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VIETCIS SENSITIVE TRANSACTION APPROVAL PROCEDURE

1. Purpose

To ensure that sensitive transactions are conducted transparently and in compliance with VietCIS anti-corruption principles.

2. Scope

This procedure applies to all employees and covers transactions involving gifts, hospitality, travel, and other benefits.

3. Definition

Sensitive transactions refer to any transaction that may involve a personal benefit or could be perceived as influencing business decisions.

4. Types of Sensitive Transactions

- Gifts and hospitality
- Travel and accommodation expenses
- Payments related to customer engagement
- Any discretionary expense involving external stakeholders

5. Approval Requirements

- Transactions below 1,000,000 VND:
 - Approval by direct manager
- Transactions from 1,000,000 – 5,000,000 VND:
 - Approval by department head
- Transactions above 5,000,000 VND:
 - Approval by Director

6. Rules

- Cash payments are prohibited
- Gifts must be reasonable and not influence decisions
- All transactions must be documented

7. Recording and Monitoring

- All transactions must be recorded
- Management reviews periodically

8. Compliance

Violations may result in disciplinary actions.

Approved by VIETCIS Management.

Date: 01 January 2026

Review Date: January 2027

Authorized by: Director – Duong Hoai Nam



GIÁM ĐỐC
Dương Hoài Nam