



Code of Conduct
Governance



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Author Title & Issuing Department	Company Secretary Governance, Risk and Assurance
Target Audience	All employees, Board and Committee Members, Trustees and involved residents of all organisations within emh Group and were appropriate Contractors working on behalf of emh Group

Approved By	Emh Group Board
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Review Date	18 th September 2029

Links to Regulatory Standards – Economic/ Consumer Standards	NHF Code of Governance 2020 NHF Code of Conduct 2026 RSH Governance & Financial Viability Standard RSH Competence and Conduct Standard
Outcomes for Customers	To ensure that Boards, Committees, Trustees, employees and involved residents consider the voice of its residents in everything it does
How were tenants, residents and service users involved in the review/development of this document	Involved Residents were consulted on the draft of this Code of Conduct and the attached Probity Policy Resident Influence Committee reviewed the draft of this Code of Conduct and the attached Probity Policy at its meeting in August 2026.
Training Provision	emh Learn mandatory training provision
Links to the Business Plan	4.5 Business & Financial resilience What Matters Framework including Performance and Talent Conversations
Links to Key Values	Integrity – ensuring we maintain the highest ethical standards. Accountability- being accountable to our customers and stakeholders Openness – Being open and transparent in all areas of the business.

Version Control

Version	Revision Date	Author: Job Title	Change Description
V1	September 2026	Company Secretary	New Code of Conduct to align with the Probity Policy, emh Values and the What Matters Framework and based on the NHF Code of Conduct 2026



Introduction

Why do we have a Code of Conduct?

It is vital that everyone who works for or represents emh Group is held to the highest standards of conduct. This protects residents, emh Group, and the reputation of the social housing sector.

This code has been adapted from the National Housing Federation (NHF) Code of Conduct 2026 and applies to individual employees, board members, Trustees and involved residents of all organisations within emh Group and, where indicated to contractors working on behalf of emh.

What is the Code of Conduct?

Simply described, the Code of Conduct sets out the behaviours, or standards of conduct, that are expected of people who are involved in the work or decision-making of emh Group. The code does not prevent anyone from exercising their rights, and in fact encourages them to do so. This includes the right of residents to make complaints and the right of all involved to use the whistleblowing procedure.

How does it fit with other Policies and Procedures?

This Code of Conduct forms part of the Probity Suite, which consists of

- The Probity Policy
- This Code of Conduct
- The Whistleblowing Policy

All documents within the Probity Suite are available on the [emh Website](#) and within the Governance section of [emh Central \(Intranet\)](#)

Our Values and the What Matters Framework

This Code of Conduct is underpinned by emh's Values and the What Matters Framework. Together, they define the standards, behaviours and culture expected of everyone who works for, represents or supports emh Group.

Our values of Integrity, Diversity, Openness, Accountability, Clarity and Excellence provide the foundation for how we make decisions, conduct ourselves and deliver services. They reflect the culture we want to create and the experience we want residents, customers, colleagues and partners to have when they interact with emh.





This Code translates those values into clear expectations and standards of conduct, ensuring that everyone associated with emh acts ethically, responsibly and in the best interests of residents and emh. It provides a practical framework for making decisions, managing relationships, taking accountability for actions and maintaining public trust and confidence.

The What Matters Framework builds on our values by describing the everyday behaviours that bring them to life. It captures both what we do and how we do it, helping to create positive experiences for residents, customers, colleagues and stakeholders. While the Code sets out the standards that must be met, the What Matters Framework helps individuals understand how those standards should be demonstrated in day-to-day interactions and decision-making.



Together, emh's values, the What Matters Framework and this Code of Conduct provide a consistent foundation for behaviour across the Group.

Who does the Code apply to?

Board and Committee Members and Trustees

The Code of Conduct sits alongside the NHF Code of Governance and the emh Probity Policy and sets out the standards of conduct required of Board Members and Trustees. This also includes any Independent Members of Committees.

Involved residents

The code is intended to apply to residents who have a formal role in emh Group's governance, scrutiny or decision-making arrangements, such as Resident Influence Committee and Scrutiny Panel members.

Employees

The code is designed to address the standards of behaviour that should be expected from every employee. It sets out expectations for employees conduct in fulfilling their roles. This includes how individuals should behave towards residents.

