DRAFT CODE OF CONDUCT FOR STAFF - October 2026

PURPOSE

This Code explains how everyone working for Hexagon is expected to behave while doing their job. It applies to all employees, including temporary and agency workers. It helps ensure that we act with integrity, treat people fairly, make sound decisions and remain accountable for our actions. Most importantly, it reinforces our shared responsibility to put customers at the heart of everything we do.

We expect everyone to provide a good service to residents and to the other people and organisations we work with.

Hexagon will explain this Code and the Probity Policy to new employees and agency workers during induction.

In this Code: "must" means you are required to do something; "must not" means it is prohibited; and "should" describes the standard normally expected. If you are unsure what a rule means for you, ask your manager before acting.

Part 1: Acting in the best interests of residents and Hexagon

1. GENERAL CONDUCT

Follow the policies and procedures that apply to your work. Do your job in a way that supports Hexagon's purpose, values, strategic objectives and the long-term interests of current and future residents.

Act professionally. Be courteous, efficient, reliable, and punctual. Do your job to the best of your ability. If anything prevents you from meeting your responsibilities, tell your manager.

Embed Hexagon's CARE values and behaviours in your work:

- Customers at the Heart
- Appreciating Difference
- Responsible and Accountable
- Empowering Others

2. REPRESENTING HEXAGON

In representing Hexagon in any capacity, including at external events, in dealings with outside bodies and on social media, you are ambassadors for Hexagon and must uphold and promote our values, objectives and policies.

Do not behave dishonestly, misleadingly or inappropriately in a way that could damage Hexagon's reputation. Do not knowingly make false, malicious or misleading statements about Hexagon or anyone connected with it.

Do not present yourself as speaking officially for Hexagon unless you are authorised to do so.

Part 2 – Behaving with Integrity

By integrity, we mean that you must act honestly, transparently and in line with the highest standards of ethical conduct.

4. FINANCIAL CONDUCT

Use Hexagon's money and resources responsibly, transparently and only for their intended purpose. Use them lawfully, protect them from misuse, theft and waste, and seek value for money for Hexagon and its residents. Follow the financial rules, standing orders and internal controls that apply to your role.

It is a serious criminal and disciplinary offence to give or receive a gift, loan, fee, reward or other benefit in return for doing something, not doing something, or treating a person or organisation more or less favourably. Hexagon has zero tolerance for bribery.

If there is reasonable evidence that you received a reward or gift, you may need to show that it was not obtained corruptly.

5. PROBITY

Hexagon's **Probity Policy** applies to you, your close relatives and any profit-making business you are connected with. Because Hexagon is a charity, you must also follow the relevant principles of charity law.

Do not receive any payment, grant or loan from funds connected with Hexagon unless it is due under your employment contract, including repayment of legitimate expenses. If you give or receive a payment or benefit from Hexagon's funds in breach of the **Probity Policy**, Hexagon will normally recover the money.

6. TENDERING AND PURCHASING

Purchasing decisions must be fair, objective and recorded. Follow the **Probity Policy** and **Procurement Procedures**. Ask the Directors Group for advice if a proposed contract may involve a business connected with an employee or their relative.

6.1 General

Treat all consultants, suppliers, contractors and subcontractors fairly and impartially. Award orders and contracts on merit through fair competition and open, recorded negotiation. Do not favour a business connected with you, your family, close friends, current employees, recent former employees, or their partners, close relatives or associates.

6.2 Confidential information

Do not give confidential tender prices or other commercially sensitive information to anyone who is not authorised to receive it.

7. USING HEXAGON'S SUPPLIERS OR CONTRACTORS PRIVATELY

Where reasonable alternatives exist, avoid using Hexagon suppliers, contractors, consultants or other organisations for personal purposes.

If you do use one, keep your personal arrangements completely separate from Hexagon's business. Do not ask for or accept favourable treatment. Before buying the goods or services, declare the arrangement to your manager and get their written consent.

8. EMPLOYMENT MATTERS

Make appointments on merit and the candidate's ability to do the job. Do not let personal preferences influence decisions.

Do not take part in appointing someone who is your relative or with whom you have, or previously had, a close personal relationship outside work. Declare the relationship to your manager even if you are not involved in the appointment.

