

ANTI-BRIBERY PROCEDURE

1. GENERAL PROVISIONS

1.1. These Central Express CVS JSC (“**Company**”) Anti-Bribery Procedure (“**Procedure**”) are established to define the general principles and standards for implementing applicable anti-bribery laws and regulations in the operations of the Company and its subsidiaries, and for conducting operations in compliance with such laws and regulations.

1.2. Scope

All employees of the Company and its subsidiaries shall comply with this Procedure.

1.3. Oversight and Amendments

The Company's Board of Directors (“**BOD**”) Environmental, Social, and Governance Committee shall present this Procedure and any amendments thereto to the BOD for approval as and when deemed necessary, and any amendments shall become effective upon approval by the BOD.

1.4. Terms of the Procedure

In the event of a conflict between this Procedure and the Company's Charter, the Company's Charter shall prevail; and if this Procedure is inconsistent with the laws and regulations of Mongolia, the subsequently enacted 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 the Law on Companies, the Company's Charter, and other legal acts.

1.5. Definitions

Certain terms used in this Procedure shall be understood with the following meanings:

- 1.5.1. “**Bribery**” means the unlawful (i) offering, promising, giving, or granting of a thing of value by one party, and (ii) demanding, obtaining, or receiving of a thing of value by the other party, with the aim of directly or indirectly obtaining or creating an improper advantage for oneself or others, including retaining business, obtaining new business opportunities, or influencing the decisions of authorized persons;
- 1.5.2. “**Corporate Official**” means an employee or officer of any type of organization other than a Government Body (as defined below);
- 1.5.3. “**Third Party**” means an individual or legal entity that has a business relationship with the Company and, in connection with that relationship, enters into any type of interaction with a Government Entity, Public Official, or Private Sector Official on behalf of the Company;
- 1.5.4. “**Family Member**” means a close family member of a public official or corporate official, including spouse, mother, father, siblings, children, and their respective spouses and family members;
- 1.5.5. “**Improper Advantage/Benefit**” means the material and non-material benefit and advantage — including but not limited to being exempted from obligations and liabilities, receiving discounts and incentives, gaining prior knowledge of opportunities, exploiting such opportunities, obtaining or receiving non-public

information, documents, or records ahead of others, and queue-jumping — that accrues to an individual or legal entity through improper means as a result of bribery being offered, given, or promised;

1.5.6. **“Company Representative”** collectively refers to all levels of employees and officers of the Company, and Third Parties, who conduct any activities on behalf of or in connection with the Company;

1.5.7. **“Thing of Value”** includes:

- Cash and non-cash money;
- Electronic money and all equivalent forms of money;
- Shares, securities, monetary cheques, and financial derivatives of any form;
- Gifts;
- Meals, entertainment, travel, recreation, and other equivalent hospitality;
- Covering or subsidizing training costs and providing discounts;
- Business, employment, or investment opportunities;
- Granting scholarships;
- Reducing or writing off loans and debts;
- Voluntary and political donations, assistance, and support;
- Paying or subsidizing medical and treatment costs and fees;
- Membership rights to join a particular circle or organization;

and all other things of value given or received — including but not limited to the above — whether free of charge or at a price lower than publicly offered, through the transfer of financial resources, property, or rights, provision of services, release from obligations, or waiver of rights;

1.5.8. **“Facilitation Payment”** means additional payments — such as supplemental wages, incentives, or gratuities — paid to a Public Official or Company Representative outside of what is prescribed by law and internal regulations, for the purpose of facilitating, expediting, or shortening the time required for specific established Government Entity processes such as state registration, applying for or renewing licenses and permits, obtaining visas, customs clearance, tender and procurement procedures, or to avoid penalties;

1.5.9. **“Government Body”** means legislative, executive, and judicial bodies, local self-governing bodies, any state-owned legal entity, and other equivalent public law organizations, as well as entities to which the powers, authority, and functions of such bodies have been transferred on the basis of law or a public law agreement, and also foreign government bodies and international organizations;

1.5.10. **“Public Official/Officer”** means (i) any person appointed or elected on a permanent or temporary basis to a legislative, executive, or judicial body, whether paid or unpaid, regardless of rank; (ii) any person who performs public functions or provides public services at a government body or state-owned enterprise as defined by domestic law; (iii) any person defined as a public official under foreign law; (iv) any employee of an international organization or a person authorized to act on behalf of such organization; or (v) any employee or officer of a political organization or political party.

