

FIGHTING AGAINST FORCED AND CHILD LABOUR IN SUPPLY CHAINS

VinFast Auto Canada Inc. | Annual Report, 2025

INTRODUCTION

This report (“**Report**”) is submitted by VinFast Auto Canada Inc. (“**VinFast Canada**”) pursuant to its reporting requirements under Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (S.C. 2023, c. 9) (the “**Act**”). The Report outlines the measures taken over the course of the financial year ended December 31, 2024 (“**FY2024**”), to address **forced labour** and **child labour** in VinFast Canada’s activities and supply chain, along with the other requirements under the Act.

As defined under the Act, **child labour** means labour or services provided or offered to be provided by persons under the age of 18 years and that (i) are provided or offered to be provided in Canada under circumstances that are contrary to the laws applicable in Canada; (ii) are provided or offered to be provided under circumstances that are mentally, physically, socially or morally dangerous to them; (iii) interfere with their schooling by depriving them of the opportunity to attend school, obliging them to leave school prematurely or requiring them to attempt to combine school attendance with excessively long and heavy work; or (iv) constitute the worst forms of child labour as defined in article 3 of the Worst Forms of Child Labour Convention, 1999, adopted at Geneva on June 17, 1999. **Forced labour** means labour or service provided or offered to be provided by a person under circumstances that (i) could reasonably be expected to cause the person to believe their safety or the safety of a person known to them would be threatened if they failed to provide or offer to provide the labour or service; or (ii) constitute forced or compulsory labour as defined in article 2 of the Forced Labour Convention, 1930, adopted in Geneva on June 28, 1930.

VinFast Canada is part of the VinFast group of companies controlled by VinFast Trading and Production Joint Stock Corporation (“**VinFast JSC**”), a Vietnam-based company and the principal manufacturer and producer of VinFast vehicles and parts exported around the world, including to Canada. Both companies fall under the broader umbrella of Vingroup Joint Stock Company (“**Vingroup JSC**”), one of the leading private conglomerates of Vietnam which operates across multiple sectors and industries, including real estate development, travel and hospitality, education, retail, healthcare, green technology, and the motorcycle and automotive industry. As a subsidiary of and importer of goods manufactured and produced by VinFast JSC, VinFast Canada benefits from the measures VinFast JSC has in place to address forced and child labour in its supply chain. Those measures are outlined in this Report.

This year’s report will provide updates on the activities reported on in 2024, and each subsequent annual report will continue to chronicle updates relative to VinFast’s commitment to fighting against forced and child labour.

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See the VinFast story here: vinfastauto.ca/en/story.

For more information about Vingroup, visit vingroup.net/en/about.

1. STEPS TAKEN TO PREVENT AND REDUCE THE RISKS OF FORCED AND CHILD LABOUR

VinFast remains committed to contributing to the fight against forced and child labour, through concrete and purpose-driven actions aimed at preventing and reducing the risk that forced or child labour be used at any step of the production of VinFast vehicles, parts, and services. The company remains committed to upholding high ethical standards and to respecting the human rights and dignity of all people. VinFast believes in and supports the mission of improving the lives of people as they innovate and strive toward building a portfolio of high-quality products and services.

Over the course of 2024, VinFast Canada continued to benefit from the existing structure in place and other measures undertaken by VinFast JSC over the course of 2024, to prevent and reduce the risks of forced and child labour in the VinFast supply chain.

Details of the existing structure were reported last year, in the VinFast 2024 Annual Report on the Fight Against Forced and Child Labour in Supply Chains, which notably included:

- The VinFast JSC Supplier Code of Conduct, which speaks to the VinFast standards suppliers must observe when doing business with the company, and which notably mentions the avoidance of any form of force or child labour. VinFast JSC continues to require all suppliers to sign the Supplier Code of Conduct.
- The VinFast JSC Supplier Quality Manual, which incorporates the Supplier Code of Conduct and makes compliance with it an element in the assessment of a supplier's overall quality rating.