Do not take part in decisions about discipline, promotion or pay for a relative, partner or anyone where the relationship could create a conflict of interest. Follow all legal and Hexagon procedures fairly and impartially.

Do not seek colleagues' or Board members' support for a candidate. Resist and report any attempt by others to do so. If you or a family member is a Hexagon resident, do not use your job to gain an advantage or preferential treatment.

9. OUTSIDE ACTIVITIES

Your life outside work is private, but you must declare anything that may overlap or conflict with Hexagon's interests. If unsure, tell your manager and get any required written permission.

9.1 Social media

If a personal account mentions your Hexagon role, make clear that you are speaking for yourself. Do not post content that damages Hexagon's reputation or makes derogatory comments about Hexagon, colleagues, residents, customers, their relations, partners or services. This applies even if you use a pseudonym or can be identified only indirectly. Report genuine concerns to your line manager or Director.

9.2 Paid employment and voluntary work

Get written permission before starting any paid, unpaid or voluntary activity if it overlaps with your Hexagon duties, arises because of your work, or uses information or material available through your job.

Do not take work that conflicts with Hexagon's interests, purpose or your ability to perform your role. Payment for work-related writing or speaking done in work time must be paid to Hexagon. Outside activity must not materially or persistently harm Hexagon's reputation or your performance.

9.3 Use of facilities

Do not carry out paid outside work at Hexagon premises or use Hexagon facilities, administration, post or telephone services for it. The same rule applies to unpaid or voluntary activity unless your manager gives written permission.

9.4 Political, campaigning and public activity

Do not let personal or political views affect your work or impartiality. Get your manager's prior consent for public, political or campaigning activity that could reasonably affect Hexagon. Consent may be refused only where the activity poses a material risk to Hexagon.

10. GIFTS, HOSPITALITY AND INTERESTS

Do not put yourself under an obligation that could influence, or appear to influence, your work. Declare and record any gift or hospitality you are allowed to accept.

10.1 Gifts

Never ask for a personal gift or accept cash or a personal gift of significant value. You may accept low-value promotional items such as pens or calendars. If a gift cannot be returned, give it to Human Resources for the annual raffle. When refusing a gift, be polite but firm and refer to this Code.

10.2 Hospitality

Never ask for or offer lavish hospitality or accept hospitality that could improperly influence your work. Be especially careful around purchasing or procurement decisions. As a general rule, accept only hospitality that Hexagon would offer in similar circumstances. If you refuse hospitality, be polite but firm. If necessary, pay your share and claim a reasonable cost from Hexagon in the normal way.

10.3 Acceptable hospitality

You may accept or offer modest working meals and light refreshments without declaring them. Get written permission before accepting other hospitality. It may be appropriate where you need to share information or represent Hexagon in the community, attend an important community event, or attend a relevant conference or course where the hospitality is corporate rather than personal. Record all other hospitality received, and hospitality given for Hexagon, in the hospitality register.

10.4 Site visits

If a contractor or supplier takes you to inspect a site or equipment, offer to repay their costs and claim the cost from Hexagon in the usual way.

10.5 Sponsorship

When an outside organisation offers or seeks to sponsor Hexagon activity, apply the same rules used for contracts, gifts and hospitality.

10.6 Conflicts and declarations

Do not let personal interests influence your decisions or use your position for gain for yourself, family, friends or associates. Take reasonable steps to prevent any actual or perceived conflict between your Hexagon duties and your interests, duties or relationships.

Declare actual or potential conflicts promptly to your manager and in Hexagon's register of interests. This includes connections with residents, applicants, customers, employees, Board members, contractors or suppliers, and financial or non-financial interests involving you, close family, friends or associates. Examples include property transactions or awarding a contract to a connected person or business. Ask your manager before acting if unsure.

Complete an initial declaration and update it whenever a new interest arises. Registers are normally open to public inspection unless there is a valid reason for confidentiality. Required declarations will also be recorded in the appropriate register or HR record. Declare conflicts arising from roles with another social landlord, voluntary agency or local authority.

