



HONEYCOMB  
GROUP

## **Code of Conduct Policy**



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G R O U P

## Code of Conduct Policy

Who's this for?	Honeycomb Group including subsidiaries
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Reviewed by:	Executive Team 7/1/26 Remuneration & Organisational Development Committee 14/1/26
Approved by:	Board 12/02/26

### Document Revision History

Version	Date	Description of Change	Author
1.0	April 2020	New policy introduced – Code of Conduct Operational	Support and Wellbeing Director
2.0	May 2023	Cyclical Review	Support and Wellbeing Director
3.0	October 2025	Policy revised to align to the NHF Code of Conduct 2022 Scope widened to include Board and Committee Members Policy name changed to 'Code of Conduct Policy'	Governance and Data Protection Business Partner

### Links to Associated Policies and Procedures

- Corporate Plan 2024-2029
- People Strategy
- EDI Strategy
- Anti-Fraud and Bribery Policy
- Gifts and Hospitality Policy
- Data Protection Policy
- Financial Regulations
- Procurement Policy
- Confidential Reporting and Whistleblowing Policy
- Board Conflicts of Interest Policy
- Serious Incident Procedure & Guidance
- Disciplinary Policy
- Grievance Policy
- Professional Boundaries Policy
- Board and Committee Member Conduct Review Procedure
- Health and Safety Policy
- ICT Data Security Policy
- ICT Acceptable Use Policies
- Social Media Policy
- Board Member Expenses Policy

## **1. Introduction and purpose**

This policy sets out the standards of behaviour and conduct expected of board members and employees of the “Group” (Honeycomb Group Ltd and its subsidiaries).

It reflects the expectations set out in the National Housing Federation’s (NHF) Code of Conduct 2022.

The Board agreed to adopt the NHF Code of Conduct 2022 and approve this policy on 12<sup>th</sup> February 2026 by resolution.

## **2. Policy aims and objectives**

This policy sets out the standards of behaviour and conduct expected of board members and employees across the Group.

The Group Board has responsibility for the actions, policies and work of the Group and this policy aims to promote a culture which supports all individuals to meet their responsibilities and deliver the best possible service for residents and customers. It is vital for the Group’s reputation, the reputation of the social housing and charity sector, that those who are responsible for leading and working for the organisation adhere to the same principles.

The policy objectives are aligned to the NHF Code of Conduct 2022, and these are split into four parts:

- Part 1: Acting in the best interests of the Group and its customers/residents
- Part 2: Behaving with integrity
- Part 3: Conducting yourself professionally and treating others well
- Part 4: Protecting yourself, other people and the environment

Where issues of performance, conduct or conflicts arise that cannot be resolved, other policies are in place and designed to respond to incidents of alleged misconduct in contravention of:

- this policy
- the terms and conditions of Board or Committee members’ Deed of Appointment
- the terms and conditions of all employees

If there is a conflict between an employee’s contractor employment or a board members’ deed of appointment and this policy, the contract takes precedence.

## **3. Policy Scope and Definitions**

This policy applies to board and committee members and employees.

For volunteers and involved residents, separate guidance has been produced, specific to their roles.

**‘Board’** – means any board, sub-committee of a board, board of trustees and all similar governing bodies however named.

**‘Board members’** – means all members of governing bodies whether they are known as non-executive directors, trustees, board members and includes members of sub-committees including those who are customers and independent members (if they are in use). It also includes executive board members and co-optees (if they are in use). Board members of any HG subsidiary, including independent members (if they are in use).

**‘Chair of the Board’** – means the Chair of the Board to which the Board Member is on, i.e. Honeycomb Group Board or Honeycomb Charitable Services Board.

**‘Employees’** – means employees, also known as staff and includes 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.

**‘Everyone’** – means all individuals to which this policy applies.

**‘Group’** – means Honeycomb Group Ltd and subsidiaries.

**‘Known relationship’** – means related parties and close connections, it is not envisaged that relationships with acquaintances should be covered by this term.

