

Code of Conduct





The organization needs to create an environment that promotes a culture of “doing the right thing”, prevents unethical behavior and puts people at ease, allowing them to speak up in the workplace.

To do so, Portcoast emphasizes the importance of the role of management. Managers need to set a good example in implementing this culture in the workplace, follow up on the behaviours of colleagues and ensure that all Portcoast members feel comfortable enough to discuss issues, have the right to voice concerns in the workplace. If necessary, they should give advice, review, investigate and taking appropriate actions regarding all allegations of illegal, unsafe or inappropriate behaviour.

Mr. Pham Anh Tuan
General Director

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Introduction

Portcoast Consultant Corporation (Portcoast) was established as a joint stock company from a state-owned one under the Ministry of Transport (MOT) in 2004. Since 2006, Portcoast has become a private enterprise without the state-owned capital. Portcoast is the leading firm in the field of port and coastal engineering consultancy and digital transformation in fields of Architecture, Engineering & Construction (AEC) in Southeast Asia.

Since the establishment, Portcoast is one of the consulting firms in Vietnam who has never been involved in allegations such as: poor quality works lead to incidents, corruption, bribery, environmental pollution, etc.

Portcoast is very keen on the welfare policy for the employees, the working environment, the relationships among Portcoast members and with the Social Communities and proud of our Sustainable Business Model in Vietnam. Portcoast and the employees recognize their social responsibility and are closely guided by the values of integrity, honesty, trust, responsibility and fairness. On the social media such as newspapers, television and the social channels of the Universities, those values of Portcoast have been well reflected.





Portcoast has achieved the sustainability and many other achievements in business thanks to our Culture which is based on business ethics and the best traditions of Vietnamese people. All Portcoast members including the top managers and employees uphold and maintain the Company's Culture.

Portcoast is committed to maintaining an environment where employees feel comfortable asking questions, having comments or reporting current issues. We endeavor to respect and be flexible to cultural differences, particularly the local customs and culture of every country where we do business.

The Code of Conduct has been updated in 2022 and informed to all Portcoast members for practising and promoting the daily activities in the right and proper way. The Code of Conduct is a binding guideline, which intends to emphasize the importance of a fair, responsible, and ethical mode of operation in the interest of Portcoast, our employees and business partners.

The following rules are closely related to principles of the United Nations Global Compact (refer to the attached appendix).

01

Focusing on People and Working Environment

1.1 People

The main factor that helps Portcoast achieving our business's objectives is people. At Portcoast, we show respect to everyone. This includes all Portcoast's members, our clients, our business partners and individuals we work with. Work ethically, taking personal responsibility for the work we do and the way we do it. Appreciating other people and relationships, treat others as we would expect to be treated ourselves: openly, respect for the cultures and customs of our members, clients and others.

Professional and meaningful relationships with our members, clients and business partners are key to our success. Portcoast is committed to creating and maintaining an inclusive culture where everyone belongs, enjoy our work, reach our full potential and advance our careers.

At Portcoast, we promoting to build and maintain relationships; be courteous, respectful, actively listen and involve others. Encourage every member to work collaboratively with others and clients to find solutions, reinforce and reward positive behaviour. We must live up to our core behaviours and be open, honest, honorable and transparent in everything we do.

1.2 Work Ethically

Portcoast members must always consider how our activities and decisions impact our people and on those around us. The things we must always do and never do, in order to meet our ethical and legal obligations are:

- Obey the law, observe regulations and guidelines;
- Act with integrity;
- Always provide a high standard of service;
- Act in a way that promotes trust in the profession;
- Treat others with respect;
- Take responsibility for what we do.



1.3 Discrimination, Harassment and Violence

Portcoast is committed to provide and maintain a working environment that is free of Discrimination, Harassment and Violence to ensure all personnel are treated with respect and dignity. The preservation of our dignity, privacy and rights is a priority of Portcoast. We have zero tolerance for behavior or actions that amount to discrimination, harassment or violence.

Portcoast opposes all forms of discrimination. This is applicable to discrimination against our members and others based on gender, race, disability, ethnic or cultural background, religious conviction, age, or sexual orientation.

At Portcoast, everyone has their right to file a complaint under relevant human rights, labour and employment legislation. All allegations of Discrimination, Harassment, Violence will be promptly investigated. In matter of these allegations of Discrimination, Harassment and Violence, we favours resolving the situation or conflict as soon as possible, in a manner that is fair to and respectful of all parties involved, without having to resort to a formal complaint procedure. Coaching, counselling and facilitation can, in many instances, resolve an issue and prevent a situation from escalating which would require filing a formal complaint.

1.4 Health, Safety and Environment

At Portcoast nothing is more important than health and safety. The health and safety of our members and those affected by our work is critical, both to us and our clients. We make sure that the applicable workplace health, safety, environmental legislation is treated as a minimum standard in all areas where we conduct business.

