

# ESG

Environmental, Social & Governance

2024 - 2025

# INTRODUCTION FROM THE CHIEF EXECUTIVE

**Now more than ever, our environmental, social and governance principles are central to how we create meaningful, lasting impact for our tenants and communities. This is more than meeting standards, this is about supporting our tenants through cost-of-living challenges, improving energy efficiency so our homes are cheaper to heat and ensuring transparency and accountability in the way we work.**

This year's ESG report reflects on our activities during the final year of our corporate plan to 2025, Making What Matters Brilliant, where we pledged to make a substantive and positive difference to the things that matter most to our tenants. This plan spanned a global pandemic, unprecedented world events and the most intense scrutiny on our sector we have ever experienced.

Within the report, you will see that despite these challenges, we achieved all we said we would during this plan, with the final year one of record-breaking achievements, including 813 new, affordable homes handed over to tenants. The most we have ever done in a single year.

From investing in energy-efficient upgrades to supporting community-led initiatives, we've also taken tangible steps to ensure our sustainability efforts translate into real-world benefits. We know that a well-insulated home isn't just good for the planet, it's essential for wellbeing and financial security, and so, we've worked exceptionally hard to ensure all our homes are rated at EPC D, with c80% at EPC C, years ahead of our 2030 target.

Strong governance continues to underpin everything we do. We remain committed to transparency, accountability and ethical decision making, ensuring that our policies and practices reflect the priorities of those who live in our homes. This is evidenced by our recent G1, V1, C1 regulatory gradings from the Regulator of Social Housing, a great achievement for our colleagues and a reassuring signal for our tenants.

Within this report I hope you'll see the strong foundations we've built, the very foundations that have propelled our new corporate strategy, Tenants at Heart.

This new strategy to 2030 builds on the successes of Making What Matters Brilliant, now with a sharper, unwavering focus on putting tenants' priorities at the centre of everything we do.

Many of our homes are among the oldest in the sector, a reflection of our proud history as an organisation now over 100 years old. Since our founding, our focus has been on building homes to meet urgent need. Today, that focus has evolved: our priority is to improve and future-proof those homes. A significant challenge, but also a unique opportunity to invest in the character and legacy of our homes, while ensuring they meet modern standards and continue to serve our communities for the next century.

To support this ambition, we're making a record investment in the quality of our tenants' homes, committing £60 million annually to a comprehensive programme of retrofit works that boost energy efficiency, and a range of aesthetic enhancements to ensure these homes are places our tenants can truly be proud of.

As we look ahead, we know there is a lot to do, and our new corporate plan looks to tackle this head on. But for now, this report is a testament to the dedication of our teams over the last 12 months, the strength of our partnerships, and the trust placed in us by our tenants.

**GLENN HARRIS**

**CHIEF EXECUTIVE**

**Environmental, social and governance are more than just words on a page, they're impactful issues that Midland Heart manages to make sure tenants have a warm and comfortable environment to call home for years to come.**

Midland Heart's ESG report evidences all of the work being done to make homes more affordable to run, communities safer to live in, and above all, to ensure the organisation's governance and policies reflect the priorities of tenants.

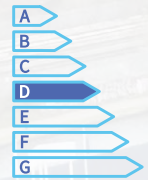
This year's report is no exception, and I'm encouraged by the steps Midland Heart has taken to invest in creating an organisation that is resilient and sustainable for years to come, improving the energy performance of homes, and involving residents in shaping decisions that affect their lives. It's clear that ESG isn't just a corporate issue, it's a commitment to doing right by the people and spaces that matter most.



**CHAIR OF MY IMPACT  
TENANT GROUP**

**TREVOR STANLEY**

# OUR CORE PERFORMANCE



**c100%**  
of our homes are now  
**EPC D** or above



**c79%**  
of our homes are now  
**EPC C** or above



**100%** across all  
**SRSSH core** and  
**enhanced** building  
safety criteria



Installed a combined  
**maximum peak**  
**output of 70kW**  
of solar PV on our offices



**c20,000**  
**tonnes CO<sub>2</sub>**  
**emissions**  
reduction since 2019-20



**SHIFT**  
**Environment**  
**Gold** award 2025



**813** new  
**energy efficient**  
**affordable homes**  
handed over to tenants



**89%** Overall  
**tenant satisfaction**



**Maximised**  
**customer income**  
**by £3.4m**  
through our Money Advice Team



Invested **£2m** in a pilot to  
**Modernise c50**  
**of our oldest homes**



**£2.4m** drawn down for  
**Warm Homes Wave 2**  
delivery across **182 homes**



**G1 V1 C1**  
from the Regulator of Social  
Housing and Moody's **A1**  
Stable Credit Rating

# INTRODUCTION

## ABOUT THIS REPORT

Housing Associations continue to operate in a constantly changing environment. Regulatory changes, minimum training and qualification requirements, and consultations on a revised Decent Homes Standard, and a Minimum Energy Efficiency Standard (MEES) continue to drive change in the sector. Begun by the response to the Grenfell Tower Fire and the building safety issues uncovered, concern expanded into how tenants were being treated by their landlords, coupled with the need to address climate change.

In our Making What Matters Brilliant corporate plan, we focused on being a top-class landlord first and foremost and we were rewarded with a C1 grade from the regulator, to add to our existing G1 and V1 grades, and A1 stable credit rating. Proving positively that we are on the right track in how we listen to and respond to our tenants' concerns.

At the heart of this report is our belief that tenants must come first, second and third. By aligning our ESG strategy with both regulatory requirements and our tenant focus, we aim to demonstrate not only compliance but also leadership in building resilient, thriving localities.

In line with reporting standards, including the Sustainability Reporting Standard for Social Housing (SRS) and wider ESG frameworks, we are enhancing the way we measure, manage and disclose our environmental and social impact. This report reflects our ongoing work to meet these expectations, while also preparing for forthcoming regulatory changes, consumer standards and transparency.

## ABOUT US

Our legacy since 1925 has always been to provide safe, well-maintained and affordable homes, and this continues to be the essence of who we are and what we do. We operate in some of the most challenging and deprived urban neighbourhoods, with some of the most diverse communities in Europe and have some of the oldest properties of any housing association in the country.





# OUR APPROACH TO ENVIRONMENTAL, SOCIAL AND GOVERNANCE

## LISTENING TO OUR TENANTS

We ensure our tenants' voices are heard throughout our governance arrangements, including at our Board and its Committees. Quarterly Board tenant insight reports inform on the ways we have engaged and used tenants' views and include regular reporting on the outcomes of tenant scrutiny activity through our Operations Committee.

Our My Voice framework was set up to provide a range of ways for tenants to get involved. This includes activities tenants can do from home, at organised meetings, and in their local area.



We continue to evolve our tenant-centric approach to sustainability through the framework. This year we:

- Engaged tenants in key tenders like grounds maintenance (c700 tenants) and programme specifications like Modernisation (c50 homes) to understand what matters to tenants across sustainability-related issues like quality green spaces and thermal efficiency standards in modern homes.
- Presented our waste solution and new brokerage contract to the My Impact group to inform tenants and receive valuable feedback for its implementation. Also, conversing on how we can support tenants with upcoming Simpler Recycling changes from local authority waste provisions.
- Asked the My Impact group what they would want to see prioritised in the development and delivery of the new 'our carbon reduction plan' to 2030 to be published in 2025.
- Continued the energy scrutiny project with the My Scrutiny group to understand and assess how their experiences with energy use and temperatures in schemes can be better suited for a more comfortable environment.
- Embedded tenant offers for social value in our procurement and contract management frameworks. Providing a central database of offers to link to tenant-facing programmes and events.

# GOVERNANCE AND ASSURANCE

## – CREDIBLE ACCESSIBLE REPORTING

As a G1, V1, C1 and Moody's A1 Stable rated organisation we are committed to the principles of good corporate governance and achieving high standards of business integrity, ethics and professionalism in everything we do.

- We are a voluntary adopter, supporter and contributor to the Sustainable Reporting Standard for Social Housing (SRSSH) - supporting consistent, reliable, and quality sector reporting.
- We have embedded the United Nations Sustainable Development Goals (SDGs) into our strategic reporting commitment at the highest level.
- Our carbon targets are aligned with Paris-proof pathways to net zero and our energy & carbon reporting is compliant with Streamlined Energy & Carbon Reporting (SECR).
- Our reporting is aligned to elements of the Task Force on Climate-Related Financial Disclosures (TCFD) and the International Sustainability Standards Board (ISSB) and International Financial Reporting Standards (IFRS) S1 and S2.
- Core components of our reporting is quality assured by second-party audits.

We have committed to a minimum 3-year partnership with SHIFT Environment, a specialist environmental consultant, to annually review our environmental sustainability performance and benchmark us against our sector peers. SHIFT provide limited assurance on environmental data including validation of our carbon emissions disclosures.

### Our Executive Sponsorship

#### The homes we rent



**Sayeed Harris**  
Executive Director of  
Property Services



**Daren Nowlan**  
Executive Director of  
Tenancy Services

#### The homes we build

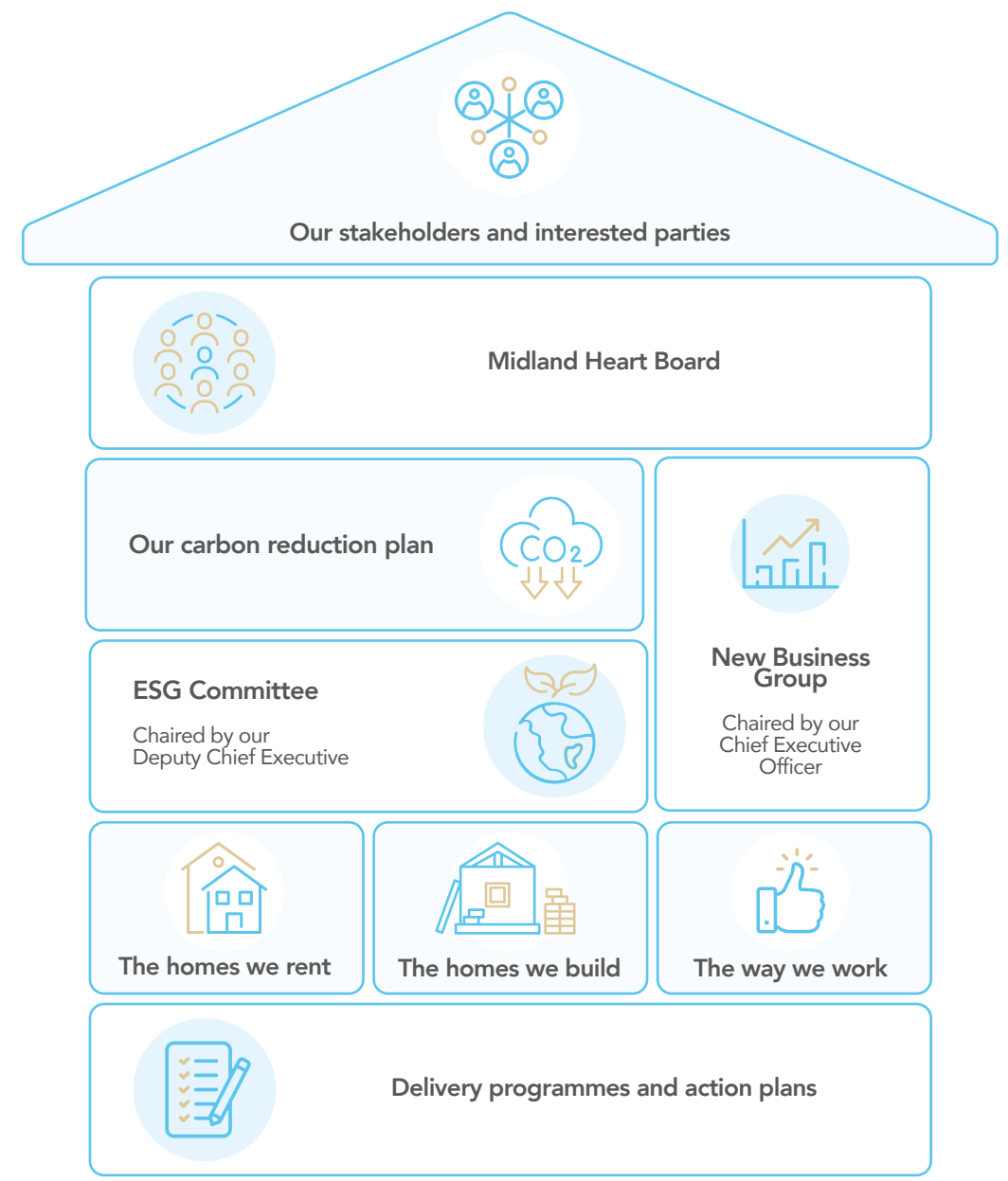


**Joe Reeves**  
Deputy Chief Executive  
& Executive Director of Finance  
& Growth

#### The way we work



**Baljinder Kang**  
Executive Director of  
Corporate Resources



Our ESG Committee steers ESG and our target to reach net zero in the homes we rent, the homes we build and the way we work by 2050. The ESG Committee is chaired by our Deputy Chief Executive and leader of our Finance & Growth directorate. Convening bi-monthly, it hosts strategic senior leaders, providing a platform to generate ideas, evaluate performance and define strategy, focused on our progress towards key corporate targets including our energy performance in our homes and operations.

