

## Business Integrity Policy

Remington Group is committed to contributing towards the sustainable development and good governance of its business endeavours in the locations where it operates in PNG. Exploitation or corruption undermines that objective; it erodes the trust, drives away our customers, and undermines the rule of law upon which our social safety and security depends on, and increases the costs and unpredictability of doing business. It significantly reduces our ability to produce positive outcomes for the business. Bribes and other corrupt payments are illegal. In addition to compliance with this Policy, our employees and contractors have a duty to uphold and comply with the laws and jurisdictions in PNG.

Our Code of Conduct sets out the standards and expected behaviours that guide how we do business. These make clear that we are implacably opposed to corruption, which goes against our core values of integrity and accountability. We will neither give nor accept bribes nor permit others to do so in our name (**Remington Technology Limited, Fuji Xerox Business Centre, Graphos Limited (BizPrint) and Premier Business Solutions**), either in our dealings with public officials or with suppliers and customers. We are committed to operate to the same high standard of integrity wherever we work.

### 1. Purpose of the Policy

The purpose of this Policy is to set out the standards of conduct required at every level within the Remington Group, our subsidiaries, contractors and associates on the part of those with which we do business and those who work on our behalf, in combating fraudulent behaviour of all types in the business.

The Policy:

- Describes the principal bribery and corruption risks for Remington Group.
- Sets out the consequences of non-compliance with the Policy.
- Identifies the principal related guidance to eliminate corruption at Remington Group.
- Provides the foundation for the associated Business Integrity Prevention of Corruption Procedures (Procedures), which are summarised on pages 4-9.

### 2. Who is covered under this policy

This Policy and its accompanying Procedures apply to all employees and contractors of Remington Group. This includes, but is not limited to employees working at all levels and grades, senior managers, officers, directors, employees, consultants, contractors, trainees, part-time and fixed-term employees, casual staff and volunteers.

## Responsibility for Implementation of the Policy

The Office of the Chief Executive Officer in conjunction with the Executive Leadership Team, have overall responsibility for the effective operation of this policy.

All staff are responsible for their own compliance with this policy and for ensuring that it is consistently applied. All staff should ensure that they take the time to read and understand it. Any breach of this policy should be reported to the relevant general Manager or people Leader.

Questions regarding the content or application of this policy should be directed to the Chief Finance Officer, Group Manager Human Resources or the Chief Executive Officer.

### 3. What you need to know (Definitions)

For the purposes of this Policy, corruption is defined as “any act intended to result in the misuse of entrusted power for a personal or corporate gain.” This includes bribery, conflicts of interest, theft, extortion, fraud and misuse of company assets.

Bribery is defined as “the act of promising, offering, or giving an advantage to a person or entity, either directly or indirectly, so that the person or entity perform or refrain from performing, an act in breach of their business or public duties.”

Common examples of bribery include:

- Cash or other forms of payment that is used to secure a contract or obtain a license.
- Improper donations to political parties or related organisations.
- Excessive gifts or entertainment intended to influence the recipient to undertake a particular course of action.
- For the purpose of this policy, a bribe may consist of anything of material value, not simply a payment of cash, and may include the provision or receipt of:
- Lavish or disproportionate gifts and entertainment.
- Donations with an ulterior motive.
- Payment of travel expenses or accommodation for a customer or official when there is no underlying business purpose for a trip.
- Use of corporate assets for activities which are unrelated to our business or approved charitable purposes.

**Conflicts of interest** can arise when financial or personal considerations may influence or appear to influence the judgement or actions of our employees in performing their duties, or have the potential to do so. Such conflicts can occur when private and company interests are mixed or when business or governmental decisions are based on private interests.

**Extortion** is defined as the illegal use of an official position or powers to obtain property or funds.

**Fraud** can be defined as any deception deliberately practiced in order to secure unfair or illegal gain.

#### **4. The exercise of improper influence**

We will not, either directly or indirectly through intermediaries or other third parties, solicit, receive, offer, promise or provide money or anything of material value (including confidential or sensitive business and financial information and intellectual property), or otherwise exercise improper influence in our business or governmental relationships, with the intention of obtaining a contract, permit or any other specific benefit or any improper advantage in the conduct of business.

This applies to our relationships with governmental organisations and officials and in our dealings with other businesses or civil society organisations. We will not tolerate any such activity by our employees, agents, contractors or business partners.

The question of what constitutes 'material value' will vary according to context. It will be defined by:

- The context of the potential inducement.
- Whether what is offered or promised has sufficient potential value to the recipient, whether monetary or by its nature, to potentially sway the recipient's opinions or actions.

This Policy covers the asking and receipt of bribes or other inducements from third parties by the Remington Group employees as well as the provision and payment of bribes.

