

[The Code of Conduct (the Code) sets out the standards of conduct at Amplius.]

[Code of Conduct Policy]

Document management

Directorate	People and Governance
Policy sponsor	Chief People and Governance Officer
Policy owner	Director of People Services
Policy author	Head of People Partnering and Transformational Change

Review process

Approval route	Director Team – Executive Lead – People and Governance Committee - Board
Approved by	Board
Approval date	15 October 2026
Effective	19 October 2026
Review Frequency	Triennial
Review date	15 October 2029
Version number	2.0

CONTENTS

CODE OF CONDUCT POLICY	1
Document management	1
Review process	1
Policy introduction	3
Scope	3
Policy details	5
Policy Guidelines	5
Part 1: Acting in the Best Interests of Amplius and its Customers	5
Part 2: Behaving With Integrity	6
Part 3: Treating Others Fairly, With Respect and Empathy	9
Part 4: Taking Responsibility for the Impact of Your Actions	10
Part 5: Acting With Diligence and Care	11
Compliance with the Code	12
Equality, Diversity and Inclusion	13
Compliance and administration	14
Legal and Regulatory Compliance	14
Evaluation, Review and Performance Monitoring	14
Related Policies	15
Appendices	16
A. Associated Documents – Internal procedural document, colleague use only	16
B. Definitions	16
Changelog	17

Part 2

Policy introduction

Scope

The Code of Conduct (the Code) sets out the standards of conduct and behaviour expected at Amplius.

This policy supports Amplius' values, social purpose and commitment to delivering high-quality services to our customers and communities. It establishes clear expectations so that everyone working for, representing or acting on behalf of Amplius understands the standards expected of them and behaves with integrity, professionalism, respect and accountability.

The Code reflects the National Housing Federation Code of Conduct and supports Amplius' compliance with the regulatory framework for social housing, including the Regulator of Social Housing's Competence and Conduct Standard.

The Code is underpinned by five principles:

- Acting in the best interests of customers and Amplius
- Behaving with integrity
- Treating others fairly, with respect and empathy
- Taking responsibility for the impact of our actions
- Acting with diligence and care

The Code cannot cover every situation that may arise. Everyone covered by the Code is expected to exercise good judgement and consider how their actions and decisions align with Amplius' purpose, values and policies, the impact they may have on customers and others, and whether they uphold the professional standards expected by Amplius.

Where anyone is unsure about the appropriate course of action, they should seek advice from their manager or another appropriate person before acting.

The policy does not form part of any colleague's contract of employment and may be amended by Amplius from time to time.

The term Amplius incorporates all member companies and subsidiaries, which includes The Teetotal Homes.

This policy applies, as appropriate to their role, to all colleagues, consultants, contractors, casual workers, volunteers, interns, Board and Committee Members and customers undertaking a formal role within Amplius' governance, scrutiny or decision-making arrangements.

Where services connected with the management of social housing are delivered on behalf of Amplius by contractors or other service providers, Amplius will take appropriate steps to ensure that relevant individuals delivering those services have the necessary skills, knowledge and experience and demonstrate appropriate standards of behaviour.

Different arrangements may apply depending on the nature of an individual's relationship with Amplius. Where appropriate, the principles and standards within this Code will be reflected within contractual, governance or other relevant arrangements.

The Amplius Board is responsible for ensuring that appropriate policies, controls, delegations and arrangements are in place to support compliance with this Code. The Board, together with senior leaders, will promote a culture of openness, respect and accountability to customers and ensure that individuals are enabled and supported to understand and meet the standards expected of them. Day-to-day management responsibility is delegated to the Chief Executive, Chief Officers and Directors.

The Chief People and Governance Officer acts as Policy Sponsor. The Director of People Services is responsible for the ownership, implementation and review of the policy. The Head of People Partnering and Transformational Change is responsible for drafting and updating the policy.

