



Code of Conduct Policy (Board)

Approved by the Board: January 2026

Contents

1. Policy Statement	X
2. Objectives	X
3. Policy Scope	X
4. Policy Details	X
5. Roles and Responsibilities	X
6. Monitoring, Evaluation and Review	X
7. Policy Owner	X
8. Review & Sign off	X

1. Policy Statement

The Board of IDP Education Ltd (IDP) requires the adoption and ongoing compliance with our Code of Conduct which outlines the standards expected of all team members of IDP. The Code of Conduct (the Code) provides information to assist in the understanding of the ethical values and the personal and business standards of behaviour expected of our people.

2. Objectives

The purpose of this Policy is to ensure that the Code is readily available to all IDP team members and to ensure compliance with the Code is monitored and enforced.

3. Policy Scope

This Policy applies to all IDP global business operations, all IDP team members and the Board of Directors. For the purpose of this Policy, team members includes casual employees and contractors as well as full and part time team members of IDP.

4. Policy Details

The Code sets out what the IDP Values look like in practice and reinforces IDP's commitment to a workplace free of unlawful or inappropriate behaviour. The Code includes information on and addresses the following matters:

General Guidance

IDP's values and the purpose of the Code are explained as well as how the Code is to be applied and the interaction between the Code and local law.

People

The Code sets out the expectations of our team members and managers, detailing the standard of behaviour expected which supports a productive, safe and enjoyable working environment. The Code reinforces the expectation that IDP team members will treat each other with respect, recognizing the diversity of our team members of different races, ethnic backgrounds, sexual orientation, cultures and languages.

Conducting Business

The Code outlines IDP's expectation regarding the maintenance of accurate business and financial records, use of company resources, as well as the requirement to behave professionally and ethically at all times and in all company dealings. The Code also addresses how company assets and information is used and the manner in which conflicts of interest should be dealt with.

Administering the Code

All team members are required to agree to abide by the Code as part of their induction process and to regularly acknowledge the Code thereafter.

5. Roles and Responsibilities

Global Leadership Team (GLT) – has responsibility to set the tone for the embedding of the Code of Conduct Policy and the Code across the organisation. The GLT will actively foster application of the Code and will address breaches of the Code which are escalated to them.

Managers – are expected to support team members and to investigate breaches of the Code, in accordance with the processes outlined in the Code and related Policy.

All team members – are required to acknowledge their understanding of and commitment to abide by the Code. Team members are also expected to raise breaches of the Code with their manager, through a YourVoice notification or make a report under the Whistleblower policy.

6. Monitoring, Evaluation and Review

IDP will review this Policy at least every two years.

7. Policy Owner

Chief People Officer

8. Review & Sign off

Action	Date	Responsibility
Endorsed	13 September 2012	Audit & Risk Management Committee
Approved	23 October 2012	Board
Endorsed	8 December 2014	Audit & Risk Management Committee
Approved	5 February 2015	Board
Endorsed	8 February 2017	Audit & Risk Management Committee
Approved	4 April 2017	Board
Endorsed	3 April 2019	Audit & Risk Committee
Endorsed	18 June 2019	Board
Endorsed	23 June 2021	Audit & Risk Committee
Approved	24 August 2021	Board
Endorsed	12 April 2023	Audit & Risk Committee
Approved	12 April 2023	Board
Endorsed	8 December 2025	Audit & Risk Committee
Approved	21 January 2026	Board