1 Introduction

This Contractor Code of Conduct (Code) provides guidance and sets out the minimum requirements for contractors, suppliers and consultants (Contractors) when engaging in business activities with Prudential Investment Company of Australia Pty Ltd (PICA). This includes the purchasing and supply of goods and service and the contracting out of activities and services that are not core activities of PICA.

PICA’s employees are required to maintain high standards of integrity and ethical conduct, consistent with the positions of trust they hold. We expect that all Contractors and their employees and subcontractors respect our employees’ commitment to these standards and comply with the same principles whilst undertaking business activities with PICA.

For Contractors the likely reward for maintaining ethical business dealings with PICA is an enhanced reputation and repeat business.

Failure to comply with this Code may include damage to reputation or the reduction or termination of the relationship with PICA. In some cases, unethical behaviour may result in the matter being investigated by a third party auditor appointed by PICA, the Strata Community Australia NSW Ethics Committee or referral to the police.

This Code is designed to ensure that business relationships between PICA and Contractors, both actual and potential, are fair and productive for all parties by:

- Providing guidelines on what each party can expect from the other and explaining the mutual obligations, roles and constraints of all parties to an arrangement.
- Outlining PICA's ethical standards and our expectation that Contractors will comply with these standards in all of their dealings with us.

2 The key principles of this Code

PICA is committed to the highest standards of business integrity. We do not tolerate any practice that is inconsistent with the principles of honesty, integrity and fairness.

PICA seeks to identify Contractors that conduct business with ethical standards consistent with our own, which are to be met by adhering to the following principles:

- **Value for money**: Value is determined by considering a number of factors such as cost, quality, reliability, service and benefits over the life cycle of the goods and services procured.
- **Transparency**: maintain appropriate documentation and records of all business dealings to allow for effective reviews and audits.
- **Accountability**: Being able to justify actions or decisions as per regulatory, audit and other applicable requirements.
- **Fairness**: Being unbiased, reasonable and even-handed in all assessments and decisions.

In addition to the key Principles, PICA is committed to the high standard of:

- **Presentation**: Appearance of staff and work environment.
- **Responsive**: Promptly and efficiently act on customer’ requests.
- **Individual**: Treat me as a person, not as a number.
- **Dependable**: Get it right the first time, every time.
- **Enterprising**: Going the extra step.
3 What you can expect from PICA

PICA will endeavour to ensure that its policies, procedures and practices related to tendering, contracting and the purchase of goods or services are consistent with best practice and high standards of ethical conduct.

PICA employees are expected to comply with the law and with all relevant policies and procedures. In particular, our employees are bound by PICA’s Conflict of Interest Policy, Conduct and Compliance Procedure - Acceptance of Gifts, Benefits and Hospitality, Procurement Procedure, Code of Conduct, and other related policies and procedures. As a member of the Strata Community Australia (SCA), PICA employees are also bound by the SCA Code of Ethics.

When doing business with potential or actual Contractors PICA employees are accountable for their actions and are expected to:

- comply with PICA's policies and procedures
- deal fairly, honestly and ethically with all individuals and organisations that supply goods or services to PICA
- avoid any conflicts of interest where an employee could be influenced, or could be perceived to be influenced, by a personal interest in carrying out their duty to PICA
- disclose any actual, potential or perceived conflicts of interest where PICA employees personal interests or activities may affect the employees ability to be impartial to decisions
- refuse improper rewards or gifts that are intended to, or are likely to create the perception that they may act in a partial manner in the course of their duties
- accept responsibility and always be accountable for actions in accordance with delegated functions
- always act with care and diligence, utilising organisational resources in a proper manner
- observe the law whereby all employees must comply with all legislative or administrative requirements relevant to their position and any guidelines issued by PICA concerning the performance of their duties
- encourage fair competition whilst seeking value for money
- ensure all relevant potential Contractors are given equal access to information and opportunities to submit bids
- will not use a quotation from one Contractor to secure cheaper quotations from another Contractor. (Bid/Quote shopping)
- ensure all procurement or disposal activities and decisions are fully and clearly documented to provide an effective internal audit trail, allowing for effective performance review of contracts
- endeavour to ensure tenders will not be called unless PICA has a firm intention to proceed to contract
- endeavour to ensure PICA will not disclose confidential or personal information unless legally compelled or able to do so
- present an official PICA work order or contract order when procuring goods and services on behalf of PICA or PICA’s clients
- purchase, wherever reasonably commercially feasible, energy efficient equipment, products containing recycled materials and environmentally friendly products
- only issue Work Orders to Contractors that have been authorised and are available for selection through Community Select
- are not to solicit incentives, favours, hospitality, gifts or benefits in connection with their employment
- work to 30 day payment terms from day of receipt of a correctly rendered invoice
- PICA only permits its employees to accept gifts, benefits or hospitality if:
  - gifts are token and of nominal value and will not affect the employees ability to make objective business decisions in the best interest of PICA or their clients;
  - the offer is not from a potential Contractor during the procurement/tendering process
  - the offer is not a repeat offer in any one calendar year; and
  - the offer is not considered to be inappropriate.

Cash and negotiable instruments: gifts of cash, gift card or negotiable instruments of any value are prohibited.

