



**GOLDEN SHIP Co., Ltd**

# CODE OF CONDUCT & ETHIC



## Our Services

- Air freight
- Ocean freight
- Customs brokerage
- Inland trucking
- Multimodal transport
- Project logistics
- Delivery door to door

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## A MESSAGE FROM GENERAL DIRECTOR

Welcome to Golden Ship's Code of Conduct and Ethics (GCE). This is the foundation document for our culture here at Golden Ship. It sets out the ethics and values by which Golden Ship will do business. Our approach to the GCE is simple. It is everyone's responsibility to ensure compliant and ethical behavior in Golden Ship and in connection to Golden Ship's business, that is why we require all our staff and third parties that provide services to or on our behalf to read, understand and adhere to the GCE.

I want to emphasize our stance against all forms of corruption and our uncompromising approach to any breach of policy. Our policies consider all applicable anti-corruption laws is a mandatory requirement and is controlled by Golden Ship's policy.

We do not expect anything more than to full compliance with our the Code of conduct and ethics. The guidelines is set up in the GCE related to any position and role in the Golden Ship, and to all our collaborate. Thank you for taking personal responsibility for our values. By complying with the GCE, you are helping Golden Ship have the trust and respect necessary to meet the mission and vision of us as a company. If you have any questions about the content of the GCE, please contact the Compliance & Ethics ([compliance@goldenshipvietnam.com](mailto:compliance@goldenshipvietnam.com))

Respectfully,

General Director.  
**Nguyen Xuan Bac**

Golden Ship

## 1. THE ROLE OF THE CODE OF CONDUCT & ETHICS

Golden Ship commits to the Code of Conduct and Ethics (GCE), which outlines the commitments that each of us make. The GCE is based on our Shared Values and reflects our core belief that, at Golden Ship - at Deloitte, ethics and integrity are fundamental and not negotiable.

The company carries out business with honesty and respect for human rights, as well as the employees benefits. All employees and our business partners are expected to apply these principles and act in accordance with them.

Our leaders have the responsibility to set an example with a positive attitude to lead employees and making business decisions consistent with the GCE. The GCE establish code of conduct, against corruption, make sure people are respected, safety information, and set up the standards for external transactions.

Responsibility of each employee is to increase awareness about the strategic vision of Golden Ship and comply with the Code of Conduct and business ethics for the better development and create value chains credible.

Golden Ship

## 2. CODE OF CONDUCT & ETHICS

Our growth is built on our core principles, and applies to all Golden Ship's directors, managers, employees and business partners (including joint venture, subcontractors, agents and vendors). We also take to assess and reduce potential risks in our relationships with customers and vendors.

### 2.1. OUR PEOPLE & CULTURE

#### ✚ Respect and fair treatment

- Respect the rights of all employees
- Encouraging open and honest communication in the workplace, employees can talk to their managers about their ideas, concerns or problems and work together to resolve conditions issues.
- Support and promote diversity and participate actively in all the work at the company, promote human cohesion, perspectives, talents and experience;
- Providing a safe, healthy, no violence, harassment, intimidation and other unsafe or disruptive conditions.



#### ✚ Health and safety



- Safety rules must be remembered and followed at all times, avoiding any situation that could cause an accident.
- Complying with the rules at work and operation of the Health & Safety.
- Take the time to read, learn and implement safety rules during operational activities in the site.
- To seek assistance immediately from the manager directly or contact the HSE (Health - Safety - Environment) in which you work when there are any concerns or questions about the application of Safety Rules.

#### ✚ Drugs and alcohol

- Use of alcohol and illegal drugs can create serious health and safety risks in the workplace.
- In exceptional cases, alcohol may be served in Golden Ship offices however must have control & safety limits and prior management approval.
- Golden Ship prohibits the use, possess stimulants in any form.



**Privacy and data protection**



- We are committed to complying with applicable laws and regulations governing privacy and data protection.
- To use it only for legitimate purposes; keep it secure and confidential.
- We shall not disclose people’s personal information to any person or entity outside unless expressly authorised to do so.

**Integrity**



- Integrity means always trying to do the right thing, the first time, every time. at every level, the people of Golden Ship are expected to be honest, trustworthy, candid, and straightforward in all dealings.
- All personnel are encouraged to exceed the expectations of clients — and each other — by seeking to do not only what is legal, but also what is right.
- We believe that our people work best in a culture of trust, and we are committed to fostering and maintaining such a culture.
- Honesty in the dealings with each other is essential. We are each individually responsible for both the quality and the on-time completion of our work.
- We must also accurately and honestly account to each other for time worked and expenses incurred for both internal and client-related activities.

