

DOCUMENT NAME:

WHISTLEBLOWING SYSTEM OPERATING PROCEDURES OF
GOBI JSC

АГУУЛГА

1. GENERAL	4
1.1 Purpose	4
1.2 Scope	4
1.3 Definitions	4
1.4 Principle of Whistleblowing System	6
1.5 Guidelines for the members of the Board of Directors, Nomination Committee and Ethics Committee	6
1.6 Reasons for receiving or not receiving information	6
1.6 RACI matrix	7
2. WHISTLEBLOWING PROCESS	8
2.1 Whistleblower Information Submission	8
2.2 Whistleblowing Requirements	9
2.3 Receiving, sorting and submitting information	10
2.4 Identifying Causes and Correcting Violations and Non-Conformities	11
2.5 Implementation and Improvement Actions Based on Decisions	12
2.6 Communicate with whistleblowers and provide information on improvements .	12
2.7 Record keeping, reporting and document retention	12
3. STAKEHOLDER PARTICIPATION	13
3.1 Participation of Board Members	13
3.2 Participation of the Nomination Committee	13
3.3 Participation of the Ethics Committee and its composition	13
3.4 Rights and Duties of the Chairman of the Ethics Committee	14
3.5 Ethics Committee Meeting Minutes	15
3.6 Effectiveness of the Decisions of the Ethics Committee Members	15
3.7 Incentives for Ethics Committee Members	16

4. RIGHTS AND RESPONSIBILITIES..... 16

4.1 Rights of Whistleblower 16

4.3 Rights of Information Recipients..... 16

4.4 Responsibilities of Information Recipients 16

4.5 Responsibilities of Stakeholders..... 17

1. GENERAL

1.1 Purpose

1.1.1 The purpose of this procedure is to minimize Gobi JSC's compliance risk and promote ethical business practices.

1.1.1.1 Our goal in implementing a whistle-blowing system is to enhance our relationship with stakeholders, detect ethical issues within our operations early on, prevent and address potential risks, strengthen employee trust in our Company, and support our sustainable development objectives.

1.2 Scope

1.2.2 This procedure shall be publicly accessible and cover all violations, inconsistencies, and breaches of Gobi JSC's Code of Conduct that may harm public or private interests by board of directors, employees, customers, shareholders, governmental and non-governmental organizations, suppliers, partners, and contractors;

1.2.3 Report any violations, omissions, or non-compliance with the Code of Conduct;

1.2.4 Report any non-compliance with legal requirements or other regulations;

1.3 Definitions

1.3.1 The following terms are used in this procedure:

1.3.1.1 **Whistleblower:** An individual, groups of people, interested parties, or enterprises who reports or discloses information about any violation of public or private interests, including illegal or unethical behavior, fraud, confidential information, and activities;

1.3.1.2 **Whistleblowing:** The act of providing information, filing petitions, or complaints about situations and actions that harmed or may harm public or individual interests;

1.3.1.3 **Conflict of interest:** A conflict of interest arises when an employee's personal interests or those of related third parties clash with the Company's interests and official duties. This have the potential to negatively impact the employee's ability to carry out their responsibilities fairly and accurately;

1.3.1.4 **Company interests:** Company interests refer to both material and non-material interests that align with the company's values, principles, strategies, management policies, decisions, rules, regulations, instructions, and methods.;

- 1.3.1.5 **Personal interests:** Personal interests include both material and non-material interests that can be influenced by the employee or related parties while performing official duties;
- 1.3.1.6 **Public interest:** Public interest refers to the general welfare of the public;
- 1.3.1.7 **Stakeholders:** Stakeholders are organizations and individuals who can influence or be influenced by the activities and decisions of the Company;
- 1.3.1.8 **Discrimination:** Discrimination is treating someone differently based on their age, sex, origin, religion, or other factors rather than their individual qualifications;
- 1.3.1.9 **Violation:** Any behavior, act, or omission that violates or attempts to violate laws, rules, regulations, or ethics;
- 1.3.1.10 **Information:** Any information that is related to violations of ethics, legal requirements, commitments, corruption, conflicts of interest, or violations of the organization's code of ethics;
- 1.3.1.11 **Advantage:** Any economic or non-economic benefit that is obtained by an individual or legal entity due to the abuse of official authority;
- 1.3.1.12 **Fraud and deception:** Act of using one's position of authority to deceive or betray the trust of others in order to acquire their property or ownership rights;
- 1.3.1.13 **Corruption and bribery:** Offering, demanding, or obtaining of financial or other advantages by illegal means, directly or indirectly, in order to to gain benefits for oneself or others. Note: Corruption includes money and cash equivalents (e.g., discounts, discount cards, money checks), gifts, entertainment, other types of visits and entertainment, travel, support, favorable decisions (employment, contract, licensing, etc.), grants, and donations.
- 1.3.1.14 **Nomination Committee:** A committee under the Board of Directors that is responsible for establishing the policies to be followed regarding the company's board members, CEO, and other authorized officials. The committee also has the responsibility to monitor and manage the activities of these individuals. The committee also provides opinions and recommendations to the board of directors, issues guidelines, and makes decisions on matters as required by laws and regulations, within the scope of its duties;
- 1.3.1.15 **Ethics Committee:** A working group that is established by the Company to detect and correct ethical violations in accordance with this procedure. The committee is composed of representatives from different departments and levels of the Company;

