



PME
— since 1968 —

Code of Business Conduct



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Managing Director's Message

PME is renowned for undertaking and executing some of the most challenging and difficult projects across Papua New Guinea.

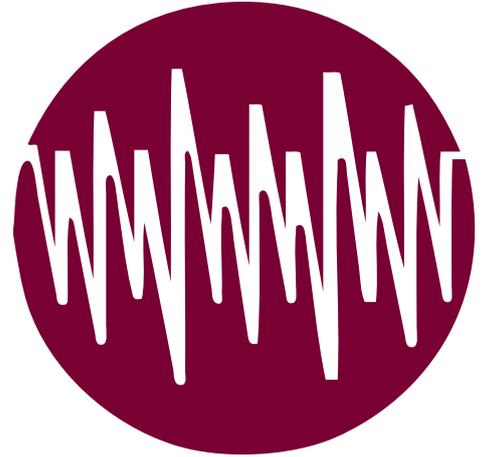
The scope and quality of these projects is the most obvious thing that people see, but there are many other factors (including our conduct) that are just as important in defining who we are and how our company is perceived.

Paramount to our values is our commitment to complying with legislative requirements and always acting with integrity and fairness in line with community standards.

To assist us in achieving this goal, we have adopted a Code of Business Conduct that sets out guidance on how we should behave within PME. The Code of Business Conduct will be distributed across the business and will also be available via our Website.

PME enjoys a long and impressive history, with a reputation to match. It is essential that each employee or those representing the company act consistently in a manner that is ethical, legally compliant and protects our hard earned reputation.

Mark Gibbons
Managing Director – PME



PME - Code of Ethics

PME is made up of men and women whose purpose is to build and maintain a sustainable business that meets the needs of our clients, including winning and undertaking profitable work.

The Companies core values are:

- Discipline.
- Integrity.
- Safety.
- Success.

The Companies obligations are to:

- Provide a safe and healthy workplace.
- Act with honesty, integrity and fairness.
- Respect the environment.
- Respect the needs of the communities in which we work.
- Be commercially competitive.
- Establish clear lines of accountability.
- Create a fun, challenging and performance driven culture.
- Encourage and support innovation and technological leadership.

The Companies employees' obligations are to:

- Respect and look after each other, the people around you and the community and environment we work in.
- Act with honesty, integrity and fairness.
- Work together – hard, smart and in the long term interests of PME.
- Speak to your employer whenever something really seems to be wrong.
- Share your ideas for improvements.
- Assume personal responsibility and accountability for your work.

Company Values

As our business grows and evolves, it is our values that firmly anchor our culture and make us unique. PME bases its business approach on a set of values that articulate our culture. Our values define the way we work – it's not just what we do, but how we do it that counts.

SAFETY AND HEALTH ABOVE ALL ELSE

Safety is our number one priority. We vigorously protect the safety and wellbeing of our workers. We actively participate to improve safety for all who operate in the industries we share.

ENDURING BUSINESS RELATIONSHIPS

We act with integrity and deliver on our promises. With a proven track record built over 40 years, we are trusted by our clients, partners and suppliers.

ACHIEVEMENT THROUGH TEAMWORK

What we deliver is far greater than the sum of its parts. We work collaboratively towards common goals to meet challenges and deliver high quality solutions.

OUR PEOPLE ARE THE FOUNDATION OF OUR SUCCESS

Our people stand out. With a 'can do' attitude, our people consistently deliver. We value and listen to their contributions and thoughts, we achieve success through their inspiration and we continue to invest in their future.

RESPECT FOR THE COMMUNITY AND ENVIRONMENT

We strive to exceed expectations. We care for the environment, are sensitive to the views of local communities, and continue to maintain a reputation as a respected corporate citizen.

1 About this Code

1.1 ETHICS AND COMPLIANCE FRAMEWORK

PME HAS A STRONG COMMITMENT TO UNDERTAKING ITS BUSINESS WITH INTEGRITY – TO DO WHAT IS RIGHT AND ETHICAL.

GENERAL PRINCIPLES

We expect our employees and business partners to always:

- Act with honesty, integrity and fairness, in accordance with this Code of Business Conduct and our values.
- Comply with PME Rules, which comprise:
 - All Business Standards and processes implemented by PME, which are aligned to the PME Corporate Governance System (CGS).
- Comply with all applicable laws wherever we operate.



