

For official use

Resolution No. 24/04 of the  
Board meeting of "Sendmn NBFI" LLC ON February 5<sup>th</sup> 2025,  
Attachment 1

**CODE OF CONDUCT OF "SENDMN NBFI" LLC**

**YEAR 2024**

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## Revision history:

Version	Approval date, resolution number	Description of revision	Prepared by	Reviewed by
01			Administrative Human Resources Officer G. Enkhnarar	Executive Director
02		Additional amendments	Administrative Human Resources Officer G. Enkhnarar	Operations Director
03		Additional amendments	Administrative Human Resources Officer G. Enkhnarar	Operations Director
04	2024.02.05 №24/04	Incorporated into the Corporate Governance Code	Lawyer/Secretary of the Board of Directors: Ts.Undrakh	Executive Management

## **CODE OF CONDUCT OF “SEND MN NBFI” LLC**

### **Policy**

All employees of "SendMN NBFI" LLC (hereinafter referred to as the "Company") shall prioritize the company's values, principles to be followed, reputation, and legal interests while working to achieve the company's noble purpose and other business goals and objectives, and shall adhere to this Code of Conduct, which has been developed in accordance with the laws of Mongolia and the company's internal legal documents, in their daily work.

### **Objective**

This Code of Conduct is to establish and enforce the ethical norms that must be followed in the daily business activities of the company's Shareholders, members of the Board of Directors (Board), Executive Management, and all employees.

### **Scope of Application**

- Shareholders, members of the Board, Executive Management, all employees
- Client organizations, suppliers

## **COMPANY'S MISSION, VALUES, AND PRINCIPLES TO BE FOLLOWED**

**MISSION:** To offer the cheapest and fastest solution for all money transfer issues of Mongolian citizens residing around the world.

**VISION:** To become an internationally competitive money transfer company that has contributed to the rapid development of Mongolia.

### **VALUES:**

### **Result:**

- We prioritize finding solutions to improve the quality of our products and services, making decisions quickly and effectively, and delivering them to our customers.
- We plan our work optimally and spend our working hours productively.
- We always learn from our mistakes and seek opportunities for growth and advancement.

### **Responsibility**

- We take ownership and are responsible for all our actions, decisions, and their outcomes.
- We are always innovators and improvers.

- We are consistent and able to complete our assigned tasks on time.

### **Team Mindset**

- We are a positive team that treats each other with equal respect.
- We are a team that listens to one another and gives importance to the content, not the person.
- We are a team that generously praises the success, growth, development, and results of others.

### **PRINCIPLES TO BE FOLLOWED**

- To work within the framework of the laws of Mongolia, the company's charter, and regulations, and to adhere to them in the company's operations.
- To maintain equal and fair relations with clients, partner organizations, and suppliers, and to adhere to the principles of business ethics.
- To adhere to the principles of managing and being managed between the company's management and employees.
- To work with professionalism and responsibility, upholding and protecting the company's reputation.
- To be free from conflicts of interest, corruption, and bribery, and to prevent any illegal activities.
- To ensure the reliability of information security, and to store and protect the company's confidential information in accordance with the law.
- Work to implement policies that support environmentally friendly and sustainable development.

### **ONE. LABOR RELATIONS**

1.1. To create a friendly and respectful relationship that honors the dignity and upholds the legal interests of every employee, to treat every employee equally, and to provide a safe working environment free from discrimination, violence, bullying, intimidation, and slander.

1.2. To treat employees and clients with equal respect regardless of a person's nationality, ethnicity, language, race, age, sex, social origin and status, wealth, occupation, official position, religion, opinion, education, or sexual orientation.

1.3. To adhere to the legislation of Mongolia in labor relations and not to tolerate any illegal actions.

1.4. To dress in a professional manner at the workplace and to adhere to work hours.

## **TWO. HUMAN RIGHTS**

2.1. To respect and uphold the human rights and freedoms specified in the Constitution of Mongolia and international treaties and conventions, and not to tolerate any violation of human rights.