- 1.3.1.16 **Ballot:** A document that is used by the members of the Nomination Committee and the Ethics Committee to make a decision after reviewing and reviewing the information received from the whistleblower;

1.4 Principle of Whistleblowing System

- 1.4.5 Pursuant to the Whistleblowing Procedure, employees of the Company are obligated to report and voice their concerns regarding any unethical or illegal behavior.
- 1.4.6 Any violation of ethical or legal standards, even if known, is considered unethical.
- 1.4.7 Whistleblowers shall not face any retaliation, including wage reduction, suspension, or verbal or written threats.
- 1.4.8 The Company shall ensure the confidentiality of information and protect whistleblowers through secure channels that are easily accessible.
- 1.4.9 When addressing any violation related to whistleblowing information, the aim is to identify and correct any issues, improve activities and performance, and rectify errors related to the violation.

1.5 Guidelines for the members of the Board of Directors, Nomination Committee and Ethics Committee

- 1.5.1 Members shall not make emotional decisions when resolving disputes..
- 1.5.2 Members shall be independent of other members, staff, and interested parties when resolving disputes.
- 1.5.3 Members shall respect human rights and freedoms when resolving disputes.
- 1.5.4 Members shall act fairly when resolving disputes.
- 1.5.5 Members shall adhere to the organization's code of conduct when dealing with violations.

1.6 Reasons for receiving or not receiving information

- 1.6.1 The Board of Directors, the Nomination Committee, and the Ethics Committee will identify the cause of the violation and make a decision to eliminate it.
- 1.6.2 The Board of Directors, the Nomination Committee, and the Ethics Committee will inform the whistleblower of the results of the resolution of the violation. If the whistleblower does not accept the results of the investigation, they may submit a complaint to the Compliance Manager, who will then re-transfer the complaint.
- 1.6.3 The Board of Directors, the Nomination Committee, and the Ethics Committee will not make a decision on violations in the following cases:
- 1.6.3.1 Whistleblowing with clearly false information (the violation cannot be resolved if it is impossible to prove that it is defamatory or if there is information that defames a person in a clearly false manner);
- 1.6.3.2 Whistleblowing without evidence;

1.6.4 The Board of Directors, the Nomination Committee, and the Ethics Committee will notify the information recipient of a reasoned response to the failure to resolve the violation. The information recipient will then respond to the whistleblower.

1.6.5 If a violation that’s been repeated more than twice, but doesn’t have evidence or it cannot be proven, the violation will be accepted and resolved based on details such as when, where, and who was involved.

1.6 RACI matrix

Table 1 RACI matrix

Process \ Position	Whistleblower	Whistleblowing system	Board secretary	Board	Nomination committee	Compliance manager	Ethics committee
<i>R-Responsible(works on), A-Accountable, R- Respon, C-Consulted, I-Informed</i>							
Whistleblowing	RA	I					
Receiving information on violations related to the Board of Directors and Management Team			I		RA	I	
Receiving information on violations related to the Nomination Committee			I	RA		I	
Receiving information on violations related to the Ethics Committee					RA	I	
Receiving information pertaining to ethics violations, legal requirements, and breaches of commitments						CI	RA
Identifying and addressing the root causes of violations	C		CI	RA			

and inconsistencies /Board of Directors/							
Identifying and addressing the root causes of violations and inconsistencies / Nomination Committee/	C		CI		RA	CI	
Identifying and addressing the root causes of violations and inconsistencies / Ethics Committee/	C		I			CI	RA
Implementing and enhancing measures based on the decisions made	CI		I			RA	I
Engaging with whistleblowers and providing updates on the progress of improvements	CI	I				RA	
Maintaining comprehensive records		I	I			RA	
Reporting	I	I	I	I	I	RA	I

