



ЗАСГИЙН ГАЗРЫН ТОХИРУУЛАГЧ АГЕНТЛАГ
МЭРГЭЖЛИЙН ХЯНАЛТЫН
ЕРӨНХИЙ ГАЗАР

ETHICS

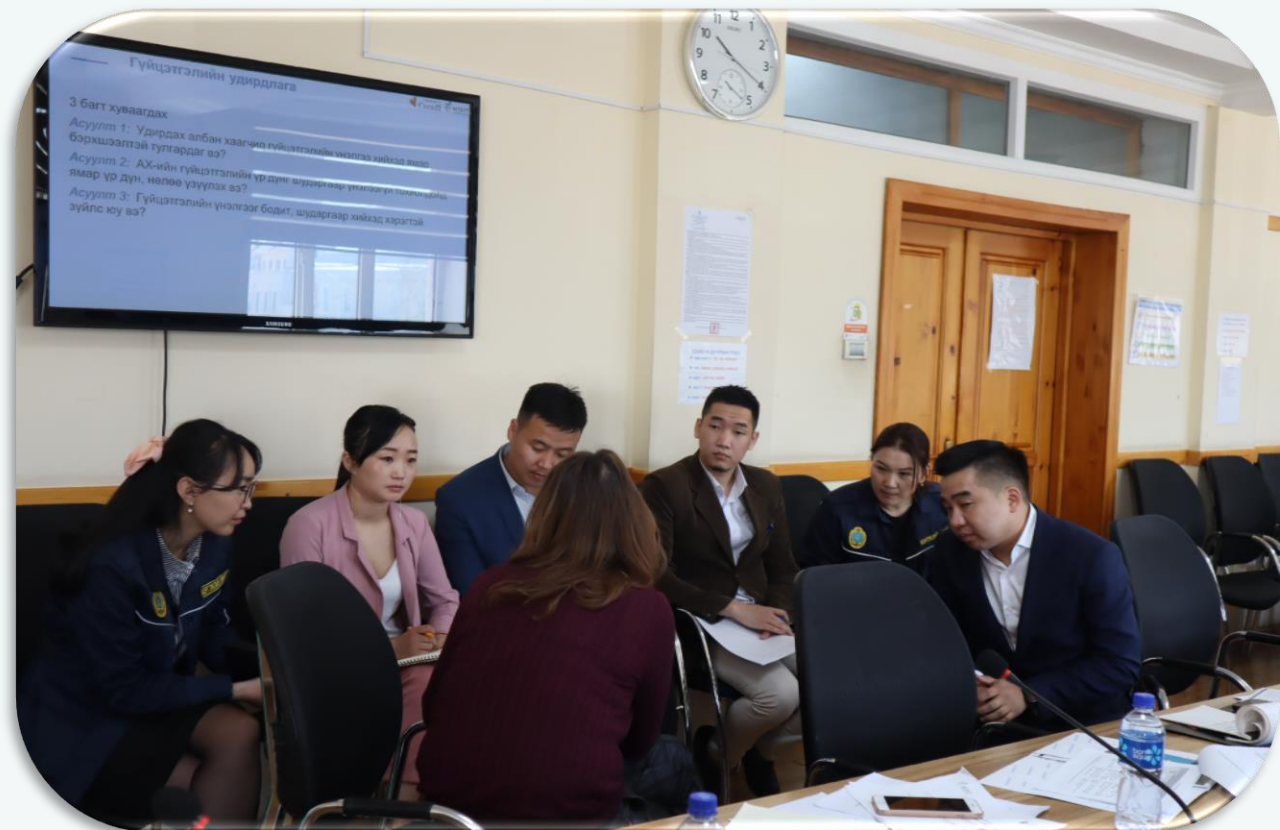
General Agency for Specialized Inspection

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Learning Objectives

Participants will be able to understand:

- Ethics - what?
- The rationale – why?
- Possible ethics violations
- Reporting & investigation
- The legal framework

