Fairness and Performance of Employees in the Hospitality Industry: A Study of Umah's Hotel & Resort

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Abstract:- The objective of the study is to evaluate the effect of fairness on employee job performance in hospitality industry. The research was carried out using purposive sampling techniques of all the sixty-one (61) employees of Umah's Hotel & Resort, since the respondents span across the managerial, supervisory and junior staff of the company. Findings show that eighty percent (80%) of the respondents indicate that duties in the organization are not assigned based on religion or tribe. On equal reward system, 91% of the respondents are of the opinion that there is equal reward on pay and other incentives in the company. Based on the findings it is recommended that fair practices be adopted for successful increased performance, efficiency and high employee output. Management should improve communication, distribution of objectives and training of members and motivate staff for efficiency.

Keywords:- *Fairness, Fair Practices, Employee Performance, Management.*

I. INTRODUCTION

The industrial revolution of the 18th century created a multicultural workforce, with people of varying cultural, ethnic and racial background. Modern labour force any organization may have, is simply a reflection of numerous parameters that are not homogeneous. This include different job experiences, age, gender, educational qualification, background etc. Hence, there is an increase of what Bhat (2016) calls 'workforce diversity'. Therefore, today's human resource manager has a lot to do in creating an environment devoid of negative diversity. To guard against unfair treatment in the workplace, the United Nations through the Universal Declaration of Human Rights in 1948 adopted sets of principles to discredit tyranny, discrimination and contempt in the workplace. Article 23 states that, (1) Everyone has the right to work, to free choice of employment, to just and favourable conditions of work and to protection against unemployment. (2) Everyone, without any discrimination, has the right to equal pay for equal work. (3) Everyone who works has the right to just and favourable remuneration, ensuring for himself and his family, an existence worthy of human dignity and supplemented, if necessary, by other means of social protection. (4) Everyone has the right to form and join trade unions for the protection of his interests (WHO, 2017). The

task cum objective of this study is to examine the role of management and the fair implementation of this treaty.

The concept 'fairness' is also known as organizational justice. The origin of the clause 'fairness' dated back to 1954 as was used in the treaty, Friendship, Commerce and Navigation (FCN) between United States and Germany (Dolzer, 2005). The term equally refers to the extent to which employees perceive workplace procedures, interactions and outcomes to be fair in nature (Baldwin, 2006). Three types of organizational justice have been highlighted; distributive (outcomes being distributed proportionally to inputs), procedural (decision process leading to a particular outcome) and interactional (treatment received by those working in an organization) (Baldwin, 2006).

Performance (job performance/actual performance) according to Mangkunegara and Anwar (2013) cited in Nazwirman (2019) means the work performance or actual achievement by someone. Employee performance is the peculiar amount of work accomplished by an employee in accordance with the duties assigned to him. In general, high performance is needed in an organization to achieve its goals, deliver the products and services they specialized in, thus numerous factors are required to be in place to achieve it, including fairness.

Umah's Hotel & Resort as a business unit was incorporated with the Corporate Affairs Commission (CAC) in April, 2017. It is located at Igbo-Etche, Rivers State, Nigeria. Its field of business in the tourism industry covers lodging, events centre, gym, club, swimming pool, bush and pool bar, restaurant, general entertainment and ware-house and food delivery services. The hotel has 61 employees in nine (9) business units. The study dealt with two variables which include fairness and employee performance. The data for this research is limited to the employees' perception of fairness and their performance in the organization. This study was conducted with the goal of assessing and aiding the improvement of local work climate and increase work performance among employees.

➤ Statement of the Problem

The problem of this study is that organizations have been losing great/valuable members of staff through resignation, termination and re-employment. There have

also been several complaints and accusations from many employees from their previous organizations on issues of unfair treatment to their persons. This is because every organization is made up of a number of different persons and groups of employees with varying interest. There are numerous limitations relative to the management of companies and organizations, including unfair treatment of workers. This practice is common place in any workforce. In all, employees are the backbone, and the most valuable assets an organization can inherit in achieving higher productivity. Therefore, being fair or unfair is highly dependent on the principles and practices of management in the organization. The questions are; is fairness possible in the face of racism, ethnicity, power, religion and other factors? What method of collaboration between groups of people can best obtain a balance in the system? However, concerning fairness and employee performance, there are no known research-based evidences within organizations in Port Harcourt along this line. Hence, this study is intended to fill this gap and give feedback about the effect of fairness and employee performance in Umah's Hotel & Resort.

