

Statement of Business Ethics

Wentworth Healthcare Ltd

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Introduction

This Statement of Business Ethics sets out the expectations of Wentworth Healthcare Ltd (Wentworth Healthcare) and explains the mutual obligations between goods and service providers, contractors and ourselves.

While carrying out our responsibilities, Wentworth Healthcare values our relationships with many organisations. These dealings include purchasing goods and services, commissioning and contracting out activities, and entering into agreements to undertake activities.

These relationships are founded on a mutual understanding that business will be conducted in an environment of trust, the highest ethical standards, and where laws and regulations are complied with. Individual responsibility and operational excellence are also promoted.

This is essential to ensure that all of our business dealings meet the high public expectations for ethical behaviour and for the protection of funds by mitigation of fraud and corruption.

This statement provides guidance about Wentworth Healthcare's ethical values and what we expect of other organisations when we do business. The ethical standards are not an additional requirement, they are an integral part of sound commercial practice aimed at improving the health and wellbeing of people in our community.

About Us

Wentworth Healthcare, provider of the Nepean Blue Mountains Primary Health Network (NBMPHN), is a not-for profit organisation which works to improve health and wellbeing for the people in the Nepean Blue Mountains region. This includes the Blue Mountains, Hawkesbury, Lithgow and Penrith local government areas (LGAs).



WHL's mission is to empower general practice and other healthcare professionals to deliver high-quality, accessible and integrated primary healthcare that meets the needs of our community.

Our strategic principles are:

- A continuing effective relationship between an individual and their preferred primary care provider.
- A care model that ensures people receive the right care in the right place at the right time and that they are part of their own care outcomes.
- Effective and efficient health services for consumers, particularly those at risk of poor health outcomes.

In 2015, Wentworth Healthcare was selected by the Federal Government to operate the region's Primary Health Network. The key objectives of Primary Health Networks are to:

- increase the efficiency and effectiveness of health services for patients, particularly those at risk of poor health outcomes; and
- improve coordination of care to ensure patients receive the right care in the right place at the right time.

For more information on Wentworth Healthcare and the Nepean Blue Mountains Primary Health Network region visit www.nbmphn.com.au.

Our Values

We expect our commercial partners to work with us in promoting our Core values of Ethical Practice, Respect, Collaboration, Continuous Improvement and Quality and act professionally and morally.

Ethical Practice	<ul style="list-style-type: none"> • We are fair, open, ethical and act with integrity in all our activities • Acting in a manner that is in keeping with the ethical expectations of the community. • Acknowledging our responsibilities and accountabilities. • A commitment to equity as a core driver of our priorities.
Respect	<ul style="list-style-type: none"> • Treat all people with respect, dignity, fairness and equity. • Demonstrate co-operation, trust and support in the workplace. • Practise open two-way communication. • We care for the community and the people we employ
Collaboration	<ul style="list-style-type: none"> • Working together to get the best possible outcomes. • Acknowledge that everyone plays a valuable role. • Promoting community involvement.
Continuous Improvement	<ul style="list-style-type: none"> • We learn from experience to find better ways to do the job. • Support innovation to add value to our business.
Quality	<ul style="list-style-type: none"> • Committed to providing the highest degree of quality in every aspect of our organisation.

Our Code of Conduct

Our workers are expected to abide by our *Code of Conduct*¹.

Why this Statement of Ethics is important to you

By complying with our Statement of Business Ethics, you will be able to advance your business objectives and intents in a fair and ethical manner. As all WHL suppliers of goods and services are required to comply with this Statement, compliance will not disadvantage you in any way.

What we expect of you

We expect all providers to Wentworth Healthcare to observe the following principles when doing business with us:

- Comply with conditions and requirements stated in documentation supplied by Wentworth Healthcare.
- Comply with Wentworth Healthcare policies and procedures as they relate to supply and procurement.
- Comply with the *Privacy Act 1988 (Cth) and associated regulations* in relation to personal information obtained through your dealings with Wentworth Healthcare or work undertaken for Wentworth Healthcare.
- Respect the obligation of Wentworth Healthcare employees to comply with the relevant legislation, codes, policies and procedures as they relate to supply and procurement.
- Provide accurate, timely and reliable advice and information.
- Declare actual, potential or perceived conflicts of interest as soon as you become aware of the conflict that may arise from business dealings with Wentworth Healthcare.
- Not offer bribes, inducements or incentives to Wentworth Healthcare employees.
- Not disclose any confidential information obtained in the course of doing business with Wentworth Healthcare.
- Not disclose Wentworth Healthcare business practice or information in the media or other public forums.
- Refrain from making comments or statements that would lead anyone to believe that you are representing Wentworth Healthcare.
- Cooperate in preventing unethical practices and unprofessional conduct.
- Ensure that all sub-contractors and employees of their company are familiar with the Wentworth Healthcare *Statement of Business Ethics*.
- Comply with all the on-site work health and safety requirements.

¹ Worker is defined as a common law employee employed by Wentworth Healthcare

- Deliver quality and value for money.
- Undertake appropriate record keeping.
- Respect cultural sensitivities when working with our Aboriginal and Torres Strait Islander stakeholders.
- Manage business risks, including those associated with fraud and corruption to the satisfaction of Wentworth Healthcare.
- Treat our employees, agents and officers of Wentworth Healthcare with respect, dignity, fairness and equity.

What you can expect from us

Wentworth Healthcare will ensure that our policies, procedures and practices related to leasing, hiring, tendering, contracting grants, licensing, sponsorships, commercial partnerships or alliances, and the purchase of goods or services are consistent with best practice, and the highest standards of ethical conduct.

