CÔNG TY CP BẤT ĐỘNG SẢN DU LỊCH NINH VÂN BAY
NINH VAN BAY TRAVEL REAL ESTATE JOINT STOCK COMPANY

CỘNG HÒA XÃ HỘI CHỦ NGHĨA VIỆT NAM
Độc lập - Tự do - Hạnh phúc
THE SOCIALIST REPUBLIC OF VIETNAM
Independence - Freedom - Happiness

Số: 45/2026NVB-CBTT
No.: 45/2026NVB-CBTT

Hà Nội, ngày 15 tháng 09 năm 2026
Hanoi, September 15, 2026

CÔNG BỐ THÔNG TIN BẤT THƯỜNG
EXTRAORDINARY INFORMATION DISCLOSURE

Kính gửi: Sở Giao dịch Chứng khoán Thành phố Hồ Chí Minh
To: Ho Chi Minh Stock Exchange

1. Tên tổ chức: Công ty Cổ phần Bất động sản Du lịch Ninh Vân Bay
1. Name of organization: Ninh Van Bay Travel Real Estate Joint Stock Company
- Mã chứng khoán: NVT
- *Stock code: NVT*
- Địa chỉ: Tầng 19, tòa nhà Vinaconex, số 34 Phố Láng Hạ, phường Láng, Thành phố Hà Nội.
- *Address:* 19th Floor, Vinaconex Building, No. 34 Lang Ha Street, Lang Ward, Hanoi, Vietnam
- Điện thoại liên hệ: 02439264950
- *Tel.: 02439264950*
- E-mail: info@ninhvanbay.vn
- *E-mail: info@ninhvanbay.vn*

2. Nội dung thông tin công bố:
2. Contents of disclosure:

Ngày 14/09/2026, Công ty Cổ phần Bất động sản Du lịch Ninh Vân Bay ("Công ty") nhận được Quyết định số 508/QĐ-XPHC ngày 11/09/2026 của Ủy ban Chứng khoán Nhà nước về việc xử phạt vi phạm hành chính trong lĩnh vực chứng khoán và thị trường chứng khoán đối với Công ty.
On September 14, 2026, Ninh Van Bay Travel Real Estate Joint Stock Company (the "Company") received Decision No. 508/QĐ-XPHC dated September 11, 2026 issued by the State Securities Commission of Vietnam on the imposition of administrative penalties on the Company for violations in the securities and securities market sector.

Theo Quyết định số 508/QĐ-XPHC, Công ty bị xử phạt vi phạm hành chính với tổng số tiền là 365.000.000 đồng (Ba trăm sáu mươi lăm triệu đồng), cụ thể như sau:
Pursuant to Decision No. 508/QĐ-XPHC, the Company is subject to administrative fines totaling VND 365,000,000 (three hundred and sixty-five million Vietnamese dong), specifically as follows:

– Phạt tiền 65.000.000 đồng đối với hành vi công bố thông tin không đầy đủ;
A fine of VND 65,000,000 for the act of incomplete information disclosure;

– Phạt tiền 175.000.000 đồng đối với hành vi công bố thông tin sai lệch;

A fine of VND 175,000,000 for the act of disclosing inaccurate information;

– Phạt tiền 125.000.000 đồng đối với hành vi không đảm bảo thành viên Hội đồng quản trị, Ban Kiểm soát, Ủy ban Kiểm toán và Tổng Giám đốc theo nội dung Quyết định.

A fine of VND 125,000,000 for the act relating to the failure to ensure the required composition of the Board of Directors, Board of Supervisors, Audit Committee and General Director, as stated in the Decision.

Công ty thực hiện công bố thông tin về Quyết định số 508/QĐ-XPHC theo quy định của pháp luật về chứng khoán và thị trường chứng khoán.

The Company hereby discloses information regarding Decision No. 508/QĐ-XPHC in accordance with applicable laws and regulations on securities and the securities market.

Quyết định số 508/QĐ-XPHC ngày 11/09/2026 của Ủy ban Chứng khoán Nhà nước được đính kèm theo bản công bố thông tin này.

Decision No. 508/QĐ-XPHC dated September 11, 2026 of the State Securities Commission of Vietnam is attached to this information disclosure.

Chúng tôi xin cam kết các thông tin công bố trên đây là đúng sự thật và hoàn toàn chịu trách nhiệm trước pháp luật về nội dung các thông tin đã công bố.

