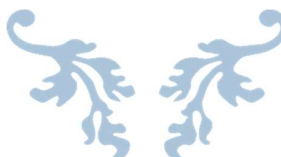




IMEXPHARM CORPORATION

CODE OF CONDUCT



2020

No.4, 30/4 Street, Ward 1, Cao Lanh City, Dong Thap Province

TABLE OF CONTENTS

MESSAGE FROM THE CHAIRMAN OF THE BOARD OF DIRECTORS	2
I. SCOPE OF APPLICATION	3
II. PURPOSE:	3
III. TERMINOLOGY:	3
IV. CONTENTS OF THE CODE OF CONDUCT.....	4
Article 1: Integrity and transparency.....	4
1. Commitment of Imexpharm	4
2. Standard of Imexpharm	4
3. Responsibilities and Compliances	4
4. Securities and Confidentiality	4
Article 2: Customers	5
1. Commitment of Imexpharm	5
2. Imexpharm obligations.....	6
3. Complaints and Conflicts Resolutions	6
Article 3: Partners.....	6
1. Commitment of Imexpharm	6
2. Imexpharm obligations.....	6
3. Partners’ obligations.....	7
4. Conflicts resolutions.....	7
Article 4: Shareholders/Investors	7
1. Commitment of Imexpharm	7
2. Imexpharm obligations.....	8
3. Building Imexpharm sustainable, modern, friendly and leading image.....	8
4. Rights and Obligations of Shareholders.....	8
5. Conflicts and disputes resolutions.....	9
Article 5: Imexpharm employees	9
1. Commitment of Imexpharm	9
2. Imexpharm Responsibilities	10
3. Imexpharm Employees Code of Conduct.....	10
Article 6: Local Communities	11
1. Imexpharm Commitments.....	11
2. Imexpharm responsibilities	12
V. ORGANIZATION OF IMPLEMENTATION.....	12

MESSAGE FROM THE CHAIRMAN OF THE BOARD OF DIRECTORS

Dear Valued Colleague and Stakeholders,

Sustainable development has become a guide of Imexpharm Corporation in the trend of integration and globalization. Beside the laws, compliance within the Company is put on top priority in any aspect of the Imexpharm's operations.

*Imexpharm acknowledges that to keep the leading position firmly and improve corporation image, the Company must both obey the government policies and the standards Imexpharm has established. Hence, Imexpharm **Code of Conduct** is issued in order to aim to internal and external fairness, transparency and integrity. The Code of Conduct is a guideline for each Imexpharm employee in daily works; In addition, this Code of Conduct also focuses on the Stakeholders to ensure harmonious benefits among Imexpharm Stakeholders and the Company. Furthermore, the Code of conduct is a commitment to ethical business that Imexpharm wishes to convey to the Company's employees, doctors and medical technicians, pharmaceutical staff, scientists and local authorities.*

Bearing the mission “Offering high effective solution for public healthcare”, Imexpharm always accompanies reliably with the community in the caring path for residences' health. Each Imexpharm staff has been responsible for complying with the rules in the Code of Conduct to accomplish excellently the Company's mission. Imexpharm partners, who are going together with Imexpharm in this journey, are expected to follow the standards that Imexpharm encourages to build a long lasting and intimate relationship as well as co-develop with the Company.

I highly appreciate cooperation and compliance of Imexpharm's employees and partners to support the Company growth and exist year over year in the firm foundation as Imexpharm philosophy that “1000 year after lotuses still bloom”

Yours Sincerely.

Chairman of the Board of Directors

Mr. Nguyen Quoc Dinh

All concerns or opinions about the Code of Conduct shall be sent to:

Nguyen Thi Kim Le – Corporate Secretary

Email: lenguyen@imexpharm.com

Tel : (84 28) 3866 9856 (Ext: 105) | Fax: (84 28) 3865 9893

Mobile: (84) 917 978 844

Address: 63B-65B, No.2 Street, Lu Gia Block, Ward 15, District 11, Hochiminh City

Web: www.imexpharm.com

IMEXPHARM CORPORATION CODE OF CONDUCT

I. SCOPE OF APPLICATION

This Code of Conduct is the document guiding generally about ethics and compliances for Imexpharm Corporation employees and sets the standards on ethical behavior and compliance to fulfil duties at Imexpharm. All Imexpharm staff have to study carefully and rely on this Code of Conduct to have appropriate actions once dealing with issues at the workplace.