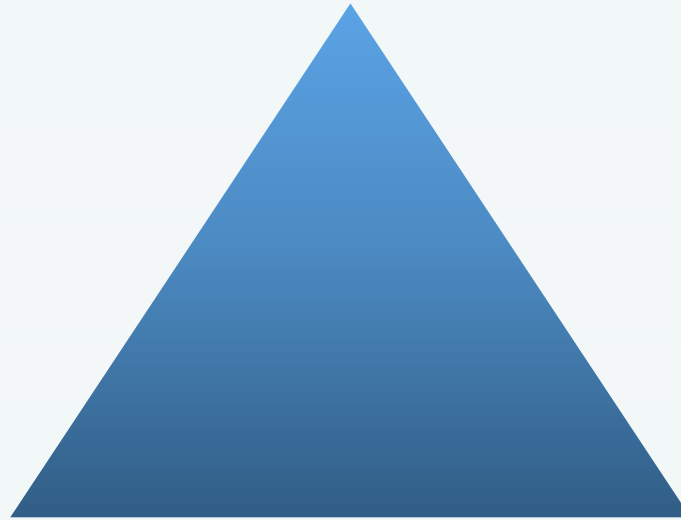


The moral code practiced by and standards that govern the conduct of a person or group of people.

Societal Norms

Legislation:

- The Law on Civil Service
- The Labor Law amendment
- Govt` Resolution No. 33 on Ethical Code of Conduct for Public Administration and Public Service Category Civil Servants
- Bill on Ethics and Discipline of Civil Servants



Policies:

- Respect
- Discrimination
- Anti-Harassment

Gov't Values: Integrity, Efficiency, Accountability, Free from conflict of interest, Respect & Communication, Planning & Time Management, Empathy

Ethical considerations

Questions that we should ask ourselves when confronted with a potential ethical decision:

- Is it legal?
- Are my actions consistent with Policy intent?
- Will there be any direct or indirect negative consequences for GASI?
- What would my family, friends or neighbors think of my actions?
- Would I prefer to keep this secret?
- Would I want my actions reported on the front page of the newspaper?



Why is Ethical behavioral important to?

- The Government (Group No. 1)
- The GASI (Group No. 2)
- Employees (Group No. 3)
- Clients/citizens (Group No. 4)



Advantages to the Government

- C** Commitment to improve transparency;
- I** Increases trust of citizens;
- P** Discourages unethical conduct;
- U** Upholds civil service values;
- I** Improves standing in Global corruption index; and
- A** Attracts investment.



Global Corruption Index

69% of people surveyed globally think corruption is a problem.