The New Business Group, chaired by our Chief Executive, is accountable for the selection and evaluation of key new build development projects using guidelines approved by the ESG Committee.

Our Value for Money (VFM) steering group underpins sustainability, while working to secure direct benefits for tenants through strategic decision making. The VFM steering group is led by our Deputy Chief Executive and leader of our Finance & Growth directorate and convenes frequently.



# CLOSING MAKING WHAT MATTERS BRILLIANT AND OUR CARBON REDUCTION PLAN 2021-25

We completed our sixth and final year of Making What Matters Brilliant in 2024-25. Our financial resilience and underlying strength have allowed us to continue to invest in tenant and digital services, our front-line operations, new and existing homes, building safety, energy performance and climate change mitigation.

In 2021 we published our first plan to reduce the environmental impact of our organisation in homes we rent, the homes we build and the way we work. Since the start of our Carbon Reduction Plan, we have made significant progress centred around forming a strong base to build the vital next steps of our tenant-focused sustainability journey. In Our Carbon Reduction Plan to 2025 we achieved...

## The homes we rent



Achieved our existing home and new build energy efficiency and affordability targets.



Achieved our target of c100% EPC D or above in all our homes



Delivered c£4.6m of grant through Social Housing Decarbonisation Fund Waves 1 & 2



Energy efficiency measures a key part of our planned improvement programmes



Achieved national recognition for a first-of-its-kind large scale domestic Demand-Side Response (DSR) pilot

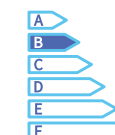
## The homes we build



Built robust governance and reporting frameworks aligned to sector, national and international recognised standards.



Delivered Project 80, the first homes to meet the Future Homes Standard in the United Kingdom



Built 4,000 new mostly EPC band B energy efficient and affordable homes



Piloted methods of construction with industry partners to build homes that have less embodied carbon emissions



Linked £300m of loan facilities to our performance like building high volumes of energy efficient affordable homes.

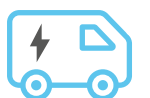
## The way we work



Received a SHIFT Gold accreditation to validate our strong sustainability performance.



Achieved EPC B in all our offices through a c£400k investment in energy efficiency



Placed our first substantial order of 16 fully electric vans into our In-House Maintenance fleet



Delivered a £3.4m move of the West Midlands office and depot facility to a new geographically positioned site and upgraded energy efficiency



Delivered our first sustainability focused e-learning course to colleagues



Introduction



Closing MWMB & Our  
Carbon Reduction Plan



Sustainability  
Reporting Standard



Sustainable Finance  
& Impact Report



Looking ahead  
to our new Plan



Appendix

## SUPPORTING VULNERABLE TENANTS THROUGH WAVE 2

We have maximised £2.4m in the Social Housing Decarbonisation Fund Wave 2 grant and independent financing to install tenant-centric energy efficiency improvements.

With Lovell, we targeted measures in two specialist accommodation and one general needs scheme, supporting some of our most vulnerable tenants with thermal comfort and solar PV solutions.

The mostly EPC D homes moved to bands C to A.

The tenants who live in them aren't going to be disturbed by any energy efficiency-related work anytime soon.



"They delivered such a good service. The team were super polite, explained all that was being done thoroughly, and cleaned up after the works. It was such a smooth and positive experience, thank you!"

Midland Heart tenant



**Highly Commended - National Retrofit Academy Awards 2025**  
(Best Social Housing-Led Retrofit Programme)



**Highly Commended - Energy Efficiency Awards 2025** (Regional Large-Scale Project of the Year)

# THE SUSTAINABLE REPORTING STANDARD FOR SOCIAL HOUSING

**We are a voluntary adopter and funder of the Sustainability Reporting Standard for Social Housing (SRSSH).**

The SRSSH provides a voluntary framework for housing providers to report on their ESG performance transparently and consistently. Through the SRSSH we are contributing to consistent, reliable, and quality sector reporting.

This year is our fourth ESG Report aligned to the SRSSH framework and its embedded United Nations Sustainable Development Goals (SDGs) since we started as an early adopter in 2020.

To comply with the requirements of the SRSSH v2.0 we have responded to all of the 46 core criteria and responded to the enhanced criteria where available and relevant.

A summary of key criteria has been provided in this Report under an appendix. You can also find the published Disclosure Against Criteria (v2.0 input tool) template with our complete responses on our **Investor Hub** and answers in the Appendix.

## UNITED NATIONS SUSTAINABLE DEVELOPMENT GOALS IN FOCUS

We have embedded the SRSSH aligned United Nations (UN) Sustainable Development Goals (SDGs) in our strategy and reporting, providing annual updates on our performance.

The SDGs are a set of 17 interconnected goals adopted by the UN in 2015 to achieve a better and more sustainable future for all by 2030. They address global challenges like poverty, inequality, climate change, environmental degradation, peace, and justice. The central aim of the SDGs is to “leave no one behind” and “reach the furthest behind first”.

Since 2019 we have taken considerable steps to achieve the SRSSH aligned SDG targets.

| SDG goal & target(s)                                                                     |                      | Policy or Measure                                                                                                                                                                                                                                                                   |
|------------------------------------------------------------------------------------------|----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  8    | 8.5                  | <ul style="list-style-type: none"> <li>10.02% Median Gender Pay Gap,</li> <li>11.32% Median Ethnicity Pay Gap</li> </ul>                                                                                                                                                            |
|  10  | 10.1<br>10.2         | <ul style="list-style-type: none"> <li>39% of colleagues who are currently receiving investment in their formal development are ethnically diverse.</li> <li>£3.4m income maximisation secured for tenants and 100% tenancies sustained through our Money Advice Team</li> </ul>    |
|  11 | 11.1<br>11.3         | <ul style="list-style-type: none"> <li>99.99% Decent Homes compliance and 100% building safety compliance*</li> <li>813 new affordable homes built</li> </ul>                                                                                                                       |
|  12 | 12.5<br>12.6<br>12.7 | <ul style="list-style-type: none"> <li>100% landfill diversion for our office wastes</li> <li>Annual disclosures using the Sustainable Reporting Standard for Social Housing</li> <li>All new key supplier tenders use the Sustainable Procurement Framework</li> </ul>             |
|  13 | 13.2                 | <ul style="list-style-type: none"> <li>Current Carbon Reduction Plan and Tenants at Heart corporate sustainability commitments</li> </ul>                                                                                                                                           |
|  15 | 15.5<br>15.9         | <ul style="list-style-type: none"> <li>Learnings from our quality, accessible and nature friendly green space pilot considered in our new Grounds Maintenance specification.</li> <li>10% Biodiversity Net Gain attainment policy outlined in our new Development plans.</li> </ul> |
|  16 | 16.9                 | <ul style="list-style-type: none"> <li>We have the highest G1 V1 C1 rating from the Regulator of Social Housing</li> </ul>                                                                                                                                                          |

\*Across the SRSSH core and enhanced criteria for building safety metrics

# ENVIRONMENT AND ENERGY

## REDUCING CARBON EMISSIONS

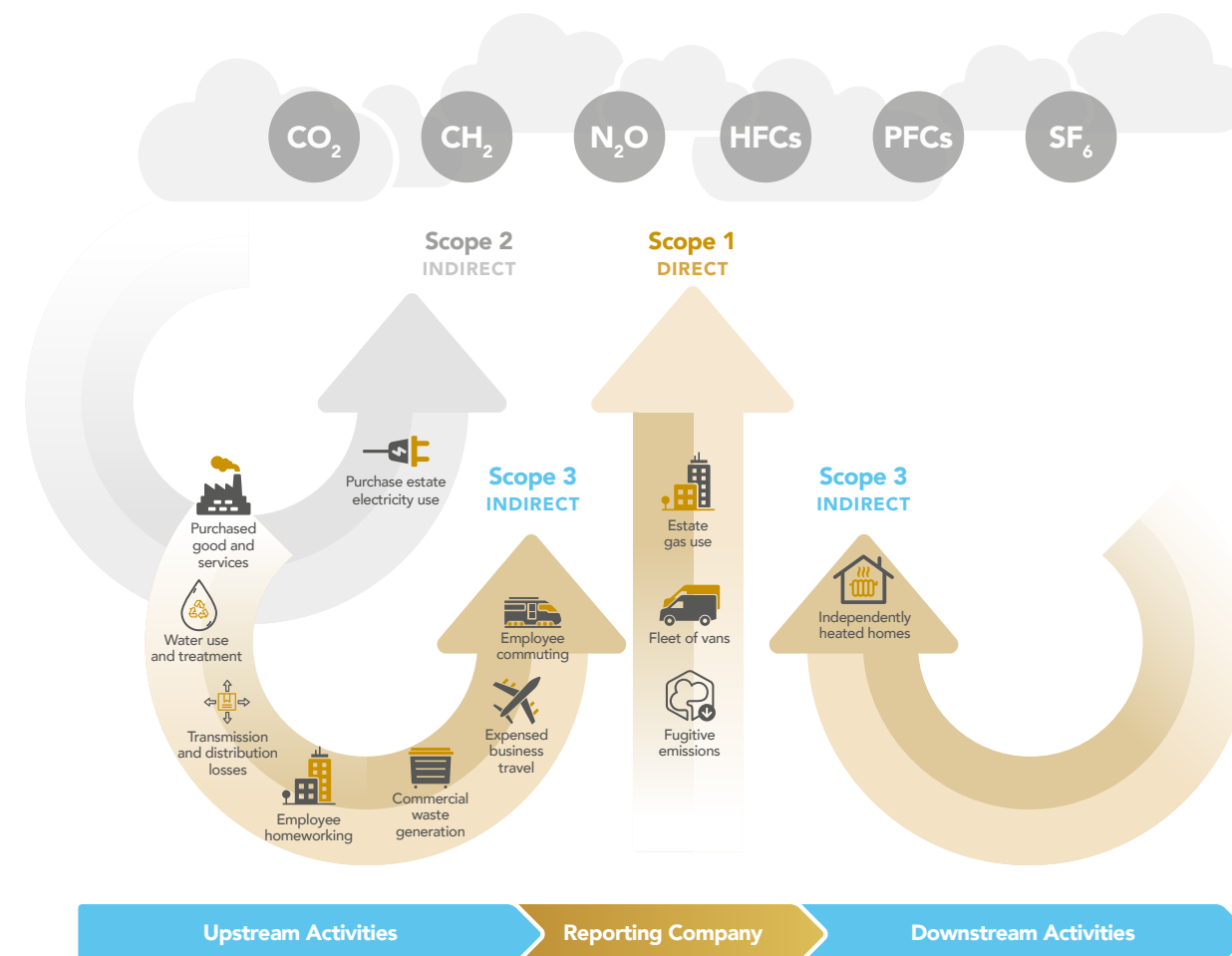
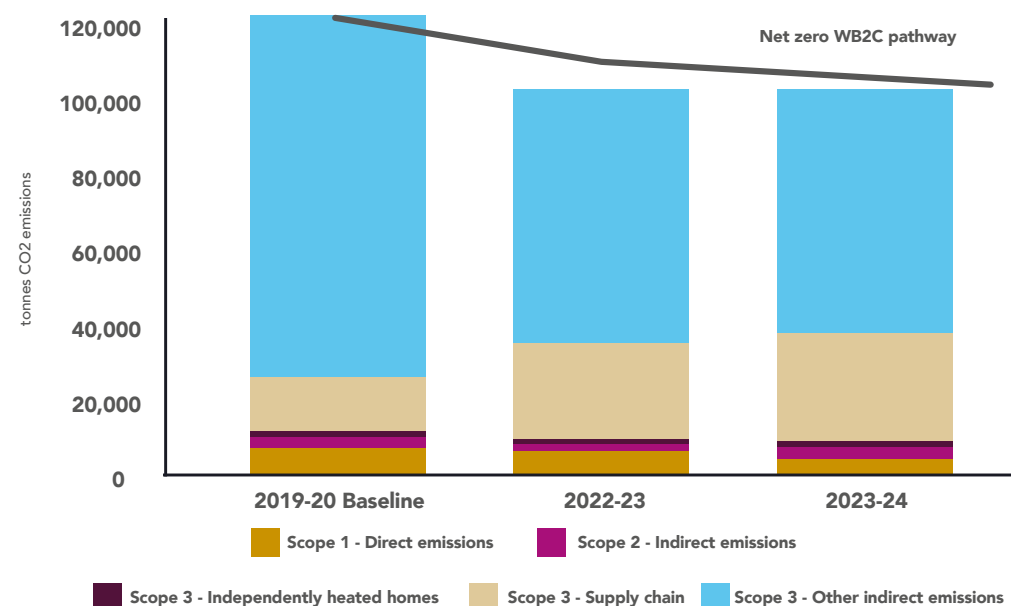
Our total CO2 emissions were 103,963 tonnes, representing a small increase of 195 tonnes compared to last year. Despite this rise, we remain around 20,000 tonnes below our 2019–20 baseline and are still on track to meet our science-based Well Below 2°C (WB2C) net zero target for 2050.

