



# **CODE OF CONDUCT POLICY**

**Version 1**

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# ABOUT THE CODE OF CONDUCT

## OUR CODE OF CONDUCT

- **Is presented by 8 institutional VALUES** that guide our actions.
- **Describes our PRACTICES** that ensure harmony and transparency within our organization and those stakeholders whom we do business with.
- **Defines our COMMITMENT** to all employees and stakeholders.

## INTRODUCTION

Lamana Hotel recognizes that the manner in which the company and its employee, contractors, suppliers and agents conduct themselves both professionally and personally.

We are committed to ensuring that the Code of Conduct is utilized in a consistent format, to agreed protocols and maintains its currency over the life of this document and our day to day operations.

Director, Managers, Divisional Heads, and Supervisors are responsible for disseminating the CODE to ensure that it is understood and applied effectively.

All must:

- Refer regularly to the Code of Conduct during team briefings/meetings to ensure that all staff fully understand.

- Engage in meaningful discussions that encourage employees to speak up on certain concerns they have.
- Review systems and processes set in place and direct to Ethics Committee when necessary.
- Ensure strict compliance with Code of Conduct by employees under their authority.
- Demonstration the expected conduct of themselves.

## PURPOSE

Lamana Hotel promotes a workplace that is friendly, harmonious, and safe and recognizes the local communities in which we work.

To ensure our success in this endeavor, it is incumbent on the Company and its managers to set conduct expectations and ensure that persons performing work for or acting on behalf of Lamana Hotel abide by this Code of Conduct when dealing with clients, colleagues and the wider community.

The Code of Conduct also supports the Company in complying with all applicable national and international laws.

This Standard applies to all Lamana Hotel employees, contractors, subcontractors, agents and consultants. For the purpose of this Standard they shall be collectively referred to as employees.

That Standard is applicable in all of our workplaces whether office or project bases, as well as Company supplied accommodation.

## DEFINITIONS

<b>Employee</b>	Any person employed on a Lamana Hotel site or premises either directly or indirectly.
<b>Contractor</b>	A person or organization (including Contractor personnel and their subcontractor personnel) engaged to deliver services for Lamana Hotel.
<b>Consultant</b>	The provider of professional services or expert advice in a particular field to Lamana Hotel.
<b>Subcontractor</b>	Any person, business or supplier engaged by Lamana Hotel or supplier to perform all or any portion of the services or related activities on behalf of Lamana Hotel or supplier.

## LEGAL & OTHER OBLIGATIONS

The legal and other obligations applicable to this code include but are not limited to:

- Employment Act 1978
- Employment Regulation 1980
- Employment of Non-Citizens Act 2007
- Employment of Non-Citizens Regulation 2008
- Industrial Relations Act 1962
- Industrial Relations Regulation 1972
- Companies Act 1997
- Companies Regulation 1998
- Companies Rules
- Discriminatory Practices Act 1963
- Anti-Money Laundering and Counter Terrorist Financing Act 2015
- Criminal Code (Sexual Offences and Crimes Against Children) Act
- Lukautim Pikinini Act 2015
- Whistleblower Act 2020

# 1 RESPONSIBILITY & ACCOUNTABILITY

## **Managing Director**

Is responsible for:

- The development and authorization of this Standard.

## **General Manager**

Is responsible and accountable for:

- Development and review of this standard and related documents.
- Addressing significant breaches of the code.
- Reporting of overall analysis of breaches of the code to Executive Team.

## **Business Unit Managers**

Are accountable for:

- Ensuring that employees are inducted into the requirements of the code of conduct and understand their obligations to comply with the code.
- Management and reporting of breaches of the code.
- Monitoring and evaluating the operation of this code.

## **Project Managers, Senior Engineers**

Are responsible and accountable for:

- The implementation of this Standard within their Projects
- Monitoring and reviewing their projects compliance to this Standard
- Management and reporting of breaches of the code
- Monitoring and evaluating the operation of this code

## **Supervisors**

Are responsible for:

- Monitoring and evaluating the operation of this code
- Management and reporting of breaches of the code

## **HR Manager**

Is responsible and accountable for:

- The development of this Standard and related documents.
- Review and maintenance of this Standard and related documents.
- Compliance of this Standard within Lamana Hotel.
- The provision and distribution of this Standard to all persons with a legitimate right to know.
- Management and reporting of breaches of the code.
- Monitoring and evaluating the operation of this code.