Measures undertaken by VinFast JSC over the course of 2024 included:

- The implementation of new policies and procedures, such as the VinFast Human Rights Policy, the VinFast Sustainable Sourcing Policy, the VinFast Enterprise Risk Management Policy, and the VinFast Potential Supplier Assessment Procedure.
- Updates to existing policies and processes, such as the VinFast Speak-up Policy, the VinFast Supplier Code of Conduct, and the Potential Supplier Assessment Questionnaire.
- Engaging a global consulting firm to assess and report on the degree of implementation of recognized responsible supply chain principles at VinFast, with a view to deepening their implementation at VinFast. The assessment included criteria pertaining to forced and child labour.
- Continued training provided to all VinFast JSC staff on the VinFast Code of Conduct and company compliance policies.

VinFast JSC continued its efforts through the start of 2025, and has taken the following additional measures to date:

1. Developing the VinFast Responsible Supply Chain Framework policy, which will include criteria related to forced and child labour.
2. Developing a roadmap to implement the recommendations retained from the global consulting firm's report on responsible supply chain criteria at VinFast.
3. More extensive supply chain mapping efforts.

VinFast Canada is a beneficiary of the above noted measures. In addition, it maintains its own internal controls and processes to ensure all VinFast Canada employees are recruited on a voluntary basis and meet the legal age of majority in their jurisdiction of reference.

2. STRUCTURE, ACTIVITIES, AND SUPPLY CHAIN

VINFAST'S CORPORATE STRUCTURE AND ACTIVITIES

VinFast Canada is a corporation legally incorporated and operating under the laws of British Columbia, Canada. VinFast Canada primary place of business is located at 80 Tiverton Court in Markham, Ontario. VinFast Canada employed approximately 247 people in 2024, and it is the Canadian importer and seller of VinFast vehicles, parts, and accessories in Canada. In 2024, it had showroom locations in the provinces of British Columbia, Ontario, and Quebec, and operated under a direct-to-consumer model, meaning all showroom locations were owned and operated by VinFast Canada, which sold the vehicles it imported from VinFast JSC directly to consumers in Canada.

VinFast Canada is a wholly owned subsidiary of **Vingroup Investment Vietnam Joint Stock Company**, a Vietnamese joint stock company engaged in the support of and investment in start-up businesses. It has a registered office and principal place of business located in Hanoi City, Vietnam. Vingroup Investment Vietnam Joint Stock Company does not manufacture, distribute, or export products to Canada. VinFast JSC is the principal manufacturer of VinFast vehicles and parts imported into Canada and sold by VinFast Canada.

VinFast JSC controls both Vingroup Investment Vietnam Joint Stock Company and (indirectly) VinFast Canada. It is a corporation legally incorporated and operating under the laws of Vietnam in 2017. Its registered office and principal place of business is in Hai Phong City, Vietnam. VinFast JSC is the entity that manufactures, produces, and exports VinFast electric vehicles to markets around the world, including Canada. It operates a state-of-the-art automotive manufacturing complex in Hai Phong that boasts up to 90% of manufacturing automation and had an annual production capacity (i.e. maximum number of vehicles that can be constantly manufactured in a year with additional shifts per day throughout the year) of up to 300,000 units in its first phase. Since its inception in 2017, it converted into a fully EV manufacturer in 2022, and has delivered seven EV models to customers in Vietnam to date: VF e34, VF 3, VF 5, VF 6, VF 7, VF 8, and VF 9. VinFast recently crossed an important milestone on the journey to becoming a recognized global EV brand with the first VF 8 EVs exported to North America in early 2023, and began delivering the VF 9 all-electric seven-passenger SUV to Canadian customers in November 2024.

Both VinFast Canada and VinFast JSC fall under the broader umbrella of **VinFast Auto Ltd.**, the parent company and publicly traded entity listed on the NASDAQ.

VinFast Canada and VinFast JSC share the same **mission**: to create a more sustainable future for everyone. They seek to accomplish this through a shared vision of driving the movement of the global smart electric vehicle revolution.

