National Housing Federation (NHF) Code of Conduct for Board and Committee Members 2026

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Introduction

What is the Code of Conduct?

This Code of Conduct (hereafter referred to as the code) sets out the behaviours and standards of conduct that are expected of Magna's Board and Committee Members.

It is not the role of the code to set out how Magna should make decisions, but it does explain how individual Board and Committee Members involved in making those decisions should behave.

This code does not prevent anyone from exercising their rights, and in fact encourages them to do so (as set out in section H). This includes the right of customers to make complaints and the right of all involved to use Magna's whistleblowing procedure.

This code is an adapted version of the National Housing Federation (NHF) Code of Conduct 2026. It is a companion document to the NHF Code of Governance, and the two are designed to be used together.

This Code and associated arrangements will be reviewed every three years, or earlier if required by changes in legislation, regulation, NHF guidance or Magna's governance framework.

How does the code fit with other policies and procedures?

The code is intended to form part of the wider suite of policies and procedures which Magna has in place, setting out how things happen within the organisation. It also sits alongside regulatory and legal expectations.

The code is written on the assumption that Board and Committee Members will comply with all legal and regulatory requirements relevant to this code and with all Magna's policies, procedures and employment contracts[1].

Responsibilities of Magna's Board

Magna's Board is ultimately responsible for the actions, policies and work of the organisation. It is the board's responsibility to make sure that all those concerned can comply with this code.

Magna's board and senior staff have a responsibility to set an appropriate framework of policies, delegations and procedures. They must promote an organisational culture founded on openness, respect and accountability to customers.

[1] The code is a non-contractual Code of Conduct which sets out expected standards of behaviour for those within its scope. It may be taken into account when considering conduct, capability, governance or disciplinary issues, but it does not form part of an individual's contract of employment.

How the code is structured

There are five parts to the code:

1. **Acting in the best interests of customers and Magna**

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

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 Magna depend 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 customers and staff of Magna. 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 Magna'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 customers and staff. 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.

Application of the code

The code cannot aim to cover every situation in which people may find themselves as they perform their roles.

Even where it does not contain specific requirements, you need to apply good judgement, using the principles of the code. For example, it will be important in any situation to consider how an action taken or decision made aligns with Magna's purpose and values, and what impact it may have upon customers and Magna's reputation.

Compliance with the code

To support compliance with this Code, Magna will:

- Require all Board and Committee Members to confirm their commitment to this Code when it is adopted and whenever it is updated.
- Require all new Board and Committee Members to acknowledge and agree to this Code as part of their induction and appointment process.
- Refer to this Code within Board and Committee Member appointment documentation.
- Provide regular reminders and development opportunities to help Board and Committee Members understand and comply with this Code.
- Make this Code publicly available on Magna's website and available to Board and Committee Members through Magna's governance system.
- Include compliance with the Code as part of the annual appraisal process for Board and Committee Members.
- Monitor themes, concerns and learning arising from the operation of this code and report them periodically to the Governance and Remuneration Committee.
- Review the Code periodically, and at least every three years, to ensure it remains up to date and fit for purpose.

Raising Concerns and Alleged Breaches

Anyone wishing to raise a concern about the conduct of a Board or Committee Member may contact Magna's Company Secretary at governance@magna.org.uk.

Concerns and alleged breaches of this Code will be considered in accordance with Magna's existing governance arrangements and other relevant policies and procedures. Depending on the nature of the concern, this may include Magna's **complaints**, **whistleblowing** or other applicable processes.

Concerns about Board or Committee Members, including the Chief Executive, will be referred to the Chair of the Board. Concerns relating to the Chair of the Board will be referred to the Chair of the Governance and Remuneration Committee.

The Governance Team will maintain a record of concerns raised under this Code and will provide periodic reports to the Governance and Remuneration Committee, including any themes, actions taken and lessons learned.

This Code applies only to Board and Committee Members. Any concerns relating to the conduct of individuals outside the scope of this Code should be addressed through Magna's existing people, grievance, complaints or whistleblowing procedures, as appropriate.

NHF Code of Conduct for Board and Committee Members

1. Acting in the best interests of customers and Magna

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

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 customers as a whole and are in the best interests of Magna.

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 Magna's strategic objectives, reflecting Magna'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 customers.

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.

B. Representing Magna

The principle

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

B1 In representing Magna, 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 Magna into disrepute through dishonest, misleading or inappropriate behaviour.