Index 2020 Results table




Search

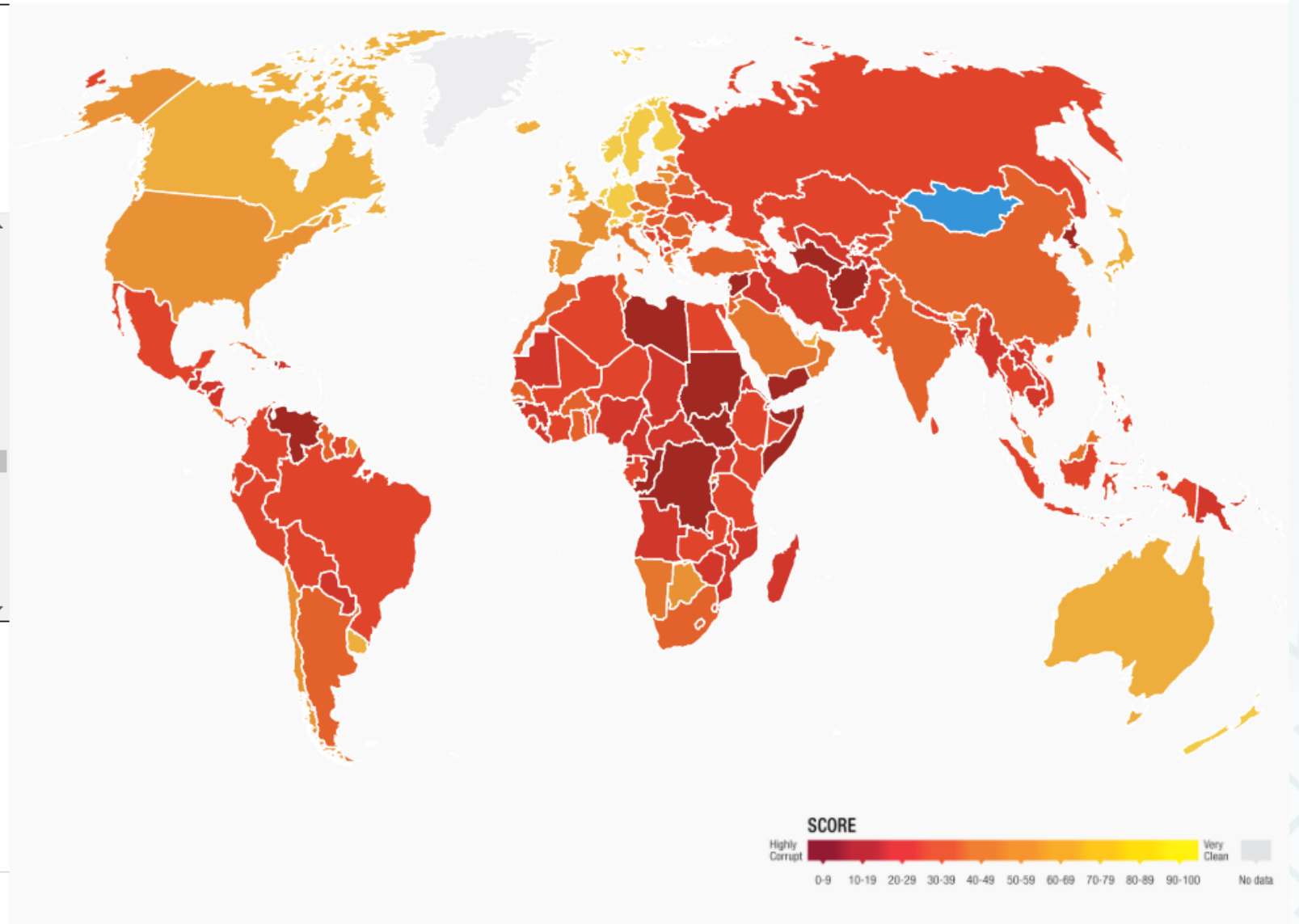
Score	Country	Rank
36	El Salvador	104
35	Bosnia and Herzegovina	111
35	Panama	111
35	Mongolia	111
35	North Macedonia	111
34	Philippines	115
34	Moldova	115
33	Egypt	117

ASIA PACIFIC

MONGOLIA

Score	Rank	Score change
35/100	111/180	↓ -1 since 2012

[Read more](#)   



Advantages to the GASI

- A** Achieves compliance with legislation;
- I** Improves reputation;
- P** Promotes a positive work environment;
- P** Promotes gender equity;
- R** Reduces organizational risk;
- I** Improves efficiency;
- E** Enhances safety;
- P** Promotes respect in the workplace;
- M** Motivates collaboration; and
- E** Employer of choice.



Large Corporate experience

- Nortel accounted for more than a third of the total valuation of all companies listed on the Toronto Stock Exchange (TSX), employing 94,500 people worldwide.
- Nortel lied about their sales. In 2009, the stock declined by 79%. The company declared bankruptcy - largest in Canadian history leaving pensioners, shareholders and former employees with enormous losses.
- Enron lied about their financial results and Arthur Anderson, its accounting firm approved the results. In 2001, the company declared bankruptcy and Arthur Andersen – then one of the five largest accountancy partnerships in the world – was dissolved. Enron was cited as the biggest audit failure in history.

Advantages to Employees

- P** Provides a guide for conduct;
- C** Creates a positive work environment;
- C** Consistent with employee values;
- C** Creates trust amongst employees;
- P** Promotes respect amongst employees;
- E** Enhances collaboration;
- P** Promotes personal accountability; and
- E** Encourages good judgement.



