



# **WORKSHOP ON PRACTICAL TOOLS FOR STRENGTHEN BUSINESS INTEGRITY IN THE PRIVATE SECTOR OUTCOME REPORT**

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## **OUTCOMES REPORT**

**Thursday, 20 August 2026  
The Hilton Hotel - Port Moresby, NCD**

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## **Workshop on Practical Tools for Stretching Business Integrity in the Private sector**

**Date: 20<sup>th</sup> August 2026**

**Location: Hilton Hotel, Port Moresby**

### **Background**

Under the EU-funded Preventing and Countering Corruption in Papua New Guinea (PNG Anti-Corruption Project), UNDP is working closely with the Government of Papua New Guinea, national institutions, civil society organisations, and communities to strengthen their capacity to prevent and address corruption. The initiative focuses on strengthening PNG's national integrity system by enhancing key anti-corruption institutions and processes and promoting a collaborative approach between government and non-government stakeholders.

A key component of the project is strengthening business integrity within Papua New Guinea's private sector. UNDP, in partnership with business associations and other key stakeholders, aims to promote ethical business conduct, strengthen compliance, and support private sector efforts to prevent and counter corruption.

Corruption remains a significant challenge in Papua New Guinea, undermining economic growth, public trust, investment, and sustainable development. The private sector has an important role to play in promoting integrity and ethical business practices. Strengthening business integrity and compliance frameworks is therefore essential to reducing corruption risks, particularly in areas such as public procurement, financial reporting, corporate governance, and business transactions.

In this context, a dedicated workshop will be organised as part of the EU-funded PNG Anti-Corruption Project to present and discuss the potential endorsement and implementation of the following key documents, developed through the Project in close collaboration with the Business Council of Papua New Guinea:

1. **Draft Research Paper:** *Key Strengths and Gaps in Integrity and Anti-Corruption Legislation and Policies Related to the Private Sector and Proposals for Action in Papua New Guinea.*
2. **Draft Model Code of Corporate Integrity.**
3. **Draft Whistleblower Protection Guidelines.**

The workshop is a continuation of the workshop held in October 2025 and will be organised by UNDP through the EU-funded PNG Anti-Corruption Project, in partnership with the Business Council of Papua New Guinea. The workshop will be followed by a series of focused sessions to enable participants to discuss the practical implementation of the proposed integrity tools in greater detail.

The EU-funded PNG Anti-Corruption Project is being implemented by **UNDP PNG and UNODC**. UNDP PNG is supporting the Government of Papua New Guinea in progressively implementing and monitoring the **National Anti-Corruption Plan of Action (NACPA)**, including key anti-corruption reforms under Outcome 1. UNDP is also supporting the anti-corruption efforts of non-state actors, including civil society organisations, youth, media, and the private sector, particularly through strengthening business integrity and anti-corruption measures under **Outcome 4, Output 4.2**.

## Participation

The workshop has brought together private sector representatives, business associations, and relevant stakeholders in facilitating dialogue and strengthening collective action on business integrity and anti-corruption practices in Papua New Guinea.

## Key Objectives

The workshop aims to:

- Strengthen awareness of private sector actors on business integrity principles, aligned with international standards and national legislations.
- Introduce participants to key anti-corruption tools and discuss their potential endorsement and implementation.

## Expected Outcome

By the end of the workshop, participants will:

- Have an increased understanding of business integrity principles and their importance to organisational governance and sustainability.
- Gain greater awareness of practical tools that can support ethical business practices and strengthen internal anti-corruption measures.
- Provide feedback on the proposed Model Code of Corporate Integrity, Whistleblower Protection Guidelines, and related research findings.
- Identify practical opportunities for integrating integrity and anti-corruption measures into organisational policies, procedures, and workplace culture.
- Contribute to discussions on the potential endorsement and implementation of the proposed integrity tools within Papua New Guinea's private sector.

## Budget overview

The United Nations Development Programme (UNDP), through the EU-funded PNG Anti-Corruption Project, have covered the costs associated with the conference venue, meals & logistical arrangements.

## SESSION 1- WORKSHOP ON BUSINESS INTEGRITY, ANTI-CORRUPTION AND COMPLIANCE IN PAPUA NEW GUINEA

*Presenter: Dr. Alma Sedlar, UNDP Chief Technical Advisor (Anti-Corruption)*

### Overview

The first presentation of the Anti-Corruption Workshop focused on the Draft Research Paper: *Key Strengths and Gaps in Integrity and Anti-Corruption Legislation and Policies Related to the Private Sector and Proposals for Action in Papua New Guinea*. The presentation was delivered by Dr. Alma Sedlar, UNDP Chief Technical Advisor (Anti-Corruption).

