



Contractor Code of Conduct

Bupa Villages and Aged Care New Zealand

Version 1.3



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.

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.

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, 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 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 Dignity

- Please ensure that you respect each resident's privacy and should 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 nursing staff to assist you.

Confidentiality

- Ensure that you hold in confidence any information obtained in a professional capacity. Should you see something you do not agree with, please use our complaints system. Information on Bupa's complaints system is located at the reception of the site you are working at or reach out to the Bupa representative you are working with for further details (if you feel comfortable to do so).

General

- The Contractor will review with the Regional Asset Manager or Village Refurbishment Manager and site Bupa representative, all safety aspects of the contract prior to the commencement of work. It is expected that our Contractor has the appropriate skills and qualifications to perform the role they have been engaged to do. Where this cannot be met, the contractor is expected to advise the Bupa representative before works commence.
- The Contractor is responsible for providing their own Job Safety Analysis "JSA" / Risk Safety Assessment / Safe Work Method Statement "SWMS" and completing tasks in accordance with their documented safe work practices **every time they carry work out on our site.**
- The Contractor is responsible for completing tasks and the work in a manner that does not put Bupa employees, residents, visitors, and themselves at risk. At the completion of work the Contractor is to ensure the Bupa representative confirms the quality of work has met expectation.
- Any incidents, near misses or hazards must be immediately reported to the Regional Asset Manager, the Home / Village Manager, Maintenance Officer, or Bupa representative overseeing the work-
- All relevant Personal Protective Equipment "PPE" and safety signage must be used and supplied by the Contractor and recorded in the risk assessment for each task.
- All Contractors will be required to comply with Bupa's Work Health & Safety work instructions whilst on our premises. Service Providers and 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 by them.
- 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 you secure and make any working areas safe at the end of the day or before leaving the work area unattended.
- For sites where a Bupa's Facility Maintenance and Asset Management Register System exists, Contractors and Suppliers are to utilise.

Smoke free environment

- Bupa is committed to a smoke free environment. It is not permissible to smoke / vape 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.

Parking

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

Wellbeing, Health & Safety

- Bupa is committed to ensuring the safety of its residents, employees, visitors, and Contractors / Service Providers.
- Service Providers and Contractors must ensure that they provide all relevant safety documentation (including all training records and any permits and insurances) prior to carrying out works. Any work conducted by you is to avoid injury, damage to property and wastage.
- Bupa's health & safety statement is available on request

Site Induction

- The Contractor / Service Provider must undertake the Bupa national and site-specific induction, which must be completed prior to the commencement of work at the site for the first time.
- 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.
- Contractor-inductions will be held within a Contractor Management system, and confirmed by the Maintenance Officer / personnel appointed by Bupa prior to commencing work.

Signing In & Out

- All Contractors during business hours must report to reception / front office to notify the relevant Bupa employee of their presence. Outside of business hours, the Contractor must adhere to the directives of the person who has engaged them to carry out work.
- It is mandatory requirement for the Contractor to sign in on arrival and out upon departure using Bupa's Contractor Management System (at all times)

High Risk Works / Notifiable Works

All notifiable works are to be recorded with WorkSafe prior to works commencing, it is expected that this is uploaded into Bupa's Contractor Management System with your SWMS documentation

In addition, Bupa deems the following activities (but not limited to), as high-risk and require a high risk work consent to be completed prior to work commencing in Bupa's Contractor Management System.

Activities Bupa considers high risk works as:

- Work involving asbestos and/or asbestos containing material
- Handling / storage of hazardous substances and dangerous goods
- Entering / working in a confined space

- Demolition
- Trenching and evacuation work
- Installation or removal of tanks containing dangerous goods such as LPG tanks
- Live electrical work or work near electrical power lines
- Scaffolding or structural alterations that require use of temporary support
- Working at heights including working in an area where items can fall from height
- Hot works, such as welding
- Working near or on gas services
- Working with cranes

Site-Specific Safety Plan “SSSP” / Job Safety Analysis “JSA” / Safe Work Method Statement “SWMS”

These documents must describe the works to be completed, the associated hazards and the risk control measures that will be implemented and uploaded by the Contractor / contractors company into Bupa’s Contractor Management System.