ETHICAL DECISION-MAKING MODEL

STEP 1 – DEFINE THE ISSUE

- What is concerning about the situation?
- Who else is involved and what is their perspective?
- What effect does your behaviour have on the issue?

STEP 2 – IDENTIFY THE UNDERLYING POLICIES, PRINCIPLES AND VALUES

- How do the PME Rules require you to behave?
- If there is no relevant Business Standard or process how does this Code require you to behave?
- If this Code does not deal with the issue, how do our values require you to behave?

STEP 3 – CONSIDER YOUR OPTIONS

- What are the alternative options in this situation?

- For each of those options, do they conflict with any aspect of our Business Standards, principles or values?
- How might they affect PME, and what are the potential consequences?
- When you have reviewed your options, consider obtaining a second opinion from an independent, trusted person.

STEP 4 – MAKE THE RIGHT CHOICE

You need to be able to justify your actions and, in turn, be able to show that they are consistent with our policies, principles and values.

NOT SURE WHAT TO DO?

A quick decision making test is:

- Do you have all the information that is significant to the decision you are about to make?
- Is it legal?
- Does it comply with this Code?

- What would your family, colleagues or manager say about the decision you are about to make?
- How would you feel if your decision was reported in the media?
- Would you be confident explaining your actions to senior management or external authorities?
- How would your behaviour be viewed in one or five years from now?
- Would you be happy if you were treated this way?

If your decision passes this test, and you feel confident about the choice you have made, it is probably the right thing to do.

If you are still in doubt, please raise your concern with your supervisor or manager, or as otherwise outlined in this Code.

1.2 ABOUT THIS CODE

THIS CODE REPRESENTS THE COMMITMENT BY PME TO UPHOLD ETHICAL BUSINESS PRACTICES AND MEET OR, WHERE LESS STRINGENT THAN OUR STANDARDS, EXCEED APPLICABLE LEGAL AND OTHER REQUIREMENTS. THIS CODE IS APPLICABLE THROUGHOUT PME, REGARDLESS OF LOCATION OR ROLE.

WHAT DOES THIS CODE COVER?

This Code outlines the standards of ethical business behaviour expected of employees of PME. As a business, we are also subject to the laws of the locations in which we operate. Where this Code contains higher standards of behaviour than local laws, rules or customs, this Code will apply.

WHO MUST FOLLOW THIS CODE?

This Code applies to all people who work for PME, as an employee, director, or officer, or people working under contract (where contractually required), regardless of location or role ('employees').

RESPONSIBILITIES OF THOSE WORKING FOR PME

All PME employees must:

- Comply with this Code, the PME Rules and the applicable laws that apply to their work.
- Seek to ensure that others who represent PME, including business partners, comply with this Code, applicable laws and

the PME Rules.

- Where possible, influence our joint venture, consortium and alliance partners and seek to have them comply with standards consistent with this Code, applicable laws and the PME Rules.
- Seek advice if there is any doubt as to the proper course of action.
- Promptly raise known, or suspected, breaches of this Code, the PME Rules and/or the applicable law.
- Cooperate in investigations of possible breaches of this Code, including in regard to their own behaviour.
- Not retaliate against another person for reporting actual, or suspected, breaches of this Code.
- Demonstrate leadership and diligence to ensure compliance with this Code, the PME Rules and the applicable laws.

Queries on the meaning of this Code, or concerns about actual or potential breaches, must be promptly raised.

It may seem easier to keep silent, or look the other way, but our commitment to working according to our values means we must never ignore an issue that needs to be addressed.

RESPONSIBILITIES OF THOSE WHO SUPERVISE OTHERS

Supervisors and managers must take all reasonable steps to ensure that the people for whom they are responsible are aware of, and uphold, the behaviours outlined in this Code.

This includes:

- Demonstrating behaviour consistent with this Code.
- Undertaking activities to foster a culture in which employees understand their responsibilities and feel comfortable raising concerns without fear of retaliation (victimisation).
- Ensuring that this Code and the PME Rules are accessible understood and applied.

2 Ethical Business Practices

2.1 BRIBERY AND CORRUPTION

PME PROHIBITS BRIBERY AND CORRUPTION IN ALL FORMS, WHETHER DIRECTLY OR THROUGH A THIRD PARTY.

OUR COMMITMENT

PME does not permit, or condone, any form of bribery or corruption.

