

Document reference:	ACC Code of Conduct
Date Developed:	March 2026
Date Reviewed:	March 2030 (due)

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PURPOSE

The purpose of this Code of Conduct is to assist Anchor ChildCare (ACC) Team members (Employees and Contractors) to properly discharge their roles and responsibilities in order to meet legislative requirements and to strive for the highest standards of business and ethical conduct.

The Anchor ChildCare Code of Conduct will also assist Employees and Contractors to understand the expectations around personal behaviour and communication.

This Anchor ChildCare Code of Conduct applies to all Anchor ChildCare team members. Anchor ChildCare is a subsidiary of Anchor Impact Group, providing specialist advisory services to the

early childhood education and care sector, including strategy and governance advisory, complex business and finance advisory, and risk advisory and compliance turnaround services.

Duties are predominantly derived from position descriptions, contractor agreements or client assignments, accordingly:

1. All ACC Team members must act honestly, in good faith and in the best interest of Anchor ChildCare as a whole.
2. All ACC Team members have a duty to use due care and diligence in fulfilling the commitment to client assignments.
3. All ACC Team members must comply with the accountabilities assigned to their respective roles.
4. All ACC Team members must not make improper use of information acquired as an ACC Team employee or contractor.
5. All ACC Team members must not accept financial inducements or gifts outside of contractual terms.
6. All ACC Team members must not take improper advantage of the position as an ACC Team employee or contractor.
7. All ACC Team members must treat information about clients, their organisations and the children and families they serve with complete confidentiality and comply with the ACC Privacy Policy.
8. All ACC Team members must not allow personal interests, or the interests of any associated person, to conflict with the interests of Anchor ChildCare or Anchor ChildCare clients.
9. All ACC Team members have an obligation to be independent in judgment and actions and to take all reasonable steps to discharge client assignments per their documented intentions.
10. All ACC Team members, when on site and in virtual meetings with clients, must present in business style dress. Wearing of the Anchor ChildCare name badge and verification where needed for flu vaccination, covid vaccination, Working with Children check or police check records.

11. Confidential information received as an ACC Team member in the course of the exercise of ACC Team member duties remains the property of Anchor ChildCare and it is improper to disclose it, or allow it to be disclosed, unless that disclosure has been authorised by Anchor ChildCare, or the person from whom the information is provided, or is required by law.
12. All ACC Team members should not engage in conduct likely to bring discredit upon Anchor ChildCare or the Anchor Impact Group.
13. All ACC Team members have an obligation, at all times, to comply with the spirit, as well as the letter of the law and with the principles of this Code. This includes compliance with the Education and Care Services National Law, National Regulations, and the National Quality Framework (NQF).
14. All ACC Team members have an obligation to align their behaviours against the Anchor ChildCare values:
 - a. **Authentic** - we are genuine and always reflect our true selves
 - b. **Nimble** - we move quickly to meet our clients' needs
 - c. **Collaborative** - we work collaboratively with our clients and stakeholders
 - d. **Honest** - we are sincere and truthful in all that we do
 - e. **Outcomes** - we focus forward and towards the achievement of goals and objectives
 - f. **Responsive** - we are there for our clients when they need us.

GUIDELINES FOR THE INTERPRETATION OF PRINCIPLES

The following Guidelines are intended to assist Anchor ChildCare team members in complying with the core principles of the Code. They are not meant to be exhaustive and may be added over time to address issues of importance as they arise.

DUTIES TO ANCHOR CHILDCARE

1. Each ACC Team member should endeavour to ensure that the tasks in the accountability matrix are properly understood and are competently discharged in the interests of Anchor ChildCare.
2. All ACC Team members should endeavour to ensure that assigned tasks or deliverables are completed to the best of their abilities.

