

Policy

Statement of Business Ethics

Bridge Housing Limited's (Bridge Housing) mission is to build sustainable communities through the provision of quality affordable housing to low and moderate income families.

Bridge Housing holds a position of trust in the community. As a non-profit housing provider, we provide housing and make decisions each day that affect the lives of others. In everything we do; we are expected to act, and be seen to act, in the public interest.

We set high ethical standards for ourselves and we expect the same of our private sector partners and suppliers.

When you adhere to this Statement of Business Ethics, it tells us that you, as a partner or supplier, respect our responsibility to deliver an ethical service to our tenants and are committed to helping us achieve this.

We look forward to doing business with you.

John Nicolades

Chief Executive Officer

Who does our Statement of Business Ethics apply?

We require all employees, agents and anyone acting on behalf of Bridge Housing to abide by this Statement of Business Ethics. We also require our commercial partners to maintain similar ethical standards. We expect that our commercial partners will make their employees, agents, subcontractors or anyone working on Bridge Housing business aware of this statement and their obligation to respect its principles.

A commercial partner is considered to be any individual or organisation which enters into a contractual relationship to provide goods or services to Bridge Housing.

What are our core business principles?

We conduct all of our business activities with honesty, fairness and consistency. We aim to work within an open and competitive marketplace that achieves the best value for public money. We are committed to transparency in all of our business endeavours.

In the context of this statement, fairness means that we will be objective, reasonable and accountable for our decisions. We acknowledge that there may be differences between the way the not for profit and private sectors do business, and the expectations each has of the other. We will do our best to reconcile those differences in a way that respects the rights and obligations of both parties. We expect our commercial partners to take the same approach in their dealings with us.

We will balance all relevant factors in making its commercial decisions. These include, but are not limited to; initial and whole-of-life costs, quality, reliability and timeliness of delivery, as well as community and social policy imperatives.

What can you expect from our staff?

We believe that personal integrity is an essential part of Bridge Housing as a leading provider of affordable housing to low and moderate income families in NSW. Our staffs pledge to operate under and uphold the highest of ethical standards. In their commercial dealings on behalf of Bridge Housing, directors and staff are bound by our Code of Conduct and Conflict of Interest Policy. Our staff are required to carry out their duties using common sense and good judgment.

Acting in accordance with the Code, they are expected to:

- Act in a courteous, respectful and unbiased manner
- Communicate in a clear, direct and accountable fashion
- Use resources effectively, efficiently and economically
- Avoid conflicts of interest
- Keep accurate records of all business dealings on behalf of Bridge Housing
- Maintain the confidentiality of Bridge Housing and our commercial partners' proprietary and sensitive information
- Not accept gifts or other benefits offered during the course of their duties

If our staff do not adhere to our Statement of Business Ethics, they will be held accountable and may be subject to disciplinary proceedings, including possible loss of employment, as well as criminal and other legal sanctions.

What are our corporate values?

Our corporate values guide our actions and determine who and what we aspire to be. They are expressed through our interaction with our colleagues, clients, suppliers, and the community. We use our corporate values to make decisions that will align with our purpose to build sustainable communities through the provision of affordable housing for low to moderate income earners.

Our values are:	What does Bridge Housing mean by this?
Socially responsible	We are a <i>socially responsible</i> organisation with a commitment to social inclusion and improving the lives of the people and communities we support.
People focused	We are a <i>people focused</i> organisation. We keep our applicants and resident's needs at the core of all activity and decisions, empathise with their needs and deliver our services with fairness, respect and sensitivity. We value and support our employees to enable them to perform at their best and achieve their full potential.
Committed and passionate	We are <i>committed</i> and <i>passionate</i> and put our hearts and minds into our work. We value and encourage innovation and continually seek to improve our performance.
Build relationships	We <i>build relationships</i> based on trust and respect to create positive outcomes for the people and communities we serve.
Professionalism and integrity	We act with <i>professionalism</i> and <i>integrity</i> . We take responsibility for our decision and actions and provide a consistent high quality service. Our decisions are based on sound judgement and our culture engenders good governance, transparency and honesty.