➢ *Aim and Objectives*

The main objective of the study is to evaluate the effect of fairness and performance of employees in the hospitality industry: A study of Umah's Hotel & Resort. More specifically, the study seeks to:

- Assess how management roles affect fairness practices in the organization.
- Determine if fairness practices in the organization aid employee's performance.
- Ascertain the relationship between fairness practices and employee performance in the organization.

➢ *Research Questions*

To guide the study, the following research questions were formulated.

- How do management roles affect fairness practices in the organization?
- To what extent do fairness practices in the organization aid employees' performance?
- What is the relationship between fairness practices and employee performance in the organization?

➢ *Hypotheses*

The following hypotheses were tested in this study.

- HO1: Management roles have no significant effect on being fair with the employees in the organization.
- HO2: Fairness practices by the management does not significantly aid employee performance.
- HO3: There is no significant relationship between fair practices and employee performance in the organization.

II. LITERATURE REVIEW

Social Identity Theory (SIT) as proposed by Henri Tajfel and John Turner in 1971 is adopted for the study. This framework is used to review studies on fairness, focusing on the impact of employee performance relating to group behaviour. Social Identity Theory (SIT) is the study of the interplay between personal and social identities. Hence, SIT predict the circumstances of thought under as individuals or as group members. The minimal-group studies of SIT in 1970 showed categorization of individuals into groups to make them think of themselves and others in terms of group membership instead of as separate individuals. Thus, SIT came out of group membership focused to instill meaning in social situations. Group helps people to identify who they are and how to relate with others. SIT was developed to connect cognitive processes and behavioural motivation.

The root of the theory has an impact on its applications in organizations (both public and private), as it relates to the way employees are treated in the workplace. According to Lind and Tyler (1988), organizational fairness affects employees' economic and psychological health by meeting their socio-economic needs in the organization (e.g., the need for control, self-esteem and inclusion). In conjunction with the afore mentioned, Hassan (2013) study provided evidence that fair treatment can improve public employees' trust in their management, increase job satisfaction, enhance motivation, reduce urge to leave firm, and reduce payment of union fees. It implies therefore that; good social integration of workers has the leverage to increase performance of employees in the workplace.

A study by Saari and Judge (2004), claims that well-being and satisfaction among workers are their performances and contributions they create for the company. According to Bowen, Gilliland and Folger (1999), workers esteem, how they are contending with and among their colleagues is important, because employees do not have opportunity to information on technical, financial, legal and strategic decisions designed by management. They further noted that, unfair organizations, do not energized employees about their work and association with the organization. Stressing that, fairness impact on subordinates' job satisfaction and positive implications on organizational productivity.

Abratt and Kleyn (2012), study revealed that being treated fairly have impact on employees as a quality standard has on an organization's reputation. Implying that, if the workforce is treated fairly, they work, and bond themselves with the company and generate positive information about it. Bowen, Gilliland and Folger (1999) further observed that, fair treatment bestows to employee commitment. Treating customers fairly impact on workers' motivation and fulfillment. Jung and Yoon (2013), study shows that 40% to 80% of customer's happiness and devotion depend on their relationship with the employees. In the public service, the study of Van Dijke, De Cremer and Mayer (2010), proved that if public employees perceive

procedural fairness to be high, the more likely they are to infer that they are valued by their organization.

Chi and Gursoy (2009) stress that, when employees are pleased and committed to their work they stay with the firm even under low turnover with better performance, and are ready to pull and develop new employees. They added that, workers' contentment plays a pivotal role in organization, as a way to achieve financial gains and that "taking care of employees can be defined as providing batter pay, ongoing training, and making employees feel secure". Satisfied workers are motivated and tend to work harder in unity beyond expectations, offering better services, contributing to higher customer demands. Fairness and fair treatment, according to Moorman, Niehoff and Organ (1993), mean fidelity to work, averting problems with other employees, communicating decisions, actions and refraining from complaint about the organization. Wilson, Valarie, Mary and Swayne (2008), argue that service culture is granting internal and external customers good service. The study of Daramola and Daramola (2019) demonstrated that merit, raises and bonuses are the main factors of performance-based pay that influenced the effectiveness of performance.