## Employees

Are responsible for:

- Complying with the Code of Conduct, applicable laws, regulations as well as Lamana Hotel policies and system requirements.

## 2 VISION VALUES

To assist Lamana Hotel in building strong and ethical relationships with its employees, clients and the community, this Code of Conduct is aligned with Lamana Hotel's vision and values.

Lamana Hotel shall incorporate its vision and values into operational activities and business objectives.

### VISION

**"For Lamana Hotel to be acknowledged as premier hotel and leisure precinct in Port Moresby."**

### VALUES

- The Health, Safety and Welfare of our employees, contractors', clients and communities are always our priority
- Focus on client expectations of time, cost and quality
- Uncompromising standards of work
- Integrity, fairness and progression in the workplace
- Respect for communities and the environment
- Teamwork within Lamana Hotel, and with our designers
- Use of reputable subcontractors, consultants and suppliers
- Pride in our name and pride in our work



## PROFESSIONAL CONDUCT

All employees are expected to act consistently with fundamental Lamana Hotel values, ethical behavior, respect for others and accountability and transparency in business conduct.

Employees are expected to:

- The Health, Safety and Welfare of our employees, contractors', Clients and communities are always our priority.
- Focus on client expectations of time, cost and quality.
- Uncompromising standards of work.
- Integrity, fairness and progression in the workplace.
- Respect for communities and the environment.
- Teamwork within Lamana Hotel, and with our designers.
- Use of reputable subcontractors, consultants and suppliers.
- Pride in our name and pride in our work.

## 3 BUSINESS RELATIONS

The process for development and control of internal documents is illustrated on the next page.

### Confidentiality

All employees are required to protect proprietary, commercial and other information that is confidential to the Company.

The obligation of confidentiality shall continue after an individual's employment with Lamana Hotel ends.

Information that is not publicly available concerning the activities, results or plans of the Company must only be used for authorized purposes.

Employees shall be required to sign a confidentiality agreement on commencement of employment or contract.

## **Conflicts of Interest**

Employees of the Company are expected to act at all times exercise sound judgment unclouded by personal interests or divided loyalties.

Employees must avoid the appearance of, as well as actual, conflicts of interest in both their performance of duties and in their outside activities.

Where conflicts of interest either perceived or real exist, the issue should be raised with the employee's direct supervisor, who will ensure it is raised and clarified with Senior Management.

## **Entertainment, Gifts and Gratuities**

Employees are to exercise care when giving or receiving business related gifts.

Entertainment of clients and suppliers provided (or received) should not extend beyond a level reasonably required to maintain a professional business relationship. The following principles should apply:

- The hosting of Company sponsored functions or provision of gratuities is within the delegation and authority levels.
- When considering options for expenditure employees will assess the value to the business e.g. The provision of coffee or a light lunch, over the provision of dinner.
- Where alcohol is provided at the function, it is hosted in a socially responsible manner, which will not bring the Company into disrepute.
- Expense records are maintained and allocated to entertainment cost code in the chart of accounts.

The employee must consider the monetary value of the gift and legal requirements when determining whether a gift should be retained, returned or shared.

Where doubt exists on what is reasonable, the issue should be raised with the employee's direct supervisor, who will ensure it is raised and clarified with Senior Management.

## **Bribes and Kickbacks**

Employees of Lamana Hotel must not offer or accept cash or any other incentive, inducement or reward in any form.

In particular payments to win projects or influence a business decision in the Company's favor.

Violation of this is considered serious and will subject an employee to disciplinary action as well as potential criminal prosecution.

Employees should take all practical steps to ensure that agents, contractors or business partners do not engage in conduct on Lamana Hotel's behalf that would contravene this Standard.

Any attempted or alleged bribery must be raised with the employee's direct supervisor, who will ensure it is raised with Senior Management.

Senior Management will initiate an investigation into the allegations. Where appropriate, Senior Management will utilize an independent investigator.

Where allegations are made concerning government officials, Senior Management will report these allegations to the appropriate government department.