This Code of Conduct is also recommended for Partners, Shareholders, Investors, Customers and third Parties having transactions with Imexpharm and cannot replace contracts or agreements between Imexpharm and Partners, Customers or third Parties as stated above.

II. PURPOSE:

This Code of Conduct is considered to be the standards of behaviors in term of ethics and compliance with regulations implemented for all Imexpharm employees and recommended for Partners, Shareholders, Investors, Customers and third Parties having relevant transactions with Imexpharm as well as Partners of Imexpharm.

III. TERMINOLOGY:

Law: the laws of Vietnam for all operations of the Company

Imexpharm: Imexpharm Corporation

Set of Rules: The Code of Conduct

Partners: objects performing business cooperation with the Company: suppliers, distributors, etc.

Customers: the persons who buy Imexpharm products or use Imexpharm services

Third Parties: being related to Imexpharm's operations, Partners of Imexpharm.

Shareholders: being individuals or organizations owning a least 1 share of Imexpharm.

Investors: being organizations, individuals that operate to invest in businesses including domestic, foreign investors and economic organizations having foreign investment.

Confidential information: information defined as confidentiality based on laws, regulations and agreements between Imexpharm and third parties that have a transaction or expected to have a transaction with Imexpharm.

IV. CONTENTS OF THE CODE OF CONDUCT

Article 1: Integrity and transparency

1. Commitment of Imexpharm

Imexpharm is a public company specializing in producing effective and high quality products in pharmaceutical market; it is founded by individuals who are passionate and expert in Vietnam pharmaceutical industry.

Imexpharm commits to comply with the Laws on quality and safety for users. Imexpharm pledges to obey all regulations of the Vietnamese government for listed enterprises and of the pharmaceutical industry. The Company is operating in the honorable, transparent and effective principles.

2. Standard of Imexpharm

Imexpharm always propagates to instruct all employees of Imexpharm to understand and behave rightly in compliance with the Code of Conduct and traditional good practices of the Vietnamese Society.

In term of production, the Company is developing in the way of implementing European technical standards to manufacture high quality drugs priced affordably for the Vietnamese people.

3. Responsibilities and Compliances

Imexpharm has undertaken responsibilities to cooperate with the authorities, partners to serve the community with high effective healthcare solutions for residences; to fulfil sufficiently duties with the government as regulated by laws. Imexpharm is dedicating to build a sustainable society and fighting against unfairness.

4. Securities and Confidentiality

Imexpharm commits to comply with terms and conditions on confidentiality agreed by the Company and Employees, Partners, Customers, Shareholders, Investors. The Company shall friendly cooperate with the Stakeholders in dealing with issues related to confidentiality.

Imexpharm commits to self-implement or coordinate to implement security solutions necessarily in order to protect information to assure legal rights and benefits of the Parties.

Imexpharm commits to not use confidential information communicated or provided by Partners, Investors against the purpose of such agreement or the legal regulations.

All documents, information disclosed in the official website of Imexpharm at the address: www.imepxharm.com are the Company's assets and protected by laws. Imexpharm is waived any responsibility as the result of copy, revision of information of Partners, Customers, Shareholders, Investors and third Parties having or not having related transactions with Imexpharm without Imexpharm permission by a written form or being approved by Imexpharm but not mentioning clearly the reference source from Imexpharm website.

All methods of copy information about Imexpharm products and services from the official website of Imexpharm need to be approved by Imexpharm in a written form before starting to implement.

Individuals or organizations who wish to use information being relevant to features of Imexpharm brand awareness such as logo, pictures, name, brand image, etc. have to be approved by the Company in a written form. Imexpharm has registered and been protected the rights towards the above factors. In case that individuals or organizations use such information without the approval of Imexpharm, they have to take responsibility in accordance with laws.

Although information disclosed in Imexpharm's website have been reviewed and approved by Imexpharm leaderships. The Company does not assure the accuracy of information in case of being hacked intensively or non-intensively; changes caused by scientific researches newly published; changes of policies; or regulations of the Government not to be updated, which leads to incorrect information.

