International Centre for Missing & Exploited Children, Australia Ltd (ABN 86 645 682 828)

Code of Conduct

Version 2.3 – October 2026

Table of Contents

Table of Contents **2**

1. Introduction **4**

2. Purpose **4**

3. Application **5**

4. Values **5**

4.1 Partnership 6

4.2 Empowerment 6

4.3 Innovation 6

5. Principles and commitments **7**

5.1 Business ethics 7

5.2 Giving and accepting business courtesies 7

5.3 Mutual respect 8

5.4 Ethical conduct 8

6. Professional and personal conduct **8**

6.1 Compliance with laws and regulations 8

6.2 Privacy and intellectual property 9

6.3 Confidentiality and control of information 9

6.4 Corporate opportunities 10

6.5 Financial integrity 10

6.6 Personal conduct 11

6.7 Business agreements and contracts 11

6.8 Avoiding or managing conflicts of interest 12

6.9 ICMEC Australia and it's team members 12

6.10 Other policies regulating team member behaviour 13

6.11 Work Health and Safety 13

7. Protecting children from harm and survivor trauma awareness **14**

7.1 Protecting children from harm 14

7.2 Trauma awareness including for survivors of child abuse 14

8. Other matters 15

8.1 Reporting of suspected fraudulent or unethical behaviour.....15

8.2 More information.....15

9. Breach of Code..... 15

10. Monitoring and review of Code 16

1. Introduction

International Centre for Missing and Exploited Children, Australia Ltd (ICMEC Australia) is committed to maintaining the highest ethical standards in the conduct of its business activities and anyone involved with the organisation is expected to follow these standards. Acting ethically and responsibly goes well beyond mere compliance with legal obligations and involves acting with honesty, integrity, and in a manner that is consistent with the reasonable expectations of the broader community. It includes being, and being seen to be, a 'good corporate citizen', for example by:

(a) respecting the human rights of its employees

(b) creating a safe and non-discriminatory workplace

(c) demonstrating a strong commitment to child protection and survivor trauma awareness

(d) dealing honestly and fairly with suppliers and clients

(e) acting responsibly towards the environment

(f) only dealing with business partners who demonstrate ethical and responsible business practices.

2. Purpose

The purpose of this Code of Conduct (Code) is to establish clear expectations, guidelines, and standards of behaviour expected of all Board Directors, Committee Members, employees, interns, volunteers and contractors of ICMEC Australia (collectively referred to as 'team members'). It reflects our mission, values, and connects them to professional behaviour standards. This Code aims to promote integrity, transparency, accountability, and professionalism in all activities related to ICMEC Australia, ensuring that team members act in the best interest of ICMEC Australia and its stakeholders. The Code also provides assurance to stakeholders, including partners, donors, and others, that ICMEC Australia holds itself accountable to the highest standards of integrity and professionalism and reinforces its commitment to ethical conduct throughout the organisation.

The Code requires team members to adhere to the law including those related to occupational health and safety, privacy, and equal opportunity. The standards outlined in this Code are not intended to address every situation that may give rise to legal, ethical or professional concerns. Accordingly, the Code should not be viewed as a comprehensive set of rules governing conduct. Rather, it establishes a framework of guiding principles designed to support sound judgment, promote ethical decision-making, and reflect ICMEC Australia's values and expectations regarding professional and business conduct.

(a) This Code clearly states the standards of responsibility, and ethical conduct expected of you as a team member of ICMEC Australia. It applies both within and outside of the workplace, and where you can be perceived as representing ICMEC Australia.

(b) To the extent of any inconsistency between this Code and the *Fair Work Act 2009* (Cth) as amended from time to time (the Act), the provisions of the Act shall prevail.

(c) You need to exercise sound judgment when evaluating an issue of business conduct. If you are in any doubt, you should seek advice from your manager, Company Secretary, ICMEC Australia Chief Executive Officer (CEO) or your first point of contact (for volunteers and contractors) before taking any action which may compromise yourself, or ICMEC Australia.

