



Contractor Code of Conduct

Bupa Villages and Aged Care New Zealand

Version 1.4



Bupa views its contractors as partners and cares about the way our contractors do business

At Bupa, we use various external services and products to support our people in providing the highest standard of care to our residents, this includes the use of professional and qualified individuals and our external service providers and contractors' network. Whilst these are provided as a separate entity to Bupa, the outcomes from sourcing to delivery provided impacts Bupa and requires our partners to work with us with high moral character and discipline. Our Code of Conduct is intended to, guide Contractors to better understand our business model and communicates our business risks and minimum expectations.

All Contractors are to adhere to:

- Meet all legal requirements and industry standards;
- Prioritising safety by risk impact and overall safe work practices.
- Treating our customers with dignity and respect;
- Protect privacy and confidential information;
- Report hazards, incidents and concerns immediately;
- Always Follow our Contractor Management procedures;
- Ensure ethical behaviour is met

Please ensure you understand your requirements as a Bupa Contractor and reach out to your Bupa representative should you have any questions. A table summary has been provided to help navigate when the situation arises below.

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Our Code of Conduct Statement

Bupa's purpose is helping people live longer, healthier, happier lives and making a better world. We recognise the direct link between the health of society and the health of our planet. We are committed to engaging millions of people around the world in their health and wellbeing thanks to our healthcare expertise, whilst seeking positive impact on the environment and our communities. We live by the Bupa Code which means caring for our customers over the long term, building trust and strong relationships with our communities – and protecting our colleagues, partners, residents', and Bupa's reputation.

The objective of this document is to clearly articulate Bupa's expectations of our "Contractors" in-line with our Third Party Management that is embedded within Bupa's Risk Management Framework. The definition of "Contractors" for the purposes of this document is sole traders, companies or person providing a service and engaged by Bupa to carry out works on its behalf, including their employees and sub-contractors. These may be cleaners, kitchen, or laundry assistants; service contractors such as gardeners and pest exterminators; repair and maintenance contractors; electricians; plumbers, Builders and Project Managers etc.

In addition to Bupa's Contractor Code of Conduct, Contractors are to adhere to all terms agreed between Bupa and the Contractor in any contracts, all relevant legislation for the works being carried out, including but not limited to the *Building Act 2004*, the *Construction Contracts Act 2002* and the subsequent amendments; the relevant building codes, *Retirement Villages Act 2003*, *Health and Safety at Work Act 2015*, any Modern Slavery legislative provisions as they come into force, New Zealand Long-term residential care Ministry of Health, Te Whatu Ora requirements.

We ask that you read, in combination to this document, Bupa's Supplier Code of Conduct in relation to our expectations around compliance with *Modern Slavery* and responsible sourcing of materials and human rights. Bupa is committed to partnering with companies with more ethical expectations such as human rights, workplace conditions, environmental sustainability, diversity and inclusion and that includes our contractors across New Zealand.

Working at a Bupa Care Home or Village

Working in proximity to our elderly residents means you may have interactions with them, during this time we ask that you conduct your work with the utmost respect whilst in their home. Most of our homes cater for people living with dementia and other cognitive impairments, even though you will not be caring for our residents you may observe a person trying to communicate with you through verbal or non-verbal actions, reactions and behaviours. This is called a resident's 'expression of need'. Smiling and just saying "Hello, My name isI'm here to fix the " can put the resident at ease. If you are concerned about a resident, or the safety of yourself or others, please seek a Bupa employee to provide assistance.

Individual residents may be curious and want to be included by watching you carry out your work, whilst others may be agitated by noise coming from your tools. Bupa Care Home employees will take every measure to ensure that residents who are affected by noise or have respiratory concerns will be relocated during the works, but as a courtesy we ask that you inform our home Management on the day of any specific tools or chemicals you may use that could emit dusts, fumes, gases or any loud noises, so that we can adequately plan activities around your working times. If you notice a resident is distressed whilst you are carrying out loud works, please pause the activity until a Bupa employee can assist the resident.

In some circumstances you may find a resident who is frightened, this is generally because they cannot recognise certain people or places. Or something might trigger an earlier life experience that is uncomfortable or frightening for them to remember. We ask you to consider yourself and surroundings when you come onto the premises. Wearing hats or hoodies which disguise your face, could cause distress and we ask that you remove these when you are indoors or in an area visible to residents.