- 'Bribery' involves the offering, giving, granting, promise or acceptance of any payment, gift, promise, benefit, favour or anything of value, whether directly or through a third party, which is:
 - To or from any person or entity (whether a government official, a private business person or an associate of any of them).
 - For the purpose of improperly securing a private or business benefit or advantage, or for the improper performance of a function or activity.
- 'Corruption' involves the abuse of a position of employment, authority or trust to gain an advantage in breach of duty.

Such behaviours are illegal in most countries. A breach of anti-bribery or corruption laws is a serious offence, which can result in significant fines to PME and its employees and/or imprisonment. Even the perception of bribery, or corruption, can have a serious impact on the reputation of PME and its employees.

PME also prohibits making 'facilitation payments', even where permitted under local laws. Facilitation payments are typically payments involving small sums to an individual within government, or other public authority, or within a private entity to obtain routine services that are not related to obtaining an undue advantage.

YOUR RESPONSIBILITY

You must never:

- Engage in any form of bribery or corruption.
- Make a facilitation payment.
- Authorise, undertake or participate in schemes to give any improper benefit, kickback or secret commission to anyone.
- Offer, promise or give a cash or cash equivalent payment of any kind to a government official or to any other person for the purpose of obtaining improper advantage.
- Use any third party to do something that PME is prohibited from doing itself.
- Give anything of value to any third party when there is any suspicion that the third party, will engage in bribery, corruption or other prohibited conduct in relation to PME.

You must:

- Be aware that gifts and hospitality, agency arrangements, political donations and charitable contributions may, in certain circumstances, constitute, or give, the appearance of bribery and as such need to be carefully considered so that this does not occur (see Sections 3.3, 4.2, 4.3, 6.1 and 6.2 of this Code).
- Report requests for any improper payments such as bribes or facilitation

payments to your supervisor without delay.

- If you have any doubt about the legitimacy of a payment or gift that you have been requested to make, immediately seek the advice of the supervisor for your department or management.
- Communicate the requirements of PME to subcontractors, suppliers and other business partners, and where possible, impose appropriate standards on the business partners by contract, and ensure that their activities are appropriately monitored over the life of the contract.
- Ensure all transactions are accurately recorded in reasonable detail in the books and records of PME.
- Plan against circumstances where bribery or corruption may occur.
- Report any bribery or corruption concerns immediately so that appropriate action can be taken.
- If you are a manager, identify and assess potential risks for bribery or corruption.

If a payment, which would otherwise be in breach of this Code, is requested to be made as a result of a direct, or indirect, imminent threat to the health or safety of any employee, agency contractor or officer, or any accompanying person or the family of any of them, it must be reported immediately to the supervisor for your department or management.

2.2 GIFTS AND HOSPITALITY

GIFTS AND ENTERTAINMENT GIVEN AND RECEIVED WITH THE INTENTION OF UNDULY INFLUENCING BUSINESS DECISIONS ARE A FORM OF BRIBERY AND ARE PROHIBITED.

OUR COMMITMENT

Legitimate and reasonable gifts and hospitality given and received in the course of business, which are for a valid business purpose or relationship, are permitted by PME if they:

- Are occasional and are of modest value.
- Comply with the law, local business practice and the PME Rules.
- Are not intended or appear to be a reward or encouragement for preferential treatment.

PME does not permit the offering or accepting of:

- Loans, cash or personal cheques.
- Product or service discounts that are not available to all employees, unless arranged by someone within PME having the authority to do so.
- Gifts, favours or any form of hospitality or entertainment in return for, or in exchange for, business services or information.
- Gifts or hospitality of an inappropriate nature or at inappropriate venues.

YOUR RESPONSIBILITY

You must:

- Exercise care when offering or accepting gifts and hospitality in order to protect yourself and PME against allegations of improper behaviour, conflict of interest or bribery.
- Consider whether accepting a gift or hospitality from a third party might be seen to adversely affect the reputation of PME or place you under an explicit or implied obligation towards that party, even if none is intended. If there is any ambiguity, you should refuse.
- Exercise judgement in determining what is occasional, proportionate and modest. The higher the monetary value of the gift or hospitality, the greater the level of transparency that is required.
- If uncertain of the appropriateness of a gift or hospitality disclose it to your supervisor or manager.
- Never request a gift or hospitality of any kind from a business partner.

