# **INFORMATION DISCLOSURE REGULATIONS**

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# ADJUSTED/SUPPLEMENTED TRACKING TABLE

No.	Content	Adjustments/additions	Reasons for adjustment/addition
1	Appendix 1: List of information disclosed under the securities law (updated in blue letters)	- Review new regulations including the Listing Regulation 2025 of the Vietnam Stock Exchange, the regulation on the Exercise of Rights and the Regulation on Registration and Transfer of Ownership 2025 of VSDC, Decree 245/2025 - Addition of forms and references to legal documents	Updates and clarifications

# INFORMATION DISCLOSURE REGULATIONS OF VIETNAM DAIRY JOINT STOCK COMPANY

#### I. PURPOSE

- Systematize the contents related to information disclosure specified in legal documents so that the Company's information disclosure is complete, accurate, timely and transparent.
- 2. Regulations on the process and responsibilities of divisions, functional departments and units within the Company regarding information disclosure, to ensure compliance with the law and that disclosures are strictly controlled in accordance with the Company's regulations.

#### II. SUBJECTS AND SCOPE AND APPLICATION

- 1. **Scope:** This Regulation applies to all divisions, departments, organizations and individuals involved in the disclosure of information in accordance with provisions of law.
- 2. **Subjects:** This Regulation applies to all disclosed information, namely:
  - Disclosure of information in accordance with the provisions of the Securities Law and regulations related to the operation of listed companies, disclosure of information to shareholders and investors. Hereinafter referred to as "Information disclosure under the Securities Law";
  - Disclosure of information for mass media such as newspapers, radio, television, magazines, news agencies and other entities not subject to information disclosure under the above-mentioned Securities Law. Hereinafter referred to as "Information disclosure to the mass media".

#### III. RESPONSIBILITY

- The Investor Relations (IR) Department is responsible for sending the approved disclosure to the securities market (SSC, HOSE, VSDC, shareholders and investors);
- The Public Relations (PR) Department is responsible for contacting and working with mass media units;
- The Corporate Communication (CC) Department is responsible for presenting content, image layout and posting information on the Company's website in accordance with the Regulations on Management and posting information on the Company's website QD-MKT-01;
- The departments/divisions/units mentioned in Section V. CONTENTS are responsible for coordinating and implementing in compliance with this Regulation.

#### IV. DEFINITIONS AND TERMINOLOGY

Company/Vinamilk	Vietnam Dairy Joint Stock Company
BOD	Board of Directors
AGM	General Meeting of Shareholders
SSC	State Securities Commission
HOSE	Ho Chi Minh City Stock Exchange
VSDC	Vietnam Securities Depository and Clearing Corporation
Internal person	Chairman of the Board of Directors, members of the Board of Directors, Chief Executive Officer, Chief Accountant;

	company secretary, person in charge of corporate governance, person authorized to disclose information.
The person in charge of information disclosure	The person responsible for representing the Company in external information disclosure is the legal representative or a legally authorized individual designated to disclose information on behalf of the Company

#### V. CONTENT

#### V.1. THE PERSON IN CHARGE OF INFORMATION DISCLOSURE

- 1. The Company must fulfil the information disclosure obligation through the Legal Representative or one (01) individual who is the Company's authorized person for information disclosure.
- 2. In case the Company fulfils the information disclosure obligation through the authorized person for information disclosure, the appointment of an authorized person for information disclosure shall be carried out as follows:
  - The CEO has a written decision authorizing 01 person in the Executive Board to carry out information disclosure during the time the CEO is absent from the Company;
  - The Legal Department shall make a power of attorney according to Appendix 01 and the authorized person shall provide information according to Appendix III of Circular 96/2020/TT-BTC to register and re-register the authorized person for information disclosure with the SSC and HOSE within 24 hours from the effective date of the authorization:
  - In case an information disclosure event arises in which both the legal representative and the authorized person for information disclosure are absent, the remaining members of the Executive Board shall agree to appoint 1 member to fulfil the information disclosure.
- 3. Investors subject to information disclosure are individuals who can fulfil information disclosure obligations by themselves or authorize 01 organization (the Company, VSDC or other organizations) or 01 other individual to fulfil information disclosure obligations as follows:
  - In case of self-fulfillment of information disclosure obligations, in the first information disclosure, individual investors must submit to the SSC and HOSE the information supply according to the form specified in Appendix III issued together with Circular 96/2020/TT-BTC and are responsible for providing accurate, timely and complete information when there are changes to the contents of the submitted form.:
  - Individual investors shall report and re-report information about the authorized person for information disclosure to the SSC and HOSE within 24 hours from the effective date of the authorization. Contents of information reported on the person authorized to disclose information include: Power of attorney for information disclosure according to the form specified in Appendix II and Information provision form according to the form in Appendix III issued together with Circular 96/2020/TT-BTC.