Part 3

Policy details

Policy Guidelines

This Code of Conduct sets out the standards of behaviour, professionalism and competence expected of everyone acting on behalf of Amplius.

The Code is designed to support a culture of integrity, accountability, respect and continuous improvement, ensuring that our actions reflect our values and commitment to customers.

By adhering to this Code of Conduct, we collectively uphold the values and social purpose of Amplius and contribute to a culture in which customers are treated fairly and respectfully, colleagues take responsibility for their actions and performance, concerns can be raised openly, and everyone understands the standards expected of them.

The principles contained within this Code are intended to:

- Promote trust, transparency and accountability.
- Support positive outcomes for customers and communities.
- Encourage professionalism, integrity and ethical behaviour.
- Ensure customer views, feedback and lived experiences are considered in decision-making.
- Promote a culture of learning, development and continuous improvement.
- Support compliance with legal, regulatory and governance requirements.
- Protect the reputation of Amplius and the wider social housing sector.

The following five parts set out the principles and standards of conduct expected.

Part 1: Acting in the Best Interests of Amplius and its Customers

Everyone has a responsibility to carry out their role in a way that supports the long-term interests of current and future customers and is consistent with Amplius' purpose, values and strategic objectives.

A. Meeting your responsibilities

Duties and responsibilities must be fulfilled responsibly and in good faith, with appropriate consideration given to the interests of customers and Amplius.

Everyone covered by this Code must:

- fulfil the requirements of their role to the best of their ability;
- act honestly, responsibly and in good faith;
- support Amplius' strategic objectives and desired culture;
- not discriminate against, or unfairly favour, individuals, groups or interests;
- consider the impact of their actions and decisions on the safety and wellbeing of customers;
- recognise the limits of their responsibilities and seek advice or escalate matters where appropriate; and
- raise any circumstances which may materially affect their ability to fulfil the requirements of their role through the appropriate channels.

Colleagues must discuss with their manager any other paid employment, business interest or significant voluntary work which could interfere with their ability to fulfil their role, create a conflict of interest or conflict with their contractual obligations.

Board and Committee Members must respect collective decision-making and take responsibility for properly made decisions of the Board or Committee, even where they may personally have taken a different view.

B. Representing Amplius

In representing Amplius in any capacity, including at external events, in dealings with outside organisations and through social media, individuals are ambassadors for Amplius and must uphold its values, objectives and policies.

Everyone covered by this Code must:

- act in accordance with Amplius' values, policies and objectives;
- behave professionally;
- not conduct themselves in a manner which could reasonably be regarded as bringing Amplius into disrepute through dishonest, misleading or inappropriate behaviour;
- not knowingly make false, malicious or misleading statements about Amplius or those connected with it;
- not claim to represent the official views or position of Amplius unless authorised to do so;
- comply with relevant Amplius policies when using email, digital systems, the internet and social media; and
- maintain appropriate professional standards when representing Amplius through any medium.

Where a personal social media account refers to an individual's role with Amplius, they should make clear the capacity in which they are communicating and distinguish personal views from those of Amplius.

Where an individual intends to undertake political, campaigning or other external activity which could reasonably be perceived to affect Amplius or create a conflict with their role, this must be discussed with the appropriate person in advance. Any restrictions imposed by Amplius will be reasonable, proportionate and consistent with statutory rights.

Nothing within this Code is intended to prevent anyone from exercising a statutory right, including raising a grievance or complaint, making a protected disclosure, participating in lawful trade union activity or undertaking other lawful activity.

Part 2: Behaving With Integrity

Everyone must act honestly, transparently and in accordance with high standards of ethical conduct.

C. Conflicts of Interest

Personal interests, relationships or other responsibilities must not improperly influence, or reasonably appear to influence, an individual's work for Amplius.

