

# 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 work to 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, 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. 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 employee handbook which is accessible through our employee intranet. This EDI policy will also be made available as a standalone document on our corporate and career webpages.

### The Springfield Group

The Springfield Group is Scotland's only listed housebuilder. 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 and affordable homes. All our active and past sites are in Scotland. 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.



### **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 will 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

Direct discrimination	Victimisation
When a person treats another person less favourably on any grounds.	Retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment.
Harassment and bullying	Indirect discrimination
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.	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.

Disability discrimination

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.

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.



## 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. We also recently invested in training for a number of employees on Gender Identity and Menopause.

#### Employee responsibilities

This policy lays out information on equality, diversity and inclusion that we require each of our employees to be aware of. The content of this policy is included in our employee handbook and issued to all employees as part of the induction process. Our EDI policy is also available on our website for anyone to view.

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 <a href="mailto:support@thespringfieldgroup.co.uk">support@thespringfieldgroup.co.uk</a>.

Anyone who is found to have breached the above policy will 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.



## **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. We will also proactively engage with professional networks and relevant organisations across Scotland to understand what more could be done in this area.

Our first publication of an EDI policy was in 2022 and a full review was undertaken in 2025. We will continue to review content in line with good practice and we will continue to undertake formal reviews every three years.