



Code of Conduct

March 2012



# Code of Conduct

This Namosi Joint Venture (NJV) Code of Conduct establishes the fundamental values by which NJV operates. This Code of Conduct sets out standards for appropriate ethical and professional behaviour that apply to all personnel working for NJV - including employees, contractors and consultants.

## **Health & Safety**

The safety and health of our employees, contractors and visitors is paramount. Our goal is for all employees to return home in the same safe condition as they arrived at work. Our target is to achieve zero injuries in the workplace by continuing to develop a culture of safe behaviour.

We operate in accordance with our safety management system and provide effective training and the right equipment to enable people to work safely. We comply with all relevant laws of Fiji.

We do not condone the use of drugs, alcohol, kava or other substances that may impair the ability to function effectively in our work environment or which could put at risk the health and safety of ourselves or those around us.

## **Environment**

NJV is committed to achieving excellence in the standard of environmental performance in all our activities and we continuously strive to improve our overall environmental performance. This includes identifying opportunities for the efficient use of energy and water, minimising waste and applying sound practice to land use planning and rehabilitation. As a minimum standard, we will comply with all relevant environmental laws of Fiji.

We will work with government, traditional owners and local residents to identify and address environmental matters associated with our activities.

## **Community**

Our goal is to be the 'Miner of Choice' for the communities where we explore and operate. We recognise and respect the culture, values, traditions and heritage of the communities in which we operate. Our aim is to have an open and honest long-term partnership with those communities in which we operate that will be mutually beneficial during NJV's presence and beyond.

We will adhere to the laws and regulations of Fiji and apply sound principles and practices in all related fields of work with those communities. We observe appropriate local and national protocols and policies for land access and land use.

NJV aims to be a good corporate and community citizen. This includes appropriate donations and sponsorship programmes.

## **Professional Behaviour**

We act with honesty and integrity.

We conduct ourselves professionally in interactions with other Employees and in representing NJV in the community. Business relationships must be maintained in a manner which is consistent with the principles of respect for others, integrity and fairness.

NJV is committed to maintaining a professional relationship with all levels of government and their agencies and employees in an honest, transparent and ethical manner.

All forms of discrimination and harassment are prohibited. NJV is committed to equal opportunity and personal rights in all aspects of its operations.

## **Use of Information**

The accuracy, use and handling of information is critical to NJV's integrity and reputation. Ensure that information is recorded honestly and accurately and is made known to your relevant manager so that NJV is fully informed of its activities.

All information relating to NJV must be kept properly secured. When handling confidential information, ensure that any papers or files are stored properly and not left in places that are visible. Information should not be left on computer screens. Exercise care in conversations outside NJV.

Only disclose information about NJV which is specifically designed and authorised for publication. All other information about NJV and its activities (including statements to the media) can only be released to legitimately interested parties by Employees who are authorised to do so.

Never make improper use of knowledge, information, documents or other NJV resources obtained in the course of your employment with NJV. Do not use confidential information or information about NJV that is not publicly available (inside information) for personal gain or that of others. Employees have an obligation not to misuse confidential or inside information and to respect the privacy of information and this continues after employment with NJV has ceased.

## **Intellectual Property**

Intellectual property including proprietary technology, knowledge, ideas, discoveries, designs and inventions developed during the course of employment are to be protected at all times. Unless authorised, intellectual property, documents and other related information should never be disclosed to third parties even after employment

with NJV has ceased.

## **NJV Property**

Do not misuse NJV's funds or assets nor assist others to do so. NJV assets are to be safe-guarded and not used for private purposes. Employee's services during work time are not to be used for private work or personal gain.

Use computer facilities appropriately. Unauthorised use, manipulation or other interference will be treated seriously. Private passwords to computer files should be kept confidential with unauthorised access to confidential information prohibited. All computer software must be properly licensed and no personal software is to be used or installed on NJV-supplied computer systems.

## **Act within your Authority**

NJV has delegated authority levels for its Employees. Managers will inform of authority levels for relevant roles and Employees must comply with these delegated authorities. Seek clarification from managers when uncertain of authority level or matters relating to policy.

## **Conflicts of Interest and Outside Activities**

Employees wanting to serve (or currently serve) as a director or trustee of another organisation, where that service or role potentially conflicts with NJV's interests (either commercially and/or due to the time required to fulfil the role), advice and approval must be sought from the Country Manager. Employees must not undertake any other work for remuneration unless they have written approval from the Country Manager.

Employees and their immediate family must avoid holding any financial interest in an organisation that provides goods or services to NJV. Any potential conflicts of interest must be disclosed to the Country Manager.

Do not use your NJV role as authority for political interests at any time. NJV does not support political parties, members of political parties or independent politicians. Employees must not do anything that may be seen as assisting a political party, politician or candidate

## **Gifts, Benefits and Entertainment**

Employees, their associates and family members are not permitted to receive, either directly or indirectly, or offer or provide a gift, benefit (which includes entertainment) or gratuity beyond that which is considered as normal and legitimate business practice. Employees must report to your immediate manager the offer of any gift that could be construed by others as improper. It is important to assess the gift's value with regard to local customs and traditions.

Employees may accept invitations to business meals and entertainment that are necessary or relevant to NJV's business matters. Invitations to meals and entertainment

intended to influence ethical conduct must be declined.

Under no circumstances should a payment, gift or any other benefit be made or offered with a view to assisting NJV to obtain or retain business, or to effect the enactment or enforcement of any laws. Participation, directly or indirectly, in the offer, authorisation, giving or receipt of any bribe, kickback, contribution or similar payment or benefit is strictly prohibited.

## **Misconduct**

Under no circumstances should a payment, gift or any other benefit be made or offered to a public official with a view to assisting the NJV to obtain or retain business, or to effect the enactment or enforcement of any laws. Participation, whether directly or indirectly, in the authorising, offering or giving of any bribe, kickback, contribution or similar payment or benefit is strictly prohibited.

Facilitation payments are generally regarded as a payment which is made to secure an action or service to which an individual or company is routinely and legally entitled. NJV prohibits all facilitation payments.

## **Breach of Code of Conduct**

Employees should report to their manager any breach of this Code of Conduct or any matter of serious concern. Any breach involving collusion, dishonesty or misuse of NJV funds, assets or information (including the suppression of information) must be reported immediately. Employees need not confront the individual concerned. If they feel unable to discuss a breach with their immediate manager, or are unhappy with their manager's response, they should raise their concern with the Country Manager.

A breach of this Code of Conduct will be viewed as serious misconduct that could result in disciplinary action. This action may include dismissal, removal from site or contract termination.

## **Assistance**

This Code of Conduct is not intended to deal specifically with all situations Employees may encounter. Any doubts or queries should be raised with their manager or the Project Director at any time with the knowledge that their approach will be treated as confidential.

Compliance with the provisions of the Code is mandatory. NJV undertakes to make the Code of Conduct known and accessible to all managers, employees, suppliers, contractors and consultants. Suppliers and contractors who act in contravention of this Code risk being prohibited from doing further business with NJV.