**‘Microaggression’** – a term used for brief and commonplace verbal, behavioural or environmental slights that may communicate hostile, derogatory, or negative attitudes towards certain groups of people.

**‘People with whom they are closely connected’** – means family, relatives or business partners as well as businesses in which they have an interest through ownership or influence. The term includes spouse, or unmarried partner or civil partner, children, siblings, grandchildren and grandparents.

**‘Raised through the appropriate channels’** – means raising with the person they report directly to. If unsure due the circumstances of the situation and/or if there is a conflict, for employees contact a member of the People Team. For Board Members contact the Governance and Data Protection Business Partner or the Company Secretary (Executive Director Finance).

**‘Related parties’** – means people or organisations they have a close connection with, such as family members, friends or businesses they are involved with. These are relationships that could influence decisions or create a conflict of interest.

**‘Residents and other customers’** – means residents, tenants, leaseholders, shared owners and users of services provided by the Group.

**‘Social purpose’** – means the Group’s commitment to creating a positive impact on society, the environment and the communities it serves. It goes beyond financial objectives and focuses on contributing to the greater good through responsible, ethical and sustainable practices.

**‘Wrongdoing’** – means any action or behaviour that violates the standards, rules or ethical principles set out in this policy. This can be:

- doing something that is not allowed or considered inappropriate under the Group’s policies;
- acting dishonestly, unfairly or in a way that harms others or the organisation;
- misuse of position or resources for personal gain; or
- causing harm based on actions that could damage the company’s reputation, finances or the wellbeing of colleagues.

#### **4. Links to Legislation and Policies**

The guidance contained in this policy is not designed to anticipate every situation in which board members and employees could find themselves in. Everyone is expected to apply good judgement where this policy does not contain specific requirements. Board members and employees should remain mindful that it is always important to consider how any action taken, or decision made, aligns with the Group’s purpose and values and they should consider the impact or potential impact it may have on customers, the Group’s reputation and that of the wider social housing and charity sector.

The application of this policy is supported by other Group policies. These are listed on page 2 and also highlighted throughout.

## 5. Part 1: Acting in the best interests of the Group and its customers

### 5.1 Meeting responsibilities

Everyone has the responsibility to discharge their role and duties in line with the purposes and values of the Group. In meeting responsibilities, all must fulfil their duties and obligations responsibly, acting at all times in good faith and in the best interests of the Group and for the delivery of its strategic objectives.

**5.1.1 Fulling roles and duties** – everyone must always try to fulfil the requirements of their role to the best of their ability. If any circumstances arise that limit the ability to meet responsibilities, this must be raised through the appropriate channels.

**5.1.2 Culture and Values** – everyone must always seek to further the Group's strategic objectives, in order to reflect the Group's desired culture and organisational values. The Group's Corporate Plan, *Thriving Futures*, sets out the current strategic objectives. The Group's organisational values and behaviours are outlined in the *People Strategy*.

**5.1.3 EDI** – everyone must support the Group's Equality, Diversity and Inclusion objectives by not acting in any way which discriminates against, or unjustifiably favours particular individuals, groups or interests, including on the basis of any protected characteristics that they may have. These are outlined in the *EDI Strategy and Policy*.

**5.1.4 Safety and Wellbeing** – always consider the impact of actions on the safety and wellbeing of the Group's customers and the communities that it serves.

**5.1.5 Conflicts with role** – employees must consult their manager before taking any other paid or voluntary work that may interfere with their existing job, or conflict with terms set out in their contract of employment.

Board members must ensure that any relevant personal relationships, employment and other appointments are declared and that these do not interfere with the ability to perform or conflict with their role. These are outlined in the *Board Conflicts of Interest Policy*.

**5.1.6 Collective decisions making for Board Members** – board members must respect the principles of collective decision-making and corporate responsibility.

- 'Collective decision-making' is the process by which Board members work together to achieve a decision (or general consensus) and take responsibility as a group for the making of that decision and its consequences or impacts.
- 'Corporate responsibility' is the impact that an organisation makes on society, the environment and the economy.

