

WHISTLEBLOWING PROCEDURE

1. GENERAL PROVISIONS

1.1. Purpose

This Premium Nexus JSC Whistleblowing Procedure (“**Procedure**”) is established to regulate relations pertaining to the creation of conditions for whistleblowing, and to support, protect, and reward whistleblowers in the interests of, and for the benefit of the Company and its subsidiaries and affiliated companies (collectively “**Company**”) — in the interests of transparency, integrity, environment, health, and safety — and to prevent any acts that may worsen the whistleblower’s circumstances.

1.2. Scope

This Procedure shall be complied with by all employees, staff, contracted workers, suppliers, and business partners participating in the Company’s operations, as well as parties likely to influence or be influenced by the Company’s operations.

1.3. Oversight and Amendments

The Company’s Board of Directors (“**BOD**”) Environmental, Social, and Governance Committee (“**ESG Committee**”) shall periodically review this Procedure and, where deemed necessary, present proposed amendments to the BOD for approval; any amendments shall become effective upon approval by the BOD.

1.4. Terms of the Procedure

This Procedure shall comply with applicable laws of Mongolia and the Company’s Charter. In the event of a discrepancy between this Procedure and the Company’s Charter, the Company’s Charter shall prevail. Furthermore, if this Procedure is inconsistent with applicable laws, the relevant legal regulation shall prevail. Any ambiguity or dispute regarding the interpretation or application of provisions of this Procedure shall be resolved upon the proposal of the Chairman of the BOD with the participation of other BOD members. Any matter not addressed in this Procedure shall be resolved in accordance with applicable laws of Mongolia, the Company’s Charter, and other legal documents.

1.5. Definitions

The following terms used in this Procedure shall be understood with the meanings set out below:

- 1.5.1. “**Conflict of Interest**” means a situation where the personal interests of authorized officers and employees conflict with their position, duties performed, and the Company’s interests, in a manner that could adversely affect the proper and fair performance of official duties;
- 1.5.2. “**Advantage**” means a situation where any employee or officer of the Company uses their official authority to create materially or non-materially beneficial conditions for themselves or for another company, individual, or legal entity;
- 1.5.3. “**Company’s Interests**” means material and non-material interests consistent with the Company’s values, principles, strategy, policies, decisions, rules, and regulations;
- 1.5.4. “**Related Party**” means the parents, siblings, family members, spouse, parents and siblings of a cohabiting partner, relatives, friends, and other persons with aligned interests of the relevant employee or officer;
- 1.5.5. “**Person with Aligned Interests**” means an individual or legal entity connected to the relevant employee or officer through profit-making activities;

- 1.5.6. “**Protective Measures**” means the measures set out in Article 7.2 of this Procedure aimed at protecting the safety, legal rights, and interests of the whistleblower;
- 1.5.7. “**Personal Interest**” means material and non-material interests that may influence authorized officers and employees — either by themselves or by related parties — in the exercise of their official powers;;
- 1.5.8. “**Large-Scale Damage**” means the amount of damage as defined in accordance with the currently effective Criminal Code of Mongolia;
- 1.5.9. “**Code of Ethics**” means the effective code approved by resolution of the Company's Board of Directors, as amended from time to time;
- 1.5.10. “**Whistleblower**” means an employee, contracted worker, officer, individual, or legal entity, or their representative, who provides information on unlawful or improper acts in the interests of the Company in accordance with this Procedure;
- 1.5.11. “**Whistleblowing**” means the act of providing information, submitting petitions or complaints, or making statements (“**Reporting**”) regarding acts or situations that have caused or may cause damage to the Company's interests, violations of laws, rules, and regulations, transparency, integrity, corruption and bribery, the environment, health and safety, and conflicts of interest respectively.

2. WHISTLEBLOWING

- 2.1. The following principles shall be observed in activities to support and protect whistleblowers:
 - 2.1.1. Strictly comply with the laws of Mongolia relating to the protection, collection, processing, use, and security of personal data;
 - 2.1.2. Respect the legitimate interests of individuals;
 - 2.1.3. Maintain the confidentiality of the whistleblower's information and personal data, and protect their reputation and employment;
 - 2.1.4. Cooperate with the whistleblower and base the processes of verifying the accuracy of information and clarifying the situation on collaborative engagement;
 - 2.1.5. Establish accessible, reliable, and secure channels to enable whistleblowing;
 - 2.1.6. Take measures aimed at correcting and preventing violations based on whistleblowing information;
 - 2.1.7. Promptly recognize and reward the contribution of whistleblowers who act in the Company's interests.
- 2.2. The whistleblower shall submit information in writing or electronically in the interests of the Company. The information shall be supported by specific evidence.
- 2.3. A whistleblower may blow the whistle in connection with providing information referred to in Article 1.5.9 of this Procedure and may report the following violations:
 - 2.3.1. Any act or omission in violation of the Company's Code of Ethics;
 - 2.3.2. Acts or omissions that violate the law and constitute a criminal offence;
 - 2.3.3. Unlawful acts including money laundering, tax evasion, and unlawful disclosure of personal data and business information;
 - 2.3.4. Acts and activities that may endanger the health and safety of employees;
 - 2.3.5. Acts and activities that cause or create risks of adverse impacts on the environment;
 - 2.3.6. Acts and activities that condone or acquiesce to unfair or unlawful conduct;

