transactions with any customer.
- 7.5 Confidential information concerning a customer may be given or made available to third parties only with prior written consent of the customer, when disclosure is authorized under any laws and regulations of respective countries to be made to a police officer investigating into an offence specified in such law, regulations and other permitted disclosures.



## 8. MAKING PUBLIC STATEMENTS

- 8.1 All staff shall not, during or after termination of his employment with the MSVN:
  - Publish or cause to be published or circulate any articles, statements, books, photographs or letters; and/or
  - Give away any interview or broadcast or deliver any lectures or speeches on any matter which concerns his duties or the policies, decisions or the business of MSVN or any matter connected with MSVN without obtaining the prior written consent of MSVN.
- 8.2 For making public statements, the following designated posts are exempted from seeking written permission from MSVN if the act is in line with the discharge of official duties of the staff:
  - Chairman of MSVN;
  - CEO;
  - MSVN EXCO Member; and
  - Any spokesmen or persons so designated by Chairman or CEO of MSVN to do so.
  - If permission is granted, it shall be subjected to an implied condition that:
    - a. The proposed publication shall not be published as may reasonably be implied that it had received official support or backing or sponsorship from MSVN; or
    - b. The proposed publication shall not bear the words "approved publication" or words to that effect.
- 8.3 Staff wishing to seek permission to publish or write a book or article based on official information must write to Head of HR, MSVN or any other designated persons, giving details of the proposed publishing of the book or the article.

## 9. SOCIAL MEDIA USAGE

- 9.1 When using social media such as, but not limited to, personal blogs, social media including but not limited to Facebook or Twitter, employees are to be mindful that they do not disclose confidential information about MSVN's business, its customers and all other matters related to MSVN. Employees are not authorized to make any commentaries on behalf of MSVN or the Maybank Group and especially those that would adversely affect the image and reputation of MSVN or the Maybank Group. Employees are prohibited from using/editing the MSVN's or Maybank Group's logos, pictorial images



related to MSVN or the Maybank Group and trademarks in their own personal social media accounts. Further, employees are required to comply with MSVN's as well as the Maybank Group's Social Media Usage Policy, Social Media Guidelines, IT Policy on Usage of Internet and IT Policy on Usage of Email when using social media.

## **10. INTEGRITY OF THE SECURITIES AND FINANCIAL SYSTEM**

- 10.1 Staff has the duty to protect the integrity of the securities and financial system. They should not lend themselves to any scheme which could subvert the integrity of the securities market, financial system or MSVN's reputation.
- 10.2 Staff should be vigilant against any attempt to use MSVN's product and services, or facilities for illegal purpose or activity, in particular money laundering and terrorism financing.
- 10.3 To prevent the misuse of MSVN's services for illegal purposes, staff should satisfy themselves on the identity of persons seeking to open any securities trading or investment account by verifying their identification documents such as identity card or passport, or other official documents as prescribed by relevant MSVN's policies and procedures.
- 10.4 Staff should follow strictly MSVN's procedures relevant to each particular transaction. These procedures include verification of customers' identities and assessing customers' honesty, integrity, commercial ability and creditworthiness. The extent of the verification will be in accordance to the nature of the services sought by the customers and the duties prescribed for the staff who attends to the customers.
- 10.5 When a staff suspects that a prospective customer may be involved in illegal activities, the staff should decline to open any account for the customer or provide any other banking service and report to his/her immediate superior.
- 10.6 When an account has already been opened, the staff should inform his/her superior immediately, who should seek the closure of the account as soon as possible as permitted by any contractual and statutory obligations to the customers.

All events such as those in Clause 10.5 above should be properly documented.

## **11. REQUIRED KNOWLEDGE AND COMPLIANCE**

- 11.1 Staff, particularly at the senior level, should keep up-to-date with and comply the applicable laws, rules and regulations in their respective area of operations.

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- 11.2 Line Managers are required to take reasonable steps to ensure that their subordinates are kept informed of and are familiar with all applicable laws or regulations relevant to their respective operations. They should up-date their subordinates on any change in such laws or regulations.
- 11.3 Staff who are not familiar with the laws and regulations applicable in their area of operations should seek guidance from their immediate superior.