- All potential suppliers will be treated with impartiality and fairness and given equal access to information and opportunities to submit bids.
- All procurement activities and decisions will be fully and clearly documented to provide an effective audit trail and to allow for effective performance review of contracts.
- Tenders will not be called unless Wentworth Healthcare has a firm intention to proceed to contract.

Wentworth Healthcare staff are bound by the Company's Code of Conduct and will:

- Maintain and promote Wentworth Healthcare's core values.
- Be accountable and always act in the public interest.
- Use resources in an efficient, effective and prudent way
- Deal fairly, honestly and ethically with all individuals and organisations.
- Manage potential conflicts of interest (whether actual or perceived)
- Disclose any situation that involves or could be perceived as a conflict of interest.
- Not seek to benefit from supplier practices that may be dishonest, unethical or unsafe. Dishonest, unethical or unsafe supplier practices may include tax avoidance, fraud, corruption, exploitation, unmanaged conflicts of interest and modern slavery practices.
- Not solicit money, gifts, hospitality, entertainment or travel from a potential, current or past supplier/business partner for performing official duties.
- Comply with relevant legislation, codes, policies and procedures as they relate to supply and procurement.
- Protect commercial in confidence material and information.
- Respond to reasonable requests for information and advice in a timely manner.
- Report fraud and corruption wherever there is reasonable grounds to suspect it has or is occurring.

Guiding Principles

Value for Money

Value for money does not always mean selecting the lowest price. Wentworth Healthcare will balance all relevant factors including ethical business practice, compliance with specifications, quality, whole-of-life costs (including disposal), reliability and timeliness when selecting suppliers.

Work Health Safety

Wentworth Healthcare is fully committed to the provision of a safe and healthy work environment and we have a moral and legal duty to ensure the health and safety of our workers and to the welfare of our visitors, clients, and contractors.

Open, Fair, Honest

Wentworth Healthcare operates as an open, fair and honest business partner. In this spirit, this *Statement of Business Ethics* set out what you can expect from us, what we expect of you, and the avenues for resolving any issues that may arise.

Conflicts of Interest

All Wentworth Healthcare staff are required to disclose any potential conflicts of interest. You are also expected to advise Wentworth Healthcare of any actual, potential or perceived conflict of interest when you do business with Wentworth Healthcare. This includes procurement, grants, direct negotiations, sponsorships, partnerships, commissioning and third party service provisions, etc.

Confidentiality

Wentworth Healthcare expects each of its suppliers to take all reasonable steps to protect any confidential information received, unless required to disclose it by law.

Contractors

All contractors and subcontractors are required to comply with this *Statement of Business Ethics*. If you engage subcontractors in your work for Wentworth Healthcare, you must make them aware of this *Statement of Business Ethics*.

Intellectual Property Rights

In business relationships with Wentworth Healthcare, parties must respect each other's intellectual property rights and formally negotiate any access, license or use of intellectual property.

Incentives, Gifts and Benefits.

Wentworth Healthcare employees perform their duties without demand or expectation of any gift or benefit. Wentworth Healthcare awards contracts solely in the basis of merit.

In general, Wentworth Healthcare expects its staff to decline gifts, benefits, travel or hospitality offered during the course of their work. You should refrain from offering any such 'incentives' to Wentworth Healthcare staff – all such offers will be formally reported.

As a guide we will consider the following:

- Gifts or gratuities rendered or received during a tender are inappropriate.
- Gifts or gratuities made to gain a business advantage is inappropriate.
- Offers of hospitality or the giving or receiving of token gifts of minimal value (\$75 or less) may be acceptable if:
 - unlikely to be construed as a bribe and are given as sign of appreciation
 - refusing a gift is likely to be perceived as rude or offensive
 - The offer is not targeted at an individual staff member.

If a gift is accepted, the staff member is to declare to an Executive staff member and the gift will be recorded in the Wentworth Healthcare Gift and Benefits Register.

Secondary employment for Wentworth Healthcare employees requires written approval of the CEO.

Interaction with Aboriginal and Torres Strait Islander people

Wentworth Healthcare values the contributions of Aboriginal and Torres Strait Islander people in the management of natural and cultural heritage and respects the culture of Aboriginal people in consultation and decision-making. It is expected that organisations engaged by Wentworth Healthcare will be sensitive to the cultural practices of Aboriginal and Torres Strait Islander staff and the indigenous community.

Equal employment opportunity and diversity

Wentworth Healthcare is committed to equal employment opportunity and is active in engaging a diverse workforce which is free of discrimination and reflective of the local community.

Compliance

Based on the company's Risk Appetite Statement, Wentworth Healthcare has little or no risk appetite when it comes to meeting its compliance obligations. Therefore, compliance with the Statement of Business Ethics is mandatory and there may be consequences for non-compliance.

Demonstrated corrupt or unethical behaviour may lead to termination of contracts, loss of future work, loss of reputation, investigation for corruption and referral for criminal investigation wherever necessary.

Reporting fraud and corrupt conduct

Wentworth Healthcare has zero tolerance for fraud and corrupt conduct. The Wentworth Healthcare *Fraud Control Policy* and the WHL *Fraud & Corruption Control Plan* set our commitment to reduce and manage the incidence of fraud and corrupt conduct through prevention, detect and responding to corruption.

Any person who suspects or becomes aware of any fraudulent activity must immediately or as soon as practicable report the details to either the Wentworth Healthcare Chief Executive Officer or the Chair of the Wentworth Healthcare Board.

Who to Contact

Questions about this Statement of Business Ethics or WHL Procurement Process? Please call 4708 8100 and ask to speak to the Executive Manager – Business Services, or email compliance@nbmphn.com.au