

OUR CODE OF ETHICS



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The Code of Ethics is to ensure that each of our employees, management and directors act with integrity in everything that we do to protect and enhance our reputation of GOLOMT.

Golomt is the sacred hearth of the Mongolian household and it symbolizes Mongolian household's spirit, strength and prosperity. By following our code of ethics, we foster an ethical culture that will preserve our heritage of integrity and preserve our most important asset, reputation.

This Code of Ethics is to set out the principles and practices that define our ethical standards and conduct and Golomt Financial Group's business principles are foundation of our Code of Ethics.

OUR BUSINESS PRINCIPLES

WE STRIVE TOWARD INNOVATION AND EXCELLENCE IN OUR WORK

We strive to be the pioneer in introducing the latest financial products and services to our clients to supporting their financial needs while delivering consistent returns to our shareholders through innovation and technology.

WE STRESS PROFESIONALISM AND ETHIC IN OUR WORK

We are committed to complying fully with the spirit of laws and rules, ethical standards and principles that govern us.

WE EMPHASIZE INTEGRITY AND RESPONSIBILITY IN OUR WORK

We keep our promises to our clients at all times, compete fairly and openly, conduct our business transparently while maintaining our personal and company integrity and reputation vigorously.

WE CREATE THE BEST CORPORATE CULTURE IN OUR COMPANY

We strive to create the best work environment where employees are able to improve their skills and knowledge continuously as well as building corporate culture where teamwork, peer learning and work satisfaction come under one roof.

WE LEAD WITH OUR CORPORATE CITIZENSHIP

We invest to our future generation's education, preservation of culture, heritage and protection of environment through our business operations and corporate social responsibility. It is essential that we follow these principles in our work to establish the highest ethical and professional standards and deliver the best solutions that meet or exceed our stakeholders' expectations at all times.

**THE CODE
APPLIES TO
ALL OF US**

Each employee and directors Golomt Financial Group /Company/ and its direct and indirect subsidiaries are required to adhere to Code of Ethics and it is inseparable part of Company's policy and regulation documents. It covers our relations with stakeholders, clients, counterparties, business partners, shareholders and regulators. Compliance with Code of Ethics is a condition of employment and not knowing the code is not an excuse for violation. Each employee needs to make sure our day-to-day actions and decisions follow the standards set out here.

**ADHERENCE
TO THE LAW,
RULES AND
REGULATIONS**

We obey and respect the laws, rules and regulations of Mongolia or of any other countries where we have business dealings as well as our own Company's policies and procedures. Each one of us is responsible for learning the relevant laws, regulations, Company policies and procedures.

We act fairly, honestly and in good faith towards everyone we deal with: our clients, business partners, competitors, the public and each other. We cooperate openly and transparently with our regulators, public and shareholders.

We have a duty to contribute to the integrity of the financial system as well as our own business. In doing so, we set out policies to combat with money laundering, terrorism and corruption. We strictly follow regulations and we report any suspicious activities.

**BEHAVING
ETHICALLY**

We follow our values in conducting our business ethically.

We regard client satisfaction as utmost priority by keeping our promises at all times and exceeding their expectations with our products and services to build the most trustworthy and profitable relationship based on mutual trust and respect with our clients. We treat them with fairly with the same courtesy and respect.

We strive to be the pioneer in delivering the world class financial products and services integrating the latest technological developments and creating the most suitable solutions to clients' needs.

We put our clients' interest before our own and the Company's interest before our own personal. To avoid conflict of interest we are guided by conflict of interest policies and procedures.

CREATING THE RIGHT CORPORATE CULTURE

We believe our success is built upon highly professional, skilled and ethical employees united under common goal to deliver exceptional products and services for our clients through collaboration, expertise and innovation. We create value to our clients and shareholders through professionalism, integrity and excellence of what we do and our work environment is such where talent can thrive to reach its full potential.

Different backgrounds, opinions and thoughts are welcomed as they make us a stronger business. Hence, we work to create a culture where everyone is welcomed, respected and a valuable part of our Company. We do not tolerate any kind of discrimination, bullying or harassment. We keep our work place safe by following health and safety roles.

None of the Company directors and staff is allowed to work for or extend service for money or otherwise to any other company, entity or individual.

INFORMATION SAFETY AND DISCLOSURE

We safeguard at all times the confidentiality of all information. We keep sensitive, confidential information about our businesses, plans, and our intellectual property, safe and secure.

We maintain the highest standards of information security to keep our client information confidential and to protect their privacy rights. We never share our clients' details with anyone, unless we have their express permission to do so, or where we have a legal duty to share it with the relevant authorities.

SOCIAL RESPONSIBILITY

We are constantly looking for better ways to do business, which are environmentally sound and socially responsible. This means managing and reducing any negative impact we might have on the environment. We support activities that address health and education of our future generations, support gender issues or help us to preserve our unique cultural heritage.

UPHOLDING THE CODE

With no exceptions, everyone in the Company adheres to this Code at all times. Anyone who breaks the rules (whether it is our Code or outside laws, rules and regulations) will face serious consequences – from warnings to demotions or dismissal. Any potential violations of this code need to be reported.



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