## **12. PECUNIARY EMBARRASSMENT**

- 12.1 Staff is expected to manage their financial matters well. MSVN takes a very serious view such "pecuniary embarrassment" i.e. the state of one's indebtedness.
- 12.2 Staff is deemed to be in state of pecuniary embarrassment:
  - a. Where he is a judgment debtor, for as long as the judgment debt remains unsettled and a stay of execution has not been granted; or
  - b. Where he is a bankrupt or an insolvent wage earner, for as long as he remains as an undischarged bankrupt or for as long as any judgment against him in favour of the official assignee remains unsatisfied and a stay of execution has not been granted.

## **13. AVENUE TO EXPRESS VIEWPOINT OR COMPLAINT**

- 13.1 Staff may express their viewpoint or their complaint on any matter or person with MSVN's interest at heart direct to the Head of HR, MSVN in writing.

## **14. PROHIBITED CONDUCT OF PERSON IN POSSESSION OF INSIDE INFORMATION**

- 14.1 MSVN and its staff should observe all provisions contained in this Code and in addition to the requirements of applicable Vietnamese laws and regulation that prohibits any person from using inside information to:
  - a. acquire or dispose of, or enter into an agreement for or with a view to acquire or dispose such securities; or
  - b. procure, directly or indirectly, an acquisition or disposal of, or the entering into an agreement for or with a view to the acquire or dispose of such securities.
- 14.2 A person is an "insider" if that person:
  - a. possesses information that is not generally available which on becoming generally available a reasonable person would expect it to have a material effect on the price or the value of securities; and
  - b. knows or ought reasonably to know the above.

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## **15. MONEY LAUNDERING AND TERRORISM FINANCING**

- 15.1 Money Laundering is the process by which one conceals funds of dubious or illegal origin and then disguises them as legitimate proceeds of lawful activities.
- 15.2 All employees must abide by the applicable laws and regulation pertaining to the Anti-Money Laundering which provides for the offence of money laundering, the measures to be taken for the prevention of money laundering and terrorism financing offences and to provide for the forfeiture of terrorist property and property involved in, or derived from, money laundering and terrorism financing offences, and for matters incidental thereto and connected therewith.

## **16. COMPUTER CRIMES**

- 16.1 All employees need to abide with the applicable laws and regulation on computer crimes Four (4) main offences relating to misuse of computers as stated below:
  - a. Hacking and unauthorized access to computer material;
  - b. Unauthorized modification of the contents of MSVN's computers;
  - c. Unauthorized communication directly or indirectly of a number, code, password or other means of access to MSVN's computers; and
  - d. Abetment and attempts to commit the offences described above.

## **17. DRESS CODE AND MEETING ETIQUETTE**

All staff are to ensure that they project a professional image of MSVN and should be dressed cleanly, tidily, neatly and appropriately at all times. Staff must observe the terms of their employment, Dress Code and Meeting Etiquette Guidelines so as to ensure seamless interactions when working either on site or remotely, especially when attending formal meetings where the employee is representing MSVN or Maybank (i.e. MSVN's Board Meeting/EXCO meeting, external meetings with customers and other external stakeholders).

## **18. MISCELLANEOUS**

Addendums and/or Appendices to this Policy are for guidance only and may be reviewed, amended and/or updated by MSVN HR Department in consultation with Maybank Group Human Capital.

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**APPENDIX 1 TO:**

**MAYBANK SECURITIES LIMITED**

**CODE OF ETHICS AND CONDUCT POLICY**

**CONFLICT OF INTEREST**

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<b>Policy Name:</b>	Maybank Securities Limited Code of Ethics and Conduct Policy
<b>Policy Effective Date:</b>	18/12/2025
<b>Policy Owner:</b>	Human Resources, MSVN
<b>Status:</b>	Active
<b>Contact Office:</b>	Human Resources, MSVN
<b>Classification:</b>	Maybank Securities Limited use only
<b>Purpose:</b>	<p>The purpose of this addendum is to enable MSVN manage conflict of interests effectively to avoid legal and reputational risks and to protect the reputation of the company and the personal integrity of the staff.</p> <p>The criteria and conditions for managing the business and personal conflict of interest positions set out in Section 1.0 of the Code of Ethics namely Outside Financial Interest, Other Business Interest, Other Employment and Corporate Directorship are stated herein.</p> <p>Please note that the criteria and conditions herein are non-exhaustive and may be reviewed and updated accordingly by HR Department with the approval of Board of Members.</p>
<b>Policy Statement:</b>	Staff must not engage directly or indirectly in any business or activity that competes or conflicts with MSVN's interest. This Code, amongst others, identifies activities that may give rise to a conflict of interest and governs restrictions and manages risks associated with such activities.

