

# Code of Conduct

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## A message from our CEO



*At IDP the commitment and dedication of each of us contributes to helping people change their lives through the power of education. Whether we are supporting people to achieve their study, migration or work goals, our impact is powerful.*



You have the support of your Global Leadership Team and senior leaders by your side. We are a community that works together, so please be assured you can raise all issues and questions with us, regardless of the size and nature.

I encourage you to read through these pages and understand the important role you play in strengthening the trust and human connection we have with each other and our communities.

Thank you for your role in creating a safe, fair, inclusive, and welcoming environment.

To be part of IDP is truly an honour and a responsibility. We can all be very proud of this.

Kind regards

**Tennealle O'Shannessy**

Chief Executive Officer  
**IDP Education Limited**



Hi everyone,

As you know, we are part of a special organisation.

By providing access to global education, language learning and language testing, our teams help people achieve their big, ambitious, life-changing goals.

These goals not only help our individual customers, but they assist their families and wider communities to thrive as well.

While there may be other organisations who aspire to deliver what we do, what sets IDP apart is our focus on trust and human connection.

Indeed, it is that trust and human connection that underpins our Code of Conduct.

Outlined over the following pages are our values, our objectives and the standards we hold ourselves accountable to.

Our Values - Integrity, Expertise, Quality, Caring and Community - unite us together as a global team. They provide a compass for us all to guide decisions that impact our customers, our people, our communities and our organisation.

Also outlined in these pages is where you can go for support. Please know that you are never alone.

# Our Values

As the global leader in international education, we have focused on building trusted, human relationships for more than 50 years. We are driven by our values of **Integrity, Caring, Community, Expertise and Quality**.

Our values underpin the way we do things at IDP and shape the way we engage with all customers, teams, and stakeholders.

Regardless of the position you work in, you are part of our community. Your expertise, integrity and the quality of the work you deliver impact the outstanding service we provide our customers. It's the care we take of each other and our customers that makes IDP stand out as a leader in our industry.

## INTEGRITY

Integrity is at the heart of what we do. We act with honesty and integrity in all our operations both inside and outside our business

## CARING

IDP treats all people with respect and celebrates their success. By fostering a fulfilling and safe place to work and recognising good performance and providing opportunities for advancement, we continuously demonstrate our people-focused nature.

## COMMUNITY

With teams in more than 50 countries, IDP has always sought to improve the lives of people around the world. We are proud to contribute to the growth and prosperity of the communities we operate in by conducting our work in ethical and sustainable ways, empowering the next generation of leaders along the way.

## EXPERTISE

We are experts in our field. We are commercially astute and ensure our resources, knowledge and skills are optimised and shared between our teams, countries and regions.

## QUALITY

We are high performers. We provide the best results for our students, IELTS test takers, institution clients, stakeholders and the communities in which we operate. With innovation at the core of what we do, we find creative solutions to our customer's problems.

## Our Objectives

Our business success comes from:

- Providing exceptional experiences for our students, test takers, clients and partners by offering services on a competitive and professional basis
- Creating and fostering work environments where great performance is recognised, opportunities for career growth are available and our people feel respected, included and fulfilled
- Contributing to the growth and prosperity of the communities we operate within by creating opportunities and running our business in an efficient and sustainable manner. Seeking opportunities for growth that will generate and sustain shareholder value
- Responding to the reasonable and legitimate expectations of stakeholders and of the communities in which we operate
- Always acting with honesty and integrity in dealings both inside and outside our business



# Our Code of Conduct

## What is the Code of Conduct ('Code')

Our Code sets out our commitment to how we operate and the basic principles to guide each of us in the way we conduct business on behalf of IDP. This simply means that we always act ethically and with integrity, in line with our values, legal requirements and with our policies and procedures.

The Code also identifies the ways we contribute to a positive, professional and productive workplace and to the broader success of the business.

## Who must follow the Code?

The Code applies to everyone who conducts business on behalf of IDP. This includes all team members, our Board of Directors ('Board'), all officers of IDP and its subsidiaries, as well as those engaged in any representative capacity.

The Code applies in any situation where there is a connection with your work and/or where your behaviour impacts, or has the potential to impact, IDP.

