

DOCUMENT NAME:

COMPLIANCE POLICY OF GOBI JSC

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1. GENERAL

1.1 Purpose

1.1.1 The purpose of this policy is to ensure that our organization operates with integrity and in compliance with legal requirements, obligations, and commitments. This policy aims to integrate organizational values and ethical principles into responsible behavior, manage compliance risks, and promote a culture of ethical conduct.

1.2 Scope

1.2.1 This policy serves as an official document that embodies the senior management's dedication to regulating all activities involving employees, subsidiaries, contractors, and suppliers of Gobi JSC, while ensuring their compliance with legal requirements, promoting ethical conduct, and adhering to business and employee ethics. Furthermore, this policy shall be made publicly available.

1.3 Definition of Terms

1.3.1 **Compliance:** The ability to conform to legal requirements and commitments that the organization has decided to comply with.

Note: Implementing compliance effectively requires integrating it into the organizational culture and fostering the appropriate behaviors and attitudes among all personnel.

1.3.2 **Compliance Unit:** An officer responsible for managing compliance functions.

1.3.3 **Compliance risk:** The potential impact on the compliance objectives due to non-compliance with legal requirements and commitments.

1.3.4 **Compliance requirements:** Legal provisions, government regulations, special permits, licenses, court decisions, required standards, and other mandatory requirements that the organization must comply with.

1.3.5 **Compliance commitment:** Contractual obligations, organizational policies and regulations, instructions, and other voluntary commitments that the organization has decided to comply with.

1.3.6 **Compliance culture:** The values, ethics, and beliefs that emerge from the interaction of control systems and structures and promote a culture of ethical conduct.

- 1.3.7 **Management system:** A set of processes aimed at achieving the organization's goals by creating mutual coordination and mutual influence among its stakeholders.
- 1.3.8 **Policy:** A document that outlines the organization's overarching direction and objectives, providing employees with guidance for decision-making in order to align their actions with the organization's goals.

2. POLICY

2.1 Compliance Policy

- 2.1.1 Based on the principles of business ethics, compliance requirements and commitments will be developed in line with the operations, while continuously enhancing knowledge and skills to strengthen the organizational culture.

2.2 Compliance Goals and Objectives

- 2.2.1 Relevant compliance regulations will be developed and distributed to all employees to increase knowledge and understanding, clarify rights and duties, and foster an organizational culture by regularly reinforcing and monitoring compliance requirements and commitments. The ultimate goal is to achieve "VIOLATION = 0" and reduce compliance risks. The following objectives shall be pursued within this framework:

- 2.1.1.1 Ethical standards: Adherence to the ethical principles stipulated in the Code of Conduct of Gobi JSC aims to conduct business activities fairly and within the law, with the goal of minimizing ethical violations.
- 2.1.1.2 Compliance requirements and commitments: Operating in a transparent and open manner according to compliance requirements and commitments prevents legal liability and financial loss.
- 2.1.1.3 Compliance risk management: Identifying, assessing, evaluating, managing, and continuously monitoring potential compliance risks, while implementing preventative measures for over 80 percent of identified risks.
- 2.1.1.4 Corruption- and Conflict-of-Interest-Free Operations in Compliance with Laws and Regulations: All employees shall strive to be free from corruption and conflicts of interest, aiming for a 5-10 percent improvement in the outcomes of corruption and conflict-of-interest surveys.

2.3 Principles

- 2.3.1 We will adhere to the principles of fairness, transparency, and openness in all our activities.

2.3.2 By enhancing the system and encouraging employee initiative and participation, we will improve our processes while maintaining a non-accusatory approach..

2.3.3 We will uphold the principles of equality, friendliness, and respect in all relationships..

2.3.4 Prioritizing the interests of the Company over personal interests and actively avoiding conflicts of interest.

2.4 Slogan

“FOLLOW ETHICS AND RULES FOR A BETTER FUTURE”

3. LEADERSHIP, ROLES, AND RESPONSIBILITIES

3.1 Roles and Responsibilities of Compliance Policy

Table no.1 RACI Matrix for Compliance Policy

Process	Senior management	Middle management	Employees	Compliance Unit
<i>/R-Responsible (works on), S-Support, A-Approve, I-Informed/</i>				
Development and approval the compliance policy	R, A	I	-	R
Dissemination of compliance policy to all employees and increasing awareness	-	S	I	R
Providing accessibility to stakeholders	S	-	-	R
Implement compliance policy in operations	S	R	R	S
Providing a methodology for the implementation of compliance policy	S	-	-	R
Policy revision	S	R	-	R

3.1.1 The Company shall implements the Compliance Management System policy, monitors performance, continuously enhances compliance with requirements and commitments, and mitigates compliance risks by adhering to ethical standards.

3.1.2 The members of the management team shall be responsible for implementing the Compliance Management System in their operations, managing compliance requirements and commitments, and leading their teams by exemplifying ethical standards.

3.1.3 Middle management shall be responsible for implementing the Compliance Management System, ensuring compliance with requirements and commitments, and setting a commendable ethical example.

- 3.1.4 Employees shall strictly follow the Code of Conduct, Compliance Policy, and other rules, regulations, instructions, and guidelines of Gobi JSC. They shall adhere to ethical standards and report any violations they become aware of.
- 3.1.5 Contracted companies, suppliers, and contracted employees shall adhere to Gobi JSC's Compliance policy, rules, regulations, and instructions.