



---

# CONTRACTOR CODE OF CONDUCT

JUNE 2025

## CONTENTS

<b>Introduction .....</b>	<b>3</b>
<b>1.1 Health and Safety.....</b>	<b>4</b>
1.1a Tenant welfare and wellbeing .....	4
1.2 Parking and Storage .....	4
1.3 Cleaning up .....	4
1.4 Difficulties Encountered on Properties.....	5
1.5 VISITORS .....	5
1.6 ANIMALS.....	5
<b>2 General Conduct Requirements .....</b>	<b>6</b>
2.1 Ethical Conduct.....	6
2.2 Ethical Supplies.....	6
2.3 Conflict of Interest.....	7
2.4 Confidentiality .....	7
2.5 Gifts and Benefits.....	7
2.6 Illegal Acts .....	8
2.7 Emergencies .....	8
2.8 Property Safety .....	8
2.9 Whistle Blowing.....	8
2.10 Courtesy and General Appearance.....	8
2.11 Language and General Behaviour.....	9
2.12 Smoking, Alcohol and Prohibited Substances.....	9
2.13 Noise .....	9
<b>3 ENVIRONMENTAL SUSTAINABILITY .....</b>	<b>10</b>
<b>4 Working with WHC's Tenants.....</b>	<b>10</b>
4.1 Tenants with Non-English Language .....	10
4.2 Prior to arriving at a Tenant's home .....	10
4.3 When first arriving at a Tenant's home .....	10
4.4 Protection of Tenant's Property and Belongings .....	11
4.5 Use of Tenant's Services and Facilities.....	11
4.6 Work During Absence of Tenant .....	11
<b>5 DECLARATION .....</b>	<b>12</b>

---

# CONTRACTOR CODE OF CONDUCT

## INTRODUCTION

This Contractor Code of Conduct (Code) supports the Women's Housing Company Limited (WHC) policy towards its Clients. WHC's Clients include Tenants of its residential properties to which the WHC is committed to providing a consistent and high-quality service. The WHC, its officers and representatives have a duty to Tenants and their household members to maintain high ethical standards, honour agreements and undertakings, act in good faith and always be courteous.

The Contractor has a similar duty to adopt high ethical standards, honour agreements and undertakings, and always be courteous. The Contractor must therefore ensure that its employees, its Sub-Contractors and the employees of its Sub-Contractors are familiar with the contents of the Code and always observe its requirements whilst working in and upon properties managed by the WHC.

All employees of the Contractor and its Sub-Contractors must read and comply with this Code. All Contractors and Sub-Contractor, must provide relevant licencing / qualification documents, and other evidence required by WHC, in order to be authorised to conduct work at any WHC properties.

The WHC welcomes feedback from tenants to understand their experiences and uses this feedback to shape service improvements. One method of feedback is the Annual Tenant Satisfaction Survey, where the repairs and maintenance service is a key metric. Random periodic surveys are also conducted, to determine satisfaction with individual repairs and maintenance jobs.

Another key feedback process is through complaints and appeals. The WHC encourages Tenants to raise matters for investigation and appropriate action, including the conduct of employees of the Contractor and its Sub-Contractors. Any complaint submitted to the WHC is investigated in accordance with our Complaints and Appeals Policy.

Contractors are required to inform WHC when using sub-contractors to complete works. Contractors are to communicate WHC expectations to all Sub-Contractors and staff attending WHC properties and expects they also adhere to this Code of Conduct.

## **1.1 HEALTH AND SAFETY**

All practical safety precautions should be taken to ensure the continued health and safety of people in and around WHC properties where work is being carried out.

It is the responsibility of the Contractor to ensure hazards and risks to physical safety or health are identified and managed. Hazards or incidents should be reported to WHC as soon as they are identified, and within a maximum of 24 hours from occurring.

All Contractor employees and Sub-Contractors must be appropriately protected from hazards, remunerated according to the relevant Industry Award and treated fairly and ethically. They must be appropriately trained so they work in a safe, hygienic and ethical manner. This includes a zero tolerance to workplace intimidation, harassment, bullying or abuse.

All works must be conducted in accordance with the requirements of the Work Health and Safety Act 2011 and the Work Health and Safety Regulation 2017. This ensures a safe working environment and protects workers from harm.

### **1.1A TENANT WELFARE AND WELLBEING**

Contractors must notify WHC right away if they learn of situations where a tenant's safety, welfare, or well-being is concerning, and the Contractor believes the tenant would benefit from assistance.

## **1.2 PARKING AND STORAGE**

All employees of the Contractor and its Sub-Contractors must not store any materials or equipment on the property without permission of the Tenant.