The Board and senior management are committed to upholding the principles outlined in the Code and take compliance with the Code very seriously. It's important to remember that any non-compliance may lead to disciplinary action, up to and including dismissal.

## The Code and the Law

Our teams work all around the world and are subject to the laws of different countries. Each of us is expected to comply with our Code in conjunction with any other codes (i.e., IELTS Code of Practice) Where there is a discrepancy, this Code takes priority over any other Code.

If you find that the Code or any of our policies or procedures conflict with local law, always follow the law and discuss any potential conflict with your Supervisor or Manager or another appropriate person.

## Renewing the Code

The Code reflects IDP's evolving business and will be updated as required with signoff from the Board. Our people are expected to stay up to date with the contents of the Code and their responsibilities.

## What is expected of me?

We expect all our people to:

- Comply with the Code, IDP's Policies and Procedures and the law no matter where you are in the world
- Handle all business dealings with honesty, integrity and fairness
- Not use IDP's data, resources, assets, relationships or information for personal gain
- Protect IDP's confidential information at all times
- Respect the rights of all team members to fair treatment and equal opportunity and a workplace free from harassment of any form
- Use good judgment and act in a professional and ethical manner at all times
- Take responsibility for your actions and ask for guidance where needed
- Respect and include everyone, embracing our differences including diversity of thought, religion, culture, ethnicity, ability, gender and age
- Follow lawful and reasonable management directions
- Take appropriate action where conduct is observed that breaches the Code



# Our Code of Conduct

## Making Decisions

If you are unsure what is the 'right thing' to do in a particular situation, always ask yourself:

1. "Would I feel uncomfortable describing what I am about to do at a team meeting? To my family? To the media?"
2. "Will this action negatively impact other people such as other team members, investors or customers?"
3. "By doing this will I, my colleagues, or the company be subject to legal fines or criminal charges?"
4. "Will my actions cause reputational, financial loss or brand damage to IDP?"
5. "Is it outside my authority to do this?"

If you answer "yes" to any of these questions - then talk to your Supervisor or Manager before you take any action.

## Our Supervisors and Managers

Our Supervisors and Managers have the added responsibility of creating a caring, inclusive, equitable, open and supportive environment where team members feel comfortable being themselves, asking questions and raising concerns.

Ethical behaviour does not simply happen. It's the product of a strong culture and clear communication of expected behaviours, modelled from the top and demonstrated by example.

As a leader, we expect you to:

- Ensure the people that you lead understand their responsibilities under the Code as well as other company policies and procedures
- Discuss the Code and reinforce the importance of ethics and compliance with your team
- Create an environment where people feel comfortable being themselves and raising concerns and questions
- Consider your team's conduct relating to the Code, our values and other company policies and procedures when evaluating performance
- Never encourage or direct team members to achieve business results at the expense of ethical conduct or compliance with the Code or the law
- Always act to stop violations of the Code or the law by others, including team members that you lead

Where there is a question or a concern related to the Code we expect our leaders to listen carefully, ask questions, make sure they fully understand and provide ethical advice.



# Concerned about an Issue?

IDP is committed to ensuring that you can raise concerns in good faith without fear of reprisal and information provided will be kept confidential and secure.

## How do I Raise a Concern?

It can sometimes be uncomfortable to raise concerns around possible misconduct. It requires courage and integrity. While the Code outlines some situations you could face, it cannot cover everything.

Listed below are some general ideas on how to discuss concerns with your Supervisor or Manager.

1. Schedule a specific time with your Supervisor or Manager to discuss your concern
2. Outline the detail of your concern and discuss it calmly and professionally
3. Highlight the risks you see to the company and the potential impact of the particular situation
4. Acknowledge (when appropriate) that you may not have all of the information or facts relevant to the issue
5. State any concerns that you may have about the confidentiality of the situation you are raising (if you are concern about confidentiality, be careful when sharing information with others who might discuss the situation or information)
6. Thank your Supervisor or Manager for their attention to the issue

## How do I Respond to a Concern?

Your reaction as a leader is extremely important when people bring a concern to you. It either encourages an open environment where our people feel safe to raise and discuss important issues or it can have a chilling effect on future communications and workplace morale.