Fujishiro (2005) work on fairness and employee well-being, suggests that unfair practices act as an occupational deformation, detrimental to workers' health and fitness. He suggests that, fair practices impact on employee health over job control, social support, and aspects of work orientation (i.e., workload, pay), and regressive responses (i.e., smoking, alcohol consumption). Kivimäki, Ferrie, Head, Shipley, Vahtera and Marmot (2004), Whitehall 11 study of 7-years of London civil workers, show support for the effect of organizational justice on health and well-being.

Janssen, Katzmarzyk and Ross (2004) examined distributive justice and procedural justice interaction effect, and found that high levels of job demands, with high job-related anxiety and burnout exist only when distributive justice and procedural justice were both perceived as low. With two types of organizational justice, the level of demands was not associated with anxiety or burnout. It implies that fair procedures in the organization may protect health of employees especially those exposed to high job demands and who normally perceived compensation as not fair. Job and compensation may be difficult to change, but fair procedures may be achieved. All these studies reviewed demonstrated that organizational injustice is associated with employee well-being.

The work of Colenso (2000) shows that teamwork can enhance quality productivity, ingenuity and workers' gratification. Robbins and Finley (1996) study on barriers to team development, discovered that team failure is due to unsuitable, perplexed goals, questionable roles, poor decision making, conflicts, poor feedback, low reward systems, no team trust and lack of change. In all, Oakland (1993); Jackson and Madsen (2004), support the fact that, absence of training or ill-equipped team composition produce skill gaps, that decreases team performance. While Ingham, Teare, Scheuing and Armistead (1997) suggest that,

efficient teamwork can be measured by individual worker and workplace performance. Dike, Anetoh, Obiezekwe and Eboh (2021) study recommended fair and reasonable procedures in order to establish a good communication system with workers for better decision-making and organizational relations.

Fairness, sometimes referred to as organizational justice, often is the acceptable methods of actions, including rewards, and associations with officials in the workplace accessed to be fair. Fairness is classified into three for the purpose of measurement, namely; interactional, procedural and distributional justice. Proper management of fairness in an industry will promote increased productivity.

Performance is the work efforts of an employee at an industry to achieve a recognizable productivity. According to Dike et al. (2021) employee performance is the quality and quantity of output done by workers for the fulfilment of firm's objectives. In most organizations, performance is focused on targets as an obligation to grow. Generally, performance indices vary from group to group, but the essence is growth and productivity in the workplace.

The hospitality industry is an arm of the business sector known as the travel and tourism industry. Its aim is the provision of products and services to trippers. To Merriam-Webster (2023) dictionary, hospitality is defined as 'the business of providing services to guests in hotels, restaurants, bars, etc.'. Hospitality is considered the art of offering good gesture and attending to the basic satisfaction of strangers and visitors, as it relates to food, drinks, and lodging. It is simply playing host to a visitor.

Hotels are usually classified upon location, size, clientele, services offered etc. by this, the Umah's hotel and resort by features, facilities and services may be classified as three-star hotel. Located at a standard locality, with adequate parking space for cars. It has over 20 rooms, with attached bath rooms, tubs of hot and cold water. All rooms are air-conditioned with furniture and furnishings in standard rooms design. Provided are round the clock reception, room intercom, dinning/restaurant, bars (bush, pool, club), kitchen maned by experienced chefs on intercontinental and African traditional dishes, clean and hygienic environment. Members of staff are always courteous in clean smart uniform, including valet laundry services. Housekeeping is at its peak, with quality cutlery and glassware, also are a variety of standard linen, duffel, towels etc.

III. METHODOLOGY

The research was carried out using ex-post-facto design and purposive sampling techniques because all members of the population were sampled. The population of the study consists of 61 employees of Umah's Hotel & Resort. The respondents span across the managerial and junior staff of the company. The main instrument used for the study is a questionnaire tagged: "Questionnaire on Fairness and Employee Performance" (QFEP) with three

sub-sections, namely; management roles and fairness practices, how fair practices aid employees' performance, and the relationship between fair practices and employee performance.