2.3 WORKING WITH SUBCONTRACTORS AND OTHER THIRD PARTIES

SUBCONTRACTORS AND OTHER THIRD PARTIES WITH WHOM PME WORKS CAN MAKE A SIGNIFICANT CONTRIBUTION TO THE SUCCESS OF PME. WE AIM TO HAVE EFFECTIVE BUSINESS RELATIONSHIPS WITH SUBCONTRACTORS AND OTHER THIRD PARTIES, AND TO ENCOURAGE THEM TO ADOPT SIMILAR BUSINESS PRACTICES AND PROCEDURES TO THOSE OF PME.

OUR COMMITMENT

Through their actions, subcontractors and other third parties can directly impact the financial performance and profitability of PME, as well as adding to, or detracting from, its reputation.

Wherever possible, PME seeks to establish a collaborative relationship with subcontractors and other third parties. In general terms, PME seeks subcontractors and other third parties who share our commitment to:

- Lawful business practices conducted according to a high standard of ethical behaviour and conduct.
- Providing a safe and healthy workplace.
- Minimising the impact on the environment.
- Management practices that respect the rights of all employees and the local community.

YOUR RESPONSIBILITY

You must:

- Carry out enquiries before selecting and engaging a subcontractor or other third parties such as agents and representatives to determine they do not present unacceptable reputational risks, including bribery or corruption, political, security, trade sanction, international boycott or other such risks. The enquiries will vary depending on the nature of the proposed relationship,

but will typically seek to ensure that:

- The party is reputable, competent and qualified to perform the work for which it is being hired.

- The compensation sought is reasonable (in line with industry standards) and commensurate with services provided.

- The proposed arrangement complies with all applicable legal requirements.

- There is no conflict of interest that would make engagement of the party inappropriate (e.g. an outside interest or association of the responsible PME person with the third party, or the third party is a government official, or a close relative of a government official).

- Where such enquiries result in negative indicators or 'red flags', then an assessment process, which is recorded, should be undertaken which involves the legal team and the Business Conduct Representative in your department.
- Only make procurement decisions based on the best value received, taking into account the merits of price, quality, performance, capability and suitability.
- If you are aware of, or suspect, improper behaviour by a subcontractor or other third party, take action to investigate and rectify the situation.
- Only engage subcontractors or other third parties through a formal contract, which must be approved in accordance with the relevant delegated authorities.

- Take special care when engaging agents or representatives. All agreements with agents and representatives must be approved by a person in your department with the authority to do so and in accordance with the PME Rules. There must be transparency and accurate reporting of all agency fees and the services provided.

- Confirm that the subcontractor or other third party understands PME expectations and this Code and is contractually bound to meet standards consistent with this Code, where possible.

Wherever a member of PME has a controlling position in a joint venture or other similar arrangement, then we require that the standards of behaviour contained in this Code be adopted. In all other circumstances, we will seek to influence other members included in the joint venture to adopt such standards.

The standards of behaviour contained in this Code must never be waived. If local conditions make it difficult to find third parties who meet our criteria, or you have any doubt about the use or behaviour of third parties, you must discuss the matter with a relevant senior manager in your department.

2.4 CONFLICTS OF INTEREST

ALL EMPLOYEES MUST ENSURE THEIR PERSONAL ACTIVITIES AND INTERESTS DO NOT CONFLICT WITH THEIR RESPONSIBILITIES TO PME. IT IS IMPORTANT TO AVOID EVEN THE APPEARANCE OF A CONFLICT OF INTEREST.

OUR COMMITMENT

PME is committed to avoiding conflicts of interest between personal and business interests that impact the interests of PME. Where an unavoidable conflict arises it must be actively managed.

A conflict of interest arises when an employee has a personal interest in a business decision in which they are involved which affects or could affect his or her judgment, objectivity, independence, or prejudice the interests of PME.

Conflicts of interest can arise in many ways, but common examples involve employees:

- Holding outside jobs and affiliations.
- Being influenced by or influencing jobs and affiliations of close relatives.
- Holding investments in our clients or our major suppliers.
- Offering or accepting gifts and hospitality.
- Pursuing business opportunities with PME for personal gain.

YOUR RESPONSIBILITY

You must disclose any conflict of interest or potential conflict of interest that affects you to your supervisor or manager.

All supervisors and managers must ensure that conflicts of interest which are brought to their attention are reviewed in a fair and timely manner, and that the outcome is advised to the employee.