Below are some general ideas on how to respond when a team member raises a concern.

1. Ensure you have enough time to discuss their concern. If not, schedule another meeting and tell the team member that you are doing so to ensure that they and their issue have your full attention
2. Listen as much as possible. Remain calm and professional; try to avoid a defensive response or attempting to cut off the discussion
3. Ask for clarification and additional information, but do so in a way that the team member does not feel intimidated or defensive
4. Do not feel that you must give an immediate response. Many times it is better to reflect on the team member's concerns and respond later with your thoughts on the issue
5. Thank the team member for bringing the issue to your attention. Bear in mind that many team members may be particularly sensitive to perceived slights or perceived retaliation following reporting a concern



### Important!

Where you wish to raise an issue or concern directly with IDP's global leadership team please email [yourvoice@idp.com](mailto:yourvoice@idp.com) or you can contact the Chief People Officer directly.



Please remember IDP will not usually respond to anonymous emails unless it is under IDP's [Whistleblower Policy](#).

# Concerned about an Issue?

## Once an Issue has been raised

Team members who raise concerns help us to resolve situations before they grow into larger issues. For this reason, we encourage our people to raise issues.

As an organisation we expect people who raise an issue to be treated in a courteous and respectful manner. We do not tolerate retaliation or victimisation against anyone who raises a question

around our business practices in 'good faith'. This simply means that as a team member you have made a genuine attempt to provide honest and accurate information, even if later it is proven there is no wrongdoing.

If you or others have been retaliated against or victimised, please speak to your Supervisor, Manager, or your Country or Regional Director.

## Whistleblower Protection Policy

The Whistleblower Protection Policy encourages and promotes honest and ethical behaviour by providing a clear process for you to escalate concerns about actual, suspected or anticipated wrongdoing within IDP. The Whistleblower Policy provides a mechanism that allows all team members and contractors are able to report instances, or suspected instances, of unethical, improper, unlawful or undesirable conduct without fear of intimidation or reprisal.



# Our Leaders

IDP has over 7,400 team members located in more than 30 countries. We place a great deal of trust in our people to lead our business around the world and we rely on them to do this in line with the principles, values, behaviours and standards that are important to us.

Our values come alive in our business through our people who, no matter what role they perform, are:

- **People focused**, leading boldly with care and understanding IDP's role in helping people to achieve their dreams and aspirations
- **Fair** and treat people with **respect**, valuing everyone's contribution, celebrating individual and team success
- **Experts** in our field and **commercially astute**
- **Collaborative**, agile and work together to get the best outcome for IDP, ensuring resources, knowledge and skill are shared between teams, countries and regions
- **Ethical** with great personal **integrity**
- **High performers** driven to deliver **quality** work and hit targets
- **Outcome-focused**, with a passion for always delivering the best result for our customers, stakeholders, IDP and building sustainable futures

Our leaders are working towards  
**building a better tomorrow** by creating **sustainable**  
**futures** in the communities where we operate



# Our Work Environment

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Our people are what makes our workplaces warm and welcoming for everyone. We strive to provide environments where each of us can excel, be creative, seek new ways to solve problems, take initiative, generate opportunities, be accountable for our actions and importantly, support others to achieve their full potential.

We encourage global teamwork to leverage our peoples' diverse talents and expertise through effective collaboration and cooperation.

Each of us play a role in creating this environment of trust and respect and for promoting a productive work environment by:

- Treating our colleagues, students, test takers, clients and others we do business with, with care, respect, dignity, fairness and courtesy
- Encouraging open, timely communications that help us achieve IDP's vision and business goals, share information, increase understanding, and where possible participate in the decision-making process
- Sharing our pride in IDP and its achievements, as well as providing recognition for our work-related successes
- Offering and receiving feedback constructively, being receptive to the ideas and concerns of others
- Using all company resources such as the internet, phones, laptops or email appropriately as set out in the Acceptable Use of Electronic Facilities Policy
- Taking responsibility for our own wellbeing and maintaining a safe and healthy workplace to ensure the best care for all our people and customers, as well as the general public
- Recruiting, selecting, promoting, training and paying based on merit, experience and other performance related criteria
- Taking pride in the diversity of our workforce, viewing it as a competitive advantage that is to be nurtured and expanded. Valuing and enhancing the skills and experience each team member brings to our team
- Not allowing illegal drugs to enter the workplace. The use of illegal drugs creates serious health and safety risks at in the workplace. The possession, distribution, sale, purchase or use of illegal drugs or being under the influence of such drugs when representing IDP, or on company time, property, or at company events is prohibited whether these take place outside or inside the workplace. IDP prohibits the consumption of alcohol where this affects our work performance or the work environment of the company
- Protecting our environment by understanding any environmental impact of our decisions and promoting sustainable practices