Contractors

Where indicated the code applies to contractors acting on behalf of emh.

How the Code is Structured

There are five parts to the code:

1. **Acting in the best interests of residents and emh Group.**
You have a responsibility to carry out your role in a way that supports the long-term interests of current and future residents and in line with the purposes and values of emh Group.
2. **Behaving with integrity**
By integrity, we mean that you must act honestly, transparently and in line with the highest standards of ethical conduct. The reputation and good name of emh Group depends on compliance with this code, and with the laws, policies and procedures that it refers to.
3. **Treating others fairly, with respect and empathy**
The way in which people behave towards each other is fundamentally important to the experience of residents and employees of emh Group. Respectful, fair and empathetic behaviour is essential to building trust, maintaining effective relationships and supporting a healthy organisational culture.
4. **Taking responsibility for the impact of your actions**
You have a responsibility while on emh Group's business to consider the immediate and longer-term impact of your actions and to be accountable for them.
5. **Acting with diligence and care**
The diligence and care with which roles are performed has a significant impact upon the quality of decision-making and services, and on the experience of residents and employees. This includes taking responsibility for your own performance and for meeting relevant professional standards.

Each part of the code comprises a set of principles and detailed expectations. Where requirements apply differently to different groups (Board and Committee Members and Trustees, involved residents and employees), we use subheadings within the relevant section to distinguish them. These headings are marked with a colour-coded **BM** (board member), **E** (employee), **IR** (involved resident) **C** (Contractors).

1. Acting in the best interests of residents and emh Group

You have a responsibility to carry out your role in a way that supports the long-term interests of current and future residents and is in line with the purposes and values of emh Group.

A. Meeting your responsibilities

The principle

You must act in good faith, putting aside personal gain and making decisions that support the long-term interests of residents as a whole and are in the best interests of emh Group.

Expected of all **BM E IR C**

- A1** You must always try to fulfil the requirements of your role to the best of your ability. If any circumstances arise that limit your ability to meet your responsibilities, you must raise this through the appropriate channels.
- A2** In carrying out your role, you must always seek to further emh Group's strategic objectives, reflecting emh Group's desired culture.
- A3** You must not act in a way that discriminates against, or unfairly favours, particular individuals, groups or interests, including on the basis of any protected characteristics they may have.
- A4** You must consider the impact of your actions on the safety and wellbeing of residents.

Expected of Board Members and Involved Residents **BM IR**

- A5** You must respect and take responsibility for decisions that are made by the group(s) of which you are a member, even if you do not personally agree with them.

Expected of Employees **E**

- A6** You must consult your manager before taking any other paid or voluntary work that may interfere with your ability to act in line with emh Group's purpose, or conflict with the terms set out in your contract of employment.



B. Representing emh Group

The principle

In representing emh Group in any capacity, including at external events, in dealings with outside bodies and on social media, you are an ambassador for emh Group and must uphold and promote its values, objectives and policies.

Expected of all **BM E IR C**

- B1** In representing emh Group, you must act in accordance with its values, policies and goals.
- B2** You must not conduct yourself in a manner that could reasonably be regarded as bringing emh Group into disrepute through dishonest, misleading or inappropriate behaviour.
- B3** You must not make knowingly false, malicious or misleading statements about emh Group or those connected with it.
- B4** You must not seek to officially represent the views or position of emh Group unless authorised to do so.
- B5** When representing emh Group through any medium, including social media, you must at all times act with professionalism.
- B6** Where any personal social media accounts refer to your role with emh Group, you must make it clear in what capacity you are communicating

Expected of Board Members and Employees **BM E**

- B7** If you intend to engage in an activity, including political or campaigning activity, which may reasonably be regarded to affect emh Group, you must obtain appropriate prior consent from emh Group. Such consent must not be unreasonably withheld unless your activity poses a material risk to emh Group.

2. Behaving with integrity

By integrity, we mean that you must act honestly, transparently and in line with the highest standards of ethical conduct. The reputation and good name of emh Group depend on compliance with this code, and with the laws, policies and procedures that it refers to.

C. Conflicts of interest

The principle

You must take all reasonable steps to make sure that no conflict arises, or could reasonably be perceived to arise, between your duties to emh Group and your personal interests, other duties and relationships.