Everyone covered by the Code must:

- declare at the earliest opportunity any actual, potential or perceived conflict of interest;
- declare any known relationship with a colleague, Board or Committee Member, candidate, customer, contractor or supplier where the relationship could influence, or reasonably be perceived to influence, their professional judgement;
- not participate in decisions where an unmanaged conflict could influence, or reasonably appear to influence, the outcome;
- not use their position, information obtained through their role or influence within Amplius to secure an improper personal benefit or advantage for themselves or another person;
- not improperly influence decisions through pressure, inducements, personal relationships or other inappropriate means;
- not use Amplius' contractors or suppliers for private purposes except where specifically permitted; and
- comply with Amplius' requirements for declaring and managing conflicts of interest.

Board and Committee Members and customers undertaking formal governance, scrutiny or decision-making roles must be clear about the capacity in which they are acting and must not use their position to improperly influence individual operational or service decisions.

Board and Committee Members with a material conflict must not take part in relevant discussions or decisions and must comply with applicable governance arrangements for managing conflicts.

D. Bribery, Gifts, and Hospitality

Amplius does not tolerate bribery or corruption.

No individual must offer, request, give or accept a bribe or other inducement intended to secure improper or preferential treatment.

Gifts, hospitality or other benefits must not be sought or accepted where they could reasonably be considered to influence judgement, place an individual under an obligation or create an expectation of preferential treatment.

Any bribe, gift or hospitality offered in return for actual or expected preferential treatment must be declined and immediately declared through the appropriate process.

Colleagues must not accept gifts in cash or cash equivalents, including cheques or gift cards. Where items are bequeathed in a will or through similar means, advice must be sought from the Company Secretary.

Amplius considers the acceptance of gifts or hospitality valued at £100 or below to be acceptable where this is permitted under the relevant policy and properly declared.

All gifts and hospitality must be declared and recorded in accordance with the Declaration of Interest/Gifts and Hospitality Policy and associated procedures.

E. Funds, Resources, and Personal Benefit

Amplius' money, property, systems, equipment, information and other resources must be used responsibly and must not be misused for personal benefit.

Individuals must:

- use Amplius' funds and resources properly and efficiently;
- comply with procurement, financial and other relevant controls;
- take reasonable steps to protect Amplius' assets from fraud, theft, loss, damage or misuse;

- make expenses and other financial claims honestly and in accordance with relevant policies; and
- not use Amplius' resources, information or their position for improper personal benefit.

F. Confidentiality

Information obtained through an individual's role must be handled responsibly, lawfully and securely.

Individuals must:

- protect personal, confidential and commercially sensitive information;
- only access information where there is a legitimate reason connected with their role;
- not disclose information without appropriate authority or another lawful basis;
- comply with data protection, information governance and cyber security requirements;
- not improperly prevent another person from accessing information to which they are legally entitled; and
- support openness and transparency where appropriate and consistent with legal and confidentiality requirements.

These responsibilities may continue after employment, appointment or another relationship with Amplius has ended.

G. Working with Customers

Professionalism, fairness, empathy and courtesy must be maintained in all dealings with customers.

Individuals must:

- listen to and value customer views and feedback;
- seek and consider customer views where making decisions that affect them;
- communicate clearly and appropriately;
- recognise individual circumstances, needs and vulnerabilities;
- maintain appropriate professional boundaries;
- not give personal loans of money to customers or accept personal loans from customers;
- not improperly encourage or influence a customer to make a will, trust, gift or other financial arrangement from which they, or a person connected with them, could benefit.
- ensure personal relationships with customers do not influence professional judgement; and
- behave respectfully and with care when entering or working within a customer's home, respecting their privacy, preferences and personal property.

Where handling customers' money forms a legitimate part of an individual's role, Amplius' financial procedures and controls must be followed.

Customers undertaking formal governance, scrutiny or decision-making roles must represent concerns and experiences honestly and must not use their position to seek unfair advantage or preferential treatment.

H. Reporting Concerns

Everyone is responsible for speaking up where they reasonably believe wrongdoing, unsafe practice or a material breach of this Code may have occurred.