### 5.2 Representing the Group

When representing the Group in any capacity, including at external events, in dealings with outside bodies or on social media, as an ambassador, everyone must uphold and promote its values, objectives and policies.

#### 5.2.1 Representation

When representing the Group everyone must:

- act in accordance with the Group's values, policies and goals;

- not conduct themselves in a manner that could reasonably be regarded as bringing the organisation into disrepute;
- not make derogatory, false, or otherwise damaging comments, in person or through any medium, about the Group or any person, service or organisation connected to it;
- not seek to officially represent the views or position of the Group without prior authority;
- adhere to the Group's policies in the use of email, internet services, including social media;
- act at all times with professionalism when representing the Group through any medium, including social media;
- be clear in what capacity they are communicating and where any personal social media accounts refer to their role. For example, everyone must make it clear that any views expressed on personal social media accounts are personal views and do not officially represent the views or position of the Group; and
- obtain prior consent if intending to engage in any activity (including political or campaigning) which could have the potential to, or may reasonably be regarded to, affect the Group or its interests. Such consent must not be unreasonably withheld unless the activity poses a material risk of harm or detriment to Group.

**5.2.2 Conflicts of Interest for Board Members** – not take part in discussions or decisions where there is a conflict of interest and be prepared to resign if the conflict is material or long-standing, and in the opinion of the Board cannot be managed appropriately.

## 6. Part 2: Behaving with integrity

The Group's reputation depends on compliance with the content of this policy and the laws, policies and procedures it refers to. The integrity of those engaged by the Group needs to be beyond doubt and seen so to be.

### 6.1 Conflicts of Interests

Everyone must take all reasonable steps to make sure that no conflict arises or could reasonably be perceived to arise, between roles/duties and personal interests, other duties and relationships.

#### 6.1.1 Declarations

Everyone must:

- formally declare at the earliest opportunity any interests which may (either now or in the future) or could be perceived to, conflict with the duties of their role;
- declare any known relationship to a person applying for, or performing a role within the Group and must not be involved in their appointment, performance management or reward;
- declare any known relationship to a resident, potential resident or other customer or potential customers and not seek or accept any preferential treatment for them, nor be involved in any decisions relating to their relationship with the Group;
- declare any known relationship to a person or organisation seeking appointment as a contractor or supplier to the association and must not be involved in their appointment, performance management or reward;

- avoid using the Group's contractors and suppliers for private purposes where the Group's use of the contractor is expressly known and to seek express permission to use the contractor or supplier in situations where the use is unavoidable; and
- not use, or attempt to use, their position to promote their personal interests or those of any connected person, business or other organisation for personal gain.

#### **6.1.1 Declarations for Board Members** – see 5.2.2. above.

### **6.2 Bribery, gifts and hospitality**

Everyone must not offer, seek or accept bribes or inducements to act improperly or corruptly in the performance of their role/duties. They should not seek or accept gifts, hospitality or other benefits from individuals or organisations that might reasonably be seen to compromise their judgement or integrity or place them under an obligation to the individuals or organisations who are offering them. In particular, they must not seek or accept preferential treatment in the provision of benefits such as housing, accommodation or employment.

The organisation's approach to anti-fraud, bribery, gifts and hospitality are set out in the *Anti-Fraud and Bribery Policy* and the *Gifts and Hospitality Policy*.

Everyone must:

- not solicit or seek gifts or hospitality or other benefits;
- declare or decline any gift or hospitality offered in line with the *Gifts and Hospitality Policy*; and
- decline and declare immediately if offered a bribe, hospitality or a gift which is or may be in return for expected preferential treatment.

#### **6.2.1 Reporting declarations** – these should be made as soon as possible.

- **Staff members** – by completing the *gifts and hospitality form* on the Hive.
- **Board members** – via an Executive Assistant, Governance and Data Protection Business Partner or Company Secretary (Executive Director Finance).

