

DOWLAIS

Dowlais Group plc

Human Rights Policy

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DOWLAIS GROUP PLC
HUMAN RIGHTS POLICY

1. PURPOSE & SCOPE

- 1.1 This policy sets out Dowlais Group plc's policy on respecting Human Rights, including:
- (a) what is required of all Employees in order to respect Human Rights and ensure they are respected in the Group's business and supply chains; and
 - (b) how to report any actual or suspected breaches of Human Rights relating to the Group's business.
- 1.2 This policy applies to all Business Units and to all Employees.
- 1.3 Individual Business Units may adopt their own human rights policies and procedures reflecting their own operations and management structures, provided that they comply with the minimum standards of this policy.

2. APPROVAL & RESPONSIBILITY

- 2.1 This policy has been approved by the board of directors of Dowlais Group plc, who have ultimate responsibility for this policy and for ensuring it is adequately communicated to each Business Unit and the Group as a whole.
- 2.2 The CEO of each Business Unit is responsible for ensuring awareness of and compliance with this policy within their Business Unit and for establishing a "culture" of compliance. This includes ensuring effective dissemination of this policy throughout the Business Unit, providing relevant guidance and training, and appropriate safeguards, monitoring and resources.
- 2.3 All Employees are responsible for observing and complying with all applicable provisions of this policy and for avoiding any activity that might lead to, result in or suggest a breach of this policy.

3. WHAT ARE HUMAN RIGHTS?

In this policy, references to "**Human Rights**", mean internationally recognised standards and principles of human rights, including those set out in the United Nations Universal Declaration of Human Rights, the 10 principles of the United Nations Global Compact and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work. References to "**breaching**" Human Rights, mean acting inconsistently with these principles or with the specific requirements of this policy.

4. POLICY STATEMENT

- 4.1 The Group is committed to respecting Human Rights.
- 4.2 It is Group policy to ensure that Human Rights are respected at all times, in the way the Group run its business and through its processes, behaviours, operations and conduct.
- 4.3 The Group is also committed to respecting Human Rights throughout its supply chains.
- 4.4 This policy should be read in conjunction with the Group's **Anti-Slavery & Human Trafficking Policy** (LEG-ETH-002) and **Diversity, Equity & Inclusion Policy** (LEG-ETH-003).
- 4.5 The remainder of this policy sets out specific ways in which the Group will respect Human Rights.

5. FORCED LABOUR, SLAVERY & HUMAN TRAFFICKING

- 5.1 Slavery & Human Trafficking is a crime and a violation of fundamental human rights. It is entirely contrary to The Group's policy and values.
- 5.2 The Group has a zero-tolerance approach to Slavery & Human Trafficking in its business. The Group is committed to investing in, implementing and enforcing effective systems and controls across its business to safeguard against the risk of Slavery & Human Trafficking occurring in its business and supply chains.
- 5.3 Any conduct within the Group's own operations which constitutes or might be construed as Slavery & Human Trafficking is strictly prohibited.
- 5.4 The Group is also committed to tackling Slavery & Human Trafficking throughout its supply chains, consistent with the Group's disclosure obligations under the Modern Slavery Act 2015
- 5.5 The Group expects the same zero-tolerance approach to Slavery & Human Trafficking from its Suppliers.
- 5.6 The above principles are reflected in the Group's **Anti-Slavery & Human Trafficking Policy** (LEG-ETH-002)

6. COMMUNITIES & INDIGENOUS PEOPLE

The Group is committed to respecting the rights of communities and indigenous people. The rights and title to property and land of the individual, indigenous people and local communities will be respected and the Group will ensure that any negotiations with regard to their property or land, including the use of and transfers of it, will adhere to the principles of free, prior and informed consent, contract transparency and disclosure.

7. CHILD LABOUR

The Group believes that children should not be exploited in any way. The Group does not tolerate the use of child labour and prohibit the hiring of those younger than the relevant legal minimum age for employment or the age of completion of compulsory education, other than via legitimate work placement or experience schemes.

8. DIVERSITY, EQUITY & INCLUSION

- 8.1 The Group understands the importance of diversity, equity and inclusion, and aims to ensure its workforce is diverse, equitable, and inclusive, free from bullying, harassment, victimisation and unlawful discrimination.
- 8.2 For the purposes of this policy, diversity includes diversity of all types of individual characteristic, such as gender, race, ethnicity, country of origin, nationality, colour, geographic location, social and cultural background or class, religion or religious beliefs, political opinion, marital or civil partner status, family responsibilities (including pregnancy, maternity or paternity), sex, sexual orientation, age and disability or any other individual characteristic protected by applicable law
- 8.3 The Group is committed to providing an inclusive working environment where all Employees and other people with whom the Group deals are treated fairly and with dignity and respect,
- 8.4 The Group will not tolerate disrespectful or inappropriate behaviour, unfair treatment or retaliation, unlawful discrimination, bullying, harassment or victimisation, of any kind. This includes such treatment in the workplace and in work-related situations outside the workplace. The Group will fully and thoroughly investigate reports of such behaviour. Employees who are found to have participated in such behaviour may be subject to disciplinary action or dismissal.
- 8.5 The Group values the diversity of its Employees and the contributions they make.