This also applies for your tools being left in an accessible place when you're not there. Some of our residents may have been in a trade or manual labour occupation prior to retirement, giving them a sense of confidence to "fix" things. It is important that you ensure that any tools and/or equipment are constantly monitored by you and your team by keeping these within arm's reach and within your field of view, so our residents can't access and put themselves or others at risk of injury.

Manual handling of residents requires specific and ongoing training to ensure that the activity is conducted safely for frail persons. Because of this, we ask that you please not touch residents unless there is an immediate danger i.e. before a fall. However, if the resident has already fallen, please do not attempt to pick them up, but notify a Bupa employee who will arrange for a Registered Nurse to carry out a clinical assessment. Where a person is attempting to leave the home, please observe them and immediately contact a Bupa employee to assist them rather than attempting to intervene which could result in the individual becoming distressed.

Privacy and Rights

Privacy and Dignity

- Please ensure that you respect each resident's privacy and do not enter a resident's room without knocking and asking a residents' permission (when present) and under the presence and agreement of a Bupa employee.
- Please address each resident and Bupa employee by their preferred name and communicate in a pleasant and professional manner.
- Should you be working in an unoccupied room without a Bupa employee present and a resident enters, please ensure your tools are secure and safe, before looking for a Bupa employee to assist the resident to be relocated whilst you carry out works in the room.
- If you have any problems with any of our residents, please approach our staff to assist you.

Confidentiality

While working on a Bupa site you may hear information about our business or residents. This is to be treated confidentially and not discussed or shared.

Speak-Up

We want Bupa to be a place where our people speak up when they have a genuine concern about wrongdoing, misconduct, a breach of the law or a risk of harm.

We are committed to upholding human rights and combatting modern slavery. If something isn't right, we want you to say something. Please speak with our General Manager or use Speak Up our confidential service. Every report is taken seriously and you can remain anonymous if you prefer.

You don't need to be a Bupa employee to use Speak Up — contractors can report issues as well. If you have a genuine concern, speak up through this link: [EthicsPoint - Bupa](#)



H&S Compliance Management

Site Induction and Ongoing Site Visits

- Prior to commencement of any work on a Bupa site contractors must complete the Bupa Induction online for each premises they attend, with the appropriate records to support your qualification to conduct the work.
- The inductions are valid for a maximum of 12 months and needs to be repeated when required.
- If the Contractor has any employees and/or sub-contractors who cannot clearly understand English, the Contractor is to provide someone to assist in translation to ensure they understand all of Bupa's requirements.
- Contractor-inductions will be held within a Contractor Management System.
- **Each Visit** All Contractors are to be authorised to attend, **sign in AND out** of Bupa's Contractor Management System, and notify a Bupa representative of your departure for work summary, this means:
 - In a Care Home or Multi-Story retirement villa, greeted at reception and escorted; or
 - In a Village at a separate villa, via notifying the Bupa representative responsible for engaging you to work.

Contractor competency

It is expected that Contractors have the appropriate skills and qualifications to perform the role they have been engaged to do. Where the contractor does not have the required skills to carry out the task, the contractor is expected to advise the Bupa representative before works commence.

Industry Changes and Construction Related Risks

- Critical safety risks are to be prioritised; however, **all safety risks** are to be understood and risks documented (with the
- As WorkSafe release Approved Code of Practice's (ACOP) for identifying health & safety roles and responsibilities for your industry i.e. draft 2026 residential construction site ACOPs. Bupa requires all workers to be informed and adapt their safety processes (where the ACOPs have a higher standard of safety than current safety practices).
- Contractors are to deliver sustainable building practices whilst working with us. Bupa encourages the greater use of healthy and sustainable materials to help us work towards reducing our carbon footprint. Where you observe areas of improvement for product and material selection, please engage with our Regional Property Managers to collaborate on effective application. Contractors are also to ensure that the equipment they use, how your waste is managed and the preservation of the surrounding site and land disturbance is minimised as far as reasonably practicable. This includes minimising waste i.e. separating waste types to prevent contamination to ensure recycling occurs (metal, timber, concrete, plastics, etc.) where possible, only procuring materials needed (where possible at correct size) and any other strategy to minimise landfill waste.