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## ADDENDUM 1A

### SECTION 1: Criteria – Outside Financial Interest in Family Business

The criteria to be taken into consideration when determining whether a staff may be granted approval to hold a **directorship or shares in Family Owned Business or Private Companies**, are as follows:

#### 1. The Business must be family owned

The business or company must be owned by the family members of the staff. The staff must provide relevant documentary evidence such as a company search and relationship documents.

#### 2. No Competition with the Business of MSVN

The nature of the family business must not compete with the nature of MSVN's business. For example, the family business should not be involved in any type of financial or securities services such as securities brokerage, lending money or any investment activities such as shares, bonds, trusts and REITs.

#### 3. No adverse harmful impact to MSVN's Reputation

The involvement in the said business would not adversely impact MSVN's reputation. Approval will not be granted, for example, if the family business is involved in activities that are not in accordance with the core values of MSVN, including but not limited to ethical environmental, social or governance values and practices.

#### 4. The involvement must not impair objectivity and/or productivity

##### (a) Directorship in a Family Owned Business or Private Companies

- Management will not grant approval for a staff to accept an executive directorship in a family owned business or company as this is deemed to impair the objectivity of the staff.
- Management may grant approval to a staff to accept a Non-Executive directorship in a family owned dormant companies, if the purpose is to facilitate the closure of the company.
- Management may grant approval to a staff to accept a Non-Executive directorship(s) if it is part of an inheritance or anticipated inheritance or for continuity of a family business. For example, if a parent is retiring as a director and the child has

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been asked to accept a Non-Executive directorship in the said company so as to enable the family to continue to have an interest in the said company.

**(b) Shareholding in a Family Owned Business or Private Companies**

- Generally, a controlling shareholding in a family owned business or private company, may be deemed as a material involvement that may impair the objectivity and/or productivity of the staff.

**(c) Other Involvement in Family Owned Business or Private Companies**

- When assessing a request, management should consider, based on the request whether any other involvement by the staff could impair the staff's productivity at work with the company (e.g. if such involvement would conflict with the interest of MSVN's working hours).



## ADDENDUM 1A

### SECTION 2: Conditions – Outside Financial Interest in Family Business Directorships

1. Staff is to give priority to MSVN at all times.
2. Staff is required to maintain confidentiality of all sensitive information relating to MSVN and be guided by the MSVN's Code of Ethics and Conduct.
3. Staff's involvement is solely on his/her personal capacity and not as a representative of MSVN.
4. Staff must uphold the good name of MSVN.
5. Staff are allowed to retain the director fees earned from the said directorship.
6. Staff are required to undertake that MSVN's resources will not be used to support their directorship or their outside involvement.
7. Any change to the Directorship or other related matters such as but not limited, to the nature of business or ownership of the said company (if any), the staff is required to disclose, update and declare the same to HR Department within seven (7) working days from effective date of the said change at the latest. Should the staff become aware of such impending change earlier, the staff is required to inform and consult HR immediately, prior to such change being affected.
8. The conditional approval is subject to, at minimum, an annual review to ensure that the interests of MSVN is preserved and the approval can be revoked at any time, without prior notice at the sole discretion of MSVN.
9. Staff is reminded that any breach of the conditions imposed by MSVN may be subjected to disciplinary proceedings, in accordance with MSVN Labor Code and the provisions of Vietnamese law.

### Shareholdings

1. Staff are allowed to retain any dividends declared and earned on shares that have been offered/purchased by the staff in their capacity as a corporate director.
2. Any change to the shareholdings (if any), the staff is required to disclose, update and declare the same to HR Department within seven (7) working days from effective date of the said change at the latest.

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## **ADDENDUM 1B**

### **SECTION 1: Criteria – Other Financial Interest or Business Activity**

In considering a request for involvement in other business, MSVN will take into consideration factors which include but not limited to:

**1. No Competition with the Business of MSVN**

The nature of the business must not compete with the nature of MSVN's business.

**2. No adverse impact to MSVN's Reputation**

The involvement in the said business would not adversely impact MSVN's reputation. For example, if the business is involved in unlicensed or illegal activities then approval will not be granted.