10.8 Meetings

At a Board or committee meeting, declare any interest in an item being discussed. If the conflict is substantial, do not join the discussion or decision and offer to leave; you may also be asked to leave.

10.9 Organisations with secret membership or rules

Tell your manager if you belong to an organisation that is not open to the public and requires allegiance and secrecy about its rules, membership or conduct. This does not include a generally recognised religion or a trade union branch.

11. REPORTING CONCERNS

You must report to the appropriate person within Hexagon any reasonable suspicions you have about possible wrongdoing in line with this code or relevant Hexagon policies and procedures. This includes suspected dishonesty or fraud, a serious breach of this Code, being asked to act in a way that conflicts with this Code, or a breach of the law, including health and safety law

At Hexagon, we promote a culture where people feel able to speak up and raise concerns without fear of unfair treatment. Our **Confidential Reporting** (Whistleblowing) Policy provides confidential reporting routes for colleagues, Board members and others.

Do not victimise, disadvantage or treat anyone unfairly because they raised a concern, made a complaint or used a reporting or whistleblowing procedure in good faith.

Part 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 staff of Hexagon. Respectful, fair and empathetic behaviour is essential to building trust, maintaining effective relationships and supporting a healthy organisational culture.

12. PROFESSIONAL RELATIONSHIPS

You must maintain constructive, professional relationships with colleagues, Board members, involved residents, residents, contractors and other external contacts. Understand each person's role, act with independence and integrity, and keep appropriate professional boundaries.

Do not ask or encourage anyone to break the law or this Code. Challenge language or behaviour that reinforces stigma about social housing residents. Welcome respectful challenge and disagreement, and challenge others constructively.

12.1 Board members and involved residents

Staff are accountable to the Board through the management structure led by the Chief Executive. Treat Board members and involved residents with respect. Avoid inappropriate familiarity and do not use informal channels to lobby or influence them about Hexagon business.

Never knowingly mislead the Board, a committee or a panel. Present facts, relevant issues and risks truthfully.

12.2 Residents

Treat residents fairly and properly. Listen to their views, be accountable for your actions, provide a courteous, efficient and impartial service, and consider residents' safety and wellbeing. Give your name and job title when dealing with a resident or member of the public. Seek and value residents' views when decisions will affect them.

Do not let a personal relationship with a resident affect your judgement or use it for personal advantage. Declare the relationship to your line manager and Human Resources using the Conflict-of-Interest declaration form. Avoid professional contact with friends, relatives or acquaintances who are residents; managers must allocate work to prevent it. An exemption may be considered only after the relationship has been declared and professional contact has been avoided.

Do not encourage a resident to make a will or trust naming you as executor, trustee or beneficiary. Handle a resident's money or valuables only when absolutely necessary, record every transaction and follow Hexagon's financial controls. Never borrow money from, accept money or a bequest from, or lend your own money to a resident.

12.3 Potential residents

If you help award tenancies or allocate housing, act impartially and avoid conflicts of interest. Declare any relevant information gained outside normal channels before the decision is made. Tell Hexagon if you or a relative applies for Hexagon housing, because the **Probity Policy** may prevent an allocation.

12.4 Contractors

Declare any current or past business or personal relationship with an existing or potential contractor to the Head of HR & Facilities, whether or not you appoint or supervise contractors. The **Probity Policy** may prevent a contract being awarded. Also follow section 15.

13. EQUALITY

Equality of opportunity is a core Hexagon value. Everyone must help put Hexagon's equality policies into practice and monitor how well they work.

Follow equality law and Hexagon's **equality and diversity policies** in both their wording and their purpose. Treat residents, local communities, suppliers and colleagues fairly.

Do not discriminate, harass, bully or intimidate anyone. Do not use threatening, aggressive or discriminatory behaviour, including subtle or repeated behaviour that could reasonably make someone feel marginalised, threatened, patronised or dismissed. Do not display material or use language that colleagues, residents, customers or contractors could reasonably find offensive.

Report unfair or unequal treatment to your manager or the next manager in line. If investigating such a report is part of your role, investigate thoroughly, sensitively and confidentially.