Anything stored at the property is stored entirely at the Contractor's risk and no responsibility for its security or safety will be accepted by the Tenant or the WHC.

Permission must be obtained from the Tenant before parking or placing any vehicle, site office, storage container or other facility in the grounds of their home, or on any verge.

Do not obstruct any driveway, footpath, crossing, road, pathways or any other access in the ground of apartments or neighbourhood precincts.

## **1.3 CLEANING UP**

All employees of the Contractor and its Sub-Contractors must regularly remove all rubbish resulting from works and leave the property in a clean and tidy state at the end of each day.

## **1.4 DIFFICULTIES ENCOUNTERED ON PROPERTIES**

It is not possible to define every event where it might be considered inadvisable to enter a property or advisable to leave after entering.

The following are examples of where decisions of this nature might reasonably be made by employees of the Contractor or a Sub-Contractor:

- Where persons appear affected by alcohol or other substances and entering or remaining at the property may provoke an undesirable situation:
- Where there are groups of people at or near the property who are behaving in a threatening way:
- Where the persons are agitated or displaying erratic or other inappropriate behaviour which may be a threat to personal safety:
- Any display of aggression by persons or animals; and
- Any instance where personal safety, the safety of others or the safety of machinery, equipment, and other property, is either in danger or under threat of danger, or where an unsafe situation has developed.

In these or similar circumstances, employees of the Contractor and its Sub-Contractors, if concerned for their health or safety, or the safety of their materials, tools or equipment, may leave the property providing they have acted reasonably.

Employees of the Contractor and its Sub-Contractors should not respond or argue and should politely decline to engage in non-essential discussion.

Employees of the Contractor and its Sub-Contractors must inform the Contractor of the situation immediately upon leaving the property. The Contractor's representative is responsible for advising the WHC.

## **1.5 VISITORS**

Personal visitors of employees of the Contractor and its Sub-Contractors are not permitted to enter the premises of a Tenant, including front and back yards, and common areas.

## **1.6 ANIMALS**

Animals or pets owned by employees of the Contractor and its Sub-Contractors are not allowed in or upon any property of the WHC.

Animals and pets owned by Tenants must not be antagonised or mistreated by employees of the Contractor and its Sub-Contractors.

When entering and exiting the property, employees of the Contractor and its Sub-Contractors must not pose a risk to a tenant's animals and pets escaping the property.

## **2 GENERAL CONDUCT REQUIREMENTS**

### **2.1 ETHICAL CONDUCT**

All employees of the Contractor and its Sub-Contractors must:

- Act ethically, fairly, and honestly in all dealings with the WHC and its Tenants.
- Assist the WHC to prevent unethical practices by reporting any misconduct related to our work, for example corruption, fraud, maladministration, or serious and substantial waste.
- Not, under any circumstance, comment on any matters relating to the Contract or the operations of the WHC. This includes discussion and comment on the condition of the WHC's properties and policies of the WHC.
- Not, under any circumstance, comment on or share information about matters of a personal nature of WHC's tenants such as conduct, appearance, ethnic origin, the condition of the property or on any issue relating to standard of housekeeping.

### **2.2 ETHICAL SUPPLIES**

Modern Slavery is reported to impact 50 million people worldwide, across all sectors of business and community. Approximately 18% of modern slavery victims are in the construction industry and 22% of forced labour is in raw material production. The Australian Government introduced the Modern Slavery Act in 2018. Modern Slavery risks occur in all operations and supply chains relating to building maintenance and repair. Due diligence processes in the purchasing and contracting of materials and labour are important ways that all businesses can contribute to the prevention of modern slavery and avoiding the risk that modern slavery occurs in our supply chains and operations. Modern Slavery refers to serious human rights violations where coercion, threats, deception is used to take away people's freedom.

WHC is committed to ethical practice and decision making across all operations, including the purchasing and procurement of building supplies. It is important to WHC to proactively identify the risk of harmful or unethical practices associated with the goods and services we purchase.

It is recommended that WHC Contractors consider the information provided by the [Australian Human Rights Commission and KPMG for managing risks in property and construction](#). This document suggests that an ethical human rights approach to due diligence means businesses prioritise addressing severe risks to people. Severe risks to people in relation to modern slavery are also risks to your business' reputation or revenue. An ethical approach requires you to ask yourself, and your sub-Contractors and suppliers the question *"how might people be harmed as a result of this business activity, decision or purchase?"*.