Hazards, incidents, and consultation

- Bupa evidences its collaboration and due diligence with contractors for safety through our Contractor Management system. It is a mandatory requirement for the Head Contractor or Independent Contractor responsible for the engaged work, to upload a Safety Analysis into Bupa's Contractor Management System and have that document reviewed by a Bupa representative **prior to commencing work**, ensuring the following minimum expectations have been applied:
 - o Hazard management assessment is to be proportionate to the level of risk i.e. Critical or High-Risk Construction Work (HRCW) requires an advanced analysis; whereas a low-risk Job Safety Analysis (document names will vary based on your business' practices). But if there is no template for your company, Bupa accepts Site Safe's Site-Specific Safety Plan "SSSP" as appropriate templates.
 - o Workers who will perform the works have been consulted during the development.
 - o Workers outside of your engagement i.e. other PCBU or Bupa employees working within the area have been notified to ensure safe practices.
 - o All relevant Personal Protective Equipment "PPE" and safety signage must be used and supplied by the Contractor, as well as being recorded in the Safety Analysis for each task performed.
 - o Bupa will **not accept** standard operating procedures as a Safety Analysis. This information can be provided and referred to, but site-specific risks are to be documented to ensure we can communicate risks for all workers.
 - o Work is to be performed as described in the Safety Analysis documentation. Should an unforeseen event occur, Contractors are to:
 - i. Make safe the environment
 - ii. Cease work and notify the Bupa representative who engaged you.
 - iii. Update the Safety Analysis to include the new hazard.
 - iv. Consult with the Bupa representative and upload into Bupa's Contractor Management System for digital confirmation of the documentation provided prior to re-commencement.
 - o Contractor responsible is to monitor their workers and controls to ensure they remain effective whilst works are conducted.
- All incidents (including near misses) incurred by contractors must be managed appropriately by the principal contractor and **reported as soon as practical** to the site's Bupa General Manager AND Regional Property Manager or Bupa representative. All incidents will be monitored by Bupa or its nominated representative and communicated to the Care Home / Village Management (where operational) and the Bupa WHS Team, to ensure all parties residing and working on the premises are aware and safe until the item is closed out.
- Contractors and their subcontractors must fully cooperate with any incident, near-miss, or safety-related investigation undertaken by Bupa. This includes providing information, documentation, statements, and access to Bupa personnel as required. Contractors must also conduct their own investigation where appropriate and share relevant findings with Bupa.
- Hazards not related to your work, may be reported by completing a Bupa Hazard Log. You can work with the Maintenance Officer to complete the form. The Maintenance Officer will then provide the form to the General Manager to review and enter in Bupa's risk management system.

Non-Compliance

- Bupa will at random have representatives observing your adherence to various legislative controlled activities (including health and safety practices). Where non-compliance by the Contractor for works undertaken occurs a Contractor Non- Compliance report will be issued to the Contractor.
- A Bupa Representative may suspend work if the work poses a risk.
- The Contractor must propose appropriate corrective actions and timeframes that are acceptable to Bupa who will monitor the remediation via its risk management system.
- Ongoing non-compliances may result in review of the contract agreement.
- If the contractor fails to rectify any non-conformance for which work has been suspended, or if the contractor's performance has involved recurring non-conformance or incidents, Bupa may terminate the work in accordance with contract terms.
- Contractors may be held responsible for any costs incurred to Bupa Care Services NZ Limited or Bupa Retirement Villages Limited, where they have carried out unsafe work practices and/or used unsafe equipment.

General Wellbeing, Health & Safety

Bupa is committed to ensuring the safety of its residents, employees, visitors, and Contractors / Service Providers.

- Every contractor is responsible for ensuring inside Bupa's Contractor Management System they have the appropriate licences, training, insurances, permits and health and safety documentation prior to carrying out the work. If they do not have this, they are to notify Bupa and not proceed until it is achieved or reassigned to someone who can.
- At minimum all contractors and their subcontractors must comply with the Health and Safety at Work Act 2015, all applicable regulations, relevant Approved Codes of Practice, and WorkSafe New Zealand guidance. **Engaging contractors** are responsible for ensuring that any subcontractors they engage meet these requirements.
- Any work conducted is to avoid injury and damage to property.
- Bupa's health & safety statement is available on request
- All workers are responsible for minimising safety risks to as low as reasonably practicable at all times.
- Companies are to upload a copy of their Health and Safety documentation to Bupa's BupaShop system during engagement and updating when changes occur to your business' health and safety framework.
- All contractors and subcontractors must always wear the required personal protective equipment (PPE) while conducting works requiring the PPE on site. PPE must be fit for purpose, used correctly, maintained in good condition, and replaced when damaged or expired. Failure to comply with PPE requirements may result in removal from the site. During an infectious outbreak (e.g., gastroenteritis, influenza, or COVID-19), additional PPE or restrictions may apply, and contractors must follow all infection-control instructions provided by the facility.
- Maintain the environment of the home by keeping resident, employee, and storage areas clean and tidy during and at the conclusion of the work. It is Bupa's expectation that Contractors secure and make any working areas safe at the end of the day or before leaving the work area unattended.