#### **5. Business Integrity and Prevention of Corruption Procedures**

##### **5.1 5.1 Offering or providing gifts, entertainment and hospitality**

The exchange of modest gifts and entertainment may help to build goodwill and this Policy is not intended to detract from the desirability of fostering good relations with business partners and other stakeholders through legitimate, occasional social interactions. However, offering or providing inappropriate gifts or entertainment may cause embarrassment to the Company and damage our reputation. Particular concerns arise when the offering of gifts and entertainment may be connected in some way with an actual or potential business transaction or regulatory approval. Even if the intent is not corrupt, there is still a risk that a recipient or an objective third party may perceive the gift or entertainment to be an attempt to gain an improper advantage.

Any gift or entertainment is always unacceptable if it:

- Is offered or made in exchange for a contract, a permit or any other specific benefit.
- Is offered to obtain an improper advantage in the conduct of business.
- Is in breach of PNG or international bribery laws.
- Would be considered unacceptable if offered by a supplier or business partner to one of our own employees.
- Would, if it became public, adversely affect our reputation.

## **5.2 Receiving gifts, entertainment and hospitality**

We have a responsibility to ensure that our dealings with suppliers are based on objective decisions and are not influenced by gifts or favours. We prohibit employees from soliciting or receiving gifts and entertainment including favours, goods, gratuities, money and services that:

- May create a sense of obligation.
- May influence or be perceived to influence their business judgement.
- May create, or appear to create, a conflict between an employee's personal interests and those of their employer or of the Remington Group as a whole.

## **5.3 Conflicts of interest**

Employees must avoid actual or perceived conflicts of interest, involving themselves or close relatives and where such a conflict has the potential to arise must draw this to the attention of their line manager and any other person designated by their Business Unit or corporate entity for this purpose. Please refer to Remington Group Conflict of Interest Policy.

## **5.4 Facilitation payments**

We prohibit the making of facilitation payments. A facilitation payment is a payment of nominal value made to a low-level government official whose duties are essentially administrative in nature in order to secure the performance of routine governmental non-discretionary actions to which the payer is legally entitled.

Examples of such payments include for the processing of a tender application or giving money (lunch money) to officials, when all relevant requirements have clearly been met.

We recognise that occasionally payments may be demanded under duress. Duress may be defined as a situation of actual or threatened violence, imprisonment or other personal threat to coerce person to enter into an agreement or to do an act against their will. The threat may be to the person themselves or to others.

We do not expect any employees to compromise their safety, security, or that of others in order to comply with our Policy, but we do require employees to report any incidence where they have been threatened or intimidated so that appropriate action can be taken to prevent any recurrence.

## **5.5 Use of company assets**

We will not, either directly or indirectly through intermediaries and other third parties, offer, promise or provide money or anything of value or otherwise exercise improper influence in our business relationships, with the intention of obtaining a contract, permit or any other specific benefit or any improper advantage in the conduct of business. This applies both to our relationships with governmental organisations and officials and in our dealings with the private sector. We will not tolerate any such activity by our employees or business partners.

The use of company assets, such as premises, equipment or vehicles, free of charge represents something of value for the intended recipient. Company assets must not be provided for the personal or discretionary use of customers, public officials or other third parties where there is no underlying proper business purpose.

#### **5.6 Interactions with government officials and lobbying**

We promote honest and constructive engagement with our host governments at all levels. We will consult widely with people who are affected by our activities and we will proceed in our dealings with governments and public officials in a transparent and ethical way.

We will not, either directly or indirectly through intermediaries and other third parties, offer, promise or provide money or anything of material value or otherwise seek to exercise improper influence in our business relationships, with the intention of obtaining a contract, permit or any other specific benefit or any improper advantage in the conduct of business. This applies both to our relationships with governmental organisations and officials and in our dealings with the private sector. We will not tolerate any such activity by our employees or business partners.

#### **5.7 Charitable donations, social and community development activities**

We make charitable contributions and social and community investments with the objective of promoting sustainable community development, combating poverty and disease, protecting the environment and developing the capacities of people or institutions in provinces where we work. We take care, however, that such donations do not work primarily to the benefit of a particular government official, politician or party and put controls in place to ensure that they are not misused by third parties. Donations and social and community investments must not be made if they either create or have the potential to create, the perception of impropriety.

In our dealings with communities and their representatives, we will act transparently and in good faith.

#### **5.8 Sponsorships**

Sponsorship may not be promised, offered or provided in exchange for a contract, permit or specific regulatory benefit. It must not be offered to obtain an improper advantage in the conduct of business or if it is likely to be perceived as having this intention.