#### V.2. COMPANY INFORMATION DISCLOSURE

#### V.2.1. PRINCIPLES OF INFORMATION DISCLOSURE

- 1. The content of information disclosed must be clear, complete, accurate, timely and comply with the provisions of law.
- The person in charge of information disclosure will be responsible for the information they disclose. In case there is a change in the content of the disclosed information, the person in charge of information disclosure must promptly and fully announce the changed content and the reason for the change compared to the previously disclosed information.

- 3. The main language of information disclosure is Vietnamese. The company announces the disclosure in English at the same time as Vietnamese. In case the disclosure of information under the Securities Law follows the form prescribed by the SSC, HOSE and VSDC, it shall be applied according to that form.
- 4. When the content of information disclosure has been signed and approved by the person in charge of information disclosure, the Company's sending of the content is regulated as follows:
  - IR: send information disclosure to securities market management agencies such as the SSC, HOSE, VSDC, shareholders and investors, and send to CC to post information on the website:
  - PR: send information disclosure (if any) to the mass media. All departments/divisions and affiliated units are not allowed to send information to the mass media without the review of the Director of the PR Department, and/or the person in charge of information disclosure.

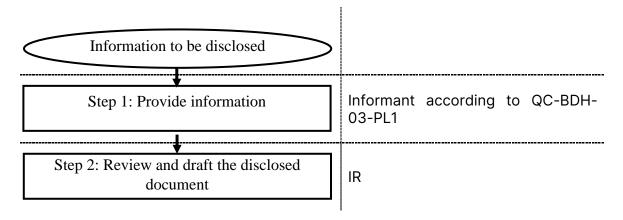
#### V.2.2. FORMS AND MEANS OF DISCLOSURE

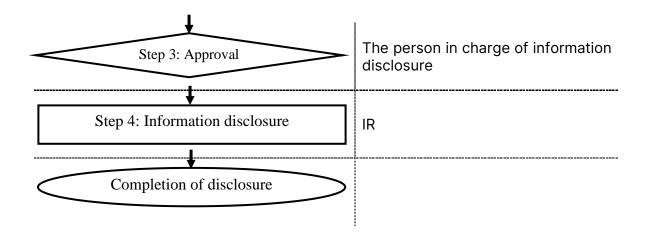
- 1. Disclosed information is expressed in the form of documents, publications, articles in print and online newspapers, reportage, interviews, electronic data using digital signatures, etc. The information in electronic data must use the Unicode code.
- 2. Means of information disclosure include:
  - The Company's website;
  - Disclosure means of the SSC, HOSE, VSDC;
  - Other mass media as prescribed by provisions of law (print newspapers, online newspapers, etc.).
- 3. The website used for disclosure, fax number/email address used to transfer information must be notified and registered with the SSC and HOSE.
- 4. In case there is a change related to the address of the website or changes on the website that leads to the interruption of information disclosed to the Investor, the Corporate Communication Department needs to inform the Investor Relations Department to send a written notice to the SSC and HOSE within three (03) working days from the date of change.

#### V.2.3. REGULATIONS ON INFORMATION DISCLOSURE

#### V.2.3.1. Information disclosure under the Securities Law:

#### V.2.3.1.1. Information disclosure flowchart:





#### V.2.3.1.2. Order of information disclosure:

#### **Step 1. Providing information**

- The list of information disclosed under the Securities Law, the person in charge of providing information and the time limit for providing information are presented in *Appendix 1: List of information disclosed under the Securities Law*;
- In case of disclosure not specified in *Appendix 1*, relevant departments and divisions according to their functions and tasks shall provide information to the Investor Relations Department to carry out information disclosure in accordance with the provisions of current law;
- Periodically or when information to be disclosed arises, the person in charge of providing information is responsible for transferring the information to the IR Department. Information is presented in the form of text, accompanied by electronic data files (Word, Excel, PDF, etc.);
- The person in charge of providing information shall transfer information to the IR Department as quickly as possible from the time the information to be disclosed arises but no later than 15:00 on the last day of information disclosure. The content provided to the IR Department must include Vietnamese and English.

## Step 2. Review and draft the announcement document

- The IR Board checks the completeness and compares with the provisions of the law for the information to be disclosed. Then draft a disclosure document according to the form in the regulations and guidelines of the Securities Law, the SSC, HOSE, and VSDC.