### Key Drivers of Change

- **Property portfolio simplification** – The sale of properties last year, which accounted for around 55% of our landlord-supplied energy, led to significant reductions in our Scope 1 and 2 purchased energy emissions.
- **Fleet and travel emissions** – Scope 1 fuel use from our van fleet increased by 49 tonnes, reflecting a higher number of jobs attended by operatives. Expensed fuel use by colleagues also rose, driven by longer travel distances linked to large new build schemes and survey work.
- **Home energy efficiency** – Improvements to independently heated homes delivered a combined 2,634-tonne reduction in Scope 3 emissions. We have now reached c100% EPC rating D or above, with c80% at EPC C or above.
- **Supply chain emissions** – Emissions from our supply chain increased. This reflects the nature of high-value contracts from large-scale investment in property maintenance and development, which are construction-based and carry a high level of embodied carbon. Restatement of Baseline Comparison.

In 2023–24, we reported a 25,000-tonne reduction in CO2 emissions relative to our 2019–20 baseline. Following recalculation of Scope 3 supply chain emissions, using updated 2023 and 2024 conversion factors and adjusted inflation factors, this reduction has been restated as approximately 20,000 tonnes. Our revised 2023–24 total is 103,767 tonnes of CO2 emissions.

### Pathway to net zero



### Methodology statement

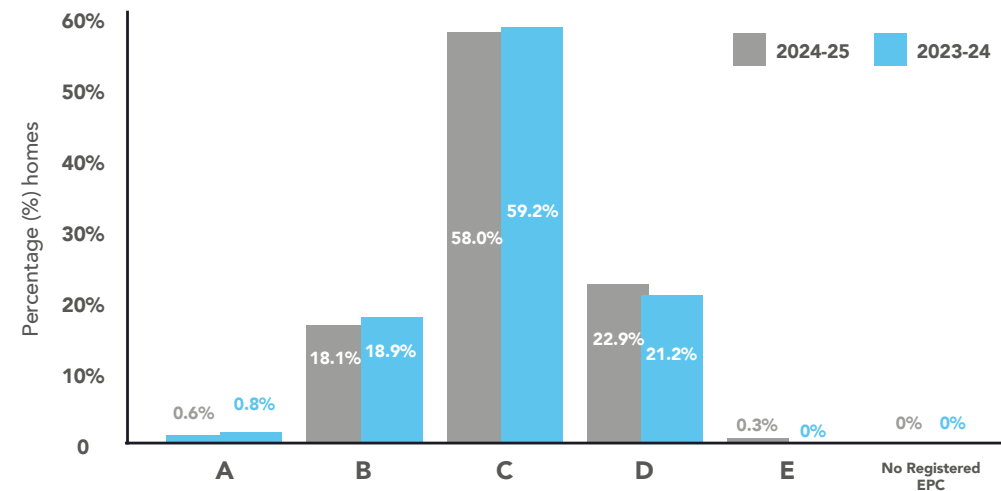
Greenhouse gas (GHG) or CO2 emissions are calculated in line with the GHG Protocol methodology. These are disclosed annually and include Scopes 1, 2 and 3 and a relevant intensity metric to the sector. Scope 3 emissions are industry relevant, including independently heated homes. A historical period and baseline are used in reporting and to evidence trend analysis.

The chosen intensity ratio is the total tonnes CO2 emissions (market based) per home, providing effective benchmarking of our performance within the social housing sector. Scope 3 emissions have been reported for the assessed scope 3 categories and activities using the GHG Protocol: Technical Guidance for Calculating Scope 3 Emissions. Homeworker emissions use an 'enhanced case' market-based approach to record energy use at home. For the purposes of SECR we included Category 6: Business travel, omitting other associated categories.

We have continued our work with SHIFT, a leading consultant to social housing, to provide assurance of our methodologies and data. We regularly review our alignment to the GHG Protocol Accounting and Reporting Principles and the UK Government's Environmental Reporting Guidelines. We used the 2024 Defra conversion factors to calculate associated tonnes CO2 emissions equivalents.

# ENERGY EFFICIENCY IN OUR HOMES

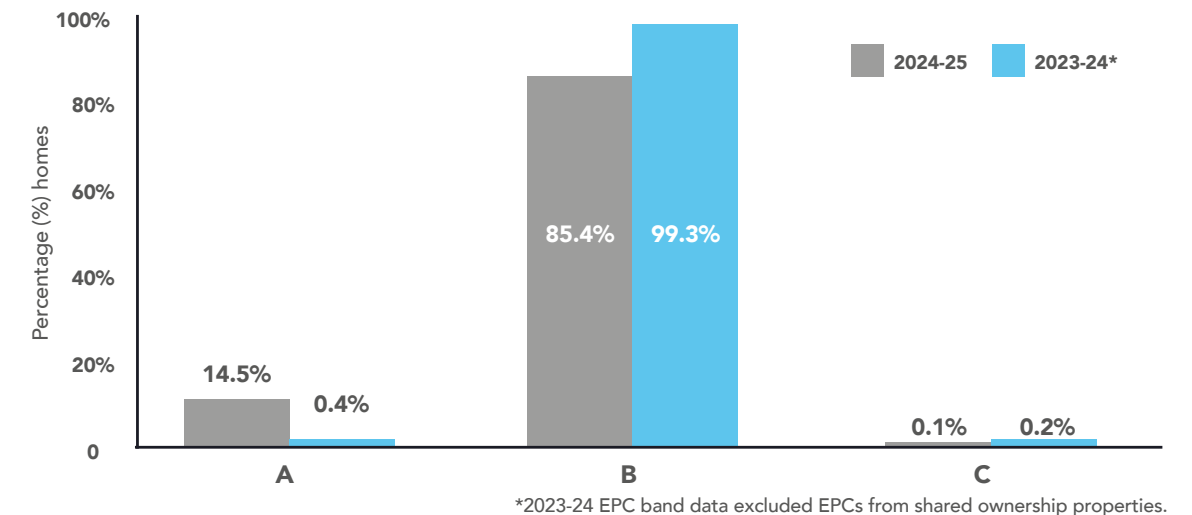
## The EPC bands of our existing homes



Average SAP was 73.5 compared to 73.0 in 2023-24.

- Circa 2,500 energy efficiency measures delivered to over 1,500 homes and tenants like solar PV, loft insulation, triple glazing and new boilers. We have found that many homes have moved from EPC band D into EPC bands B and A through the more advanced measures.
- Circa 800 homes were re-assessed and or managed for RdSAP10 changes. RdSAP10 is the newest version of the Standard Assessment Procedure (SAP). The methodology that calculates EPC movements.
- Some higher EPC rated homes left the portfolio as part of the project to simply our operations and directly invest proceeds into new affordable homes and our existing homes.
- New dedicated resource built into our Property Investment team with new senior retrofit, commercial and contract management, and surveyor roles.

## The EPC bands of the homes we build



Average SAP was 85.8 compared to 83.8 in 2023-24

- 813 new affordable energy efficient homes through a £115m regional investment.
- An increase in EPC band A homes was delivered through a higher proportion of homes built to the latest Building Regulations.
- Some EPCs remained lower than average for homes built under the latest Building Regulations SAP outcomes because of how electric heating systems are calculated under the new SAP10.
- This year's handovers included our Barnsville Close scheme in partnership with Saint Gobain. The scheme is fully electrically heated with new designs for fabric and construction to reduce environmental impact and increase performance.



# BENCHMARKING OUR PERFORMANCE



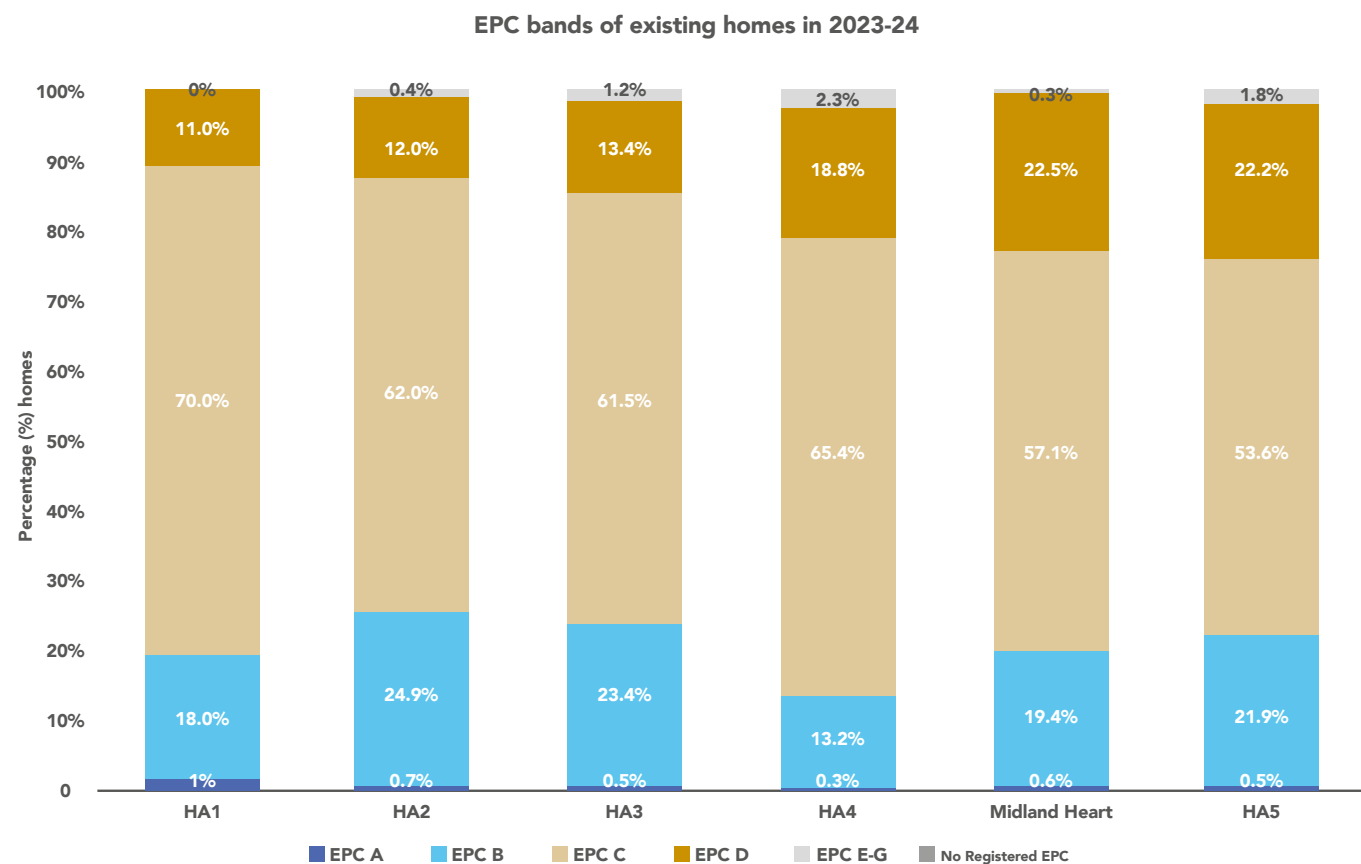
SHIFT, part of SUSS Housing Ltd, is a specialist environmental consultant to the social housing sector. This is our 4th year working with SHIFT to audit and benchmark our environmental performance, and receive limited assurance on our externally reportable environmental information.

