

TI-MONGOLIA CODE OF CONDUCT

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| Policy owner: | Executive Director of TI-Mongolia |  |
| Approved by: | Board of TI-Mongolia | |
| Status: | Approved | |
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I. OVERVIEW

1. Introduction

This Code of Conduct for the staff of TI-Mongolia is based on the “TI-Mongolia’s Umbrella Statement - Vision, Mission, Values, and Guiding Principles” and aligns with the “TI-Mongolia’s Conflict of Interest Policy.”

While the Umbrella Statement provides a firm ethical framework for our organization, an individual code of ethics reflects the specific needs and aspirations within our organization.

With this understanding, TI-Mongolia—through a process involving the entire staff—has developed the following Code of Conduct to guide its employees in their day-to-day work, interactions, and decision-making. The Code of Conduct was first approved by the Board of Directors on 04.02.2003.

The employees of TI-Mongolia commit to upholding high standards of integrity and accountability, acting according to the core values and guiding principles of TI-Mongolia, and promoting these standards and principles. TI-Mongolia staff are aware that they have a special role in promoting the organization and its ideals to other stakeholders.

The Code is a living document, and its value to TI-Mongolia lies in its ability to foster a culture of integrity.

2. Scope of TI-Mongolia's Code of Conduct

The Practical Guidelines for TI-Mongolia have been developed for both staff as well as advisors regardless of their location. Those working with TI-Mongolia as volunteers or as paid consultants are expected to observe the spirit of this Code.

3. General Principles of TI-Mongolia

Our Vision

Our vision is a country free of corruption, enabling justice, equality, and integrity at all levels of Mongolian society, for current and future generations.

Our Mission

Our mission is to combat corruption for the people of Mongolia by promoting integrity, transparency, accountability, and no impunity and by collaborating with individuals and institutions from all sectors and at all levels of society.

Our Values

- Transparency
- Accountability
- Integrity
- Solidarity
- Courage
- Justice
- Democracy
- Leadership
- Respect

Our Guiding Principles

- As coalition builders, we will work cooperatively with all individuals and groups, with for-profit and non-profit corporations and organizations, and with governments and international bodies committed to the fight against corruption, subject only to the policies and priorities set by our governing bodies.
- We are dedicated to maintaining openness, honesty, and accountability in all of our working relationships and with each other.
- We will remain democratic, politically non-partisan and non-sectarian in our work.
- We will condemn bribery and corruption vigorously wherever it has been identified, although, as an organization, we do not seek to expose individual cases of corruption.
- The positions we take will be based on sound, objective, and professional analyses and high standards of research.
- We will only accept funding that does not compromise our ability to address issues freely, thoroughly, and objectively.
- We will provide accurate and timely reports of our activities to our stakeholders.
- We will respect and advocate for fundamental human rights and freedoms.
- We are committed to cooperating with the Transparency International Secretariat and national chapters worldwide.

- We will not act in any way that might prejudice the interests of the Transparency International movement as a whole.
- We recognize that the credibility and effectiveness of the movement is dependent on maintaining a reputation for independence and integrity and will not threaten this reputation with any of our actions.
- We will strive for balanced and diverse representation on our governing body and in our workforce.

4. Practical Guidelines

4.1. Staff Relations

- 1) We will treat each other and those with whom we work with respect and consideration, being sensitive to our diversity, including in terms of cultural background, gender; region; religion; disability; family status; sexual orientation, etc.
- 2) We will communicate and consult with each other openly and collegially and in a manner that assists each of us to fulfil our duties and responsibilities faithfully and efficiently.
- 3) We will respect the privacy and private lives of our colleagues when dealing with personal information.
- 4) We ensure adequate consultation with any staff member before making any decision, which may impact upon that staff member.

4.2. Personal Integrity

4.2.1. Conflicts of Interest

In our work, conflict may arise between our personal interests and the interests of TI-Mongolia, the global movement, or other stakeholders. We will disclose such conflict and resolve it in a transparent manner, in the interest of TI-Mongolia, TI international, and the international movement. The following paragraph is based on the general policy set out in the TI-Mongolia Policy on Conflict of Interest and spells out in detail the obligations of TI-Mongolia employees in regard to this policy.

4.2.2. Staff Recruitment / Non-preferential Treatment of Family and Friends

Appointments to all positions will be made on merit, regardless of gender, region, religion, disability, family status, sexual orientation, etc. We are committed to open, fair, and transparent appointment, recruitment, hiring, and procurement procedures and practice.

- 1) Family members, and friends and organizations with which we or our families or friends are associated, will not be accorded preferential treatment.
- 2) If hiring or contracting with members of the immediate families of TI-Mongolia staff or the Board of Directors, that is a partner, parent, child, or sibling, we will follow

carefully the guidelines set out in the recruitment and contracting policies to ensure non-preferential treatment.