Expected of all **BM E IR C**

- C1** You must formally declare to emh Group, at the earliest opportunity, any interests, roles and relationships that could - or could reasonably be perceived to - affect your ability to act in the best interests of residents as a whole and of emh Group; you must make sure that these interests do not interfere with your ability to carry out your role effectively.
- C2** You must declare any known relationship to a resident, potential resident or other customer of emh Group where this could reasonably be perceived to influence your role. You must not be involved in decisions relating to their relationship with emh Group or seek or accept preferential treatment for them.
- C3** You must declare any known relationship to an employee, Board Member or Trustee where this could reasonably be perceived to influence your role. You must not be involved in decisions relating to their relationship with emh Group or seek or accept preferential treatment for them.
- C4** You must declare any known relationship to a person or organisation seeking appointment as a contractor or supplier to emh Group and must not be involved in their appointment, performance management or reward.
- C5** Except where specifically permitted, as set out in emh Group's relevant policy, you must avoid using its contractors and suppliers for private purposes.
- C6** You must not use, or attempt to use, your position to secure personal benefit or advantage for yourself or any connected person, business or organisation.

- C7** You must not seek to influence decisions improperly, including by applying pressure, offering inducements, or using personal relationships to secure preferential outcomes.

Expected of Board Members and Employees BM E

- C8** You must declare any known relationship to a person applying for or performing a role within emh Group and must not be involved in their appointment, performance management or reward.

Expected of Board Members and Involved Residents BM IR

- C9** You must be clear about the role you are acting in and must not use your position to influence individual service decisions or treatment for yourself or others.
- C10** You must act independently and fairly, avoiding involvement in individual operational matters unless this is part of an agreed role.
- C11** Individuals with a conflict should not take part in discussions and decisions relating to that conflict and should be prepared to take all reasonable steps to address the conflict. These should include being willing to resign if the conflict is material or long-standing and, in the opinion of the relevant board, committee or other group, cannot be managed appropriately.
- C12** For residents, a conflict could include a matter being discussed that relates specifically to the individual's home. It should not prevent residents taking part in discussions about matters that affect larger groups of residents.

Expected of Involved Residents IR

- C13** You must not be involved in any recruitment or selection process where you have a close connection with a person applying for the role.



D. Bribery, gifts and hospitality

The principle

In your role with emh Group, you must not allow gifts, hospitality or other benefits to influence, or be perceived to influence, your judgement or behaviour.

Expected of all BM E IR C

- D1** You must not seek or accept preferential treatment in the provision of benefits such as employment or housing accommodation.
- D2** You must not solicit or seek gifts or hospitality or other benefits in connection with your role.
- D3** Any gifts or hospitality offered to or by you must be either declared or declined in accordance with the Probity Policy.
- D4** If you are offered a bribe, hospitality or a gift, which is or may be in return for expected preferential treatment, you must decline and declare this immediately to your line manager and the Company Secretary.

Expected of Involved Residents IR

- D5** You must not seek or accept preferential treatment in the provision of housing or related services.



E. Funds, resources and personal benefit

The principle

You must use emh Group's funds, resources and assets responsibly, transparently and only for proper purposes.

Expected of all (excluding Contractors) BM E IR

- E1** You must ensure that emh Group's funds and resources are used properly and efficiently.
- E2** Your procurement decisions must be guided by emh Group's policies and fairness in decision-making and in line with relevant law.
- E3** You must take all reasonable measures to protect emh Group's funds, resources, property and assets from fraud, theft, damage and misuse.
- E4** If you claim reimbursement for any expenses, you must do so in line with emh Group's policies and procedures.

Expected of Board Members BM

- E5** If you are making decisions about litigation, you must ensure that funds and resources are used properly and efficiently with consideration of financial, operational and reputational risk.

F. Confidentiality

The principle

You must handle information that is provided to you in your role responsibly and lawfully, balancing confidentiality, commercial sensitivity and legal obligations with openness, transparency and accountability.