What are our key commercial practices?

We are committed to purchasing goods and services underpinned by the following principles:

- Honesty and fairness
- Accountability and transparency
- No conflict of interest
- Rule of law
- No anti-competitive practices
- No improper advantage
- Intention to proceed (prior to seeking or submitting tenders)
- Co-operation

All communications made or received by Bridge Housing will be treated as confidential, unless otherwise indicated. Bridge Housing keeps records of all commercial transactions to ensure that there is an effective audit trail and a basis upon which to monitor and review the performance of contracts.

Our commercial partners can also expect:

- To be treated with impartiality and fairness
- To receive equal access to information
- To have the same opportunities to submit bids or tenders
- To be subject to probity and audit checks if required
- Have their intellectual property rights respected and to receive fair compensation for any access, license or use of those rights
- To receive fair consideration when providing goods or services to Bridge Housing

What do we expect from our business partners?

We expect our business partners to mirror the ethical standards and practices that we follow. In particular, we expect our partners to:

- Comply with Bridge Housing's procurement policies and procedures in all their dealings with Bridge Housing
- Provide accurate and reliable advice and information
- Declare any conflicts of interest arising in their commercial activities with Bridge Housing
- Not engage in any form of collusive practice, including offering Bridge Housing staff inducements or incentives
- Not disclose confidential information
- Refrain from discussing Bridge Housing business practices or information in the media or other public forums
- Provide fair value for money in supplying Bridge Housing with goods and services
- Co-operate in preventing unethical practices
- Assist Bridge Housing in continuously improving its business practice and relationships

What do we expect of our staff?

In dealing with our business partners, our staff are expected to:

- Promote the integrity of Bridge Housing
- Always act in the interest of Bridge Housing
- Disclose and manage any conflicts of interest
- Not accept or solicit money, gifts, hospitality, benefits or travel
- Treat clients and partners with fairness
- Not engage in any discriminatory or harassing behaviour
- Not disclose any confidential information obtained in the conduct of their work
- Ensure that information is kept securely to prevent unauthorised access
- Obtain approval for any secondary employment outside their duties
- Respect the confidentiality of any information obtained in their employment with Bridge Housing when or if they
 move on to other employment
- Report corrupt conduct

Why is compliance important?

By complying with our Statement of Business Ethics, our business partners will be able to advance their reputation, business objectives and interests in the broader market and community.

Considering that all our business partners must adhere to these ethical standards, there is no disadvantage in complying. However, there are serious disadvantages to non-compliance. In particular, demonstrated corrupt or unethical conduct could lead to the termination of contracts, loss of work in the future, damage to business reputation, public exposure and even criminal prosecution.

Gifts and benefits

Our Gift Policy requires all employees to decline gifts, benefits, travel or hospitality offered during the course of their duties. Our commercial partners should not offer any gifts or benefits to Bridge Housing staff. If a gift is accepted, officials must record the gift in Bridge Housing's Gift Register.

Disclosing and registering conflicts of interest

A conflict of interest exists, or may exist where a person's private affairs (may) impact upon their professional responsibilities. A conflict can be:

• **Actual**, where the conflict already exists – for example, an official has a family relationship with somebody working on a Bridge Housing project.

- **Potential,** where there is no current conflict but one may exist in the future for example, a Bridge Housing staff member has a family relationship with someone who works for a company which may tender for a Bridge Housing contract in the future.
- **Perceived,** where there is no actual conflict but to an outside observer there may appear to be one for example, where an employee has a family relationship with someone who works for a Bridge Housing contractor, but in a role which has no bearing on the contract work being undertaken.

Personal interests need to be carefully managed. Where there is an actual, potential or perceived conflict of interest, it is essential that it be declared and strategies be put in place to manage it, so as to prevent the conflict from having a detrimental effect on any of the parties involved.