Imexpharm employees are responsible for keep relevant information confidential in accordance with regulations on confidentiality of the Company; other agreements with partners and; Laws on confidentiality of Vietnam.

Article 2: Customers

1. Commitment of Imexpharm

Imexpharm commits to accompany with Customers and Patients, provide high effective solutions of treatments and continuously improve product quality for a healthy community. Imexpharm has pledged to supply products in compliance with technical standards indicated in products packages approved to circulate by the authorities.

Imexpharm is waived responsibility for any willful misconduct and carelessness in using Imexpharm products without following the prescriptions, cautions or; not store Imexpharm products in compliance with instructions presented in label or leaflet attached in packages.

In any case, Customers are only allowed to use Imexpharm image for the purposes mentioned in a written agreement between Imexpharm and Customers.

2. Imexpharm obligations

Imexpharm is in charge of quality assurance, safety for all products, services officially branded as Imexpharm.

Imexpharm is responsible for addressing all concerns related to products that Imexpharm manufactures and distributes. Moreover, the Company takes responsibilities to build a contact channel with customer effectively in order to ensure that all customers can speak to the Company in case of needing an assistance, advices about products and services.

Imexpharm is responsible for solving reasonable and legal complaints from Customer about the Company's products and services.

3. Complaints and Conflicts Resolutions

All doubts, complaints of Customers are resolved by communication in equality and in principles of respect all Customers' legal rights. Imexpharm takes responsibility within the Company's scope and under laws for verifying information provided by Customers to solve conflicts.

All complaints of Customers are solved as soon as possible and in compliance with laws and the Company's policies.

Article 3: Partners

1. Commitment of Imexpharm

Imexpharm commits to build a good business environment and cooperate with Partners based on mutual beneficial principle to aim to sustainable development.

Imexpharm promises to boost transparency in business, does not accept to participate in as well as support any fraud to win in business.

Imexpharm commits to comply with agreements signed with Partners.

Imexpharm declares to waive responsibilities for Imexpharm images, logo being used for private purpose without approval in a written form of Imexpharm. Imexpharm reserves all rights for all images, logo of Imexpharm and Partners may be take legal responsibility for such an infringement.

2. Imexpharm obligations

Imexpharm commits to collaborate with the authorities and community to create a transparent environment in which Partners are treated fairly and there is no bias.

Imexpharm is in charge of providing information most accurately, clearly to describe Imexpharm's need to Partners before signing agreements in order to ensure that terms and conditions for each Party are set smoothly, transparently and in compliance with the laws, the Charter and regulations of Imexpharm.

3. Partners' obligations

Partners have to comply with laws and agreements, regulations that are concurred with Imexpharm.

Partners should coordinate closely with Imexpharm to ensure the progresses that are agreed by two (02) or more parties.

Suppliers are not allowed to collude with Imexpharm employees to earn profits or win tenders; which negatively influences to Imexpharm benefits and credibility of suppliers.

Partners have to inform Imexpharm leaderships if a fraud or untruth of Imexpharm employees is found.

Partners are not allowed to use Imexpharm image without an approval in a written form by the Company.

4. Conflicts resolutions

Imexpharm tends to solve conflicts and disputes with Partners in harmonious principles and goodwill that bring mutual benefits. The Company uses communication to solve such an issue based on laws and mutual respect.

Imexpharm absolutely refuses any violence in solving disputes.

Article 4: Shareholders/Investors

1. Commitment of Imexpharm

Imexpharm commits to disclose sufficiently information as required by laws to all Shareholders and Investors.

Imexpharm pledges to treat fairly and impartially among Shareholders.

Imexpharm commits to keep business stabilized and create a transparent environment for Investors to be secured in investing in the Company.

Imexpharm commits information disclosed to Shareholders/Investors that is checked and verified carefully thanks to a control procedure in compliance with laws and Imexpharm regulations.

Imexpharm always puts efforts to keep image of a leading pharmaceutical company which manufactures high quality products. Imexpharm commits to protect at highest level for technical

infrastructures, intangible and tangible assets and other assets of the Company; and fight against any violence to destroy such kind of asset.

