

**CORPORATE
COMPLIANCE
POLICY**

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I. Introduction

Dear employees,

TANNER Vietnam aims to create value for its stakeholders, its employees and society as a whole. We can only sustain an increase in corporate value if we act within the law and in accordance with ethical principles.

Every employee is responsible for ensuring that his or her conduct is legally and ethically compliant. This applies to employees at all levels. All our actions must be consistent with our good name and reputation.

After all, business partners, investors and the public expect us to be competent, fair and reliable. My colleagues on the Management Team and I are proud of employees who conduct themselves accordingly.

Due to the growing importance of good and responsible corporate governance, the Management Team has decided to issue our Corporate Compliance Policy. Based on the proven principles that characterize our business operations and clearly explains where and how you can obtain help with compliance questions.

Let us work together to uphold TANNER Vietnam's reputation. Integrity forms the basis for sustained success.

Elmar Dutt

Managing Director

II. Our Principles of Business Conduct

Why be concerned about corporate compliance policy?

1. We are committed to fair competition – no antitrust violations.
2. We are committed to integrity in business dealings – no corruption.
3. We are committed to the principle of sustainability – no inappropriate risks for human health and the environment.
4. We are committed to upholding national and foreign trade laws – no import and export infractions.
5. We are committed to proper record-keeping and transparent financial reporting – no deception.
6. We are committed to fair and respectful working conditions – no discrimination.
7. We are committed to protecting the fruits of our own endeavors and respecting the legally recognized rights of others – no infringement of our own or others' property rights.
8. We are committed to keeping corporate and personal interests separate – no conflicts of interest.
9. We are committed to cooperating with the authorities – no misinformation.
10. We are committed to protect and safeguard the environment.

III. Content

Message from TANNER Vietnam Ltd.

Because TANNER Vietnam is committed to promoting strong business ethics and accountability within the company, we are very focused on corporate compliance. Compliance basically has to do with following the Vietnam Labor Law. The mission of our compliance team is to promote and monitor compliance with applicable laws, rules and regulations. This includes regulations of the Vietnam Labor Code, fraud and abuse matters, ethics, privacy security requirements and corporate governance.

We are committed to fair competition – no antitrust violations.

1. Always obey The Law

We will conduct our business in accordance with all applicable laws and regulations. Compliance with the law does not compromise our ethical responsibility. Rather, it provides the minimum, absolute and essential condition of the performance of our duties.

2. Decline Inappropriate Gifts.

TANNER Vietnam employees may accept meals, refreshments or entertainment of nominal value in connection with business discussions. While it is difficult to define “nominal” by means of a specific Vietnam Dong amount, anything considered lavish, extravagant or frequent is inappropriate. It is each employee’s responsibility to ensure that his or her acceptance of such meals, refreshments, or entertainment is proper and could not reasonably be construed in any way as an attempt by the offering party to secure favorable treatment.

TANNER Vietnam employees are not permitted to accept funds in any form or amount, or any gift that has retail or exchange value of 200.000 VND or more from individuals, companies or representatives of companies having or seeking business relationships with TANNER Vietnam. If you have any questions about the propriety of a gift, gratuity or item of value, contact your line manager for guidance.

In addition, managers and employees are prohibited from giving anything of value to public officials as an inducement to have a law or regulation enacted, defeated or violated or to affect the outcome of any governmental proceeding or matter.

If there is any question regarding the appropriateness of accepting or giving a gift, offer of entertainment or other items of value, employees should seek approval by CFO or Managing Director.

We are committed to integrity in business dealings – no corruption

3. Carefully Negotiate and Perform Contracts

If you are involved in proposals, bid preparations or contract negotiations, you must be certain that all statements, communications and representations to prospective partners or suppliers are accurate and truthful. Once awarded, all contracts must be performed in compliance with specifications, requirements and clauses.

We are committed to the principle of sustainability – no inappropriate risks for human health and the environment.

All of our employees are responsible for maintaining a safe and healthy work environment. We must comply with local health and safety laws and regulations, including the rules and regulations of Occupational Safety.

Such laws include restrictions regarding the disposal, handling and shipment of hazardous waste, the discharge of pollutants into the water and river systems, and the emissions of contaminants into the air. Failure to comply with applicable environmental laws could expose TANNER Vietnam and its employees, under certain circumstances, to civil and criminal enforcement. TANNER Vietnam and its employees shall conduct the Company's business operations so as to comply.

Occupational health and safety

Maintaining the health of our employees is in everyone's – the employees' and the company's – best interests. Line management receives support in preventing accidents and illness from specialists in occupational medicine and safety who strive to maintain and improve safety and health.

Occupational health and safety regulations help to ensure this. Employees share in the responsibility for occupational safety in the workplace. Sometimes accidents occur because we become less careful.

Extreme care must be exercised when dealing with potential sources of danger. Every employee is called upon to strictly and constantly observe all safety rules in his or her respective workplace: for his or her personal benefit, and for the benefit of colleagues and the company as a whole.

When an incident occurs, the responsible supervisors and safety representatives must immediately notify those units of the company responsible for health, safety and environmental protection.

Plant safety

Plants in the office and in the top roof garden require careful planning and regular, systematic inspection and servicing in order to prevent malfunctions, releases, and major hazards. Employees who work in our plants must be thoroughly trained, be given detailed working instructions and be properly supervised.