#### Step 3. Approve

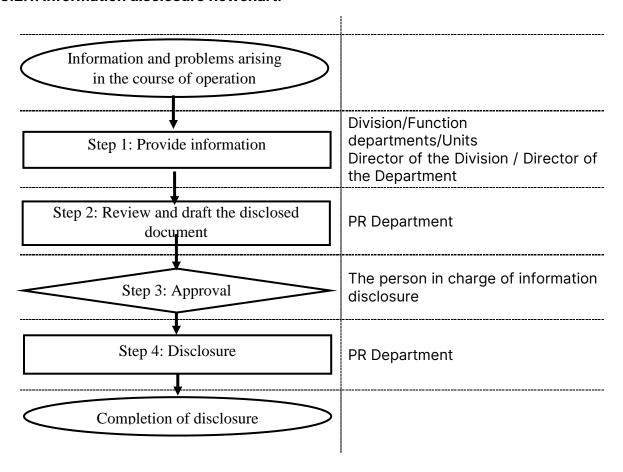
- The IR Department submits it to the person of information disclosure for review and approval.
- Particularly for quarterly, semi-annual and annual financial statements (separate and consolidated), the Financial Accounting Department shall submit them to the Audit Committee of the Board of Directors for consideration before submitting them to the CEO for signature and transfer them to the Investor Relations Department for information disclosure.

# **Step 4. Information Disclosure**

- The IR Department shall send the disclosure to the management agencies as prescribed, and at the same time send it to the Corporate Communications Department for posting on the Company's official website and to the PR Department for posting on other mass media (if any).

# V.2.3.2. Information disclosure to the mass media:

#### V.2.3.2.1. Information disclosure flowchart:



#### V.2.3.2.2. Order of information disclosure:

#### Step 1. Providing information

- When information or events arise that are considered that: (1) may create a positive impact on the company's image, brand, reputation, and communication (e.g. Awards, Achievements, New Improvements,...) or (2) may create negative impacts on the Company (Incidents, Complaints, Violations, Notices from the authorities, etc.); or (3) the Company should/should proactively disclose information: The Director of the functional department/unit must immediately report to the Director in charge of expertise (if any);
- The Director of the division (if any) or the Director of the functional department/unit shall consider the nature and importance of the information, if it is deemed necessary to make the announcement, transfer the information to the PR Department and report to the CEO.

#### Step 2. Review and draft the disclosed document

- When the CEO deems it necessary to carry out information disclosure or according to the proposal of information disclosure from the PR Department, the Director of the division (if any) or the Director of the Functional Department/must provide complete and truthful information and details of any arising issues to the PR Department for drafting the disclosure content. - Information before being approved for official publication must be reviewed by the relevant departments for accuracy and completeness.

#### Step 3. Approval

- The form of disclosure, the content of the press release, the interview content and the person directly answering the interview (if any) must be approved by the Executive Director of Human Resources, Administration, and Internal Affairs. The Directors will consider submitting to the CEO on a case-by-case basis.

#### Step 4. Information disclosure

- The information disclosure shall be carried out in one of the following forms but not limited to:
  - Transfer information in writing to the mass media;
  - Conduct interviews for news or articles;
  - o Conduct interviews and reports in the form of video and audio recordings.
- The PR Department is responsible for carrying out the relevant procedures for the implementation of the announcement and notifying the relevant departments of the time when the mass media officially report the news, and at the same time notify the content of the disclosed information to the IR;
- In case the mass media reports that there is a deviation from the Company's information, the PR Department is responsible for coordinating with the information generation department and/or the person directly answering the interview to solve and adjust the information content in a timely manner. If the discrepancy is considered serious and potentially harmful to the Company, the PR Department must report to the Executive Director of Human Resources, Administration, and Internal Affairs or the person in charge of information disclosure for guidance.

## V.2.3.3. Postponement of information disclosure:

Subjects of information disclosure are entitled to postpone information disclosure in case of force majeure reasons (natural disasters, fires, etc.). The subject of information disclosure must report the suspension to the SSC and HOSE immediately after the event occurs, clearly stating the reasons for the suspension. At the same time, a public announcement regarding the suspension must be made.

Immediately after the force majeure situation has been overcome, the subject of disclosure is responsible for fully disclosing information that has not been previously disclosed in accordance with the law.

# V.3. INFORMATION DISCLOSURE OF INVESTORS SUBJECT TO INFORMATION DISCLOSURE

Investors subject to information disclosure include:

- Internal persons of public companies as prescribed in Clause 45, Article 4 of the Law on Securities and related persons of internal persons;
- Major shareholders and groups of related persons own 5% or more of the voting shares of the public company;

- The group of related foreign investors owns 5% or more of the voting shares of 01 issuer;
- Shareholders and groups of related persons buy to own 5% or more of the voting shares of the public company;
- Organizations and individuals making public tender offers for shares of public companies.