The SHIFT accreditation scheme audits key environmental issues for landlords to assess data credibility and performance against sector standards and expectations. It also scores landlords with bronze, silver, gold or platinum depending on performance. SHIFT audits us alongside c70 landlords.

We have maintained our Gold accreditation for 2025 and ranked 8th out of the last 40 landlords to be audited. Last year, in 2024, we first achieved Gold and ranked 12th.

## EPC bands of our existing homes in 2023-24

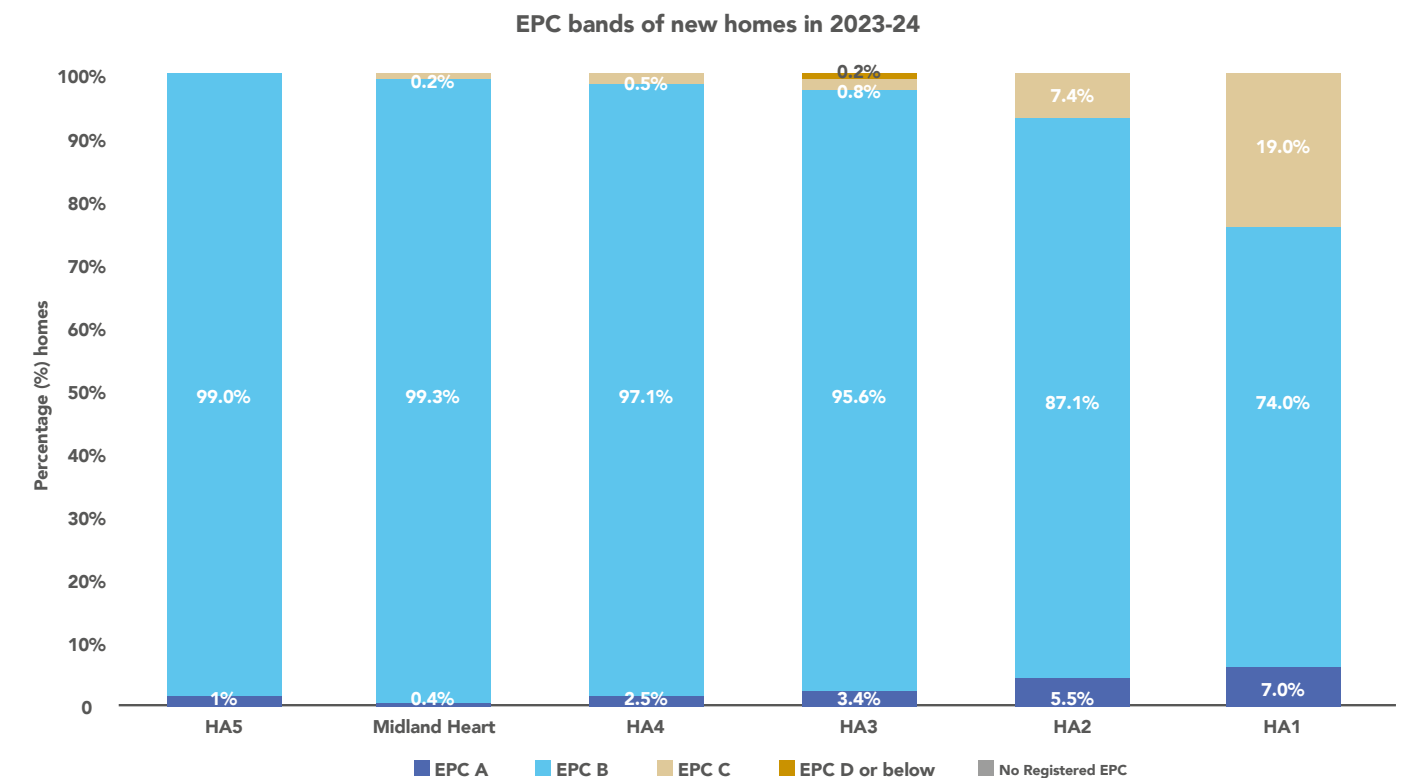
We continue to perform above average for the number of homes we have that are EPC band C or above. We have one of the highest proportions of pre-First World War homes out of our peers in the UK, making achieving EPC C or above and net zero carbon emissions a unique challenge.



## EPC bands of our new homes in 2023-24

With only 0.2% of our homes built to EPC C or below in 2023-24 we maintained a high level of energy efficiency in our construction of affordable homes in the Midlands.

This year we have significantly increased the number of EPC A homes built to 14.5%. Our 2024-25 profile includes all shared ownership homes.



## Our benchmarking group

Housing Association (HA) peers were selected based on scale and geography of homes. The group is expanded for internal review and will be subject to further evaluation of relevance. All data for benchmarking is from direct input from peers into the SRSSH input tool or our annual assessment under the SHIFT accreditation. All data shared by SHIFT is anonymised.

### HA1

c45,000 homes  
c1,000 homes new homes built  
Midlands and East region

### HA2

c45,000 homes  
c1,000 homes new homes built  
Midlands region

### HA3

c40,000 homes  
c1,000 homes new homes built  
South West region

### HA4

c35,000 homes  
c1,500 homes new homes built  
South region

### HA5

c50,000 homes  
c1,000 homes new homes built  
Midlands region

### Midland Heart compared

c35,000 homes  
c800 homes new homes built  
Midlands region

## Understanding climate risk

Our Risk Management Policy defines our framework for identifying and managing strategic and operational risks. The Board, along with the Audit and Risk Committee, oversee our strategic risks quarterly and this includes reviewing our transitional risk around decarbonisation and emerging risks such as increasing severe weather events and key policy change.

| Risk category                       | Risk area                                                                                                                                                                                        | Adaption and mitigation measures                                                                                                                                                                                                                                                                                                                        |
|-------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Strategic<br>(current and emerging) | <ul style="list-style-type: none"><li>• Transitional risk around decarbonisation</li><li>• Increasing severe weather events (emerging)</li><li>• Upcoming key policy change (emerging)</li></ul> | <ul style="list-style-type: none"><li>• Low carbon as a key priority in the Corporate Plan</li><li>• ESG Committee governance and reporting to Board</li><li>• £72m in the Business Plan for EPC C in all our homes by 2030</li><li>• Professional resource for managing climate related issues (eg Retrofit, Building Safety, Repairs, etc.)</li></ul> |
| Operational<br>(current)            | <ul style="list-style-type: none"><li>• Pluvial (surface water) and fluvial (rivers and seas) flooding</li><li>• Overheating/ excess heat</li><li>• Supply chain</li></ul>                       | <ul style="list-style-type: none"><li>• Tested Emergency Response Framework</li><li>• Up to date and utilised Asset Management system</li><li>• Partnerships with experienced contractors</li><li>• Flexible frameworks for supplier procurement</li><li>• Major material supplier network</li></ul>                                                    |

Physical climate change risk from pluvial and fluvial flooding and overheating is regularly assessed through our relationship with Insurers and SHIFT environmental consultancy. This year we recorded that 4% of our properties are at medium to high risk of pluvial and fluvial flooding and, according to SHIFT analysis, 12% are at medium to high risk of overheating.

Mitigation actions for physical climate change risk include measures within our New Build, Property Investment and Repairs programmes. For example, we are:

- Listening to our tenants’ comfort levels through specialist engagement and tenant satisfaction measures (TSMs)
- Installing temperature controls and ventilation systems to increase air flow and reduce the build-up of heat
- Updating specifications for kitchens and bathrooms to ensure that water use devices going into our homes are new and efficient, reducing water use and tenant bills
- Installing, where required, Sustainable Urban Drainage (SUDs) to manage surface water in our new build schemes.

## Understanding how we can create quality, accessible and nature-friendly green spaces



**Our communal green space is three times the size of Hyde Park in London. However, these spaces are made up of an urban mix of hard standing, small areas of grasses and shrubs at far less than 1 hectare each. This means we need to balance supporting local nature with making quality spaces that our tenants can access safely.**

Our green spaces pilot focused on making subtle changes to some of our communal green spaces to improve their look and feel through nature friendly enhancements. The enhancements included wildflower meadow seeding, native shrub planting and bird box installation.

The pilot had mixed results and feedback from tenants. These are learnings that we will take into our Grounds Maintenance contract specifications, localised investment activities and Biodiversity Net Gain (BNG) in new build developments to ensure tenants are satisfied with our communal spaces and how they are managed.

Our new build BNG policy states that we will comply with the 10% target where applicable. We will always try to maximise onsite BNG and then target local credits should that not be possible, ensuring that our tenants and communities always benefit from our investment in new homes.



## Upgrading our waste services

This year we have taken extensive steps to upgrade our waste management activities. Current and upcoming regulatory changes like Simpler Recycling are also impacting our commercial waste operation and how our tenants manage their domestic wastes.

Following a review of our waste services, we have taken key actions to ensure we meet our Duty of Care, drive value from contacts and engage tenants in waste and recycling.

- Our Waste Management Framework is installed in our Health & Safety (H&S) Contractor Competency Framework to set out core policy and guidance and integrate with regular checks by our H&S Team.
- New major waste-related contracts like within Property Services construction activities now have two contract waste Key Performance Indicators to evidence compliance with Duty of Care and drive performance and reduce waste to landfill.
- Our Executive approved the onboarding of a new waste brokerage contract to ensure all waste services, where relevant and viable, are within a single centralised system.
- We introduced tenants to the waste management upgrades through the My Impact group, so they can evaluate the value in the brokerage decision.



## Birmingham Bin Strikes

When Birmingham was hit by bin strikes, it wasn't just about uncollected rubbish – it was about the impact on communities, safety, and wellbeing. For Midland Heart tenants across the city, the situation quickly became a daily challenge, but thanks to the dedicated work of our rangers, we were able to take swift, practical action that made a real difference. Our rangers were out in force, responding quickly to rising refuse levels in communal areas.

In total, our teams coordinated the removal of more than 30 tonnes of rubbish. Proactively working alongside local authorities and contractors, the rangers arranged emergency collections where possible and supported alternative disposal solutions. Thanks to their efforts, tenants didn't just see a cleaner space – they felt valued, supported, and safe.