# Our Work Environment

## Respecting and Including Each Other

IDP is committed to providing a safe, respectful and productive environment for all team members free from discrimination, bullying and harassment, including sexual and gender-based harassment. Our goal is for everyone to have a sense of being included and belonging at IDP.

Each one of us contributes to creating this environment. Together we comprise a rich community of people of different races, ethnic backgrounds, ages, abilities, beliefs, sexual orientations, cultures and languages.

We are strengthened by our diversity. Our commitment to this, as well as providing environments focused on inclusion and equity, enables us to recruit and retain the best people while delivering outstanding service. As we work together as a global team, we make decisions based on individual ability, performance, experience and IDP's business needs.

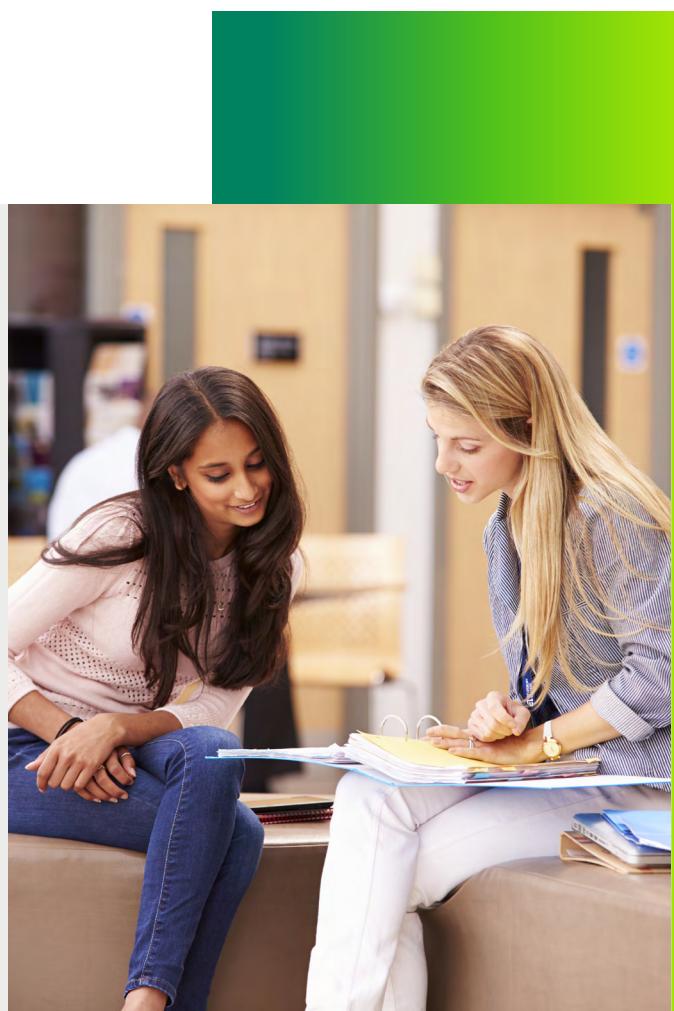
We encourage diversity, in all its forms, through our [Inclusion, Diversity and Equity Policy](#). Our Global Diversity & Inclusion Committee, provides a forum to consider matters including those raised by our internal resource groups around the world.

In line with our commitment, we do not allow any form of discrimination, bullying or harassment of team members, contractors, customers and/



or visitors. This includes any demeaning, insulting, embarrassing or intimidating behaviour related to gender identity, sex, race, ethnicity, sexual orientation, physical or mental disability, age, pregnancy, religion, nationality, family or caring responsibilities, marital status, political opinion, or any other legally protected status.