The list of information disclosed under the Securities Law, the person in charge of providing information and the time limit for providing information are presented in *Appendix 1: List of information disclosed under the securities law* attached to this Regulation.

#### VI. ORGANIZATION OF IMPLEMENTATION AND IMPLEMENTATION EFFECT

#### VI.1. STORAGE AND PRESERVATION OF DISCLOSED INFORMATION

The disclosed information must be stored at the Company's head office in the form of documents, electronic files, data, video tapes, audio tapes, articles, etc.

## Storage Parts:

- Investor Relations Department: responsible for archiving information disclosure in accordance with the Securities Law;
- PR Department: responsible for archiving disclosures for the mass media.
- The preservation and storage of disclosed information must comply with the provisions of the law or the Company's current regulations on information storage.

The storage period of published information shall comply with the following regulations:

- Information published periodically must be stored in writing (if any) and electronic data for at least 10 years, and kept on the website for at least 05 years;
- Information disclosed irregularly or on demand must be kept on the website for at least 05 years.

#### **VI.2. IMPLEMENTATION PROVISIONS**

All individuals may not disclose any Information and in any form on behalf of the Company without the authorization of the CEO, except in cases where self-disclosure is required by law.

Depending on the nature and severity of this policy violation, it will be considered for disciplinary action, sanctioned according to the Company's internal rules and may be handled according to other provisions of law If the violation results in damage to the Company, the individual responsible must compensate for the loss in accordance with the law.

This information disclosure regulation is disseminated to (i) the person in charge of information disclosure, (ii) the information provider, and (iii) all employees of departments/units throughout the Company.

# VIETNAM DAIRY JOINT STOCK COMPANY REGULATION INFORMATION DISCLOSURE



# APPENDIX 1: LIST OF INFORMATION DISCLOSED BY THE COMPANY UNDER THE SECURITIES LAW

## A. PERIODIC INFORMATION DISCLOSURE

No.	Information disclosure content	Person in charge of providing information	Deadline for information disclosure	Reference	Disclosure Means
1	Financial Statements				
1.1	<ul> <li>Separated and semi-annual consolidated financial statements (06 months) have been reviewed by independent auditors.</li> <li>And explain when:         <ul> <li>Profit after tax changed by 10% or more compared to the same period last year.</li> <li>Profit after tax in the reporting period is a loss, or a profit in the previous period but a loss in this period or vice versa.</li> <li>Profit after tax has a difference of 5% or more before and after audit or review.</li> </ul> </li> <li>Written explanation in case the audit opinion does not accept the entire financial statement.</li> </ul>	Financial Accounting Department	Within 05 days after the auditor signs the report but must not exceed 60 days after the end of the first 06 months of the fiscal year	Point c, Clause 2, Article 14, Circular 96/2020; Clause 4, Article 14, Circular 96/2020	HOSE's communication portal (ECM), the Company's website, and send a paper copy to
1.2	- Separate and quarterly consolidated	Financial	Within 30 days after	Point c, Clause	HOSE
	financial statements have been reviewed by independent auditors.  - And the explanation is similar to the one mentioned in 1.1.	Accounting Department	the end of the quarter or 05 days after the auditor signs the report but must not exceed 45 days after the end of the quarter	3, Article 14, Circular 96/2020	
1.3	<ul> <li>Separated and consolidated financial statements for the year</li> </ul>	Financial Accounting Department	Within 10 days after the auditor signs the report but not later	Clause 1, Article 10, Circular 96/2020	





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No.	Information disclosure content	Person in charge of providing information	Deadline for information disclosure	Reference	Disclosure Means
	<ul> <li>And the explanation is similar to the one mentioned in 1.1.</li> </ul>		than 90 days after the end of the fiscal year		
2	Annual Report Form: Appendix 04, TT96/2020	Drafting committee under the decision of the CEO	Within 20 days after the disclosure of the financial statements but not later than 110 days after the end of the fiscal year.	Clause 2, Article 10, Circular 96/2020	HOSE Communication Portal (ECM), Company website
3	Annual General Meeting of Shareholders				
	- The record date to attend the AGM.	Finance Department	20 days before the date of the final registration date for attending the AGM	Point b, Clause 4, Article 11, Circular 96/2020	HOSE's communication portal (ECM), the Company's website, and send a paper copy to HOSE
	<ul> <li>Announcement of the record date attend the AGM.</li> <li>Form: Form 01/THQ, THQ/2025</li> <li>Regulation</li> <li>Note: The shareholder list to attend the AGM shall be made no more than 10 days before sending the invitation according to Clause 1, Article 141, Enterprises Law 2020 and the company's Charter</li> </ul>	Finance Department	At least 08 working days before the final registration date	Clause 1, Article 7, Regulation on the Exercise of Rights/2025	VSDC's Communication Portal
	- Summary of the shareholder list to attend the AGM. Form: Disclosure Form/SGDHCM-09, Disclosure Regulation/2016	Finance Department	Within 15 days from the record date	Point a, Clause 7.3, Article 8, Regulation on Information Disclosure/2016	HOSE Communication Port (ECM)