## Creating sustainable working environments



**Achieving our environmental objectives and improving the energy efficiency of our homes is not just the responsibility of individuals; everyone has a part to play. Our teams play a significant role in making sustainable working environments and homes and reducing our impact. This year we have:**

- Continued to roll out key sustainability checks in procurement and in the contract management.
- Worked with suppliers to identify and reduce the number of materials and substances that could be harmful to the environment. Our strict Control of Substances Hazardous to Health (COSHH) measures ensure that environment risks are managed effectively.
- Approved a new fleet plan and ordered 16 electric vans for our In-House Maintenance Team.
- Achieved successful outcomes through our Facilities & Offices Environment & Sustainability Plan include increasing the proportion of responsibly sourced facilities supplies that we have purchased from 33% in 2023 to 63% in 2025.
- Secured Renewable Energy Guarantees of Origin (REGO) certificates for the electricity used in our offices, which offsets carbon emissions at source.
- Targeted a reduction in water use (m3) by 10% by 2030 in our offices through our new Facilities & Offices Environment & Sustainability Plan. We have begun to switch manual taps for push taps to reduce the volume and cost of water used at our offices.
- Invested just under £100k to make our offices more sustainable working environments through the installation of a combined maximum peak output of 70kW of solar PV on our offices.
- Continually reviewed the quality of the products we put into our homes in our new build designs, and specifications for planned programmes and Homes for Modern Living pilot in existing homes.
- Continued to digitise our services through a 5-year procurement pipeline to onboard back-office systems to support front-line teams serve our tenants and homes more efficiently and effectively.



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Appendix



# MAKING A POSITIVE IMPACT FOR OUR TENANTS

## Damp & mould

We are committed to providing our tenants with warm, safe and affordable homes, and prioritising properties that are the least energy efficient, as well as tenants who are in fuel poverty.



As part of this vision, we are substantially increasing investment in our homes to over £300m between now and 2030. This is in addition to the £134m we have already invested over the last five years. We have also set our sights on improving the EPC rating of around 6,000 of our homes from Band D to Band C or above by 2030.

We are one of the first housing associations to establish a specialist team to deal with damp and mould. We are proactively using data and preventative measures, such as sensors, and engaging with tenants, to deliver on our objectives in the long-term.

Consistently engaging with our tenants is central to us proactively dealing with damp and mould issues. It has resulted in us developing a detailed scrutiny report and focus group action plan and conducting an Equality Impact Assessment on our damp and mould policy to make sure all tenants are being treated fairly. At the same time, we are continuously training our staff involved in managing damp and mould and maintaining a zero-tolerance approach that has been recognised as being industry-leading.



One of our tenants recently called into our Customer Hub to give us feedback on how one of our colleagues had supported her through financial hardship.

“I would like to thank you for all the support you have offered me through such a mental and stressful time. Your care, support, and guidance is something I cannot thank you enough for. Last night was the best sleep I have had in a couple of months and that’s thanks to you. Thank you again, I just want you to know that what you have done has helped me.”

## Supporting tenants in financial hardship

We help vulnerable tenants stay in their homes by offering tenant-focused support, working in collaboration local authorities and providing a financial helping hand via our Money Advice Service and Tenant Hardship Fund.

### This year, we:

- Continued to promote safeguarding and property condition as everyone’s responsibility when visiting our homes – all activity is reported on our online HomeChecker system – with c94,000 HomeChecker forms completed by colleagues in the past year.
- Identified a cohort of tenants that have experienced recurring damp and mould over several years, despite there being no structural issues with their properties. We are contacting these tenants to help them on wider scale as part of our Healthy Homes study. We also issued c£7,000 heating vouchers to tenants within our Healthy Home project.
- Maximised tenant income by £3.4m (£2.6m last year), increasing income and reducing debt liability.

- Promoted the take up of Pension Credit – £95,000 was awarded, an increase of 13% on 2023-24.
- We obtained Universal Credit awards of £536,000 and £37,500 (£245,000 and £27,000 respectively last year) in Discretionary Housing Payment for tenants struggling to meet their rent shortfall due to financial hardship and effects of welfare reform.
- Helped eligible tenants obtain an additional £1m in housing benefit, and £118,000 in attendance allowance for those over 65 to help with care needs.
- Provided additional support for our tenants who are struggling to cope with the food and energy price inflation – responding to over 100 requests for help with emergency food and over 150 requests for help with heating costs.
- Gained access to Trussell food bank portal so that we can quickly issue food vouchers electronically.
- Secured £127,000 (£92,000 last year) from charities, trust funds and tenant hardship funds to help reduce debt and purchase essential goods and services, such as ovens, bedding and fridges.

## Building safety

We continued our 100% compliance on SRSSH building safety criteria metrics across our homes:



The regulatory environment is constantly evolving with new regulatory judgments and guidance, such as 'Building a Safer Future' and the Fire Safety Act. Where possible, we adopt best practice in our properties and workplaces. We put tenant consultation at the heart of safety, ensuring that we have clear processes to raise concerns and are transparent with their resolutions.

Within the year:

- We continued our 100% compliance measure.
- We have registered our building safety cases for our 5 buildings in scope (above 18 metres) and have developed our Building Safety case files ready for submission when the Regulator invites us to do so. One has been submitted so far, and;
- We continue to submit our Regulatory Fire Safety Survey each quarter.

## Tenant satisfaction

We recorded 88.8% overall satisfaction this year remaining consistent with previous years around 89%.

The figure is based on tenant feedback from 11 core service areas including responsive repairs, gas repairs, gas servicing, income services and grounds maintenance. Feedback was received through c11k telephone interviews undertaken across a range of services and tenants over the year. We work with an independent research partner (MEL Research) who undertake telephone interviews with tenants within days of tenants receiving our services.

Performance is reported to service leads at an operational level and Executive Board on monthly basis. Service improvement plans are initiated by service leads if performance dips.

## New tenant-focused social value offers

Last year we commissioned the Housing Association Charitable Trust (HACT) to understand our social value offering. The overall aim of the project was to secure tangible social value offers that support our tenants.

Tenant-focused social value is inherent in what we do, like building new social rent homes to help remediate the national housing crisis in the Midlands region. The significant increase in investment in our new corporate plan means that we will be putting more money than ever into our homes, neighbourhoods and the regional economy.

Through an enhanced social value offering we will:

- Ensure compliance with the new Procurement Act when we tender for new large contracts. We will hold our suppliers accountable to deliver tenant-focused social value offers within their contract with us.
- Track holistic outcomes in our locality-based neighbourhood investment.
- Maximise value in our significant investment activities like key new build developments and the Homes for Modern Living programme.

According to HACT we have delivered significant value across targeted key areas of investment and tenant support services totalling £33.1m. The total includes £2.8m of social value that was indicative – using an alternative metric to calculate value to what is used in the Social Value Bank of measures.



# HANDING OVER OUR 450TH NEW HOME AT DRAKELOW

**As part of our last corporate plan, Making What Matters Brilliant, we committed to and successfully delivered 4,000 new affordable homes.**

In total we delivered 813 new energy efficient affordable homes in 2024-25.

In 2025 we handed over our 450th home at our Vistry Drakelow scheme near Burton-on-Trent.

The mostly EPC band B development will provide affordable homes to hundreds of tenants and their families. Generating a 2024-25 financial year total of £4.4m in social value for the provision of quality energy efficient affordable housing.



# SECURING VALUE THROUGH STRONG GOVERNANCE

## Securing investment in our homes and services

**The changing operating environment and increasing sector scrutiny mean that we are investing more than ever into our homes despite tightening financial circumstances.**

In 2024–25, Midland Heart generated £243.1m, mainly from rent and service charge income. Of this income:

- 178.4m was used to cover operating costs. This includes maintaining and improving our homes, as well as meeting service charge commitments.
- £27.9m was spent on financing our debt. This borrowing is essential, as it allows us to continue investing in homes for the future.
- £148.7m was invested directly into our homes. This investment was split between £113.4m for building new homes and £35.0m for improving existing homes.
- We also contributed by paying £21.8m in irrecoverable VAT and other business taxes.

Through careful financial management, we are able to balance our day-to-day responsibilities with long-term investment, ensuring that Midland Heart continues to operate sustainably.



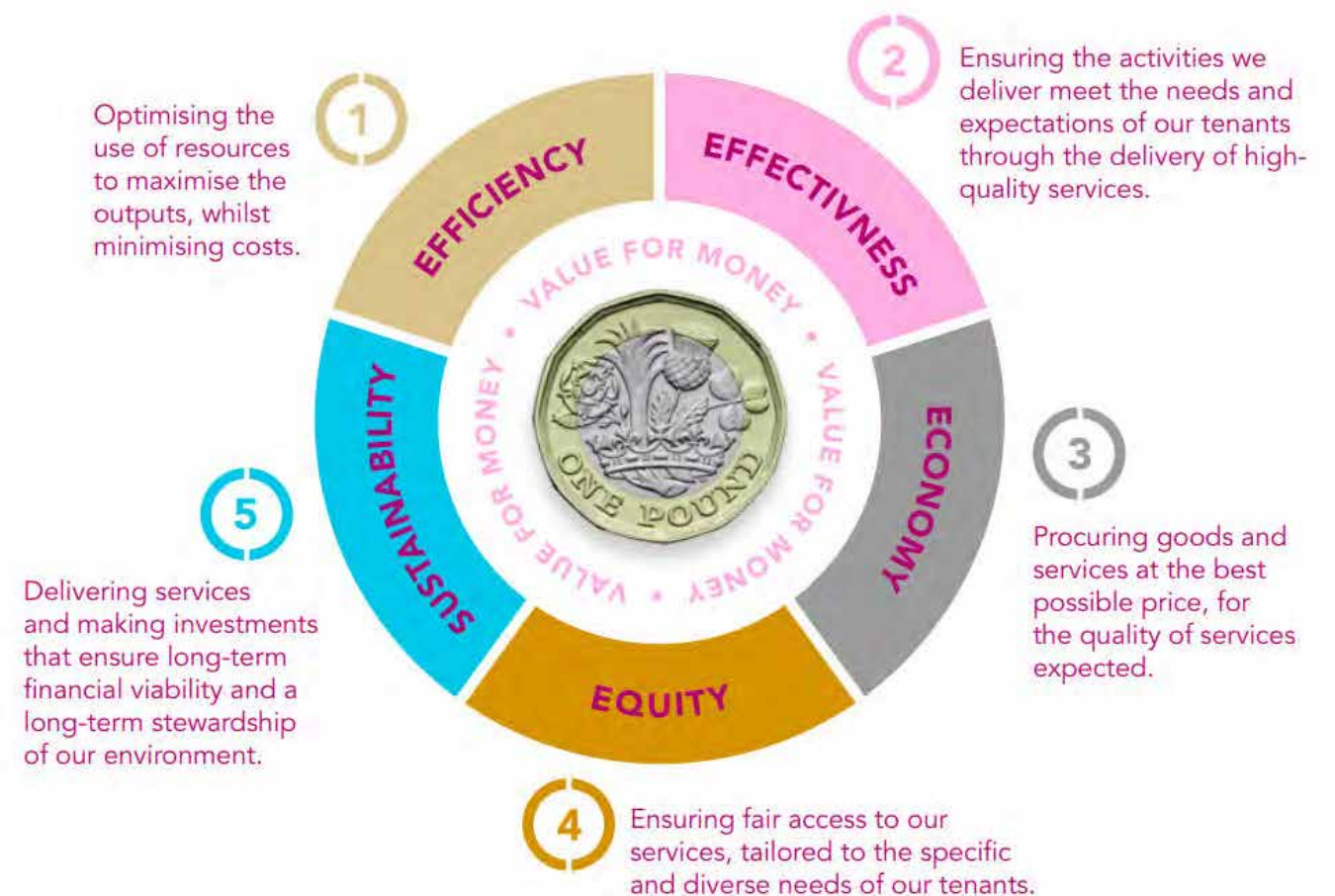
## Value for Money

Value for Money (VFM) is an integral part of ensuring that our tenants receive high quality services and well-maintained homes, optimising the impact of our resources for their benefit.