You must:

- Avoid any business dealings and personal relationships that cause, or may cause, or create the appearance of a conflict with your obligations to PME.
- Remove yourself from any decision-making process where you have an interest that influences, or may be perceived as influencing, your ability to make an objective decision and to fulfil your responsibilities to PME.
- Not be directly involved in the potential employment or employment of a relative, close friend or associate – this should be undertaken by management

that is independent of any relationship.

- Promptly advise your supervisor or manager in writing of any outside activities, financial interests or relationships that may involve you either in an actual conflict of interest or the appearance of one.

2.5 ANTI-COMPETITIVE CONDUCT

PME IS COMMITTED TO THE PRINCIPLES OF FREE AND FAIR COMPETITION. PME WILL ALWAYS COMPETE VIGOROUSLY BUT FAIRLY, AND COMPLY WITH ALL APPLICABLE COMPETITION LAWS.

OUR COMMITMENT

PME is committed to not engaging in anti-competitive conduct including:

- Behaviour in collusion with competitors referred to as 'cartel behaviour' which includes:
 - Price fixing: Agreements involving fixing the selling price to a customer or the buying price to be paid to suppliers, including agreeing maximum or minimum prices formulae for pricing or discounting goods and services and agreed rebates and allowances or credit terms.
 - Output restrictions: Agreements between competitors to prevent, restrict or limit production, capacity or supply of goods or services.
 - Allocating customers, suppliers or territories: Agreements between competitors to divide or allocate customers, suppliers or territories among themselves.
 - Bid rigging or collusive tendering: Agreements between competitors in order to ensure that bids for a tender are submitted (or withheld) in a

manner agreed by the bidding participants.

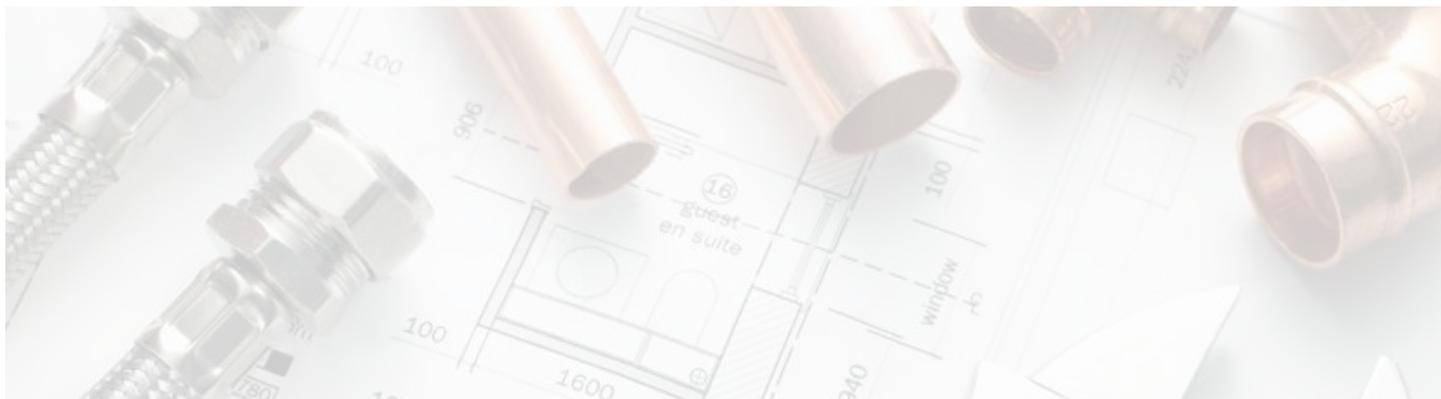
- Exclusionary provisions – agreements between competitors which have the purpose of preventing, restricting or limiting dealings with a particular person or class of persons
- (e.g. agreeing not to supply or acquire goods or services from a particular person).
- Arrangements that substantially lessen competition – the making or giving effect to any contract, arrangement or understanding which has the purpose or likely effect of substantially lessening competition.
- Misuse of market power – for example:
 - Taking advantage of a substantial degree of market power.
 - Having a substantial market share and engaging in below cost pricing for a sustained period, for the purpose of substantially damaging a competitor, preventing the entry of a person

into a market or deterring or preventing a person from engaging in competitive conduct.