We hereby certify that the information disclosed above is true and accurate and we take full responsibility before the law for the contents of the disclosed information.

Tài liệu đính kèm:
Quyết định số 508/QĐ-XPHC ngày 11/09/2026 của Ủy ban Chứng khoán Nhà nước.
Attached document:
Decision No. 508/QĐ-XPHC dated September 11, 2026 of the State Securities Commission of Vietnam.

ĐẠI DIỆN TỔ CHỨC
ORGANIZATION REPRESENTATIVE
(Ký, ghi rõ họ tên, chức vụ và đóng dấu)
(Signature, full name, position and seal)

M.S.D.N: 0102051941 - C.T.C.P
CÔNG TY CỔ PHẦN BẤT ĐỘNG SẢN DU LỊCH NINH VÂN BAY
HAI BÀ TRƯNG - TP. HÀ NỘI

TỔNG GIÁM ĐỐC
Trịnh Nguyên Khánh

STATE SECURITIES COMMISSION
STATE SECURITIES INSPECTORATE

No.: 508/QD-XPHC

SOCIALIST REPUBLIC OF VIETNAM
Independence - Freedom - Happiness

Hanoi, 11 September 2026

DECISION

On administrative sanction

CHIEF INSPECTOR OF THE STATE SECURITIES INSPECTORATE

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

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

Pursuant to Government Decree No. 189/2025/ND-CP dated 01 July 2025 detailing the Law on Handling of Administrative Violations regarding competence to impose administrative sanctions;

Pursuant to Government Decree No. 156/2020/ND-CP dated 31 December 2020 on administrative sanctions in the securities and securities market sector (Decree No. 156/2020/ND-CP), as amended and supplemented by Decree No. 128/2021/ND-CP and Decree No. 306/2025/ND-CP;

Pursuant to Administrative Violation Record No. 76/BB-VPHC dated 26 August 2026.

HEREBY DECIDES:

Article 1.

1. To impose administrative sanctions on the following organization:

Name of violating organization: Ninh Van Bay Real Estate Tourism Joint Stock Company (the Company).

Head office: 19th Floor, Vinaconex Building, No. 34 Lang Ha Street, Lang Ward, Hanoi, Vietnam.

Enterprise Registration Certificate / Enterprise ID: 0102051941; first issued on 26 September 2006; issuing authority: Hanoi Department of Planning and Investment (now Hanoi Department of Finance); 20th amendment dated 04 June 2026.

Legal representative: Trinh Nguyen Khanh Gender: Male

Title: Chief Executive Officer.

2. The following administrative violations were committed:

- Disclosure of information with incomplete contents as required by law (the Company made incomplete disclosures in the following documents):

+ Appendices on the List of Related Persons of the Company in the Corporate Governance Reports for the first six months of 2024, year 2024, first six months of 2025, year 2025 and first six months of 2026; the Appendices on the List of Insiders and Related Persons of Insiders in the Corporate Governance Reports for the first six months of 2024 and year 2024 did not present information on Deputy Chief Executive Officer Dang Thi Ngoc Han;

+ The Appendix on the List of Insiders and Related Persons of Insiders in the Corporate Governance Report for the first six months of 2026 did not present information on the Chief Executive Officer, Chief Accountant, Board member Dang Thuy Linh (dismissed from the position of Board member under Resolution No. 01/2026/NQ-DHDCD dated 29 May 2026), and Board member cum Chief Executive Officer Do Quang Hai (dismissed from the position of Board member under Resolution No. 01/2026/NQ-DHDCD dated 29 May 2026 and dismissed from the position of Chief Executive Officer under Resolution No. 04B/2026/HDQT-NQ dated 01 June 2026); nor did it present information on the number of shares held at period end and the percentage of shares held at period end;

+ The Corporate Governance Reports for the first six months of 2024 and year 2024 did not present Board Resolution No. 01A/2024/HDQT-NQ dated 05 January 2024; the reports for the first six months of 2025 and year 2025 did not present Board Resolution No. 01A/2025/HDQT-NQ dated 02 January 2025; the report for the first six months of 2026 did not present Resolution No. 01A/2026/HDQT-NQ dated 08 January 2026 and No. 03A/2026/NVB/NQ-HDQT dated 16 April 2026;

+ Information relating to candidates for the Board of Directors and Supervisory Board, specifically:

(i) In 2024: information relating to candidates for the Board of Directors and Supervisory Board did not include date of birth; employment history; other management positions; and interests related to the Company and its related parties;

(ii) In 2025: information relating to candidates for the Supervisory Board did not include employment history; other management positions; and interests related to the Company and its related parties.