**3. The impact of the involvement to MSVN's Reputation**

Management may take into consideration the nature of the involvement, that is, whether involvement is in non-profit activities such as but not limited to residents' associations and/or volunteer work for government/charity/non-government organisations.

**4. The involvement must not impair objectivity and/or productivity**

- (a) Whether there is a material interest in terms of the percentage of shareholdings or an investment in terms of funding the business; or
- (b) working hours demand time and attention from the staff, to an extent that may deprive MSVN of the staff's best effort on the job; and
- (c) Whether the staff is working on a Flexible Work Arrangement.
- (d) The position/role of the staff in the other business i.e. director or shareholder, must not distract staff.



## ADDENDUM 1B

### SECTION 2: Conditions – Other Financial Interest or Business Activity

1. Staff are not allowed to promote the business among MSVN staff and customers directly or indirectly;
2. Staff are required to declare on an annual basis the status of his/her involvement in the business and update the changes of the said companies (if any);
3. Staff are to undertake to relinquish his/her business interest when he/she commences work after any period of extended leave approved (if approval is granted during his/her leave);
4. Staff must maintain confidentiality of all sensitive information relating to MSVN and strictly adhere to MSVN's Code of Ethics & Conduct.
5. Staff may be granted approval to retain the remuneration earned from the other business activity.
6. Staff is to give priority to MSVN at all times.
7. Staff will be required to take an undertaking to MSVN that he/she will not to carry out his/her business activities during office hours.

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## ADDENDUM 1C

### SECTION 1: Criteria – Other Employment

In considering a request for involvement in other employment, MSVN will take into consideration factors which include but not limited to:

**1. No Competition with the Business of MSVN**

The nature of the business must not compete with the nature of MSVN's business.

**2. No adverse impact to MSVN's Reputation**

The part-time employment should not adversely impact MSVN's reputation. Approval will not be granted, for example, if the part-time employment is involved in activities that are not in accordance with the core values of MSVN, including but not limited to unethical environmental, social or governance values and practices.

**3. The involvement must not impair objectivity and/or productivity**

Management will also take into consideration the following factors when assessing whether the involvement will impair objectivity and/or productivity:

(a) The demand of the part-time employment on the staff, the type of position or part-time role or total number of hours and days. In this regard, management will assess the nature of the part-time employment or other employment, to determine if the said employment will adversely impact the productivity of the staff.

For example, conditional approval may be granted for part-time employment such as tuition teacher, part-time Grab driver, assistant in a vegetable stall, musician or part-time master of ceremonies, selling of festive cookies, part time baking, operating a burger stall, tailor or dance/fitness instructor.

(b) The type of working arrangement that the staff currently has with MSVN (e.g. Flexible Work Arrangement).



## **ADDENDUM 1C**

### **SECTION 2: Conditions – Other Employment**

1. Staff are not allowed to promote the business among MSVN staff and customers directly or indirectly;
2. Staff are required to declare on an annual basis the status of his/her involvement in the business and update the changes of the said companies (if any);
3. Staff are to undertake to relinquish his/her business interest when he/she commences work after any period of extended leave approved (if approval is granted during his/her leave);
4. Staff must maintain confidentiality of all sensitive information relating to MSVN and strictly adhere to MSVN's Code of Ethics & Conduct.
5. The approval is for staff to do part-time business after office hours only and only at specified timing in some cases.
6. Staff may be granted approval to retain the remuneration earned from the said part-time job.
7. If application is to be a part-time insurance agent, the staff is bound by the terms and condition stated in the agency contract as well as the industry code of ethics. Staff will not be allowed to be in full time employment with MSVN;
8. Staff is to give priority to MSVN at all times; and
9. Staff will be required to take an undertaking to MSVN that he/she will not to carry out his/her business activities during office hours.

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## ADDENDUM 1D

### SECTION 1: Criteria – Corporate Directorship\*

When considering a request of this nature, management and the Board may be guided by the following criteria:

#### 1. **The involvement/Interest must not impair objectivity and/productivity**

Corporate Directorships may be given consideration unless the Board considers the interest to be material, and/or likely to impair the objectivity and/or productivity of the staff concerned. For this purpose, executive directorships are considered material.

#### 2. **No Competition with the Business of MSVN**

The nature of the business must not compete with the nature of MSVN's business. The concept of "competitor" includes financial services firms and others engaged in any industry we are involved in (even if not in direct competition with our Company), are considered rivals, including banks, fund managers, depository institutions, credit unions, brokers, dealers and underwriters. For example, the business should not be involved in any type of financial services such as lending money or any securities and investment activities such as shares, bonds, trusts and REITs.

