

Mongolia EITI Annual Progress Report

2019

Mongolia EITI National Council, Working group and Secretariat

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Content

One. General assessment of activities

The major highlight of 2018 was the fact that Mongolia EITI was recognized as country, which made satisfactory progress of EITI standard. The main objective of 2019 has been a consolidation of achieved level, for which it was focused on laying down relevant legal foundation.

Mr.M. Robinson, newly appointed executive director of EITI International Secretariat paid visit to Mongolia in May, met all representatives of Stakeholders, aquinted with achievements in the field, and defined directions of further cooperation.

The main product of transparency, which is Mongolia EITI 2018 Report was produced in timely manner, has become a public domain.

1490 mineral license and petroleum contract holding companies and Government on receipt from 2089 companies reported for EITI electronically, Mongolia EITI 2018 Report was produced covering 202 leading companies of Mongolia in the sector. Companies engaged in extractive industries disclosed again new data about used water and disposal of wastes.

The majority of planned activities for 2019 in Mongolia EITI Beneficial ownership transparency Road Map 2020 have been implemented together with EITI International Secretariat, another round table of Government relevant officials and High ranking Parliament and Government consultation of Beneficial ownership, and relevant introduction materials were convered to memers of Parliament.

In order to insure updating Open Contract portal, which was created by funds of Open Society forum, activities were taken by stakeholders like Ministry of Mining and Heavy industries, as result more 280 Contracts have been supplemented with original PDF and converted text, official launch of the site had been organized, a training for local authourities how to upload signed contracts had been organized ath the same time.

A legal working group to develop a bill on transparency in mineral resources sector was established at the Ministry of Mining and Heavy Industries, representatives of Government, Civil Society and Company have worked together, and main objective of 2020 remains passing this bill.

1.1. Result, impact and progress of EITI in Mongolia

1. EITI reporting remains as a real illustration of accountability of Companies is increasing.

For 2006 the number of companies, which was only 64, and this figure has reached 1490 for 2018, and increased 23 times. This is an evidence about increase of number of accountable and responsible companies.

2. EITI reporting reveals an increase of accountability and leadership of Government, which reports without any obstacles.

The Government of Mongolia produced EITI, first time for 2006, which covered revenues of extractive industries from 134 companies, recently produced the report for 2017, which is covering revenues from 2089 companies. It is worth to note that Government has being produced EITI reports on revenues for past consecutive 6 years, covering almost companies having mineral licences. The number of companies presented in the Government has increased 15 times since 2006. This fact gives all ground to consider that accountability of the Government is increasing.

3. Availability of real information has increased, as EITI reporting has become electronic.

Companies and Government have reported in "paper" between 2006-2013, and since 2014 both are producing electronic EITI reports, which lead to saving valuable time, resources and papers of both Government and Companies.

4. Knowledge and capacity of the Government, Companies and Civil society have increased and upgraded.

The capacity of Triparties have increased, as result annual reports have been produced in timely manner, a year before EITI bench timeline, and debated.

5. Donations handed to central and local state organizations, which are not disclosed previously are now disclosed since 2007.

Parliament and Government of Mongolia are taking measures to regulate issues of messy donations and assistances through relevant legislative acts. In 2010 a Financial Ministerial Order No.45, in 2011 a Budget law, and its art. 25, and in 2012 a law on the prevention of conflict of interest and regulation of public and private interests in public service, and its art.17.1, 17.4 have been adopted and regulate issues related to donations, which are present great progress in this aspect.

6. Information on natural rehabilitation work and relevant deposits are disclosed on annual basis. Starting 2017 Report, companies are disclosing used water and disposal of waste.¹

Mongolia is disclosing natural rehabilitation work since 2007 every year, used water and disposal of waste, since 2017, which are not in the EITI standard and is implementing this very special requirement, which can be considered beyond EITI standard.

7. Subnational EITI branches are established in rural areas and capital cities and give opportunity to increase communication between companies and local areas.

¹ Mongolia EITI 2018 report- 81 companies reported on used water and 49 companies reported on disposal of waste.

Mongolia has implemented many activities of good practice in rural cooperation, there is one real illustration, that is now there are functioning Subnational EITI councils in 21 aimags and 12 soums, capital city and 1 district.