Workplace harassment can be perceived for any of the reasons identified above and is seen to be any action that inappropriately or unreasonably creates an intimidating, hostile or offensive working environment.



## Question

My Supervisor requires the team to meet sales targets and other goals. Every month there's another requirement.

Isn't this harassment?

## Answer

It is not considered harassment for Supervisors or Managers to monitor job performance in a fair and consistent manner.

# Our Work Environment

## Sexual Harassment

Sexual harassment is workplace harassment of a sexual nature which affects the dignity of people at work, including our customers.

At IDP we specifically ban unwelcome sexual advances or physical contact, sexually oriented gestures and statements, and the display or circulation of sexually oriented pictures, cartoons, jokes or other materials. We also prohibit retaliation against any person who rejects, protests or complains about sexual harassment.

If you feel you have been harassed or sexually harassed, or have observed such conduct, you must:

1. If you feel comfortable doing so, tell the offender the action is not welcome, or
2. If you are not comfortable talking to the person directly, tell your Supervisor or Manager, or a more senior manager such as your Country Director or Regional Director immediately. You can also contact an appropriate member of IDP's Global Leadership Team, any other senior manager you feel comfortable speaking to or a member of the People Experience team.

## Bullying

At IDP we prohibit any form of bullying in the workplace. Bullying can include either physical or psychological mistreatment which is repeated, unreasonable behaviour. It can be overt (violence, abuse, intimidation) or covert (constant rude or belittling comments).

We also prohibit people from engaging in any hostile physical contact, intimidation, threats of such actions or violence, or any other actions that may be considered threatening or hostile in nature while on IDP premises, at an IDP sponsored function, or while representing IDP or acting on its behalf.

While you are expected to report incidents of this nature to your Supervisor or Manager, there may be situations where this is difficult. In these cases, you can report an issue by emailing [yourvoice@idp.com](mailto:yourvoice@idp.com) or by contacting the Chief People Officer directly.



# Our Business

## Our Business and Financial Records

As part of IDP's responsibilities to shareholders and the financial community generally, IDP's financial and business affairs and records must always be complete, reliable and accurate.

This means that you must:

- Ensure the accuracy of all financial records such as financial accounts, wage and time records, or expense reports
- Always record and classify transactions in the correct manner and do not delay or accelerate the recording of revenue or expenses to meet budget goals
- Ensure that all reports to auditors and regulatory authorities are full, fair, accurate, timely and understandable
- Never falsify any documents
- Strive for accuracy. Honest mistakes will occasionally happen. Only intentional efforts to misrepresent, improperly record transactions or falsify company business records are violations of the Code



## Behaving Professionally

Our success as a business is based on the outstanding professionalism and service focus of our people. The everyday actions of each of us reflect on our standing within our communities.

When representing IDP you must:

- Compete vigorously, engaging only in practices which are ethical and legal
- Demonstrate honesty and integrity in all our business dealings on behalf of IDP
- Never solicit, accept, offer, promise or pay bribes. Bribes are strictly prohibited
- Always act in accordance with the standards and expectations that are outlined in our global policies

## Question

I think my colleague is entering false data into our systems so that they can make their sales targets.

What do I do?

## Answer

Discuss your suspicions with your Supervisor or Manager as soon as possible. If you are uncomfortable raising your concern with your Supervisor or Manager, speak with your Country or Regional Director.



# Our Business

## Company Assets

Our time at work is spent getting the best possible result and experience for our customers.