## **Donations Grants and Requests**

Lamana Hotel over years has supported many worthy causes in PNG. This has included but not been limited to:

- The Sir Theophilus Foundation
- Red Cross
- The PNG Children's Foundation
- Miss Pacific Islands PNG
- Digicel Foundation
- Chesire Homes PNG
- RSPCA
- Soroptimist International POM

- Buk Bilong Pikinini
- Cricket PNG
- Other Not for Profit Organisations

This support has been through either direct financial support or the provision of goods, service and other Company resources. Where direct requests for financial support are requested they must be:

- In writing clearly stating the nature of the request and amount.
- On official letter head.
- Authorized by the senior organisation officer.

All requests for financial donations/financial assisted must be forward to the Managing Director.

All requests must be authorized by the Managing Director. Lamana Hotel have additionally provided some “in kind” support for small communities and/or landowners during our project activities, please refer to the table of delegated authorities.

Requests of this nature should:

- Be in writing.
- Assessed as beneficial to the Company interests.
- Within the responsible persons delegations and authorities level.
- Kept as a documented record.

## **Donations and Support to Political Parties**

As a significant company group in property and infrastructure development, construction and materials supply, Lamana

Hotel has a responsibility to its shareholders and stakeholders to participate in the process of public policy development. Therefore, Lamana Hotel is a member of various networking forums organized by political parties and attends networking events that support political parties as they participate in the democratic system of parliamentary government.

Lamana Hotel takes a strict principles-based approach to making political donations. These principles are:

- Strict compliance with all laws;
- An honest and transparent approach at all times;
- All donations must have a public policy focus with the aim of creating value for customers, partners, the community and shareholders;

And

- A multi-partisan approach must be taken as much as is practicable.  
Some public policy priorities which Constantinou Group advocates for include:
- Quality and sustainable property and infrastructure development;
- Strategic priorities to create value for Lamana Hotel customers, partners, the community and shareholders.

Lamana Hotel may, at its discretion, from time to time authorize donations under the PNG Organic Law on the Integrity of Political Parties and Candidates to either:

- The Central Fund
- A Registered Political Party
- A candidate for election

Any request for donations will not exceed the limits set within the law.

Any request for donations must be forwarded to the Managing Director.

Requests for donations may only be authorized by the Managing Director.

Where a contribution is authorized and made to a political party Lamana Hotel will:

- Within 30 days of making the contribution, inform the Registrar of Political Parties of:
  - o The amount of the contribution; and
  - o The name of the political party or candidate, as the case may be, to which or whom the contribution was made; and
  - o The date on which the contribution was made; and Such other matters concerning the contribution as may be prescribed.

## **Lamana Hotel Personnel and Agents Standing for Election**

Lamana Hotel respect the right of every PNG citizen to stand for public office. Where a Lamana Hotel employee or agent stands for public office, they must:

- Inform the Company of their intention to stand.
- Not utilize any Company resources of any kind (including Company time) without the direct approval in writing of the Managing Director.

# 4 EMPLOYMENT PRACTICES

## **Human Resources**

Lamana Hotel has implemented a wide range of human resources policies, procedures, standards, and guidelines. The key points of the policies, procedures, standards and guidelines, as well as any applicable laws will be included in the Company Induction.

It is the responsibility of all employees to understand and comply with all policies, procedures, standards and guidelines at all times.

To understand and comply with these documents can all be obtained from the employees' direct supervisor of the Human Resources Department.

Where changes to policies, procedures, standards and guidelines are implemented, the Human Resources department will ensure they are fully communicated to all parties with a legitimate right to know.

## **Equal Employment Opportunities and Anti-Discrimination**

Lamana Hotel have a commitment to ensuring all employees or potential employees are given equal opportunities and are not subject to discriminatory practices, when applying for vacant positions or promotions. This commitment is based on the following principles:



- No person is unlawfully excluded from consideration for employment because of race, colour, religious creed, national origin, ancestry, sex, age, veteran status, marital status or physical challenges.
- Management and supervisory levels have the responsibility to further implement this policy and ensure conformance by subordinates.
- Any employee who engages in discrimination can be subject to disciplinary action
- Any supervisory or managerial employee who knows of such behavior and fails to take immediate and appropriate corrective action could also be subject to disciplinary action.
- Any individual who is the target of discrimination is encouraged to discuss the matter with the Project/Business Unit Manager.
- Any individual who feels such a discussion would be or has been futile, unsatisfactory or counterproductive should contact the Human Resources department.
- Furthermore, we will not tolerate any form of discrimination or harassment of our employees by co-workers, supervisors, customers, or vendors. This commitment extends to our policies on recruiting, advertising, hiring, placement, promotion, training, transfer, wages, benefits, termination and all other privileges, terms and conditions of employment.
- Lamana Hotel will actively identify work opportunities for gender equity and social inclusion target groups.