1.6. The unit responsible for internal control of the Company shall monitor the implementation of this Procedure, and the Procedure shall take effect from the date of its approval.

1.7. Persons who violate this Procedure shall be held liable in accordance with applicable laws and

regulations, and shall be subject to disciplinary action in accordance with the Company's Internal Labor Regulations.

2. GUIDING PRINCIPLES

- 2.1. Company Representatives are prohibited from participating in any bribery-related activities — including giving or receiving bribes — directly or indirectly in any form.
- 2.2. Company Representatives shall remain free from bribery in all interactions with Government Entities, Public Officials, and Private Sector Officials.

3. ANTI-BRIBERY ACTIVITIES

- 3.1. Company Representatives are prohibited from directly or indirectly giving, promising, or offering items of value to Public Officials or Private Sector Officials for the following purposes:
 - 3.1.1. To influence a public official or corporate official to take action or make decisions within their authority;
 - 3.1.2. To influence a public official or corporate official to take actions or omissions in breach of their duties and responsibilities;
 - 3.1.3. To influence a public official or corporate official to use their authority and positional advantage to influence the actions or decision-making of other public officials and organizations;
 - 3.1.4. To obtain an improper advantage for the purpose of retaining business, obtaining new business opportunities, or any other purpose.
- 3.2. Company Representatives are prohibited from requesting, demanding, or receiving items of value from any party that has a business relationship with the Company in exchange for any activities carried out on behalf of the Company.
- 3.3. Where strictly necessary in a business or professional context, an employee of the Company may, after providing prior notification and obtaining approval in accordance with the procedure, receive gifts of a value within the limits specified in the internal regulations, from any party with a business relationship with the Company, in accordance with applicable laws and regulations and the Company's internal regulations.

4. DEALINGS WITH PUBLIC OFFICIALS

- 4.1. In dealings with government bodies and their officials — including selling goods or providing services to government bodies, implementing cooperation within the framework of corporate social responsibility and to the extent permitted by applicable laws, rules, and regulations, participating in procurement, projects, tenders, and selection processes, registering with government bodies, obtaining rights, permits, and licenses — in all such interactions with Government Entities and their officials — Company Representatives shall remain free from bribery.
- 4.2. Within a business or professional context, when a situation arises where a Company Representative is required to give, offer, or promise items of value to a Public Official or Private Sector Official, the Representative shall give advance written notice to the Company's internal control officer before making such a decision, and the internal control officer shall verify whether the decision complies with applicable laws and internal rules and regulations, and

shall provide a written response indicating approval or refusal.

- 4.3. Promotional items — including gifts, travel, meals, entertainment, hospitality, sponsorship, donations, and assistance — provided to public officials and corporate officials free of charge or at below-market prices solely within a business or professional context for the purpose of promoting, explaining, or introducing the Company's products and services are permitted. Promotional items that are excessively lavish, luxurious, or given on a regular and recurring basis are prohibited.
- 4.4. Where a Government Entity requests that the Company cover costs other than the Public Official's training or program fees, meals, accommodation, and equivalent travel and mission expenses in connection with enrolling a Public Official in a training program or program of an independent organization within a professional context, the Company may accept and pay such costs. In this case, the Company may pay no more than 25 percent of the total training and program fees and costs attributable to a single Public Official.
- 4.5. Company Representatives are prohibited from giving, offering, or promising facilitation payments to Public Officials or Private Sector Officials for using their authority or abusing their authority, position, or status to simplify established procedures and create advantages for the Company.
- 4.6. In urgent situations where not making a facilitation payment would pose a high risk of threat to a person's life, health, or freedom, such payment may be made. In such cases, it shall be accurately reflected in the Company's records and reports.
- 4.7. The Company may establish open and transparent communication with public officials on matters relating to existing and newly enacted laws and regulations in a lawful manner and express its views and positions, in which case it shall be carried out in accordance with the recommendations and instructions of the Company's internal control officer. Establishing contact with members of legislative and executive bodies, local self-governing bodies, and any legal entities or individuals providing consulting services to them for the purpose of influencing their actions or positions through means provided by law shall constitute lobbying activity.
- 4.8. The prior approval of the Company's internal control officer shall not be required for contacting regulatory bodies or public officials on matters such as participating in public meetings and forums, expressing positions through member trade and other non-governmental organizations, filing petitions, lodging inspection-related complaints, or requesting recommendations and instructions within the Company's ordinary business operations.
- 4.9. Regardless of whether activities are related to lobbying, Company Representatives are the Company are prohibited from offering or giving anything of value to a public official for the purpose of obtaining or retaining business opportunities or improper advantages. All lobbying activities shall comply with applicable laws and regulations and internal rules and regulations.
- 4.10. Obtaining licenses and permits from government bodies, and disputes with government bodies. In connection with obtaining licenses and permits or resolving disputes with Government Entities, Company Representatives are prohibited from directly or indirectly offering, promising, giving, or granting to Public Officials — in exchange for advice or services received directly or indirectly from such officials — any facilitation payment or item of value other than payments that have been reviewed and approved in advance by the Company's internal control officer.
- 4.11. Entering into contracts and agreements with Public Officials. In all cases of entering into contracts with Public Officials, the Company Representative responsible for the relevant