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## 2.2. LAW & RISK MANAGEMENT

### ✚ Anti-bribery and corruption

- Golden Ship absolute commitment against all forms of bribery and corruption in Vietnam and those countries where companies exchange transactions and activities
- We are against corruption in any form and stand firmly against bribery. We do not take bribe nor take bribes, not incite or allow any other party to perform or giving bribes on our behalf.
- The promise, offer, solicit, give or receive any bribe does violate the policy of the Golden Ship, may be guilty and will lead to the implementation of measures appropriate discipline (including ability to terminate the contract work).

### ✚ Government transactions and relations

- We comply with all applicable rules, laws, and regulations relating to the prohibition of political lobbying or attempting to influence government officials.
- All personnel involved in providing services to governmental entities are required to adhere to the government's ethical standards as they apply to the services of the firm, as well as the GCE.

### ✚ Anti-money laundering

- It is the obligation of everyone in Golden Ship not to commit money laundering offences. We are committed to complying with all applicable laws and regulations concerning anti-money laundering efforts.
- We will conduct business with clients, agents of good reputation who are involved in lawful business activities.
- We will not knowingly accept funds that are derived from unlawful sources or activities.



### ✚ Supplier, contractor and alliance partner relationships

- Our success depends on building productive relationships with all suppliers, contractors, and alliance partners based on integrity, ethical behaviour, and mutual trust. Regardless of whether there is an existing or future client relationship, we select suppliers, contractors, and alliance partners based on the quality, price, service. Procurement decisions should be based on objective business rationale and not on personal interest or bias.



### **✚ Gifts and entertainment**

- We strive to compete on the basis of the quality and value of our services. Personnel of Golden Ship should not offer or accept gifts or payments, or undertake inappropriate activities, to facilitate any engagement.
- Neither you nor any member of your immediate family should use your position with the firm to solicit any cash, gifts, or free services from any client, supplier, contractor, or alliance partner for your or anyone else's personal benefit.
- In all cases, you have a responsibility to know and understand the firm's detailed guidance on acceptable client entertainment, as well as the client's own policies related to allowable gifts and entertainment of the Golden Ship's policies Anti-bribery and anti-corruption.



## **2.3. INFORMATION MANAGEMENT**

### **✚ Company assets**

- Golden Ship is committed to safeguarding the proper use of our assets. Following the security requirements at your facility, not sharing your Golden Ship passwords, do not print or copy business documents without permission.
- Making sure you keep your laptop secure while work outside, traveling, work from home, following the Golden Ship Business Rules, protecting Golden Ship's intellectual property. We must respect other people and companies' intellectual property rights.
- Golden Ship's assets also includes good to use of your time. While we certainly value breaks during the workday and allow incidental personal calls, emails, and other activities, your time at Golden Ship should be time for Golden Ship.

### **✚ Internal information - Information Security**

- You must take special care of confidential information you are exposed to.
- In the course of our business activities, you may become aware of non-public information regarding the business, operations or securities of Golden Ship, or our customers or vendors. Golden Ship strictly prohibits trading securities on the basis of non-public information ("insider information").
- Confidential information is protected by the policies of the Golden Ship and existing laws in Vietnam and the countries where the company has business operations. Golden Ship strict compliance with company policies and procedures to protect confidential information, and do not share confidential information to third parties.



### ✚ Records documents management

- We will maintain all records in accordance with the legal and business requirements appropriate to our profession. To help preserve the integrity of the record-keeping and reporting systems, all personnel have an obligation to know and comply with all current applicable records retention policy and procedures.
- These include how data is shared, stored, and retrieved, and the circumstances under which it may be disposed of.
- Guarantee storage term of the customer's file, support for the purposes of customs-clearance checks.



### ✚ Communications

- Golden Ship permits appropriate, responsible, business-related use of social media to enhance our interactions and communications with customers, colleagues, suppliers, business leaders, media, and others.
- Posting Golden Ship related information on social media is restricted to personnel approved by Marketing & Communications per Golden Ship's Social Media Policy .
- You MUST NOT represent your postings, comments, positions, or beliefs as Golden Ship's if you are using social media personally. The company will strictly disciplinary employees who use their personal status to affect the reputation of Golden Ship.