No.	Information disclosure content	Person in charge of providing information	Deadline for information disclosure	Reference	Disclosure Means	
	<ul> <li>All meeting documents such as: meeting invitation, agenda, voting ballot, list and information of candidates if there is an election of the Board of Directors, the Supervisory Board, draft resolutions for each matter in the agenda.</li> </ul>	Company Secretary	21 days prior to the date of the AGM	Point a, Clause 3, Article 10, Circular 96/2020	HOSE Communication Portal (ECM), Company website	
	- Minutes and Resolutions of the AGM after the meeting.	Company Secretary	Within 24 hours	Point c, Clause 1, Article 11, Circular 96/2020	HOSE Communication Portal (ECM), Company website	
4	Corporate Governance Report for 06 months and full-year Form: Appendix V, Regulation on Disclosure of the Vietnam Stock Exchange/2021	Company Secretary	<ul><li>6-month report:</li><li>July 30</li><li>Full-year report:</li><li>January 30</li></ul>	Clause 4, Article 11, Circular 96/2020	HOSE Communication Portal (ECM), Company website	
5	Corporate governance declaration for 06 months and full-year year Form: Form NY-02, Listing regulations/2025	Company Secretariat	<ul><li>6-month report:</li><li>July 30</li><li>Full-year report:</li><li>January 30</li></ul>	Point a, Clause 1, Article 49, Listing regulation/2025	HOSE Communication Portal (ECM), Company website	
6	List of shareholders of the state, strategic shareholders, major shareholders and treasury shares of the company Form: Information disclosure form/SGDHCM-04, Regulation on information disclosure /2016	Finance Department	<ul> <li>Q1 report: March 10 based on the Shareholder list as of Febuary 28</li> <li>Q2 report: June 10 based on Shareholder list as as of May 31</li> <li>Q3 report: September 10 based on Shareholder list as as of August 31</li> <li>Q4 report:</li> </ul>	Point b, Clause 1, Article 49, Listing regulation/2025	HOSE Communication Portal (ECM), Company website	





No.	Information disclosure content	Person in charge of providing information	Deadline for information disclosure	Reference	Disclosure Means
			December 10 based on the Shareholder list as of November 11		

#### B. DISCLOSURE OF EXTRAORDINARY INFORMATION WITHIN 24 HOURS

- Disclosure means: HOSE's communication portal (ECM) and the Company's website.
- Form: Appendix VI, Regulation on Disclosure of the Vietnam Stock Exchange/2021 except for cases with separate notes; must clearly state the occurrence of the event, the causes and remedial solutions (if any).

No.	Information disclosure content	Person in charge of providing information	Deadline for information disclosure	Reference
1.	The company's account at a bank or foreign bank's branch is blocked at the request of a competent authority or when the payment service provider detects signs of fraud or violation of law related to the payment account; the account is allowed to resume operation after being blocked in the cases specified at this Point;	Financial Accounting Department		Clause 1, Article 11, Circular 96/2020; Clause 2, Article 10,
2.	Upon receipt of a document from a competent state agency or when the company has a decision on the suspension of part or all of its business activities; changes in enterprise registration contents; revocation of enterprise registration certificates; amendment, supplementation or suspension or revocation of the Establishment and Operation License or Operation License;	- Company Secretary - Legal Department	Within 24 hours from the time of the event	Chapter 2, Regulation on Information disclosure of the Vietnam Stock Exchange/2021
	Form: Appendix III, Regulation on Information disclosure of the Vietnam Stock Exchange/2021			





