

LDL-ADM-002-CODE OF CONDUCT

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General Manager
 Lamana Development Limited

Document Control Standard

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LDL CODE OF CONDUCT

1 INTRODUCTION

Lamana Development Limited (LDL, Lamana Development, or the Company) recognises that the way the Company and its Employees, subcontractors, suppliers, and agents conduct themselves, both professionally and personally, is integral to the success of the business.

The Company is committed to ensuring that this Code of Conduct is developed and updated to legal and morally acceptable values and protocols and maintains its currency over the life of the document. This document may be updated from time to time.

2 PURPOSE AND SCOPE

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

To ensure our success in this endeavour, 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 Development abide by this Code of Conduct when dealing with Clients, Authorities, Suppliers, Subcontractors, colleagues, and the wider community.

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

This Standard applies to all Lamana Development Employees, Subcontractors, Suppliers, and Consultants. For the purpose of this Standard, they shall be collectively referred to as Employees.

The Standard is applicable in all the Company's workplaces, whether office or project based, as well as Company supplied accommodation.

3 LEGAL AND OTHER OBLIGATIONS

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

- Workplace Health and Safety Act 1961
- 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 Pikitini Act 2015
- Whistle Blower Act 2020

4 SUPPORTING DOCUMENTATION

Supporting documentation for this code is contained in Attachment 1.

5 DEFINITIONS

Employee	Any person employed on a Lamana Development site or premises, either directly or indirectly.
Consultant	The provider of professional services or expert advice in a particular field to Lamana Development.
Subcontractor	Any person business engaged by Lamana Development to perform any portion of the works, services, or related activities for Lamana Development under an LDL subcontract agreement or supplier agreement.
Supplier	Any person or business engaged by Lamana Development to supply any materials or products to Lamana Development under an LDL subcontract agreement or supplier agreement.

6 RESPONSIBILITY AND ACCOUNTABILITY

6.1 Managing Director

The Managing Director is responsible for:

- the development and authorisation of this Standard.

6.2 General Manager

The General Manager is responsible and accountable for:

- the development and review of this Standard and related documents,
- addressing significant breaches of the code and
- the reporting of an overall analysis of any breaches of the code to the executive team.

6.3 Business Unit Managers

Business Unit Managers are accountable for:

- ensuring that Employees are inducted into the requirements of the Code of Conduct and that Employees understand their obligations to comply with the code,
- the management and reporting of breaches of the code and
- the monitoring and evaluation of the operation of this code.

6.4 Human Resource Manager

The Human Resources Manager is responsible and accountable for:

- contributing to the development of this Standard and related documents,
- the review and maintenance of this Standard and related documents,
- the provision and distribution of this Standard to all persons with a legitimate right to know,
- the reporting, if aware, of non-compliance of this Standard within Lamana Development, to senior management
- the monitoring and evaluation of the operation of this code.

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6.5 Project Managers

Project Managers are responsible and accountable for:

- the implementation of this Standard within their Projects,
- monitoring and reviewing their projects compliance to this Standard,
- the management and reporting of breaches of the code and
- the monitoring and evaluation of the operation of this code.

6.6 Supervisors

Supervisors are responsible for:

- the monitoring and evaluation of the operation of this code and
- the management and reporting of breaches of the code.

6.7 Employees

Employees are responsible for:

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

7 DESCRIPTION

7.1 Visions and Values

To assist Lamana Development in building strong and ethical relationships with its Employees, clients, subcontractors, suppliers, and the community, this Code of Conduct is aligned with Lamana Development's vision and values. Lamana Development shall incorporate its vision and values into operational activities and business objectives.

7.1.1 Vision

It is Lamana Development's vision to be acknowledged as the building developer and builder of choice throughout Papua New Guinea.

7.1.2 Values

Lamana Development holds the following values.

- The Health, Safety and Welfare of our Employees, clients, subcontractors, suppliers, consultants, and communities always being our priority;
- Focusing on client expectations of time, cost, and quality;
- Uncompromising standards of work;

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- Integrity, fairness, and progression in the workplace;
- Respect for communities and the environment;
- Teamwork within Lamana Development and our interaction with our designers;
- Use of reputable subcontractors, suppliers, and consultants; and
- Pride in our name and pride in our work.

7.1.3 Professional Conduct

All Employees are expected to act consistently with fundamental Lamana Development values, behave ethically, respect others and be accountable and transparent in conducting business.