Concerns must be raised through the most appropriate route, which may include a manager, People Services, the Whistleblowing Policy, safeguarding arrangements, health and safety arrangements or another appropriate internal or external channel.

Individuals must raise concerns where they believe they are being asked to act unlawfully or in a way which materially conflicts with this Code.

No person must victimise, disadvantage or treat unfairly anyone who raises a concern, makes a complaint or uses whistleblowing or other reporting procedures in good faith.

Part 3: Treating Others Fairly, With Respect and Empathy

The way people behave towards each other is fundamental to the experience of customers and colleagues. Respectful, fair and empathetic behaviour supports trust, effective relationships and a healthy organisational culture.

I. Fairness, Respect and Empathy

Everyone must be treated fairly, respectfully and with empathy, regardless of their role, status, circumstances or background.

Individuals must:

- treat customers, colleagues and others with dignity, politeness, care and consideration;
- respect people's identities, backgrounds, protected characteristics and lived experiences;
- avoid assumptions and stereotypes;
- recognise where their role gives them power or authority and use this responsibly and, where possible, in a way which empowers others;
- contribute to an inclusive environment in which people feel respected, listened to and able to raise concerns;
- not harass, sexually harass, bully, intimidate, victimise or discriminate against others;
- not engage in behaviour, including subtle or repeated behaviour, which could reasonably make another person feel marginalised, threatened, patronised or dismissed;
- not use or display offensive, discriminatory or inappropriate language or materials in connection with their role; and
- challenge inappropriate behaviour where it is reasonable and safe to do so or report it through an appropriate route.

Concerns about unfair or unequal treatment must be taken seriously and, where it is part of an individual's role to investigate or respond to concerns, this must be done fairly, sensitively and with appropriate regard to confidentiality.

J. Professional Relationships

Board and Committee Members, colleagues, customers undertaking formal roles, contractors and others working with Amplius must maintain constructive and professional relationships based on an appropriate understanding of their respective roles.

Individuals must:

- behave professionally and maintain appropriate boundaries;
- respect the different responsibilities and authority of different roles;
- welcome constructive challenge and respectful disagreement;
- challenge others constructively and respectfully;
- challenge or appropriately report language or behaviour which unfairly stigmatises social housing, customers or communities;
- not encourage another person to breach this Code or otherwise act improperly;
- not knowingly mislead colleagues, senior leaders, the Board, Committees or customers;
- present information honestly, including relevant facts, risks and issues;
- raise concerns about performance or conduct through appropriate channels; and
- not use informal relationships or channels to improperly influence decisions.

Unless appropriate delegated authority has been given, individual Board or Committee Members and customers undertaking formal roles must not give instructions or direction to colleagues or contractors.

Part 4: Taking Responsibility for the Impact of Your Actions

Everyone has a responsibility to consider the immediate and longer-term impact of their conduct, actions and decisions and to be accountable for them.

K. Customer Experience

Individuals whose role affects customers must:

- consider how their conduct, actions and decisions may impact customers;
- be prepared and able to provide customers with a clear and appropriate explanation for actions or decisions taken, particularly where these directly affect them; and
- respond constructively to feedback about their actions, decisions and performance.

Individuals should recognise and acknowledge mistakes and take reasonable action to put things right and prevent recurrence where appropriate.

L. Health, Safety and Wellbeing

Conduct, actions and decision-making must support the health, safety, security and wellbeing of customers, colleagues and others.

Individuals must:

- take reasonable care of their own health and safety and that of others who may be affected by their actions;
- comply with health and safety requirements relevant to their role;
- not knowingly expose themselves or another person to unnecessary risk;
- take safeguarding concerns seriously; and
- promptly report health, safety, security, safeguarding or wellbeing concerns through the appropriate route.

M. Environment and Sustainability

Individuals must consider and, where reasonably possible, avoid or reduce negative environmental and sustainability impacts arising from their role.