8. There are some cases that EITI report and its information was used to resolve some constructive discussion.

There was discussion over whether Boroo gold company has paid any tax or not, so EITI report was used as reference tool to settle this dispute. Another case of Energy Resource² company, that used EITI data in their efforts for better understanding of companyis activities.

Although, Mongolia is implementing EITI more than 10 years and considered as one of leading countries at global level, transparency law in mineral resources sector is most needed to make success sustainable, transparency as daily routine work, for which passing bills in this regard remains as priority.

2019 had evidenced as blow to Mongolia EITI secretariat funding, and many activites have not been implemented.

However, Cabinet Secretariat, MMHI and all stakeholders have cooperated and took actions to resolve the issue, as result Mongolia EITI 2018 Reconcilation Report is produced in timely manner.

² Mongolian Mining Journal, 2018 – November Edition

1.2 Core activities in 2019

EITI Reporting for 2018 by Companies and Government

Mongolia EITI organized EITI reporting for 2018 by Companies and Government as work plan specified.

As a result, totally 1491 mineral license and petroleum contract holding companies (792 companies with exploration license, 687 companies with production license, 12 companies with petroleum production sharing agreement) produced reports and Government entities like 1 ministry, 6 agencies, gubernatorial offices of 13 aimags, capital city and 8 districts reported on revenues from 1986 companies electronically.

During the Reconciliation work, 2 organizations of Parliament, 4 ministries, 9 agencies, 8 aimags and 2 districts have provided additional data and explainations and cooperated in timely manner.

As for some details about report by Government entities. Mineral and petroleum authorities reported on 1724, Taxation on 774, General authorities of health and social insurance on 900, Customs office on 312, Chingeltei district on 136, Bayangol district on 114, Khan-Uul district on 13, Bayanzurkh district on 11, Nalaikh district on 11, Dornogovi aimag on 155, Tuv aimag on 77, Govi-Altai aimag on 62, Dundgovi aimag on 44, and Dornod aimag on 43 companies.

Major indications of Mongolia EITI Report

Mongolia EITI 2018 Report covers 202 companies, a total reconciled payments and revenues is 2.8 trillion MNT, unexplained discrepancies were 279 million MNT.

By size of revenues paid by company in 2018, Erdenet Copper Mine has paid 651.9 billion MNT, OT LLC paid 466.9 billion MNT, Erdenes Tavan Tolgoi paid 416.3 billion MNT, Petrochina Dachin Tamsag paid 261.5 billion MNT, Mongolyn alt MAK paid 184.4 billion MNT, Tavan tolgoi paid 177.1 billion MNT, Energy Resourse paid 126.5 billion MNT, Tsairt Mineral paid 81 billion MNT, and these companies have paid almost 85% of total revenues from extractive sector.

By size of revenue paid by type of payment, royalties were 1 trillion MNT, or 36%, Corporate income taxes were 649.7 billion MNT or 23%, oil revenue was 222.5 billion MNT or 7.9%, social insurance was 206 million MNT or 7.3%.

As for revenues collected at local level, Umnugovi aimag received 68.6 billion MNT or 44.3%, Orkhon aimag received 53.1 billion MNT or 34.3%, Bayangol district received 17 billion MNT or 11%.

As for 24 billion MNT donations provided by companies, 77.5% was paid by 6 companies such as OT, Tsairt Mineral, MonEnCo, Erdenet, Energy Resource, and Friendship Resource.

Result of selection and contract conclusion

At the beginning of 2019, a draft selection and terms of references for Mongolia EITI 2018 13th Report was delivered to Members of Working group electronically, collected their comments and proposals, and then it was approved and published in the newspaper.

The selection committee under a law on procurement of goods, service and consultancy by state and local budget funds was established at Secretariat, which was chaired by chief of department of MMHI Mr.N.Enkhbayar, composed of members: M.Tserenzhurmed, officer of Government Cabinet Secretariat, Mr.B.Batbold, member of Governing body of Mongolian Natural Environment Civil council, and Mrs.B.Tserenpurev, officer of NGO New Administrative Initiative, Mr.G.Ganbat, IT consultant of Secretariat, as secretary of Selection committee, which was established by order of State Secretary of Ministry of Mining and Heavy Industries.

During the course of selection process, some bidders made mistakes, some bidders complained and the process was delayed, as result MOF has been forced to cancel the recommendations of first selection, and reissued second selection process. So in accordance with this decision, the new tender was announced, selection committee was newly established.