- Disclosure of inaccurate information (the Company disclosed inaccurate information in the following documents):

+ Corporate Governance Report for the first six months of 2026: in Section IV (Executive Management), the Company disclosed Mr. Do Quang Hai as Chief Executive Officer whereas Mr. Trinh Nguyen Khanh had been appointed Chief Executive Officer from 01 June 2026 under Resolution No. 04B/2026/NQ-HDQT;

+ Corporate Governance Reports for 2024, 2025 and the first six months of 2026: in Section VII.7.2 (Transactions between the Company and its related persons, or between the Company and major shareholders, insiders or related persons of insiders), the Company stated "none arose", whereas transactions actually occurred, specifically:

(i) In 2024, transactions with related party Tan An Tourism Development Joint Stock Company (a subsidiary of the Company; Mr. Do Quang Hai - a Board member of NVT and concurrently Chairman of the Board of Tan An; Mr. Trinh Nguyen Khanh - a Board member of NVT and concurrently a Board member of Tan An) amounted to VND 20,793,981; and transactions with Hong Hai Tourism Joint Stock Company (a subsidiary of the Company; Ms. Dang Thuy Linh and Mr. Do Quang Hai - Board members of NVT and concurrently Board members of Hong Hai) amounted to VND 46,770,370 (according to the 2024 audited separate financial statements);

(ii) In 2025, transactions with related party Hong Hai Tourism Joint Stock Company (a subsidiary of the Company; Ms. Dang Thuy Linh and Mr. Do Quang Hai - Board members of the Company and concurrently Board members of Hong Hai) amounted to VND 15,185,185 (according to the 2025 audited separate financial statements);

(iii) In the first six months of 2026, transactions with related party Tan An Tourism Joint Stock Company (a subsidiary of the Company) included other expenses of VND 8,333,334 (according to the Company's separate financial statements for Q2 2026);

+ Audited financial statements for 2024 and 2025: inaccurate disclosure of the indicators "Undistributed profit after tax" and "Provision for impairment of investments in other entities" in the 2024 and 2025 audited financial statements, in the respective amounts of VND 35.34 billion and VND 33.61 billion, due to failure to make a provision for impairment of the investment in subsidiary Da Huong Tourism Investment Company Limited; inaccurate disclosure in Note 10 - Financial investments in the 2025 audited separate financial statements. Specifically, in 2025, Bao Viet Company - an indirect subsidiary of the Company - incurred a loss of VND 9.67 billion; however, Note 10 to the Company's 2025 audited separate financial statements stated that "in 2025, the Company's subsidiaries operated profitably, therefore no provision for investments was made".

- Failure to ensure that members of the Board of Directors, Supervisory Board, Audit Committee and the Chief Executive Officer (Director) satisfy the prescribed standards and conditions (the Company failed to ensure that a Board member satisfied the prescribed standards and conditions: the Company's independent Board member was also Chairman of the Board of NVT Holdings Joint Stock Company, the Company's parent company).

3. Legal provisions applicable:

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

- Clause 6, Article 42 of Decree No. 156/2020/ND-CP, as amended and supplemented by Clause 16, Article 1 of Decree No. 306/2025/ND-CP;

- Point a, Clause 6, Article 15 of Decree No. 156/2020/ND-CP, as amended and supplemented by Clause 7, Article 1 of Decree No. 306/2025/ND-CP.

4. Aggravating circumstances: repeated administrative violations as prescribed at Point b, Clause 1, Article 10 of the Law on Handling of Administrative Violations, with respect to the acts of disclosing information with incomplete contents as required by law and disclosing inaccurate information.

5. Mitigating circumstances: None.

6. The following sanctions and remedial measures are imposed:

a) Principal sanction: Fine.

Specifically:

- A fine of VND 65,000,000 for disclosing information with incomplete contents as required by law (Sixty-five million Vietnamese dong).

- A fine of VND 175,000,000 for disclosing inaccurate information (One hundred and seventy-five million Vietnamese dong).

