

WORK ETHICS

HONESTY
&
INTERGRITY



LTA

Steering Fiji Safely

Bula LTA Colleagues



As we begin a new Financial year, LTA Senior Management would like to thank you all for your contribution towards the success of the Authority (LTA) in FY22.

As you are all aware and had also participated in the **ANTI-BRIBERY & CORRUPTION** Campaign hosted by the FICAC, we need to continue to conduct all our business in an **honest** and **ethical** manner.

To-date we have had close to **70 alleged corruption cases** filed against staff. The Authority had had to terminate a number of staff due to Corrupt Practices after following due process.

LTA takes a zero-tolerance approach to bribery, extortion, and corruption.

As per the Collective Agreement section 7.2.4 & HR Policy section 8.2.2 states under the Code of Conduct that “***The Authority requires all its Employees to behave Ethically at all times. Ethical conduct is the fundamental principal that should underpin every decision and action an individual takes in doing his or her job. Ethical conduct should provide guidance in cases where no specific rule is in place or where matters are genuinely unclear; it helps to determine what is right and proper in ones actions***”

Breach of the above Policy has serious consequences.

We all should be committed to acting professionally, fairly and with honesty and integrity in all our business dealings and relationships. Each employee must keep in mind that you all have families that rely on you for support, reputation that you need to uphold and people that look up to you for guidance and an example of a good citizen.

We are all expected to avoid acts which may reflect adversely upon the integrity and reputation of the Authority.

LTA employees must:

1. Never engage in any form of bribery, either directly or through any third party.
2. Never attempt to induce an individual official to act illegally or improperly.
3. Never accept or ask for, money or anything of value, such as gifts, kickbacks or commissions, in connection with the procurement of business or the award of a contract.
4. Never accept any gift from any business partner or any person in the course of your employment or in relation to your employment with LTA.
5. Never facilitate payments to obtain a level of service which one would not normally be entitled to.
6. Never disregard or fail to report any indication of improper payments to the appropriate authorities.
7. Never induce or assist another individual to break any applicable law or regulation.

If you reasonably believe there is evidence of corruption, bribery, a violation of any law, rule, regulation, gross mismanagement, gross waste of funds, an abuse of authority, or a substantial and specific danger to public health or safety then you are encouraged to bring this to the attention of LTA in accordance with the LTA Whistle Blowing Policy. As a whistleblower you will be protected from retaliation for disclosing such information.

Thank you
CEO

Ethics: The LTA Way



KEY PRINCIPLES

- 1 | Be honest, fair and trustworthy in all of your LTA activities and relationships.
- 2 | Obey applicable laws and regulations governing our business worldwide.
- 3 | Fulfill your obligation to be the Voice of Integrity and promptly report any concerns you have about compliance with law, LTA policy or this Code.



KEY QUESTIONS

The Pack is not a substitute for your good judgement, and it cannot cover every conceivable situation. You should be alert to signs that you or your colleagues judgment, are in an integrity gray area and ask yourself three simple questions if you have any doubts about what you should do:

- 1 | How would this decision look to others within LTA and externally?
- 2 | Am I willing to be held accountable for this decision?
- 3 | Is this consistent with LTA's Code of Conduct?

What Employees Must Do

BE KNOWLEDGEABLE

- Gain an understanding of the LTA Code of Conduct Policies
- Learn the details of any LTA policy that is relevant to your individual job responsibilities
- Learn about your detailed business and regional policies and procedures and understand how to apply them to your job.

BE AWARE

- Stay attuned to developments in your area or industry that might impact LTA's compliance with laws and regulations or reputation in the marketplace.
- Understand LTA may review, audit, monitor, intercept, access and disclose information processed or stored on LTA equipment and technology, or on personal-owned devices permitted LTA network access.

BE COMMITTED

- Promptly raise any concerns about potential violations of law or LTA policy.
- Cooperate fully and honestly in LTA investigations related to integrity concerns.

THE COST OF NONCOMPLIANCE

- Employees and leaders who do not fulfill their integrity responsibilities face disciplinary action up to and including the termination of their employment. The following examples of conduct can result in disciplinary action.

Remember: Act if you see an issue. Ask if you are unsure.

Ethics: The LTA Way

EXAMPLES OF MISCONDUCT

- **Violating law or LTA policy** or requesting that others do the same.
- **Retaliating against another employee** for reporting an integrity concern.
- **Failing to promptly report** a known or suspected violation of LTA's compliance policies.
- **Failing to fully and honestly cooperate** in LTA investigations of possible policy violations.
- **Failing as a leader** to diligently ensure compliance with LTA's

What Leaders Must Do

LTA holds its leaders accountable for fostering a culture of compliance. Leaders' responsibilities span prevention, detection and response to compliance issues.

PREVENT

- Incentivize compliance and personally set the example for integrity — not just through words, but more importantly, through actions.
- Never compromise integrity to meet a deadline, satisfy a customer or increase revenue.
- Promote Open Reporting and ensure employees know how to raise concerns and feel safe doing so.
- Ensure your team can recognize "red flags" for key risks and completes assigned compliance training in a timely manner.
- Help employees understand how and where to seek additional guidance and ask questions.
- Understand and follow the policies, laws and regulations that apply to your team. If unsure, ask an expert in Legal or Compliance.

DETECT

- Conduct periodic compliance reviews with the assistance of business compliance leaders and/or Internal Audit.
- Implement control measures to detect compliance risks and violations.

RESPOND

- Document and escalate any employee's expressed concern through the appropriate channels.
- Take prompt corrective actions to address identified compliance weaknesses
- Take appropriate disciplinary action.
- Integrate employees' integrity contributions into evaluations and recognition and reward programs.