2. Imexpharm obligations

Imexpharm is responsible for boosting business performance and disclosing information timely in accordance to Laws to Shareholders/Investors

Imexpharm is in charge of convene the annual meetings of the General Meeting of Shareholders and extraordinary meetings in compliance with laws. Imexpharm shall hold to implement Resolutions of the General Meeting of Shareholders in term of business, production and other managerial activities.

Imexpharm shall self-implement or coordinate to implement appropriate solutions to protect and preserve intangible, tangible assets and others of the Company.

Imexpharm takes responsibilities to hold periodical or requested investors meetings based on cooperative and respective spirit for each party.

3. Building Imexpharm sustainable, modern, friendly and leading image

Imexpharm collaborates with existing Shareholders in building the Company image followed the trend of sustainability, which is the leading pharmaceutical company in Vietnam regarding to investments in technical infrastructure, putting priorities in developing technology and high quality products complying with high standards.

Imexpharm usually organizes meetings or implements other methods to listen to the Shareholders opinions and suggestions about operations and improvements of the Company as well as address Shareholders'/Investors' concerns about the Company's businesses in particular and other activities of Imexpharm in general.

4. Rights and Obligations of Shareholders

Shareholders have rights to be informed about business performance of Imexpharm and other rights such as: receive dividend, attend meetings of the General Meeting of Shareholders, transfer shares (except cases having agreements with Imexpharm or others regulated by laws) and other rights stipulated by laws.

Shareholders are responsible for keeping Imexpharm' image, not using the Company's image for private purposes that are harmful or may be risky to general benefits of Imexpharm.

Once being provided internal information of Imexpharm, Shareholders are responsible for keep this information confidential as Imexpharm does not disclose externally and, Shareholders are not allowed to disclose this information.

5. Conflicts and disputes resolutions

In case that there is a conflict or dispute between Imexpharm and Shareholder or a group of Shareholders; or among Shareholders, which is related to Imexpharm operations; Imexpharm shall actively solve this conflict or dispute in harmonious and goodwill principle, organize a discussion and negotiate to share opinion in mutual respect manner among the parties to concur in the final solutions based on respecting legal benefits of the Parties and aiming to developments of the Company.

Article 5: Imexpharm employees

1. Commitment of Imexpharm

Imexpharm commits to create friendly, fair and humanity working environment to push the creativity and enthusiasm of Imexpharm employees. Imexpharm leaderships always listen and communicate with Employees regularly to improve working environment as well as living standards of each Imexpharm member.

Imexpharm commits to treat fairly for all Employees, not have gender discrimination in order to create good conditions being suitable for physical health of Employees to develop their career path and engage in Imexpharm.

Imexpharm pledges to comply with Labor Laws, regulations on employ labor, agreements and contracts signed with the Employees. Training for employees is followed Laws. Imexpharm commits to achieve all standards regulated by law for female employees, people with disability, elder people. Imexpharm does not keep original documents of employees and coerce in any illegal form to assure implementation of labor contract. Imexpharm complies with laws, the Company's regulations in dealing with disciplines in regard to labor.

Imexpharm commits to create opportunities and cooperate with Employees being eligible to retire but having sufficient health and intellectual to work and dedicate to Imexpharm.

Imexpharm commits to not use labors who are children or adolescence.

Imexpharm commits to build labor norms being suitable with the Company's circumstances and complied with laws. Imexpharm builds salary range in transparent way within the enterprise and in accordance with laws. Regulations on working hours are established based on economic condition, habits of each region and followed the special requirements of scopes of works.

Imexpharm builds competitive salary and bonus scheme followed the corporate culture. Imexpharm commits to pay salaries fully and timely for all employees working at Imexpharm; pay overtime wages as regulated by laws. Imexpharm commits to pay compulsory insurances provided by laws.

Imexpharm pledges to fully comply with Labor Laws on employees working in toxic environment and pay compensations as regulated. Imexpharm fulfills or instructs Employees to fulfill all labor policies such as: quit jobs, unemployment, loose jobs... in accordance with Laws.

2. Imexpharm Responsibilities

Imexpharm is responsible to build a safe, standard working environment for employees to be secured to work.

Imexpharm is in charge of making policies and scheme to train and develop employees to improve their competences in order to serve for Imexpharm.