- You must not engage in personal activities during work hours that interfere with or prevent you from fulfilling your job responsibilities
- You must use and maintain IDP's assets with care and respect while protecting against waste, abuse and negative environmental impacts
- You must not use company assets for personal benefit or for the benefit of anyone other than the company
- You understand that theft of company assets, whether physical assets, information, embezzlement or intentional misreporting of time or expenses, may result in termination of employment or even criminal prosecution
- You must not use company computers and equipment for illegal or unethical activities such as gambling, pornography or other offensive subject matter. Refer to IDP's Acceptable Use of Electronic Facilities Policy
- You must return all IDP assets such as tools, equipment, documents, software or other technology tools when you finish working at IDP and ensure that IDP's intellectual property remains secure even after you no longer work with the company
- You must ensure that company credit cards/ funds are only used to pay for genuine, legitimate business expenses

## Securities Trading

At IDP, as an ASX listed company, we are committed to maintaining market integrity and complying with all applicable laws regarding securities trading. Team members, regardless of where they are located, must never trade in IDP securities while in possession of inside information—meaning any non-public, price-sensitive information that could influence the value of IDP shares. If you have been notified that you are

a 'designation person', further restrictions on trading apply. Breaches of securities trading laws may carry civil or criminal penalties under Australian law.

## Information

You are obliged to protect the company's Confidential Information at all times, during or outside work hours, or even after our employment ends.

Each of us is responsible for ensuring that all information accessed through the company is collected, kept, disclosed, handled and used in a manner that complies with all applicable privacy and data laws.

### What sort of information is confidential and not to be shared?

Things such as:

- The details and records of our team members, clients, shareholders, business partners and customers
- Business and financial plans or forecasts
- Recent business performance and volumes
- New business initiatives
- Proposals, contracts, pricing or commission rates
- Marketing and sales plans and strategies
- Mergers or acquisitions
- Intellectual property, software or technical specifications

A simple rule to follow is to treat any information that is not available on the IDP website or in any other 'public forum' as confidential.

Any presentation or paper you are using externally must be approved by your Country or Regional Director, a member of the Global Leadership Team, or the Head of Global Corporate Communications. Additional protocols apply to briefings with the media. More guidance is outlined in [IDP's media protocols](#), which must be adhered to.

## Question

I am giving a presentation to a group of students in my capacity as a part time lecturer and wish to use examples from my work at IDP.

What do I do?

## Answer

Discuss your proposed presentation with your Supervisor or Manager before sharing it externally. Your Supervisor or Manager may need to get approval from the Country/Regional Director or the Head of Global Corporate Communications to ensure IDP's private information is protected.



# Ethical Conduct

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## Anti-Bribery and Anti-Corruption

Our [Anti-Bribery and Anti-Corruption Policy](#) adopts a 'zero tolerance' approach to bribery and corruption. In this policy you will find information on key risk areas, processes for preventing bribery or corruption as well as reporting concerns.

Team members must report any attempts of bribery or corruption to their Supervisor or Manager immediately.

## Anti-Competitive Conduct

In many countries laws exist to ensure businesses can compete fairly. Our company is committed to complying with competition and anti-trust laws in all markets in which we operate. Where a business does not comply with these laws there can be significant consequences, including reputational damage, fines, and criminal liability including prison time for team members involved in contraventions.

When it comes to relationships with competitors the following activities cannot be undertaken:

- **Price Fixing** - this includes any agreement or practice between competitors that restricts or aims to restrict price competition. This is a criminal offence in many countries and involves very significant fines
- **Market sharing** - this involves any agreement or practice to allocate markets, whether by product territory, channel, type or size of customer

- **Bid rigging** - coordinating tenders between competitors
- **Exchange of confidential information and commercially sensitive information**

If you are unsure on any of the following activities, you must seek advice from the global governance team at [governance@idp.com](mailto:governance@idp.com) before taking any further action.

## Modern Slavery

IDP supports international efforts to prevent modern slavery and is committed to understanding and addressing modern slavery risks within our business and our supply chain.

Examples of modern slavery include underpayment of wages, forced labour, exploitative working conditions, and other slavery-like practices.

[Our Supplier Code of Conduct](#) sets out the expectations and obligations of our suppliers. If you become aware of any of these practices, either directly at IDP or by any of our suppliers, you should notify your Supervisor or Manager and/or follow our Whistleblower Policy guidelines.

More information on what we are doing to prevent modern slavery can be found in our [Modern Slavery Statement](#).

# Conflict of Interest

A conflict of interest comes about when we put our personal, social, financial or political interests before the interests of IDP. Conflicts of interest are to be avoided because, besides the legal concerns, they can provide an appearance that IDP does not undertake business in a fair and ethical manner.