#### 3. **Non-Family Controlled Listed Company**

The Board may grant approval to accept a Corporate Directorship that is offered to a staff in a non-family controlled Listed Company, by virtue of the staff being an industry expert or their position in MSVN; or to meet MSVN's operational needs.

#### 4. **Family Controlled Listed Companies**

The directorship is given as part of an inheritance or anticipated inheritance or for continuity of a family business.

#### 5. **Impact to MSVN's Reputation**

- Staff may be granted conditional approval to accept directorships which would build or complement MSVN's reputation, as a leading employer and/or leader in financial services.
- Approval will not be granted, for example, if the business is involved in activities that are not in accordance with the core values of MSVN, including but not limited to unethical environmental, social or governance values and practices.



## **6. Development Purposes**

Staff may be granted conditional approval to accept a Directorship(s) which is intended:

- (a) for development purposes of the staff concerned such as the women agenda and to contribute to the national agenda of building a pool of directors;
- (b) Directorship(s) which enable the staff to obtain experience as a Corporate Director for their career growth; or
- (c) Directorships which promote national or MSVN's agenda, such as diversity and inclusivity.

## **7. Eligibility**

Corporate Directorship request from senior management staff

- (i) Employees who are in benefit grade IB1 and above (or equivalent); or
- (ii) Employees who are in benefit grade IB3 and above (or equivalent), they must be 50 years old and above.

MSVN reserves the sole discretion at all times to impose fair and reasonable conditions as deemed fit to protect the interest of MSVN and the staff involved in the same. A non-exhaustive list of conditions that may be imposed by management are as set out in this Code and our internal process flow.

## **8. Governance**

All request pertaining to Corporate Directorship must be routed to HR Department for assessment before the said request is submitted to the MSVN Board of Members for consideration and approval.

Generally, the approval for an acceptance of a Corporate Directorship in other corporations is to be approved by the MSVN Board of Members. Employees who hold directorships without such approval must seek approval immediately, if they wish so to remain as directors of other corporations.

\* These refer to Directorships in public listed corporations.

It is also to be noted that if an incumbent of a position identified as Material Risk Taker or Other Material Risk Taker at MSVN makes a request to accept a corporate directorship, the said request is to be tabled for approval at the MSVN Board of Members and subsequently the Maybank Group Board of Directors be informed of said approval granted as Maybank Group Board of Directors

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govern over the Fitness and Probity of the Group's Material Risk Takers and Other Material Risk Takers.



## ADDENDUM 1D

### SECTION 2: Conditions – Corporate Directorship\*

#### a) **MSVN's Interest to be Prioritised**

As employees of the MSVN, staff are to give first priority to MSVN's interests at all the times.

#### b) **Use of MSVN's Resources Forbidden**

Staff are required to undertake that MSVN's resources will not be used to support their corporate directorship or their outside involvement, this includes but is not limited to activities related to fundraising, identification of opportunities relevant to the focus areas of the company that has offered them the corporate directorship.

#### c) **Staff's Vigilance on conflict of interest**

Staff must not put themselves in any position or act in any manner whereby actual or perceived conflict of interest may arise.

#### d) **Confidentiality of Proprietary Information**

Staff are required to undertake that staff shall not use any proprietary information, whether within their knowledge possession currently or otherwise, for the benefit of the company in which they have been appointed as a corporate director, the staff themselves and/or to the detriment of MSVN.

#### e) **No Management/operational involvement**

Staff are not allowed to be involved directly or indirectly in any manner whatsoever in the management and/or operations of company in which they have been granted approval to be a corporate director.

#### f) **No involvement in MSVN business with the company**

Staff are to abstain from being involved in advising existing and potential MSVN clients/customers on any investments relating to the company in which they have a corporate directorship. All matters relating to any financing relating to the said company will be in accordance to our policy on financing to connected parties.



**g) Adequate Training**

For staff who are granted approval to hold a corporate directorship, staff are required to attend training on directorship (for example, training programmes such as Core Module Program conducted by FIDE), which will be facilitated by MSVN, within a reasonable period of time. The cost of the training may be borne by MSVN as part of the staff's career development. This will be decided by management taking into consideration all surrounding facts of each request.