2.2. In labor relations, it is prohibited to directly or indirectly discriminate, restrict rights, or grant advantages to a person based on their nationality, ethnicity, language, race, age, sex, social or marital status, wealth, religion, political or other opinions, trade union membership, health status, pregnancy or maternity status, sexual or gender orientation, expression, disability, or physical appearance.

2.3. In labor relations, workplace harassment, violence, sexual harassment, labor exploitation, forced labor, and the worst forms of child labor will not be tolerated.

## **THREE. SAFETY, HEALTH, AND ENVIRONMENT**

3.1. It is obligatory to comply with and follow the laws of Mongolia, and the company's internal rules, regulations, and instructions related to occupational safety.

3.2. It is strictly forbidden to work at the workplace while under the influence of alcoholic beverages, narcotic drugs, or psychotropic substances.

3.3. It is forbidden to bring firearms, knives, or any weapon-like items specially prepared to cause bodily harm to a person into the workplace.

3.4. Any violation related to occupational safety shall be immediately reported to the relevant employee.

3.5. In the event that a situation arises at the workplace that poses a risk to health and occupational safety, it must be reported and work must be stopped immediately.

3.6. If a health-related illness or complaint arises while performing duties at the workplace, the relevant employee shall be notified immediately, and necessary measures shall be taken to provide primary medical care.

3.7. To adhere to a policy that supports environmentally friendly, sustainable green development at all stages of its business operations, to take measures to reduce and eliminate potential negative impacts on the environment, and to comply with environmental protection laws.

## **FOUR. INFORMATION SECURITY**

4.1. Within the framework of applicable laws and regulations, all news, information and reports concerning the Company's operations shall be furnished in a timely manner—accurately, clearly and objectively—to the Company's shareholders, members of the Board of Directors, executive management, employees, clients and suppliers.

4.2. Employees shall, in accordance with the “Confidentiality Agreement” concluded with the Company, collect, process and use, within the bounds of the law, any information relating to clients, partner organizations, suppliers and the like—and shall ensure its security at all times.

4.3. Company’s confidential information is the property of the Company and, except as provided under the confidentiality agreement executed within the scope of its business activities or as lawfully required by judicial or regulatory authorities, may not be disclosed to any third party.

4.4. The foregoing shall not apply to information that is disclosed by law or by decision of an authorized Company official.

4.5. Employees who are obligated to maintain the confidentiality of the Company’s internal information shall continue to observe this obligation both during their term of employment and for three (3) years following the termination of their employment agreement.

4.6. While in possession of any non-public Company information, it is prohibited to engage in trading of securities or other transactions, to disclose such information to others, or to use it—whether directly or indirectly—for personal gain.

4.7. Employees shall not conceal or suppress information relating to unlawful acts or omissions; nor shall they exploit any information obtained through the Company’s business channels—whether from clients, partners or suppliers—for personal advantage, nor conduct business through unfair methods such as misrepresenting or distorting the true circumstances.

## **FIVE. FAIR COMPETITION**

5.1. Conduct the Company’s activities in accordance with the Competition Law and other relevant statutes and regulations.

5.2. Refrain from any unlawful acts against competitors.

5.3. Refrain from obtaining information about competitors by illegal means.

5.4. Refrain from engaging in advertising or promotional activities prohibited by law or unlawful.

5.5. Provide clients, partner organizations and suppliers equal opportunities; deal with them fairly and respectfully; and protect the confidentiality of their personal and business information.

## **SIX. COMPANY ASSETS**

6.1. Employees shall use the Company’s assets frugally and responsibly.

6.2. Employees are entrusted with protecting all Company property and non-physical assets, including internal information.

6.3. All Company-owned property, equipment and technical tools shall be used exclusively for official duties.

6.4. No one may, without authorization, take, use, damage, destroy or sell Company assets or the property of others.

6.5. Employees must not use Company assets for personal benefit or for any financial gain.

## **SEVEN. CONFLICT OF INTEREST**

7.1. Employees must refrain from exploiting the authority conferred upon them for personal purposes or on behalf of any individual or legal entity and any other action related to conflict of interest.

7.2. Employees shall always prioritize the public and Company interest above personal or other interests and shall comply with all applicable laws, Company rules and procedures, and other legal documents.