#### **5.9 Retention and payment of intermediaries and mergers, acquisitions, joint ventures and associates**

Our reputation can be damaged by the actions of third parties such as advisers, suppliers, agents, contractors, lobbyists and joint venture partners and the Remington Group may find itself liable for their actions. It is never acceptable for a third party to carry out an act on Remington Group's behalf which, were it done by Remington, would be a breach of this Policy.

In order to protect against the risk of bribes being paid indirectly, we are committed to:

- Taking all reasonable steps to ensure that our business partners understand and comply with our Business Integrity Policy and Procedures.
- Investigating the reputation and qualifications of our business partners and carrying out formal due diligence, where appropriate, to satisfy ourselves of their integrity and bona fides.
- Putting in place appropriate controls and checks to monitor the use of Remington Group's money by third parties purporting to act on our behalf.
- Ensuring that joint ventures and associate companies have equivalent processes in place.
- We are committed to thoroughly investigating the background, reputation, ethical and cultural values of any company we invest in or acquire and any partner with which we decide to enter into a joint venture, and of the nature of investments we thereby inherit.

### **5.10 The safety of our people**

Remington Group employees must be free to carry out their duties without fear of intimidation or threat of violence. The safety and security of our employees is our paramount concern. We however, do not expect our employees to compromise their safety or security or that of others in order to comply with the terms of this Policy.

Employees must, immediately report any incident where they have been threatened or intimidated to carry out an act which may result in a breach of this Policy to the designated responsible person within their Business Unit (General Manager), copied to the Group Human Resource Manager and Chief Executive Officer. After appropriate internal consultation, such incidents must also be reported to the relevant authorities in order to prevent any recurrence.

### **5.11 Employee Responsibilities**

It is everyone's responsibility to uphold Remington Group's reputation and demonstrate accountability and integrity. This means that we must understand and comply with Remington Group's Code of Conduct, the Business Integrity Policy and the Business Integrity Prevention of Corruption Procedures.

You must also seek advice and consult if you are unsure whether the course of action is correct to the designated person in your Business Unit. You must have the courage to report and raise concerns on conduct that goes against our values and standards, as described within the Business Integrity Policy and the Business Integrity Procedures. All employees and contractors must be made aware of this Policy and its requirements in their induction.

Communication and awareness materials are available to ensure that the Policy, the requirements of the Business Integrity and Prevention of Corruption Procedures and supporting tools are regularly communicated throughout the Remington Group through appropriate modes of communication, management engagement, briefings and training.

## 6. Monitoring and Reporting

### 6.1 Monitoring, reporting and assurance

Adherence to the Business Integrity Policy and implementation and evolution of its associated program is subject to regular reporting and monitoring, and annual assurance to enable the determination any development or adaptation of Policy, controls and training that may be required.

### 6.2 Consequence of breach

Employees, contractors and suppliers must report any breaches, or potential breaches of this Policy. Violations of this Policy will lead to disciplinary action in accordance with the Group Human Resource disciplinary procedures. Disciplinary actions may involve sanctions up to and including summary dismissal.

The Remington Group is committed to reporting all instances of corruption and other forms of dishonesty to the relevant authorities and to facilitating criminal action against the individual(s) concerned and we will seek redress for any losses arising from such actions.

At Remington Group, we do not tolerate any form of retaliation against employees raising concerns in good faith. Allegations of retaliation against or harassment or intimidation of an employee by others as a result of a report to the Chief Executive Officer will be investigated and appropriate action taken, including disciplinary action up to and including dismissal of the employee(s) responsible for reprisals.

### 6.3 Your Voice is Important (Whistleblower's right)

**Your Voice** is important. You can confidently approach the Chief Executive Officer if you have raised matters with your people leader, General Manager or Human Resource Department and still noticed unusual practices in your workplace or dealings that seem suspicious and does not meet the standard in which Remington Group conducts its business. Our employees, contractors, suppliers, business partners and other external stakeholders can also use this channel to report and raise concerns about conduct which is contrary to our values and standards, as described in our Code of Conduct, Core HR Policies, this Policy and the accompanying Business Integrity Prevention of Corruption Procedures or the Laws of Papua New Guinea.

**Group Integrity** through the Office of the Chief Executive Officer provides the avenue for you to confidently raise alarm about concerns or issues that goes against what is right and fair. Anything that comes through this channel is kept very private and confidential.

## 7. Policy review and update

The Chief Executive Officer has overall responsibility for the review and update of this policy at the beginning of each year or more regularly as required.

## 8. Agreement

All company employees, contractors or temporary staff are bound by this policy as long as they have any form of agreement in employment to and/or service with the Remington Group.

I acknowledge that I have read and I understand the above.

Name	
Signature	
Date	

**\*\* Please read, sign and date, and return.**