In the future, WHC will be seeking to scope environmental and ethical risks within its contracts and supply chains. This will include engaging relevant Contractors in a survey to understand the

operations that could pose a risk of unethical practices and environmental harm associated with WHC operations. We will be seeking your cooperation with our risk assessment in this area. WHC undertakes that all requests to Contractors will be reasonable. For example, we may ask about:

- Business structure, operations and supply chains.
- The risks of Modern Slavery and unlawful activity in operations and supply chains used.
- How Contractors assess and address risks, including due diligence with Contractor purchasing and sub-contracting.
- Any information or training that Contractors provide to staff and sub-Contractors about labour and purchasing.
- The process of consultation about Modern Slavery, and any other risk of unlawful activity.

## **2.3 CONFLICT OF INTEREST**

A conflict of interest is a situation in which a company or an individual, in a position of trust, has competing professional or personal interests. Such competing interests may make it difficult to operate impartially, and can create a perception of unfair treatment or favourable decision-making. This perception could lead to reduced confidence in the company or the individual, even if no unethical or improper act results from the conflict.

All employees of the Contractor and its Sub-Contractors must declare conflicts of interest as soon as they become aware of any potential, actual or perceived conflict.

## **2.4 CONFIDENTIALITY**

All employees of the Contractor and its Sub-Contractors must take all reasonable measures to prevent the disclosure of confidential information related to the WHC and its Tenants.

Contractors are not authorised to make public comments related to the WHC without the express written permission of the WHC.

Any suspected or actual breach of data relating to WHC should be reported to WHC as soon as possible. To secure WHC tenant's privacy, it is expected the Contractor will work closely with WHC to prevent unauthorised access to WHC related data or sensitive information. Any suspected data breaches should be reported immediately. Such reports should be both verbal by phoning xxx and email to [itsupport@womenshousingcompany.org](mailto:itsupport@womenshousingcompany.org)

## **2.5 GIFTS AND BENEFITS**

All employees of the Contractor and its Sub-Contractors should refrain from any form of corrupt conduct, including offering employees of the WHC gratuities, inducements, or incentives. Contractors should note that any gifts or benefits they offer to WHC that have a value more than \$20 must be declared by the recipient and documented in the WHC gift register. Any gift accepted by WHC will be shared by the whole WHC team.

## **2.6 ILLEGAL ACTS**

If any person sees an illegal act or crime in progress, they must immediately inform the Police. Bribery and corruption are crimes and not tolerated by WHC. It is expected that Contractors will refer all allegations to the appropriate authority and advise WHC of any situations where this is suspected during WHC works.

## **2.7 EMERGENCIES**

If there is an immediate danger to life or property, the appropriate emergency service must be called immediately by phoning '000' and also notifying the WHC.

## **2.8 PROPERTY SAFETY**

Employees of the Contractor and its Sub-Contractors are responsible for keeping the property safe whilst works are in progress. All possible safety precautions must be taken to ensure the health and safety of all persons in and around the property in which the work is being carried out. Ensure that clear and timely warnings are given of any hazards.

The possible presence of children must be kept in mind when manoeuvring vehicles or large equipment and mechanical devices.

Tools, especially power tools, must not be left unattended, as they may present a safety risk.

Holes and trenches must be made safe and covered with strong materials when left unattended.

## **2.9 WHISTLE BLOWING**

The WHC offers an independent Whistleblower Hotline run by Stopline.

WHC employees, Contractors and other stakeholders can make reports (anonymously, if required) of misconduct and other serious workplace issues such as theft, fraud, dishonesty, bullying and harassment, policy breaches, unethical behaviour, or workplace safety hazards.

## **2.10 COURTESY AND GENERAL APPEARANCE**

When visiting or working at a Tenant's home, other areas such as common grounds and neighbourhood precincts, all employees of the Contractor and its Sub-Contractors must:

- Always announce the name of the business and the purpose of attendance;
- Provide photo identification and outline the works to be undertaken;
- Show all occupants full courtesy and respect;
- Be of neat and tidy personal appearance and in a reasonable standard of dress;



- Ensure footwear and clothing is cleaned of mud, wet paint, grease, etc., before entering a Tenant's home;
- Treat the Tenant's home and personal property with due care and respect at all times; and
- Consider the Tenant's comfort, well-being, health, welfare, safety and security. Any disruptions to the occupants must be kept to a minimum.

## **2.11 LANGUAGE AND GENERAL BEHAVIOUR**

Bad language must not be used in the presence or hearing of any tenant, visitor, or employee of the WHC.

Loud and boisterous behaviour is to be avoided, as it can be threatening and offensive to others, especially the elderly and infirm, and those suffering an illness.