Employees are expected to:

- Ensure all business is conducted in accordance with the law and high ethical standards, including equal opportunity and anti-discrimination laws, gender equity, social inclusion, and gender-based anti-violence laws and standards;
- Perform their duties in a manner that minimises environmental impacts and maximises workplace safety;
- Respect confidentiality and not misuse Lamana Development information, assets, or facilities;
- Ensure their actions do not bring the Company into disrepute;
- Avoid real or perceived conflicts of interest;
- Denounce behaviour that might be perceived as bullying or intimidatory;
- Exercise fairness, courtesy, respect, consideration, and sensitivity in all dealings;
- Always act with honesty, integrity, decency, and responsibility;
- Behave and present themselves in a professional and positive manner that always supports Lamana Development's vision and values; and
- Not engage in any act of violence, in particular gender-based violence, whether internal or external to the workplace.

7.2 Business Relations

The processes for development and control of internal documents are defined below.

7.2.1 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 Development ends.

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

Employees shall be required to sign a confidentiality agreement on commencement of employment or signing of a contract with the Company, such confidentiality agreement continuing after termination of that employment or contract.

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7.2.2 Conflicts of Interest

Employees of the Company are expected to always exercise sound judgment and to always act in a manner unclouded by personal interests or divided loyalties.

Employees must avoid any conflict of interest, or the appearance of a conflict of interest, in both the performance of their duties and in their outside activities.

Where a conflict of interest, either perceived or real, exists, the issue must be raised by the Employee with the Employee's direct Supervisor who will ensure it is raised and clarified with Senior Management. Should an Employee's Supervisor perceive a conflict of interest exists, it shall be raised with the Employee who shall be candid in the discussion on the issue.

7.2.3 Entertainment, Gifts and Gratuities

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

The provision and the receipt of entertainment involving Clients, Consultants, Subcontractors and Suppliers 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, must be within the delegation or authority level of the Employee responsible for the function or gratuity.
- When considering options for expenditure, Employees must assess the benefit to the business against the value of the expense, e.g. the provision of coffee or a light lunch, over the provision of dinner.
- Where alcohol is provided at a function, it shall be hosted in a socially responsible manner which will not bring the Company into disrepute.
- Expense records are to be maintained and allocated to the correct entertainment cost code in the chart of accounts.

An Employee who receives a gift of any kind must consider the monetary value of the gift and any applicable 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 that it is raised and clarified with Senior Management.

7.2.4 Bribes and Kickbacks

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

Specifically, payments to win projects or influence a business decision in the Company's favour is strictly prohibited.

Violation of this matter is serious misconduct and will subject the Employee to disciplinary action, possible termination of employment, as well as potential criminal prosecution.

Employees should take all practical steps to ensure that agents, subcontractors, suppliers, consultants, or business partners do not engage in conduct on Lamana Development's behalf that would contravene this key Lamana Development standard.

Any attempted or alleged bribery must be raised with the Employee's direct Supervisor, who will

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ensure that it is raised with Senior Management.

Senior Management will initiate an investigation into any allegations raised. Where deemed appropriate, Senior Management will utilise an independent investigator.

Where allegations are made concerning Government officials, Senior Management may report these allegations to the appropriate Government department after consideration of the full facts of the issue by the Managing Director and General Manager.

7.2.5 Donations Grants and Requests

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

- The Sir Theophilus Foundation
- Red Cross
- Buk Bilong Pikinini
- Cricket PNG
- The Kiwi Club
- Other Not for Profit Organisations

This support has been through either direct financial support or the provision of goods, services, 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 the amount requested.
- On an official letter head.
- Authorised by the senior officer of the organisation requesting the support.

All requests for financial donations or financial assistance must be forward to the Managing Director for consideration.

All donations or grants resulting from requests must be authorised by the Managing Director prior to the donation or grant being provided.

Lamana Development have additionally provided some “in kind” support for small communities and landowners during our project activities, please refer to the table of delegated authorities.

Requests of this nature should:

- be in writing,
- be assessed by the project manager or general manager as beneficial to the Company interests,
- be within the responsible person’s delegations and authority level and
- be kept as a documented record.

7.2.6 Donations and Support to Political Parties

As a significant company in property and infrastructure development, construction and materials supply, Lamana Development has a responsibility to its shareholders and stakeholders to participate in the process of public policy development. Therefore, Lamana Development is a member of various networking forums organised by political parties and it attends networking events that support political parties, as they participate in the democratic system of parliamentary government.