Imexpharm takes responsibility to hold meetings or apply other suitable methods to help the Board of Management communicate with Employees to boost transparency and democracy within the Company.

Imexpharm shall periodically audit policies implementation on labor issues to have appropriate adjustment being appropriate with the Company circumstances and in compliance with laws.

3. Imexpharm Employees Code of Conduct

Imexpharm employees are not allowed to hold or participate in any illegal activities or have illegal action in any form.

Imexpharm employees do not give and receive value things illegally to gain private benefits, or have any corruption or collusion for bribery.

Imexpharm employees are prohibited to use the Company's image and credibility to profit themselves.

Imexpharm employees are responsible for keeping the Company's image and credibility; protecting the Company's assets; don't have any action that is harmful or may be risky to the Company's assets. Imexpharm employees are not allowed to cooperate or collude with a direct or indirect third party to take action damaging the Company's benefits.

Imexpharm employees must comply with confidential policies of the Company. Imexpharm employees are not allowed to publish Imexpharm information except being approved by the Board

of Management. All messages related to the Company's operations must be disclosed by "Official person to disclose information" who is nominated by the Company leaderships.

a) Behavior of employees in the Company

Imexpharm employees must have friendly and harmonious behavior with colleagues and treat co-workers with fair, respectful and helpful manners as well as not discriminate origin, gender and religions of other employees.

Imexpharm employees strongly disagree with violence, abuses and harassment at the work place and; dedicate to fight against actions violating rights and dignity of Employees.

When finding an abnormal behavior of colleague that can lead to a negative influence to work place or be risky to Imexpharm's image and credibility; Imexpharm employees are responsible for presenting such an event to the direct manager or Human Resources and Administration department or Legal department.

b) Communication with Partners, Customers and other external partners

Imexpharm employees must have diligent, respectful and cooperative attitudes; do not use violence or support violence in dealing with Customer outside the company in any circumstance.

Imexpharm employees must not collude with Partners, Customers to profit themselves no matter what this activity influences or has no impact to the Company's image. Such wrong behavior shall be considered to be punished suitably.

Imexpharm employees are not allowed to give, promise to give, suggest to give or give permission to other persons to give or receive gifts, value objects from external persons if these activities affect adversely to benefits, credibility and image of Imexpharm.

Once Imexpharm's employees find an abnormal activity of a colleague or a Partner, a Customer, or an external person such as: fraudulent, corruptions, give and receive value objects in order to profit themselves or damage to credibility, image and brand of Imexpharm, such employees have to report to the Imexpharm Board of Management or the Legal department to have appropriate resolutions. In case that the employees are concerned about their evaluation, they shall present such problem to their direct manager.

Article 6: Local Communities

1. Imexpharm Commitments

Imexpharm commits to comply with laws on corporation responsibilities for local communities.

Imexpharm commits to accompany with local authorities in building and developing the community via the startup programs and improvement of business environment to aim to sustainable development.

Imexpharm pledges to create good conditions for education, and cooperate with local authorities in many aspects such as promoting education and talents programs.

Imexpharm is active in assigning employees to attend seminars and conferences held by Ministries to boost general developments of Vietnam enterprises.

2. Imexpharm responsibilities

- Imexpharm provides sufficiently reports as well as takes full responsibility to pay taxes timely and sufficiently as regulated by laws.

- Imexpharm commits to build development programs for products manufactured by the Company in order to accompany with local communities to improve living standard for residences.

- Imexpharm actively collaborate with local authorities and relevant Ministries in dealing with corporate issues in local communities as regulated by laws.

V. ORGANIZATION OF IMPLEMENTATION

Imexpharm commits that this Code of Conduct is disseminated to all Imexpharm employees and they fully understand their responsibility of preventing frauds by reporting such kind of faults or potential risks to their direct manager to have appropriate solutions.

Imexpharm policy shall protect Imexpharm employees having reports of faults under this Code of Conduct.

All actions that violate this Code of Conduct will be considered to punish based on the level of faults. Besides, person violating this Code of Conduct may take civil or penal responsibility depending on the level of violence regulated by laws.

Dated 30 March 2020

(Signed)

Mr. Nguyen Quoc Dinh

The Chairman of the BODs