- You must avoid financial, business or other relationships that might be opposed to IDP's interests or be seen to cause a conflict with the performance of our duties
- You must act in the best interests of the business while performing our work for IDP by making sound, impartial and objective decisions on behalf of the company
- You must not use IDP's property or information for personal gain or take personal advantage of any opportunity that arises during the course of our work
- You must take necessary steps to avoid improper reporting relationships and do not directly or indirectly supervise or report to people you have a family or a close personal relationship with. Where you find this might be a conflict, you must discuss it with your Supervisor or Manager as soon as possible and ensure the People Experience team is told

- You must not take personal advantage of, or help others to take advantage of, business opportunities that you discover through the use of IDP property, information or position. Nor can you compete with the company directly or indirectly
- You must not compete with IDP by providing service to a competitor as a team member, officer or in a similar capacity. Should you wish to provide services to another business, you must seek approval in writing from your Supervisor or Manager first
- You must report any activity that would be in conflict with the requirements and expectations outlined in our global policies

## Important!

Any conflict of interest must be disclosed to your Supervisor or Manager in writing.



# What is a conflict of interest?

## Is it a conflict of Interest?

If you think there is potential for conflict of interest, ask yourself:

- Could my personal interests interfere with the company's interests?
- Might it appear that way to others, either inside or outside the company?

## Not sure? Ask your Supervisor or Manager, they are here to help.

The key to addressing conflicts of interest is full disclosure. If you think there may be a conflict of interest you must discuss it with your Supervisor or Manager. Often just telling your Supervisor or Manager about the potential conflict is all that is required.

### Question

My sister works at University XYZ which is a client of IDP's. She has been promoted to a new role and now has to negotiate directly with me and I am the decision maker.

What do I do?

### Answer

Tell your Supervisor or Manager and he or she will decide if they need to take any steps.



### Question

I need to make extra money and want to start a second job. Is this a problem?

### Answer

You can take a job outside of IDP as long as it does not interfere with your ability to do your job.

Please talk to your Supervisor or Manager to make sure all is okay.



## How does a conflict of interest happen?

A conflict, or appearance of a conflict of interest, may happen by:

- Accepting an expensive gift or a loan from a current or potential customer, supplier or competitor
- Not disclosing that you own or have a financial interest in another business which either competes with IDP or supplies goods to IDP
- Using confidential company information or other business assets for personal profit
- Being aware of information regarding a conflict of interest for yourself or another person and not disclosing this
- Conducting business for another company during IDP's normal working hours, or using company property to conduct business for another enterprise

# What is a conflict of interest?

## Gifts, meals or entertainment

IDP operates across many different cultures and customs. We believe in conducting our business in an honest, ethical and transparent manner.

We acknowledge the practice of giving and receiving gifts of modest or symbolic value, (such as a logo pen, t-shirt, cap, or trophy), or a meal or limited hospitality, as long as they are consistent with the customary business practices within that country.

A variety of factors such as local laws, industry codes, customs, culture and exchange rates may influence the level of acceptability. A maximum limit on the value of any gift (giving or receiving) is set at AUD100 and a maximum total limit for meals, entertainment and events is set at AUD200 per person. If there is a need to operate outside these limits, approval should be sought in line with the Anti-Bribery, Fraud & Corruption policy.

- You must not accept gifts in exchange for doing or promising to do anything for a student, client or supplier
- You must not ask for gifts, nor can you accept gifts of cash or cash equivalents

## Giving gifts, meals or entertainment

- You must not seek any improper or unfair business advantage by providing gifts, meals or entertainment
- You can provide occasional gifts, meals or entertainment as long as it is in the course of a legitimate, legal, business relationship, consistent with IDP policies and procedures

We wish to avoid any improper conduct or the appearance of improper conduct. If accepting or giving a gift, meal, entertainment or any other favour may compromise or appear to compromise our ability to make objective business decisions which are in the best interests of IDP, you must not do so.



We believe in conducting our business in a honest, ethical and transparent manner.

# What is a conflict of interest?



## Using IDP's Resources

At IDP, we have access to a wide range of technology and data designed to help us deliver exceptional service to our customers and achieve our business objectives. It is essential that we use these tools **efficiently, securely, and responsibly**.

