



OUR CODE OF CONDUCT

A guide to working with us for suppliers, agents, contractors and development partners

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INTRODUCTION

How we present ourselves to residents and businesses is crucial to how people perceive us and our future success.

Every contact with us offers an opportunity to enhance our reputation and demonstrate our commitment to our vision – helping people put down roots.

Who we are

Clarion Housing Group is a business for social purpose. Our experience and financial strength enable us to continue to invest in what we believe in – our residents, our homes and our communities.

We are one of the largest housing providers in England with over 125,000 properties in more than 120 local authorities from Newcastle upon Tyne in the North East to Plymouth in the South West. We provide a range of housing- and community-focused services to the residents living in our homes.

Our approach is to put our customers first and this is evidenced by our customer satisfaction levels of around 80%.

As well as renting, repairing and managing homes, we are also one of the country's top developers of new homes with a commitment to build 50,000 new homes over the next ten years.

Our values

Our values help define us and make us unique. To bring these values to life we all need to believe in them and live them.

- Passion about people – putting our customers' needs at the heart of everything we do and recognising they're the reason we're all here.
- Stronger working together – investing in our communities and delivering one of the country's largest social investment programmes.
- Trust and integrity – a genuine, honest and open approach in all our dealings.
- Ambitious and innovative – to challenge the status quo and continuously improve.
- Valuing the past, creating a better future – having the confidence to use our 100 years of experience to make a difference.

We want you to understand and respect who we are and how our values underpin the way we work and how we treat all our stakeholders both resident and corporate.

This Code of Conduct sets the standard that we expect all our staff and all those we work with to follow.



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Our residents, staff, suppliers, funders and regulators expect us to treat them in a professional manner with dignity and respect, show integrity and avoid any suggestion of influence by biased or improper motives. It is important that we are honest and transparent in all our dealings.

This Code cannot describe every law, policy or process that may apply to you or every situation that you may face whilst working with the Clarion Housing Group.

We expect you to be responsible for understanding and complying with the laws, regulations and policies that apply to your area of operation and for ensuring that your staff are trained, understand their responsibilities and that you have put the necessary policies and procedures in place to ensure compliance.

Wherever this policy refers to staff, it includes directors, non-executives and members (shareholders in an Industrial & Provident Friendly Society).

OUR STANDARDS

The following standards outline how we work and communicate with our stakeholders and contain some detailed information about what we expect in specific areas.

1. Creating a professional work environment

We expect your staff to conduct themselves in a way appropriate for the duty or function you are carrying out or attending.

We believe in an inclusive and non-discriminatory manner at all times. If you observe inappropriate or unacceptable behaviour, you should take action by talking directly to your staff concerned or, if involving Clarion staff, with the Clarion contract manager.

2. Communicating with our residents

We expect you to treat all residents and potential residents in a fair, discreet and courteous manner.

All staff must understand that:

- Any personal relationship must not conflict with the best interest of the resident involved, or bringing undue pressure to bear in matters concerning their rights as residents.
- Any personal relationship with any resident which could be considered to have a conflict of interest must be declared to Clarion's contract manager.
- Residents' personal information is kept confidential.

- No resident is excluded from or receives a better or quicker service as a result of a personal relationship or a gift or bribe.
- No resident feels obliged to make a gift in order to receive the expected level of service.
- Residents are consulted where appropriate.
- No private work for residents should be undertaken unless explicit, written approval has been sought and granted by Clarion Housing Group.

3. Working in a courteous and professional manner

Taking into account the reasonable needs of the resident we expect staff to:

- Implement the notification of works and arrangement of access requirements in your contract.
- Promptly notify the resident and the contract manager of any changes to the access arrangements.
- Forewarn the resident of any disconnection of services, minimise the time disconnected and make appropriate alternative arrangements.
- Ensure your staff take particular care when working in the homes of children, elderly and disabled residents to

ensure that their home is kept safe (e.g. tools lying around, trip hazards).

- Use appropriate measures such as dust sheets to contain dirt, clear up any mess resulting from the works and refrain from using radios or any of the resident's facilities without the resident's permission.
- Keep residents' homes and possessions secure.
- Immediately inform the contract manager or the housing officer of any abusive or violent behaviour by a resident or complaint of abusive or violent behaviour by a resident.
- Restrict activity to normal working hours (except in an emergency) and forewarn residents, neighbours and the contract manager of any unsociable hours of work.
- Arrange wherever possible for access to be arranged when the resident or their representative is present and discourage the holding of keys by members of the contractor's staff.
- Ensure your staff carry identification at all times and make it readily available for residents and Clarion staff.

4. Safeguarding and sharing of personal data

We expect you to safeguard all personal data and only share under approved data protection policies and procedures:

- Keep access to our residents' and staff details confidential and have an approved data sharing agreement in place with us.

5. Open and fair competition

We want to compete in a marketplace that is fair, honest and transparent and we expect you to do the same:

- Keep commercial activities confidential.
- Do not take part in anti-competitive behaviour.
- Do not discuss commercially sensitive data with competitors.
- Do not work in a cartel to manipulate prices.

6. Bribes and inducements

We expect you to stay clear of any form of corruption. Do not offer, promise, give, request or accept bribes or inducements in any circumstances:

- You will not give or receive repeated or lavish entertainment and hospitality to or from our staff (i.e. overseas, overnight or premium). The same applies to your relationship with sub-contractors working on services for us.
- Occasional and modest hospitality and entertainment such as business lunches may be accepted by Clarion's staff with the appropriate manager's approval.
- Inducements offered or given with the intention of influencing a decision or outcome or to reward improper performance are illegal and forbidden. All tenders, quotations and contracts are invalid if bribery is involved and compensation for the costs of transferring the contract and re-tendering will be sought.

7. Supply of services to Clarion staff

We expect our staff to operate with integrity and professionalism. Our staff may not use their position with Clarion to obtain better or cheaper services than they could buy without the Clarion connection:

- If you are a large and regulated or near monopoly supplier such as a telecom company, utility, insurer or bank, you may supply standard services to our staff.
- You must not supply Clarion staff for personal use where use may be open to misinterpretation such as bespoke services or discounted rates.
- You should never feel that you need to supply a member of staff with a discounted or superior service to retain Clarion's goodwill.
- Your sub-contractors must follow the same principles in dealing with any of our staff whose role is to oversee your work on behalf of Clarion.

8. Conflicts of interest

You will make our contract manager aware of any significant personal relationship you are aware of between your staff involved on the contract and a member of our staff, director, member, or resident.

Where the conflict reasonably threatens the objectivity of any transaction Clarion is involved in, you will arrange for the individual to abstain from any involvement in the decision making and hold any information you may have regarding the transaction as confidential.



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RAISING CONCERNS

If you have a query or concern or wish to escalate a situation that you are uncomfortable with (“whistleblowing”), please contact our Director of Audit. You must report to us any corrupt or illegal practice in connection with your business with us. You should never be obliged to commit a breach of the law to retain Clarion’s business.

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