

Whistleblowing Policy Statement

The policy regulates relations in connection with whistleblowing from bank employees and any parties engaged in contractual dealings with the bank, receiving information from the whistleblower, and addressing the issue. The aim of this policy is to detect issues and solve them in a timely manner, protect the whistleblower, and preserve information confidentiality.

Triggers for whistleblowing:

- Breach of trust that may cause damage to the Bank's property, funding, capital or reputation;
- Acts of discrimination against people based on their origin, ethnicity, language, race, age, gender, sexual orientation, social origin, social and marital status, wealth, occupation, position, religion, opinion, and education;
- Non-Disclosure of Conflict of Interest;
- The act of pressuring the employee in any form with use abuse of authority;
- Sexual or emotional harassment or coercion;
- Negligence or misconduct in one's profession or position;
- Concealment of any illegal or ethical violation, including but not limited to involvement in corruption or bribery;
- Actions or omission that can be considered as other risks;
- Violation of insider trading laws, regulations and policies
- Other actions the employee believe that are risky.

The whistleblower must report the information by sending it to a dedicated email address for receiving whistleblowing cases (**shugel@xacbank.mn**), or reporting in person to the Chief Auditor. The whistleblower has to provide any available evidence or proof he/she can give.

Whistleblowers may submit information with full anonymity without providing personal information or means to reach them back.

The employee who received information from the whistleblower and the employees who inspected the information must protect and avoid making the whistleblower a victim because they reported a case in full honesty.

The employee who received information from the whistleblower and the employees who inspected the information are responsible for protecting the confidentiality of the information and the whistleblower.

Even if the information reported by whistleblower was proven to be not accurate during the inspection, the whistleblower wouldn't be responsible for it.

If the employee discloses the identity of the whistleblower or their submitted information, the employee will receive disciplinary punishment according to the internal labor policy.