The new Committee was chaired by chief of department of MMHI Mr.D.Damba, and members were Mr.Ts.Tsegts, senior specialist of Mineral and Petroleum Authorities, Mr.B.Batbold, member of Governing body of Mongolian Natural Environment Civil council, and Mrs.B.Tserenpurev, officer of NGO New Administrative Initiative, Mr.G.Ganbat, IT consultant of Secretariat, as secretary of Selection committee.

For the initial selection, companies such as Grant Thornton, KPMG audit and Confidence audit had expressed their interest.

But there was no satisfied selection of tender. There was complaint, MOF reviewed several times, and cancelled the initial ine, reissued the second one.

A new selection was announced in July, there were Grant Thornton, KPMG, Confidence audit and BDO audit companies. The selection was conducted successfully and BDO was selected as independent administrator, and the Contract was signed on August 30th.

On October 3, an inception workshop was organized with BDO audit company, and inception report was issued in October. BDO company has submitted a draft report to MSG meeting in November 29th, and following relevant conclusions, and presented final report to National Council, which endorsed this Report om December 19, 2019.

Reconciliation process

Consortium of Mongolian BDO audit company and Tunisian BDO audit firm has produced 2018 Mongolia EITI Report in compliance with EITI Standard, reconciled reports of 202 leading Mongolian companies with Government Reports, made relevant conclusions and recommendations.

The reconciliation launched in September continued till December.

Discussions of the 2018 EITI Report

Consortium of Mongolian BDO audit company and Tunisian BDO audit firm submitted a draft report to Working Group in November, there was a relevant discussion, gave feedback and in the principle the Working Group agreed to the draft report and to submit to National Council. The Consortium of Mongolian BDO audit company and Tunisian BDO audit firm has updated the Report and afterward, it was submitted to the National Council, which discussied it and at the end endorsed.

Disclosure of Beneficial ownership

In accordance with "Mongolia EITI Beneficial ownership Road 2020" Mongolia EITI jointly with EITI International Secretariat another round table of Government officials in May, all stakeholders participated.

Within scope of action plan of Anticorruption national program, in order to consolidate understanding, tackle complicated situation the AntiCorruption Committee organized a consultation on Cpntract transparency, legislation and Beneficial ownership.

60 companies out 202, which participated in Mongolia EITI 2018 report have voluntarily cooperated and disclosed data of own beneficial ownerships.

Trainings

Training activities at international level

Mr.G.Ganbat attended the series of training "Open Data", which was organized in Ukraine, February 2019, in combination to EITI Board Meeting.

In March a regional conference on BO disclosure was organized by ADB and EITI International Secretariat, in which senior officer of Cabinet Secretariat Mr.Bold, chiefs of departments of MMHI Ms.Ayasgalan and Mr.Enkhbayar participated and learned from experience from other countries.

In June, a Mongolian delegation had successfully participated in EITI 8th Global conference in Paris, France. The delegation was headed by Mr.G.Nandinjargal, state secretary of MMHI, secretary of Mongolia EITI National Council, and chief of MSG, and members were senior manager of OT LLC Mr.T.Munkhbat, coordinator of PWYP Mongolia Ms.B.Bayarmaa, IT consultant of Mongolia EITI Secretariat Mr. G.Ganbat at cost of EITI International Secretariat. Also Ms.Delgermaa, communication specialist of Mongolia EITI secretariat at cost of IFC, Ms.Sugarmaa, director of Energy resources LLC at own company's cost participated in this Conference. Mr.L.Tur-Od, Mongolia coordinator of Transparency International at cost of EITI International Secretariat participated in the Conference. The delegates made presentations at relevant sessions and country exhibition at EXPO at Conference.

Training activities at national level

The training and consultation on "Beneficial ownership disclosure" was organized in February, with Transparency International, and all representatives of stakeholders participated.

In April, jointly with MMHI, Open society forum during official launch of portal Open Contract consultation of Stakeholders local contracts, training of local authorities to uploading signed contracts to portal. Also, meeting of National Council and MSG on Contract and project level reporting.

In September, jointly with MMHI and Canadian Project Merit had organized the Easterb Regional conference on extractive sector, had consultation of legislation, organized training on EITI-E reporting.

Also, in September training and consultation on EITI mainstreaming among Governments specialists had been organized.