matter shall obtain prior written approval from the Company's internal control supervisory officer.

- 4.12. It is prohibited to employ Public Officials concurrently at the Company, and where a former Public Official or their family member is to be employed or engaged on a contractual basis, the recruitment process shall be monitored and verified with supporting evidence to ensure it was conducted in accordance with applicable laws and the Company's internal regulations.
- 4.13. When employing or entering into a contract for services with a current or former public official or their family member, it is prohibited to make an offer exceeding what is assessed under the Company's standard operating procedures or to grant any advantage or special terms.
- 4.14. It is prohibited for the Company to employ or engage on a contractual basis family members of current or former Public Officials for the purpose of improperly influencing such Public Officials — whether currently or formerly employed at a Government Entity that may directly or indirectly provide assistance to the Company — or for the purpose of obtaining improper advantages.

5. THIRD PARTIES

- 5.1. Any Third Party entering into a business relationship with the Company shall assess the risk of violating applicable anti-bribery laws and regulations and determine whether any of the following bribery risk situations (including but not limited to) exist:
 - 5.1.1. Business operations are entirely dependent on a public official, their actions, and decisions;
 - 5.1.2. Has aligned interests with a government body or official considered to be susceptible to bribery;
 - 5.1.3. Has a history of giving or receiving bribes, or operates in a sector with high bribery risk;
 - 5.1.4. Requires payment of incentives, discounts, or other payments exceeding the actual price set by law or established by the market;
 - 5.1.5. Requires payment transfers to an unrelated third country or third party, maintaining no records, or making cash or improper payments;
 - 5.1.6. Refuses to provide guarantees of freedom from bribery and corruption;
 - 5.1.7. The Third Party lacks the experience and resources to perform the proposed work or services;
 - 5.1.8. A government body or public official recommended the Third Party;
 - 5.1.9. Provides unusual incentives or loans to new clients or employees;
 - 5.1.10. Refuses to maintain accounts, records, and ledgers related to business activities connected to the Company.
- 5.2. Third Parties are prohibited from engaging in corrupt acts or omissions, such as giving, offering, or promising anything of value to a public official or corporate official on behalf of the Company for the purpose of obtaining or retaining business opportunities or improper advantages.
- 5.3. An employee of the Company responsible for contracts and agreements with Third Parties shall assume the following obligations:

- 5.3.1. Introduce this Procedure to the Third Party before entering into the contract;
- 5.3.2. If the bribery risk assessment questionnaire identifies any situation that may create legal, regulatory, or reputational risk for the Company, or any high bribery risk situation related to the Third Party, consult with the Company's internal control officer.
- 5.4. Contracts with Third Parties shall include the following provisions:
 - 5.4.1. A representation and warranty by the Third Party to comply with and observe applicable anti-bribery laws and regulations in implementing the contract;
 - 5.4.2. A representation and warranty not to give bribes or engage in corruption for the purpose of obtaining any business or improper advantage;
 - 5.4.3. A provision granting the Company the right to unilaterally terminate the contract and recover incurred damages and costs from the Third Party on an indisputable basis if the Third Party breaches the above commitments.

6. RECORD KEEPING

- 6.1. Things of value provided to public officials and corporate officials in connection with relations governed by this Procedure shall be accurately reflected in the Company's reports and records.

7. REPORTING BRIBERY

- 7.1. Company employees and officers shall be obligated to promptly notify the Company's internal control officer upon learning of or receiving from a Third Party, Public Official, Private Sector Official, or any other party any information or notification related to bribery concerning the Company.
- 7.2. The Company's internal control officer shall immediately verify and investigate any news or information relating to bribery and, in cooperation with Company management and relevant departments and units, shall take appropriate measures in accordance with applicable laws and regulations and the Company's internal regulations.