Individuals should:

- consider environmental impacts when carrying out activities or making decisions;
- seek positive environmental outcomes where reasonably possible;
- take reasonable steps to reduce unnecessary waste and resource use; and
- support Amplius' environmental and sustainability objectives.

N. Digital and Data

Digital systems, data and emerging technologies must be used responsibly and in ways which protect customers, colleagues and Amplius from harm.

Individuals must:

- take reasonable steps to protect sensitive information from loss, misuse or unauthorised access;
- use digital systems, devices and tools only in ways permitted by Amplius;
- promptly report suspected data breaches, cyber security incidents, digital threats or vulnerabilities;
- ensure their use of digital systems, data and emerging technologies is not misleading, discriminatory, unlawful or inconsistent with Amplius' values and responsibilities; and
- be transparent and proportionate in any permitted use of artificial intelligence and maintain appropriate human judgement and accountability.

Individuals remain accountable for work and decisions for which they are responsible and must not rely on technology as a substitute for appropriate professional judgement.

Part 5: Acting With Diligence and Care

The diligence and care with which individuals perform their roles has a significant impact on the quality of decision-making and services and on the experience of customers and colleagues.

Everyone is responsible for their own performance and for maintaining the standards relevant to their role.

O. Learning and Development

In partnership with Amplius and in accordance with the Amplius Learning and Development Policy, individuals must take responsibility for their learning and development and regularly update and refresh the skills and knowledge required for their role.

Individuals must:

- actively participate in 1:1 meetings and the Amplius Performance Management Framework;
- identify and make known learning and development needs relevant to their role;
- undertake mandatory learning and development;
- attend required learning and development activities unless there are exceptional reasons why they cannot do so;
- apply relevant learning to their role;
- maintain up-to-date knowledge and skills appropriate to their responsibilities; and
- take responsibility for their professional development.

Where a role requires continuing professional development, professional registration or a particular qualification, the individual must maintain the applicable requirements and records and cooperate with Amplius in meeting relevant professional or regulatory requirements.

P. Acting with Care and Diligence

Individuals must act with care and diligence and take responsibility for understanding the requirements and boundaries of their role.

Individuals must:

- understand the responsibilities of their role, including relevant legal, regulatory, professional and policy requirements;
- prepare appropriately for meetings, decisions and activities in which they are required to contribute, scrutinise or make decisions;
- exercise appropriate professional judgement;
- maintain accurate and appropriate records;
- not ignore, conceal or minimise significant problems or risks;
- act promptly where action is required;
- recognise the limits of their knowledge, authority and responsibilities; and
- seek advice or escalate matters where necessary, particularly where customers, services, safety, legal or regulatory compliance or Amplius' reputation may be affected.

Q. Continuous Improvement

Everyone must support a culture of learning and continuous improvement through openness, accountability and learning from feedback and mistakes.

Individuals must:

- be open to learning from customer scrutiny, complaints, feedback, performance information, incidents and other opportunities;
- respond positively and constructively to feedback;
- offer constructive feedback to others;
- invite feedback about their own performance;
- acknowledge mistakes where they occur;
- support appropriate action to put things right; and
- contribute to improvements which reduce the likelihood of problems recurring.

Compliance with the Code

Compliance with this Code is an important responsibility for everyone.

Amplius will take appropriate steps to ensure that the Code is understood and embedded within the organisation. This will include making the Code accessible to colleagues and customers and incorporating relevant expectations into induction, learning and development, performance management and other appropriate arrangements.

Customers will be provided with meaningful opportunities to influence and scrutinise the Code and any significant amendments to it, alongside appropriate engagement with colleagues.

Clear and accessible routes will be available for customers, colleagues, Board and Committee Members and others within scope to raise concerns about behaviour which may be inconsistent with the Code.