2. WHISTLEBLOWING PROCESS

2.1 Whistleblower Information Submission

2.1.1 The Company accepts information related to corruption, conflict of interest, ethical violations, violations of legal requirements, and commitments of the stakeholders in the following formats:

2.1.1.1 Whistleblowing system (info.gobi.mn/whistleblowing);

2.1.1.2 Email (depending on the type of violation, the relevant email address is specified in clause 2.2.3 of this procedure/;

2.1.1.3 Official letter / by a designated box/;

2.2 Whistleblowing Requirements

- 2.2.1 Whistleblowers may blow the whistle for personal or public interest and submit information via email, whistleblowing system, official letter, or in a designated box placed in the Company's office.
- 2.2.2 When providing information, whistleblowers must include the following details:
- 2.2.2.1 Date;
 - 2.2.2.2 Details of the violation or non-conformity and the object of violation;
 - 2.2.2.3 Evidence /including images, photos, recordings, sound recordings, exchanged emails, chats, photos of letters/;
 - 2.2.2.4 Whistleblower's email address and contact phone number (not necessary if the whistleblower wishes to remain confidential);
 - 2.2.2.5 Names and positions of individuals and stakeholders who have harmed or may harm private or public interests;
 - 2.2.2.6 Explanation of circumstances and actions that have harmed or may harm private or public interests, along with related evidence;
- 2.2.3 The types of whistleblower information include the following:

№	Types of violations	Recipient of the information
1	Violations related to the Board of Directors	Nomination Committee /nomination@gobi.mn/
2	Violations related to the Nomination Committee	Board /board@gobi.mn/, Board Secretary /boardsecretary@gobi.mn/
3	Violations related to the Management team	Nomination Committee /nomination@gobi.mn/
4	Violations related to the Ethics Committees	Nomination Committee /nomination@gobi.mn/
5	Code of Conduct violations	Ethics Committees /wb@gobi.mn/, Compliance Manager /compliance.sdd@gobi.mn/
6	Violation of public interest	
7	Violation of individual rights	
8	Corruption and conflict of interest	
9	Violations related to fraud	
10	Violations related to abuse of power	

11	Information security breaches	
12	Violations of privacy	
13	Violations related to discrimination	
14	Violations related to workplace harassment or bullying	
15	Violations related to the protection of intellectual property	
16	Violations related to the company property accounting	

2.2.4 Whistleblowers can contact the whistleblowing system's phone number (70048888-4) to inquire about the whistleblowing system, the progress of their reported information, and its resolution. The Compliance Manager will provide explanations and information on how to blow the whistle, and keep a record of any instructions or information provided.

2.2.5 When providing information, whistleblowers have the option to keep their identity confidential as specified in Article 2.2.2.4 of this procedure.

2.2.6 A whistleblower can choose to remain anonymous when blowing the whistle in the public interest by submitting their complaint through a legal representative.

2.2.7 Whistleblowers may attach a letter containing personal information and reasons for whistleblowing in the public interest without disclosing their information. The Compliance Manager who receives the information and letter will keep the letter sealed and deal with it.

2.3 Receiving, sorting and submitting information

2.3.1 Receiving and recording information

2.3.1.1 The whistleblower shall deliver the information to the receiver of the information.

2.3.1.2 The recipients of information on violations are the Board of Directors, Secretary of the Board of Directors, Nomination Committee, Ethics Committee, or Compliance Manager.

2.3.2 Sorting and submitting information

2.3.2.1 The receiver of information shall send violations related to the Board of Directors, Management Team, and Ethics Committee to the Nomination Committee's address or nomination@gobi.mn.

- 2.3.2.2 Information on violations related to the Nomination Committee should be sent to all members of the Board at board@gobi.mn and to the Secretary of the Board at boardsecretary@gobi.mn.
- 2.3.2.3 Information related to other ethical violations, legal requirements, and violations of obligations shall be sent to the Ethics Committee/Compliance Manager/Ethical Model Employee Representative at wb@gobi.mn, or compliance.sdd@gobi.mn.
- 2.3.2.4 When analyzing the information submitted to the Ethics Committee's designated box, the members of the Ethics Committee shall be present, and the information shall be classified and transferred to the relevant members.
- 2.3.2.5 Criminal and serious violations shall be reported to the Legal Department.