Parking

- Designated parking areas can be provided, please observe our requirements. If your vehicle is required on onsite, please communicate with the General Manager / Village Coordinator or Maintenance Officer before you commence work to see how we can accommodate.

Smoke free environment

- Bupa is committed to a smoke free environment. It is not permissible to smoke / vape on the site or within 5 metres of an entrance to a Care Home or Village, surrounding gardens, driveways, or in front or behind the building. Please leave the Bupa grounds to undertake this activity.

Work Environment

- The Contractor will be responsible for maintaining a clean and tidy workspace. All waste is to be disposed of in-line with relevant legislation i.e. asbestos is to be removed by a licenced professional and not placed in general waste.
- All precautions must be taken to minimise exposure to environmental hazards such as noise, dust, fumes, gases, offensive odours, and vapour.
- For works in active areas, barriers and a spotter may be required, please ensure you have one available and discuss this with Bupa staff

Plant and equipment

- All plant and equipment required for works must be provided by the Contractor and cannot be stored on the premises after working hours, without the consent of the Bupa General Manager, Regional Property Manager or Bupa representative.
- Equipment used by the Contractor must comply with all WHS legal requirements and Industry regulations.
- Contractors are required to be able to evidence all necessary licences and training for the use of the required equipment.
- Contractors must be able to provide evidence of equipment maintenance, certification, and calibration (where applicable) on request.
- Equipment especially tools must not be stored or left unattended in areas accessible by residents and visitors.

Fire and any other Emergency Safety

- Where any accessibility adjustment is required for emergency procedures, the Contractor is responsible for notifying the Bupa Representative / Head Contractor to implement a Personal Emergency Evacuation Plan (PEEP) to support an aided escape during emergency event. PEEPs could be triggered by a physical, sensory, neurological, or intellectual impairment, mental illness, or a person who is unable to sense or understand a fire alarm or leave a building in a fire emergency in the same capacity that a person without the same disability could.
- Where a Head Contractor is managing a project, it is their responsibility to develop a PEEP for any Contractor or Subcontractor engaged under their project. Where work is conducted in a co-managed premises with Bupa they are to communicate to the Bupa General Manager so all Wardens on duty at the time the Contractor is present is aware of the adjustment requirements.
- The Contractor must be familiar with the site evacuation procedures and fire procedures, location of firefighting equipment, fire exits and evacuation assembly points prior to commencing works.
- The Contractor must take all practical measures not to restrict or impede fire exits or access to fire-fighting equipment.
- The Contractor must submit a hot work permit and await approval from the Regional Property Manager, prior to commencing any task that may produce a source of ignition. As well as understand some environments may have highly flammable substances i.e. oxygen cylinders and this is to be relocated (where able) or documented within the Safety Analysis documentation.
- Wall penetrations must not occur without building consent when exceeding 300mm's in diameter OR where it modifies or affects the primary structure of the building / any specified system. Bupa have fire-cells throughout our buildings', Contractors cannot proceed to penetrate any walls which are or suspected to be a fire or smoke-wall until otherwise confirmed. Where penetration to a fire cell is to occur, the Regional Property Manager is to be consulted and where consented, a floorplan markup of the area for Bupa to arrange rectification works by a passive fire specialist and certification.

- In the event of a fire alarm, drill-or evacuation, turn off all powered equipment make your area safe and evacuate. Ensure you check in with a site Manager to mark you as attended on Bupa's Contractor Management System and follow instructions from the fire wardens.

Hazards and High-Risk Construction Works

Asbestos and Hazardous Materials

- An Asbestos Register is available from reception and is to be reviewed prior to works commencing.
- If the building is constructed prior to 1 January 2000 and there is no asbestos register and requires destructive work a destructive asbestos test is to be carried out by a licenced professional before works can commence.
- Works must not commence or continue until any hazardous material is removed / managed by a licensed / accredited Asbestos Removalist.
- The Contractor must immediately notify the Regional Property Manager and Maintenance Officer or General Manager if the presence of asbestos containing material is discovered or suspected prior or during works.
- All works removing or disturbing asbestos or asbestos containing materials must be documented, photographed and located on a map, and Provided to the Regional Property Manager for Bupa to update the asbestos register.