- Unconscionable conduct – taking advantage of someone's inability to look after their own interests, particularly relevant in consumer transactions.
- Misleading or deceptive conduct – behaviour is misleading or deceptive if it is untrue or conveys an untrue impression irrespective of what was intended to be conveyed.

In some cases, these requirements may be greater than required by local law. In such cases, compliance with these requirements takes precedence over local law.

The consequences of ignoring laws in relation to anti-competitive practices may be serious. PME and its employees may be subject to criminal and civil proceedings resulting in damage claims, significant fines and possibly imprisonment. The reputation of PME may also be damaged through adverse publicity, and jeopardising customer and public goodwill.



YOUR RESPONSIBILITY

You must:

- Fully comply with both the spirit and the letter of the applicable competition laws.
 - Maintain the independence of PME in respect of judgement in pricing, marketing and selling of our services and never engage in anti-competitive conduct.
 - Consider the appearance and implications of interacting with a competitor, whether in a business or personal setting. Avoid any action from which anti-competitive conduct could be implied.
 - Contact the supervisor in your department if you have any concerns about:
 - Possible or actual exchange of competitively sensitive information, directly or indirectly, with a competitor.
 - Contact initiated or proposed by a competitor, which may give rise to anticompetitive conduct.
- Not obstruct a competition authority by providing false or misleading information, concealing or destroying documents, or alerting any third party to the fact of an investigation.
 - Maintain ethical and honest communications.
 - Not knowingly provide incorrect information.
 - Not tell half truths.
 - Not allow our business partners to labour under a misapprehension.
 - Not coerce, bully, harass, threaten or extort our business partners.

Employees with responsibilities for procurement should be alert to instances where PME may be subjected to anti-competitive behaviour by third parties who supply products and/or services to PME. If you have concerns in regard to this, they should be raised with the management.

2.6 INTERNATIONAL TRADE CONTROLS

PME WILL COMPLY WITH ALL NATIONAL AND INTERNATIONAL LAWS, REGULATIONS AND RESTRICTIONS RELATING TO THE MOVEMENT OF MATERIALS AND SERVICES AROUND THE WORLD WHICH ARE APPLICABLE TO ITS BUSINESS.

OUR COMMITMENT

Most countries have laws and regulations that apply to the movement of goods, services and intellectual property across national borders. Many countries are also signatories to international export control treaties which govern the export of goods and services, including information and technology.

Trade restrictions, sanctions and bans may apply to (among other things):

- Exports to a particular country.
- Imports, or dealings in property originating from a particular country.
- Travel to and from a particular country.
- New investments and other dealings in a particular country or with designated individuals.

The consequences of ignoring trade laws and sanctions are serious. Individuals may be subject to fines and possibly imprisonment. The reputation of PME may also be severely damaged, and it may be subject to criminal and civil penalties.

YOUR RESPONSIBILITY

You must:

- Know and follow the sanctions and international trade control laws and regulations of all countries in which you operate or that apply to transactions relevant to your role within PME.
- Ensure that accurate and complete information is provided to government authorities, when required, including import and export declarations.
- Seek to ensure that all transactions comply with all applicable laws that restrict

or prohibit dealings involving particular countries, individuals or entities and prohibited end-uses, and that your actions do not cause violations by other parties.

- Never proceed with an export or other business transaction if there is any doubt about its legality or propriety contact the supervisor in your department if in doubt.
- Never participate or allow PME to participate in cross border trade between a sanctioned country and the country that has imposed such sanctions.
- When engaging and monitoring subcontractors and other third parties, consider the risks relating to international trade controls – such as international trade treaties and sanctioned boycotts, security considerations, prohibited passing of intellectual property and sensitive information.

3 Use of PME Assets and Resources

3.1 PROTECTION OF ASSETS OF PME

ALL EMPLOYEES MUST PROTECT THE ASSETS OF PME. ASSETS MUST NOT BE USED FOR ILLEGAL PURPOSES OR FOR PURPOSES NOT RELATED TO THE BUSINESS OF PME.

The assets of PME include funds, supplies, construction and mining plant and equipment, computers, telephone networks, fuel, electricity, intellectual property (including ideas and know-how which employees develop in the course of their work for PME, confidential information (including customer/supplier lists and other market data), along with any information to which employees have access as a result of their work responsibilities.

These assets are made available to you to undertake the business of PME.