Ensure that personal behaviour does not interrupt nor threaten the general enjoyment by Tenants of their home and surrounding environment.

Do not be judgemental nor belittle a Tenant for any reason by attitude, tone of voice or action.

Do not make any derogatory or non-essential comments on the work of others who may have previously serviced a Tenant's home or on faults or problems the Contractor has been engaged to rectify.

## **2.12 SMOKING, ALCOHOL AND PROHIBITED SUBSTANCES**

Employees of the Contractor and its Sub-Contractors must not consume, or be under the influence of, alcohol or a prohibited substance whilst performing work under the Contract.

Do not smoke in any property managed by the WHC.

## **2.13 NOISE**

Take care to minimise noise. Tenant requests to limit noise must be respected.

Such requests may come from tenants who are shift workers, have young families, are ill or have suffered bereavement.

If agreement cannot be reached, the matter must be referred to the WHC for resolution.

The use of radios or other sound equipment in occupied properties and common areas (e.g. hallways, stairways, entrance areas in apartments, etc.), is only permitted with the approval of the Tenant or occupants using common areas in apartment buildings.

### **3 ENVIRONMENTAL SUSTAINABILITY**

WHC is committed to working with Contractors to promote a culture that values environmental protection and complies with [legislation and regulation](#). WHC supports the [Australian government's commitment](#) to reaching net zero emissions by 2050. Some considerations you are encouraged to make are:

- Reducing your use of pollutants and materials that are harmful to the environment from your products you use and using environmentally friendly sourced materials.
- Reducing waste in your operations.
- Reducing water waste in your operations.

### **4 WORKING WITH WHC'S TENANTS**

The WHC's Tenants include a wide range of people, some of whom have special and complex needs and should be treated with understanding and sensitivity, including older people, Indigenous Australian people, people from diverse cultural backgrounds, people who live with disabilities, suffer terminal illness or who have experienced trauma.

#### **4.1 TENANTS WITH NON-ENGLISH LANGUAGE**

The WHC is committed to providing equal service to all Tenants, including those with a main language other than English.

If communication with a Tenant proves difficult, the Contractor may request the WHC to arrange for an interpreter service, which is provided at the WHC's expense.

#### **4.2 PRIOR TO ARRIVING AT A TENANT'S HOME**

When phoning to make, confirm or change an appointment to inspect or conduct works at a Tenant's home, the Contractor's representative should introduce themselves and explain, in a friendly and courteous manner, the need to make, confirm or change an appointment to respond to their property's maintenance.

Agree with the Tenant on a convenient day and time to attend the property that is within reasonable working hours, and ensure the appointment is not unduly delayed.

#### **4.3 WHEN FIRST ARRIVING AT A TENANT'S HOME**

When first arriving at a tenant's home, the Contractor's representative should seek out the Tenant, show his or her Identification Card, and, in a friendly and courteous manner, ask if it is convenient to commence work.

To minimise noise and inconvenience to the Tenant, avoid, where practicable, driving any vehicle into the driveway of a property without first seeking the permission of the Tenant to park on the premises.

#### **4.4 PROTECTION OF TENANT'S PROPERTY AND BELONGINGS**

Take all reasonable precautions to protect the Tenant's belongings from theft or damage.

Immediately advise the WHC of any damage or loss that occurs to the property of the Contractor or the property of the Tenant.

#### **4.5 USE OF TENANT'S SERVICES AND FACILITIES**

Do not use a Tenant's power, gas, or water, without prior permission. Tenants must be reimbursed for all costs incurred where permission is given.

Do not use a Tenant's telephone to make or receive calls except in case of emergency.

Calls must not be diverted to a Tenant's telephone from mobile telephones or other communication services.

Do not use the Tenant's toilet, wash basin or cooking facilities without prior permission.

Do not prepare or eat food in the Tenant's house.

#### **4.6 WORK DURING ABSENCE OF TENANT**

It is not permissible to carry out work on a property where children aged under 16 years are present and are not supervised by an adult, unless approval is given by WHC.

Remaining in a Tenant's home during the Tenant's absence is not desirable and should be avoided where practicable.

Written permission must be obtained from the Tenant before working in a Tenant's home during the absence of the Tenant.

The property must be left in a secure state when unattended.

## 5 DECLARATION

I agree that I have received, read and understood the Women's Housing Company Contractor Code of Conduct and I agree to comply.

I acknowledge that not adhering to this Code of Conduct may result in a change in my contractual arrangements with WHC.

---

**Contractor Name**

---

**Contractor Signature**

---

**Contractor Role / Title**

---

**Date:**