Advantages to Clients/Citizens

E Enhances our credibility promoting confidence;

P Promotes efficiency and innovation; and

E Enhances public trust that support our inspection effort on enforcement of legislations for citizens to live in a healthy and safe environment, use quality products and services, and create an environment conducive to societal and business development.



Message from the President and CEO regarding the Redpath Code of Conduct

At Redpath, we have **high expectations for our behavior as a company. Our corporate behavior is the sum of the behaviors of all of our employees**, and, in this regard, it is important that we have a document that outlines how each of us will strive to conduct ourselves at all times. **We are committed to acting ethically in all dealings** with all of our fellow employees, our clients, our suppliers, and all stakeholders in our business. It is only by conducting ourselves with the **utmost integrity that we will create long term sustainable value** for Redpath.

The Code of Conduct is not expected to cover every conceivable situation that we may face but rather to provide a moral compass to help guide our actions

The Code has been developed to reflect the values we have as a company, and we are all expected to comply not only with the letter of the Code, but the spirit of the Code as well. **We strive to be a world class company, and the foundation of any world class organization is a culture of integrity.**

Many of our clients chose to do business with us because they know Redpath behaves in a responsible and ethical manner and that we respect all those we come into contact with. Thank you for your continued support of compliance and ethics at Redpath, taking responsibility for living our values, and protecting and enhancing **the excellent reputation** that our company has earned doing business around the world since 1962.



Steppe Gold Ltd.

Standards of Good Professional Ethics: Steppe intends that its **good reputation** shall be maintained and accordingly, all of **Steppe's activities shall be carried out ethically and with honesty and integrity**, in the expectation that these activities will become a matter of public knowledge. Anything less is unacceptable and shall be treated as a serious breach of duty.

Discrimination/harassment

POLL

Mining sector - discrimination, harassment



All employees have a right to work in an environment free from all forms of harassment.



Respect is central to a harmonious workplace, where the rights of employees are upheld and where their dignity is affirmed, free of intimidation, discrimination or coercion of any kind.

RioTinto

We recognize and respect diverse cultures, communities and points of view. We treat each other with fairness and dignity, to make the most of everyone's contribution.

Misuse of organization assets



Mining sector - misuse of organization assets



The Company's assets must not be misappropriated for personal use



Incidental and occasional personal use is permitted, but never for personal gain or any improper purpose. You may not access, send or download any information that could be insulting or offensive to another person, such as sexually explicit material or jokes, unwelcome propositions, ethnic or racial slurs, or any other message that could be viewed as harassment



We must never engage in inappropriate use of SouthGobi electronic resources.... Incidental personal use of SouthGobi electronic resources is permitted if it is moderate and does not interfere with work duties. Abuse of this privilege is regarded as misconduct.



Erdene's assets may only be used for legitimate business purposes and may never be used for illegal purposes. A director, officer or employee should not use Erdene property or resources for any personal benefit or the personal benefit of anyone else.

Intellectual Property – inventions, trade secrets etc.





Intellectual Property Copyrights, trademarks, designs, inventions, improvements, discoveries and any other form of intellectual property (such as protocols, procedures, technical processes, research methods, etc.) created or modified during the course of our relationship with Redpath remain the exclusive property of Redpath. In addition, intellectual property developed outside of the relationship with Redpath belongs to Redpath if its development arises from confidential information acquired in the course of our relationship with Redpath. In such instances, we may be required to sign documents showing Redpath ownership.



... prohibiting the unauthorized use, reproduction, or distribution of any third party's trade secrets, copyrighted information or confidential information...



The Bill on Ethics and Discipline of Civil Servants

10.3.5. Not to reveal any state or organizational secret that was obtained over the course of employment.

Confidentiality & failure to keep proper records



Mining sector - Confidentiality & failure to keep proper records

it is of critical importance that the Company's filings with the securities commissions and other relevant regulatory authorities be accurate and timely.



