

Our Environmental, Social and Governance Policy

SPRINGFIELD DELIVERS A RANGE OF SERVICES TO OFFER A GENUINE CARE PATHWAY, PROMOTING INDEPENDENCE AND DIGNITY TO RESIDENTS IN THEIR OWN HOMES AND WITHIN OUR CARE HOMES. WE REMAIN COMMITTED TO OUR CORE VALUES - BEING KIND, COMPASSIONATE AND CARING IN EVERYTHING WE DO, AND ENSURING OUR RESIDENTS, OUR PEOPLE AND OUR WIDER COMMUNITIES ARE AT THE HEART OF EVERY DECISION.

ABOUT THIS POLICY

Our ESG policy seeks to ensure, so far as it is applicable and reasonably practicable, that our operations will be carried out with a commitment to:

1. protect and enhance the environment by minimising negative impact and maximising positive impact on the environment;
2. ensure appropriate conduct towards, positive impact on and good relationships with our people, residents, suppliers and the community in which we operate; and
3. conduct our business with integrity and high standards of business ethics.

SCOPE

Our policy applies to all aspects of our business and to our people, including contractors and temporary workers across all sites and locations.

We expect our suppliers and partners to respect and adhere to this policy as part of our Purchase Terms and Conditions and our approach to supplier due diligence.

OUR ENVIRONMENTAL CONDUCT

We are committed to reducing the environmental impact of our operations and supporting the transition to a low carbon future by running our care homes sustainably.

We will:

- Comply with all local and national environment laws and regulation.
- Undertake to engage with third parties to understand and reduce the impact of our operations on the environment.
- Integrate environmental considerations into all our planning, processes and decisions.



- Give due consideration to environmental issues and energy performance in the acquisition or refurbishment of existing buildings, and the design and location of new buildings.
- Strive for continuous improvement of the environmental performance of our existing buildings.
- Provide training for all employees as appropriate to enable them to carry out their job functions in a manner that shows care for the environment.
- Involve customers, suppliers and subcontractors in the implementation of these.

OUR ACTIONS

We will take the following actions to minimise our environmental impact:

- Measure, and act to reduce, the carbon footprint of business activities.
- Measure, and act to reduce our use of energy, water and raw materials in our care homes.
- Seek to optimise the level of energy efficiency in our care homes where economically feasible.
- Design our new homes to meet the Very Good BREEAM standard for Refurbishment and fit-out.
- Reduce volumes of waste generated, reuse rather than dispose where possible and promote the recycling of unavoidable waste.
- Set targets to reduce food waste in our care homes and measure progress against these targets.
- Run environmental awareness courses including training as part of the induction process for new staff members.
- Work with suppliers and contractors to encourage them to minimise the impact of their operations on the environment and actively support our environmental programmes through an environmentally sensitive purchasing policy.

OUR SOCIAL CONDUCT

We recognise the importance of our relationships with our people, our residents, our suppliers and the communities where we operate. We value engaging in an open and constructive manner to maintain and improve our business operations. Our respect for each individual is integral to our culture and values in operating as a responsible business.

We will:

- Create a positive and rewarding workplace for our people.
- Ensure compliance with workplace health and safety laws and standards, and mitigate risks to health and safety in the workplace.
- Maintain suitable privacy and data security measures in respect of all stakeholders of Springfield.



- Maintain an inclusive and collaborative workplace where the wellbeing of our people and our residents is a high priority.
- Seek to support our people and our residents as we fulfil our commitment to be a lifelong partner to them, including championing Equity, Diversity & Inclusion initiatives so differences such as gender, ethnicity, physical appearance, age, religion, disability, education and beliefs are valued.
- Provide and maintain a working environment free from all forms of discrimination, harassment and bullying under any circumstances.
- Encourage our people to participate in appropriate further education and training to advance talent pipelines. This includes allowing paid time-off where circumstances permit, and any education or training that Springfield itself is able to provide in-house.
- Encourage and assist to provide a good work-life balance with a flexible and considerate approach to the health, wellbeing and working practices for our people.
- Promote the protection of human rights and welfare within our own business activities, as well as those of our supply chain, in accordance with our Code of Conduct and the UK Modern Slavery and Human Trafficking Policy.
- Encourage our people to participate in and to make positive contributions and promote well-being in the communities within which we operate.