In October, together with BDO, inception seminar was organized and very first introduction of EITI New Standard 2019 was released, and finalized and agreed on scoping of Mongolia EITI 2018 report.

Also, in October, training on new EITI Standard and Beneficial Ownership was organized at Taxation authotiries with all central, capital city and districts tax inspectors. There were representatives from from State Registration authorities.

Dissemination and promotion

In September, under MMHI Open day event, A Responsible mining discussion was organized and exhibition of information materials was provided to public.

Mining Journal had devoted entire November edition to Responsible Mining with lots of interviews including EITI.

Two. Implementation of 2019 Work plan, status of achievement of objectives and results $^{\rm 3}$

Three. Status of meeting of each EITI Standard requirements

Final scores of Mongolia EITI assessment on meeting EITI standard Satisfied/			
Mongolia EITI 20 ²	not satisfied		
Category			
MSG oversight	Government engagement 1.1	Satisfied	
	Industry engagement 1.2	Satisfied	
Civil Society engagement 1.3		Satisfied	
MSG Governance 1.4		Satisfied	
	Workplan 1.5	Satisfied	
Licenses and con	Legal framework 2.1	Satisfied	
License allocations 2.2		Satisfied	
License register 2.3		Satisfied	
	Policy on contract disclosure 2.4		
	Beneficial ownership 2.5	Satisfied	
	State participation 2.6	Satisfied	
Monitoring	Exploration data 3.1	Satisfied	
production	Production data 3.2	Satisfied	
	Export data 3.3	Satisfied	
Revenue	Comprehensiveness 4.1	Satisfied	
collection In-kind revenues 4.2		Satisfied	
Barter agreements 4.3		Not applicable	
	Transportation revenues 4.4		
	SOE transactions 4.5		
	Direct subnational payments 4.6	Satisfied	
	Disaggregation 4.7	Satisfied	
	Data timeliness 4.8	Satisfied	
	Data quality 4.9	Satisfied	
Revenue	Revenue management and expenditures 5.1	Satisfied	
allocation	Subnational transfers 5.2	Satisfied	
	Distribution of revenues 5.3	Satisfied	
Socio-economic	Mandatory social expenditures 6.1	Satisfied	
contribution	SOE quasi-fiscal expenditures 6.2	Satisfied	
	Economic contribution 6.3	Satisfied	
Outcomes and	Public debate 7.1	Satisfied	
impact Data accessibility 7.2		Satisfied	
	Follow up on recommendations 7.3		
	Outcomes and impact of implementation 7.4	Satisfied	
Overall progress		Satisfied	

Four. Status of implementation recommendations under Mongolia EITI Report 2017

Recommendations	Reference to Mongolia EITI
	2018 Report

³ Implementation of Work plan of Mongolia EITI 2019 is given by attachment 1.

We recommend that the Law on Transparency in the Extractive Industries should be adopted promptly, replacing and nullifying the provisions of above-mentioned national laws restricting the disclosure of mineral related information. Previous EITI reports have recommended that PSAs should be published and there appear to be no legal or practical barriers preventing such disclosure, since the Government passed a resolution (Number 222) on July 4, 2015 requiring PSAs to be published. Accordingly, we recommend the National Council should engage with the necessary authorities to ensure that PSAs are duly made public.	The mentioned have not been amended. However, the Government pursuant to resolution No.263 of 2017 the information can be released. All concluded PSAs are posted at <u>www.iltodgeree.mn</u> since April, 2019.
We recommend that MRPAM should ensure that as a minimum, publicly available licence information complies in all respects with the minimum requirements of the EITI Standard for all minerals (and oil) on a timely basis and should ensure that the published information is up to date. (<i>recommendation made in previous years</i>)	MPAM are disclosing licenses, updating in timely manner is not strictly complied.
We recommend that the National Council and MEITI Secretariat should engage with MRPAM to ensure that this information is made available for reporting on 2018 extractive industry performance.	MPAM are disclosing data on production on monthly basis, but it is observed some details are missing.
We recommend that the National Council should follow up any government department and SOE which did not provide a letter of representation signed in accordance with its requirements or which did not provide the requested audit report, and ensure that all such missing assurance documentation is provided promptly to the MEITI secretariat, to be documented in the next EITI report.	A legal working group has been established at MMHI, which will draft a bill on transparency in mineral resources sector again, so this work is scheduled to cover this issue.
We recommend that the MEITI Secretariat should engage further with companies which did not use the e-Reporting system, or which did not provide the required assurance documentation so that all companies recognise the importance of these areas, with a view to compliance being improved for the next EITI report.	
We recommend that the National Council and MSWG should provide support to resolve these issues and to increase the understanding of the CGA management on the legal grounds of the EITI in order to assist CGA with the submission of more accurate initial reports for EITI.	There is basement to consider attitude of CGA is slightly becoming positive.
We recommend that the MSWG, advised by the MEITI secretariat, should specify the standard non revenue information which will be required each year to meet the requirements of the EITI Standard and request the relevant government entities to be prepared to provide the data for the next EITI report, if it is not already published.	A legal working group has been established at MMHI, which will draft a bill on transparency in mineral resources sector again, so this work is scheduled to cover this issue.
We recommend that the requirement to disclose beneficial ownership is included in the Law on Transparency in the Extractive Industry, nullifying the limitations in other laws and improving consistency between the laws.	A legal working group has been established at MMHI, which will draft a bill on transparency in mineral resources sector again, so this work is scheduled to cover this issue.

