Group Modern Slavery Transparency Statement

INTRODUCTION

This statement is made by Springfield Properties Plc ("**Springfield**") on its own behalf and on behalf of the subsidiary companies listed on the final page (the "**Group**"). This statement is made in accordance with section 54 of the Modern Slavery Act 2015 (the "**MSA**") and covers the financial year ending 31 May 2021.

Springfield supports and is committed to the objectives of the MSA. We are committed to trading ethically and to the highest standard. We recognise our responsibility under the MSA and aim to ensure that no modern slavery, human trafficking or forced labour is present in any part of our business or supply chain.

This statement will be reviewed and updated annually in accordance with MSA.

OUR STRUCTURE

Springfield are Scotland's only listed housebuilder on the AIM market. We are the parent company of Dawn Homes Limited and Walker Group (Scotland) Limited. As a Group we trade directly via Springfield Properties Plc, Dawn Homes Limited and Walker Group (Scotland) Limited. We directly employ around 600 employees with sub-contractors and suppliers visiting our sites on a daily basis to carry out a range of work.

OUR BUSINESS

Springfield is a public limited company (SC031286). We trade solely in Scotland with offices in Elgin, Larbert and Glasgow. Our business involves buying land for developing, gaining planning consents and building private and affordable homes in Scotland. All of our active and past sites are in Scotland.

The annual turnover of Springfield for the financial year ended 31 May 2020 was £144.4m.

Our operations mean that we have no direct contact with countries that are generally regarded as most likely to have a risk of modern slavery and/or human trafficking. Further information about our business and supply chains can be found in our 2020 Annual Report which can be found in the Investor Relations section of our website.

We act ethically and with integrity. Our employee recruitment policy requires all potential employees to provide evidence of their entitlement to work in the UK. We are committed to fair employment practices and (as a minimum) to following all applicable employment laws.

SUPPLY CHAIN

Our supply chains include building contractors, sub-contractors, product suppliers and professional consultancies e.g. engineers and land surveyors. Other suppliers to our business are professional services firms such as lawyers, accountants, and other consultants.

Most of our onsite construction is carried out through our sub-contractors and our building materials sourced through suppliers.

Respecting human rights and environmental issues in the supply chain is ultimately our supplier's responsibility. That said, to date we have not been made aware of any human trafficking/slavery activities within our supply chains but if any were brought to our attention then we would act immediately in accordance with our legal and moral obligations.

ANNUAL REVIEW

During the current financial year, we have reviewed our practices, policies, and procedures. We consider that the risk of modern slavery within our Group is low. The main areas of risk of modern slavery to our business would be our sub-contractors and suppliers. We take this risk seriously and consider this when instructing new sub-contractors and suppliers. Our aim is to work with sub-contractors and suppliers who are also committed to tackling and preventing modern slavery.

We will continue to review the risk of modern slavery within our business and supply chain and update our applicable policies regularly.

Any queries in relation to this Modern Slavery Transparency Statement should be addressed to: Innes Smith, Springfield Properties Plc, Alexander Fleming House, 8 Southfield Drive, Elgin, IV30 6GR.

This statement has been approved by the board of directors of Springfield Properties Plc and is signed by Andrew Todd, Group Director and Company Secretary.

Signed:

1200

3 March 2021

Companies on behalf of which this s.54 Modern Slavery Act statement is made:

- 1. Springfield Properties plc
- 2. Glassgreen Hire Limited
- 3. SP Sub 2018 Limited
- 4. DHomes 2014 Holdings Limited
- 5. Dawn Homes Limited
- 6. Dawn (Robroyston) Limited
- 7. DHPL Limited
- 8. DHHG 1 Limited
- 9. Walker Holdings (Scotland) Limited
- 10. Walker Residential (Scotland) Limited
- 11. Walker Contracts (Scotland) Limited
- 12. Walker Group (Scotland) Limited
- 13. Craig Developments Limited