- 8.6 The Group understands equity means fair access to opportunities and fair treatment, through purposeful actions to remove systemic, group and individual barriers.
- 8.7 The Group is a meritocracy and will ensure that the basis for recruitment, hiring, placement, training, compensation and advancement at the Group will always be qualifications, performance, skills and experience
- 8.8 However, the Group understands the importance of diversity in its workforce to its long-term success and will seek to encourage diversity within its workforce, whilst always respecting these principles.
- 8.9 The above principles are reflected in the Group's **Diversity, Equity & Inclusion Policy** (LEG-ETH-003).

9. FREEDOM OF ASSOCIATION & COLLECTIVE BARGAINING

- 9.1 The Group recognises Employees' rights to join, form or not join a trade or labour union, and to bargain collectively as permitted by applicable laws. These rights will not be improperly restricted or interfered with by the Group.
- 9.2 Where Employees are represented by a legally recognised union or representative body, the Group is committed to establishing a constructive dialogue with their freely-chosen representatives.

10. EMPLOYMENT TERMS

- 10.1 The Group is committed to operating in compliance with all applicable laws relating to wages, pay, benefits and working hours. If circumstances are identified where the Group is not respecting these laws, it will promptly correct this.
- 10.2 Reflecting Article 7 of the International Labour Organisation's Private Employment Agencies Convention 1997, the Group expects private employment agencies with whom it works to not charge directly or indirectly, in whole or in part, any fees or costs to workers.

11. HEALTH & SAFETY & WORKING CONDITIONS

- 11.1 The Group is committed to providing a safe workplace which complies with all applicable health and safety laws and with the Group's health and safety policies.
- 11.2 The Group is dedicated to minimising the risk of accidents and injury and to engaging with Employees to continually improve health and safety in its workplaces.
- 11.3 In addition to ensuring a safe workplace, the Group is also committed to ensuring that its workplaces constitute an acceptable working environment for Employees (and any other people who visit or work at the Group's sites) in which they feel comfortable working.

12. RESPECTING HUMAN RIGHTS IN THE GROUP'S SUPPLY CHAINS

- 12.1 In addition to respecting Human Rights in the Group's business and operations, the Group expects the same high standards from its Suppliers in their business and operations. These standards are set out in the Group's Supplier Code of Conduct.
- 12.2 Any Supplier who is unwilling to agree to respect Human Rights should not be dealt with.
- 12.3 Throughout the duration of the Group's relationship with each Supplier, Employees who deal with that Supplier must be vigilant and monitor the Supplier's behaviour for evidence that they may be engaged in practices which constitute breaches of Human Rights. This should include paying particular attention when undertaking Supplier site visits, quality reviews, or other events when employees or workers of the Supplier may be present.

- 12.4 In the event that any behaviour that might constitute a breach of Human Rights is suspected, it should be reported as set out in paragraph 13 so that further investigation can be undertaken. Such investigation should be undertaken at the direction of the Chief Procurement Officer and the General Counsel of the Business Unit concerned.
- 12.5 If following any such investigation any Supplier is determined to be engaging (or to be likely to be engaging) in breaches of Human Rights:
- (a) if not currently supplying goods or services to the Group, the Supplier should be eliminated from any selection process so that the Supplier is no longer capable of supplying goods or services to the Group in the future; or
 - (b) if currently supplying goods or services to the Group, efforts should be made to ensure that the Supplier immediately ceases to engage in breaches of Human Rights and the Group should cease dealing with the Supplier soon as practicable whilst avoiding any disruption or damage to the Group's operations.

13. RAISING CONCERNS

- 13.1 The detection and reporting of actual or suspected breaches of Human Rights in any part of the Group's business or supply chains is the responsibility of all Employees.
- 13.2 All Employees must raise concerns about any actual or suspected breaches of Human Rights at the earliest possible stage. This should be done in accordance with the processes set out in the Group's **Whistleblowing Policy** (LEG-COMPL-003).
- 13.3 If any Employee is unsure whether a particular act, the treatment of workers more generally, or their working conditions within any tier of the Group's supply chains constitutes a breach of Human Rights or a breach of this policy, relevant details should be provided to the General Counsel of the relevant Business Unit.

14. TRAINING & AWARENESS

Business Units must provide adequate and regular training to relevant Employees on identifying and reporting suspected breaches of Human Rights. The specific training provided may be tailored to the requirements of each Business Unit. Records of completion of such training must be reported to the General Counsel on request.

15. BREACHES OF THIS POLICY

Any breach of this policy by an Employee may lead to disciplinary action being taken by the Group up to and including termination of employment. Where appropriate, the Group will also liaise with relevant law enforcement bodies.

16. RECORDKEEPING

All Business Units must ensure that sufficient records are kept to evidence compliance with this policy. Copies of all such records must be provided to the General Counsel on request.

17. DEFINITIONS

- 17.1 "**Business Unit**" means any business unit from time to time of the Group, including the central functions of the Group.
- 17.2 "**Employee**" means all employees or workers within the Group, which includes full time and part time employees and other workers including contractors, agency workers, interns, apprentices and volunteers.

- 17.3 “**Group**” means Dowlais Group plc and all subsidiary companies over which it exercises control, including all Business Units.
- 17.4 “**Human Rights**” has the meaning set out in paragraph 3.1 above.
- 17.5 “**Slavery & Human Trafficking**” includes slavery, servitude, forced, compulsory or bonded labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.
- 17.6 “**Supplier**” means the any supplier of goods and/or services to the Group.