Economy, Efficiency, Equity and Sustainability are part of our fundamental principles of VFM. Core elements of sustainability will be underpinned by a strong VFM culture, information that is transparent and accessible to tenants and other stakeholders.

Our approach to VFM is embedded throughout the business both at a strategic level and an operational level across all business streams and is an integral part of our culture.

We will endeavour to provide direct benefits to tenants, whether this is through direct reductions in fuel bills, optimising their access to benefits and other services, or using our procurement strength to gain wider benefits such as access to skills and employment.



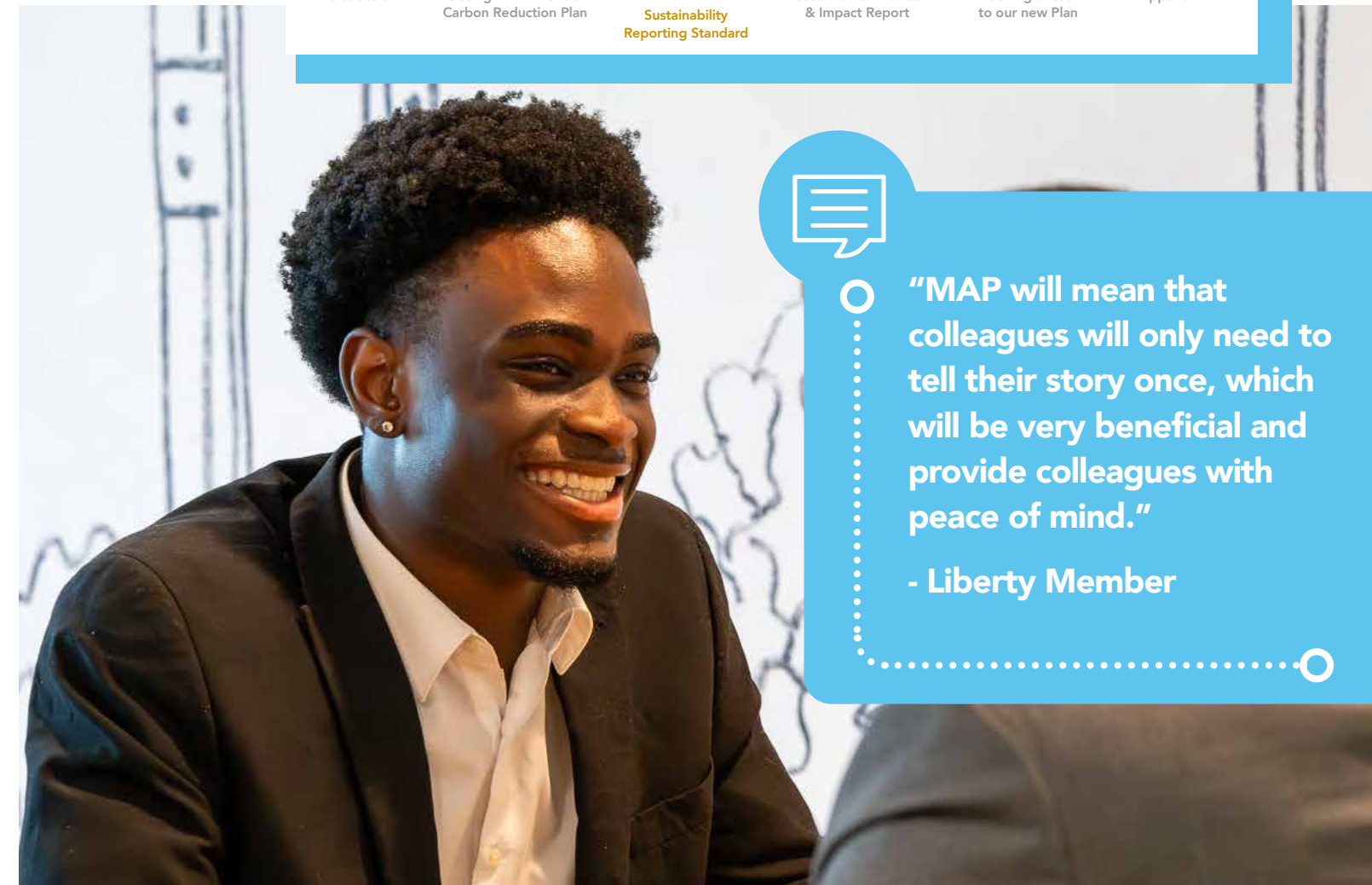
# CREATING A SENSE OF BELONGING AT WORK

Being a great place to work is central to our corporate strategy. Put simply, we want colleagues to thrive and develop their careers irrespective of background.

We work with our Colleague Champions and Inclusion Networks to make our people feel a sense of belonging and feel heard about the things that matter to them.

## Our achievements this year include:

- Our colleague engagement score remains consistently high at c80%
- We fully utilised the apprenticeship levy with 25 early careers apprentices including trade apprentices in our In House Maintenance Team across carpentry, electrical and plumbing. We also have an additional 36 colleagues undertaking apprenticeships alongside their current roles, studying subjects from coaching to surveying.
- We have introduced a second cohort of mental health first aiders, launched mental health for managers e-learning and delivered stress and resilience training to 95 colleagues and managers in areas where mental health absence has been higher. As a result, we've seen a 12% reduction in mental health related absence.
- Our work on equality, diversity and inclusion (EDI) has been recognised by the Inclusive Employers Standard where we were awarded the bronze standard on first time of entering.
- To improve gender representation in managerial and leadership roles we have delivered two cohorts of our female development programmes.
- We have delivered two cohorts of the development programme for black colleagues. 35% of participating colleagues moved into higher paid roles. Looking wider than the programme, 39% of colleagues who are currently receiving investment in their formal development are ethnically diverse. This has contributed to 46% of promotions being to colleagues from an ethnically diverse background (19% to black colleagues).
- Over the last 12 months, we've seen an increase to 12% in colleagues sharing a disability with us, which is above the national average.
- We continue to see increasing engagement with our Inclusion Networks, which continue to bring colleagues together to solve issues, engage with colleagues and celebrate success.



“MAP will mean that colleagues will only need to tell their story once, which will be very beneficial and provide colleagues with peace of mind.”  
- Liberty Member

## Disability support

Since 2019, we have seen an increase in the representation of disabled colleagues from 6% to 13%. This has been achieved through a mixture of recruiting more disabled colleagues, collaboration between our disability inclusion network and the Talent team to identify and remove barriers for disabled people during the recruitment process and more colleagues telling us they have a disability. This resulted in an increase of all data completion from 17% to 83%.

We continue to work with Liberty, our disability network, and have recently scoped out a ‘My Adjustment Pass’, which will act as a central disability record for colleagues.

The ‘My Adjustment Pass’ is designed for colleagues to capture what’s in place to help them work best and feel included. It’s designed to ensure continuity of adjustments if a colleague changes role, moves between teams or is assigned a new line manager. Since the launch in January 2025, 41 colleagues have completed a MAP. We will continue working with Liberty (our Disability Network) and managers to promote MAP and encourage usage.

# SUSTAINABLE FINANCE ALLOCATION & IMPACT REPORT

Since we published our first Sustainable Finance Framework (SFF) in 2023, we have evolved our sustainable finance facilities to align our social purpose and low carbon strategy with our funding and financial strategy.

To date we have £300m of loan facilities linked to our environmental and social performance, like our ambitious target to build high volumes of new energy efficient affordable homes. This year’s allocation & impact report continues our transparency on how we have financed a select number of eligible areas which are fundamental elements of our business model and deliver the most positive societal and environmental impacts.

An amount equivalent to the net proceeds raised under this Sustainable Finance Framework will be used to finance and/or refinance in whole or in part new or existing Eligible Projects, subject to the ICMA and LMA principles. The use of proceeds will not be used for activities that fall outside the framework’s activities and criteria.

The table summarises our material expenditure for the second allocation & impact report.

[Visit our Investors Hub](#)

| ICMA & LMA category | Indicative alignment to the UN SDGs                                | Strategic key theme | Description                                                                                     | Quantum                  | Impact (no. homes (*schemes)) |         | Total expenditure (£000s) |         | Eligible expenditure (exc. grant) (£000s) |         | Total eligible expenditure (inc. grant) (£000s) |         |
|---------------------|--------------------------------------------------------------------|---------------------|-------------------------------------------------------------------------------------------------|--------------------------|-------------------------------|---------|---------------------------|---------|-------------------------------------------|---------|-------------------------------------------------|---------|
|                     |                                                                    |                     |                                                                                                 |                          | 2023-24                       | 2024-25 | 2023-24                   | 2024-25 | 2023-24                                   | 2024-25 | 2023-24                                         | 2024-25 |
| Affordable housing  | 10. Reduced inequalities<br>11. Sustainable cities and communities | The homes we build  | The construction and acquisition of affordable housing in the United Kingdom                    | <80% private sector rent | 124                           | 143     | £17,744                   | £15,636 | £14,047                                   | £15,154 | £17,744                                         | £15,636 |
| Energy efficiency   | 11. Sustainable cities and communities<br>13. Climate action       | The homes we build  | The construction of new homes classified as EPC ‘B’ or higher in the United Kingdom             | EPC B or above           | 545                           | 668     | £122,586                  | £98,813 | £95,346                                   | £61,039 | £122,586                                        | £98,813 |
|                     |                                                                    | The homes we rent   | Retrofitting existing homes to EPC C or above by at least EPC one band from EPC D or below      | EPC band movements       | 410                           | 261     | £8,876                    | £11,477 | £4,301                                    | £2,775  | £6,128                                          | £4,260  |
|                     |                                                                    | The homes we rent   | Installation of appliances or devices to improve energy efficiency of new or existing buildings | kWh/yr savings           | 25*                           | 49*     | £793                      | £737    | £793                                      | £737    | £793                                            | £737    |

## Methodology and assurance

In 2024, we appointed Newbridge Advisors LLP to independently review our internal processes and how we track spend in accordance with eligible projects outlined in our Sustainable Finance Framework.

“On the basis of the work undertaken, nothing came to our attention to suggest that the Selected Information is not fairly stated and has not been prepared, in all material respects, in accordance with the Criteria.” Newbridge Advisors LLP

Social – Calculating affordability in the construction and acquisition of affordable housing. According to national planning policy affordable housing rent should be 20% below local market value. The calculation uses the rent figure in our handover report and compares the two. Dependent on how many properties qualify under this measure and the size of the properties, the spreadsheet apportions the cost to be split between how many properties qualify under the <80% measure and remaining costs under the EPC measure.

Green – Calculating energy efficiency in the installation of appliances or devices to improve energy efficiency of new or existing buildings. For the installation of energy efficient lighting in schemes we have used a sample of lighting surveys to calculate a pre and post installation efficiency in kWh. The calculated change in efficiency has been combined by scheme or block.

# HOMES FOR MODERN LIVING PILOT

With the highest proportion of pre-war homes of any housing association in the UK, we face a unique challenge to bring them up to today's living standards and make them fit for modern living.

These homes are some of the least energy efficient of our portfolio, and as we continue to make great progress levelling up our homes to at least EPC band C by 2030, we are now intently focused on upgrading our oldest homes to make them more comfortable to live in, and cheaper to heat.

We are confident we can make a real difference to the thermal comfort and aesthetic of these homes.

Our 'Homes for Modern Living pilot' saw c50 homes extensively refurbished, with new kitchens and bathrooms fitted, walls decorated, and triple glazing installed to reduce heat loss and keep energy bills low.

Over the course of our new corporate plan, Tenants at Heart, we plan to make a record £300million investment in our oldest homes, a quarter of which will be retrofitted to improve their energy efficiency, and the rest will receive a variety of home upgrades, including new kitchens and bathrooms.