14. RESPECT AND EMPATHY FOR OTHERS

Treat everyone you deal with through your work fairly, respectfully, politely, considerately and with empathy, whatever their role, status or circumstances. Use any power or authority you have responsibly and, where possible, to empower others.

Respect people's chosen identities, backgrounds, protected characteristics and lived experiences. Do not make assumptions. Help create an inclusive environment where people are treated fairly, listened to and able to raise concerns.

When working in or visiting a resident's home, remember that you are entering their home. Respect their privacy, preferences and property.

15. COMPLAINTS ABOUT STAFF CONDUCT

Deal with residents' complaints promptly and follow the Complaints Procedure.

If a complaint concerns a member of staff, the manager must investigate it and create a clear, accurate record. The record must list follow-up actions and completion dates.

Attach relevant evidence, such as meeting minutes, 1:1 notes, emails and call records, and send the report and attachments to Human Resources for retention. Tell Human Resources when the actions have been completed.

Part 4 – Taking Responsibility for the impact of your actions

16. RESIDENT EXPERIENCE

At Hexagon, we place customers at the heart of decision-making and encourage colleagues to consider the impact their actions and decisions may have on customers and communities.

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

Be ready to explain clearly what you did or decided, especially when residents are directly affected. Respond constructively to feedback about your actions, decisions or performance, whoever provides it.

17. HEALTH, SAFETY AND WELLBEING

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

Do not knowingly put your own or anyone else's health, safety, security or wellbeing at unnecessary risk. Consider these issues whenever you act or make a decision.

Report any concern immediately to your manager, the next manager in line, or through the Confidential Reporting Procedure.

18. OPENNESS, CONFIDENTIALITY AND DATA SECURITY

Hexagon aims to be open and accountable to residents, communities, local authorities and other interested parties. Information about Hexagon's work, Board and employees should normally be available unless there is a valid personal, business or practical reason to keep it confidential. Always respect the confidentiality of residents and other service users and follow Hexagon's data protection and confidentiality policies.

18.1 Openness

Do not block access to information that someone is legally entitled to receive. Support appropriate transparency and understand what Hexagon makes public. Ask your manager if you are unsure or receive an unusual request.

18.2 Confidentiality and data security

We must ensure that our use of digital systems, data and emerging technologies is responsible and protects residents, staff and Hexagon itself from harm.

Keep personal information about residents, housing applicants, colleagues and other people strictly confidential. Do not share it without the required permission and authority. This duty continues after you leave Hexagon.

Follow the **Data Protection and IT Security Policies**. Protect sensitive information from loss, misuse and unauthorised access, and use systems and devices only as Hexagon permits. Report suspected data or cyber security breaches, threats and vulnerabilities immediately through the proper channels.

Do not use commercially sensitive information for personal benefit or give it to someone who might. Do not share unpublished Hexagon information or material with the media or another external recipient without the Chief Executive's authority, unless you are following the **Confidential Reporting Procedure**.

19. ENVIRONMENT AND SUSTAINABILITY

Within your role at Hexagon, you must consider, and try to avoid or reduce, negative impacts on the environment and sustainability. Look for positive environmental outcomes and take reasonable steps to reduce unnecessary waste and use of resources.

Part 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 staff. This includes taking responsibility for your own performance and for meeting relevant professional standards.

20. LEARNING AND DEVELOPMENT

Work with Hexagon to keep your skills and knowledge up to date. Maintain any continuing professional development and records required for your role.

Take an active part in 1:1 supervision and performance appraisals. Tell your manager about training and development needs related to your role and complete all mandatory training.

Unless there is an exceptional reason, attend required learning events and apply what you learn in your work.

21. ACTING WITH CARE AND DILIGENCE

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.

Prepare properly for meetings, decisions and activities where you will contribute, scrutinise or decide.

Do not ignore, hide or play down a problem that needs action. Understand the limits of your responsibility and escalate issues or risks when needed, especially where residents, services, safety or Hexagon's reputation may be affected.

22. CONTINUOUS IMPROVEMENT

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

Give others open, constructive feedback and invite feedback on your own performance.

23. FAILURE TO FOLLOW THE CODE

Not following this Code may harm Hexagon, its work or its reputation. Hexagon may deal with a breach under its disciplinary procedures.