All Redpath business transactions must therefore be fully and fairly recorded in accordance with Redpath's accounting principles and other appropriate requirements. Improper or fraudulent documentation or reporting is illegal



Potential code violations – gifts & entertainment



Mining sector – gifts & entertainment



The Company prohibits **the giving of inducements**, including gifts and entertainment, to government officials on **a scale** that might be perceived as creating an obligation on that official. When considering the scale of the inducement, Company personnel should consider **the frequency** with which such expenses are incurred for a particular official. Modest costs frequently incurred can, when aggregated, amount to lavish and potentially improper payments. Modest gifts that are customary may sometimes be appropriate. The approval of the VP Legal must be obtained for any gift to a government official in excess of **US\$250** or the amount permitted under the laws of the jurisdiction in which the gift is being given, whichever is lower.



Gifts and entertainment given and received as **a reward or encouragement for preferential treatment** are not allowed. In certain circumstances, **the giving and receiving of modest gifts and entertainment is perfectly acceptable. A business meal**, for example, can provide a relaxed way of exchanging information. Nonetheless, **depending on their size, frequency, and the circumstances** in which they are given, they may constitute **bribes, political payments or undue influence**. The key test we must apply is whether gifts or entertainment could **be intended or interpreted**, as a reward or encouragement for a favour or preferential treatment. If the answer is yes, they are prohibited under SouthGobi policy. Exchanges of gifts and entertainment, including the payment of travel expenses, must be in accordance with SouthGobi's Business integrity guidance . **In all circumstances, every action must comply with local laws**. If you are unsure as to the appropriateness of any gift or entertainment, seek the advice of SouthGobi Senior Management.

Reporting & Investigating

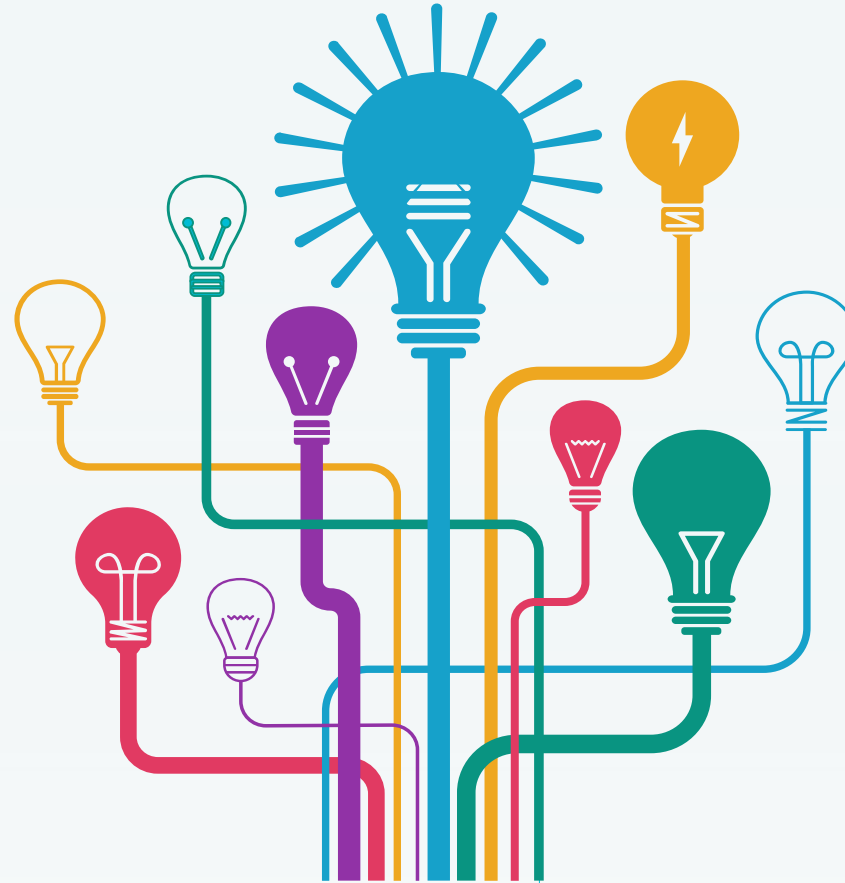
- Ensure you understand the situation;
- Identify behavioral concerns;
- If comfortable, speak to the person involved. Ask them to stop;
- Report the concern to your Manager, Manager's boss or Human Resources;
- Manager, Manager's boss or Human Resources investigates the concern;
- Participate in the investigation responding to questions;
- Investigator makes a determination and recommends action;
- Action is approved & implemented; and
- Keep your concerns confidential.