SUPPLY CHAINS

As reported last year, VinFast vehicles and most spare parts distributed in the Canadian market are imported from VinFast JSC. VinFast JSC's suppliers therefore form part of VinFast Canada's overall supplier network. The composition of the supplier network for 2024 was as follows:

Type of Goods / Services	Primary Source Countries/Regions	Secondary Source Countries/Regions
Direct Parts, Materials, Manufacturing & Other Services	China Vietnam India Germany Thailand Turkey United States	Europe Western Asia Southern Asia Southeast Asia Australia Mexico
Indirect Parts & Materials (e.g. tools, machinery, paint)	Vietnam China Thailand Korea	Germany Italy Singapore Other EU
Indirect Manufacturing Services	Vietnam Thailand China United States Singapore	-
Information Technology and Engineering Services	Vietnam Singapore United States India	Austria Australia Belgium China Finland France Germany United Kingdom Hong Kong Italy Japan Middle East Luxembourg Malaysia Mexico South Africa Spain Taiwan Thailand Turkey UAE

VinFast Canada also imports certain other goods from suppliers outside the VinFast group of companies – namely electric vehicle charging service equipment. Those suppliers are located in Canada, Vietnam, and the United States with goods produced originating from Canada, Vietnam, and Mexico.

3. POLICIES AND DUE DILIGENCE PROCESSES IN RELATION TO FORCED AND CHILD LABOUR

VinFast made several changes to its policies and processes related to forced and child labour over the course of 2024. This section provides details about those policies and processes, including what has changed since last year's report.

There are five core policies which set the overarching framework for VinFast's commitment to upholding high ethical standards across its operations and supply chain:

1. VinFast Code of Conduct
2. Global Speak-Up Policy
3. VinFast Human Rights Policy
4. VinFast Sustainable Sourcing Policy
5. Supplier Code of Conduct

Several subsidiary policies detail various other mechanisms VinFast has in place to accomplish this in practice. Details on these are also included below.

Most of the policies listed here are applicable to all VinFast JSC subsidiaries, including VinFast Canada. Even where this is not the case, VinFast Canada still benefits from the policies and processes put in place by VinFast JSC since as mentioned, VinFast Canada imports all VinFast vehicles and most VinFast parts as finished products, directly from VinFast JSC.

In addition, VinFast Canada also maintains its own controls and processes to ensure that all VinFast Canada employees are recruited on a voluntary basis and meet the legal age of majority in their jurisdiction of reference.

VINFAST CODE OF CONDUCT

The VinFast Code of Conduct remains unchanged since last year's report. It applies to all VinFast employees, subcontractors, vendors and suppliers, providing guidelines and standards for ethical behavior and decision-making within the company and establishing the company's values, responsibilities, and commitments to ethical practices. It sets expectations for how employees and third parties must conduct themselves relative to these standards, and contains a section on human rights, which notably highlights the company's commitment to fighting against human rights abuses, including forced and child labour. It encourages employees to speak up if they have concerns about issues that appear inconsistent with the Code, highlighting the company's speak-up culture and its global Speak-Up policy. It includes information about the communication channels through which these concerns can be reported anonymously.

GLOBAL SPEAK-UP POLICY

The VinFast Global Speak-Up Policy was updated towards the end of 2024. It applies to all VinFast employees and interested third parties globally, including directors, officers, contractors, suppliers and

other related parties, in all regions and territories in which VinFast operates. It invites open and anonymous good faith reporting of any issues that appear inconsistent with the company's Code of Conduct, other company policies, violation of applicable laws, or human rights violations generally, and provides a concrete procedure on how to do so in a safe, anonymous, and retaliatory-free manner. It also sets out VinFast's standard approach for receiving, screening, and processing any such reports. The updates made in late 2024 were to provide more explanations about certain types of reportable conduct, and to further define the roles and responsibilities of the parties related to the policy.

VinFast Canada periodically verifies whether any reports regarding forced or child labour have been made. To date, since the policy's adoption in 2022, no such reports have been recorded.

VINFAST HUMAN RIGHTS POLICY & SUSTAINABLE SOURCING POLICY

VinFast adopted two new policies towards the end of 2024: a Human Rights Policy and a Sustainable Sourcing Policy. The Human Rights Policy complements the VinFast Code of Conduct and the company's overall commitment to upholding human rights globally, and formalizes this commitment into a comprehensive policy. The policy establishes the company's aim to minimally adhere with internationally recognized human rights standards, such as the International Bill of Rights, the International Labour Organization's Declaration on the Fundamental Principles and Rights at Work, and the United Nations Guiding Principles on Business and Human Rights. The policy explicitly condones forced labour, child labour, and all forms of modern slavery.

