



Document reference:	SAGE Study Tours Code of Conduct
Date Developed:	March 2026
Date Reviewed:	March 2030 (due)

PURPOSE..... 1

PART A – TEAM MEMBERS (EMPLOYEES AND CONTRACTORS)..... 2

 GUIDELINES FOR THE INTERPRETATION OF PRINCIPLES.....3

 DUTIES TO SAGE STUDY TOURS.....3

 DUTIES TO TOUR PARTICIPANTS AND HOST ORGANISATIONS..... 4

 DUE DILIGENCE.....4

 USE OF INFORMATION..... 5

 PROFESSIONAL INTEGRITY.....5

PART B – TOUR PARTICIPANTS (DELEGATES)..... 5

 BREACHES BY TOUR PARTICIPANTS..... 7

BREACHES OF THE CODE OF CONDUCT (TEAM MEMBERS).....7

REVIEW PROCESS..... 7

RELATED DOCUMENTS.....7

REVISION RECORD.....8

PURPOSE

The purpose of this Code of Conduct is to assist SAGE Study Tours (SAGE) Team members (Employees and Contractors) and Tour Participants (Delegates) 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 SAGE Study Tours Code of Conduct will also assist Employees, Contractors and Delegates to understand the expectations around personal behaviour and communication, both in Australia and while travelling internationally.

This SAGE Study Tours Code of Conduct applies to all SAGE Study Tours team members and tour participants. SAGE Study Tours is operated by Ozability Pty Ltd (ABN 51 161 471 496) trading as SAGE Tours, a brand under the Anchor Impact Group Pty Ltd.

PART A — TEAM MEMBERS (EMPLOYEES AND CONTRACTORS)

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

1. All SAGE Team members must act honestly, in good faith and in the best interest of SAGE Study Tours as a whole.
2. All SAGE Team members have a duty to use due care and diligence in fulfilling the commitment of tour planning, coordination and delivery.
3. All SAGE Team members must comply with the accountabilities assigned to their respective roles.
4. All SAGE Team members must not make improper use of information acquired as a SAGE Team employee or contractor.
5. All SAGE Team members must not accept financial inducements or gifts outside of contractual terms.
6. All SAGE Team members must not take improper advantage of the position as a SAGE Team employee or contractor.
7. All SAGE Team members must treat information about tour participants, host organisations and their stakeholders with complete confidentiality and comply with the SAGE Privacy Policy.
8. All SAGE Team members must not allow personal interests, or the interests of any associated person, to conflict with the interests of SAGE Study Tours or SAGE Study Tours clients and delegates.
9. All SAGE Team members have an obligation to be independent in judgment and actions and to take all reasonable steps to discharge their duties per their documented intentions.

10. All SAGE Team members, when on site, at host organisations and in meetings with partners, must present in business style dress. Wearing of the SAGE Study Tours name badge and verification where needed for vaccination records or police check records.
11. Confidential information received as a SAGE Team member in the course of the exercise of SAGE Team member duties remains the property of SAGE Study Tours, and it is improper to disclose it, or allow it to be disclosed, unless that disclosure has been authorised by SAGE Study Tours, or the person from whom the information is provided, or is required by law.
12. All SAGE Team members should not engage in conduct likely to bring discredit upon SAGE Study Tours or the Anchor Impact Group.
13. All SAGE 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 SAGE 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 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 the SAGE Study Tours 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 SAGE STUDY TOURS

1. Each SAGE Team member should endeavour to ensure that the tasks in the accountability matrix are properly understood and are competently discharged in the interests of SAGE Study Tours.

2. All SAGE 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 SAGE Study Tours, all SAGE Team members should consider the interests of SAGE Study Tours as a whole, but where appropriate and/or required by law, should consider the interests of others.
4. Each SAGE Team member should endeavour to ensure that SAGE Study Tours is financially viable, properly managed and constantly improved so as to protect and enhance the interests of SAGE Study Tours.
5. Where conflict or issues arise that could affect the reputation or execution of tour programs, all SAGE Team members will communicate or escalate these matters in Team meetings or directly to the Tour Director or CEO.

DUTIES TO TOUR PARTICIPANTS AND HOST ORGANISATIONS

1. SAGE Tour Leaders are accountable for ensuring that tour itineraries and programs arising from participant registrations are delivered. We are obliged to serve in the best interests of the delegates. If barriers arise, SAGE Tour Leaders must document a risk escalation report. Unresolved escalations must be escalated to the CEO for further action.
2. All SAGE Team members must escalate and report participant feedback, especially complaints, and draw these to the attention of the Tour Director or CEO for action and resolution.
3. All SAGE Team members must ensure the safety, comfort and well-being of tour participants at all times during international travel, including compliance with local laws, customs and health and safety requirements in each destination country.
4. All SAGE Team members must treat host organisations, their staff and service recipients with the utmost respect and professionalism, recognising the privilege of being granted access to their facilities and programs.

DUE DILIGENCE

6. All SAGE Team members should attend all SAGE Study Tours meetings, but where attendance at meetings is not possible, appropriate steps should be taken to record key actions and decisions.
7. All SAGE Team members must acquire knowledge about the business of SAGE Study Tours, the statutory and regulatory requirements affecting Employees or Contractors in the discharge of their duties, including international travel regulations, Australian Consumer Law (Schedule 2 of the Competition and Consumer Act 2010), duty of care obligations, and

be aware of the physical, political and social environment in the countries they operate in. Team members should also be familiar with the SAGE Tours Conditions of Travel and the terms and conditions of key third-party suppliers, including Business First Travel (SAGE Tours' designated booking and travel agent).