Alleged breaches of the Code will be considered fairly and proportionately, taking account of the circumstances, the individual's role, the seriousness and impact of the behaviour and the individual's relationship with Amplus.

For colleagues, concerns may be addressed through informal management action, performance or capability arrangements, or the Disciplinary Policy, depending on the nature and seriousness of the matter. Serious breaches may amount to gross misconduct.

For Board and Committee Members, contractors, consultants, volunteers, customers undertaking formal roles and others covered by the Code, concerns will be considered through the relevant governance, contractual or other applicable arrangements.

Nothing within this section prevents an individual from exercising a statutory right, including raising a grievance or complaint, making a protected disclosure or undertaking lawful trade union activity.

Equality, Diversity and Inclusion

Amplus policies are developed in line with our Equality, Diversity, and Inclusion approach.

Part 4

Compliance and administration

Legal and Regulatory Compliance

This policy fully complies with Amplius' legal and regulatory obligations.

- Equality Act 2010;
- Data Protection Act 2018;
- Health and Safety at Work etc. Act 1974;
- Bribery Act 2010;
- Public Interest Disclosure Act 1998;
- Housing and Regeneration Act 2008, as amended;
- Social Housing (Regulation) Act 2023;
- Regulator of Social Housing Regulatory Standards, including the Competence and Conduct Standard; and
- other applicable employment, equality, health and safety, safeguarding and regulatory requirements.

This list is not exhaustive, and policy authors will undertake thorough research and/or seek professional advice to ensure that Amplius meets its obligations and complies with the current and relevant legislation and regulations.

Evaluation, Review and Performance Monitoring

This policy will be reviewed on a Triennial basis to ensure that it remains fit for purpose. A policy review may also be required earlier, in response to internal or external changes for example changes in legislation. Prompt and effective action will be taken where improvements are identified.

The effectiveness of the Code will be monitored through appropriate information and assurance arrangements, which may include themes and learning arising from:

- customer feedback and complaints;
- customer scrutiny;
- colleague feedback;
- whistleblowing concerns;
- grievances and disciplinary matters;
- performance and capability processes;
- safeguarding and health and safety concerns;
- regulatory findings;
- learning and development information; and
- other relevant assurance activity.

Prompt and appropriate action will be taken where improvements are identified.

Related Policies

- Anti-Fraud, Bribery and Corruption Policy
- Declaration of Interest/Gifts and Hospitality Policy
- Disciplinary Policy
- Equality, Diversity, and Inclusion Policy
- Grievance Policy
- Health and Safety Policy
- Safeguarding Adults and Children Policy
- Whistleblowing Policy
- Data Protection and Information Governance Policies
- Relevant IT, Cyber Security and Acceptable Use Policies
- Performance Management Framework and procedures
- Learning and Development Policy and associated arrangements
- Recruitment and Selection Policy

Part 5

Appendices

A. Associated Documents – Internal procedural document, colleague use only

- NA
-

B. Definitions

Known Relationship

A family, personal, financial, business or other relationship which could reasonably be considered capable of influencing an individual's professional judgement or decision-making.

Close Connection

Includes family members, relatives, partners, close friends, business partners and businesses or organisations in which an individual has a significant interest, ownership or influence.

Involved Customer

A customer who undertakes a formal role within Amplius' governance, scrutiny, engagement or decision-making arrangements.

Personal Familiarity

A relationship or level of familiarity which compromises, or could reasonably be perceived to compromise, appropriate professional boundaries, objectivity or independence of judgement.

Professionalism

Behaving in a way which demonstrates integrity, accountability, competence, appropriate judgement and respect; maintaining appropriate professional boundaries; taking responsibility for performance and development; and complying with the professional, regulatory and ethical standards relevant to the role.

Competence

Having and demonstrating the appropriate skills, knowledge, experience and behaviours required to carry out a role effectively and deliver good-quality services.

Part 6

Changelog

Amended date	Summary of changes	Version №