(d) The Code operates in conjunction with ICMEC Australia's policies, procedures, guidelines and your contract of employment (for employees and interns), or contract for service (for contractors or volunteers), or Board Charter (for Board Directors) or Terms of Reference (for Committee Members), including post-employment or post-engagement obligations.

3. Application

It is expected that ICMEC Australia team members be familiar with and are committed to meeting these standards of the Code. Compliance with this Code is mandatory and it is the personal responsibility of every person to understand and abide by it throughout their employment or engagement with ICMEC Australia.

This Code includes situations where a team member may need to speak to someone more senior than them. Each role's relevant contact person is as follows:

(a) For employees, interns or volunteers – your manager;

(b) For Board Directors – the Board Chair or Company Secretary;

(c) For Committee Members – the Board Directors or Company Secretary;

(d) For contractors – your ICMEC Australia contract manager.

4. Values

The Code is underpinned by a set of organisational values that inform the behaviours of all team members at all times. These values are:

(a) Partnership

(b) Empowerment

(c) Innovation.

4.1 Partnership

Team members demonstrate partnership by:

(a) Building trusted and collaborative relationships with colleagues, partners and stakeholders

(b) Working together to achieve shared goals and create lasting impact

(c) Valuing diverse perspectives, experiences and expertise when making decisions and delivering activities

(d) Supporting and encouraging others through open communication, cooperation and mutual respect

(e) Recognising and celebrating the contributions and achievements of colleagues and partners.

4.2 Empowerment

Team members demonstrate empowerment by:

(a) Enabling victim-survivors, colleagues and stakeholders to have a voice and participate meaningfully in discussions that affect them

(b) Taking ownership of their work and acting with confidence, accountability and integrity

(c) Supporting the growth, development and wellbeing of others

(d) Encouraging initiative, learning and continuous improvement

(e) Creating an inclusive environment where everyone feels respected, valued and able to contribute.

4.3 Innovation

Team members demonstrate innovation by:

(a) Seeking better ways to prevent child exploitation and improve outcomes for victim-survivors

(b) Embracing new ideas, technologies and approaches to solve complex challenges

(c) Being open to learning, experimentation and evidence-based practice

(d) Adapting to changing environments and emerging threats with agility and resilience

(e) Continuously looking for opportunities to improve efficiency, effectiveness and impact.

5. Principles and commitments

5.1 Business ethics

You must conduct yourself with openness, honesty, care, integrity and in the best interests of ICMEC Australia in all business transactions and in all dealings with others including suppliers, employees, donors, governments, and the general public.

This means that you:

(a) must not make promises or commitments which to your knowledge ICMEC Australia is unable to, or does not intend to, honour

(b) must not use ICMEC Australia's name or your position for personal gain

(c) must act with due care and diligence and in accordance with ICMEC Australia's values in fulfilling the functions of your office or employment or engagement

(d) should not engage in conduct which may bring discredit upon ICMEC Australia.

5.2 Giving and accepting business courtesies

(a) You must not give, seek or accept in connection with ICMEC Australia's operations any gifts, meals, refreshments and entertainment which goes beyond or is unrelated to, ordinary and proper course of business. Pro bono or low bono goods and services (such as a coffee from a stakeholder) may be accepted, provided that the arrangement does not place the recipient under any obligation, is not recurring or systematic, and could not reasonably be construed as a bribe or improper inducement. If you are unsure about the appropriateness of a gift or benefit, you must seek guidance from your role's relevant contact person as outlined in section 3.

(b) Any personal gift, entertainment or other personal favour or assistance given or received which has a value in excess of an amount determined by the ICMEC Australia Board (**Board**) ($250 as at November 2025, but which may be revised), must be declared to, and approved by the CEO and recorded in the gifts register maintained by the Company Secretary. The $250 limit may be a one-off gift or a cumulative value from a single source in a 6-month period. Any gift not declared may be viewed as a bribe.

(c) The rationale for this restriction is that the offer or acceptance of a gift can create an obligation or be construed or used by others to allege favouritism, discrimination, collusion or similarly unacceptable practices by ICMEC Australia.

(d) You must not, directly or indirectly, offer, promise, give, demand, solicit or accept any bribe or other improper payment or benefit, whether in the public or private sector. Offering a bribe to a government official and the receipt of a bribe by a government official is prohibited under Australian law (including the *Criminal Code Act 1995* (Cth), and the laws of most countries). Australia is a signatory to the Organisation for Economic Co-operation and Development (OECD) *Convention Combating Bribery of Foreign Public Officials in International Business Transactions* and has enacted legislation prohibiting the offering of anything of value to foreign public officials which enables it to prosecute its citizens and corporations for the bribery of public officials in other countries.

(e) A contravention of anti-bribery legislation has serious consequences, such as imprisonment or fines.

(f) You should not make any payments or payments in kind (gifts, favours, etc.) to influence individuals to award business opportunities to ICMEC Australia or make business decisions in ICMEC Australia's favour.

5.3 Mutual respect

You are expected to treat with courtesy, care and respect your colleagues, clients, suppliers, donors, and anyone else with whom you interact in your work. You must not engage in bullying, harassment or unlawful discrimination, in accordance with ICMEC Australia's Equal Opportunity and Anti-Discrimination Policy. You are encouraged to "speak up" to your role's relevant contact person (as outlined in section 3) when you witness any behaviour that is inconsistent with this Code.

5.4 Ethical conduct

(a) You must act ethically in your approach to business decisions.

(b) In negotiating and administering contracts and other business relationships, you are expected to be fair and reasonable. You must not behave in any way that is, or might be construed as being harsh, oppressive, unconscionable, unethical, coercive or dishonest.

6. Professional and personal conduct

6.1 Compliance with laws and regulations

(a) You must comply with all laws and regulations relating to your business conduct and ICMEC Australia's operations. This includes being familiar with the duties and responsibilities applying to you under the laws relevant to ICMEC Australia and in the

context of your role in ICMEC Australia. You must complete all mandatory compliance training applicable to your role within designated timeframes.

(b) Any activities carried out by yourself or ICMEC Australia outside Australia must comply with the foreign laws which may apply to any activities or operations.

(c) The laws that govern ICMEC Australia's business activities may be complex. You are encouraged to contact the Company Secretary if you are unclear about laws or regulations relating to your work.

6.2 Privacy and intellectual property

(a) You may have access to records which contain information that may be of a personal nature, or that ICMEC Australia has obtained to assist in the management of the business. This information is private and confidential and must not be disclosed to any unauthorised third party.

(b) All intellectual property that you generate in relation to ICMEC Australia and its activities is the property of ICMEC Australia. You are responsible for protecting ICMEC Australia's intellectual property rights.

6.3 Confidentiality and control of information

(a) You must ensure that you do not disclose any confidential information or proprietary information to any third party or other employee who does not have a valid business reason for receiving that information, and without prior authorisation.

(b) "Confidential information" in this context means information that ICMEC Australia considers private and that is not generally available outside ICMEC Australia.

(c) "Proprietary information" in this context means information that ICMEC Australia owns, develops, pays to have developed, or to which it has an exclusive right.

(d) If confidential information or proprietary information is required to be provided to third parties or other employees for valid business purposes or under an order of compulsion, ICMEC Australia and its team members must:

i. notify their role's relevant contact person (as outlined in section 3) and document the reason why disclosure needs to occur

ii. where appropriate (not relevant under an order of compulsion), seek authorisation from the CEO

iii. where appropriate, seek legal advice and if required, enter into a contractual data sharing agreement

iv. take adequate precautions to ensure that information is only used for those purposes for which it is provided and is not misused or disseminated to ICMEC Australia's detriment

v. ensure that the information is returned or destroyed when the purpose is complete

vi. document all stages of this process to ensure transparency.

(e) You must:

i. return all ICMEC Australia property including any documents or confidential information or proprietary information, on termination or on the request of ICMEC Australia or its representative

ii. if requested by ICMEC Australia or its representative, destroy or delete any confidential information or proprietary information stored in electronic, magnetic, or optical form so that it cannot be retrieved or reconstructed.

During your engagement with ICMEC Australia, you may utilise devices, such as a work-issued laptop or your personal mobile phone, or access systems, such as ICMEC Australia's SharePoint, which can involve exposure to or handling of sensitive information and data. For further information about protecting privacy, maintaining confidentiality, and ensuring proper control of information when using devices or accessing systems for work, please refer to the Cyber Security Policy and Key Business Systems Guidelines.

6.4 Corporate opportunities

With the exception of Board Directors and Committee Members, you must obtain written approval from the CEO prior to pursuing or benefiting from business opportunities arising as a result of your position within ICMEC Australia or the use of ICMEC Australia's property or information.

6.5 Financial integrity

(a) ICMEC Australia has stringent financial accounting procedures that are overseen by the Board. Therefore:

i. the use of ICMEC Australia funds or assets for any unauthorised or unethical purpose, including for the advantage of others, is prohibited. No undisclosed funds or assets of ICMEC Australia have, or will be, maintained or established for any purpose

ii. no false or misleading entries may be made in the books or records of ICMEC Australia for any reason

iii. no payment on behalf of ICMEC Australia may be made or approved on the understanding that it will or might be used for something other than the stated purpose.

(b) You must ensure that:

i. all assets, liabilities and revenue are documented in ICMEC Australia's financial books, records, reports, and statements

ii. expenses accurately reflect all transactions of ICMEC Australia and are retained in accordance with ICMEC Australia's policies and all applicable laws and regulations.

6.6 Personal conduct

You are expected to adhere to the following standards of personal conduct:

(a) act honestly, in good faith, and in the best interests of ICMEC Australia as a whole

(b) use due care and diligence in fulfilling the functions of your position and exercising the powers attached to your employment or engagement with ICMEC Australia

(c) attend and undertake your work without being under the influence of drugs, alcohol, or other substances or being distracted by personal business or other interests

i. Alcohol may be consumed at work-related social events, networking events, or conferences. You must not be under the influence of alcohol to such an extent as being incapacitated or incapable of carrying out your work in a productive manner.

(d) use social media in a way that demonstrates professionalism, respect, integrity and child-safe behaviour. Online conduct must not undermine public confidence in ICMEC Australia, compromise the privacy or wellbeing of children, or adversely affect ICMEC Australia's reputation, partnerships, operations, or safeguarding obligations.

(e) protect any ICMEC Australia assets under your control and not use them for personal purposes, without ICMEC Australia's prior approval

(f) disclose all information that may impact on your relationship with, or capacity to perform your duties for, ICMEC Australia, including but not limited to any criminal charge or conviction.

6.7 Business agreements and contracts

ICMEC Australia expects to fairly and ethically pursue all business opportunities. If you are involved in the negotiation of agreements on behalf of ICMEC Australia or an entity controlled by ICMEC Australia:

(a) you must ensure that you act in accordance with the law

(b) all statements, communications and representations made to clients, suppliers, partners, and others with whom you undertake business transactions, should be accurate and truthful and must not be misleading or deceptive

(c) all appropriate approvals must be obtained before any agreements are executed

(d) you acknowledge that ICMEC Australia is committed to meeting all of its contractual obligations and accordingly you are expected to know, understand, and honour the terms of ICMEC Australia's contractual obligations that are relevant to your role.

6.8 Avoiding or managing conflicts of interest

(a) A conflict of interest arises when a person is in a position which requires them to balance their own interests or the interests of others (such as friends or relatives) against the interests of ICMEC Australia. You must fully and promptly declare relationships when participating in decisions affecting another person with whom you have a personal or professional relationship which may lead to actual, potential and/or perceived conflicts of interest. You must not use your position, role, authority, work duties or status to gain, or seek to gain, a benefit for yourself or a third party.

(b) Avoiding all conflicts of interest, whether actual, potential and/or perceived is not always feasible. If you are under any doubt regarding an actual, potential and/or perceived conflict of interest, you should always err on the side of caution and declare the interest without delay to the CEO or the Company Secretary.

(c) To assist in the management of conflicts, a register will be maintained and made accessible to all team members. All team members will be required to register actual, potential and/or perceived conflicts. The register will be stored within the Key Business System (SharePoint) and will be reviewed monthly. All team members will be reminded via email to ensure their conflicts are registered and up to date during the monthly review. The team member conflict of interest register is maintained by the Operations team.

(d) The Company Secretary will maintain a **confidential** register of conflicts of interest that have been disclosed to ICMEC Australia and will document steps taken to manage each conflict.

(e) Board Directors and Committee Members of ICMEC Australia are subject to the Conflict of Interest Policy, and as such their conflicts are managed in accordance with the processes contained in that policy. For clarification, the requirements under para 6.8(b) and (c) do not apply to Board Directors or Committee Members.

6.9 ICMEC Australia and it's team members

(a) ICMEC Australia actively supports the principle of equal employment opportunity regardless of race, religion, national origin, sex, age, physical disability, marital status, or sexual orientation and expects everyone to practise and support this principle.

(b) ICMEC Australia believes that every individual has the right to dignity and respect in the workplace. Therefore, ICMEC Australia regards any bullying or harassment, including sexual harassment are not tolerated under any circumstances. Such behaviour is unacceptable regardless of whom the perpetrator is and may lead to termination of employment or engagement with ICMEC Australia.

(c) The use of any medium (including email or the Internet) to disseminate material which is sexually explicit, defamatory, vulgar, or racist is prohibited.

(d) You must not make offensive, inappropriate, disparaging or demeaning comments, remarks or posts (including on social media) about ICMEC Australia or its team members.

(e) The use of ICMEC Australia facilities to access material which is sexually explicit, defamatory, vulgar, or racist is also prohibited.

These policies are further detailed in ICMEC Australia's Respect in the Workplace Policy and apply to you regardless of your position.

6.10 Other policies regulating team member behaviour

(a) ICMEC Australia has policies and procedures which govern conduct of its business and operations. Team members are expected to make themselves familiar with ICMEC Australia's policies and procedures that apply to them and their role, and to adhere to those policies in conducting business or operations on behalf of ICMEC Australia. These policies may include, but are not limited to, the following:

   a. Attendance and Annual Leave Policy
   b. Child Protection Policy
   c. Cyber Security Policy
   d. Equal Opportunity and Anti-Discrimination Policy
   e. Flexible and Remote Working Policy
   f. Key Business System Guidelines
   g. Modern Slavery Policy
   h. Respect in the Workplace Policy
   i. Risk Management Framework
   j. Travel and Expenses Policy
   k. WHS Policy

(b) You are also expected to know, and always act within, the limits of your authority to speak on behalf of ICMEC Australia and to commit ICMEC Australia to business transactions or to make other commitments on behalf of ICMEC Australia.

6.11 Work Health and Safety

(a) ICMEC Australia is committed to providing a safe work environment.

(b) You must take reasonable care for your own health and safety and take reasonable care so that your conduct does not adversely affect the health and safety of other persons. You must comply with ICMEC Australia's WHS Policy, safe work practices,

instructions and procedures, and report any safety concerns and incidents in accordance with the WHS Policy.

7. Protecting children from harm and survivor trauma awareness

7.1 Protecting children from harm

ICMEC Australia is committed to the protection and welfare of children. Regardless of your role within ICMEC Australia, you bear the responsibility of prioritising activities that will lead to the safety, and well-being of children.