The session examined the key strengths and potential gaps in Papua New Guinea's integrity and anti-corruption legislation and policies, particularly in relation to the private sector and its contribution to economic development. The discussion highlighted the role of the private sector in promoting employment, economic diversification, and investment across key industries, including mining, petroleum, and agriculture, as well as the potential for economic zones to attract businesses and investors.

Dr. Sedlar emphasised that increased economic activity and investment can also create heightened corruption risks, including money laundering and other forms of financial crime. Infrastructure, security, and regulatory constraints continue to present challenges to private sector development and business confidence. However, private sector development remains a national priority under the PNG National Strategic Plan 2010–2030.

### Organic Law on the Independent Commission against Corruption (OLICAC)

Dr. Sedlar highlighted the Organic Law on the Independent Commission Against Corruption (OLICAC) as an important framework for addressing corruption in Papua New Guinea. The legislation provides mechanisms to address acts such as abuse of office, bribery, obstruction of justice, and other unethical conduct involving public officials.

The discussion emphasised the importance of ensuring that such legal frameworks do not unnecessarily restrict the Independent Commission Against Corruption (ICAC) from investigating individuals or entities suspected of involvement in corrupt activities.

Dr. Sedlar noted that corruption is a global challenge and that the key difference between countries lies in the speed and effectiveness of their responses. In the PNG context, the presentation touched on issues including the wantok system, human rights violations, gender-based violence (GBV), and gender inequality in the workplace. These issues can affect the effectiveness of anti-corruption legislation, internal codes of conduct, oversight mechanisms, and institutional capacity.

The key legislation discussed included:

- Criminal Code Act
- Whistle Blower Act 2020
- Public Procurement Act
- Anti-Money Laundering Act
- Counter-Terrorist Financing Act (AMLCTFA)

### Corruption and Conflict of Interest

Dr. Sedlar explained that the Organic Law on the Duties and Responsibilities of Leadership (OLDRL) 1975 provides the legal framework for regulating conflicts of interest among leaders and senior public officials.

The framework seeks to prevent the misuse of public office and requires relevant information to be disclosed by senior public servants and Members of Parliament. The Ombudsman Commission plays an important role in monitoring compliance with conflict-of-interest requirements and the Leadership Code.

### Leadership Code

Dr. Sedlar emphasised the importance of the Leadership Code in maintaining professional standards, transparency, and integrity among senior public officials. The Code requires leaders to uphold appropriate standards of conduct in both their professional responsibilities and personal dealings.

### Key Gaps Identified:

The presentation identified several areas requiring further attention and strengthening:

- Organic Law on the Independent Commission Against Corruption (OLICAC)
- Criminalisation of bribery
- Whistleblower protection
- Conflict-of-interest regulation
- Anti-Money Laundering (AML) measures
- Public procurement
- Companies Act
- Right to Information

### Recommendations:

The presentation proposed several recommendations, including:

- **Expand ICAC jurisdiction:** Consider legislative amendments to the OLICAC to enable ICAC to address certain high-risk offences involving the private sector.
- **Strengthen the criminalisation of bribery:** Review and strengthen existing provisions relating to bribery and corruption offences.
- **Strengthen the Criminal Code Act:** Consider amendments to ensure corruption-related offences are adequately addressed.

- **Strengthen whistleblower protection:** Introduce a presumption of protection under the Whistleblower Act where disclosures are made in the public interest, placing greater emphasis on protecting the whistleblower.
- **Broaden the definition of a whistleblower:** Expand the definition to cover a wider range of individuals and circumstances involving protected disclosures.

### Q&A Highlights:

**Q1. Dr. Thiru from IBSU asked about the specific role of whistleblowers in the private sector.**

**Response:**

Dr. Alma Sedlar explained that whistleblower protections are not limited to corruption-related disclosures. They can also apply to other forms of protected disclosure, allowing individuals to report wrongdoing or concerns that may be in the public interest.