### **6.3 Funds, resources and personal benefit**

Everyone must not misuse the Group's funds or resources or seek preferential treatment for their own personal benefit. Further guidance is included in the Group's *Financial Regulations, Procurement Policy, Anti-Fraud and Bribery Policy, ICT Acceptable Use and Board Members Expenses Policy*.

Everyone must ensure:

- that the Group's funds and resources are used properly and efficiently;
- that any procurement decisions are guided by the Group's *Financial Regulations and Procurement Policy*, fairness in decision-making and in line with relevant law;
- they take all reasonable measures to protect the Group's funds, resources, property and assets from fraud, theft, damage and misuse; and
- they claim reimbursement for any expenses in line with the Group's policies on claiming expenses including retaining and providing receipts for all properly incurred role-related expenditure.

## 6.4 Confidentiality

Everyone must process information in accordance with the law, the Group's policies and procedures. In particular, everyone must:

- not disclose, without the required permission and authority any personal data about customers, employees or board members;
- not disclose without authority any confidential or sensitive business information or materials without authority unless they are doing so in accordance with the Group's *Confidential Reporting and Whistleblowing Policy*. This duty continues to apply after leaving the organisation or if having stepped down or retired from their position;
- not pass or distribute to the press or media or to any other external recipient(s) any unpublished information or materials relating to the Group without authority unless doing so in accordance with the *Confidential Reporting and Whistleblowing Policy*; and
- not prevent another person from gaining access to information to which they are entitled by law.

**6.4.1 Company business, Board and Committee Meetings** - you must always treat the following matters of company business including papers and minutes of all board and committee meetings and any papers and documents shared with board and committee members outside of the board and committee meeting process for review or decision-making purposes. This may include:

- matters relating to treasury, financial, banking or funding;
- matters relating to partnerships, merger or joint-venture activities;
- copies of legal advice or opinion shared with the board for contextual or decision-making purposes; and
- information which is shared with the board and expressly stated as being embargoed until a specific date or time.

## 6.5 Reporting concerns

Concerns must be reported to the appropriate person any reasonable suspicions about possible wrongdoing. The Group's approach to reporting concerns is outlined in the *Confidential Reporting and Whistleblowing Policy*. The policy sets out when concerns should be reported, who they should be reported to and how the organisation will respond to concerns that are raised.

- If there is a concern about possible wrongdoing, it must be reported immediately. This includes becoming aware of potentially dishonest or fraudulent activity, and material breaches of this policy or relevant legislation including health and safety.
- If being required to act in a way which conflicts with this policy or legislation it must be reported immediately in line with the Group's *Confidential Reporting and Whistleblowing Policy*.
- You must not victimise or disadvantage any person who uses or intends to use the *Confidential Reporting and Whistleblowing Policy* to report actual or alleged wrongdoing.

## 7 Part 3: Conducting yourself professionally and treating others well

### 7.1 Respect for others

Professionalism, consideration and respect of others and a commitment to the principles of equality, diversity and inclusion are fundamental to the delivery of social purpose. The organisation's approach to equality, diversity and inclusion is set out in its *EDI Strategy and Policy*.

Everyone must:

- treat everyone they meet in the performance of their role with equal respect, care and consideration;
- show respect to individuals' chosen identities;
- promote through own behaviours an organisational culture that is welcoming, accepting and accommodating to people of all backgrounds, cultures and personal and protected characteristics;
- not harass, bully or attempt to intimidate any person, or use threatening or aggressive behaviour or other discriminatory behaviours. They must seek to avoid microaggressions in speech and behaviour;
- not display materials in the workplace or use language in the performance of their role which other people might reasonably find offensive; and
- report through appropriate channels any instances of unfair or unequal treatment and where it is their role to do so, investigate any such reports thoroughly and with compassion whilst respecting the confidentiality of those involved.

## **7.2 Working with residents and other customers**

When working with residents and customers, everyone must be professional, fair and courteous in all their dealings.