## 2.4. EMPLOYEE RESPONSIBILITIES

### ✚ Customers, suppliers and business partners

- Golden Ship is committed to providing services with the highest quality standards and we must constantly work to improve processes, ensure the benefits for customers. All Golden Ship employees must understand the global requirements and local nature of the customer and the market.
- When selecting business partners, we seek third parties on our behalf, ensuring compliance with applicable laws, regulatory requirements, and standards of integrity and fairness.
- We do not tolerate illegal acts or unethical by vendors, contractors and our alliance.

### ✚ Quality of service

- Our reputation not only depends entirely on the integrity of the staff, but also depends on the quality of service that we provide. Expectations about the quality of service is defined in a simple way - is the peace of mind of customers using Golden Ship's service. Our services offers to meet all the criteria of logistics & supply chain.
- Each employee is responsible for the quality of the professional services that we have offered. The commitment to quality is implemented at three levels: individual, team and organization. At each level requires dedication and pride in the work they have done and a professional skepticism in a reasonable manner when working.

### ✚ Licensing and professional certifications

- In order to deliver on our promise of best and most competitive service, at Golden Ship we all maintain licenses such as the International Multimodal Transport License, Customs Brokerage License, Customs Agent Certificate.
- All personnel holding professional licenses and certifications have a personal responsibility to maintain such licenses and certifications in good standing through timely renewals, and (where required), the attainment of the appropriate level of continuing professional education.

### ✚ Professional competence and due care

- We observe our profession's standards of performance in providing professional services.
- We continually strive to improve the quality of services to clients and exercise due care in the management of client engagements by matching client needs with personnel who have the appropriate technical training and the competence required for their assignments.

### ✚ Responsibility to society and community involvement

- We are committed to conducting our business activities in ways that honour ethical values and respect people, communities, and the natural environment.
- We will continue to work toward the sustainable improvement of life and business by:
  - ✓ Rendering high-quality professional services with utmost integrity;
  - ✓ Providing a workplace that contributes to the professional growth, development, and personal success of our people.

### ✚ Consultation

- We are committed to a consultative culture. As a minimum, consultation on non-routine or emerging issues or practices is not only expected, it is required.
- Golden Ship has an established procedure to allow any professional the right to appeal and resolve any professional disagreements that might arise. As professionals, we have a duty and an obligation to express differing points of view and appropriately resolve such matters in an open-minded and professional manner.

### ✚ Conflicts of interest

- As professionals, we make business decisions every day. In making such decisions, we are responsible for remaining free from the influence, or the appearance of influence, of any conflicting interests, and for conducting business ethically and legally. We have a duty to avoid making business decisions that place personal interests ahead of those of Golden Ship.



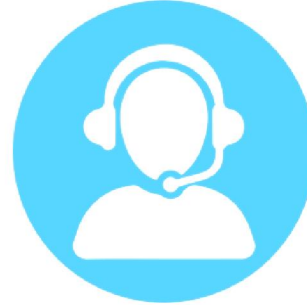
### 3. WHERE TO FIND HELP

#### 3.1. WHERE TO GO FOR HELP AND HOW TO REPORT

For assistance with ethics and compliance matters, and to report potential violations, you should contact your supervisor, or office line leader or practice entity head.

You should turn to the Ethics Helpline in the following circumstances:

- ✓ If you believe that ethics and compliance issues are not being resolved, either through the existing managerial chain of command or other reporting options;
- ✓ If you do not feel comfortable reporting through normal channels;
- ✓ If you would like confidential assistance on ethics and compliance issues; or
- ✓ If you wish to remain anonymous when filing a report.



#### 3.2. WHEN MAKING A REPORT

When making a report to the Ethics Office of Golden Ship:

- ✓ You are requested to provide the most detailed information possible about the incident you are reporting — who, what, why, where, when and how.
- ✓ You are asked to identify yourself. Every reasonable effort will be made to keep your identity confidential. You may choose to remain anonymous; however, doing so may prevent us from fully investigating the matter. Therefore, you will be encouraged to identify yourself whenever possible
- ✓ The Ethics and Compliance Office will accept and acknowledge all reports that are not anonymous within three working days and then determine the appropriate next steps.
- ✓ You may send an anonymous report via email to: [compliance@goldenshipvietnam.com](mailto:compliance@goldenshipvietnam.com)
- ✓ Reprisals or retaliation against any person because he or she, in good faith, reported an ethics or compliance concern will not be tolerated.
- ✓ Disciplinary action is based on substantiated findings, not simply on the contents of a report.





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