Personal Accountability

Be a role model

Demonstrate ethical behaviors

Educate yourself and others



Avoid frivolous or vexatious issues

Report unethical behavior directly

GASI accountability

- Take reports seriously;
- Maintain confidentiality to extent possible;
- Investigate complaints (from employees, community, and suppliers);
- Take appropriate action: education, apologies, discipline;
- Ensure there is no retaliation;
- Protect whistleblower from retaliation;
- Annual analysis of complaints;
- Leadership accountability;
 - Model the way and set expectations
 - Challenge themselves and others to act ethically
 - Educate employees
 - Enforce and encourage ethical behavior
- Promote GASI as an ethical organization by operating in a transparent manner and addressing public complaints.

Legal Framework



- To enforce laws, culture, rules and guidelines.
- To provide fair and reliable information.
- To keep personal information confidential.
- To use public property correctly, neatly and with care.
- To avoid personal use of public property.
- To avoid conflicts of interest.
- To treat citizens and clients.
- To avoid influence from political parties, coalitions and movements.
- To take action regarding ethical misconduct of a civil servant.
- Prohibits bribery, misuse of power & violations of law.
- Prohibits discrimination.
- Prohibits harassment.
- Prohibits visiting casinos while abroad.
- Prohibits assigning illegal tasks.

Legal Framework continued.

1. Government resolution No.33 Ethical Code of Conduct for Public Administration and Public Service Category Civil Servants

- *Required to establish an Ethics and Discipline Council comprised of 3 – 7 members for organizations with more than 25 employees.*
- *Receives, Investigates & Resolves complaints.*
- *Reports to Ethics Committee each January.*

2. Bill on Ethics and Disciplines of Civil Servants (draft for 2024)

- *Develops ethical standards.*
- *Provides training & education.*
- *Complaint investigations, resolution and actions.*
- *Reporting to government and public.*
- *Discipline requirements*
 - *Apology to colleague or public.*
 - *Salary reduction of up to 6 months or Demotion.*
 - *Dismissal.*



Legal Framework continued.

The Labour Law Amendment (effective from Jan 1, 2022)



- Prohibits discrimination in employment & labour relations.
- Prohibits sexual motives without consent.
- Prohibits gifts from a job applicant.
- Filing of complaints with management, the National Human Rights Commission or the courts.
- Provides for disciplinary action.
- Requires employers to investigate and resolve complaints.

- The ethics of public service is (should be) based on five basic virtues; **fairness, transparency, responsibility, efficiency and no conflict of interest.**
- “Public officials and employees shall not solicit or accept, directly or indirectly, any gift, gratuity, favor, entertainment, loan or anything of monetary value from any person in the course of their official duties or in connection with any operation being regulated by, or any transaction which may be affected by ...”
- **Public servants must work within the laws of Canada and maintain the tradition of the political neutrality of the Public Service.**
- Public servants shall endeavor to ensure the proper, effective and efficient use of public money.
- In the Public Service, how ends are achieved should be as important as the achievements themselves.
- **Progressive Discipline**
 - I. Education
 - II. Verbal Warning
 - III. Written Warning
 - IV. Suspension
 - V. Discharge

VISION

***THE GASI BECOMES A ROLE MODEL
FOR ETHICAL BEHAVIOR
&
A POSITIVE WORK ENVIRONMENT***



Mongolia:
Enhancing Resource
Management through
Institutional Transformation

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