Non-Compliance

- 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.
- Ongoing non-compliances may result in review of the contract agreement. The information given to Bupa will be entered into Bupa’s risk management system and monitored appropriately.
- If the contractor fails to rectify any non-conformance of WHS for which work has been suspended, or if the contractor’s performance has involved recurring non-conformance or incidents of WHS, Bupa may terminate the work in accordance with contract terms, depending on the severity of the issue.

Hazards, incidents, and consultation

- 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 Bupa Manager or representative AND Regional Asset Manager or Bupa representative (if related to a project or defect Villages Refurbishment Manager). 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.
- Hazards not related to your work / outlined in your risk assessment, may be reported by completing a Bupa Hazard Log. You can request a hazard log from the site’s Maintenance Officer or work with the Maintenance Officer to complete the form. The Maintenance Officer will then provide the form to the Care Home / Village / General Manager to review and enter in Bupa’s risk management system.

Plant and equipment

- All plant and equipment required for works must be provided by the Contractor.

- 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

- The Contractor must be familiar with the site evacuation procedures and fire procedures and 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 extinguishers, fire alarms, sprinkler systems, blankets, hydrants, and hoses.
- The Contractor must submit a hot work permit and await approval from the Regional Asset Manager, prior to commencing any task that may produce a source of ignition, such as welding.
- Bupa has a number of fire-cells throughout our buildings, because of this and the enhanced requirement Bupa has in protecting people, Contractors / Service Providers are not permitted to penetrate or carry out works on a wall suspected to be a Firewall or Smoke wall until it has been confirmed otherwise. Only a qualified passive fire installation specialist is permitted to carry out these works and they are to provide a map of proposed / new penetrations to the Maintenance Officer and Regional Asset Manager for approval.
- In the event of a fire alarm, drill (through Bupa's Contractor Management System) or evacuation, turn off all powered equipment and make your area safe. Await emergency and evacuation instructions from our dedicated fire wardens.

Asbestos and Hazardous Materials

- An Asbestos Register is available from reception, as well as Bupa's Contractor Management System 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 Asset Manager and Maintenance Officer or Village / Home Manager if the presence of asbestos containing material is discovered or suspected prior or during works.

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. for the Care Home or Village, please immediately alert the Care Home / Village Manager.
- Please secure entry to your job area, especially where scaffolding is used or next to a secure gate.

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.

Chemical and Substance Management

- Contractors must be able to provide a Safety Data Sheet (SDS) for all chemicals used on site. 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 observed at all times
- 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 SWMS must be provided by the Contractor/Service Provider for any works at heights.
- Approved fall protection measures (harnesses, railings) must be provided, serviced within regulations and implemented by the Contractor/Service Provider.
- Ladders must comply with relevant Australian Standards / New Zealand Work Safe practice guidance and be in good condition. Non-conductive ladders must be used for any electrical works.
- All scaffolding must comply with relevant Australian Standards / New Zealand Work Safe practice guidance and be assembled and used by licensed personnel.

Electrical Safety

- All power leads and portable electrical tools used by Contractors on a Bupa site must be tested and tagged in accordance with the relevant New Zealand Electrical Standards.
- Residual Current protection must be utilised at all times (portable RCD's to be utilised by contractors where appropriate).
- Electrical leads must not pass over walkways. Where this is necessary appropriate segregation or falls management must be implemented so, please communicate the need to pass over walkways with our site's Management team.
- Live electrical works must be discussed with the RAM prior to being carried out to ensure the appropriate steps have been taken to avoid where possible, and a plan created to ensure all steps are to be taken to carry out this work safely.

Comments, Suggestions and Complaints

- Any Contractor who wishes to make a comment or complaint is encouraged to discuss the matter directly to the person in charge at the time. If the matter is urgent, speak to the Home / Village Manager or delegate.

Ethical Behaviour

At Bupa, no job is so important or urgent that it cannot be done safely and ethically.

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);a 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 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.

Should you notice any of the above unethical practices occurring whilst on a Bupa site, we request that you notify the Regional Asset 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	Richard Stephenson	Yearly

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