**h) Fees and Allowances**

Staff are allowed to retain the director fees and meeting allowances.

**i) Dividend on Shares**

Staff are allowed to retain the dividends earned from their shareholdings in the Company.

**j) Utilisation of Annual Leave**

Staff will be required to utilise their annual leave when attending to any matters relating to the duties and responsibilities as a corporate director.

**k) Credit Approvals Escalated to MSVN Board of Members**

If the staff is a member of the Board of the public listed Company, all credit approvals for the said company will now be escalated for approval and endorsement to MSVN Board of Members.

**l) No Public Statements on behalf of MSVN or Maybank Group**

Staff are to ensure that they will not represent themselves as a staff of MSVN or Maybank when making any media or public statements on behalf of the other company. Such statements must be made in their individual capacity as a director of the said company.

**m) Safeguard MSVN's Reputation**

Staff are required to ensure that they protect the reputation and image of MSVN at all material times, and in the event, staff are made aware of any findings relating to the company that may have a material adverse effect on the Company, or the staff, then the staff is required to immediately resign from their position as director and take the necessary steps to protect the interests of MSVN and themselves. Should the staff become aware of any findings, the staff is required to inform and consult HR Department immediately.



**n) Change in Interest/Involvement**

Any change to the Corporate Directorship or shareholdings or other related matters such as but not limited, to the nature of business or ownership of the said company (if any), the staff is required to disclose, update and declare the same to HR Department within seven (7) working days from effective date of the said change at the latest. Should the staff become aware of such impending change earlier, the staff is required to inform and consult HR Department immediately, prior to such change being affected.

**o) Confidentiality**

Staff are to maintain confidentiality of all sensitive information relating to MSVN and be guided by the MSVN's Code of Ethics and Conduct at all times.

**p) Consequence on Breach of Conditions**

Staff are reminded that any breach of the conditions imposed by MSVN herein may be subjected to disciplinary proceedings, in accordance with MSVN Labor Code and the provisions of Vietnamese law.

**q) Approval subject to Review**

The conditional approval is subject to, at minimum, an annual review to ensure that the interests of MSVN is preserved and the approval can be revoked at any time, without prior notice at the sole discretion of MSVN.

**r) Company's Board to be informed of Approval Conditions**

For good governance, staff with corporate directorships shall provide MSVN with confirmation that the Board of Directors of the Company have been informed and have taken cognizance of all the conditions set out herein.



## ADDENDUM 1E

### SECTION 1: Criteria – Industry Appointments/ Directorships of Non-Profit Public Service Corporations

When considering a request of this nature, management and the Board may be guided by the following criteria:

#### 1. The involvement/interest must not impair objectivity and/productivity

Industry Appointments/Directorships of Non-Profits may be given consideration unless Management considers the interest to be material, and/or likely to impair the objectivity and/or productivity of the staff concerned.

#### 2. Impact to MSVN's Reputation

- Staff may be granted conditional approval to accept Industry Appointments/Directorships of Non-Profits which would build or complement MSVN's reputation, as a leading employer and/or leader in financial services.
- Approval will not be granted, for example, if the business is involved in activities that are not in accordance with the core values of MSVN, including but not limited to unethical environmental, social or governance values and practices.

#### 3. Development Purposes

Staff may be granted conditional approval to accept Industry Appointments/Directorships of Non-Profits which is intended:

- as part of the staff's development to enable them to gain industry-level experience and allow them to further network with industry players for their career growth; or
- to allow our internal leaders to nurture external talent in the industry
- to contribute or promote national or MSVN's agenda, such as diversity and inclusivity.

#### 4. Governance

All request pertaining to Industry Appointments/Directorships of Non-Profits must be routed to HR Department for assessment before the said request is submitted to Management for consideration and approval. Employees who hold any industry appointments or directorships without such approval must seek approval immediately.

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## **ADDENDUM 1E**

### **SECTION 2: Conditions – Industry Appointments/ Directorships of Non-Profit Public Service Corporations**

#### **a) MSVN's Interest to be Prioritised**

As employees of MSVN, staff are to give first priority to MSVN's interests at all the times.

#### **b) Staff's Vigilance on conflict of interest**

Staff must not put themselves in any position or act in any manner whereby actual or perceived conflict of interest may arise.