- 2.3.7. Decision-making, acts, and activities by the Company that violate applicable laws and regulations in Mongolia;
- 2.3.8. Unethical acts relating to food safety, public health, safety, and the supply chain;
- 2.3.9. Acts where an authorized officer abuses or intentionally fails to exercise their authority to create advantages for themselves or others, and acts involving corruption, bribery, or conflicts of interest.
- 2.3.10. Acts by contracted workers, suppliers, or business partners of offering or attempting to offer any corruption or bribe to employees or officers of the Company; and
- 2.3.11. Other acts and omissions of a similar nature to the above;
- 2.4. Personal disputes, misunderstandings, and conflicts between individuals or between the Company and individuals of a personal nature shall not fall within the scope of the whistleblowing procedure.
- 2.5. Whistleblowing information shall include the following:
 - 2.5.1. The name and position of the person who committed, omitted, or participated in a violation specified in Article 2.3 of this Procedure;
 - 2.5.2. A detailed description of the circumstances and acts or omissions related to the violation, along with relevant supporting evidence;
 - 2.5.3. The whistleblower's contact information.
- 2.6. When providing information, the whistleblower shall clearly indicate whether their personal information referred to in Article 2.5.3 of this Procedure is to be kept confidential. If confidentiality is requested, the Company shall be obligated not to disclose such information.
- 2.7. A whistleblower may blow the whistle and submit information on behalf of themselves through their representative without disclosing their personal information referred to in Article 2.5.3 of this Procedure.
- 2.8. When submitting information in accordance with Article 2.7 of this Procedure, the representative shall include their own name and contact phone number in the whistleblowing information on behalf of the whistleblower.
- 2.9. A whistleblower may attach to the whistleblowing information a letter containing the grounds for blowing the whistle without disclosing their identity and their personal information. The Ethics Committee shall receive and retain the information and letter, and it shall be prohibited to disclose the whistleblower's letter or information to any other party.

3. RECEIVING, REGISTERING, AND CONDUCTING INVESTIGATION

- 3.1. The whistleblower shall submit information referred to in Article 2.3 of this Procedure in accordance with the form set out in Annex No. 1 of this Procedure to the Ethics Committee www.cumongol.mn/whistleblow via the whistleblowing reception website.
- 3.2. The Ethics Committee shall receive the information submitted by the whistleblower through the website.
- 3.3. The Ethics Committee shall evaluate the submitted information and, where necessary, may request the following additional information from the whistleblower for clarification:
 - 3.3.1. Clarification where the information specified in Article 2.5.2 of this Procedure has not been submitted or is deemed insufficient;
 - 3.3.2. The grounds and purpose for which the whistleblowing information is considered to be in the interests of the Company.
- 3.4. The Ethics Committee shall conduct a relevant investigation into whether any acts or omissions that

have caused or may cause damage to the Company's interests have occurred in accordance with the information, and shall promptly notify the whistleblower of the investigation results. If the whistleblower does not accept the investigation results, they may file a complaint with the Company's Board of Directors.

- 3.5. The Ethics Committee shall not investigate information in the following cases:
- 3.5.1. The whistleblowing is based on obviously false or intentionally defamatory information;
 - 3.5.2. The whistleblowing concerns a matter that has already been investigated, decided upon, and the results of which have been communicated through a whistleblowing notification;
 - 3.5.3. The information submitted is unsupported by evidence and unsubstantiated;
 - 3.5.4. Before the whistleblowing information was received, an investigation into the acts or omissions that caused or may have caused damage to the Company's interests had already commenced or was concluded; or
 - 3.5.5. The whistleblowing concerns matters specified and prohibited in Article 2.4 of this Procedure.
- 3.6. The Ethics Committee shall be obligated to provide the whistleblower with a reasoned response regarding its decision not to investigate the whistleblowing information.
- 3.7. Non-acceptance of the Ethics Committee's decision on a previously investigated and notified matter shall not be deemed grounds under Article 3.5.2 of this Procedure, and such matter may be subject to reconsideration.
- 3.8. The Ethics Committee shall propose cooperation with the whistleblower in cases where the Company's interests are seriously affected and in other cases where necessary. This activity shall be carried out subject to an agreement ensuring full confidentiality of the whistleblower.