2.4 Identifying Causes and Correcting Violations and Non-Conformities

- 2.4.1 Once the whistleblower reports a violation, the Company has 60 days to resolve it and take corrective measures.
- 2.4.2 In order to identify and address the primary cause of the violation, the Board of Directors, Nomination Committee, and Ethics Committee members meet monthly and discuss the issue and make decisions on how to correct it.
- 2.4.3 Corrective and improvement measures shall be taken within 30 days of making the decision.
- 2.4.4 Violations or non-conformities that occur more than once and pose a risk to the organization without evidence are reported immediately to the Compliance Manager, Board of Directors, Nomination Committee, and Ethics Committee for resolution.
- 2.4.5 The Board of Directors, Nomination Committee, and Ethics Committee members act honestly and fairly in finding and resolving conflicts and inconsistencies, making reasonable decision.
- 2.4.6 If they cannot reach a unanimous decision, the matter shall be reconsidered and voted on.
- 2.4.7 The Board of Directors, Nomination Committee, and Ethics Committee shall adhere to ethical decision-making principles when identifying causes for violations and non-conformities. This includes analyzing violations based on evidence and reasoning, gathering necessary information to discover the cause, developing possible solutions based on the collected information, evaluating solutions, and making decisions by voting on possible solutions.
- 2.4.8 Members are responsible for maintaining confidentiality of decisions related to violations and non-conformities.

- 2.4.9 If necessary, further investigation to identify and correct the cause of the violation shall be conducted in collaboration with the Internal Audit Department and Legal Department.

2.5 Implementation and Improvement Actions Based on Decisions

- 2.5.1 The Compliance Manager shall receive information on the decisions made by the Board of Directors, the Nomination Committee, and the Ethics Committee.
- 2.5.2 The Compliance Manager shall then notify the relevant office, department, or unit, which will implement the decision.
- 2.5.3 The relevant office, department, or unit shall cooperate with the Compliance Manager to implement the decision to correct violations and inconsistencies. The Compliance Manager shall monitor the implementation process.
- 2.5.4 The Compliance Manager prepares quarterly reports summarizing information on violations and non-conformities.

2.6 Communicate with whistleblowers and provide information on improvements

- 2.6.1 If requested by the whistleblower, the Compliance Manager provides information on the results of implementation and improvement.
- 2.6.2 The Compliance Manager shall keep a report of the progress of the whistleblower's information updated in the Whistleblowing System periodically, which can be accessed at <http://192.168.80.21:9000/dashboard/answer>.

2.7 Record keeping, reporting and document retention

- 2.7.1 The Compliance Manager is responsible for maintaining documentation relating to the operation of the whistleblowing system.
- 2.7.2 All information related to whistleblowing shall be handled confidentially, and the organization will ensure information security. The Compliance Manager shall cooperate with relevant departments and units to discuss and monitor the elimination of violations and non-compliances.
- 2.7.3 The Compliance Manager is responsible for maintaining the confidentiality of the organization.
- 2.7.4 The whistleblower registration, reporting, and document storage will be labeled with the whistleblower's registration number. The progress of the information will be reviewed and reported to the system, and the details of the violation will be attached and archived.

3. STAKEHOLDER PARTICIPATION

3.1 Participation of Board Members

- 3.1.1 The members of the Board of Directors shall meet and make decisions in accordance with the Operational Procedure of the Board of Directors of Gobi JSC when identifying causes for violations and non-compliances and making decisions.

3.2 Participation of the Nomination Committee

- 3.2.1 The members of the Nomination Committee shall hold a meeting and make a decision in accordance with the Charter of the Nomination Committee of Gobi JSC identifying causes for violations and non-compliances and making decisions..