#### **c) Confidentiality of Proprietary Information**

Staff are required to undertake that staff shall not use any proprietary information, whether within their knowledge possession currently or otherwise, for the benefit of the company in which they have been appointed as a corporate director, the staff themselves and/or to the detriment of MSVN.

#### **d) No Management/operational involvement**

Staff are not allowed to be involved directly or indirectly in any manner whatsoever in the management and/or operations of company in which they have been granted approval to be a corporate director.

#### **e) No involvement in MSVN business with the company**

Staff are to abstain from being involved in advising existing and potential MSVN clients/customers on any investments relating to the company in which they have a corporate directorship. All matters relating to any financing relating to the said company will be in accordance to our policy on financing to connected parties.

#### **f) Fees and Allowances**

Staff are allowed to retain any fees and meeting allowances.

#### **g) Utilisation of Annual Leave for involvement in Non-Profit Corporations**

Staff will be required to utilise their annual leave when attending to any matters relating to the duties and responsibilities in a non-profit corporation.

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**h) No Public Statements on behalf of MSVN**

Staff are to ensure that they will not represent themselves as a staff of MSVN when making any media or public statements on behalf of the other company. Such statements must be made in their individual capacity as a director of the said company.

**i) Safeguard MSVN's Reputation**

Staff are required to ensure that they protect the reputation and image of MSVN at all material times, and in the event, staff are made aware of any findings relating to the company that may have a material adverse effect on the Company or the staff, then the staff is required to immediately resign from their position as director and take the necessary steps to protect the interests of MSVN and themselves. Should the staff become aware of any findings, the staff is required to inform and consult HR Department immediately.

**j) Confidentiality**

Staff are to maintain confidentiality of all sensitive information relating to MSVN and be guided by the MSVN's Code of Ethics and Conduct at all times.

**k) Consequence on Breach of Conditions**

Staff are reminded that any breach of the conditions imposed by MSVN herein may be subjected to disciplinary proceedings, in accordance with MSVN Labor Code and the provisions of Vietnamese law.

**l) Approval subject to Review**

The conditional approval is subject to, at minimum, an annual review to ensure that the interests of MSVN is preserved and the approval can be revoked at any time, without prior notice at the sole discretion of MSVN.



**APPENDIX 2 TO:**

**MAYBANK SECURITIES LIMITED**

**CODE OF ETHICS AND CONDUCT POLICY**

**HANDLING MENTAL HEALTH-RELATED CASES**

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<b>Policy Name:</b>	Maybank Securities Limited Code of Ethics and Conduct Policy
<b>Policy Effective Date:</b>	15/07/2021
<b>Policy Last Reviewed:</b>	13/03/2025
<b>Policy Owner:</b>	Human Resources, MSVN
<b>Status:</b>	Active
<b>Contact Office:</b>	Human Resources Department, MSVN
<b>Classification:</b>	Maybank Securities Limited use only
<b>Purpose:</b>	<p>The purpose of this addendum is to enable MSVN handle Mental Health-related cases effectively to:</p> <ol style="list-style-type: none"><li>1. Uphold the good name of MSVN and maintain public confidence in the Organisation by prioritising the mental health of its employees;</li><li>2. Maintain good relationship among employees at all levels;</li><li>3. Uphold the high standards of personal integrity and professionalism of the MSVN employees; and</li><li>4. Ensure that all employees of MSVN have access to secure channels when seeking mental health support within MSVN and comply with the MSVN Code of Ethics and Conduct Policy.</li></ol>
<b>Policy Statement:</b>	<p>The Code of Ethics and Conduct Policy for Handling Mental Health-related Cases (the Code) should be applied in conjunction with the MSVN's Code of Ethics and Conduct Policy. This Code of Ethics and Conduct for Handling Mental Health-related Cases sets out the guidelines to assist support providers in discharging their duties related to mental health. Support providers in this context are employees of MSVN who provide support to other employees on mental health-related matters.</p>

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## **Coverage of the Code**

- The Code is applicable to the designated support providers<sup>1</sup> attending to Mental Health- related cases of MSVN employees either through in-person meetings and/or via telephone calls.
- Certain clauses will continue to apply to the support providers even after they have ceased employment with MSVN.

Note:

<sup>1</sup>Support providers here are referring to Group Human Capital (GHC) staff and any Maybank Group employees who have undergone relevant trainings in mental health support.