4. EXERCISE OF WHISTLEBLOWER RIGHTS

- 4.1. A whistleblower who has provided information in the interests of the Company shall have the right to be free from retaliation, discrimination, coercion, physical and emotional harm, and any act that may cause harm in connection with such disclosure, and the Company shall create conditions for the exercise of this right.
- 4.2. Except where the whistleblower and their representative have consented to the disclosure of their personal information or as otherwise provided by law, the Company shall ensure the confidentiality of such information and ensure that it is not possible to identify the whistleblower.
- 4.3. If the whistleblower and their representative consider that personal information has been disclosed on grounds other than those specified in Article 4.2 of this Procedure, the whistleblower shall have the right to file a complaint with the Board of Directors.
- 4.4. The whistleblower and their representative shall have the right to demand from the Ethics Committee the protective measures set out in Article 7.2 of this Procedure and other necessary measures for the purpose of ensuring their safety.
- 4.5. The whistleblower shall submit a request to the Ethics Committee to receive the advice referred to in Article 7.4.6 of this Procedure, and the Ethics Committee shall take the necessary measures in accordance with such request.
- 4.6. If the whistleblower requests that the fact of receiving legal and psychological advice be kept confidential, the Ethics Committee shall be obligated to maintain such confidentiality.
- 4.7. Any transaction, agreement, or relevant provision of internal labor regulations that obstructs the exercise of the whistleblower's rights or the taking of protective measures upon their request shall be deemed invalid.

- 4.8. The whistleblower may appeal to the ESG Committee of the BOD regarding matters reported to the Ethics Committee.

5. PROHIBITION OF ACTS CAUSING HARM TO WHISTLEBLOWERS

- 5.1. The following acts that cause or may cause harm to a whistleblower in connection with their whistleblowing are prohibited:
- 5.1.1. Demoting, limiting promotion opportunities, imposing disciplinary penalties, dismissing, or demanding voluntary resignation in connection with whistleblowing;
 - 5.1.2. Changing or transferring official duties, workplace, unit, or functions without the whistleblower's consent;
 - 5.1.3. Reducing salary, adversely affecting performance evaluations, or discriminating in the granting of awards and incentives; or
 - 5.1.4. Unlawfully inspecting the whistleblower's work or disclosing the results of such inspections.
- 5.2. If the whistleblower considers that they have been subjected to any of the above prohibited acts, they shall have the right to file a complaint with the Ethics Committee.
- 5.3. The party that has taken any measure specified in Article 5.1 of this Procedure shall have the burden of proving the grounds and necessity of such decision.
- 5.4. If the grounds for the decision are not proven, or if it is established that applicable laws or the Company's internal rules and regulations have been violated, the act that has worsened the whistleblower's legal status shall be stopped, the damage caused shall be remedied, and information on this matter shall be submitted to the BOD.

6. WHISTLEBLOWER LIABILITY

- 6.1. When a whistleblower submits information in the interests of the Company, if such information contains confidential information of the Company or personal nature, the whistleblower shall not be deemed to have breached their professional obligation to maintain confidentiality as set out in the internal labor regulations and other applicable laws and regulations.
- 6.2. If the information provided by the whistleblower is found, as a result of investigation, to be unrelated to the Company's interests and to not constitute a violation of other laws and regulations, there shall be no grounds for holding the whistleblower liable in connection with having provided such information.
- 6.3. In the following cases, the whistleblower shall be held liable in accordance with applicable laws, rules, and regulations:
- 6.3.1. Intentionally disclosing the confidentiality of information during the investigation process, or spreading obviously false information to others;
 - 6.3.2. Blowing the whistle with the aim of creating advantages for themselves or their related parties, and spreading obviously false information that damages the honor, reputation, or business reputation of others or the Company.