We require our staff to disclose any potential or actual conflicts of interest. **This requirement extends to our business partners**. Conflicts of interest must be brought to Bridge Housing's attention as soon as they become known. It is strongly advised that any commercial partner who is aware of a conflict of interest contact Bridge Housing, who will record the conflict in the Conflict of Interest Register, along with details of how the conflict will be managed.

Reporting corrupt conduct

Bridge Housing's Fraud Control Policy defines corrupt conduct to be the conduct of any person that adversely affects the honest or impartial exercise of their functions by any of our staff or authority. It includes the offering or acceptance of bribes and the misuse of Bridge Housing resources. Bridge Housing's Code of Conduct and Ethics requires staff to report any suspected corrupt conduct.

Bridge Housing's Whistle-blower policy provides protection for Bridge Housing staff who report corrupt conduct. We expect our business partners to report any suspected corruption or fraud. Misconduct or breach of the Bridge Housing's Statement of Business Ethics involving a Bridge Housing staff member or any other person working or participating on a Bridge Housing contract, project or undertaking.

Contact

If you wish to provide any information about suspected corrupt conduct, fraud or other misconduct, please contact Bridge Housing's Fraud Control Officer (General Manager of Finance and Corporate Services) directly on 9699-6055 Ext 220. Alternatively if you wish to remain anonymous, Bridge Housing has established a Whistle-blower program which is administered by an independent third party organisation, *Your-Call*.

We have established this program as we are committed to encouraging, supporting and protecting the reporting of incidents of fraud, corrupt conduct and questionable behaviour.

By engaging *Your-Call*, an independent organisation contractors or supplies are able to securely, anonymously and confidentially report information about dishonesty, fraud, unsafe environments, unethical and other inappropriate behaviour.

You can make a secure report online at www.your-call.com.au or alternatively a link to their website is on Bridge Housing's' web site.

This service is monitored 24 hours a day, 7 days a week, 365 days a year. When logging a report please ensure you use the unique company identifier code BRID2009. All reports will be investigated and you are able to monitor progress and receive feedback through *Your Calls* portal.

Translation Service

English

If you need help to understand this letter please contact the Telephone Interpreters Service on 131-450 and ask them to contact on 9699-6055 for you at no cost. You can also come to the Bridge Housing office and ask for assistance in your language.

Simplified Chinese

如果您理解这封信有困难,请拨打电 话传译服务 131450 要求电话传译 服务替您拨打 Bridge Housing,电话 9699-6055。这项服务是免费的。 您也可以到 Bridge Housing 的办公室来. 要求用您的语言来协助您。

Spanish

Si necesita ayuda para entender esta carta, por favor comuníquese con el Servicio Telefónico de Intérpretes al 131450 y solicite que lo contacten sin cargo con Bridge Housing al 9699-6055. También puede dirigirse a las oficinas de Bridge Housing y solicitar asistencia en su idioma.

Russian

Если для понимания содержания этого письма Вам необходима помощь, свяжитесь, пожалуйста, с Телефонной переводческой службой по номеру 131450 и попросите соединить Вас с Bridge Housing по номеру 9699-6055. За соединение платить не нужно. Кроме того, Вы можете лично посетить офис Bridge Housing и попросить об услугах переводчика.

Greek

Εάν χρειάζεστε βοήθεια για να κατανοήσετε την παρούσα επιστολή, παρακαλώ επικοινωνήστε με την Υπηρεσία Τηλεφωνικών Διερμηνέων στο 131-450 και ζητήστε τους να επικοινωνήσουν με το 9699-6055 για εσάς χωρίς καμία χρέωση. Μπορείτε επίσης να επισκεφθείτε το γραφείο Bridge Housing και να ζητήσετε βοήθεια στη γλώσσα σας.

Vietnamese

Nếu cần người giúp để hiểu thư này xin quý vị liên hệ với Dịch Vụ Thông Ngôn Điện Thoại số 131450 và nhờ họ liên lạc với Bridge Housing qua số 9699-6055 cho quý vị một cách miễn phí. Quý vị cũng có thể đến Văn Phòng của Bridge Housing và xin giúp đỡ bằng ngôn-ngữ của quý-vị.