Out of 61 copies of questionnaire distributed, 45 (representing 74%) were properly filled and found valid for analysis. Frequency counts and percentages were used to answer the research questions. Associated method was used to test the relationship between the independent variable (fairness) and the dependent variable (employee performance) in the organization. The type of data used is primary data. A response format of 2-points rating scale of Yes or No and Never, Often and Rarely were used.

IV. RESULTS

➤ *Research Question One:*
How do Management roles affect fairness practices in organizations?

Table 1 Management Roles and Fair Practices

	Items				
		Freq.	Yes %	Freq.	No %
1a.	Your boss (manager/supervisor) communicates with you respectfully.	45	100		
1b.	Your boss criticizes you when problems arise at workplace.	29	64.4	16	35.6
1c.	I receive social support from management/co-workers.	27	60.0	18	40.0
1d.	Your organization have sick policy.	20	44.4	25	55.6
1e.	I was trained on the job I am assigned.	44	97.8	1	2.2

A look at the table (1a-e) indicate that, all respondents (100%) agree that their supervisors and managers communicate with them respectfully. More so, 64.4% of respondents accepted that they are criticised when wrong issues/problems arise, but 35.6% disagree to that. On social support from the organization, 60% of respondents agreed, while 40% said no to it. On the other hand, 44.4% of respondents agreed that the organization has a sick care policy, while 55.6% said No to it, indicating that the Hotel does not have a health care policy for members of staff. On the question of job-based knowledge, 97.8% of respondents agreed that they were trained on their jobs, while 2.2% were not trained.

➤ *Research Question Two:*
To what extent do fairness practices in the organization aid employee performance?

Table 2 Fair Practices Aid Employees' Performance

	Items				
		Freq.	Yes %	Freq.	No %
2a.	Job are assigned to all workers.	45	100.0		
2b.	I am promoted as at when due	17	37.8	28	62.2
2c.	Duties are assigned based on religion or tribe	9	20.0	36	80.0
2d.	We are equally rewarded with pay/other incentives.	41	91.1	4	8.9
2e.	We observe teamwork.	29	64.4	16	35.6
2f.	I was cared for when bereaved, need pay advance etc.	23	51.1	22	48.9
2g.	I observe bias towards discipline in the system.	15	33.3	30	66.7
2h.	I am satisfied the way issues are resolved	36	80.0	9	20.0
2i.	I have been threatened with suspension or dismissal.	15	33.3	30	66.7

Table 2 analysis (a-i) deals with assigned duties in which all (100%) the respondents know their jobs. On promotion, 62.2% indicated that they were not promoted as at when due. While 37.8% agree to it. Also, 80% of respondents indicate that duties in the organization are not assigned based on religion or tribe. While 20% of the respondents noticed an influence of preference of religion or tribe. On equal reward system, 91.1% of the respondents are of the opinion that there is equal reward on pay and other incentives in the company. On team work, 64.4% of respondents accepted team work approach to duties in their work place. While 35.6% are negative in response to teamwork. More so, 51.1% support the management that they were cared for when the need arises in their personal life. While 48.9% were not supported at the same instance. On discipline, 66.7% do not observe bias situations towards discipline in the management of the organization. While 33.3% noticed some acts of indiscipline. This indicate that discipline is higher in the system. On the resolution of issues in the organization, 80% of respondents agree to the system of resolving matters. 66.7% of respondents have never been threatened with suspension nor dismissal in their work place.

➤ *Research Question Three:*
What is the relationship between fairness practices and employee performance in the organization?

Table 3 Relationship Between Fairness Practices and Employee Performance

	Items	Freq.	Never %	Freq.	Rare %	Freq.	Often %
3a.i	I often think of quitting my job?	13	28.9	30	66.7	2	4.4
		Freq.	Yes.%			Freq.	No.%
3b.ii	I derive satisfaction working in the organisation.	42	93.3			3	6.7
3c.ii	There has been improvements in the organization since I joined.	20	44.4			25	55.6
3d.ii	I always meet job targets assigned to me.	19	42.2			1	2.2
3e.ii	I was fairly rated on the last performance appraisal system.	15	33.3			5	11.1
3f.ii	Workers engage in open dialogue/communication on issues.	14	31.1			6	13.3

Results of table 3 (a-f) indicates that 66.7% of respondents rarely think of quitting their jobs, while 28.9% do not entertain such thoughts. However, 93.3% of the respondents are satisfied working in the organization. On improvements in the organization, 55.6% of respondents agreed they did not see any major improvement in the organization since they joined. However, 44.4% admitted that they have seen some form of improvements. On the other hand, 42.2% of respondents have always met their job targets as assigned to them. Meaning that they comply with company rules, policies and objectives. On employee performance appraisal, 33.3% rated the system as being fair. On the issue of open dialogue and communication, 31.1% of the respondents are of the opinion that, open dialogue is what they apply in the company.