Expected of all **BM E IR C**

- F1** You must not disclose, without the required permission and authority, any personal data about residents, employees or colleagues. This duty continues to apply after you have left emh Group or stepped down from your position.
- F2** You must not disclose, without authority, any confidential or sensitive business information. This duty continues to apply after you have left emh Group or stepped down from your position.
- F3** You must not, without authority, pass or distribute to the press or media or any other external recipient any unpublished information or materials relating to emh Group, unless you are doing so in accordance with emh Group's whistleblowing policy and procedure.
- F4** You must not prevent another person from gaining access to information to which they are entitled by law and should support transparency where appropriate.

G. Working with residents

The principle

You must act fairly and properly in your dealings with residents, including listening to their views and being accountable for your actions.

Expected of all **BM E IR C**

- G1** You must seek and value views from residents when making decisions that will affect them.
- G2** You must not allow any personal relationship with a resident to influence how you discharge your role and responsibilities.
- G3** You must not give personal gifts or loans of money to, or receive personal loans or gifts of money (including will bequests) from, residents.
- G4** You must handle residents' money only where absolutely necessary and ensure that a receipt is completed for every transaction. In any event, you must operate in accordance with emh Group's financial policies, procedures and controls to ensure appropriate handling of any and all funds.
- G5** You must not invite or influence a resident to make a will or trust under which you are named as executor, trustee or beneficiary.

Expected of Employees, Board Members and Contractors **BM E C**

- G6** You must maintain appropriate boundaries with employees, colleagues and residents and must not allow personal relationships to influence how you carry out your role.

Expected of Involved Residents **IR**

- G7** When you advocate for issues, concerns or experiences raised by residents or communities, you must do so honestly and without seeking unfair advantage or preferential treatment.

H. Reporting concerns

The principle

You must report to the Company Secretary any reasonable suspicions you have about possible wrongdoing in line with this code or emh Group's relevant policies and procedures.

Expected of all BM E IR C

- H1** If you have a concern about possible wrongdoing, you must immediately report it via the appropriate internal channel or external body. This includes becoming aware of potentially dishonest or fraudulent activity, and material breaches of this code or relevant legislation, including health and safety.
- H2** If you believe that you are being required to act in a way which conflicts with this code or legislation, you must immediately report it via the appropriate channel.
- H3** You must not victimise, disadvantage or treat unfairly anyone who raises a concern, makes a complaint, or uses whistleblowing or reporting procedures in good faith.

3. Treating others fairly, with respect and empathy

The way in which people behave towards each other is fundamentally important to the experience of residents and employees of emh Group. Respectful, fair and empathetic behaviour is essential to building trust, maintaining effective relationships and supporting a healthy organisational culture.

1. Fairness, respect and empathy

The principle

You must treat all others with fairness, respect and empathy, regardless of role, status or circumstances. You must recognise where you have power and authority in your role and use this in a way that is responsible and, where possible, empowers other people.

Expected of all **BM E IR C**

- I1** You must treat everyone you engage with through your role with respect, politeness, consideration and empathy.
- I2** You must respect individuals' chosen identities, backgrounds, protected characteristics and lived experiences, and avoid making assumptions about others.
- I3** You must act in ways that contribute to an inclusive environment, where people feel fairly treated, respected and listened to and where they feel able to raise concerns.
- I4** You must not harass, bully, intimidate or discriminate against others, or engage in behaviour, including subtle or repeated behaviours, that could reasonably make others feel marginalised, threatened, patronised or dismissed.
- I5** You must not display materials in an emh Group workplace or use language in the performance of your role which other people might reasonably find offensive. This includes having such material on display or visible in the background when working from home.
- I6** You must report through appropriate channels any instances of unfair or unequal treatment associated with emh Group and, where it is your role to do so, you must investigate any such reports thoroughly, with compassion and respecting confidentiality.



Expected of Employees and Contractors E C

- I7** If your role includes working in residents' homes, you must behave respectfully and with care, recognising that you are entering someone's home. This includes respect for people's privacy, preferences and personal property.

J. Professional relationships

The principle

Board members, employees and involved residents must maintain constructive, professional relationships with each other, based on a sound understanding of their respective roles.

Expected of all BM E IR C

- J1** You must not ask or encourage anyone to commit wrongdoing, including any breach of this code.
- J2** You must behave in a professional manner appropriate to your role, always maintaining independence and integrity. You must conduct relationships with other people who hold roles at emh Group (whether involved residents, board members or employees) on an appropriately professional footing.
- J3** You must challenge language or behaviours that reinforce stigma about residents or social housing.
- J4** You must welcome constructive challenge and respectful disagreement from others and offer challenge to others in a constructive and respectful way.