No.	Information disclosure content	Person in charge of providing information	Deadline for information disclosure	Reference	
3.	Approved the decision of the Extraordinary AGM. Documents to be disclosed include: Resolution of the General Meeting of Shareholders, minutes of the meeting and documents enclosed with the minutes, resolutions or minutes of vote counting (in case of collecting shareholders' opinions in writing);	Company Secretary			
4.	Decision to buy back the company's shares or sell treasury shares; the date of exercise of the right to purchase shares of the bondholder together with the right to purchase shares or the date of conversion of bonds into shares; decisions on offshore securities offering and decisions related to the offering and issuance of securities;	Company Secretary			
5.	Decisions on the dividend level, form of dividend payment, dividend payment time; deciding on the separation and consolidation of shares;	Company Secretary			
6.	Decisions on enterprise reorganization (division, separation, consolidation, merger, transformation of enterprise types), dissolution or bankruptcy of enterprises; change of tax identification number, change of company name and seal of the company; change of location; new establishment or closure of head offices, branches, factories or representative offices; promulgate, amend and supplement the Charter; the company's medium-term development strategy and plan and annual business plan; Form: Appendix IV, Regulation on Information disclosure of the Vietnam Stock Exchange/2021	Company Secretary Legal Department	Within 24 hours from the time of the event	Clause 1, Article 11, Circular 96/2020; Clause 2, Article 10, Chapter 2, Regulation on information disclosure of the Vietnam Stock Exchange/2021	
7.	Decision on change of accounting period and applicable accounting policy (except for changes in	Financial Accounting Department			





No.	Information disclosure content	Person in charge of providing information	Deadline for information disclosure	Reference
	applicable accounting policies due to changes in legal regulations); notify the auditing firm that has signed the contract to audit the annual financial statements or change the auditing firm (after signing the contract); the cancellation of signed audit contracts;			
8.	The decision to contribute capital to the establishment or purchase to increase ownership in a company leads to that company becoming a subsidiary or associate company or sell it to reduce the ownership rate in a subsidiary or associate company leading to that company no longer being a subsidiary, associate companies or dissolve subsidiaries or associate companies;	Company Secretary		
	Form: Appendix IV, Regulation on Information disclosure of the Vietnam Stock Exchange/2021			
9.	Decisions of the General Meeting of Shareholders or the Board of Directors approving contracts and transactions between the company and internal persons, related persons of internal persons or related persons of the company;	Company Secretary		
10.	When there is a change in the number of voting shares; Form: Appendix V, Regulation on Information Disclosure of the Vietnam Stock Exchange/2021	Finance Department	Specifically, each case is as follows:	Clause 1, Article 11, Circular 96/2020; Clause 2, Article 10, Chapter 2
	- In case the company issues additional shares or converts bonds or preferred shares into shares.	Finance Department	Within 24 hours from the time the company reports to the SSC on the issuance results, conversion results in	Chapter 2, Regulation on Disclosure of the Vietnam Stock Exchange/2021





No.	Information disclosure content	Person in charge of providing information	Deadline for information disclosure	Reference
			accordance with the law on securities issuance	
	- In case the company buys back its own shares or sells treasury shares.	Finance Department	Within 24 hours from the time the company reports the transaction results in accordance with the law on repurchase of its own shares, sale of treasury shares	
	- In case the company buys back shares of employees according to the regulations on issuance of shares to employees of the company or repurchase odd-lot shares at the request of shareholders.	Finance Department	Within the first 10 days of the month on the basis of completed transactions and updated to the date of disclosure	





STT	Disclosure content	Person in charge of providing information	Deadline for information disclosure	Reference
11.	The company receives a resignation letter from an internal person;	Company Secretary	Within 24 hours from the time of the event	
	<ul> <li>Information disclosure of resignation applications of internal people;</li> </ul>	Human Resources Department		
		Company Secretary		
	<ul> <li>Information disclosure of resolutions/decisions on change, new appointment, re-appointment, dismissal of internal persons (the company needs to clearly state the effective time as prescribed in the Enterprises Law and the company's Charter); Form: Appendix I, Regulation on Information disclosure of the Vietnam Stock Exchange/2021</li> </ul>	Company Secretary		Clause 1, Article 11, Circular 96/2020; Clause 2, Article 10, Chapter 2, Regulation on Information disclosure of the Vietnam Stock Exchange/2021
	<ul><li>Send to the SSC, HOSE the information sheet of the new internal person;</li><li>Form: Appendix III, Circular 96/2020</li></ul>	Company Secretary		
	- There is a change in the information provided by internal persons and related persons; Form: Appendix II, Regulation on Information disclosure of the Vietnam Stock Exchange/2021	Company Secretary		
12.	The decision to buy or sell assets or carry out transactions with a value greater than 10% of the company's total assets is based on the latest audited consolidated financial statements or the reviewed financial statements of the last 06 months;	Company Secretary		
13.	Upon receipt of the decision to institute a lawsuit against the company, the company's internal person; temporary detention and examination for penal liability for internal person of the company;	Legal Department		