We further recommend that training sessions and multi stage discussions are arranged for the companies.	
We recommend that a suitably qualified body, such as the MNAO, should follow up the matters raised in the SOE reports which were qualified, so that the relevant SOEs are required to make improvements on the areas identified, and should in particular consider the incorrect material representation relating to the stock valuation of Erdenes Tavantolgoi JSC and give its own opinion on the correctness of financial statements.	Audit reports of SOEs are available at audit report section of www.audit.mn.
We recommend that the complete audited financial statements for all extractive SOEs should be published on the internet via, for example, the website of MNAO, the relevant SOE, MEITI or MRPAM.	Audit reports of SOEs are available at audit report section of www.audit.mn.
We recommend that the MEITI Secretariat should amend the e-Reporting templates to facilitate the gathering of information by project.	Relevant templates are updated, will be approved by MSG and National Council, then submitted to National Statistical Committee for endorsement, a respective activitiy is available in 2020 workplan.
We recommend that the MSWG should request MRPAM to investigate this further and the Ministry of Finance should review the accounts of the company to determine whether the financial statements of the company have been properly expressed and are compliant with the requirements of Mongolian law; and given the materiality of PetroChina to EITI reporting, that the MSWG should be provided with the results of these investigations so that it may be satisfied that that EITI reporting is being properly carried out.	Many EITI activities have not been implemented because of financial gap.
We recommend that the MSWG should develop and implement a policy on public participation to ensure the transparency of financial information of mining and petroleum companies.	The issue can be resolved with passing a bill on transparency in mineral resources sector. 2020 Work plan will assist in resolving financial issues, it can be more
Pursuant to the Resolution # 222 of the Government in 2012, the confidentiality provisions of relevant laws were nullified for the purpose of information to be used in the EITI. But the state officials are not fully aware of this, so that the financial reports of mining companies are still not fully transparent.	clear.

Five. Specific weaknesses, identified in the Mongolia EITI process, responses and lessons learnt

 Mongolia EITI has produced 13 Annual Reports and number of companies covered in the reports is increasing, but still number of companies which are not reporting stays high. It is estimated that at least 500 companies should report for EITI and under newly passed law on administrative violations, which is effective since July 1st, 2017, non-complied Companies shall be fined by 10 million MNT. The most companies are not agreeing to this fine, as result there are cases of misunderstanding between Professional Inspectorate and EITI Secretariat.

- 2. Some Government entities are still ignoring to answer to questions and not cooperating with Independent Administrator, example is about Customs Office. The issue needs to be resolved through clarification of legislative acts.
- Usage of information produced by EITI Annual Report is not high enough. This should be improved through identifying and segmenting by focus group, and processing in easier and accessible language, with some printed materials and training packages, and promote and activate such activities.
- 4. Sufficient number of planned activities under Mongolia EITI Work Plan should be carried out by those Professional associations, and Civil Society organizations under principle of contracting. This shall create opportunities for improving involvement and contribution of professional organizations. The 2020 work plan has action on contractual basis, which should be agreed with donors beforehand.
- 5. Relatively, contribution of the Government in implementation is high enough, but participation of high ranking Government officials is still not sufficient. Turnout of members of National Council and Working Group is not good, there is still delegating low ranking officials is taking place.
- 6. Participation of companies, their representative is passive, and not sufficient. Especially, participation of directors and legal managers, who can lead is still passive.
- 7. Need on aimag, capital, soum and district level to process new policy of EITI, information of the annual report and disseminate is still high, also it is necessary to improve capacity of local structure, improve their legal and financial surroundings, to provide with guidelines. After every election, it is very usual to change officials engaged, which effects on linkage and leads to loss of time. Therefore, it is very important to insure with resources and opportunities for sustainability and hard linkage.