3. In evaluating the interests of Anchor ChildCare, all ACC Team members should consider the interests of Anchor ChildCare as a whole, but where appropriate and/or required by law should consider the interests of others.
4. Each ACC Team member should endeavour to ensure that Anchor ChildCare is financially viable, properly managed and constantly improved so as to protect and enhance the interests of Anchor ChildCare.
5. Where conflict or issues arise that could affect the reputation or execution of client assignments, all ACC Team members will communicate or escalate these matters in Team meetings or directly to the COO or CEO.

DUTIES TO CLIENTS

1. ACC Practice Leads are accountable for ensuring that client work plans arising from client agreements are delivered. We are obliged to serve in the best interests of the client. If barriers arise with clients, then ACC Practice Leads must document a risk escalation report to the client. Unresolved escalations must be escalated to the CEO for further action.
2. All ACC Team members must escalate and report client feedback, especially complaints, and draw these to the attention of the COO or CEO for action and resolution.
3. When we are engaged to provide advisory services to childcare providers, including those with regulatory compliance concerns, we are obliged to act with the highest standards of professional conduct and to prioritise the safety and well-being of children in all advisory work. We must comply with all mandatory reporting obligations under applicable state and territory legislation.

DUE DILIGENCE

6. All ACC Team members should attend all Anchor ChildCare meetings but where attendance at meetings is not possible, appropriate steps should be taken to record key actions and decisions.
7. All ACC Team members must acquire knowledge about the business of Anchor ChildCare, the statutory and regulatory requirements affecting Employees or Contractors in the discharge of their duties to Anchor ChildCare, including the Education and Care Services National Law, National Regulations, and National Quality Standard, and be aware of the physical, political and social environment in which it operates.
8. All ACC Team members should endeavour to ensure that systems are established within Anchor ChildCare to provide the CEO, on a regular and timely basis, with necessary data to enable them to make a reasoned judgment and so discharge their duties of care and

diligence. An internal audit of systems supporting Anchor ChildCare should be conducted regularly.

9. All ACC Team members should endeavour to ensure that relations between Anchor ChildCare and the external accountant and book-keeper are open, unimpeded and constructive.
10. All ACC Team members shall endeavour to ensure Anchor ChildCare complies with the law and strives for the highest standards of business and ethical conduct.

USE OF INFORMATION

11. All ACC Team members must not make improper use of information acquired by virtue of the position as an ACC Team member. This prohibition applies irrespective of whether the ACC Team member would gain directly or indirectly a personal advantage or an advantage for any associated person or might cause detriment to Anchor ChildCare.
12. Matters such as trade secrets, processes, methods, advertising or promotional programs, sales and statistics affecting financial results are particularly sensitive and must not be disclosed.
13. All ACC Team members must handle any personal information relating to children, families and educators accessed during advisory engagements with the utmost care and in strict accordance with the ACC Privacy Policy and applicable legislation.

PROFESSIONAL INTEGRITY

The Anchor ChildCare Managing Director is responsible for establishing a system for identifying, disclosing and managing conflicts of interest across Anchor ChildCare and monitoring compliance with this Code.

Each person this code applies to is responsible for complying with those systems and standards.

BREACHES OF THE CODE OF CONDUCT

If an Anchor ChildCare team member has reason to believe that a person subject to this Code of Conduct has failed to comply with it, the CEO will investigate the circumstances. The ACC Team member will be stood down, pending investigation, due to allegations that the individual employee or contractor's conduct has been detrimental to the interests of Anchor ChildCare.

All reports of breaches by an ACC Team member should be reported to the CEO in the first instance. Outcomes from investigations are not subject to review. The CEO's decisions are final.

REVIEW PROCESS

This Code of Conduct will be reviewed at least every five (5) years or as needed to ensure that the Code of Conduct is operating effectively.

RELATED DOCUMENTS

- Anchor ChildCare Accountability Matrix
- Employment or Contractor Agreements
- Anchor ChildCare Strategy - Vision, Purpose and Values
- Anchor ChildCare Privacy Policy

REVISION RECORD

Date Issued	Details of changes
March 2026	First issue