**Q2. Mrs. Carmella, Executive Director of BCPNG, asked which legislation currently governs business integrity within the private sector.**

**Response:**

Dr. Sedlar explained that there is currently no single piece of legislation that specifically obliges private sector organisations to adopt a particular code of ethics or conduct. She noted that it may not be appropriate for government to impose a uniform code of ethics on private businesses, particularly given the different operating environments of private sector organisations.

**Q3. Mrs. Carmella, Executive Director of BCPNG, asked how private sector integrity, values, and ethical conduct can align with those of government when businesses and government operate in different environments, particularly when engaging in government procurement and contracts.**

**Response:**

Dr. Sedlar emphasised that both government and the private sector must uphold **transparency and accountability**. She highlighted the importance of ensuring that tenders and procurement processes are transparent and publicly accessible, while maintaining accountability throughout the process. This provides a basis for building a common understanding of integrity and ethical conduct between government and business.

## SESSION 2: MODEL CODE OF BUSINESS INTEGRITY

**Presenter: Dr. Alma Sedlar, UNDP Chief Technical Advisor (Anti-Corruption)**

### Overview

The second session focused on the Draft Model Code of Business Integrity, which aims to establish a unified framework for ethical and responsible business conduct in Papua New Guinea. The Code seeks to promote a culture of integrity across the private sector while aligning business practices with national laws, regulatory standards, and community values.

The proposed Code would apply to:

- Domestic and international businesses affiliated with chambers of commerce and business associations.
- Suppliers, partners, and contractors that maintain business relationships with participating organisations.

### Meaning of Business Integrity

Business integrity refers to the consistent application of values and principles of transparency, fairness, accountability, and ethical responsibility across all business activities.

Organisations that uphold business integrity demonstrate:

- Transparency, fairness, and respect.
- Consistency between words and actions.
- A culture of openness and accountability.
- Respect for laws and regulations.

### Commitment Statement

Dr. Sedlar emphasised that businesses endorsing the Code would affirm their commitment to:

***“Upholding the highest standards of ethical conduct, reject corruption, and contribute meaningfully to the sustainable development of PNG.”***

She noted that the commitment is intended to move beyond aspirational language and encourage businesses to demonstrate these principles through their policies, systems, and day-to-day operations.

### Core Values

The Model Code identifies the following core values:

- Openness and integrity.
- Responsibility and respect for the law and communities.
- Fairness and equality.
- Environmental stewardship.

### Standards of Ethical Conduct

The proposed Code establishes standards covering seven key areas:

1. Anti-Corruption and Ethical Conduct
2. Conflict of Interest
3. Whistleblower Protection and Reporting
4. Fair Competition and Market Integrity
5. Data, Financial and Information Integrity
6. Labour Rights and Human Dignity

## 7. Community Engagement and Environmental Responsibility

### Implementation Framework and Oversight

The proposed implementation framework includes the following measures:

#### Formal Endorsement and Renewal

- Businesses would formally endorse the Code upon joining a chamber of commerce or business association, affirming their commitment to its principles. Members would also be required to undertake an annual renewal or declaration confirming their commitment to responsible business conduct.
- BCPNG or the relevant business association would have a role in supporting adherence to the Code by providing guidance, mentorship, and relevant resources to members.

#### Multi-Stakeholder Dialogue and Collective Action

- Businesses would be encouraged to participate in multi-stakeholder dialogue and collective action with government, civil society, and other private sector organisations to strengthen anti-corruption safeguards and promote responsible business practices.

#### Supporting National Development Priorities

- The Code encourages businesses to contribute to national development priorities through inclusive business practices, local capacity building, gender equality, and environmental sustainability, in alignment with PNG Vision 2050.

#### Annual Reporting

- Members would be encouraged to report annually on their progress, challenges, and experiences in implementing business integrity measures.

#### Training and Awareness

Dr. Sedlar highlighted the importance of ongoing training and awareness to ensure that the Code is understood and effectively implemented.

Proposed approaches include:

- Chamber or business association-led initiatives.
- Periodic workshops, seminars, and webinars.
- Company-led business integrity initiatives.
- Business integrity induction training and annual refresher sessions.
- Development of accessible e-learning courses and resources.

### **Ethics Advisory and Investigation**

The session also proposed establishing dedicated ethics and compliance capacity within chambers or business associations. This could include:

- Dedicated ethics and compliance units.
- Specialised personnel to provide advice and support.
- Mechanisms to receive and assess integrity-related concerns and reports.