Site Management and Security

- Unauthorised use or removal of Bupa equipment is not permissible.
- Entry into sections of a Care Home or Village not relevant to the Contractors' work or designated work area is not permissible.
- Please leave all doors in the same state i.e. open, shut or locked, to ensure the safety of our people. If a door you have previously observed as closed has been left open and unattended, please close and notify a Bupa employee i.e. nurse's station.
- Please do not allow a person to tailgate behind you into any section of the home / village and refer anyone who is entering into a restricted area who is not in a Bupa uniform to a Bupa employee to manage.
- Should you identify a security risk i.e. broken locking mechanism, ability to enter undetected etc. please immediately alert the General Manager.
- Please secure entry to your job area, especially where scaffolding is used or next to a secure gate.

Chemical and Substance Management

- Contractors must be able to provide a Safety Data Sheet (SDS) for all chemicals used on site. General Managers are to be notified if any chemicals being brought onto the property could impact human health. SDS for products used and brought onto the premises by the Contractor are maintained within a Dangerous Goods/ Hazardous Substances register.
- Hazardous Substance Risk assessments must also be available upon request.
- Chemical segregation and effective management must be always maintained.
- All chemicals utilised within Bupa premises or whilst undertaking duties on behalf of Bupa must be correctly stored and labelled in approved chemical specific containers.

Working at Heights

- Where possible, working at heights or the risks associated with working at heights should be eliminated or controlled. A High-Risk Works Analysis must be provided by the Contractor for any works at heights and only undertaken by contractors with evidence of appropriate and current training.

- Approved fall protection measures (harnesses, railings) must be provided, serviced as per regulations and implemented by the Contractor.
- Ladders must comply with relevant Australian / NZ Standards, the New Zealand Work Safe practice guidance and be in good condition. Only commercial / trade ladders with an industrial rating of 120 – 150KG to be used.
- Non-conductive ladders must be used for any electrical works.
- All scaffolding must comply with New Zealand Work Safe and SARNZ guidelines and be erected by a competent person (under 5metres) and certified personnel if over 5 metres.

Electrical Safety

- All power leads and portable electrical tools used by Contractors must be tested and tagged in accordance with the relevant New Zealand Electrical Standards.
- Residual Current protection must be always used.
- Electrical leads must not be placed in a walkway or walking path without a hazard assessment, with relevant signage to prevent a falls risk.
- Live electrical works must be discussed with the Regional Property Manager prior to eliminate or minimise risk.

Notifiable Works

WorkSafe requires the following notifications, to be raised to them:

1. Serious injuries, illnesses, or incidents occur i.e. any incident which requires (or would usually require) a person to be admitted to hospital for immediate treatment refer www.worksafe.govt.nz/notifications/what-events-need-to-be-notified/ for more information and process.

If you are notifying WorkSafe, please also ensure Bupa's Regional Property Manager and Head of Culture Safety and Wellbeing have also been notified. Where a notifiable incident has been inspected:

- Work in the affected area must cease where safe and practicable to do so.
- The incident scene must be preserved and secured until authorised to be disturbed.
- Evidence, including photographs, witness details, and relevant documentation, must be retained.
- The area may only be disturbed to assist an injured person, remove an immediate risk to health & safety, or as directed by emergency services or regulatory authorities.

Bupa will conduct, or participate in, a joint investigation with the Contractor as appropriate. Contractors are required to cooperate fully with investigations, provide requested information, and implement agreed corrective actions arising from incident investigations.

All contractor notifiable incidents and serious injuries will be recorded, monitored, and reviewed as part of Bupa's Contractor performance and safety management processes to support compliance, continuous improvement, and the protection of residents, workers and visitors.