3.3 Participation of the Ethics Committee and its composition

- 3.3.1 One employee representative from each division and department of the company will be selected to form the Ethics Committee.
- 3.3.2 When selecting members of the Ethics Committee, exemplary employees who comply with the Company's Code of Conduct shall be nominated by the employees.
- 3.3.3 Members of the Ethics Committee shall be responsible for maintaining confidentiality regarding any violations and must adhere to the Company's procedure on confidentiality.
- 3.3.4 Ethics Committee members must have independent opinions without religious or political affiliations or conflicts of interest with management or employees, and their opinions must align with the Company's Code of Conduct.
- 3.3.5 Ethics Committee shall consist of an odd number of members.
- 3.3.6 Ethics Committee members shall be selected and appointed in the second week of January each year through an election process that includes each division and department.
- 3.3.7 Members of the Ethics Committee shall serve for a period of one year.
- 3.3.8 Ethics Committee shall be composed of the following members:

Table 2 Composition of the Ethics Committee

№	Position	Working Group
1	Global sales department /China/, /North America, Europe/	1 member of the Ethics Committee
2	Sales department	1 member of the Ethics Committee

3	Design development department	1 member of the Ethics Committee
4	Department of Industrial Management	1 member of the Ethics Committee
5	Department of Financial Management, Financial Accounting Department	1 member of the Ethics Committee
6	Department of Human Resources Procurement Division	1 member of the Ethics Committee
7	Department of Information Technology	1 member of the Ethics Committee
8	Legal Department, Department of Property Maintenance	1 member of the Ethics Committee
9	Sustainable Development Division, Occupational Hygiene, Safety and Environment Division	1 member of the Ethics Committee

3.3.9 The composition of the Ethics Committee shall change accordingly when the organizational chart, location, or department name changes.

3.3.10 The Chairman of the Ethics Committee shall be appointed for a period of 1 year by a majority vote of the members of the Ethics Committee.

3.3.11 The Secretary of the Ethics Committee shall be appointed for a period of 1 year by a vote of the members of the Ethics Committee.

3.3.12 The Secretary of the Ethics Committee shall be responsible for organizing meetings, informing the members of necessary news and events, and keeping minutes of the meetings.

3.3.13 Members of the committee are prohibited from using any confidential or internal information provided by the company for personal gain, directly or indirectly, disclosing it to others, or transmitting it to third parties.

3.4 Rights and Duties of the Chairman of the Ethics Committee

3.4.1 The responsibility of leading meetings and making decisions based on ethical principles lies with the Chairman of the Ethics Committee.

3.4.2 Chairman of the Ethics Committee shall possess equal voting rights as other members.

3.4.3 In case of necessity, the Chairman has the right to convene an extraordinary meeting and can receive advice and assistance from external consultants and lawyers.

3.4.4 The Chairman of the Ethics Committee has the right to submit to the CEO a proposal to ensure the conditions for the normal operation of the Committee, including providing the necessary news, information, and facts, and to hold accountable any employees or officials who do not provide the relevant information.

- 3.4.5 The Ethics Committee has the right to receive advice and assistance from external consultants, experts, and lawyers, and hire them for specific issues.

3.5 Ethics Committee Meeting Minutes

- 3.5.1 The Secretary of the Ethics Committee is responsible for keeping minutes of the meetings.
- 3.5.2 The minutes of the meeting must include the following information: place, date, and time of the meeting, members in attendance, issues discussed, matters resolved by voting, voting results, and decisions made.
 - 3.5.2.1 Place, date, and time of the meeting;
 - 3.5.2.2 Members who attended the meeting;
 - 3.5.2.3 Agenda items;
 - 3.5.2.4 Items resolved by voting and voting results;
 - 3.5.2.5 Meeting decisions;
- 3.5.3 Audio recordings shall be made during meetings and archived by the Secretary of the Ethics Committee.
- 3.5.4 The Secretary shall complete the minutes within five working days after the meeting and send them to the Chairman and members of the Ethics Committee by email for presentation and review.
- 3.5.5 If any member refuses to sign, they shall provide a written explanation.
- 3.5.6 Inaccurate minutes of the Ethics Committee meeting shall not invalidate the meeting's decisions.

3.6 Effectiveness of the Decisions of the Ethics Committee Members

- 3.6.1 The Chairman and each member of the Ethics Committee shall have one vote in resolving violations and non-compliances at the meeting of the Ethics Committee. The Secretary of the Ethics Committee shall not have the right to vote.
- 3.6.2 Decisions are made based on a majority vote of members attending in the meeting.
- 3.6.3 If a Committee member's is works at the department or division of the violation being resolved, they shall attend the meeting but are not allowed to vote on the decision.
- 3.6.4 If a member is unable to attend the meeting due to valid reasons, they shall submit their vote in advance. This vote shall be considered as a valid vote.
- 3.6.5 Decisions made by the Ethics Committee shall be implemented by a resolution of the Executive Director.
- 3.6.6 The Secretary of the Ethics Committee shall prepare and submit a report to the Compliance Manager summarizing decisions made based on whistleblower information.

