



Equality, Diversity and Inclusion (EDI) Policy

Introduction

At the Springfield Group we are proud to create a culture where everyone can thrive. We are committed to encouraging equality, diversity and inclusion amongst our workforce and eliminating discrimination. We are equally keen for our governance structure to allow for the best representation of households across Scotland within our Board of Directors.

We want to recruit the best people for all positions within Springfield. We also understand the importance of our workforce and our Board being representative of all sections of the society that we work in and for each employee to feel respected and able to give their best. This policy outlines how we achieve that.

Aims and Structure of EDI policy

By bringing together all appropriate references to equality, diversity and inclusion into one place, we believe that this policy will provide a useful tool to assist employees throughout our business to ensure best practice is being upheld. We also believe that this policy gives confidence to a wide audience – including employees, sub-contractors, customers, investors and potential recruits to name a few – around Springfield’s commitments in this important area.

As well as offering some introductory context on Springfield and Scotland (as the country we operate in), this policy outlines characteristics considered, the different forms of discrimination, our responsibilities as an employer, as well as what we expect from our employees, discipline and grievances and, finally, data. Whilst the paper is predominantly focused on employment, we have included a specific section on our aims relating to the equality, diversity and inclusion within our Board of Directors. The paper concludes with our commitment to regularly reviewing the policy content to ensure it is fit for purpose and keeping up with latest regulatory changes and best practice across society.

The content of this policy will be published within our staff handbook and, to keep it fresh in people’s minds, we will add a related article to our staff intranet quarterly. This EDI policy will also be made available as a standalone document on our corporate and career webpages.

Understanding Springfield

The Springfield Group is Scotland’s only listed housebuilder on the AIM market. We are a housebuilder delivering high quality, energy efficient homes in sustainable communities across the country. Our business involves buying land for developing, gaining planning consents and building private, affordable homes and private rented homes. All our active and past sites are in Scotland, from the Highlands to the Scottish Borders and from the west of Scotland to the east. We have offices in Elgin, Inverness, Larbert and Glasgow; timber kit factories in Elgin and in Bellshill; and we have sales offices and construction sites in regions across the country.



Understanding Scotland

We recognise the benefits of a workforce and Board of Directors that reflect the demographics of households in Scotland. Whilst Scotland shares some characteristics with the rest of the UK in terms of the make-up of its household population, a key difference is in the proportion of ethnic minority groups within Scotland. The 2011 census found that Scotland's population was 96.0% white, with the population in Asian, African, Caribbean or Black, Mixed or Other ethnic groups having doubled since 2001 to 4%. This data compares to the census in England and Wales which found that 14% of the population was made up of people from ethnic groups.

The contrast becomes more stark the further north in Scotland we travel, just as the proportion of the population from ethnic groups increase the closer to London you travel. For example, in Elgin where Springfield was founded and the location of one of our main offices as well as a timber kit factory, the population of ethnic groups reduces to 1.6%, contrasting greatly to the proportion in London, where a number of AIM listed companies are headquartered, at 40.2%.

This background information demonstrates that the pool of recruits from candidates from an ethnic group, whether it be for employment or for Board memberships, is materially smaller in Scotland. Plus the task to ensure representativeness of the households across Scotland is different than it is elsewhere in the UK.

As in England and Wales, there are a number of pockets within Scotland where the proportion of the population from ethnic groups is higher, in particular within cities. In Glasgow, 17.3% of the population identified as an ethnic minority and within Dundee, 10.6% of the population identified as an ethnic minority. Where we are building in areas with a higher representation of ethnic groups we will maximise our engagement with local schools to promote career opportunities.

With previous census showing an upward trend in ethnicity groups within the population, we look forward to reviewing this data again when the 2022 census results are published.

Equal opportunities

We are committed to valuing and promoting diversity in all areas of recruitment, employment, training, and promotion. We recognise our legal obligations under the Equality Act 2010 and work towards an environment where all employees can develop their potential, regardless of:

Age	Race
Disability	Religion
Gender reassignment	Sex
Marriage and civil partnership	Sexual orientation
Pregnancy and maternity	



No one should receive less favourable treatment or be disadvantaged on any of the above grounds. Employment decisions are based solely on objective and job-related criteria. Failure to comply with this policy or evidence of discrimination, harassment or victimisation by anyone towards a colleague, client, customer, or visitor may result in disciplinary action being taken, which may lead to dismissal.

Part-time and fixed-term employees are treated the same as comparable full-time or permanent employees and enjoy no less favourable terms and conditions (on a pro-rata basis where appropriate) unless different treatment is justified.