We are committed to ensuring the well-being of and minimizing the risk of harm to our members, clients and third parties. Portcoast promotes personal safe and secure behaviours and encourages everyone to make choices that reduce risk. This is particularly important when working on sites, lone working or working in a high-risk area.

Think ahead. Think about the implications and consequences of our actions and learn from past experience. To minimal personal accident, damages to equipment and property and elimination of hazard Portcoast implement a health, safety and environment policy.

For more information, please consult the Health, Safety and Environment Policy.

02

Corruption, Appropriate Business Practices and Competition Law

2.1 Corruption, Bribery

Businesses should work against corruption in all its forms, including extortion and bribery. In interactions with business partners (e.g., customers, suppliers) and governmental institutions, corporate and any personal interests of employees will be strictly separated. Actions and decisions (e.g., purchase decisions) may be made free of external or personal considerations.

Portcoast do not tolerate corruption in any form. Corrupt behavior of associates or business partners is liable to prosecution. It distorts competition, results in financial loss, and harms the company's reputation. It leads to dependency and prevents sustainable business relationships.

Gifts are part of normal business practices, but in certain circumstances can be considered as a form of Bribery. Management and employees of Portcoast are not permitted to offer, promise, demand, permit or accept gifts, payments, invitations or other services, which have the intention of influencing the business relationship in an illegitimate manner or which run the risk of endangering the professional independence of one of the business partners. This does not include small gifts or invitations offered as part of the usual hospitality, customs or courtesy of business interaction.

2.2 Money Laundering and Tax Evasion

Portcoast ensures that, prior transacting with any members, clients, business partners or others, all reasonable and practical measure have been taken to confirm the identities to prevent any facilitation of money laundering, tax evasion operations.

We have zero tolerance for any criminal facilitation, including money laundering, tax evasion and will not engage in facilitate, or be associated with any form of stated criminals' behaviors.

2.3 Suppliers and Business Partners (Third Party)

Portcoast is committed to dealing transparently with Third parties. Delivering work describes the way we fulfil our commitments and satisfy the needs of interested parties, as well as meeting our own and industry standards. The agreements we make with the suppliers, business partners are complete, unambiguous and documented, including any subsequent changes and additions.

2.4 Conduct with Competitors (Competition Law)

Portcoast respects fair competition and as such encourages compliance with the applicable laws that protect and advocate competition. Competitors are not allowed to exchange confidential information or reach agreements on clients, prices, components of prices, supply relationships and terms and conditions of bids. The same applies to exchange of information concerning market strategies. We are aware that it is prohibited not only to make written agreements in this respect, but also on verbal agreements.

Every Portcoast member ensure that their business practices and competitive actions do not give the appearance of an attempt to engage in unfair competition or in an abuse of a dominant position in the marketplace. Do not apply any tactics for the purpose of excluding competitors from the marketplace.



03

Corporate
Social Responsibility

3.1 Human Rights

Portcoast adheres to, supports and respect all internationally recognized human rights. We seek to earn the trust of everyone impacted by our operation, demonstrating our commitment to ethics and human rights through our words and actions. We will always act ethically and respect human rights, everyone should be treated with dignity, fairness and respect.

An essential part of our human rights effort relates to labor rights and working conditions. The rights our every Portcoast's member, clients, business partners shall always be respected, and we will work to ensure high labor standards. Upholding human rights is the responsibility of every Portcoast's member.

3.2 Child Labor and Forced Labor

Portcoast observes the United Nations regulations of children's rights. We do not tolerate child labor, forced labor, involuntary or trafficked labor in any form. Additionally, we have zero tolerance for any abuses, exploitation, or sexual activity with any person against their will or for payment (prostitution), when travelling on business or in any other way representing the company.

3.3 Working Hours and
Compensation

At Portcoast, a balance between work and private life is highly promoted. It is our aim to have a responsible approach in regard to compensation. As a minimum, every member must be compensated in line with or above the legal minimum.

Everyone shall not be required to work harmful amounts of overtime. Except in extraordinary business circumstances, every member is entitled to at least one day off in every seven-day period (every week). The information about the working terms and conditions including compensation and working hours is clearly announced.



04

Protecting our Assets

Protecting our information and assets is vitally important to both us and our business partners. From a business perspective it is essential that information such as financial results, business plans, technical designs, or personal information is not compromised. It is essential that information is used and distributed appropriately and responsibly.

4.1 Electronic Resources

Portcoast provides the electronic resources we need to conduct our business, including email, information systems, information technology equipment, software, internet and network access. These resources remain the exclusive property of Portcoast. Some advanced equipment & technologies are now being used in Portcoast Consultant Corporation and the first ones in Vietnam, Southeast Asia and Asia to be applied to the survey, design and consultancy for coastal works in Vietnam and many other countries.

We must always use them responsibly, appropriately and ethically. Use our work email address to send or receive work related electronic communications, protect the integrity of Portcoast's advance equipment and technologies.