3.7 Incentives for Ethics Committee Members

- 3.7.1 Members of the Ethics Committee shall be rewarded for their service with a monthly salary increase of 200,000 MNT.

4. RIGHTS AND RESPONSIBILITIES

4.1 Rights of Whistleblower

- 4.1.1 Whistleblowers shall have the right to be protected from retaliation, discrimination, or harassment as a result of their whistleblowing in the public interest.
- 4.1.2 Whistleblowers may to keep the information confidential unless they have given permission to disclose it to others.
- 4.1.3 Whistleblowers have the right to file a complaint if their personal information is disclosed without permission.

4.2 Responsibilities of Whistleblower

- 4.2.1 Whistleblowing with the intention of personal gain or benefiting a related person or organization is not allowed and shall be held accountable.
- 4.2.2 Whistleblowing with the intention of harming a person's dignity, reputation, or the reputation of the organization is not permitted and shall be held accountable.
- 4.2.3 Disseminating unsolved violations and spreading false information publicly shall be held accountable.
- 4.2.4 Whistleblowers can be held responsible for improper communication with the recipient of the information when submitting information about a violation by phone.

4.3 Rights of Information Recipients

- 4.3.1 Information recipients have the right to inquire about the information related to the reported violation when receiving information from whistleblowers.
- 4.3.2 Information Recipients have the right to refuse to receive communication from the whistleblower if the recipient deems the whistleblower's communication to be improper.

4.4 Responsibilities of Information Recipients

- 4.4.1 Information recipients shall be prohibited from disclosing the whistleblower's information and any secrets related to the activities and decisions of the Nomination Committee and the Ethics Committee in detecting violations and making decisions.
- 4.4.2 All information related to violations and non-compliances must be strictly protected and secured, and any unauthorized disclosure shall be subject to disciplinary action as per company confidentiality regulations.
- 4.4.3 The personal information of whistleblowers and information related to violations and non-compliances must be strictly protected.

- 4.4.4 Information recipients should approach whistleblowing activities with integrity and avoid emotional biases.
- 4.4.5 Information recipients should act independently from stakeholders and interested parties.
- 4.4.6 Information recipients must adhere to the Company's Code of Conduct while participating in all whistleblowing activities, protecting human rights, ensuring fairness, and upholding ethical standards.

4.5 Responsibilities of Stakeholders

- 4.5.1 All stakeholders must adhere to the principles specified in article 1.4 of the procedure.
- 4.5.2 Violations of the Code of Conduct, such as conflicts of interest, disclosure of secrets, corruption, etc., must be resolved in accordance with Article 5.2 of the Code of Conduct of Gobi JSC.
- 4.5.3 If the whistleblower's information is found to be false, misleading, or defamatory, disciplinary action will be taken, up to and including dismissal, as per internal labor regulations outlined in Article 5.2.3 of the Code of Conduct of Gobi JSC.
- 4.5.4 It is strictly prohibited to reduce the wages of whistleblowers, discriminate against them in the evaluation of their work results or awarding incentives, conduct inspections without their consent, or disclose the results of any inspections.
- 4.5.5 It is prohibited to disclose any confidential information related to the actions and decisions of the Nomination Committee and the Ethics Committee in detecting violations and inconsistencies, finding reasons, and making decisions;
- 4.5.6 It is strictly forbidden to organize a special meeting or to interrogate any person or employee by name in all activities related to the procedure according to the whistleblower's information.
- 4.5.7 The names and personal information of any involved party should not be mentioned unless necessary for clarifying the whistleblower's violation information. Only in cases where verifying the truthfulness of an action is required, ask questions and seek clarification the person who committed the violation or was involved in the process may ask questions and seek clarification.
- 4.5.8 Avoid communicating with the employee in a way that is restrictive, accusatory, or imposes the decision when seeking clarifications, and decision-making responsibility shall not solely assigned to the employee.
- 4.5.9 Clarifications should be limited to inquiries, discussions, and questions about violations, and ensure that they remain unbiased and impartial.

END OF DOCUMENT