"Moving into my new home was amazing. Just being able to walk into the bathroom and kitchen and see that the flooring is complete, and everything is brand new was just amazing. As a mum, I need space, and everything is a good size with a big garden for my little girl to run around in. It's perfect for our first home."

Midland Heart tenant

# SUSTAINABILITY WITHIN TENANTS AT HEART



From listening to our tenants, colleagues and stakeholders, we know that investing in existing homes is paramount. Improving energy efficiency and more simplified, visible and responsive service standards are clear priorities, whilst ensuring we remain a financially secure landlord.

Our new corporate plan to 2030 is ambitious. We want to deliver the very best outcomes for our tenants, our colleagues and our stakeholders and this is aligned to our core charitable and social aims.

This means we need to continue to make sustainable investments in new and existing homes, tackle diverse needs, have a greater local impact, do things right first time, be more responsive, enhance our digital offering, and deliver new ways of working through empowering colleagues.

We will make record investments of c£300m in our existing homes and a gross c£500m in the building of new energy efficient, affordable homes. We remain committed to our pathway to net zero by 2050, evidenced through our SHIFT Gold award and in the publishing of a new 'Our Carbon Reduction Plan' to 2030. We are committed to reducing our operational CO2 from 'the way we work' in alignment with Paris Agreement goals to reduce the increase in the global average temperature to well below 2°C (WB2C) above pre-industrial levels.

## OUR VISION

Our whole focus is to put the tenant at the heart of all we do. To further sharpen our purpose, our new vision is to: **Provide quality, affordable homes across the Midlands.**

## Our Targets



### Homes that enable modern living

Improving the quality of existing homes is the cornerstone of this new corporate plan and the most important priority for our tenants. We know the quality and responsiveness of our day-to-day repairs service goes to the heart of tenant satisfaction. At the most basic level, this is about providing decent, safe and affordable homes. We will be doing much to tackle our aging stock, bringing together our plans for component replacements, retrofit and meeting tenant expectations to enable modern living.



### Quality services and local impact

We will remain focused on providing high quality and tenant-centric services, while strengthening our approach to local neighbourhood management by having greater frontline presence and impact in the local areas where we work. We will work with tenants, partners and statutory agencies to invest in local areas and work collaboratively to tackle tenant priorities.



### Financial resilience and sustainable growth

We are acutely aware of the national shortage of new homes. We want to continue to improve the overall quality of our homes through the provision of new social, affordable and shared ownership units.

To deliver the levels of investment needed we need to ensure that our plan is costed and we have the financial capacity that meets our golden rules and provides sufficient headroom.



### One team working together for our tenants

To deliver this corporate plan we will embed a tenant-centric culture with empathy, honesty, reliability and professional curiosity being key to delivering the best homes and services for tenants.

# DELIVERING IN YEAR ONE

The first year of our new Plan is the most important for Sustainability delivery. Year One will see extensive investment to facilitate immediate delivery towards our targets, including; localities resources, new build schemes and scaling up our Homes for Modern Living pilot.

## Our Targets

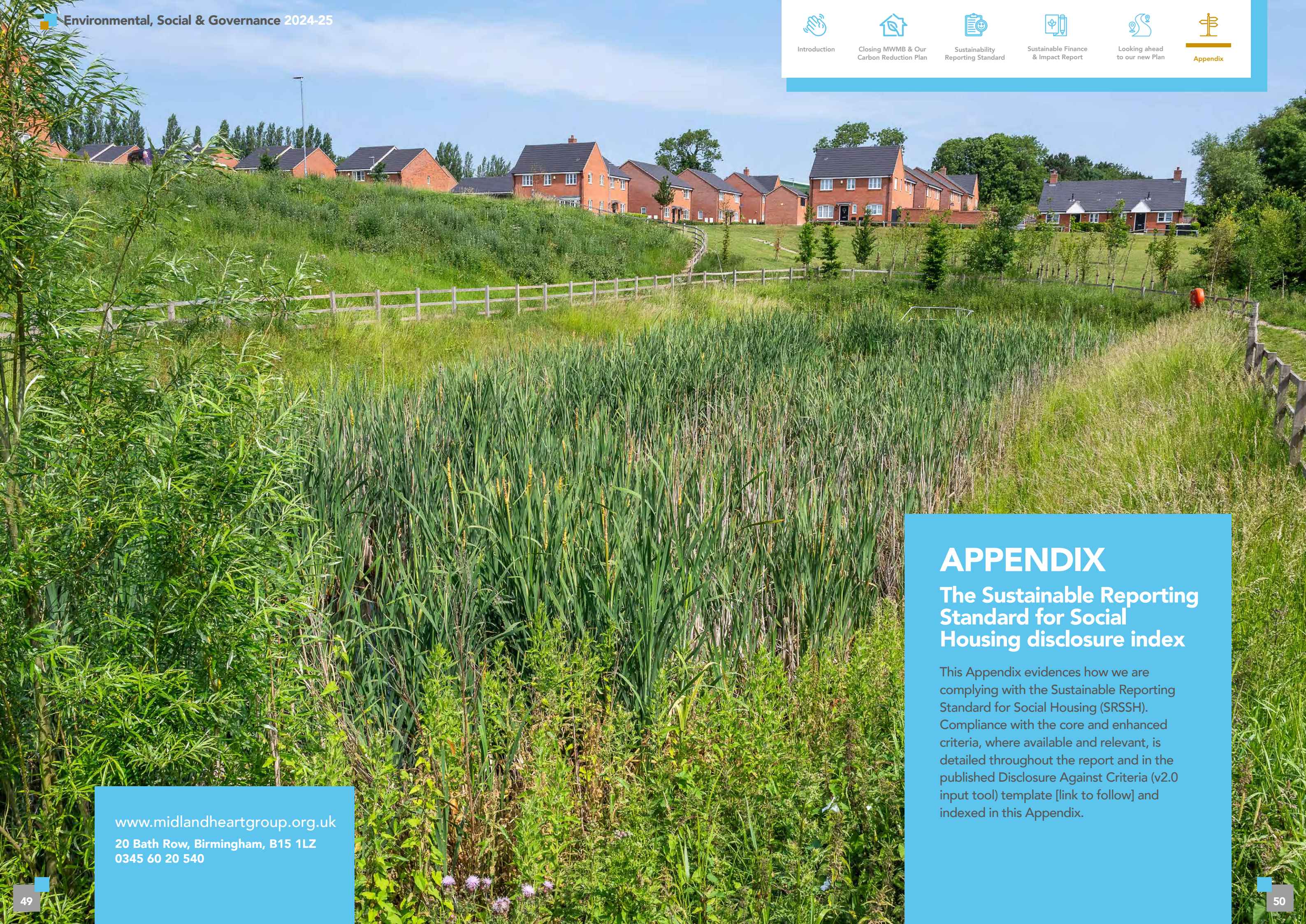
- 
**Quality services and local impact**  
 Deliver two locality-based neighbourhood investment schemes to drive tenant-focused outcomes including tackling fly-tipping and managing waste provisions.
- 
**Homes that enable modern living**  
 Upgrade c300 homes to enable Modern Living including achieving EPC C as a minimum standard of energy efficiency and thermal comfort.  
  
 Achieve 83% EPC C or above across all of our homes that require an EPC. Keeping us on track to EPC C by 2030 and a science-aligned pathway to net zero by 2050.
- 
**Financial resilience and sustainable growth**  
 Achieve a 200 tonnes reduction in CO2 emissions across our Scope 1 & 2 purchased energy and fleet operations.  
  
 Receive the first tranche of electric vans in our fleet and place an order for further vans to arrive in 2026.  
  
 Secure new affordable energy contracts for our communal energy supplies to tenants and offices.  
  
 Build c350 new energy affordable homes as part of our commitment to build 2,250 new homes by 2030.
- 
**One team working together for our tenants**  
 Develop our early careers offering with new apprenticeship placements offered to young persons in the West Midlands.  
  
 Provide a step change in improving our ability to record and access information through a new electronic document and records management system (EDRMS).



## Publishing 'Our Carbon Reduction Plan'

We will publish the new version of 'Our Carbon Reduction Plan' to run underneath Tenants at Heart between 2025 and 2030. The new tenant-centric plan will work as a catalyst to support the delivery of sustainability and social value within Tenants at Heart. The plan will ensure that:

- Tenants are prioritised. The Plan will focus on what is material to our tenants, as the key stakeholder by listening to their voice.
- We maintain alignment with science and key standards to deliver wide-reaching sustainability commitments and tangible outcomes.
- Responsibilities are clearly defined so everyone in Midland Heart knows their role in delivering tenant-centric sustainability change.
- We are realistic about the pace of change. The transition to net zero must be fair and inclusive, ensuring that the benefits and burdens are shared equitably across society.



# APPENDIX

## The Sustainable Reporting Standard for Social Housing disclosure index

This Appendix evidences how we are complying with the Sustainable Reporting Standard for Social Housing (SRSSH). Compliance with the core and enhanced criteria, where available and relevant, is detailed throughout the report and in the published Disclosure Against Criteria (v2.0 input tool) template [link to follow] and indexed in this Appendix.

[www.midlandheartgroup.org.uk](http://www.midlandheartgroup.org.uk)  
20 Bath Row, Birmingham, B15 1LZ  
0345 60 20 540

# APPENDIX

## Environmental

|    |          |                                                                                                                                                                                                                                                           |                                                 |                    |
|----|----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------|--------------------|
| C1 | Core     | Distribution of EPC ratings of the housing provider's existing homes (those completed before the last financial year).                                                                                                                                    | Page 21                                         |                    |
|    | Enhanced | Average SAP rating of existing homes.                                                                                                                                                                                                                     | 73.2                                            |                    |
|    |          | Energy use intensity of existing homes.                                                                                                                                                                                                                   | 230 kWh/m2/yr                                   |                    |
| C2 | Core     | Distribution of EPC ratings of the housing provider's new homes (those completed in the last financial year).                                                                                                                                             | Page 22                                         |                    |
|    | Enhanced | Average SAP rating of new homes.                                                                                                                                                                                                                          | 85.8                                            |                    |
| C3 | Core     | Does the housing provider have a Net Zero target and strategy? If so, what is it and when does the housing provider intend to be net zero by?                                                                                                             | Yes                                             |                    |
|    |          |                                                                                                                                                                                                                                                           | Qualitative response                            | Page 19<br>Page 45 |
|    | Enhanced | Is the housing provider's net zero commitment in line with the Science Based Target (SBT) initiative?                                                                                                                                                     | Yes                                             |                    |
|    |          | Does the housing provider have a costed net zero transition plan?                                                                                                                                                                                         | Partial - The plan is based on property assets. |                    |
| C4 | Core     | What retrofit activities has the housing provider undertaken in the last 12 months in relation to its housing stock? How do these activities align with, and contribute towards, performance against the housing provider's Net Zero strategy and target? | Page 21                                         |                    |
|    |          |                                                                                                                                                                                                                                                           | See Disclosure Against Criteria                 |                    |
|    | Enhanced | Number of homes that have been retrofitted in the last financial year.                                                                                                                                                                                    | # of homes                                      | 1,575              |
|    |          | Homes that have been retrofitted in the last financial year as a percentage of the total homes the housing providers is aiming to retrofit.                                                                                                               | % of homes                                      | 24%                |
| C5 | Core     | Scope 1, Scope 2 and Scope 3 Green House Gas emissions                                                                                                                                                                                                    | 103,963 tonnes CO2e                             |                    |
|    |          | Scope 1, Scope 2 and Scope 3 Green House Gas emissions per home                                                                                                                                                                                           | 3,021 kg CO2e/ home                             |                    |
|    | Enhanced | Does the housing provider qualify for SECR reporting?                                                                                                                                                                                                     | Yes                                             |                    |
|    |          | SECR Intensity Ratio as reported in the Financial Statements                                                                                                                                                                                              | kgCO2e/ #homes                                  | 222.8              |