7. PROTECTIVE MEASURES

- 7.1. In connection with submitting information in the interests of the Company, if a risk arises of an actual or potential infringement upon the life, health, property, other rights, and freedoms of the whistleblower and their related parties, the whistleblower shall have the right to request the Ethics Committee to take protective measures.
- 7.2. Based on the request of a whistleblower who has provided information on acts or violations that have caused or may cause damage to the Company's interests, the following protective measures may

be taken:

- 7.2.1. Restricting specific acts that may cause harm;
 - 7.2.2. Strictly maintaining the confidentiality of all information related to the whistleblowing;
 - 7.2.3. Concealing, modifying, or removing the whistleblower's name, position, and other factual information;
 - 7.2.4. Prohibiting acts of collecting, disclosing, or discovering information about an anonymous whistleblower;
 - 7.2.5. Where protection is deemed necessary, providing protection to the whistleblower by using a pseudonym.
- 7.3. The Ethics Committee may decline to take protective measures in the following cases:
- 7.3.1. The request for protection was submitted by a person other than the whistleblower or their representative;
 - 7.3.2. The conditions under which investigation is not warranted, as specified in Article 3.5 of this Procedure, have arisen;
 - 7.3.3. A repeated request has been submitted regarding a previously revoked protective measure under unchanged conditions.
- 7.4. The Ethics Committee shall implement the following measures in connection with supporting whistleblowers:
- 7.4.1. Establishing a consolidated database of whistleblowing information;
 - 7.4.2. Cooperating with relevant parties in accordance with whistleblowing information;
 - 7.4.3. Creating conditions for the whistleblower to exercise their rights and organizing protective measures;
 - 7.4.4. Reviewing and deciding on the grounds for granting rewards to whistleblowers;
 - 7.4.5. Recognizing and supporting whistleblowers and conducting training related to how to submit, receive, and resolve whistleblowing information;
 - 7.4.6. Organizing the provision of free legal and psychological advice to whistleblowers.

8. ESTABLISHING A DATABASE

- 8.1. The Ethics Committee shall maintain a consolidated database containing information on whistleblowing information received, registered, transferred, and investigated in the interests of the Company, as well as protective measures taken, revoked, and rewards granted to whistleblowers.
- 8.2. The database shall be maintained and used in accordance with the form set out in Annex No. 1 of this Procedure, and its security shall be ensured.
- 8.3. The Ethics Committee shall consolidate and report information on whistleblowing in the interests of the Company to the BOD by the first quarter of the following year.

9. OTHER PROVISIONS

9.1. Granting Rewards

- 9.1.1. Where the whistleblower's information is established by evidence and confirmed to be accurate, the principle of mandatory reward for the whistleblower shall be observed.
- 9.1.2. In accordance with this Procedure, the matter of granting rewards shall be specifically discussed by the Ethics Committee and resolved on the basis of its presentation to the BOD. Rewards granted by the Company to a whistleblower shall not be granted cumulatively on

the same grounds or cumulatively for the same type of violation.

- 9.1.3. When discussing the matter of rewards, the BOD shall take into account the following conditions:
- a. Where the information disclosed by the whistleblower has prevented the Company from incurring large-scale or greater damage, legal violations, damages not quantifiable in monetary terms, reputational risks, or other equivalent major risks, a monetary reward may be granted to the relevant whistleblower.
 - b. If circumstances arise that do not fall within the cases specified in Article 9.3.1, a non-monetary reward shall be granted to the whistleblower.
 - c. Where the whistleblower is not an employee or officer of the Company, a reward system shall be established depending on the circumstances of the relevant whistleblower.

9.2. Prohibition Provisions

- 9.2.1. It is prohibited for a whistleblower to blow the whistle with the aim of obtaining advantages for themselves or their related parties.
- 9.2.2. It is prohibited for a whistleblower to blow the whistle using obviously false information that damages the honor, reputation, or business reputation of others or the Company.
- 9.2.3. It is prohibited to obstruct whistleblowing in the interests of the Company or to forcibly compel a whistleblower to withdraw their information.
- 9.3. If the acts or omissions of an employee or officer who has violated this Procedure do not constitute a criminal offence, liability shall be imposed in accordance with applicable laws, the Company's internal labor regulations, and the contract concluded with the employee.
- 9.4. If the acts or omissions of an employee or officer who has violated this Procedure constitute a criminal offence, the matter shall be reported to the competent authority and liability shall be imposed in accordance with the Criminal Code or the Law on Violations.

Annex 1.

Whistleblowing Information

Type of Violation:	
Name and position of the person who committed or omitted an act that has caused or may cause damage to the Company's interests:	
Description of the circumstances and acts that have caused or may cause damage to the Company's interests:	
Relevant supporting evidence (video recording, photographs, written records, audio recordings, email correspondence, chat logs, screenshots of messages, etc.):	

Whistleblower Information

Surname:	Affiliated Company:
First Name:	Position:
Phone:	Email:
Whether to keep the whistleblower's information confidential:	<input type="checkbox"/> Yes <input type="checkbox"/> No
Will you submit information through your representative?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If yes, name and contact information of the representative:	

Whistleblower's Name:

Date:

ETHICS COMMITTEE DECISION

Chair of the Ethics Committee:

Members of the Ethics Committee:

Date