➢ *Hypotheses*

• *HO1: Management Roles have no Significant effect on being Fair with the Employees in the Organization.*

Respondents agree 100% that supervisors and managers are respectful. A 64.4% of respondents accepted being cautioned when wrong issues/problems arise, 35.6% disagree. On social support, 60% agreed, 40% disagreed. On sick care policy, 44.4% agreed, while 55.6% disagreed. About 97.8% of members of staff were trained on job-based knowledge, while 2.2% were not trained. This demonstrates that HO is rejected, implying that management have great significant effect on fairness in the organization.

• *HO2: Fairness Practices by the Management does not Significantly aid Employee Performance.*

All respondents know their jobs, and 62.2% were not promoted as at when due, but 37.8% agree to it. Also, 80% of duties in the organization are not assigned based on religion or tribe. On equal reward system, 91.1% are of the opinion that there is equal reward on pay and other incentives. While 64.4% accepted team work approach to duties, 35.6% are negative in response. More so, 51.1% agreed management cares, but 48.9% varied. A total of 66.7% of respondents noticed general discipline, while 33.3% observed indiscipline. On conflict resolution 80% agree to the approach. In all, 66.7% of respondents were never threatened with suspension nor dismissal. Here, the hypothesis is accepted, that fairness practices have a

significant effect on employee performance because of general acceptability.

• *HO3: There is no Significant Relationships between Fairness and Employee Performance in the Organization.*

The 66.7% of respondents rarely think of quitting their jobs, 28.9% too, do not entertain such thoughts. However, 93.3% are satisfied working in the organization. There are major improvements as adored by 55.6% of respondents in the organization. On effectiveness, 42.2% of respondents have always met their job targets. On appraisal, 33.3% rated the system as fair. On communication, 31.1% of the respondents apply open dialogue. In relationships, all answers were in the positive, hence acceptance of hypothesis. This implies that, there is a positive relationship between fairness and employee performance.

V. DISCUSSION

Management, fairness practices have great significant effect on performance of employees in the organization (Umah's Hotel & Resort). This is in line with Dike et al. (2021) study that management should follow fair and reasonable procedures in order to establish a good communication system with workers in the decision-making process as well as organizational relations. Fair practices have significant effect on employee performance. This is in tandem with Daramola and Daramola (2019) research that, merit, raises and bonuses were the main factors of performance-based pay that influenced the effectiveness of performance. There is a positive relationship between fairness practices and employee performance in organizations. According to Van Dijke et al. (2010), the more public employees perceive procedural fairness to be high, the more likely they are to infer that they are valued by their organization. Fair practices could now be adopted as a major prerequisite for an organizational system, and for successful increased performance.

VI. CONCLUSION/RECOMMENDATIONS

Since fair practices result in efficiency and high employee performance, it is recommended that it be adopted as a policy by organizations. Work must be interesting with elements of motivation on the part of management.

Management has clear tasks of communication, distribution of objectives and training of members of staff for efficiency. High performance spirit must be developed and practiced as a culture among members of staff.

REFERENCES

[1]. Abratt, R., & Kleyn, N. (2012). Corporate identity, corporate branding and corporate reputations: Reconciliation and integration. European Journal and Marketing, 46(7-8), 1048-1063. https://doi.org/10.1108/03090561211230197

[2]. Baldwin, S. (2006). Organizational justice. Institute for Employment Studies. University of Sussex Campus, Falmer. 1-13.

[3]. Bowen, D.E., Gilliland, S.W., & Folger R. (1999). How being fair with employees spills over to Customers. Organizational Dynamics.27(3), 7-23. https://doi.org/10.1016/S0090-2616(99)90018-9

[4]. Chi, C. G., & Gursoy, D. (2009). Employee satisfaction, customer satisfaction and financial performance: An empirical examination. International Journal of Hospitality Management, 28(2), 245-253, doi: 10.1016/j.ijhm.2008.08.003

[5]. Colenso, M. (2000). How to accelerate team development and enhance team productivity. London: Prentice-Hall.