Bribes or other means of obtaining undue or improper advantage are not to be offered or accepted.
When doing business with PICA potential or actual Contractors are expected to:

- comply with PICA’s procurement policy, procedures and Codes of Conduct
- meet the (following) set minimum requirements as verified through Community Select:
  - Must be registered as a business for tax purposes in Australia
  - Must have a minimum $20 million Public & Product Liability Insurance (in respect of each and every occurrence and unlimited in aggregate for any one period of cover)
  - Must have a minimum $1 million Professional Indemnity Insurance (where applicable)
  - Must have Statutory Workers Compensation insurance for all employees or Personal and Accident Insurance for Sole Traders
  - Must hold all licences as relevant to services provided
  - Must have an established Quality Management system (Consultants only)
  - Must have a Health & Safety Management Policy
  - Must accept the PICA Terms and Conditions of engagement and this Code of Conduct.
- only undertake work which they completely licensed, insured, qualified and capable to perform
- respect and comply with the terms and conditions as contained in documents as agreed with PICA (including any Work Orders, Purchase Orders or Contract Orders)
- provide accurate and reliable advice and information when requested
- refrain from supplying goods or services to PICA until such time as they are in receipt of a formal PICA Work Order or in emergency cases have received details for a credit card transaction or another form of written confirmation
- perform all services diligently and with competence
- declare to PICA any actual, potential or perceived conflicts of interest as soon as they are aware of same
- act ethically, fairly and honestly in all dealings with PICA
- take all reasonable measures to prevent the disclosure of confidential PICA information
- refrain from engaging in any form of collusive or other anti-competitive practice
- not offer inducements or incentives (such as money, gifts or offers of entertainment or employment opportunities) to PICA employees where this might influence or be seen to influence the conduct of their duties
- must not use PICA introductions or any information obtained from PICA to negotiate directly with PICA clients
- ensure that all PICA information not in the public domain is treated as confidential unless otherwise indicated. Confidential information includes customer data, personal data, commercial performance data, corporate strategies and business plans, marketing and pricing strategies, trade secrets, intellectual property, and the like, in any form including electronic.
- ensure all communications are clear, direct and accountable
- assist PICA to prevent unethical practices in our business relationships and dealings
- ensure that all employees are paid no less than the appropriate award wage or where no award wage exists, no less than market value
- ensure that all employees are compensated appropriately for any over time at the legally mandated premium rates, and that they are not required to work overtime in order to earn minimum wage and receive all statutory benefits and or insurance mandated by applicable laws and regulations
- as the principal contractor and expert in your trade you will be deemed the “Principal Contactor” and will be responsible for any and all sub contractors you choose to employ and must ensure they are aware of and adhere to this Code of Conduct. Their conduct and work practice will be subject to your responsibility and they should be supervised by you at all times
- ensure that all subcontractors are paid in full for their goods and services in accordance with their payment terms and when asked provide evidence and or statutory declarations confirming compliance with this item
- ensure that employees and subcontractors only work the maximum hours and take all required breaks
• provide access to PICA elected auditors to information regarding business activities, structure, financial situation, supply chain, subcontractors and performance. (Falsification of records or misrepresentations of conditions or practices in particularly in the Contractor’s supply chain are unacceptable)
• provide invoices in the requested format and clearly stating the PICA work order or contract order number
• complete minor works contracts for work (includes services and materials) over $5,000 (no splitting of invoices permitted)
• provide appropriate Home Warranty Insurance for work (includes services and materials) over $20,000
• not use PICA name, logo, brand in any communication or media without prior written consent from PICA

5 When on site you will need to:
• carry and display appropriate credentials that clearly identify you and your company
• dress appropriately for work being performed and in accordance with the relevant legislation
• be respectful and courteous to all owners or occupants of the strata scheme
• be responsive and answer relevant questions in a polite manner
• provide sufficient notice for access to the lot and details of the scheduled work to owners or occupants and keep them informed of changes to the scheduled works
• keep the premises clean and tidy during the course of the works to the best of your ability and ensure that the premises are safe for the owner or occupant at the end of each day. The contractor is responsible for ensuring the area of the works meets the current health and safety regulations at all times and that work is being carried out according to the Safe Work Method Statement prepared by you
• avoid discussing matters that are not directly connected to the work being carried out
• obtain the owner or occupants permission before using their facilities

6 As a Contractor you will not:
• use offensive language, play loud music or engage in loud or boisterous behaviour
• smoke or consume alcohol or drugs while in the building or on common property
• bring visitors unrelated to the work, pets or other animals to the work site
• interfere with or mistreat an owners pet or other animals
• block driveways, paths or parking areas without the written permission of the strata scheme
• use any part of the scheme for the storage of tools or supplies without the prior permission of the strata scheme
• enter or remain in a lot without the owner or occupant being present unless prior arrangements have been made

7 Why is compliance important?
By complying with this Code, relevant parties will be able to advance their business objectives and interests in a fair and ethical manner.

Parties should also be aware of the consequences of not complying with PICA’s ethical requirements when doing business with PICA. Demonstrated corrupt or unethical conduct could lead to:

• termination of a contract or contracts
• removal from PICA’s approved Community Select contractor database
• damage to reputation
• potential long term loss of future work due to damage to reputation
• formal investigation for corruption and other offences; and/or
• matters being referred for criminal investigation.
To uphold this Code, PICA reserves the right to carry out the controls that it deems necessary to ensure that this Code is respected throughout its Supply Chain. This may include self-assessments, PICA audits and third-party audits of Contractors.

8 Who to contact

If you have any questions regarding this Code or wish to provide information about suspected corrupt conduct, please contact the PICA Risk and Quality Manager.