The Sustainable Sourcing Policy integrates and replaces the VinFast Conflict Minerals Policy, which was detailed in last year's report. The scope of this new policy is broader, incorporating sourcing activities of all kinds. It provides guidelines for suppliers to align with VinFast's commitment to sustainable, responsible and ethical sourcing, highlighting its commitment to preventing various practices from entering its supply chain, including forced and child labour, and outlining the company's expectations of its suppliers for supply chain integrity through concrete actions such as traceability, climate risk management, anti-corruption prevention, grievance and remediation measures where appropriate, and conducting due diligence.

VINFAST SUPPLIER CODE OF CONDUCT

The VinFast Supplier Code of Conduct was adopted in August 2023 and updated in late 2024. The revised code applies to all VinFast subsidiaries as well as their suppliers, and sets out the company's minimum standards and requirements suppliers must follow in order to engage and do business with VinFast. Like the previous version of the policy, its intent is to encourage responsible business conduct, adherence to applicable ethical, legal, environmental, and business standards, and mitigate adverse effects on human rights, labour rights, environmental protection standards, and anti-corruption standards. It holds suppliers accountable for compliance with VinFast's requirements along with all applicable laws and regulations. Those requirements notably include a requirement to comply with applicable laws to ensure the safety and fundamental rights of individuals, to not be associated with child labour, human trafficking or any type of exploitation, and to not undertake any practices that are in violation of human rights and international humanitarian laws.

Suppliers are required to report any deviations or violations of the Supplier Code to VinFast, and the code invites anonymous reporting in this regard. In early 2024, VinFast JSC began requiring all its suppliers to sign the Supplier Code, a practice that continued through 2024 and which the company intends to continue for the foreseeable future. Signing the Supplier Code signifies a supplier's commitment to respecting the

code. It also confirms their understanding of the measures outlined in the code, notably those allowing VinFast to verify compliance through auditing activities and to undertake actions to rectify any observed nonconformities. In some cases, if necessary, remedial action plans issued against a supplier can be made contractually binding, and continuing a business relationship with VinFast can be made conditional upon successful completion of such a plan.

VINFAST SUPPLIER QUALITY MANUAL

The Supplier Quality Manual, developed and implemented in 2018 and updated in March 2024, incorporates the Supplier Code of Conduct and reiterates VinFast's requirements relative to human rights and working conditions. It sets out VinFast's process for vetting new suppliers and for managing and monitoring supplier quality and performance throughout the supplier relationship. Suppliers in scope are notably required to ensure compliance, both directly and throughout their own supply chains, with all applicable laws and regulations. Potential suppliers also undergo vetting through VinFast's Potential Supplier Assessment ("PSA") questionnaire and process. All suppliers in scope must complete the PSA and undergo an on-site inspection where relevant, before becoming a VinFast supplier. The results of the PSA contribute to VinFast's supplier selection decisions.

VINFAST SUPPLIER ASSESSMENT QUESTIONNAIRES AND PROCESSES

VinFast continued using its Potential Supplier Assessment questionnaire and process ("PSA process") through 2024, which was developed in 2023 and formally adopted in March 2024. All suppliers in scope must complete the PSA and undergo an on-site inspection where relevant, before becoming a VinFast supplier. The questionnaire includes questions designed to gauge the level with which suppliers are able to comply with various criteria, including compliance with labour laws and prohibitions on forced and child labour. Suppliers must receive a satisfactory risk rating before they can be engaged by VinFast.

VinFast Canada also has its own Supplier Screening Questionnaire for its own direct suppliers, which it bolstered in 2024 to include assessment criteria around forced and child labour.

In early 2025, VinFast JSC began working on an assessment procedure that would apply specifically to environmental, social and governance risks (the "ESG assessment process"). The process was formally adopted in April 2025 and is intended to be complementary to, but separate from, the PSA process. The process includes a questionnaire and a risk-rating scheme, which include criteria on forced and child labour as well as a mechanism to issue corrective actions to suppliers for any observed non-compliances or areas in which improvements could be made. This new process notably integrates the US Department of Labor's published [*List of Goods Produced by Child Labor or Forced Labor*](#), calling a heightened degree of scrutiny to these areas. Pre-screening of potential new suppliers is required based on the list, and if any risk areas are identified, the supplier will undergo a full ESG assessment. This new process is intended as a mechanism that will allow VinFast to better identify, assess, and manage ESG-related risks.