OUR ACTIONS

We will take the following actions to demonstrate our commitment to our people, our residents, our suppliers and the communities where we operate:

- Undertake regular health and safety risk assessments and provide training and equipment to mitigate the risk of accident or injury as appropriate.
- Conduct our annual employee satisfaction survey – the Workplace Wellbeing Survey.
- Continued provision of our employee benefits package that includes a healthcare plan offering access to medical, dental and eye services at a discounted rate, 24/7 online access to doctors and counsellors plus a discount card for use in 100's of stores.
- Embed our Wellbeing programme by growing our team of mental health first aiders with MHFA England by establishing a network of wellbeing forums and ambassadors in each home, starting with our York and Garforth homes.
- Progress our work with Men's Health Unlocked (MHU) at all our Leeds based homes, improving the levels of digital inclusion and access to related resources to improve mental health and wellbeing of our residents.
- Provide ongoing support to new care staff to complete their Care Certificate, where appropriate.



- Design and agree individual development plans on a one-to-one basis and with consideration to our business needs as well as our colleague's development requirements; including specific roles such as Dignity or Dementia champion or access to the Nursing Associate Programme.
- Support legitimate workplace apprenticeships, internships, work experience and other similar programmes.
- Uphold our Equal Opportunities Policy, supported by equality and diversity awareness training for our managers and our people.
- Provide relevant training to our people on expectations for acceptable behaviour and conduct.
- Maintain our Grievance policy and Whistleblowing Policy that enables our people to raise potential concerns regarding unacceptable practices and behaviours within the company without fear of reprisal.
- Conduct appropriate employment checks to ensure eligibility to work and potential implications in relation to child labour and modern slavery.
- Continued engagement with local communities; inviting people to join us at Christmas, partnering with schools, choirs and dance groups to pay regular visits to our care homes.
- Regular engagement under Nurturing Innovation in Care Homes in Leeds (NICHE-Leeds) to develop solutions to enhance the lives of people living in or working in care homes face and their loved ones.

CONDUCT OF OUR BUSINESS

- We conduct our business with integrity and seek to ensure that our non-executive directors, investment manager, administrator and other businesses engaged by us, including advisers, contractors, and agents, do the same.

We will:

- Conduct our business ethically, without bribery, corruption, or any type of fraudulent business practice.
- Avoid conflict of interest in our business dealings and operate with full transparency.
- Safeguard confidential and personal information and obey applicable data privacy laws and regulations.
- Not offer or accept gifts and entertainment where to do so constitutes inappropriate inducements.
- Not engage or facilitate deliberate illegal tax evasion.
- Establish clear and effective governance for ESG, promoting the use of best practice on corporate governance when relevant and possible, setting goals and establishing accountability.



OUR ACTIONS

- Put in place a supplier code of conduct. This is in addition to our existing code of conduct for staff and policies on anti-corruption and bribery, equal opportunity, equality and diversity, complaints and whistleblowing.
- Conduct our business activities at all times with our residents and staff at the centre of decision making
- Provide training to our people on ethics and responsible conduct in their business activities and behaviours.

RESPONSIBILITIES AND MONITORING

This Policy is led by our CEO with full support from the Springfield Board. The Springfield ESG Steering Group will assist the Board in providing the operational leadership, direction, reporting and oversight of the Policy throughout the Company.

The Board will also be responsible for the implementation of the Policy and will formally review it annually and update as necessary.

This ESG Policy Statement is produced by the Directors of Springfield ("Springfield"). It will be published on our public website. It is subject to version control. Date of issue: 06 April 2023.

Graeme Lee
Founder and Group CEO
Springfield Healthcare Group