STT	Disclosure content	Person in charge of providing information	Deadline for information disclosure	Reference
14.	Upon receipt of the legally effective judgment or decision of the Court related to the company's operation; Decisions on sanctioning tax-law violations;	<ul> <li>Legal Department</li> <li>Financial         Accounting         Department</li> <li>Tax Administration         Department</li> </ul>		
15.	The company receives a notice from the Court accepting the application for initiation of enterprise bankruptcy procedures;	Legal Department		
16.	In case the company is aware of an event or information that affects the company's own securities price, the company must confirm or correct such event or information;	- Company Secretary - Investor Relations Department		Clause 1, Article 11, Circular 96/2020; Clause 2, Article 10, Chapter 2, Regulation on Information disclosure of the Vietnam Stock Exchange/2021
17.	When other events occur that have a great impact on production and business activities or the company's governance;	Functional Blocks/Rooms		
18.	To be approved or delisted on foreign HOSE.	Company Secretary		
19.	Decision on increase or decrease of charter capital;	Company Secretary	Within 24 hours from	
20.	Decision on capital contribution to investment in an organization, project, borrowing, lending or other transactions with a value of 10% or more of the company's total assets in the latest audited annual financial statements or the latest reviewed semi-annual financial statements (based on the consolidated financial statements);	Company Secretary	the time of the event	Clause 2, Article 15, Circular 96/2020
21.	A decision on capital contribution with a value of 50% or more of the charter capital of an organization (determined according to the charter capital of the	Company Secretary		





STT	Disclosure content	Person in charge of providing information	Deadline for information disclosure	Reference
	organization receiving the contributed capital before the time of capital contribution).			
22.	Events that seriously affect the legitimate interests of investors	Company Secretary	Within 24 hours from the receipt of the request of the SSC, HOSE	Article 11, Circular 96/2020
23.	Information related to the Company greatly affects the price of securities and it is necessary to confirm such information	Company Secretary		

# VIETNAM DAIRY JOINT STOCK COMPANY REGULATION INFORMATION DISCLOSURE



#### C. OTHER EXTRAORDINARY INFORMATION DISCLOSURE

- Means of information disclosure: HOSE's communication portal (ECM) and the Company's website, and send a paper copy to HOSE in the following cases: application for securities listing; continued listing of shares following merger, acquisition, or corporate restructuring; application for amendment of listing registration; **final registration date documents**; auction dossiers; delisting documents; and other materials as required by the Stock Exchange.

No.	Information disclosure content	Person in charge of providing information	Deadline for information disclosure	Reference
1	Extraordinary General Meeting of Shareholders or approval of the Resolution of the General Meeting of Shareholders in the form of collecting shareholders' opinions in writing			
	- Disclosure of the Extraordinary General Meeting of Shareholders.	Company Secretary	As shown in section 3, part A of this QC	Clause 3, Article 11, Circular 96/2020
	- Collecting opinions of the General Meeting of Shareholders in writing, the company must publish on its website, and at the same time send all shareholders opinion votes, draft resolutions of the General Meeting of Shareholders and documents explaining the draft resolution.	Company Secretary	At least 10 days before the deadline for returning the opinion poll	
2	The date on which the Joint Stock Company exercises the rights of existing shareholders (excluding the date of the Joint Stock Exchange to attend the Annual General Meeting of Shareholders as presented in Article 3, Part A of this Regulation).			
	- Information disclosure on the final registration for exercising rights of existing shareholders. Form: Appendix VI, Regulation on Information disclosure of the Vietnam Stock Exchange/2021	Company Secretary	At least 10 days before the final registration date	Appendix VI, Regulation on Information disclosure of the Vietnam Stock Exchange/2021





No.	Information disclosure content	Person in charge of providing information	Deadline for information disclosure	Reference
	<ul> <li>Notice of the final registration date for rights execution.</li> <li>Form: Form 01/THQ, THQ/2025 Regulation</li> </ul>	Finance Department	At least 08 consecutive working days before the final registration date	Clause 1, Article 7, THQ Regulation/2025
	<ul> <li>Summary of the shareholders' book on the date of the AGM.</li> <li>Form: Disclosure Form/SGDHCM-10, Disclosure Regulation/2016</li> </ul>	Finance Department	Within 15 days from the final registration date	Point c, Clause 1, Article 49, Listing regulation/2025
3	In case the audit organization gives an audit opinion or a review conclusion that is not an audit opinion or a review conclusion accepts the full acceptance of the financial statements or retrospectively adjusted financial statements, the company must disclose the audit opinion, review conclusions, results of retrospective adjustment of financial statements.	Financial Accounting Department	Within the time limit specified in Article 1, Part A of this Regulation.	Clause 5, Article 11, Circular 96/2020
4	After changing the accounting period The Company announces financial statements for the period between 02 accounting periods of the old fiscal year and the new fiscal year in accordance with the law on corporate accounting.	Financial Accounting Department	Within 10 days from the date the audit organization signs the audit report but not more than 90 days from the start of the new fiscal year.	Clause 6, Article 13, Circular 96/2020
5	Disclosure of other activities			
a.	Securities offering and issuance of additional shares  Depending on the content of each offering/issuance of shares, the current detailed regulations on disclosure shall be followed, the results of the offering are as follows:			Clause 1, Article 13, Circular 96/2020





