



No: 315/QD-XPHC

Ha Noi, June 19th, 2026

DECISION

On the sanctioning of administrative violations

THE CHIEF INSPECTOR OF THE STATE SECURITIES COMMISSION

CÔNG TY
CỔ PHẦN
PHÁT
TRIỂN
NHÀ BÀ
RIÀ-VŨNG
TÀU

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Pursuant to Article 57, Article 68, Article 70, Article 78, and Article 85 of the
Law on Handling of Administrative Violations No. 15/2012/QH13, amended and
supplemented by Law No. 67/2020/QH14 and Law No. 88/2025/QH15;

Pursuant to Decree No. 118/2021/ND-CP dated December 23, 2021 of the
Government detailing a number of articles and measures to implement the Law on
Handling of Administrative Violations, amended and supplemented by Decree No.
68/2025/ND-CP and Decree No. 190/2025/ND-CP;

Pursuant to Decree No. 189/2025/ND-CP dated July 1, 2025 of the Government
detailing the Law on Handling of Administrative Violations regarding the competence
to sanction administrative violations;

Pursuant to Decree No. 156/2020/ND-CP dated December 31, 2020 of the
Government stipulating the sanctioning of administrative violations in the field of
securities and the securities market (Decree No. 156/2020/ND-CP), amended and
supplemented by Decree No. 128/2021/ND-CP and Decree No. 306/2025/ND-CP;

Pursuant to the Administrative Violation Minutes No: 216/BB-VP HC established
on June 11, 2026;

Pursuant to Decision No.: 01/QD-GQXP dated January 5, 2026 of the Chief
Inspector of the State Securities Commission on the delegation of authority to sanction
administrative violations.

DECIDES

Article 1.

1. To sanction administrative violations against the organization named below:

Name of organization: Ba Ria - Vung Tau House Development Joint Stock
Company (the Company)

Head office address: Floor 03, Hodeco Plaza Building, 36 Nguyen Thai Hoc,
Tam Thang Ward, Ho Chi Minh City.

Enterprise registration certificate number, enterprise code: 3500444601; date of
issue: December 28, 2001 (first time); December 11, 2025 (33rd amendment); place of
issue: Department of Finance of Ho Chi Minh City.

Legal representative: Doan Huu Thuan

Gender: Male

Title: Chairman of the Board of Directors.

2. Having committed the following administrative violations:



- Violation of regulations on information disclosure deadlines (The Company delayed information disclosure (ID) by 15 days or more compared to regulations on the ID system of the State Securities Commission and on the website of the Ho Chi Minh City Stock Exchange (HOSE) for the Documents of the 2026 Annual General Meeting of Shareholders (AGM) (ID deadline: April 3, 2026) and the 2025 Annual Report (ID deadline: April 20, 2026); The Company disclosed information after the prescribed deadline on the specialized corporate bond information page of the Hanoi Stock Exchange (HNX) regarding documents on the payment of principal and interest for bond HDCH2224002 at the maturity date (December 30, 2024) (ID deadline: January 4, 2025, date the Company submitted ID to HNX: March 7, 2025)).

- Failure to report information required by law (The Company failed to report the bond issuance plan (codes HDC12501 and HDC12502) attached to the Board of Directors' Resolution No. 83/NQ-PTN dated August 18, 2025 at the nearest AGM (the 2025 Extraordinary AGM held on September 30, 2025)).

- Disclosure of incomplete information as required by law (According to the reviewed separate semi-annual financial statements (FS) for 2023, 2024, 2025; the audited separate FS for 2023, 2024, 2025 and documents provided by the Company, the Company had transactions with related parties which are subsidiaries (HODECO Concrete & Construction JSC; HODECO Construction - Real Estate JSC; Hodeco Real Estate Management and Services Co.,Ltd.) and associate companies (HODECO Investment and Construction JSC; Thua Thien Hue Construction JSC; Dai Duong Vung Tau Entertainment Construction Investment JSC). However, the Company did not disclose the value of transactions with these related parties in the Corporate Governance Reports for the first 6 months of 2023, 2024, 2025 and the years 2023, 2024, 2025).

3. Stipulated at:

- Point b, Clause 4, Article 42 of Decree No. 156/2020/ND-CP amended and supplemented according to Clause 16, Article 1 of Decree No. 306/2025/ND-CP.

- Clause 3, Article 43 of Decree No. 156/2020/ND-CP amended and supplemented according to Point a, Clause 34, Article 1 of Decree No. 128/2021/ND-CP.

- Point a, Clause 3, Article 42 of Decree No. 156/2020/ND-CP amended and supplemented according to Clause 16, Article 1 of Decree No. 306/2025/ND-CP.

4. Aggravating circumstances: Committing administrative violations multiple times, stipulated at Point b, Clause 1, Article 10 of the Law on Handling of Administrative Violations for the act of Violating regulations on information disclosure deadlines and the act of Disclosing incomplete information as required by law.

5. Mitigating circumstances: None.

6. Being subject to the following forms of sanction and remedial measures:

a) Principal sanction: Fine. Specifically:

- Fine of 92,500,000 VND (Ninety-two million five hundred thousand dong) for the act of Violating regulations on information disclosure deadlines;

- Fine of 85,000,000 VND (Eighty-five million dong) for the act of Failure to report information required by law;



- Fine of 65,000,000 VND (Sixty-five million dong) for the act of Disclosing incomplete information as required by law;

- Total fine amount for the Company is: 242,500,000 VND (Two hundred forty-two million five hundred thousand dongs).

b) Additional sanction: None.

c) Remedial measures: None.

Article 2. This Decision takes effect from the date of signing.

Article 3. This Decision is:

1. Assigned to Mr. Doan Huu Thuan, the legal representative of the sanctioned organization named in Article 1 of this Decision, for execution.

Ba Ria - Vung Tau House Development Joint Stock Company must strictly comply with this Sanctioning Decision. If Ba Ria - Vung Tau House Development Joint Stock Company fails to voluntarily comply within the time limit, it will be subject to enforcement according to the provisions of law, and for each day of late payment of the fine, the violating individual or organization must pay an additional 0.05% calculated on the total unpaid fine amount.

Ba Ria - Vung Tau House Development Joint Stock Company must pay the fine at the State Treasury Area I, address: No. 18 Giai Phong Street, Kim Lien Ward, Hanoi, or transfer the fine to account number: 7111 of the State Treasury Area I within 10 days from the date of receiving this Decision.

Ba Ria - Vung Tau House Development Joint Stock Company has the right to file a complaint or initiate an administrative lawsuit against this Decision in accordance with the law.

2. Sent to the State Treasury Area I to collect the fine.

3. Sent to Mr. Nguyen Kim Phuoc - Inspector, State Securities Inspectorate to organize the implementation.

Recipients:

- As Article 3;
- Chairman (for reporting);
- Chief Inspector (for reporting);
- Public Company Supervision Department (for information);
- HNX (for information);
- HOSE (for information);
- Filed: Clerical, Records (106).

**FOR THE CHIEF INSPECTOR
DEPUTY CHIEF INSPECTOR**

(Signed and sealed)

Nguyen Thi Hong Nhung