2. If you are completing the following works, WorkSafe is to be notified prior to and at completion of works (below list is not extensive but to give an understanding of the variety of notifiable planned works):
 - i. Licensed asbestos removal
 - ii. Geothermal
 - iii. Particular hazardous work (please see www.worksafe.govt.nz/notifications/report-scheduled-or-completed-work/hazardous-work/ **for exclusions**):
 - Construction work with a risk of falling 5mtrs or more
 - Erecting or dismantling scaffolding with a risk of falling 5mtrs or more.
 - Logging or tree felling undertaken for commercial purposes
 - A Lift appliance which lifts 500kgs or more vertical distance of 5mtrs or more.
 - Work within a pit, shaft, trench, or other excavation area more than 1.5mtrs deep
 - Diving i.e. work undertaken underwater such as in a swimming pool or water storage tank.
 - Work which a person breathes compressed air.
3. For all instances of the above the Regional Property Manager, Head of Property Development and/or National Property Manager are to be informed (in conjunction with the Head of Culture Safety and Wellbeing).

Ethical Behaviour

Whilst working on behalf of and holding a relationship with Bupa, all Contractors are to act honestly, fairly, safely and with integrity in all dealings with residents, families, employees, suppliers and the wider community. No commercial, operational or time pressure justifies compromising these expectations.

At minimum, Contractors must:

- Work within the law and apply good moral character.
- Be honest and transparent in their dealings with Bupa.
- Make decisions free from improper influence.
- Treat all people with dignity, fairness and respect.
- Raise concerns where you observe unsafe, unethical or unlawful behaviour.
- Protect Bupa's reputation through professional conduct.

Bupa will terminate any arrangement with Contractor(s) who have been found to have purposely acted in an unsafe and unethical manner.

Bupa strictly prohibits:

Financial Crime

Bupa takes the prevention of financial crime very seriously. Bupa has a conservative approach to the prevention of all forms of financial crime and a zero tolerance for our employees, representatives and contractors who engage in any activity that relates to financial crime. Our contractors must comply with all policies and procedures applicable to them which relate to financial crime. Financial crime is broadly considered to be a risk, threat or incident associated with any of the following:

- **Bribery and Corruption** e.g. by way of offering, promising or the giving of a bribe; agreeing to receive or accepting of a bribe, or an illegal / improper incentive (including anything of value like a gift). This includes any references made in humour. This could include (but is not limited to):
 - o **Improper or inappropriate benefits:** This could include work which is carried out for the benefit of a Bupa representative personally (i.e. on their home) at a discounted/non-market rate or for free or for the benefit of a Bupa representative's friends, family or business at such reduced rate **that has been negotiated outside of Bupa's Procurement Teams knowledge**. This could include work carried out to show gratitude or other recognition for securing work with Bupa. There is a risk that such benefit may influence or be perceived to influence a decision making process;
 - o **Kickback payments** e.g. compensation for preferential treatment, or other secret or unreported payments;
 - o **Facilitation payments** e.g. payments to speed up routine actions such as planning or other consents;
 - o **Gifts & Entertainment (G&E):** The giving of gifts, prizes, hospitality or anything else of value to a Bupa employee or other representative of Bupa which is not specifically

permissible under Bupa's internal policies. In every case, Bupa employees are prohibited from accepting gifts which:

- are given during any tender or competitive bid process;
- are inappropriate e.g. any entertainment that is indecent or sexually explicit or which might otherwise adversely affect Bupa's reputation;
- include cash or cash equivalents
- are offered in return for something (quid pro quo); and/or
- which may otherwise have, or may be seen as having, an effect on a business transaction which has been or which may be entered into by Bupa

Any G&E offered to them in Bupa's Gift Registry within Bupa's Risk Management System regardless if that gift has or has not been accepted.

- **Fraud** (whether committed internally or externally) being an act undertaken dishonestly with the intention of misappropriating money or other assets or misrepresenting financial and/or accounting records in order to make a gain or cause someone else to suffer loss. This could include (but is not limited to):
 - The charging of unjustified or inflated invoices (including commissions);
 - The supply of unjustified or inflated financial or accounting records to support invoices.
- A breach of any laws, regulations or operational requirements relating to **sanctioned individuals, entities or countries**;
- **Money laundering** i.e. handling the proceeds of crime;
- **Financing any type of criminal activity**, including but not limited to terrorist financing, modern slavery (as further detailed above), etc.;
- Evading and/or **facilitating, assisting, aiding or abetting** the evasion of **tax payment responsibilities**.

Conflicts of Interest

- A conflict of interest occurs where the personal or professional interests of an individual are in conflict with, or are reasonably perceived to be in conflict with, the interests of Bupa or a Bupa customer. This includes personal relationships between our contractors and Bupa employees or customers where actions could be perceived as being unfairly preferential. Our contractors must comply with our policies and procedures in relation to conflicts of interest.