We are committed to proper record-keeping and transparent financial reporting – no deception

4. Accounting, Internal Accounting Controls Or Auditing Matters

All accounting entries, books and records of TANNER Vietnam shall properly and fairly reflect its assets, liabilities and results of operation. No fund shall be created or maintained by TANNER Vietnam for any purpose that is not properly reflected in its books and records. All employees shall account for every transaction by, or with, the Company in accordance with the Company's prescribed accounting policies and procedures.

We are committed to fair and respectful working conditions – no discrimination

TANNER Vietnam is committed to the fair and equal treatment and consideration of all employees, without regard to race, color, religion, sex, national origin, ethnicity, age, disability, veteran status, pregnancy, marital status, sexual orientation or any other factor protected by law.

5. Treat All Employee With All Respect, Dignity And Fairness

TANNER Vietnam is committed to maintaining a workplace that is free from unlawful discrimination, harassment or intimidation and prohibits all forms of unlawful discrimination and harassment, whether based on race, color, religion, sex, national origin, ethnicity, age, disability, veteran status, pregnancy, marital status, sexual orientation or any other reason prohibited by law. TANNER Vietnam will not discriminate in hiring, promotion, training, pay, benefits, terms, conditions or privileges of employment on the basis of an individual's race, color, religion, sex, national origin, ethnicity, age, disability, veteran status, pregnancy, marital status, sexual orientation or any other reason prohibited by law. Any conflicts should be referred to the employee's Team Leader, the human resources department or the responsible Compliance Officer, who, if necessary, will take the required action to appropriately address any wrong doing and to prevent a repeat violation.

Employees will be hired, promoted and compensated according to their qualifications, performance and potential. We will not tolerate harassment by anyone based on the diverse characteristics or cultural backgrounds of those who work with us. Degrading or humiliating jokes, slurs, intimidation, or other harassing conduct is not acceptable in our workplace.

6. Retaliation

The Company will not tolerate retaliation against any employee who has opposed an unlawful employment practice or because he/she has made an allegation or charge, filed a charge, testified, assisted, or participated in any manner in an investigation, proceeding or hearing involving an employment practice allegation. Any employee found to be engaging in

any act of retaliation will be subject to disciplinary action, up to and including termination.

We are committed to protecting the fruits of our own endeavors and respecting the legally recognized rights of others – no infringement of our own or others' property rights.

7. Proper Use Of TANNER Vietnam's Assets

The results of our technical development work are extremely valuable business assets. Employees must respect the valid, legally recognized property rights of third parties and may not use them without permission.

All managers and employees shall protect TANNER Vietnam's assets and ensure their efficient use. All TANNER Vietnam assets should be used only for legitimate business purposes.

We are committed to keeping corporate and personal interests separate – no conflicts of interest

TANNER Vietnam has the right to expect undivided loyalty from its managers and employees. Managers and employees must avoid situations where their personal interests could conflict or even appear to conflict, with the interests of the Company. Company personnel are prohibited from holding any financial interest or engaging in any business relationship that impairs or prevents the proper discharge of his or her duties to the Company.

8. Avoid Conflicts Of Interest

A conflict of interest may occur if your outside activities or personal interests influence or appear to influence your ability to make objective decisions in the course of your job responsibilities. A conflict of interest may also exist if the demands of any outside activities hinder or distract you from the performance of your job or cause you to use TANNER Vietnam resources for other than TANNER Vietnam purposes. It is your obligation to ensure that you remain free of conflicts of interest in the performance of your responsibilities at TANNER Vietnam. If you have any question about whether an outside activity might constitute a conflict of interest, you must obtain the approval of your supervisor before pursuing the activity or contact the Management team.

We are committed to cooperating with the authorities – no misinformation.

All employees responsible for collecting company information and communicating it to securities market authorities, to other regulatory authorities or for other public announcements should communicate such information completely, openly, correctly, timely and understandably.

The responsible legal department must be notified immediately when employees are contacted by any authority, such as the police or public prosecutor's office, whose job it is to investigate possible legal violations or prosecute violators. In particular, information or documents should be provided only after consulting and with the assistance of the responsible legal department.

9. Company Sensitive Information and Protect client confidentiality

Every employee of TANNER Vietnam is required to maintain the utmost confidentiality concerning the project information, customer information...

Managers and employees shall not use confidential information of TANNER Vietnam for personal benefit. All proprietary data and technology of TANNER Vietnam shall be kept confidential, both during and after the term of employment. Managers and employees have an obligation and duty to protect and safeguard confidential information of TANNER Vietnam.

We are committed to protect and safeguard the environment

10. Green office

A greener workplace can mean a lighter ecological footprint, a healthier and more productive place to work, and good news for the bottom line. Whether you're the manager or the employee, whether your office is green already or still waiting to see the light, some practical steps can lay the groundwork for a healthy, low-impact workspace. It is the reason why we applied the Green Office program developed by World Wide Fund at, is applied in TANNER Vietnam. The Environmental Management System (EMS) – policy has been developed for the purpose:

- Make TANNER Vietnam workplace more environmentally friendly.
- Change staffs' habits and behavior for a big impact on climate change.
- Savings for company business
- Improve corporate image and publicity
- Improve employee motivation
- Improve brand association
- Networking with other local and international Green Office members.

IV. Implementation

1. The company provides employees with access to all the necessary information resources and counsel to prevent violations of the law or company regulations.
2. Every supervisor must organize his or her area of responsibility so as to ensure adherence to company rules and applicable law and thus to the Corporate Compliance Policy.
3. The holding company appoints Compliance Officers, whose responsibilities include providing advice and training on compliance issues and investigating any alleged compliance violations.
4. All employees are required to immediately report any violations of the Corporate Compliance Policy by using the Anonymous Incident Reporting.