|     |          |                                                                                                                                                                                                                |                                 |         |
|-----|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|---------|
| C6  | Core     | How has the housing provider mapped and assessed the climate risks to its homes and supply chain, such as increased flood, drought and overheating risks? How is the housing provider mitigating these risks?  | Page 25                         |         |
| C7  | Core     | Does the housing provider have a strategy to enhance green space and promote biodiversity on or near homes?                                                                                                    | Page 26                         |         |
|     | Enhanced | Biodiversity Net Gain (BNG) of new homes (those completed in the last financial year).                                                                                                                         | %                               | NA      |
|     |          | What is the housing provider's BNG target (for new and existing homes)?                                                                                                                                        | % for existing homes            | NA      |
|     |          |                                                                                                                                                                                                                | % for new homes                 | 10%     |
|     |          | Does the housing provider's BNG target exceed minimum requirements?                                                                                                                                            | No                              |         |
|     |          |                                                                                                                                                                                                                | Page 26                         |         |
| C8  | Core     | Does the housing provider have a strategy to identify, manage and reduce pollutants that could cause material harm? If so, how does the housing provider target and measure performance?                       | Yes                             |         |
|     |          |                                                                                                                                                                                                                | Qualitative response            | Page 28 |
| C9  | Core     | Does the housing provider have a strategy to use or increase the use of responsibly sourced materials for all building and repairs works? If so, how does the housing provider target and measure performance? | No, but planning to develop one |         |
|     |          |                                                                                                                                                                                                                | Qualitative response            | Page 28 |
| C10 | Core     | Does the housing provider have a strategy for waste management incorporating building materials? If so, how does the housing provider target and measure performance?                                          | Yes                             |         |
|     |          |                                                                                                                                                                                                                | Qualitative response            | Page 27 |
|     | Enhanced | % of materials that are recycled and/or diverted from landfill                                                                                                                                                 | 92%                             |         |
| C11 | Core     | Does the housing provider have a strategy for water management? If so, how does the housing provider target and measure performance?                                                                           | No                              |         |
|     |          |                                                                                                                                                                                                                | Qualitative response            | Page 28 |



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## Social

|     |      |                                                                                                                 |                                        |         |
|-----|------|-----------------------------------------------------------------------------------------------------------------|----------------------------------------|---------|
| C12 | Core | For properties that are subject to the rent regulation regime, report against one or more Affordability Metric. | % of PRS rent                          | 60%     |
|     |      |                                                                                                                 | % of LHA rent                          | 71%     |
| C13 | Core | Number, and share, of existing homes (owned and/or managed and completed before the last financial year).       | # of General Needs (social rent) units | 20,895  |
|     |      |                                                                                                                 | # of Intermediate Rent units           | 27      |
|     |      |                                                                                                                 | # of Affordable Rent units             | 4,887   |
|     |      |                                                                                                                 | # of Supported Housing units           | 750     |
|     |      |                                                                                                                 | # of Housing for Older People units    | 1,414   |
|     |      |                                                                                                                 | # of Low-cost Home Ownership units     | 2,484   |
|     |      |                                                                                                                 | # of Care Home units                   | 26      |
|     |      |                                                                                                                 | # of Private Rented Sector units       |         |
|     |      |                                                                                                                 | # of Other units                       | 3,949   |
| C14 | Core | Number, and share, of new homes (owned and/or managed, and completed in the last financial year).               | # of General Needs (social rent) units | 57      |
|     |      |                                                                                                                 | # of Intermediate Rent units           |         |
|     |      |                                                                                                                 | # of Affordable Rent units             | 543     |
|     |      |                                                                                                                 | # of Supported Housing units           |         |
|     |      |                                                                                                                 | # of Housing for Older People units    |         |
|     |      |                                                                                                                 | # of Low-cost Home Ownership units     | 213     |
|     |      |                                                                                                                 | # of Care Home units                   |         |
|     |      |                                                                                                                 | # of Private Rented Sector units       |         |
| C15 | Core | How is the housing provider trying to reduce the effect of high energy costs on its residents?                  |                                        | Page 21 |
|     |      |                                                                                                                 |                                        |         |

|     |          |                                                                                                                                                                                                                          |                                                                                                                                                               |                                 |
|-----|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|
| C16 | Core     | How does the housing provider provide security of tenure for its residents?                                                                                                                                              | Our tenure security policy is to stop fixed term tenancies for three beds and smaller, removing them as a tenancy option whilst renewing tenancies this year. |                                 |
| C17 | Core     | Describe the condition of the housing provider's portfolio, with reference to:                                                                                                                                           | 100% of homes (with gas safety checks)                                                                                                                        |                                 |
|     |          |                                                                                                                                                                                                                          | 100% of homes (with fire risk assessments)                                                                                                                    |                                 |
|     |          |                                                                                                                                                                                                                          | 100% of homes (with electrical safety checks)                                                                                                                 |                                 |
|     | Enhanced | 100% of homes (with asbestos checks)                                                                                                                                                                                     |                                                                                                                                                               |                                 |
|     |          | 100% of homes (with legionella assessments)                                                                                                                                                                              |                                                                                                                                                               |                                 |
|     |          |                                                                                                                                                                                                                          | 100% of homes (with lift safety checks)                                                                                                                       |                                 |
| C18 | Core     | What % of the housing provider's homes meet the national housing quality standard? Of those which fail, what is the housing provider doing to address these failings?                                                    | 99.99% homes                                                                                                                                                  |                                 |
|     | Enhanced | What is the target date for bringing homes that do not meet the standard into compliance?                                                                                                                                | See Disclosure Against Criteria                                                                                                                               |                                 |
| C19 | Core     | How does the housing provider manage and mitigate the risk of damp and mould for its residents?                                                                                                                          | Page 30                                                                                                                                                       |                                 |
| C20 | Core     | What are the results of the housing provider's most recent tenant satisfaction survey? How has the housing provider acted on these results?                                                                              | % of residents satisfied                                                                                                                                      | 88.8%                           |
|     |          |                                                                                                                                                                                                                          | Qualitative response                                                                                                                                          | Page 34                         |
| C21 | Core     | What arrangements are in place to enable residents to hold management to account for the provision of services?                                                                                                          | Page 10                                                                                                                                                       |                                 |
| C22 | Core     | In the last 12 months, in how many complaints has the national Ombudsman determined that maladministration took place? How have these complaints (or others) resulted in change of practice within the housing provider? | # complaints upheld                                                                                                                                           | 44                              |
|     |          |                                                                                                                                                                                                                          | Qualitative response                                                                                                                                          | See Disclosure Against Criteria |
| C23 | Core     | What are the key support services that the housing provider offers to its residents? How successful are these services in improving outcomes?                                                                            | Page 31                                                                                                                                                       |                                 |
| C24 | Core     | Describe the housing provider's community investment activities, and how the housing provider is contributing to positive neighbourhood outcomes for the communities in which its homes are located.                     | Page 43                                                                                                                                                       |                                 |
|     |          |                                                                                                                                                                                                                          | Page 46                                                                                                                                                       |                                 |



## Governance

|            |          |                                                                                                                                                                                                                                    |                                                      |  |
|------------|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|--|
| <b>C25</b> | Core     | Is the housing provider registered with the national regulator of social housing?                                                                                                                                                  | Yes                                                  |  |
| <b>C26</b> | Core     | What is the housing provider's most recent regulatory grading/status?                                                                                                                                                              | G1 V1 C1 status from the Regulator of Social Housing |  |
| <b>C27</b> | Core     | Which Code of Governance does the housing provider follow, if any?                                                                                                                                                                 | UK Corporate Code of Governance                      |  |
| <b>C28</b> | Core     | Is the housing provider a Not-For-Profit?                                                                                                                                                                                          | Yes                                                  |  |
| <b>C29</b> | Core     | Explain how the housing provider's board manages ESG risks.                                                                                                                                                                        | Page 25                                              |  |
|            |          | Are ESG risks incorporated into the housing provider's risk register?                                                                                                                                                              | Yes                                                  |  |
|            | Enhanced | Is the housing provider required to report against TCFD?                                                                                                                                                                           | No                                                   |  |
| <b>C30</b> | Core     | Has the housing provider been subject to any adverse regulatory findings in the last 12 months (data protection breaches, bribery, money laundering, HSE breaches etc.) - that resulted in enforcement or other equivalent action? | No                                                   |  |
| <b>C31</b> | Core     | How does the housing provider ensure it gets input from a diverse range of people into its governance processes?                                                                                                                   | Page 10<br>See Disclosure Against Criteria           |  |
|            |          | % of board that are women                                                                                                                                                                                                          | 40%                                                  |  |
|            |          | % of board that are BAME                                                                                                                                                                                                           | 30%                                                  |  |
|            |          | % of board that are residents                                                                                                                                                                                                      | 0%                                                   |  |
|            |          | % of board that have a disability                                                                                                                                                                                                  | 10%                                                  |  |
|            |          | Average age of board members (years)                                                                                                                                                                                               | 54                                                   |  |
|            |          | Average board tenure (years)                                                                                                                                                                                                       | 7.3                                                  |  |
| <b>C32</b> | Core     | What % of the housing provider's Senior Management Team (includes Board) have turned over in the last two years?                                                                                                                   | 30%                                                  |  |

|                      |          |                                                                                                                          |                                                                                                                                                                                                                                              |                                               |
|----------------------|----------|--------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------|
| <b>C33</b>           | Core     | Number of Board members on the housing provider's Audit Committee with recent and relevant financial experience.         | 2                                                                                                                                                                                                                                            | These Board members are Chartered Accountants |
| <b>C34</b>           | Core     | What % of the housing provider's board are non-executive directors?                                                      | % of board                                                                                                                                                                                                                                   | 60%                                           |
| <b>C35</b>           | Core     | Has a succession plan been provided to the housing provider's board in the last 12 months?                               | Yes/No                                                                                                                                                                                                                                       | Yes                                           |
| <b>C36</b>           | Core     | For how many years has the housing provider's current external audit partner been responsible for auditing the accounts? | # of whole years                                                                                                                                                                                                                             | 18                                            |
| <b>C37</b>           | Core     | When was the housing provider's last independently-run board-effectiveness review?                                       | Date                                                                                                                                                                                                                                         | Jun-25                                        |
| <b>C38</b>           | Core     | How does the housing provider handle conflicts of interest at the Board?                                                 | Conflicts of interest are handled in accordance with the Board Code of Conduct. Annual Declaration of Interest at the start of each financial year following by a standing item at the start of each meeting for any declaration to be made. |                                               |
| <b>C39</b>           | Core     | Does the housing provider pay the Real Living Wage?                                                                      | Yes                                                                                                                                                                                                                                          |                                               |
| <b>C40</b>           | Core     | What is the housing provider's median gender pay gap?                                                                    | 10.02%                                                                                                                                                                                                                                       |                                               |
| <b>C41</b>           | Core     | What is the housing provider's CEO: median-worker pay ratio?                                                             | 10.96:1                                                                                                                                                                                                                                      |                                               |
| <b>C42</b>           | Core     | How is the housing provider ensuring equality, diversity and inclusion (EDI) is promoted across its staff?               | Page 39                                                                                                                                                                                                                                      |                                               |
| <b>C43</b>           | Core     | How does the housing provider support the physical and mental health of its staff?                                       | Page 39                                                                                                                                                                                                                                      |                                               |
| <b>C44</b>           | Core     | How does the housing provider support the professional development of its staff?                                         | Page 39                                                                                                                                                                                                                                      |                                               |
|                      | Enhanced | What % of employees have received qualification(s) that are relevant for their professional development?                 | c10%                                                                                                                                                                                                                                         |                                               |
| <b>C45 &amp; C46</b> | Core     | How is social value creation and the environment considered when the housing provider is procuring goods and services?   | See Disclosure Against Criteria                                                                                                                                                                                                              |                                               |
|                      | Enhanced | What is the relative weighting of Social Value considerations in procurement policies?                                   | 5%                                                                                                                                                                                                                                           |                                               |
|                      | Enhanced | What is the relative weighting of environmental impact considerations in procurement policies?                           | 5%                                                                                                                                                                                                                                           |                                               |