### **Monitoring and Reporting**

Dr. Sedlar acknowledged that reporting integrity breaches can be sensitive for members of chambers and business associations. However, voluntary reporting of significant breaches of integrity or unethical conduct would be encouraged through a confidential reporting mechanism.

She emphasised the importance of transparency, confidentiality, and collective learning in strengthening integrity across both the private and public sectors.

### **Sanctions for Non-Compliance**

The proposed Code provides for proportionate and graduated sanctions, depending on the seriousness of the violation. Possible measures include:

- Formal written warnings or official reprimands.
- Mandatory remedial or ethics training.
- Suspension of membership.
- Suspension of access to association privileges.

### **Q&A Highlights:**

**Q1. Mr. Eric Krama from PNG Europe B.C. asked whether there was a mechanism to hold government agencies accountable for delays in the delivery of services.**

#### **Response:**

Dr. Sedlar suggested the consideration of a 15-day response period for public organisations. Where an organisation fails to respond within the prescribed period without adequate justification, it could potentially be subject to accountability measures or disciplinary action.

**Q2. Dr. Thirumal from IBSU requested clarification on whistleblower protection, particularly regarding the potential impact on a company's reputation when protection is provided to a whistleblower.**

#### **Response:**

Dr. Sedlar explained that there are three potential reporting channels available to whistleblowers:

1. Internal reporting – reporting the concern through the company's internal mechanisms.
2. External reporting – seeking assistance from an external organisation or appropriate authority to investigate the concern.
3. Media reporting – bringing the matter to the attention of the media.

She explained that the first two mechanisms can allow concerns to be investigated without unnecessarily damaging the company's reputation or exposing the whistleblower. Public disclosure through the media, however, can carry greater risks for both the organisation and the whistleblower and should therefore be approached carefully.

### SESSION 3: ANTI-CORRUPTION, WHISTLEBLOWER PROTECTION & BUSINESS INTEGRITY

*Presenter: Dr. Alma Sedlar, Chief Technical Advisor (Anti-Corruption), United Nations Development Programme (UNDP)*

#### Overview

The third session focused on strengthening private sector participation in anti-corruption efforts and establishing effective whistleblower protection mechanisms in Papua New Guinea. Dr. Alma Sedlar explained that a whistleblower is an individual who reports wrongdoing, misconduct, or corruption within an organisation. The purpose of whistleblower protection is to encourage reporting while protecting individuals from retaliation or other adverse consequences.

Dr. Sedlar noted that although whistleblower protection systems can appear complex, they become more manageable when organisations establish clear procedures, reporting channels, timelines, and protection measures. She highlighted that many companies, government departments, and countries have successfully implemented such systems and emphasised that whistleblower protection should be viewed primarily as a **preventative measure** rather than simply a mechanism for responding to misconduct.

#### Whistleblower Safety and Protection

Dr. Thirumal raised concerns about the safety of whistleblowers, noting that there is currently no sufficient guarantee of protection in all circumstances. He highlighted the risks individuals may face when disclosures become public, particularly through social media, where whistleblowers may be subjected to personal attacks or retaliation.

He noted that creating effective legislative protections and penalties remains challenging and emphasised that protecting whistleblowers is a collective responsibility involving government, businesses, civil society, and other stakeholders.

Mrs. Carmella Gabina proposed that the private sector may have greater confidence in reporting if an independent organisation, such as **Transparency International PNG (TIPNG)**, could serve as an independent "gatekeeper" for whistleblower reports. She noted TIPNG's historical connection with BCPNG and suggested that it could be a potential partner in establishing an independent reporting mechanism.

### Prevention as a Priority

Dr. Sedlar emphasised that **prevention should be prioritised over investigation**. She encouraged organisations to focus on education, training, awareness, and the development of effective ethical systems to reduce corruption risks before they result in serious breaches.

She identified a modern **Code of Conduct and ethics programme**, supported by visible and credible protection mechanisms, as important preventative measures. Investigations should be undertaken where breaches occur, but prevention should remain the primary focus. She also noted that prevention is consistent with ICAC's broader mandate.

### Development of a Common Code of Conduct

Mrs. Gabina highlighted the inconsistency of Codes of Conduct among BCPNG members. She proposed that BCPNG, in collaboration with UNDP and Mary, develop a **generic Code of Conduct template** that could be adapted and adopted by member organisations.