Expected of Board Members BM

- J5** Your relationships with employees and residents must be constructive and professional.
- J6** You must set an example by demonstrating the highest standards of honesty and ethics and your alignment with the values, policies and objectives of emh Group.



Expected of Board Members and Involved Residents BM IR

- J7** Where it is necessary to raise issues of employee, board or contractor performance, these must be raised constructively and through the appropriate channels.
- J8** Unless you have specific and, where practicable, written delegated authority to do so, you must not individually give instruction or direction to any employee or contractor.

Expected of Employees E

- J9** You must avoid, in a professional setting, inappropriate personal familiarity with board members and involved residents.
- J10** You must not use informal channels to lobby or influence board members or involved residents on matters of emh Group's business.
- J11** You must not knowingly mislead the board or any of emh Group's committees or panels. In presenting information, you must set out the facts and relevant issues and risks truthfully.

4. Taking responsibility for the impact of your actions

You have a responsibility while on emh Group's business to consider the immediate and longer-term impact of your actions and to be accountable for them.

K. Resident experience

The principle

You must anticipate and take responsibility for the impact that your conduct, actions and decisions may have on residents.

Expected of Employees and Contractors **E C**

- K1** You must consider how your conduct, actions and decisions may impact on residents.
- K2** You must be prepared and able to offer residents a clear explanation for actions or decisions you take, especially where these directly affect them.
- K3** You must respond constructively to feedback about your actions, decisions and performance, by whoever this is provided.

L. Health, safety and wellbeing

The principle

Your conduct, actions and decision-making must promote the health, safety, security and wellbeing of yourself or others.

Expected of all **BM E IR C**

- L1** You must not knowingly put your own or others' health, safety, security or wellbeing unnecessarily at risk. When you take actions and make decisions, you must consider the impact your action or decision may have on the safety and wellbeing of others.
- L2** If you have any concerns about the health, safety, security or wellbeing of yourself, another individual or a group of individuals connected with emh Group, you must report this immediately through the appropriate channels.

M. Environment and sustainability

The principle

Within your role at emh Group, you must consider, and try to avoid or reduce, negative impacts on the environment and sustainability.

Expected of all **BM E IR C**

- M1** In carrying out actions or making decisions in the performance of your role, you must consider the environmental impact of your decisions and, where you are able, seek to achieve positive environmental outcomes.
- M2** You must take reasonable steps to reduce unnecessary waste and resource use.

N. Digital and data

The principle

You must ensure that your use of digital systems, data and emerging technologies is responsible and protects residents, colleagues and emh Group itself from harm.

Expected of all **BM E IR C**

- N1** You must take reasonable steps to protect sensitive information from loss, misuse or unauthorised access.
- N2** In carrying out your duties, you must use digital systems, devices and tools only in ways which are formally permitted by emh Group. You must report any suspected data breach, cyber security breach or concern, and any other digital threat or vulnerability immediately, through the appropriate channels.
- N3** In using digital systems, data and emerging technologies within your role, you must take care to avoid use that may be misleading, discriminatory or otherwise inconsistent with emh Group's values and responsibilities.
- N4** You should be transparent and proportionate in any permitted use of artificial intelligence and must take care to maintain human judgement and accountability in such use.

5. Acting with diligence and care

The diligence and care with which roles are performed has a significant impact upon the quality of decision-making and services and the experience of residents and employees. This includes taking responsibility for your own performance and for meeting relevant professional standards.

O. Learning and development

The principle

In partnership with emh Group, you must take responsibility for your own learning and development, regularly updating and refreshing your skills and knowledge.

Expected of all (excluding Contractors) **BM E IR**

- O1** You must play an active part in emh Group's Performance and Talent appraisal processes as they apply to your role.
- O2** You must make personal learning and development needs relevant to your role known to the organisation and must undertake all mandatory training for your role.
- O3** Unless there are exceptional reasons, you must attend learning and development events as required and apply learning to your role.

Expected of Board Members **BM**

- O4** You must keep your knowledge up-to-date in those areas in which you are a specialist, as well as keeping abreast of matters relating to emh Group and the wider sectors within which it operates.