Everyone must:

- seek and value views from residents and customers when making decisions that will affect them;
- not allow any personal relationship with a customer to influence how they discharge their role and responsibilities;
- not give personal gifts or loans of money to or receive personal loans or gifts of money from residents or other customers;
- not handle residents and other customers money unless absolutely necessary, and where necessary ensure that a receipt is completed for every transaction. Everyone must operate in accordance with the Group's *Financial Regulations* to ensure appropriate handling of any and all funds; and
- not invite or influence a resident or other customer (unless they are a person who they are closely connected to), to make a will or trust under which they are named as executor, trustee or beneficiary.

## **7.3 Professional relationships**

Board and staff members must maintain constructive, professional relationships with each other, based on a sound understanding of their respective roles. Further information is included in the *Professional Boundaries Policy*.

They must not ask any person to commit, or encourage the commitment of, wrongdoing, including any breach of this policy.

### **7.3.1 Expectations of Employees**

- Behave in a professional manner, maintaining independence and integrity at all times. This will include avoiding in a professional setting, inappropriate personal familiarity with board members and involved residents.
- Not use informal channels to lobby or influence board members or involved residents on matters of the organisation's business.
- Not knowingly mislead the board or any subsidiary board or any of the board's committees or panels. In presenting information, they must set out the facts and relevant issues and risks truthfully.

### **7.3.2 Expectations of Board Members**

- Relationships with staff and involved tenants must be constructive and professional.
- Set an example by demonstrating the highest standards of integrity and ethics and by demonstrating their alignment with the values, policies and objectives of the organisation.
- Raise issues of employees, board or contractor performance where they are necessary, constructively and through the appropriate channels, such as the CEO, Chair of the Board or Senior Independent Director.
- Not undermine or appear to undermine the authority of a senior officer in dealings with a more junior member of staff unless there are significant concerns regarding the appropriateness of the behaviour or conduct of the senior officer towards the more junior member of staff.
- Behave in a professional manner maintaining independence and integrity at all times. This will include avoiding inappropriate personal familiarity with employees.
- Not individually give instruction or direction to any member of staff or contractor unless they have specific and where practicable written delegated authority on behalf of the Board to do so.

## **8 Learning and development**

Everyone must take responsibility for their own learning and development, regularly updating and refreshing their skills and knowledge.

Everyone must:

- play an active part in the supervision and performance appraisal processes as they apply;
- offer open and constructive feedback to others and invite feedback about their own performance;
- make personal training and development needs relevant to their role; and
- attend learning and development events as required.

In particular for board members, to keep knowledge up to date in those areas in which they are a specialist and keeping abreast of any matters relating to the Group and the wider housing and charity sector.

## **9 Part 4: Protecting yourself, other people and the environment**

Everyone has a responsibility while on the Group's business to protect their own health, safety and security and wellbeing and that of others, and to minimise harmful environmental impacts.

### **9.1 Health, safety and security**

Everyone's conduct, actions and decision making must promote health, safety, security and wellbeing of themselves and others. Further guidance is outlined in the *Group's Health and Safety Policy*.

Not knowingly put their own or others' health, safety security or wellbeing unnecessarily at risk.

Any concerns about the health, safety, security or wellbeing of themselves, another individual or a group of individuals connected with the Group must be reported immediately and through the appropriate channels.

### **9.2 Protecting the environment**

Everyone must strive to avoid or reduce possible negative environmental impacts.

In carrying out actions or making decisions in the performance of their role, everyone must consider the environmental impact of those decisions and where they are able seek to achieve positive environmental outcomes.

In particular for board members when making decisions, to consider the long-term environmental impact.

## **10 Responding to breaches of this policy**

If there are concerns that a board or employee has acted improperly or has not met the conduct required of their role as set out in this policy, these concerns should be raised, investigated and responded to through the appropriate channels.

## **11 Data Protection**

For processing, storing and sharing the personal data associated with this policy, we will ensure that it is carried out in accordance with current data protection legislation (UK GDPR, Data Protection Act 2018 and the Data Use and Access Act 2025).

## **12 Review**

This policy shall be reviewed every 3 years unless there is a change in legislation or regulation.