The discussion referenced relevant provisions under the Companies Act and the Investment Promotion Authority (IPA), as well as the separate code applicable to companies listed on the PNG Stock Exchange. Mrs. Gabina suggested that BCPNG engage with IPA to explore the development and promotion of a common business integrity standard, identifying this as an existing gap in PNG's private sector integrity framework.

### Values, Ethics and Organisational Culture

Dr. Sedlar acknowledged the importance of ethical values and religion in shaping individual and organisational behaviour. However, she cautioned that values alone are not sufficient to prevent corruption. She emphasised the need for structural measures, clear procedures, accountability mechanisms, and organisational systems, noting that existing approaches have not been sufficient to address corruption effectively.

Dr. Thirumal also highlighted the importance of values and referred to PNG's predominantly Christian context. He clarified that the discussion was not intended to promote religion but rather to recognise the role that shared values can play in strengthening integrity.

He emphasised the importance of addressing the root causes rather than the symptoms of corruption and suggested that NGOs can play an important role in supporting businesses to strengthen integrity by working closely with organisations and promoting values-based approaches.

### Government Processes and Corruption Risks

Mrs. Gabina identified delays in government processes as a significant factor that can create opportunities for corruption. She cited instances where permits can take several months to process and noted that prolonged delays may create pressure on businesses and increase corruption risks.

To address this issue, she proposed that BCPNG develop a practical Government Engagement Toolkit for members. The toolkit would provide clear procedures and escalation pathways for businesses experiencing delays when dealing with government departments, including appropriate steps to follow before escalating matters to Secretary-level officials.

## UNDP Support and Next Steps

Dr. Sedlar confirmed that UNDP remains available to support BCPNG, chambers of commerce, and private sector members until December 2026. She noted that decisions regarding the next steps and priorities would ultimately rest with BCPNG and its members.

Participants were also requested to complete the workshop evaluation forms and post-tests. Dr. Sedlar explained that these were important for UNDP's internal accountability, donor reporting requirements, and measuring participants' learning outcomes.

Overall, the session reinforced the importance of prevention, clear procedures, effective whistleblower protection, consistent Codes of Conduct, and practical tools to strengthen business integrity within Papua New Guinea's private sector. It also highlighted the opportunity for BCPNG and its members to utilise available UNDP technical support before the current project concludes in December 2026.

## Recommendations

- Develop and circulate a model Whistleblower Protection Policy with clear timelines, reporting channels, and confidentiality protections for all members.
- Engage Transparency International PNG to explore a partnership as an independent gatekeeper for private sector whistleblower reports.
- Develop a generic Code of Conduct template in collaboration with UNDP and IPA, aligned with the Companies Act, for adoption by BCPNG members.
- Prioritize prevention through Code of Conduct training, ethics awareness, and leadership messaging across member organizations.
- Develop a Government Engagement Toolkit outlining escalation procedures for members facing delays, to reduce opportunities for corruption.
- Partner with ICAC to deliver preventative education and support consistent with its mandate.
- Establish a Board Integrity Sub-Committee to determine BCPNG's collective advocacy position on anti-corruption and business integrity.
- Utilize UNDP technical assistance, training, and templates before the current project closes in December 2026.

## POST TEST EVALUATION AND CLOSING REMARKS

The workshop concluded with a **Post-Workshop Knowledge Test** consisting of five questions identical to those administered during the Pre-Workshop Knowledge Test. All participants present completed the assessment as required. The purpose of the post-test was to assess participants' knowledge and understanding following the workshop and determine whether the presentations, discussions, and practical sessions had strengthened their understanding of business integrity, anti-corruption, compliance, and whistleblower protection. The results will assist UNDP in evaluating the effectiveness of the workshop, measuring learning outcomes, meeting internal accountability and donor reporting requirements, and identifying areas that may require further training or technical support.

In the closing remarks, participants reflected on the importance of strengthening business integrity and collective action within Papua New Guinea's private sector. The discussions highlighted that addressing corruption requires not only legislation and enforcement, but also prevention, ethical leadership, clear organisational procedures, effective reporting mechanisms, and a strong culture of integrity. Dr. Alma Sedlar reaffirmed UNDP's continued technical support to BCPNG and private sector stakeholders through the current EU-funded PNG Anti-Corruption Project until December 2026, encouraging participants to utilise the available technical assistance, training, and resources. The workshop concluded with appreciation to all participants, speakers, partners, and stakeholders for their active engagement and contributions.