7.3. If a situation arises that could give rise to a conflict of interest, the employee must immediately disclose it to Company management and work to follow any instructions to stray away from the situation.

7.4. A situation of conflict of interest can arise from, but not limited to, from the situations covered below and must be reported to the Compliance Department and resolved by the responsible Compliance Officer together with Executive Management, in accordance with prescribed procedures:

Receipt of Gifts and Valuable Items: Employees are to avoid accepting unexpected gifts or valuable items unrelated to their official duties. If the total value of such gifts or items exceeds one month's salary for the position, or if gifts or items from a single source over the course of one year exceed three months' salary, the employee must report and record them with the Compliance Department within 30 days. If the value of such gifts and valuables is less than six month's salary, the employee may keep the items. For amounts exceeding these thresholds, Executive Management will determine the appropriate course of action.

7.4.1. Participating in public events, representing the company: Refrain from participating in events that may harm the company's reputation. When representing the company at official events, strive to use proper conduct that upholds the company's reputation.

## **EIGHT. CORRUPTION AND BRIBERY**

8.1. It is not permitted to misuse one's vested authority for personal gain, to grant advantages to others, or to accept bribes and kickbacks with the aim of obtaining such illegal advantages from individuals or legal entities.

8.2. To give or receive extravagant free gifts, valuables, receptions, discounts, services, rewards, and promotions to or from anyone.

8.3. Not to make donations to any political party without the permission of the company's management.

8.4. Not to use the company's movable and immovable property for any political activities.

8.5. Not to violate applicable anti-corruption laws, as well as the company's charter, rules, procedures, and instructions.

## **NINE. REPORTING VIOLATIONS**

9.1. If an employee becomes aware of a violation or potential violation of the laws of Mongolia and the norms stipulated in this Code of Conduct, they are obliged to immediately report it to the Company's Compliance Department.

9.2. The Company's Compliance Department is responsible for receiving reports of violations at all times and for maintaining the confidentiality of the informant.

9.3. Reports of violations shall be submitted in writing or by official e-mail.

9.4. The employee shall decide whether to remain anonymous when reporting a violation.

9.5. Upon the request of the informant, the official in charge will provide an update on the status of the violation's resolution and the measures taken.

9.6. Officials who have reviewed, resolved, or investigated a complaint or report shall, under all circumstances, protect the security of the complainant's information.

## **TEN. RESOLVING VIOLATIONS**

10.1. The officials authorized to implement and monitor the implementation of this Code of Conduct, review and resolve violations, and report thereon shall consist of the Executive Management, an employee of the Administration and Human Resources department, and an employee of the Compliance department.

10.2. The officials authorized to resolve violations of the Code of Conduct have the following rights and duties:

10.2.1. To meet with the complainant, listen to their explanations and suggestions, and receive relevant evidence, materials, and documents;

10.2.2. To obtain a written explanation from the employee who committed the violation, and if necessary, have additional explanations presented at a meeting with authorized officials;

10.2.3. To investigate and determine whether a breach of conduct occurred, and to hold a meeting and issue a conclusion within 5 working days on whether to impose a disciplinary sanction for the act or omission that violated this Code of Conduct;

10.2.4. To monitor the implementation of this Code of Conduct and ensure its enforcement;

10.2.5. To report on the implementation of this Code of Conduct to the Board of Directors at least once a year.

10.3. An authorized official who has received information about a violation is prohibited from intentionally or unintentionally concealing the violation, or from putting pressure on or harassing the complainant or informant.

### **ELEVEN. ACCOUNTABILITY**

11.1. An employee of the company who has caused harm to the interests of the company and its employees, created conditions that could cause harm, violated the company's internal rules and regulations, violated this Code of Conduct, or knowingly failed to report an unethical act, shall be subject to disciplinary action.

11.2. In the event of a violation of this Code of Conduct, accountability shall be imposed in accordance with the Internal Labor Regulations and this Code of Conduct.

11.3. In the event that an authorized official discloses information related to a complainant or informant, accountability shall be imposed in accordance with the Internal Labor Regulations and this Code of Conduct.