INDUSTRY STATEMENT AGAINST CHILD LABOUR

VinFast also remains a member of the Automotive Industry Action Group, which issued a [*statement*](#) against child labour on behalf of all member companies.

The statement (reproduced below) reaffirms the members' position and industry standard on child labour.

“In light of recent legislative changes to state labor laws in the United States, AIAG and its member companies are reaffirming the industry’s position on child labor and young workers. As stated in the Automotive Industry Guiding Principles to Enhance Sustainability Performance in the Supply Chain (2022), also referred to as the Guiding Principles, the industry standard for global legislative compliance:

Child Labor/Labour and Young Workers: *Suppliers must observe the minimum employment age in their business activities and throughout their supply chain in accordance with the ILO Minimum Age Convention and shall ensure that child labor/labour is not tolerated in any form.”*

For more information, visit: aiag.org/corporate-responsibility/forced-labor-human-rights

4. ASSESSING OUR RISK EXPOSURE, AND STEPS TAKEN TO MANAGE THAT RISK

VinFast Canada and its principal supplier VinFast JSC are still in early stages of maturity regarding the implementation of more robust controls for assessing the parts of their business and supply chains which may carry a risk of forced or child labour. Nevertheless, a few important strides have been made since last year’s report, signifying progress in this area:

1. VinFast began more extensive supply chain mapping efforts with a view to improving its overall management of supplier relationships and the quality of its supplier network.
2. VinFast continued requiring that all suppliers sign its Supplier Code of Conduct through 2024 and 2025, keeping track of the status of supplier signatures. This gives some indication of the areas of its supply chain which may carry a greater risk of forced or child labour.
3. VinFast began applying the new ESG assessment process in early 2025, which will yield greater insights into any possible issues with forced and child labour in its supply chain, amongst other things.
4. In late 2024, VinFast engaged a global consulting firm to assess and report on the degree of implementation of recognized responsible supply chain principles at VinFast, with a view to deepening their implementation. The assessment made a number of recommendations, which VinFast is still reviewing as it devises a roadmap for acting on priority areas. Concurrently, it also began developing a Responsible Supply Chain Framework policy, a significant undertaking which it intends on completing in the coming years.

5. TRAINING AND AWARENESS ACTIVITIES

VinFast JSC maintains a comprehensive in-house training program that all employees, including management-level staff, are required to undergo. The program includes training on:

- The VinFast Code of Conduct
- Compliance policies
- Occupational Health and Safety

Training modules can be from 30 minutes to 2 hours in duration and typically include quizzes and tests to ensure knowledge has been properly assimilated.

Forced and child labour is a topic that is viewed indirectly as part of these trainings.

VinFast Canada has not provided any training to its employees on forced and child labour as yet.

6. ASSESSING OUR EFFECTIVENESS

The measures and controls in place in 2024 around forced and child labour appear to be supporting the initiative. For instance, there have been no reports of non-compliances with applicable labour laws related to forced and child labour, and no reports of any issues related to same at JSC. In addition, no reports have been made through applicable speak-up / whistleblowing channels relative to a VinFast supplier.

The measures in place to assess our effectiveness remain in early stages of maturity. Progress has been made since the time of reporting last year, as detailed in this report, and VinFast intends to continue pursuing its efforts in this regard as well as exploring other opportunities to develop and implement more tangible metrics and control mechanisms for tracking and monitoring to better assess both companies' overall effectiveness in fighting against forced and child labour in their supply chains.

Measures taken to remediate any forced or child labour

No instances of forced or child labour have been identified in our activities or supply chain over FY2024. Therefore, no remedial measures have been taken.

Measures taken to remediate loss of income to the most vulnerable families

No instances of forced or child labour have been identified in our activities or supply chain over FY2024. Therefore, no remedial measures have been necessary in this regard.

APPROVAL AND ATTESTATION

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

I have the authority to bind VinFast Auto Canada Inc.:



Huong Giang Nguyen
Market CEO and Director, VinFast Auto Canada Inc.

Date signed: May 30, 2025

CONTACT US

If you have any inquiries concerning this report, please contact legal-ca@vinfastauto.com.

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Forced and Child Labour Report (Federal - Canada) - May 2025 FINAL (ENG)

Final Audit Report

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