8. All SAGE Team members should endeavour to ensure that systems are established within SAGE Study Tours to provide the CEO, on a regular and timely basis, with the 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 SAGE Study Tours should be conducted regularly.
9. All SAGE Team members should endeavour to ensure that relations between SAGE Study Tours and the external accountant and bookkeeper are open, unimpeded and constructive.
10. All SAGE Team members shall endeavour to ensure SAGE Study Tours complies with the law and strives for the highest standards of business and ethical conduct.

USE OF INFORMATION

11. All SAGE Team members must not make improper use of information acquired by virtue of their position as a SAGE Team member. This prohibition applies irrespective of whether the SAGE Team member would gain directly or indirectly a personal advantage or an advantage for any associated person, or might cause detriment to SAGE Study Tours.
12. Matters such as trade secrets, tour itineraries, host organisation contacts, participant lists, pricing strategies and statistics affecting financial results are particularly sensitive and must not be disclosed.
13. All SAGE Team members must handle passport details, health information and other sensitive personal data of tour participants with the utmost care and in strict accordance with the SAGE Privacy Policy and applicable legislation.

PROFESSIONAL INTEGRITY

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

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

PART B — TOUR PARTICIPANTS (DELEGATES)

SAGE Study Tours expects all tour participants to conduct themselves in a manner consistent with the following principles while participating in a SAGE Study Tour:

1. **Respect and Professionalism** – Delegates must treat all fellow participants, SAGE Study Tours team members, host organisations, their staff and service recipients with courtesy, dignity and respect at all times.
2. **Cultural Sensitivity** – Delegates must be respectful of the cultural norms, customs, traditions and laws of host countries. This includes appropriate dress, behaviour and communication when visiting aged care facilities, retirement living communities, educational institutions and government organisations.
3. **Compliance with Laws** – Delegates must comply with the laws of Australia and all destination countries visited during the tour. Any illegal activity will result in immediate removal from the tour program.
4. **Health and Safety** – Delegates must disclose any pre-existing medical conditions, mobility limitations or dietary requirements that may affect their ability to attend a SAGE Tour (Conditions of Travel, clause 2(c)). Delegates must advise their SAGE representative of any special requirements (e.g. special meals, medical requirements) at the time of Booking (Conditions of Travel, clause 3(d)). Delegates must follow all health and safety instructions provided by SAGE Study Tours team members and host organisations.
5. **Confidentiality** – Delegates must treat all information obtained during site visits, presentations and meetings as confidential unless expressly authorised for public disclosure by the host organisation. This includes information relating to residents, clients, patients, staff and operational matters of host organisations.
6. **Photography and Recording** – Delegates must obtain permission before photographing or recording at host sites. Under no circumstances should delegates photograph or record residents, clients or patients of host organisations without explicit consent from both the host organisation and the individuals concerned.
7. **Alcohol and Substance Use** – Delegates must not attend site visits, presentations or formal tour activities while under the influence of alcohol or other substances. Responsible consumption of alcohol at social events and dinners is acceptable.
8. **Punctuality** – Delegates must adhere to the published tour itinerary and be punctual for all scheduled activities, transfers and departures. Late arrivals may result in missed activities, and SAGE Study Tours is not responsible for any costs arising from a delegate's failure to be punctual.
9. **Communication** – Delegates must communicate any concerns, complaints or issues to the SAGE Tour Leader promptly so that they may be addressed during the tour.

10. Conditions of Travel – Delegates must read, understand and comply with the SAGE Study Tours Conditions of Travel, which form part of the terms and conditions of their tour registration. Key participant obligations under the Conditions of Travel include:

- It is a condition of Booking that each individual takes out personal travel insurance (clause 8)
- Delegates are responsible for ensuring they have a valid passport (with at least 6 months validity from date of entry), visas, entry permits and any vaccination or medical permits required by each destination country (clause 10)
- Delegates are responsible for booking and paying for their own flights unless otherwise included in the tour package (clause 10(b))
- For travel advice, delegates should contact the Department of Foreign Affairs and Trade or visit www.smartraveller.gov.au (clause 10(e))
- Changes to the tour program may be required due to unforeseen or local circumstances, and delegates acknowledge SAGE's right to make such adjustments (clauses 3(f) and 3(g))

BREACHES BY TOUR PARTICIPANTS

SAGE Study Tours reserves the right to exclude a participant from tour activities or terminate their participation in the tour if their conduct is deemed to be in breach of this Code, dangerous to themselves or others, disruptive to the tour program, or in breach of the laws of any destination country. In such circumstances, SAGE Study Tours is not liable for any costs, losses or expenses incurred by the participant. In accordance with the Conditions of Travel (clause 9), participants indemnify SAGE and its personnel from and against all claims, loss, damage, cost or expense arising from any act or omission of the participant in connection with the tour.

BREACHES OF THE CODE OF CONDUCT (TEAM MEMBERS)

If a SAGE Study Tours 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 SAGE 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 SAGE Study Tours.

All reports of breaches by a SAGE 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

- SAGE Study Tours Conditions of Travel
- SAGE Study Tours Accountability Matrix
- Employment or Contractor Agreements
- Anchor Impact Group Strategy - Vision, Purpose and Values
- SAGE Study Tours Privacy Policy

REVISION RECORD

Date Issued	Details of changes
March 2026	First issue