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

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- strict compliance with all laws,
- an honest and transparent approach always,
- all donations having a public policy focus with the aim of creating value for customers, partners, the community, and shareholders and
- a multi-partisan approach being taken as much as is practicable.

Some public policy priorities for which Lamana Development advocates include:

- quality and sustainable property and infrastructure development and
- strategic priorities to create value for the community and Lamana Development customers, partners, and shareholders.

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

- the Central Fund,
- a Registered Political Party, or
- a candidate for election.

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

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

The granting of requests for political donations can be authorised only by the Managing Director.

Where a contribution is authorised and made to a political party, Lamana Development will:

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

7.2.7 Lamana Development Personnel and Agents Standing for Election

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

- inform the Company of their intention to stand and
- not utilise any Company resources of any kind (including Company time) towards that effort to stand for public office without the direct approval in writing of the Managing Director.

8 EMPLOYMENT PRACTICES

8.1 Human Resources

Lamana Development 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 always.

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To understand and comply with these, the relevant documents can all be obtained from the Employee's direct Supervisor, or the Human Resources department.

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

8.1.1 Equal Employment Opportunities and Anti-Discrimination

Lamana Development have a commitment to ensuring that 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 any discriminatory practice can be subject to disciplinary action and possible termination.
- Any Supervisory or managerial Employee who knows of such behaviour and fails to take immediate and appropriate corrective action could also be subject to disciplinary action and possible termination.
- Any individual who is the target of any discriminatory practice is encouraged to discuss the matter with the Project Manager or 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.
- The Company will not tolerate any form of discrimination or harassment of its Employees by co-workers, Supervisors, customers, or vendors. This commitment extends to Company policies on recruiting, advertising, hiring, placement, promotion, training, transfer, wages, benefits, termination and all other privileges, terms, and conditions of employment.
- Lamana Development will actively identify work opportunities for gender equity and social inclusion target groups.

8.2 Responsibility to the Community

Lamana Development recognise that it has a "Duty of Care" to act responsibly to minimise the impact of its operations on the communities in which it operates.

As a good corporate citizen, the Company requires that all Employees, Subcontractors, Suppliers and Consultants must maintain open, cordial, and professional relations with these communities.

8.2.1 Health, Safety and Environment

Lamana Development is committed to ensuring that the communities in which it operates are not exposed to unacceptable risks arising from its operations.

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

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

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8.2.2 Addressing Community Concerns

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

- all concerns are fully documented;
- all concerns are investigated; and if necessary
- remedial action to address the issue is developed and implemented.

8.2.3 Requests for Compensation

Where potentially affected communities request or demand compensation arising from alleged negative effects on health, safety or the environment, these requests should be forwarded to senior management for assessment.

At no time are Employees without the appropriate authorisation allowed to admit to an alleged compensable act, or to the make promises regarding compensation.

9 INTERPERSONAL RELATIONSHIPS

Lamana Development recognise that many personal relationships occur when people meet within the working environment.

We additionally recognise that some of our Employee's children and relations work within the business.

We do however expect that good standards of interpersonal behaviour must always be maintained. This includes but is not limited to the following.

- 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 will not be tolerated.
- Utilising personal relationships to unfairly promote, or to provide unmerited opportunities, or benefits will not be tolerated.
- Gossip based on unfounded allegations or innuendo will not be tolerated.

10 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, or
- Verbal cautions.

10.1 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.

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- Rules & Policies must be posted on all notice boards in English or Tok Pisin, 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.

10.2 Suspension

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

Suspension due to an offence will require a formal documented investigation as soon as practical after the event. The investigation must take less than a week, if possible, 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 be recorded in the Employee’s file.

10.3 Letters of Warning

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

Warning Letters 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 are to be recorded in the Employee’s file.

Where the Employee refuses to sign a Warning Letter, it should be noted as “refused to sign on the notice” by the officer delivering the Letter of Warning.

10.4 Verbal Cautions

Verbal cautions can be used as a tool to attempt to improve an Employee’s performance prior to a Termination for Cause, suspension, or Letter of Warning.

Where verbal cautions are utilised, the responsible person must maintain a diary note as evidence that the discussion took place. This should be initialled by the Employee or marked as “refused to sign” if the Employee refuses to initial the diary entry.

11 REVIEW

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