

DOWLAIS

Dowlais Group plc

Anti-Slavery & Human Trafficking Policy

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INDEX

Section	Page
1. Purpose & Scope	3
2. