

CODE OF CONDUCT POLICY

February 2026

The Smith Family

Learn today, change tomorrow.



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"Trust is the foundation of our relationships – with families, donors, partners, and each other."

Nicholas Moore
Chairman
The Smith Family

A MESSAGE FROM OUR CHAIRMAN

At The Smith Family, our commitment to supporting young Australians in need through education is both inspiring and essential. As a Board, we are deeply proud of the work our team members do every day to bring this commitment to life – and we recognise that maintaining the highest standards of integrity is fundamental to that impact.

This Code of Conduct is a cornerstone of our governance framework. It reflects our shared values and sets out clear expectations for how we work, make decisions, and interact – with each other and the communities we serve. It is more than a document; it is a living commitment to ethical behaviour, transparency, and accountability across all levels of the organisation.

We are committed to ensuring that this Code is upheld consistently and reviewed regularly to reflect evolving best practices, legal obligations, and the changing environment in which we operate. We expect every team member, volunteer and partner – to understand and apply the principles within this Code, and to speak up when they think something isn't right.

Trust is the foundation of our relationships – with families, donors, partners, and each other. Upholding this Code helps protect that trust and ensures that The Smith Family remains a safe, inclusive, and values-driven organisation.

On behalf of the Board, thank you for your ongoing commitment to our mission and for the integrity you bring to your work every day.

Nicholas Moore
Chairman
The Smith Family

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A MESSAGE FROM OUR CEO



"Speaking up is a sign of strength, and we are committed to ensuring a safe, inclusive, and respectful workplace for all."

Doug Taylor
Chief Executive Officer
The Smith Family

Every decision we make and every action we take contributes to a greater purpose: creating opportunities for young Australians in need by supporting their education journey. This mission is at the heart of everything we do.

Our Code of Conduct is more than a set of rules – it's a reflection of who we are and what we stand for. It embodies our values of respect, integrity, collaboration, innovation, and excellence. The Code guides how we work together, serve our communities and uphold the trust placed in us by families, partners and donors, and each other.

We operate in a complex and ever-changing environment. That's why it's essential we make decisions which aren't just based on what we can do, but what we should do. The "Should We?" test helps us navigate uncertainty with integrity and care, ensuring our actions align with our values and responsibilities.

As CEO, I am personally committed to fostering a culture of ethical leadership and accountability. I encourage every team member, whether you're new to The Smith Family or have been with us for years, to read this Code carefully, reflect on its meaning, and live it every day.

Upholding this Code is not just a compliance requirement; it's a shared responsibility that strengthens our organisation and deepens our impact.

We are here to support you. If you ever face uncertainty or need guidance, please reach out, there are resources and people ready to help. Speaking up is a sign of strength, and we are committed to ensuring a safe, inclusive, and respectful workplace for all.

Thank you for bringing our values to life in everything you do. Your commitment to ethical conduct ensures continued confidence in our work and governance, which lays the foundation for our ambition of empowering young Australians experiencing disadvantage to create a better future for themselves.



Doug Taylor
Chief Executive Officer
The Smith Family

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INTRODUCTION

Why this Code matters

Our Code of Conduct is a policy and a roadmap for acceptable and responsible behaviour. It sets out the standards we expect from everyone who represents our organisation, including team members, volunteers, contractors, and Board members. It helps us make decisions that reflect our values, comply with laws and policies, and protect the trust placed in us by the communities we serve.

This Code provides clarity on what it means to act ethically, respectfully, and responsibly in all situations. It supports a culture of integrity and accountability, helping to prevent legal and compliance issues by ensuring everyone understands the rules, expectations, and consequences of misconduct. By following this Code, we safeguard our reputation, and create a safe, inclusive, and values-driven workplace.

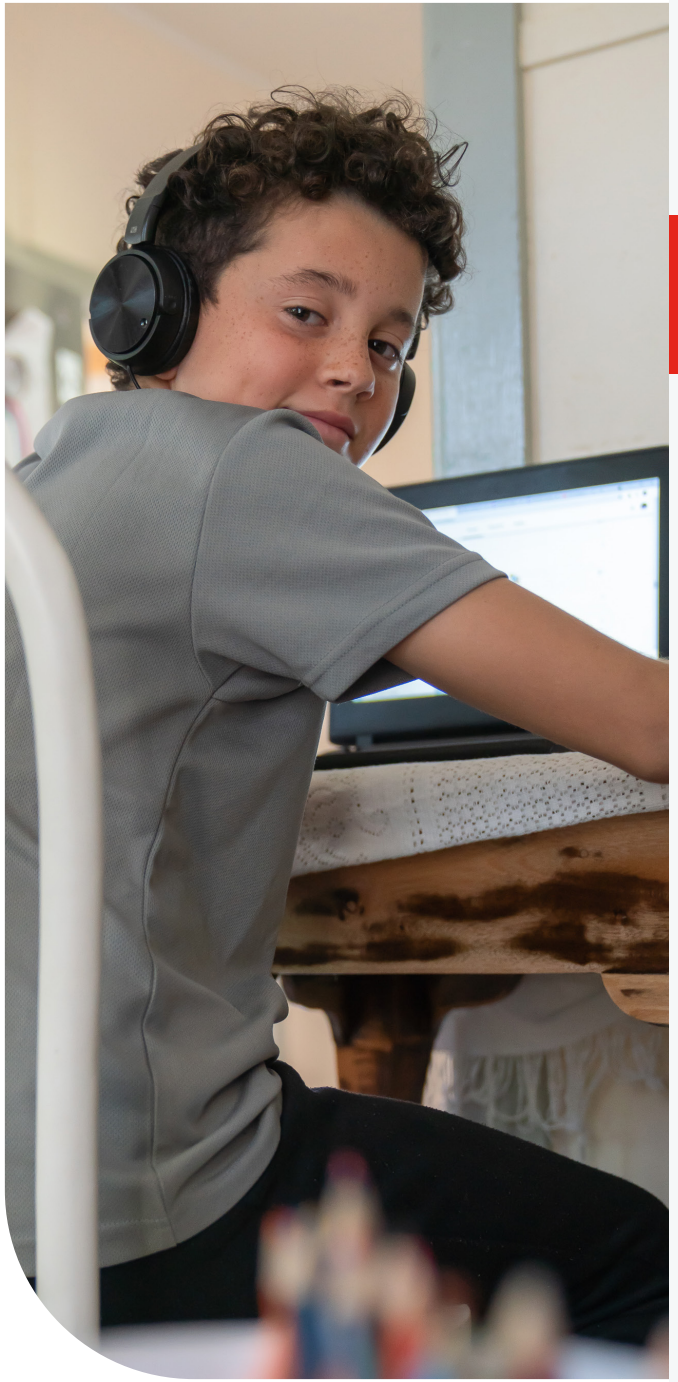
Purpose

This Code defines how we work together and sets expectations for behaviour, decision-making, and accountability. It supports our values, aligns with our risk appetite, and ensures we operate ethically, lawfully, and responsibly. All behaviours and decisions outlined in this Code must align with TSF's charitable purpose and commitment to delivering public benefit.

Scope

This Code applies to:

- All team members, volunteers, contractors, and Board members.
- All locations and contexts where TSF is represented, including remote work, events, travel, and online platforms.
- All interactions with children, families, communities, partners, suppliers, and each other.



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OUR VALUES PROMISE

Living out our values through our behaviours

RESPECT
We are caring



- We show empathy and consideration for others
- We listen actively to others We build and maintain positive working relationships
- We encourage and support others to have a voice
- We seek to understand different points of view
- We value and celebrate all forms of diversity.

INTEGRITY
We are ethical



- We are honest, open and transparent in our interactions with others
- We uphold high ethical standards especially in difficult situations
- We do what we say we will do
- We ensure that confidential information remains confidential
- We treat others fairly
- We demonstrate behaviour that embodies desired culture and values.

COLLABORATION
We work together



- We promote and celebrate the work of others
- We work effectively and inclusively with others to capitalise on opportunities which enhance work
- We demonstrate flexibility in our approach to work and others
- We work with others to resolve problems in the workplace
- We collaborate across teams and functions by sharing knowledge, resources and expertise
- We take a shared responsibility for delivering outcomes which contribute to the achievement of organisational goals.



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OUR VALUES PROMISE

INNOVATION

We are dynamic



- We challenge current practice by suggesting improvements that will increase effectiveness
- We are willing to explore creative solutions to problems
- We look for fresh insights from diverse sources to enhance outcomes
- We are willing to view situations from a different perspective and take action
- We embrace change and see it as an opportunity to be better
- We see mistakes as learning opportunities.

EXCELLENCE

We strive for quality



- We understand how individual performance links to organisational goals
- We plan and prioritise work effectively to ensure goals are achieved
- We reflect on and evaluate our own performance
- We seek feedback and act on it to learn and improve performance when appropriate
- We are accountable for own actions and outcomes
- We demonstrate perseverance and resilience in working towards goals.

Living our values means more than good intentions, it requires action including:

- Complying with all relevant laws, regulations, and TSF policies.
- Understanding and applying the policies and standards outlined in this Code.
- Reporting unethical, unsafe, non-compliant or unlawful behaviour when we see it.

Living our values is not optional. It means taking responsibility for our actions and speaking up when something doesn't feel right. If you're unsure whether something aligns with our values seek guidance from your Leader or People & Culture.

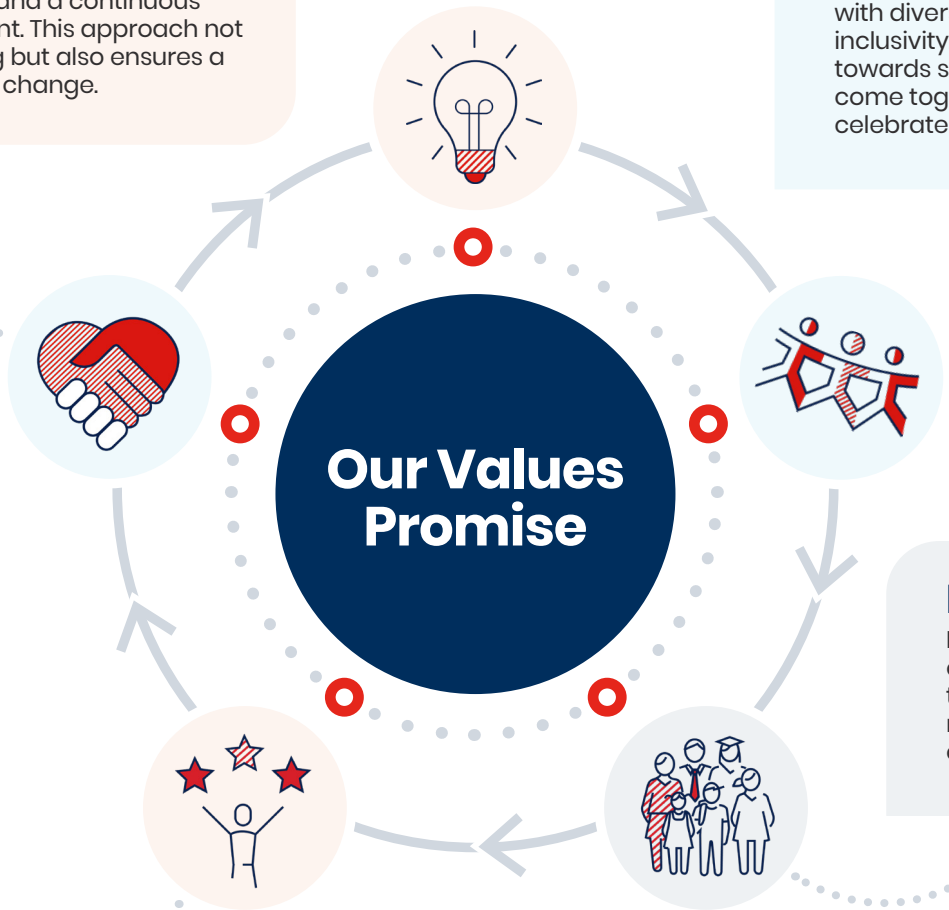
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Innovation

Innovation means we actively seek creative solutions by drawing inspiration from diverse sources, and approaching challenges with a willingness to explore different perspectives. With a growth mindset, we see setbacks as opportunities to learn, fostering resilience and a continuous commitment to improvement. This approach not only fuels innovative thinking but also ensures a proactive engagement with change.

Collaboration

Collaboration is working with those who value and uplift the work of others; working together with diverse talents, embracing flexibility and inclusivity. Together, we navigate challenges, towards shared success. In our workplace, we come together to achieve common goals and celebrate and promote the success of others.



Respect

Respect is a fundamental aspect of positive interpersonal relationships, shown through empathy and understanding. It involves supporting others, recognising diverse perspectives, and celebrating differences. Respect fosters collaboration, enhances communication, and contributes to a culture that values and appreciates diversity.

Integrity

Integrity is showing honesty, openness, and high ethics. It's about treating everyone fairly and taking responsibility for our actions, so we can foster a supportive culture.

Excellence

Excellence involves effective planning, prioritisation, and goal achievement while ensuring we link our work to our organisational goals. It requires regular self-reflection, feedback utilisation, and decisive action. Demonstrating perseverance and resilience in the face of challenges is crucial for sustained success and personal growth.

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WHAT THE CODE MEANS FOR YOU

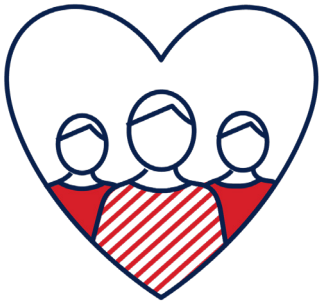
You are expected to:

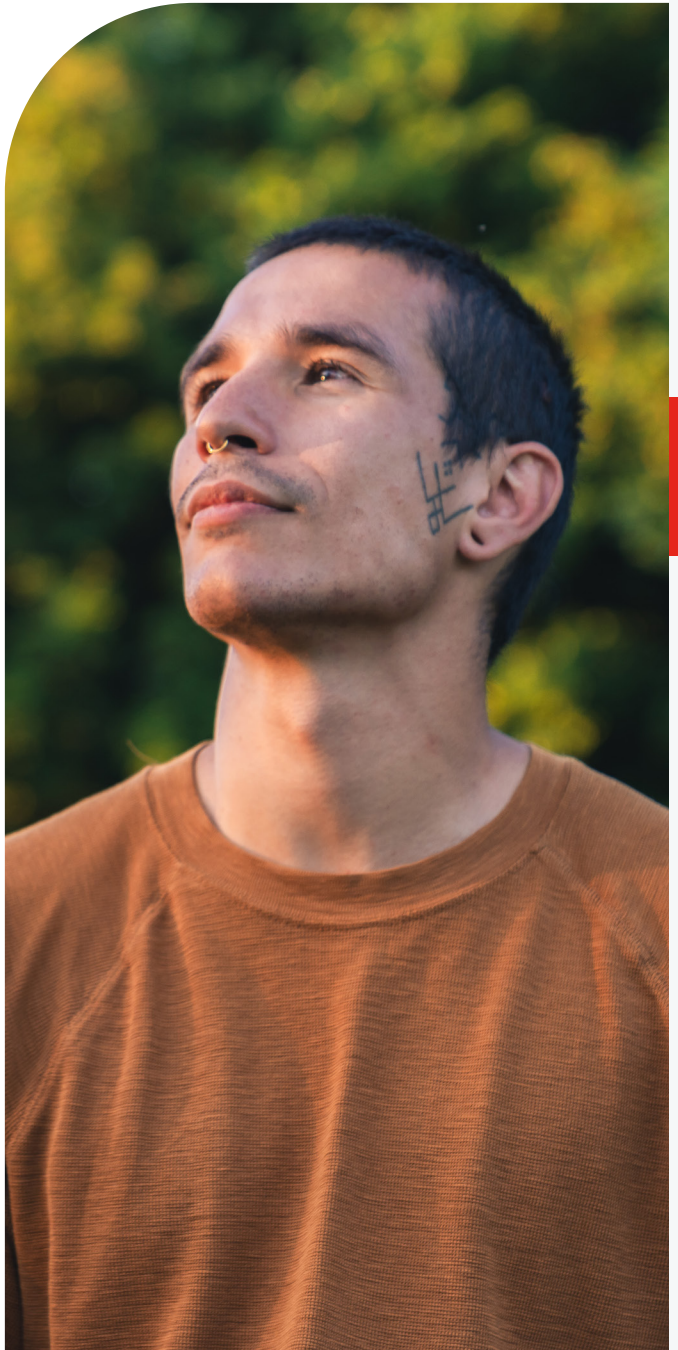
- Understand and comply with this Code and all relevant TSF policies.
- Use the “Should We?” test to guide ethical decision-making.
- Complete all mandatory training and annual refresher compliance training, and for some team members completing an annual compliance attestation.
- Speak up if something doesn’t feel right, or if you have any concerns.
- Learn from mistakes, share lessons, and seek guidance when unsure.
- Act as a role model for TSF’s values in all interactions.
- Take care of your own health and safety as well as that of others.
- If you are unclear about your responsibilities, talk with your Leader.

You can expect from TSF:

- Clear and consistent expectations that all must follow and consequences for those who do not.
- Safe ways to raise concerns.
- Help navigating complex situations.
- Protection from retaliation when you speak up.

Accountability is a shared responsibility. Whether you are a team member, volunteer, contractor, Leader, or Board member, you are expected to uphold this Code and model our values in every interaction. Ethical conduct is not just a personal standard; it’s an organisational commitment. Everyone at TSF is responsible for understanding the rules, making ethical decisions, and speaking up when something isn’t right.





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WHAT THE CODE MEANS FOR LEADERS



Leaders play a critical role in shaping our culture and driving ethical behaviour across the organisation. With this influence comes a heightened level of accountability, not only for their own actions, but for the team environments they create and the standards they uphold. Leaders and Board members must meet the applicable Australian Charities and Not-for-profits Commission (ACNC) suitability requirements and demonstrate ongoing integrity and accountability.

Leaders are expected to:

- **Consistently embody TSF values**, setting the tone for what is acceptable and expected.
- **Own their decisions and outcomes**, including the impact on people, performance, and culture.
- **Be accountable for team performance and conduct**, provide clarity on priorities, manage roadblocks, proactively address risks and issues.
- **Ensure that volunteers and contractors** under their leadership understand and comply with this Code of Conduct.
- **Make informed, fair, and consistent decisions**, guided by our values and policies.
- **Create safe spaces for open, respectful conversations**, where all people contribute, feel heard and valued.
- **Support team member development and growth**, providing and encouraging ongoing balanced feedback, fostering capability and confidence.
- **Uphold all policies, legal obligations, and regulatory requirements**, ensure their teams do the same, and escalate issues where they are not met.
- **Act with care and diligence**, in good faith, and in the best interests of TSF. They must avoid conflicts of interest and never misuse their position or information.
- **Respond promptly and fairly to concerns and misconduct**, recognising and taking action and following through where there are issues.

Accountability starts at the top. Leaders must actively apply the Code, embed values in everyday decision-making, and ensure their teams operate with integrity. Leadership is not just about influence, it's about responsibility, consistency, and courage to do what's right.

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MAKING ETHICAL DECISIONS: THE "SHOULD WE?" TEST

When faced with a decision, ask:

- Is it the right thing for the children, families, and communities we support?
- Does it align with our values and policies?
- Is it fair, respectful, and inclusive?
- Would I feel comfortable explaining it to my Leader, family, or the media?

If unsure, stop and seek advice from your Leader, People & Culture, or Risk & Compliance.



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CONDUCT EXPECTATIONS

Supporting our people

What it means for you

We're committed to a safe, inclusive, and respectful workplace. You're expected to treat others with dignity and fairness, speak up against discrimination or harassment, and help foster psychological safety. You are also responsible for respecting personal boundaries, cultural identities, and promoting diversity, equity, and inclusion in all aspects of your work. TSF is a drug and alcohol-free environment; if prescribed medication may affect your performance, let your Leader know so risks can be managed.

How you make an impact

You make a positive impact by listening actively, communicating respectfully, and supporting your colleagues. You challenge and/or escalate inappropriate behaviour when you see it and encourage others to do the same. You help build a culture of care by reporting concerns early and constructively, and by creating an environment where everyone feels safe, valued, and empowered to contribute.

Key Policies

- Discrimination, Bullying and Harassment Policy
- Gender Affirmation Policy
- Grievance Policy
- Health, Safety and Wellbeing Policy
- Whistleblowing Policy.

Ethical conduct and business integrity

What it means for you

We expect you to act with integrity, follow applicable Australian laws and policies, and use TSF resources responsibly. This includes protecting confidential information, avoiding conflicts of interest, and complying with lawful directions from management. Your conduct, online and offline, should reflect TSF's values and protect our reputation.

You must not misuse your position or organisational information, and personal political views must not be presented as those of TSF. Gifts under $100 may be accepted if they don't influence decisions; anything more should be declined or escalated. External work or voluntary activities must not conflict with your TSF role, and any potential conflicts should be disclosed.

Only authorised spokespeople may comment publicly or on social media on behalf of TSF. Use sound judgment in personal online activity and avoid content that could harm TSF's reputation.

How you make an impact

You work with integrity by making fair, transparent decisions and following lawful directions. You protect TSF's reputation by acting professionally, online and offline, and using organisational resources responsibly. You stay informed, make complying with TSF policies part of how you work day-to-day, comply with applicable Australian laws, manage conflicts of interest, and speak up when something doesn't feel right, helping build a culture of trust and accountability.

Key Policies

- Acceptable Use of GenAI
- Conflicts of Interest Policy
- Delegation of Authorities Policy
- Information Asset Classification Policy
- Privacy Guideline and Policy
- Procurement Policy and Guidelines
- Records Management Policy
- Risk Incident and Issues Management Policy
- Social Media Policy
- TSF Acceptable Use Policy
- Whistleblowing Policy.

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CONDUCT EXPECTATIONS

Fair and rewarding workplace

What it means for you

You play a vital role in shaping a workplace where growth, feedback, and continuous learning are part of everyday life. You're encouraged to actively participate in performance and development conversations, embrace feedback, and seek opportunities to improve, not just for yourself, but for your team and the organisation.

Creating a high-performing culture means aligning individual goals with team and organisational strategic priorities. It also means being open to learning, adapting, and contributing to a shared vision of excellence. When expectations aren't met, constructive and respectful performance conversations will be initiated to support improvement, with further steps taken if necessary.

How you make an impact

You help build a culture where people feel recognised, supported, and empowered to grow. You engage in honest and forward-looking conversations about performance, development, and career progression. You give and receive feedback with professionalism and care, and you help others succeed by sharing knowledge, celebrating progress, and learning from setbacks.

Your commitment to growth and accountability strengthens our collective impact and helps ensure that every team member feels valued and equipped to thrive.

Key Policies

- Flexible Working Policy
- Grievance Policy
- Leave Policy
- Managing Under Performance Policy
- People & Culture Policy
- Whistleblowing Policy.