YOUR RESPONSIBILITY

You must:

- Not take or use any assets of PME for your own use or make them available to other persons for a non-PME use, unless authorised by a person in your department with the appropriate authorisation.
- Not use these assets for personal gain or personal business, nor allow any other person not employed or authorised by PME to use them.
- Take care to prevent waste, loss, damage, misuse, theft or misappropriation of assets of PME.
- Comply with applicable PME Rules regarding the use and transfer of assets of PME (including the applicable delegated authorities).
- Seek to ensure third parties follow the PME Rules when dealing with assets of PME.
- Prevent non-authorised personnel from accessing assets (including facilities) of PME.
- Be careful where and when you discuss any confidential information of PME and how you store it.

Reasonable personal use of information and communications technology such as mobile phones, iPads and laptops is permitted in accordance with Section 5.3 of this Code.

Each employee has a duty to PME to report any instance of suspected theft or misuse of PME assets in accordance with this Code.

PME also expects you to respect the assets of others, and never knowingly damage or misappropriate the assets of others, irrespective of whether the assets are physical or intangible (for example, intellectual property and confidential information).

3.2 ACCURACY OF REPORTING AND DISCLOSURE

ALL INFORMATION CREATED AND MAINTAINED AS A RESULT OF THEM BUSINESS ACTIVITIES OF PME MUST ACCURATELY REFLECT THE UNDERLYING TRANSACTIONS AND EVENTS.

OUR COMMITMENT

PME will:

- Comply with all applicable rules, laws and regulations in relation to business reporting in each jurisdiction in which it operates.
- Follow procedures to ensure transactions are properly authorised, and accurately and completely recorded in the relevant accounts and records, as required by law and applicable PME Rules.
- Retain and dispose of the data it creates according to the PME Rules and applicable laws and regulations.

Senior financial officers and others responsible for the accuracy of financial reporting have an additional responsibility to ensure that adequate internal controls exist to achieve truthful, accurate, complete, consistent, timely and understandable financial and management reports.

YOUR RESPONSIBILITY

You must:

- Always follow the applicable reporting standards and processes applicable for your department
- Never falsify, conceal, alter, or otherwise tamper with information, or create misleading information. Such conduct may constitute fraud, and can result in civil or criminal liability for you and for PME.
- Not misrepresent financial transactions or any other transactions or events, as this may constitute falsification of company records. Such conduct may constitute fraud, and can result in civil or criminal liability for you and for PME.
- If you have any concerns about the validity of any reporting process or record-keeping activity, or believe you are being asked to create false or

misleading information, you must immediately report those concerns to your supervisor or manager or contact the Business Conduct Representative for your department.

- Not destroy, deface, or make unrecoverable documents that are, or are likely to be, the subject of litigation or any regulatory investigation.

3.3 USE OF INFORMATION AND COMMUNICATIONS TECHNOLOGY

ALL COMPUTER HARDWARE, SOFTWARE AND SYSTEMS ARE THE PROPERTY OF PME, AND ARE PROVIDED TO BENEFIT EMPLOYEES OF PME FOR LEGITIMATE BUSINESS PURPOSES.

Information and Communications Technology (ICT) includes all computing equipment together with the use of all associated networks, Internet access, email, hardware, mobile devices, dial-in and remote access, data storage, computer accounts, software (both proprietary and those developed by the company), telephone services, including voice mail, and social media.

YOUR RESPONSIBILITY

Employees using ICT of PME must comply with the following regulations:

- The ICT facilities are provided for employment and related purposes. They must not be used for excessive personal communication or unlawful or unapproved activities.
- PME is committed to correct software licensing. No software is to be installed on the computer network or individual computers without the knowledge and approval of the person responsible for ICT in your department.
- Objectionable or offensive material is not to be accessed by, created or placed on or transferred using company ICT.
- To the extent permitted by law, PME reserves the right to monitor or audit use of the ICT of PME and to access, review and disclose data stored on PME systems for maintenance, business needs, investigation of suspected or reported breaches of the Code, or breaches of the law or to meet a legal or Business Standard requirements.
- The ICT must not be used to harass, bully, vilify, coerce or unlawfully discriminate against others.
- The ICT must not be used for hacking or any other unlawful purpose.
- The ICT facilities must not be used to make statements prejudicial to PME interests.

**HEAD OFFICE:
POSTAL ADDRESS**

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