- 3) To manage potential conflicts of interest, we will disclose such connections with potential applicants or candidates of whom we are aware. We will recuse ourselves from any recruitment or contracting process where we have a conflict of interest. We will ask shortlisted candidates to declare such relations at TI-Mongolia or with the Board of Directors. We will not allow situations in which close family relatives or partners are in a direct reporting relationship to one another.

4.2.3. Anti-corruption

We require integrity and fair practices in all aspects of our activities, and we expect the same standards of those with whom we have relationships.

We do not tolerate corruption and prohibit bribery in any form, whether direct or indirect. This includes facilitation payments, which are bribes and must not be made.

4.2.4. Gifts and Entertainment

There are a variety of customs concerning the giving and receiving of gifts in different cultures. As the acceptance of a gift may appear to create an obligation, we will avoid giving or accepting gifts, favors, and gratuities in connection with official duties, unless these are gifts of minor value and within normal limits up to 100.000 (One Hundred Thousand) Mongolian Tugrik, as required by the following policies:

- 1) We will not accept directly or indirectly any discount, gift, entertainment¹, favors, or advantages, include all services to which we have no claim and which may enhance our economic, legal, or personal circumstances (all referred to as gifts hereafter), unless these are small gifts of up to 100.000 (One Hundred Thousand) Mongolian Tugrik. The same applies for third parties, such as spouse, children or other close relatives, where the staff member is aware of this.
- 2) Invitations to work-related meals are regarded as small gifts even if they exceed the set limit of 100.000 (One Hundred Thousand) Mongolian Tugrik, as long as they take place in an appropriate and professional framework. To ensure transparency, we will notify the Executive Director, or in his/her case, the Chairperson if we are frequently invited to work-related meals or if work-related meals are frequently covered by TI-Mongolia.
- 3) We will not accept any gifts that may influence or be perceived to influence the exercise of our function, or the performance of our duties or our judgement. The same applies for third parties, such as spouse, children or other close relatives,

¹ *Invitations to dinner, cultural events, tourist visits, etc.*

where the staff member is aware of this.

- 4) All gifts between the value of 100.000 (One Hundred Thousand) Mongolian Tugrik and 200.000 (Two Hundred Thousand) Mongolian Tugrik will be registered as provided in section 5 of Article 4.2.4. All gifts from a value of 200.000 (Two Hundred Thousand) Mongolian Tugrik or more will be refused. In special cases, where the rules of courtesy require the acceptance of a gift above that value, an approval by the Executive Director, or in his/her case by the Chairperson, is required. In addition, the gift will be registered as provided in section 5 of Article 4.2.4.
- 5) Registration Process: All gifts will be reported to the Board of Directors and recorded on a document managed by the Board of Directors that is available to all TI-Mongolia staff members. Registered gifts cannot be kept for private use but shall be used jointly within the organization or provided for humanitarian purposes. Private use can only be approved in exceptional cases, where a staff member received a special honor or memory. In such cases, the reasons for private use have to be documented by the Chairperson and the Ethics Council shall be informed.
- 6) We will only give gifts of a value up to 100.000 (One Hundred Thousand) Mongolian Tugrik as an act of courtesy and may grant personal advantages only to the extent that may not influence or be perceived to influence integrity, may be perceived as improper or as a binding obligation.
- 7) Extending invitations to business meals and events are considered small gifts even if they exceed the set limit of 100.000 (One Hundred Thousand) Mongolian Tugrik per person and year, as long as they take place in an appropriate and professional framework.

4.2.5. Travel and TI Property

- 1) Official travel undertaken by TI-Mongolia employees will be directly related to the work of TI-Mongolia and will be undertaken only when necessary. Only economical and bona fide travel expenses will be reimbursed. Only economy airfare will be paid, unless otherwise decided by the Executive Director in accordance with guidelines set by the Board of Directors.
- 2) We will ensure that TI-Mongolia's resources will be used effectively. Assets under our control will be used for no purpose other than for the advancement of TI-Mongolia's objectives.
- 3) When private travel is added onto TI-Mongolia related travel, we will notify the Executive Director before the trip and will meet any extra costs that this may entail.

4.2.6. Private Activities and Private Property

- 1) We will not engage in any activity or transactions or acquire any position or function, whether paid or unpaid, that is incompatible with or detracts from the proper

performance of our duties, and that may bring TI-Mongolia or the whole TI movement into disrepute.

- 2) We will so arrange our private affairs as not to engage in any activity that might impair the credibility of TI-Mongolia by giving the impression that TI-Mongolia is fostering individuals, public, or private institutions whose behavior is perceived as not being in accordance with TI-Mongolia's values.
- 3) We will not use TI-Mongolia business relationships to solicit or obtain favors or improper benefits in private life.
- 4) We will not allow our political affiliations and/or activities to unduly influence or interfere with the political neutrality that is the hallmark of the TI movement.

4.2.7. Remuneration

Where we receive any remuneration for public speaking, writing for a publication or a media appearance, and TI organizational information is involved or the appearance is a result of the individual's employment or association with TI-Mongolia, then the remuneration will be paid directly to TI-Mongolia. However, the Executive Director may decide to forward such an honorarium, partly or entirely, to the respective staff member.