### **Responsibility to the Community**

Lamana Hotel recognize we have a “Duty of Care” to act responsibly to minimize the impact of our operations on the communities in which we operate.

As a good corporate citizen, all employees, contractors and consultants must and are expected to maintain, open, cordial and professional relations with these communities.

## **Health, Safety and Environment**

Lamana Hotel is committed to ensuring that the communities in which we operate are not exposed to unacceptable risk arising from our operations.

Employees will ensure that when interacting with our community's appropriate strategies will be implemented to reduce the risk of accident, injury or impact on the environment.

As a member of the Lamana Hotel team it is important that employees act and promote these principles in the workplace and raise any concerns in the appropriate forum.

## **Addressing Community Concerns**

Where community members raise concerns over health and safety or environmental issues the responsible managers will ensure:

- All concerns are fully documented.
- Investigated.
- Remedial action to address the issue is developed and implemented.

## Requests for Compensation

Where potentially impacted communities request or demand compensation arising from alleged impact on health and safety or the environment. These requests should be forwarded to senior management for assessment.

At no time are employees without the appropriated authorization allowed to admit to an alleged compensable act or to the make promises with regard to compensation.

## 5 INTERPERSONAL RELATIONS

Lamana Hotel recognize that many personal relationships occur when people meet within the working environment.

We additionally recognize that many of our employee's children and relations work within the business.

We do however expect that standards of interpersonal behavior must be maintained at all times. This includes but is not limited:

- Acts of violence and in particular gender bases violence (GBV) **WILL NOT BE TOLERATED** even when occurring outside of our operations.
- Inappropriate sexual relations or conduct.
- Utilizing personal relationships to unfairly promote or provide unmerited opportunities or benefits.
- Gossip based on unfounded allegation and/ or innuendo.

# 6 DISCIPLINARY ACTION

Employees who breach this Code of Conduct can be subject to disciplinary action. This includes:

- Termination for Cause
- Suspension without pay
- Letters of Warning
- Verbal cautions

## Termination for Cause

The basic principles will apply when considering termination of an employee.

Termination must be:

- Lawful: meaning it must satisfy the requirements of the PNG Employment Act.
- Fair: meaning whether or not the principles of natural justice have been satisfied by the employer.
- Rules & Policies must be posted on all notice boards in an understandable language and form not giving room for the excuse of “not knowing the rules”.

Examples of Termination for Cause Events:

- Breach of Law - Theft of Company property, embezzlement, assault.
- Breach of Code of Conduct - Bringing the Company into disrepute, dishonest dealings, bribery.
- Breach of Policies - Drunk at work, misuse of Company property, bullying and harassment.

## **Suspension**

Suspension can be used as a disciplinary action depending on the seriousness of the offence. It must not be more than once and 2 weeks or less.

Suspension due to an offence will require a formal documented investigation as soon as practicable after the event. It must take less than a week and a formal Letter of Suspension must be issued to the employee.

Investigation documents and Letters of Suspension must be signed by the responsible manager and the employee and recorded in the employees file.

## **Letters of Warning**

Warnings can be given as first, second and final warnings, depending on the seriousness of the event.

Warnings can also be issued as First and Final, depending on the seriousness of the event.

Warning letters must be signed by the employee and the responsible manager issuing the warning.

Letters of Warning recorded in the employees file.

Where the employee refuses to sign, it should be noted as “refused to sign on the notice”.

## **Verbal Cautions**

Verbal cautions can be used as a tool to improve employees’ performance prior to a Termination for Cause, suspension of Letter of Warning.

Where verbal cautions are utilized, the responsible person must maintain a diary note as evidence the discussion took place. This should be initialed by the employee.

## 7 REVIEW

This document will be reviewed and modified where significant changes to statutory obligations or Lamana Hotel policies, standards and procedures occur.

## POLICY APPROVAL



Yiannis Nicolaou  
General Manager  
Lamana Hotel

Date: 26/01/21.