	TOTAL DISBURSEMENT OF IMPLEMENTATION MONGOLIA EITI			
	Item	Work plan MNT	Disbursed MNT	Funding source
1	Regular National Council and MSG Meetings, consultations (including communications training for the MSG and reporting template enhancement workshop)	3.500.000	3.028.563	Grant of ADB, EBRD
2	Hiring of Independent Administrator for the 13th Mongolia EITI Report	196.213.000	196.213.000	GOM
3	Translation work	2.000.000	1.800.000	Grant of EBRD
4	Printing of 13th Mongolia EITI Report	19.754.000	11.544.000	Grant of EBRD
5	EITI Membership fee	25.020.000	25.020.000	GOM
	Management of the Mongolia EITI Secretariat			

1	Annual Assessment and Planning workshop	20.000.000	19.233.035	Grant of EBRD
2	Salaries of the EITI Secretariat	75.000.000	74.868.750	Grant of EBRD
3	Operational Expenses (equipment, Rental, communications, representation and transportation)	45.300.000	36.429.837	Grant of EBRD
	TOTAL	419.984.000	368.137.133	
	GOM funds	254.430.000	221.172.948	
	Grant of EBRD and ADB	165.554.000	146.904.185	

Seven. Meetings, decisions and experience sharing, attendance

7.1 Meetings of Mongolia EITI National Council

Meeting of National Council No.18 at the Ministry of Mining and Heavy industries, on December 19, 2019 and below decisions are listed:

- Mongolia EITI 13th 2018 Report produced by consortium of Mongolian and Tunisian BDO audit comapnie is endorsed. All constituencies are requested to post the report in the website and Secretariat is assigned to produce summary report and disclose to public, and advertise it. The Secretariat is assigned deliver Mongolia EITI 13th 2018 report to EITI International Secretariat before December 31st, 2018. The Secretariat is allowed to pay remaining sum under the contract to consortium of BDO companies.
- Report on implementation of Mongolia EITI 2019 Work plan is considered as sufficient and Mongolia EITI 2020 Work Plan is approved. Activites specified in 2019 Work Plan, which have not been implemented will be diverted to 2020 Work plan and finncing should be secured by the Secretariat.
- **3.** The updated templates are approved with proposals of Members given at the meeting. There shall be a technical working group to improve updated templates, and it was recommended to submit finalized version to National Statistical Committee for endorsement.
- **4.** It was agreed to postpone approval of Draft Goverbnment report on mainstreaming in order to coordinate with ongoing Government policy reforms, directions, programs and projects.

7.2 Meetings of Mongolia EITI Working Group

Mongolia EITI Working Group had one meeting in November, 2019.

Working Group Meeting No.49 was organized at Puma hotel on May 1, 2018 and below decisions are listed:

- 1. The draft Mongolia EITI 2018 is approved in the principle. It was instructed that BDO companies consortium to prepare the Report for meeting of National Council. The Secretariat is allowed to pay scheduled payment, which 50% of contract sum.
- 2. Progress of report of 2019 work plan and draft of 2020 Workplan were discussed and the Secretariat is instructed to update with comments and proposals of members of the Working group, prepare to submit them to National Council meeting.
- The Secretariat was allowed to update with comments and proposals of Working group reporting templates in compliance with new EITI standard and prepare for National Council meeting for endorsement.

4. The Secretariat was allowed to update with comments and proposals of Working group draft of Government resolution attachment on mainistreaming and prepare for National Council meeting for endorsement.

Eight. Attachments:

- 1. Implementation of Mongolia EITI 2019 Work Plan.
- 2. Mongolia EITI 2020 Work plan.
- 3. Updated Road map of Mongolia EITI Disclosure of Beneficial ownership 2020 with implementation status.
- 4. Attendance sheets of National Council and MSG meetings in 2019.