4.2 Confidential Information

Information of Portcoast is one of our most valuable assets. This could include financial information, trade secrets, prices, sales and profits, strategies and plans, contractual information, customer and supplier lists, information about new projects or any other non-public information about Portcoast.

Confidential information must be protected, handled carefully and not shared with unauthorized third parties or publicly unless you have been specifically authorized to do so. The obligation to protect confidential information continues after termination of employment. This is also valid for information shared with us by customers, suppliers and other business partners.

4.3 Social Media

At Portcoast, various activities and news are updated on our website and social media such as Facebook, Youtube, etc. We are encouraged to be our company's ambassadors on social media, but beside that every member of Portcoast must be cautious when posting and responding on social media. Remember that we represent Portcoast when we identify ourselves as company's members on social media. This means that our post could affect Portcoast's reputation and business interest.

Protect personal data and confidential information to which we have access and keep in mind that the views we express are our own and not those of our company.

05 Sustainability Principles

As Vietnam's Leading Port & Coastal Consultant, Portcoast believes that the future depends on what we do today. Each of us has a responsibility to consider the sustainability of our own practices and their effect on society and the environment, in line with the Sustainability Principles.

5.1 A Society for our Future

Promote science, technology and engineering to young generation to encourage them become to planners, designers, project managers and engineers of the future.

Support our people on a development pathway to deliver innovate and sustainable solutions to sustain knowledge and skills.

Encourage and support our people to realize their capability to contribute to the social, environmental and economic health of our communities.

Value and respect every member, providing both advantage and equality of opportunity in recruitment, development, recognition and reward.

"The future depends on what we do today..."

Mr. Nguyen Viet Dung
Standing Vice General Director
& Chief Human Resources Officer



5.2 Respect for the Environment

Each of Portcoast members contributes significantly to improving and maintaining our environmental performance. At Portcoast, we always manage, document the environmental impacts diligently and in line with legal requirements and ensure that the appropriate environmental permissions exist.

Global raw material consumption and waste production are rising at an alarming rate as a result of population growth, rapid urbanization, and economic development. One of the most affordable and efficient strategies to lessen environmental effects is to use natural resources more effectively. We effectively manage natural resources and assist our clients in strengthening their resource resilience.

Nature makes human development possible, but climate change and our demand for the Earth's resources are accelerating extinction rates and devastating the world's ecosystems. Since biodiversity makes up the living portion of the stock of natural capital. We protect and improve the ecosystem, recognizing the valuable services they provide in order to show our respect to the environment.



5.3 A Low Carbon Economy

Portcoast always chooses advanced technologies and investment in modern equipment to ensure minimal impact on the environment in all aspects.

Use resources wisely such as energy, water, food, paper, and minimize traveling by using web meeting facilities or telecommunication. Ensure that the appropriate environmental permissions exist. Do not take shortcuts because local law allows an action that we as a Group consider unethical or environmentally harmful.

Propose innovative, sustainable and low carbon solutions to every client, business partner for the potential impacts of climate change. Continue our work to become a low carbon organization and help governments, businesses, society to make the transition to a low carbon economy.

5.4 A Responsible Business of the Future

Plan, design and enable to provide sustainable value and technical excellence for our clients. Support governments, investors and other authorities to achieve economic and environmental resilience through infrastructure and technological investment.

Demonstrate responsibility, transparency and fairness in the way we manage our business. Recognize the importance of sustaining local economies by employing local expertise and selecting and developing local suppliers.

Collaborate with key organizations to develop innovative solutions that meet the complex sustainability challenges faced by society.



06

Contacts for Reporting an Issue or Raising a Concern

If there is something that you feel is not right, is unethical, illegal, unsafe or not secure and breach any rules under this Code of Conduct, you should report an issue or concern to your line manager or supervisor or directly to another senior manager or directly to one of the following top managers:

Mr. Pham Anh Tuan - General Director – email: tuan.pa@portcoast.com.vn

Mr. Nguyen Viet Dung - Standing Vice General Director - email: dung.nv@portcoast.com.vn

Telephone: 84964314276



Appendix

The United Nations Global Compact

The United Nations Global Compact is the world's largest corporate sustainability initiative. It is a call to companies to align strategies and operations with universal principles on human rights, labor, environment and anti-corruption, and take actions that advance societal goals.

The United Nations Global Compact aims to mobilize a global movement of sustainable companies and stakeholders to create the world we want.

Human Rights

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: make sure that they are not complicit in human rights abuses.

Labor Norms

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labor;

Principle 5: the effective abolition of child labor; and

Principle 6: the elimination of discrimination in respect of employment and occupation.

Environmental Protection

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally friendly technologies.

Fighting Corruption

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

PORTCOAST

The logo consists of the word "PORTCOAST" in a bold, white, sans-serif font. Below the text are two parallel white wavy lines that follow the general shape of the letters, creating a stylized underline.