(a) Background checks and screenings: all offers of employment with ICMEC Australia are subject to a police background check and obtaining a Working With Children Check (WWCC) where lawfully applicable. All team members may also be required to undergo these checks at the discretion of ICMEC Australia. These checks will be renewed at least every five (5) years. It is your responsibility to ensure that you advise ICMEC Australia if you no longer satisfy the conditions of a valid WWCC, or if a new police or background check would identify something new that may impact your and/or ICMEC Australia's ability to protect children.

(b) Communication Guidelines: ICMEC Australia adheres to the *Luxembourg Guidelines*, which provides essential standards for the proper use of child protection terminology. It is imperative that you familiarise yourself with these guidelines to ensure the responsible and sensitive use of language in child protection matters. Refer to ICMEC Australia's Branding Guidelines for further details.

If a team member becomes aware of a risk of harm to a child or suspected abuse, the priority is the child's immediate safety and wellbeing. If a child is in immediate danger, emergency services should be contacted via **000**. Where there are reasonable grounds to suspect abuse or exploitation, a report should be made to the relevant state or territory child protection authority and/or police, regardless of whether the child has formally disclosed the abuse.

For further details on reporting services, please see Braveheart's 'Report Child Sexual Abuse' webpage.

7.2 Trauma awareness including for survivors of child abuse

ICMEC Australia promotes trauma-informed awareness to foster a safe and supportive environment for all individuals, including survivors of trauma and child abuse.

(a) You must demonstrate a commitment to trauma awareness and sensitivity in your interactions and work related to ICMEC Australia. You must strive to be aware of the impacts of trauma on individuals and act with empathy, respect, and care when engaging with survivors of trauma.

(b) ICMEC Australia is dedicated to promoting trauma-informed practices and policies to ensure a safe and inclusive workplace. We aim to create an environment where survivors of child abuse, and all team members, can find understanding, support, and empowerment.

(c) As part of our commitment to trauma-informed care, ICMEC Australia provides trauma awareness training to Board Directors and employees. This training will equip our team with the knowledge and skills needed to approach trauma with sensitivity and to foster a workplace culture that is supportive and nurturing.

8. Other matters

8.1 Reporting of suspected fraudulent or unethical behaviour

If you suspect that any fraudulent or unethical behaviour has occurred or are concerned that any conduct by any team member may be in breach of applicable law or this Code, you must report to your role's relevant contact person (as outlined in section 3).

Reports may also be made in line with ICMEC Australia's Whistleblower Policy. ICMEC Australia will not tolerate retaliation in any form against an individual who reports a possible breach of this Code or of the law, or who assists in the investigation of a reported breach.

8.2 More information

If there are any questions regarding any aspect of this Code, please reach out for more information to your role's relevant contact person (as outlined in section 3).

9. Breach of Code

This Code of Conduct is an organisation-wide policy. Depending on the nature and context, a breach of the Code may be considered a serious matter.

Suspected breaches of the Code will be thoroughly investigated by ICMEC Australia. If these investigations reveal breaches of the Code, appropriate disciplinary and remedial action will be taken, depending on the nature of the breach. This may include, but are not limited to, providing the team member with training, coaching and counselling, formal warnings, and termination of employment, or other reasonable actions given the circumstance of the

situation. In the case of Board Directors, Committee Members, or contractors, a breach of this Code may lead to termination of engagement.

ICMEC Australia reserves the right to inform the appropriate authorities where a breach of this Code is considered to be something that is, or involves certain matters that are, required to be reported by law.

10. Monitoring and review of Code

This Code of Conduct was first adopted by the ICMEC Australia Board on 6 December 2023 and has since been updated.

The Board will review this Code of Conduct annually to ensure it operates effectively, meets the requirements of ICMEC Australia, and reflects any changes in legislation.

The Code can only be amended with the approval of the Board.

The Code of Conduct is available on ICMEC Australia's website.