Forms of discrimination

<p><i>Direct discrimination</i></p> <p>When a person treats another person less favourably on any grounds.</p>	<p><i>Victimisation</i></p> <p>Retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment.</p>
<p><i>Harassment and bullying</i></p> <p>This involves unwanted behaviour which causes offence or makes a person feel uncomfortable and is a form of discrimination. Harassment is dealt with further in our Anti-bullying and Harassment policy.</p>	<p><i>Indirect discrimination</i></p> <p>This happens when an unjustifiable rule, requirement or condition is applied. Whilst it applies to all people, it disproportionately (intentionally or unintentionally) disqualifies one group of people more than another.</p>
<p><i>Disability discrimination</i></p> <p>Includes direct and indirect discrimination. Any unjustified less-favourable treatment because of a disability and/or failure to make reasonable adjustments to alleviate disadvantages caused by a disability.</p> <p>If you are disabled or become disabled, we encourage you to tell us about your condition so that we can consider what reasonable adjustments or support may be appropriate.</p>	

Our responsibilities

Throughout Springfield we are responsible for complying with this policy and eliminating any discriminatory practices which could affect the service provided to our customers, the performance of the company or the development of our employees. We are committed to managing diversity and will monitor the application of this policy.

All managers must set an appropriate standard of behaviour, lead by example and ensure that those they manage adhere to the policy and promote our aims and objectives with regard to equality, diversity and inclusion.

As part of our commitment to creating an inclusive environment for all future and current employees, we continue to offer training for our HR and management teams. This includes training courses such as Unconscious Bias, Inclusive Recruitment and Equality, Diversity and Inclusion.



Employee responsibilities

This policy lays out information on equality, diversity and inclusion that we require each of our employees to be aware of. This content of this policy is included in our employee handbook and issued to all employees as part of the induction process. It will be signposted to regularly on our staff intranet to remind employees of its importance.

Employees are responsible for complying with this policy and should be aware of the different forms of discrimination that can take place and effect these can have on others. Employees should be sensitive to the impact their own behaviour could have on others and work with line managers to eliminate any discriminatory practices which are or may be identified.

Recruitment and selection

Recruitment, promotion and other selection exercises will be conducted on the basis of merit, against objective criteria that avoid discrimination. Shortlisting and interviewing will be done by more than one person and with the involvement of the Human Resources Department, where possible.

We take steps to ensure that our vacancies are advertised to a diverse labour market where possible and any job advertising will take into consideration the use of words that may discourage particular groups from applying. We are also committed to continuing our training for recruitment and selection in areas such as unconscious bias.

Training and career development

Line managers will ensure that training, career development/promotional opportunities and further education programmes are open to all employees. An employee's strengths should be regularly identified through performance reviews and records of these will be maintained.

Objective feedback will be provided to unsuccessful internal candidates, who have applied for promotion or an alternative role.

Conditions of employment, facilities and services

Line managers review the salaries and performance reviews of employees undertaking similar jobs, to ensure consistency.

We have a legal obligation to make reasonable and practicable adjustments to retain employees with disabilities. Any employee who is affected by disability is encouraged to discuss the matter with their line manager.



Discipline, grievance and complaints

If employees feel they have been discriminated against at any time by a colleague, customer, client, or visitor, they should report this to their line manager. Equally, they should raise any potentially discriminatory behaviour made by another person to a third party during their employment, with their line manager. If however the grievance relates to an employee's line manager, contact should be made with a member of the HR team who will discuss the matter with the employee. We aim to resolve such complaints informally or formally via our grievance procedure.

If anyone external to our business, including customers, members of the community, sub-contractors or suppliers, wish to raise a complaint regarding discrimination an email should be sent to support@thespringfieldgroup.co.uk.

Anyone who is found to have breached the above policy may be subject to disciplinary action which may result in dismissal from employment.

Data

At present we do not collect any data on the equality characteristics of our employees. This is a conscious decision as we treat everyone the same and wish to be clear that none of the characteristics will influence recruitment selection or progression at Springfield. We will review this position on data as part of our wider review of our EDI policy regularly to ensure we are considering any merits of data collection in further supporting equality, diversity and inclusion within our Group.

Board of Directors

The principles set out in this policy apply to our Board of Directors as well as our employed workforce. However, as a listed company, we felt it was important to include a specific section of our EDI policy on Board representation.

At Springfield we have a Board of Directors of seven: Our Chairman, two Executive Directors and four Non-Executive Directors.

We believe that greater diversity in the boardroom leads to better decisions and improved performance, by encouraging new and innovative thinking. With women representing over half the population of Scotland we are keen to improve the gender balance of our board. Currently we have one female, which within our small Board equates to 14%.

As outlined earlier in this policy, with Springfield operating solely in Scotland, the challenge that we have in aligning our Board with our customer base is different than elsewhere in the UK with a much lower population from ethnic groups. However, we will continue to monitor changing demographics and ensure our Board recruitment processes consider this.

Of course, we want to have the very best people to sit on our Board and are determined that appointments will continue to be made on merit. To achieve this balance, our Nominations



Committee will consult with a professional company to support the recruitment for future Board vacancies to broaden the pool of potential candidates out with our existing networks and attract diverse and talented people.

Review of EDI policy

We will review employment practices and procedures when necessary to ensure fairness and to take account of changes in the law.

With the first publication of an EDI policy in 2022, a commitment is made to reviewing content in line with good practice regularly and we will proactively engage with professional networks and relevant organisations across Scotland to understand what more could be done in this area.

In addition to undertaking ongoing reviews, a formal review of our EDI policy will be undertaken every three years.