Drugs and Alcohol

- No person will be permitted to enter or work at a Bupa premises whilst under the influence of an illegal substance or legal substance that impacts your ability to carry out your work safely including some prescription medications (which is notified to you on the side of the packaging) or alcohol. Contractors are not permitted to consume or be in possession of alcohol or drugs on a Bupa site. If you are suspected to be under the influence, we reserve the right to notify ACC who may conduct an investigation.

Occupational Violence, Harassment, Intimidation, Discrimination and Bullying

- The Contractor must comply with Bupa's occupational violence, harassment, discrimination (including cultural sensitivity) and bullying policies. Bupa treats all instances of the above seriously and will not tolerate any person being Contractor or Bupa employee carrying out behaving in this manner. Bupa expects all individuals to provide an environment where Bupa's residents, employees, visitors and Contractors are free from any form of violence, harassment, discrimination and bullying. Any instances observed will be investigated and all Contractors are to comply with our investigations.

Social Media and Photography

Bupa understands from time-to-time Contractors will take photos of their workmanship. We ask that you respect the right of our residents, employees and other people located in the area at the time by not including them in your photos (this includes where you intend to remove through AI generate technology).

If any individuals are within the Field of View, please notify one of our employees to assist clearing the area prior to any photography.

Resident Rights and Protection

Bupa maintains a zero-tolerance towards all forms of elder abuse, neglect, and exploitation. The Contractor whilst on a Bupa premises has a duty to protect the physical, emotional and financial safety of our residents. The Contractor will not coerce or exploit our vulnerable customers and immediately notify our General Manager or use the speak up system where any action of this nature is observed.

Modern Slavery

The Contractor must comply with any New Zealand's Modern Slavery legislated practices. This includes but not limited to:

- Provide information on their suppliers and where materials and labour are sourced.
- Collaborate with Bupa to mitigate any modern slavery risks your company might be exposed to.
- Utilise Bupa's confidential speak up system where human rights have been violated to ensure appropriate management for sensitive matters.

Where you notice any of the above unethical practices occurring whilst on a Bupa site, we request that you notify the Regional Property Manager, Home / Village Manager or utilise the confidential complaints system at Reception to support our business in maintaining an ethical environment for all.

Revision History

Document Title	Owner	Review Date
Contractor Code of Conduct	Timothy Griffiths	Bi-Annual

REV	Description/Change	Author/Reviewer(s)	Date Effective
V1.0	First Release	Liss Balla (Property ANZ); Robyn Attoe (BVAC AU Dementia Services) Jamie Gibson (Head of Property Development) Sebastian Godolphin (UK Group Financial Crime) Liz van Deventer (ANZ WHS) Vicky Byles (NZ WHS) Tania Killeen-Noy (Procurement Manager)	1/7/2021
V1.1	Third party update for project and defect works	Daniel Angus (Bupa representative) Liss Balla (Property Compliance Manager ANZ) Michael Simmons (Regional Asset Manager NZ) Michael Ryan (Head of Property Planning NZ)	26/05/2022
V1.2	Annual review	Joel Tasker (Regional Asset Manager) Mike Simmons (Village Refurb Manager) Liss Balla (Senior Prop Compliance Manager APAC) Stephen Walsh (Regional Asset Manager) Michael Ryan (Head of Property Planning) Andre Chatfield (Head of Risk)	05/09/2023
V1.3	Annual review and inclusion of Contractor Management System use by contractors	Liss Balla (Senior Property Compliance Manager APAC) Mike Simmons (Village Refurb Manager) Terry YU (Health and Safety Specialist) Tersia Van Der Merwe (Head of Workplace Health & Safety) Lyle Myers (Regional Asset Manager and Compliance Lead) Joel Tasker (Regional Asset Manager) Michael Ryan (Head of Property Planning) Richard Stephenson (Director of Property)	05/09/2024
V1.4	Bi-Annual Review. Now includes AOP reference and additional risk management requirements.	Liss Balla [APAC Senior Property Compliance Manager] Michael Ryan [National Property Manager] Greg Price [Regional Property Manager] Mike Simmons [Regional Property Manager] Terry Yu [Health & Safety Specialist] Bruce McGrath [Regional Property Manager] Sharon Lehrke [Village Refurbishment Lead] Joel Tasker [Regional Property Manager] Luke Hodgkinson [Head of Property Development] Tim Griffiths [Finance Director]	20/07/2026