[6]. Daramola, L., & Daramola, A. A. (2019). Factors influencing employee performance in an organization. International Journal of Emerging Engineering and Technology.7, (12). 37-44.

[7]. Dike, G. N., Anetoh, J, C., Obiezekwe, C. J., & Eboh, S. O. (2021). Organizational justice and employee performance of government owned Polytechnics in Anambra State of Nigeria. Journal of Business and African Economy. 7. (1), 1-41.

[8]. Dolzer, R. (2005). Fair and equitable treatment: A key standard in investment treaties. The International Lawyer. 39, (1), 87-106.

[9]. Fujishiro, K. (2005). Fairness at work: Its impacts on employee well-being. A published Ph.D. Dissertation, Ohio State University.

[10]. Hassan, S. (2013). Does fair treatment in the workplace matter? An assessment of fairness and employee outcomes in government. The American Review of Public Administration, 43 (5), 539-557, https://doi.org/10.1177/0275074012447979.

[11]. Ingham, H., Teare, R., Scheuing, E., & Armistead, C. (1997). A system model of teamwork. The TQM Magazine, 9, (2), 118-127.

[12]. Jackson, B., & Madsen, S. R. (2004). Common factors of high performance teams. Utah Valley State College.1303-1310.

[13]. Janssen, I., Katzmarzyk, P. T., & Ross, R. (2004). Waist circumference and not body mass index explains obesity related health risk. The American Journal of Clinical Nutrition,79, (3), 379-384, https://doi.org/10.1093/ajcn/79.3.379.

[14]. Janssen, O. (2004). How fairness perceptions make innovative behavior more or less stressful. Journal of Organizational Behavior, 25(2), 201-215, https://doi.org/10.1002/job.238.

[15]. Jung, S.H., & Yoon, H.H. (2013). Do employees´ satisfied customers respond with an satisfactory relationship. The effects of employees´ satisfaction on customers´ satisfaction and loyalty in a family restaurant", International Journal of Hospitality Management.34, 1-8, https://doi.org/10.1016/j.hm.2013.02.003.

[16]. Kivimäki, M., Ferrie, J. E., Head, J., Shipley, M. J., Vahtera, J., & Marmot, M. G. (2004).

[17]. Organizational justice and change in justice as predictors of employee health: The Whitehall II study. Journal of Epidemiology and Community Health, 58, (11), 931-937, doi:10.1136/jech.2003.019026.

[18]. Lind, E. A., & Tyler, T. R. (1988). The social psychology of procedural justice. Springer Science and Business Media, doi: 10.1007/978-1-4899-2115-4_1

[19]. Merriam-Webster Dictionary (2023) www.merriam-webster.org. retrieved 02/06/2023.

[20]. Moorman R. H., Niehoff B. P., & Organ, D. W. (1993). Treating employees fairly and organizational citizenship behaviour: Sorting the effects of job satisfaction, organizational commitment, and procedural justice. Employee Responsibilities and Rights Journal, 6(3), 209-225, http://dx.doi.org/10.1007/BF01419445.

[21]. Nazwirman, N. (2019). Analysis of employee performance: A case study in Port Corporation. Journal Organisasi dan Manajemen. 15(1), 24-35, doi: 10.33830/jom.v15i1.7.2019.

[22]. Oakland, J. (1993). Total quality management. The route to improving performance, (2nd ed.). Oxford: Butterworth-Heinemann.

[23]. Robbins, H., & Finley, M. (1996). Why teams don't work, what went wrong and how to make it right. Orion Publishing Group.

[24]. Saari, L. M., & Judge, T. A. (2004). Employee attitudes and job satisfaction. Human Resource Management, 43(4), 395-407.

[25]. Van Dijke, M., De Cremer, D., & Mayer, D. M. (2010). The role of authority power in explaining procedural fairness effects. Journal of Applied Psychology, 95 (3), 488-502.

[26]. Wilson A., Valarie A Z., Mary J. B., & Swayne, D. G. (2008). Services marketing: Integrating customer focus across the firm. The McGraw-Hill, New York, NY 10020. Student literature

[27]. World Health Organization (2017). Code of ethics and professional conduct. 04.