Expected of Employees and Contractors **E C**

- O5** You must take responsibility for your own professional development. Where your role requires continuing professional development (CPD), you must keep this up-to-date and maintain any required records.

P. Acting with care and diligence

The principle

You must act with care and diligence in making sure that you understand your role and its requirements, and that you are equipped to carry out your duties.

Expected of all BM E IR C

- P1** You must take care to understand the responsibilities of your role, including relevant legal, regulatory and policy requirements.
- P2** You should prepare properly for any meetings, decisions and activities where you will be required to contribute views, to scrutinise or to make decisions.
- P3** If you become aware of a problem where action is required, you must not ignore, conceal or minimise the issue.
- P4** In carrying out your role, you should recognise the boundaries of your responsibilities and must escalate issues or risks as needed, particularly where these may impact residents, services, safety or the reputation of the organisation.

Q. Continuous improvement

The principle

You must support a culture of learning and continuous improvement through acting in an open and accountable manner, recognising mistakes and learning from feedback to help emh Group to continue to improve outcomes.

Expected of all BM E IR C

- Q1** You must demonstrate openness to learning from a range of opportunities, including resident scrutiny, complaints and other feedback.
- Q2** You should offer open and constructive feedback to others and invite feedback about your own performance.



Jargon Buster

This brief jargon buster addresses specific words and phrases used in the Code of Conduct.

Board

Includes emh Group Board, emh Homes Board, emh Care and Support Board, Midlands Rural Housing Board, any other Boards within emh Group, any sub-Committees to any of the Boards, and all similar governing bodies however named.

Board and Committee Member or Trustee

Includes all members of governing bodies whether they are formally known as non-executive directors, trustees, board members, committee members, etc. It includes co-optees and any other nominees, whether or not they enjoy voting rights, and all members of sub-committees who are not also members of the main governing body.

Close connections

In broad terms, means your family, relatives, close friends or business partners, as well as businesses in which you have an interest through ownership or influence. The term includes (but is not limited to) your spouse, unmarried partner or civil partner, children, siblings, grandchildren and grandparents. If you are unsure, it is best to err on the side of caution by acknowledging that there may be a close connection and acting accordingly.

Contractors

Includes those other than board members, employees and involved residents who are directly involved in delivering emh Group's business activities. This includes contractors, sub-contractors, consultants and agents.

Culture

Organisational culture can be simply described as 'how we do things around here' – it is the sum total of shared values, attitudes and behaviours that shape how people perform their roles at emh Group and how residents experience the services they receive.

Employees

Includes emh Group's employees and any other persons fulfilling the role of a paid employee, such as those deemed to be workers, interim placements, or those on secondment from another organisation. This includes directly employed operatives working in areas including repairs and maintenance, grounds maintenance, communal cleaning and safety compliance.

**Impact on the environment and sustainability**

This means the effect your actions or decisions may have on the natural environment. This includes climate change, carbon emissions, energy and water use, waste, pollution, biodiversity and the responsible use of resources.

Involved resident

Includes residents and other customers who are formally involved in delivering, or scrutinising, emh Group's business activities.

Known relationship

For the purposes of this code, this means relatives and close connections (see definition above). Relationships with acquaintances i.e. people you know, but not very well, are not covered by this term.

Personal familiarity

For the purposes of this code, this refers to forming relationships that compromise, or could reasonably be perceived to compromise, professional boundaries, objectivity, independence of judgment or proper governance arrangements.

Professionalism

A set of behaviours which reflects the standards, skills, competencies and ethics associated with a role.

Protected characteristics

Distinguishing features or traits of groups and individuals which are protected under the law from discrimination and unfair treatment. The protected characteristics under the Equality Act 2010 are age, gender reassignment, being married or in a civil partnership, being pregnant or on maternity leave, disability, race including colour, nationality, ethnic or national origin, religion or belief, sex and sexual orientation.

Residents

Throughout the code, we use the term 'residents' to include residents, tenants, leaseholders, shared owners and users of other services provided by emh Group.

Strategic objectives

Specific goals an organisation sets itself in order to achieve its strategy. These are the things the organisation plans to do to get from where it is now to where it would like to be in the future.