B3 You must not make knowingly false, malicious or misleading statements about Magna or those connected with it.

B4 You must not seek to officially represent the views or position of Magna unless authorised to do so.

B5 When representing Magna 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 Magna, you must make it clear in what capacity you are communicating.

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

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 Magna depends 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 Magna and your personal interests, other duties and relationships.

C1 You must formally declare to Magna, 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 customers as a whole and of Magna; 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 Magna where this could reasonably be perceived to influence your role. You must not be involved in decisions relating to their relationship with Magna or seek or accept preferential treatment for them.

C3 You must declare any known relationship to a member of staff or board member where this could reasonably be perceived to influence your role. You

must not be involved in decisions relating to their relationship with Magna 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 Magna and must not be involved in their appointment, performance management or reward.

C5 Except where specifically permitted, as set out in Magna'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.

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

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.

D. Bribery, gifts and hospitality

The principle

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

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 according to Magna's policies.

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 the appropriate person.

E. Funds, resources and personal benefit

The principle

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

E1 You must ensure that Magna's funds and resources are used properly and efficiently.

E2 Your procurement decisions must be guided by Magna's policies and fairness in decision-making and in line with relevant law.

E3 You must take all reasonable measures to protect Magna'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 Magna's policies and procedures.

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.

F1 You must not disclose, without the required permission and authority, any personal data about customers, staff or colleagues. This duty continues to apply after you have left Magna 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 Magna 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 Magna, unless you are doing so in accordance with Magna'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 customers

The principle

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

G1 You must seek and value views from customers when making decisions that will affect them.

G2 You must not allow any personal relationship with a customer 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, customers.

G4 You must handle customers' money only where absolutely necessary and ensure that a receipt is completed for every transaction. In any event, you must operate in accordance with Magna'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.

G6 You must maintain appropriate boundaries with staff and customers and must not allow personal relationships to influence how you carry out your role.

H. Reporting concerns

The principle

You must report to the appropriate person within Magna any reasonable suspicions you have about possible wrongdoing in line with this code or Magna's relevant policies and procedures.

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

I. 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.

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 Magna's workplace or use language in the performance of your role which other people might reasonably find offensive.

I6 You must report through appropriate channels any instances of unfair or unequal treatment associated with Magna and, where it is your role to do so, you must investigate any such reports thoroughly, with compassion and respecting confidentiality.

J. Professional relationships

The principle

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

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, maintaining independence and integrity at all times. You must conduct relationships with other people who hold roles at Magna on an appropriately professional footing.

J3 You must challenge language or behaviours that reinforce stigma about customers 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.

J5 Your relationships with staff and customers 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 Magna.

J7 Where it is necessary to raise issues of staff, 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 member of staff or contractor.

4. Taking responsibility for the impact of your actions

You have a responsibility while on Magna'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 customers.

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.

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 Magna, you must report this immediately through the appropriate channels.

M. Environment and sustainability

The principle

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

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 customers, staff and Magna from harm.

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 Magna. 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 Magna'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 customers and staff. This includes taking responsibility for your own performance and for meeting relevant professional standards.

O. Learning and development

The principle

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

O1 You must play an active part in Magna's supervision and performance appraisal processes as they apply to your role.

O2 You must make personal training and development needs relevant to your role known to Magna 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.

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 Magna and the wider sector(s) within which it operates.

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.

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 customers, services, safety or the reputation of Magna.

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 Magna to continue to improve outcomes.

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 this Code of Conduct.

Board

Magna's Strategic Board. The Board takes responsibility for setting our vision, ensuring our mission is focused on the needs of our customers, and our values support the culture of the business. The Board also ensures that we operate as an ethical business, with a culture of inclusion, integrity, openness and accountability.

Board member

Includes all members of our Strategic Board. Apart from the Chief Executive, all board members are non-executive directors.

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.

Culture

Organisational culture can be simply described as 'how we do things around here' - it's the sum total of shared values, attitudes and behaviours that shape how people perform their roles in a housing association and how customers experience the services they receive.

Housing association

Housing associations are independent, non-profit making, social landlords.

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.

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.

Customers

Throughout the code, we use the term ‘customers’ to include residents, tenants, leaseholders, shared owners and users of other services provided by Magna.

Staff member and staff

Includes Magna’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.

Strategic objectives

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