The criteria to be taken into consideration when handling Mental Health-related cases are as follows:

### **1. No Conflict of Interest**

Should the support providers receive cases in which there is a potential conflict of interest with the affected employee, the support provider is required to tactfully hand the case over to an independent party i.e. another support provider.

### **2. Misuse of Position**

- 2.1 Support providers should not abuse their position by taking advantage of information obtained in the course of duty for their personal benefit or for the benefit of other persons.
- 2.2 Support providers should not solicit any personal information from the employee.
- 2.3 It is the duty of all support providers in MSVN to ensure that there is no misuse of one's position as a support provider. Support providers who are aware of any such irregularities in the course of their work owe a duty to report such irregularities to MSVN HR Head in strict confidence.
- 2.4 In their role as support providers, they are in a position of power and trust, and as such support providers are not to condone or participate in any dishonest activities, or intentional misrepresentation of facts.

### **3. Misuse of Information**

Support providers are not to:

- Copy, remove or make use of any information obtained in the course of mental health dealings for the direct or indirect benefit of themselves or of any other persons;

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- Misuse information of the employee obtained in the course of duty to benefit themselves or confer an advantage on themselves or any other persons; and
- Exploit the employee's vulnerability.

#### **4. Integrity and Accuracy of Records**

- 4.1 Support providers should ensure that the employee's Mental Health information are correctly recorded and submitted to authorised parties only.
- 4.2 Support providers should never make or report any misleading or false information.
- 4.3 Records must be kept and maintained in such a form and for such a period as determined by MSVN records retention policy.
- 4.4 All Mental Health records or case information must be accessed and used only for the management-approved purposes for which they were originally intended.

#### **5. Commitment to Staff**

Support providers are to:

- Respond readily and promptly to mental health enquiries raised by employees;
- Provide the most appropriate assistance or advice to employees;
- Respect the essential human rights and dignity of every employee;
- Always treat the employees with respect and dignity;
- Expend discretionary efforts in handling cases and show genuine care for the employee's mental health state;
- Display professionalism at all times and ensure that all actions taken are done without favouritism or prejudice;
- Continuously put in the effort required to improve service to employees;
- Follow-up with employees to make sure that they are progressing well;
- Take accountability for all suggestions, decisions and actions taken in handling mental health-related cases with employees;



- Build rapport and trust and be fully present when attending to employees. They are the most valuable asset of the organisation; and
- Display a positive attitude, and remain calm and composed at all times, especially when encountering difficult situations while handling those seeking mental health support.

## 6. Confidentiality

- 6.1 The confidentiality of relations and dealings between the support providers and the employee is paramount in protecting the safety of the employee. Support providers are required to keep confidential information disclosed by the employee relating to their mental health including information yielded by mental health professionals. MSVN's employees have been enforced should always abide the Personal Data Protection Law.
- 6.2 Support providers have a duty to continue protecting the confidentiality of employee information. No support providers shall in any way use information so obtained for any form of gains or to cause any harm.
- 6.3 Support providers should not reveal to any parties any names or other information in connection with any mental health-related dealings with employees.
- 6.4 Support providers must also seek valid consent from the employee before sharing employee details to the relevant parties<sup>3</sup> to secure mental health professionals' intervention.
- 6.5 The identity of employees who seek mental health support from the support providers must be kept confidential and only disclosed on a strictly need-to-know basis. Employees who seek support will also be protected by MSVN from any repercussions.
- 6.6 In the event of any potential red flag<sup>2</sup> cases, support providers should act swiftly and to IMMEDIATELY update the relevant parties<sup>3</sup>.

Note:

<sup>2</sup>Red flag cases refer to a life-threatening situation in which an individual is imminently threatening to harm him or herself or others, is severely disoriented and/or out of touch with reality, has a severe inability to function, or is otherwise distraught and out of control.

<sup>3</sup>Relevant parties refer to MSVN HR Department, the Group Chief Human Capital Officer (GCHCO), Stakeholder Management, and Business Human Capital.





## **7. Required Knowledge and Compliance**

Support providers are to:

- Be up-to-date with the relevant Mental Health knowledge and skills.
- Keep abreast of the applicable laws, rules and regulations, people policies and governance when tending to mental health relations.
- To use sound judgment and common sense in complying with all applicable policies, rules and governance.

## **8. Avenue to Express Viewpoint or Complaint**

Employees may express their viewpoints or submit their complaints on the handling of mental health-related cases by support providers to MSVN HR Head in writing.