No.	Information disclosure content	Person in charge of providing information	Deadline for information disclosure	Reference
	- Offering to the public.	Company Secretary Finance Department	<ul> <li>Disclosure of the offering: 07 working days from the effective date of the certificate of public offering of securities</li> <li>Report on the results of the offering: 10 days from the end of the offering</li> </ul>	Clauses 5 & 7, Article 41, Decree 155/2020
	- Private offering.	Company Secretary Finance Department	- Report on the results of the offering: 10 days from the end of the offering	Clause 4, Article 48, Decree 155/2020
	- Issue shares for swaps.	Company Secretary Finance Department	- Report on issuance results: 10 days from the end of the issuance	Clause 3, Article 59, Decree 155/2020
	- Issuance of bonus shares to existing shareholders (Increase of share capital from equity or), issuance of shares to pay dividends, issuance of ESOPs to employees, and issuance of shares in other cases.	Company Secretary Finance Department	- Disclosure of the offering: 07 working days from the date the SSC notifies receipt of sufficient documents - Report on the results of the offering: 15 days from the end of the issuance	Clauses 3 & 6, Article 69, Decree 155/2020; Circular 118/2020; TT96/2020; THQ VSD Regulation
	Post-issuance capital use report	Finance Department		
	<ul> <li>Report to the SSC on the progress of using capital for project implementation. The same is true for the case of raising capital not to implement the project.</li> </ul>	Company Secretary Finance Department	Periodically 06 months after the issuance and report until the mobilized capital is fully disbursed,	Section a, Clause 1, Article 9 of Decree 155/2020 (Form No. 01 of the Appendix





No.	Information disclosure content	Person in charge of providing information	Deadline for information disclosure	Reference
			within 05 working days from the end of the reporting period	attached to the Decree) and Article 5 of Decree 245/2025
	The report on the use of capital, the proceeds from the offering or issuance for the implementation of the project shall be audited by an approved auditing organization at the Annual General Meeting of Shareholders	Company Secretary Finance Department	Disclosure together with the Documents of the Annual General Meeting of Shareholders or presented as an item in the Audited Annual Financial Statements	Section b, Clause 1, Article 9 of Decree 155/2020
	<ul> <li>In case there is a change in the purpose of using capital compared to the contents stated in the prospectus, the issuer must disclose the reason and decision of the Board of Directors on the change.</li> </ul>	Company Secretary Finance Department	Within 24 hours of the decision	Section a, Clause 3, Article 9 of Decree 155/2020/ND-CP (Form No. 02 in the Appendix attached to the Decree)
b.	Disclosure of foreign ownership ratio  Public companies must disclose the maximum foreign ownership ratio of their companies and changes related to this ownership ratio on the company's website, HOSE, Vietnam Securities Depository and Clearing Corporation and the securities disclosure system of the SSC in accordance with the securities law guiding foreign investment activities Vietnam's stock market.	Legal Department	Within 1 day from the date of receipt of approval from the SSC	Clause 2, Article 13, Circular 96/2020
C.	Disclosure when buying and selling treasury shares			Clause 3, Article 13, Circular 96/2020





No.	Information disclosure content	Person in charge of providing information	Deadline for information disclosure	Reference
	In case a public company buys back its own shares or sells treasury shares, the company must carry out disclosure in accordance with the law on the repurchase of its own shares and sale of treasury shares.	Company Secretary Finance Department		
	In case the company buys back its own shares, after paying off all the repurchased shares, if the total value of assets recorded in the accounting books decreases by more than 10%, the company must notify all creditors and disclose.	Company Secretary Finance Department	Within 15 days from the date of completion of the obligation to pay for the repurchase of shares.	

## D. INFORMATION DISCLOSURE OF OTHER SUBJECTS

- Other subjects include:
  - o Major shareholders and groups of related people own 5% or more of the Company's voting shares.
  - o Internal person and related person of internal person.
- Other subjects are responsible for implementing information disclosure according to the provisions of Articles 31, 33 and 35, Circular 96/2020.
- The Investor Relations Department is responsible for disclosure on the company's website within 03 working days after receiving documents from these other entities.