When accessing and using IDP technology and data, including software, email, internet, social media, and cloud services, you must comply with the **Acceptable Use of Technology Policy**.

## Key Principles for Secure and Ethical Use of IDP Technology and Data

- Protect Confidentiality and Data Integrity**  
Never disclose IDP's intellectual property, customer or client information, or any sensitive data. This includes avoiding behaviours that could lead to data leakage, whether intentional or accidental.
- Avoid Unlawful or Policy-Breaching Activities**  
Do not use IDP systems for activities that are illegal, violate company policies, or could cause reputational harm.
- Prevent Data Loss Risks** - Do not transfer, store, or share personal files, sensitive information, or any material that could compromise IDP's security. AI tools and automated systems should only be used in compliance with IDP's security and privacy standards.

## AI and Emerging Technologies

When using AI-powered tools, ensure that:

- No sensitive or confidential data is entered into external AI platforms without prior approval.
- Outputs from AI tools comply with IDP's security, privacy, and ethical standards.

- AI is used to **enhance productivity**, not to bypass compliance or introduce risk.

## Inappropriate use is strictly forbidden, including (but not limited to)

- Sharing confidential or proprietary information outside authorised channels
- Illegal, harmful, discriminatory, or offensive activities, including posting or transmitting offensive, obscene, discriminatory, or harassing content
- Unauthorised mass communications or spam
- Gambling, gaming, or auction-related activities
- Uploading or storing your personal files on IDP devices, including photos and videos
- Breaching intellectual property rights
- Introducing malicious software or instructions that compromise security
- Conducting personal commercial business using IDP technology or data

## Personal Use

Sometimes, you may need to take care of a personal task while you're working. That's okay, as long as you:

- Use good judgement
- Make sure it doesn't take too much time
- Avoid any risk to IDP's data or systems
- Don't let it affect your ability to do your job well

Please be aware that all activities can be visible when using IDP technology resources. We recommend you maintain your privacy by using personal devices to perform sensitive personal tasks and store personal information.

Use may be monitored and excessive personal use and/or use that is not reasonable, may be blocked.

# What is a conflict of interest?

## Examples of Acceptable vs Unacceptable Use

### Digital Platforms (Internet, Social Media, Instant Messaging, E-mail):

- ✓ Checking personal social media during lunch break is acceptable.
- ✗ Spending more than a few minutes on personal social media accounts is not acceptable.
- ✓ Using instant messaging for a quick personal update is okay.
- ✗ Sharing confidential company documents via personal messaging apps is strictly forbidden.



### AI Tools



- ✓ Using approved AI tools to summarise internal documents for work purposes is acceptable.
- ✗ Uploading customer data or proprietary information into public AI platforms is not acceptable.
- ✓ Leveraging AI for grammar checks on non-sensitive text is okay.
- ✗ Using AI to generate content that violates company policies or exposes sensitive data is prohibited.

### Managing IDP Data

- ✓ Encrypting files before sharing internally is acceptable.
- ✗ Sending data to external parties without appropriate document controls is not acceptable.
- ✓ Storing work-related files in approved cloud storage is okay.
- ✗ Uploading confidential files to personal drives or unauthorised platforms is strictly forbidden.



If you're unsure whether something is appropriate, ask your manager.

# Maintaining Standards of Conduct

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We are all responsible for maintaining the standards of conduct set out in the Code as well as any other applicable Codes of Conduct and IDP Policies.

Where it's reported or suspected that someone is not behaving in line with the expectations set out in the Code, steps will be taken to investigate.

Disciplinary measures may also apply to anyone who directs or approves breaches, condones misconduct, fails to report or take reasonable measures to prevent, detect and address misconduct, or seeks to retaliate against those who report potential misconduct in good faith.

## Your Agreement

Each of us have a responsibility to read the Code of Conduct and ensure that we understand its contents. We share our commitment to meeting the expectations set out in the Code by signing a simple agreement recognising of our commitment.

Not reading the Code of Conduct, or not signing the agreement does not excuse any of us from complying with the Code. Together, we will regularly refresh our commitment to this and other key business policies.

