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PURPOSE

The purpose of this Code of Conduct is to assist Anchor Impact Group (AIG) 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 Impact Group Code of Conduct will also assist Employees and Contractors to understand the expectations around personal behaviour and communication.

This Anchor Impact Group Code of Conduct applies to all Anchor Impact Group team members across all subsidiary entities, including Anchor Excellence, Anchor Childcare, Impactful Leaders, and SAGE Study Tours.

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

1. All AIG Team members must act honestly, in good faith and in the best interest of Anchor Impact Group as a whole.
2. All AIG Team members have a duty to use due care and diligence in fulfilling the commitment of client assignments.
3. All AIG Team members must comply with the accountabilities assigned to their respective roles.
4. All AIG Team members must not make improper use of information acquired as an AIG Team employee or contractor.
5. All AIG Team members must not accept financial inducement or gifts outside of contractual terms.
6. All AIG Team members must not take improper advantage of the position as an AIG Team employee or contractor.
7. All AIG Team members must treat information about clients and their customers with complete confidentiality and comply with the AIG Privacy Policy.
8. All AIG Team members must not allow personal interests, or the interests of any associated person, to conflict with the interests of Anchor Impact Group or Anchor Impact Group clients.
9. All AIG 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 AIG Team members, when on site and in virtual meetings with clients, must present in business style dress. Wearing of the relevant Anchor brand name badge and verification where needed for flu vaccination, covid vaccination or police check records.
11. Confidential information received as an AIG Team member in the course of the exercise of AIG Team member duties remains the property of Anchor Impact Group and it is improper to disclose it, or allow it to be disclosed, unless that disclosure has been authorised by Anchor Impact Group, or the person from whom the information is provided, or is required by law.

12. All AIG Team members should not engage in conduct likely to bring discredit upon Anchor Impact Group or any of its subsidiary entities.
13. All AIG 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.
14. All AIG Team members have an obligation to align behaviours against the Anchor Impact Group 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 forwards and towards 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 Impact Group 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 IMPACT GROUP

1. Each AIG 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 Impact Group.
2. All AIG 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 Impact Group, all AIG Team members should consider the interests of Anchor Impact Group as a whole, but where appropriate and/or required by law should consider the interests of others.

4. Each AIG Team member should endeavour to ensure that Anchor Impact Group is financially viable, properly managed and constantly improved so as to protect and enhance the interests of Anchor Impact Group.
5. Where conflict or issues arise that could affect the reputation or execution of client assignments, all AIG Team members will communicate or escalate these matters in Team meetings or directly to the COO or CEO.

DUTIES TO CLIENTS

1. AIG Leads are accountable to ensure 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 AIG Leads must document a risk escalation report to the client. Unresolved escalations must be escalated to the CEO for further action.
2. All AIG 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 assigned to work as appointed advisers for organisations, we are obliged to meet all key personnel requirements and work to address the primary needs of our clients' stakeholders and service recipients.

DUE DILIGENCE

6. All AIG Team members should attend all Anchor Impact Group meetings but where attendance at meetings is not possible, appropriate steps should be taken to record key actions and decisions.
7. All AIG Team members must acquire knowledge about the business of Anchor Impact Group, the statutory and regulatory requirements affecting Employees or Contractors in the discharge of their duties to Anchor Impact Group, and be aware of the physical, political and social environment in which it operates.
8. All AIG Team members should endeavour to ensure that systems are established within Anchor Impact Group 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 Impact Group should be conducted regularly.
9. All AIG Team members should endeavour to ensure that relations between Anchor Impact Group and the external accountant and book-keeper are open, unimpeded and constructive.

10. All AIG Team members shall endeavour to ensure Anchor Impact Group complies with the law and strives for the highest standards of business and ethical conduct.

USE OF INFORMATION

11. All AIG Team members must not make improper use of information acquired by virtue of the position as an AIG Team member. This prohibition applies irrespective of whether the AIG Team member would gain directly or indirectly a personal advantage or an advantage for any associated person or might cause detriment to Anchor Impact Group.
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.

PROFESSIONAL INTEGRITY

The Anchor Impact Group CEO is responsible for establishing a system for identifying, disclosing and managing conflicts of interest across Anchor Impact Group 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 Impact Group 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 AIG Team member will be stood down, pending investigation, due to allegations that individual employee or contractor's conduct has been detrimental to the interests of Anchor Impact Group.

All reports of breaches by an AIG 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 Impact Group Accountability Matrix
- Employment or Contractor Agreements
- Anchor Impact Group Strategy - Vision, Purpose and Values
- Anchor Impact Group Privacy Policy

REVISION RECORD

Date Issued	Details of changes
March 2025	First issue