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CONDUCT EXPECTATIONS

Helping our communities

What it means for you

You are expected to engage with children, families, and communities with empathy, fairness, and professionalism. This means treating everyone with compassion and dignity, promoting empowerment and inclusion, and avoiding any behaviour that could be perceived as favouritism, exploitation, or misconduct. You must build trust through ethical partnerships and ensure that your actions reflect TSF's commitment to social impact and community wellbeing.

You are expected to always act in the best interests of children and young people, create and maintain safe environments, and take appropriate action to protect children and other vulnerable people from abuse and neglect. Upholding these responsibilities includes understanding and following TSF's Child Safeguarding Framework in all relevant situations.

How you make an impact

You make a difference by listening to and understanding the needs of the communities we serve. You act with integrity in all community interactions and represent TSF with professionalism and care. You support inclusive practices and help deliver programs that are meaningful, respectful, and impactful. You build relationships based on trust, transparency, and shared purpose, while always prioritising the safety and wellbeing of children and young people.

Key Policies

- Child Safeguarding Framework
- Donations Acceptance and Refusal Policy.

Professional appearance

What it means for you

You are expected to dress in a way that reflects TSF's values and is appropriate to your role, location, and work environment. While TSF does not prescribe a uniform, attire should be professional, respectful, and suitable for the nature of your work. Clothing must not cause offence or compromise safety, and in some settings, specific dress requirements may apply due to operational or personal/medical needs.



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SPEAKING UP AND REPORTING CONCERNS

At the heart of TSF's values is doing what's right, even when it's hard. To uphold the standards we believe in, it's important that we notice and act when something doesn't feel right. We encourage everyone to speak up if they see or experience behaviour that doesn't align with our values. Whether the concern seems small or serious, raising concerns helps protect the integrity of our organisation. Misconduct, in any form, should never be ignored.

Everyone has a role to play in maintaining our standards. Accountability extends to our members, donors, and communities. Speaking up protects the integrity of our mission and ensures transparency in how we operate. Speaking up is not just encouraged, it's a vital part of who we are.

We all have a responsibility to speak up. You can:

- Talk to your Leader or a Senior Leader
- Contact People & Culture or Risk & Compliance
- Use formal reporting channels, such as Whistleblowing channel Elker
- Be protected from retaliation and supported throughout the process (as described in the Grievance Policy and the Whistleblowing Policy), as applicable
- Make a whistleblowing disclosure to an Eligible Recipient (see Whistleblowing Policy).





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CONSEQUENCES OF BREACH

Breaching this Code of Conduct can have serious consequences. All concerns will be assessed fairly and confidentially, and appropriate action will be taken based on the nature and severity of the breach.

Breach examples	Possible outcomes
• Failure to uphold TSF values • Misuse of confidential information • Bullying or harassment • Failure to comply with safety procedures • Conflict of interest not disclosed • Non-compliance with laws or policies • Failure to complete mandatory compliance training or refresher training • Failure to complete mandatory regular screening activities (i.e. working with children checks, etc.)	• Disciplinary action • Investigation and formal warning • Mandatory retraining or coaching • Termination of employment or engagement • Legal or regulatory reporting • Loss of access to TSF systems or resources • Reputational damage to the individual and TSF

We are committed to handling breaches with fairness, transparency, and care. Speaking up early helps prevent harm and supports a culture of accountability.

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POLICY DOCUMENT INFORMATION

Policy Details	
Policy Name	Code of Conduct
Policy Approver	Board
Policy Owner	Anita Denvir, Group Manager, People Partnering
Date of Approval	February 2026
Effective Date	February 2026
Review Frequency	Annually
Date of Next Review and Approval	November 2026
Date of last update	October 2025

Version No.	Version Date	Details	Reviewed/ Amended By	Approved By	Approval Date
1.0	11 April 2018	Major update of all content	Christina Constantine Lauren Stocker	Annette Young, Head of People & Culture	11 April 2018
2.0	November 2025	Major update	Catherine Kearney, National Manager, Risk and Compliance	TSF Board	

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