- A fine of VND 125,000,000 for failing to ensure that members of the Board of Directors, Supervisory Board, Audit Committee and the Chief Executive Officer (Director) satisfy the prescribed standards and conditions (One hundred and twenty-five million Vietnamese dong).

The total fine imposed on the Company is VND 365,000,000 (Three hundred and sixty-five million Vietnamese dong).

b) Additional sanction: None.

c) Remedial measure: The Company is required to cancel the disclosed information or correct the information in respect of the act of disclosing inaccurate information, as prescribed in Clause 6, Article 42 of Decree No. 156/2020/ND-CP, as amended and supplemented by Clause 16, Article 1 of Decree No. 306/2025/ND-CP.

The time limit for implementing the remedial measure and matters directly related to its implementation shall comply with Clauses 1 and 3, Article 51 of Decree No. 156/2020/ND-CP, as amended and supplemented at Point a, Clause 42, Article 1 of Decree No. 128/2021/ND-CP.

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

Article 3. This Decision shall be:

1. Delivered to Mr. Trinh Nguyen Khanh, representative of the sanctioned organization named in Article 1 of this Decision, for compliance.

Ninh Van Bay Real Estate Tourism Joint Stock Company shall strictly comply with this sanctioning Decision. If, after the prescribed time limit, the Company does not voluntarily comply, enforcement measures shall be applied in accordance with law; for each day of late payment, the Company shall additionally pay 0.05% of the outstanding fine amount.

Ninh Van Bay Real Estate Tourism Joint Stock Company shall pay the fine to State Treasury Region I, address: No. 18 Giai Phong Street, Kim Lien Ward, Hanoi, or remit the fine to Account No. 7111 of State Treasury Region I within 10 days from receipt of this Decision.

Ninh Van Bay Real Estate Tourism Joint Stock Company has the right to lodge a complaint or initiate an administrative lawsuit against this Decision in accordance with law.

2. Sent to State Treasury Region I for collection of the fine.

3. Sent to Ms. Nguyen Thi Hong Nhung - Deputy Chief Inspector, State Securities Inspectorate, for implementation.

Recipients:
- As stated in Article 3;
- Chairperson (for reporting);
- Public Company Supervision Department (for information);
- Filed: Office, dossier (07b).

CHIEF INSPECTOR

Pham Thi Thanh Huong

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STATE SECURITIES COMMISSION
STATE SECURITIES INSPECTORATE

SOCIALIST REPUBLIC OF VIETNAM
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No.: [as in original]/TT
Re: Guidance on implementation of the administrative sanctioning Decision

Hanoi, September 2026

To: Ninh Van Bay Real Estate Tourism Joint Stock Company

Pursuant to Administrative Violation Record No. 76/BB-VPHC dated 26 August 2026, the State Securities Inspectorate issued Decision No. 508/QD-XPHC dated 11 September 2026 imposing administrative sanctions in the securities and securities market sector on Ninh Van Bay Real Estate Tourism Joint Stock Company (the Company).

When paying the fine under Decision No. 508/QD-XPHC dated 11 September 2026, the Company is requested to clearly state the following on the payment document:

- Payment of fine under Administrative Sanctioning Decision No. 508/QD-XPHC dated 11 September 2026 of the State Securities Inspectorate;

- Account: 7111 at State Treasury Region I;

- Revenue-collecting authority: Ministry of Finance (revenue authority code: 1082814), chapter: 018, sub-item: 4299.

Within 07 days from the end of the time limit for complying with the principal sanction of a fine, the Company is responsible for sending the fine payment document certified by the State Treasury or bank to the State Securities Inspectorate (address: No. 164 Tran Quang Khai Street, Hoan Kiem, Hanoi) in accordance with Clause 1, Article 52a of Decree No. 156/2020/ND-CP, as amended and supplemented by Clause 44, Article 1 of Decree No. 128/2021/ND-CP; and at the same time sending a fax to (024) 39340739 or a scanned copy by email to thanhtra@ssc.gov.vn as evidence of payment of the fine.

The State Securities Inspectorate hereby notifies the Company for its information and compliance.

Recipients:
- As above;
- Chief Inspector (for reporting);
- Filed: Office, Inspectorate (04b).

FOR THE CHIEF INSPECTOR
DEPUTY CHIEF INSPECTOR

Nguyen Thi Hong Nhung

T.C.P ★ IOI