4.2.8. Post-Employment

We will not allow our actions and decisions in the course of our work to be improperly influenced by the prospect of future employment with others.

4.2.9. Transparency and Confidentiality

- 1) We will be as open as possible about all decisions and actions we take, taking into account the need for confidentiality in some situations.
- 2) We will treat information obtained in the service of TI-Mongolia with confidentiality, when its nature calls for it or when this is explicitly requested and will not use any such information or materials to further a private interest. This obligation continues after the staff's separation from TI-Mongolia.

4.3. Financial Transparency

- 1) We will provide and publish audited financial statements in easily accessible form. Financial reports will be provided and published as appropriate.
- 2) We will publish annually our sources of funding exceeding MNT 20.000.000 (Twenty million) Mongolian Tugrik and account accurately and promptly to donors in accordance with the terms of their grants.

4.4. Financial Independence

We will act in line with the Board-approved TI-Mongolia Donations Policy and will not accept funds that might impair the independence or reputation of the organization to pursue its mission. To this end, TI-Mongolia will:

- 1) Accept resources only from donors who share our anti-corruption, transparency, and integrity objectives;
- 2) Seek a balanced distribution between resources obtained from public sector, private sector, foundations and charities, and contributions from individuals;
- 3) Seek a multitude of donors in any aforementioned category;
- 4) Not accept resources granted under condition or structured such that TI-Mongolia refrains from independent action, pursues activities inconsistent with its mission, or refrains from pursuing activities consistent with its mission.

4.5. Environmental Responsibility

We are committed to reducing the environmental impact of TI-Mongolia, within all our operations and conduct. We will strive to integrate and apply environmental values into our decision-making processes and in our relationships with external partners and the movement.

II. IMPLEMENTATION

1. Getting familiar with the Code

- 1) TI-Mongolia management will actively encourage an internal dialogue on ethics, provide guidance for staff and ensure that internal systems, policies, and procedures are consistent with this Code.
- 2) Copies of the Code will be provided to each staff member and published on our web site.
- 3) The Code will be annexed to all contracts of employment and signed along with it.
- 4) There will be an annual review of compliance with the Code and evaluation of its impact on the culture of integrity at TI-Mongolia. The review will be conducted by the TI-Mongolia's Ethics Council (see II.3).
- 5) Periodic meetings with all TI-Mongolia staff members will provide a forum of discussion and review of the impact of the code.

2. Raising an Issue / Whistleblower Protection

- 1) Any concerns about an interpretation, application or suspected violation of the Code that staff or other stakeholders are not comfortable raising directly with staff concerned should be brought to the attention of the Ethics Council (see below).
- 2) Concerns may be raised in person or email through established secure and confidential mechanisms.
- 3) No one shall be discriminated against or disciplined or reprimanded for reporting concerns or requesting guidance concerning the TI-Mongolia Code of Conduct whether or not the concerns are established as valid or substantiated.

3. TI-Mongolia Ethics Council

The Ethics Council shall consist of two members who are elected by TI-Mongolia staff for one year and who are eligible for re-election for a maximum of two further terms. Members of the Board of Directors, the Executive Director, the Co-Managing Director, and TI-Mongolia staff members are not eligible to be elected to the Ethics Council. The Board of Directors shall debate and decide on conclusions or recommendations of the Ethics Council.

The Ethics Council shall in relation to this Code:

- Receive ethics training at the beginning of their term;
- Keep the effectiveness of the Code under review;
- Facilitate training and other ethics related activities;
- Maintain a dialogue and convene at least once a year with the Board of Directors to review the work of the Ethics Council;
- Address issues or claims raised by TI-Mongolia staff or other stakeholders. To this end:
 - In meetings of the Ethics Council, members of the Council will not disclose the identity of any person who has made a confidential report.
 - If considering a specific case, the Ethics Council shall agree to a third member on a case-by-case basis, who shall be external to TI-Mongolia. Decisions are made by majority vote.
 - Upon such a request the Ethics Council shall convene promptly, review the issues raised and claims made and discuss these matters with the persons involved, except for persons having made an anonymous report. In such discussions, the Ethics Council will maintain the confidentiality of any previous discussions held on a confidential basis unless the persons involved waive confidentiality.
 - The Ethics Council shall reach a conclusion and make a written recommendation to all persons involved and, as appropriate, to TI-Mongolia staff, the Executive Director, the Co-Managing Director, the Chair and Vice-Chair of the Board of Directors and the Board of Directors.
 - If a Council member is her/himself involved in a suspected violation of the Code, s/he shall not be involved in the review of the case. A replacement will be co-opted by the remaining members.

The Ethics Council will not deal with cases involving personnel issues, which have no ethical implications.

4. Amendments

The Code shall be reviewed regularly. Amendments to the Code shall be discussed with all stakeholders. Final changes must be agreed between TI-Mongolia Management and TI-Mongolia staff and must be endorsed by the TI-Mongolia's Board of Directors.

Date _____

Name _____

Signature _____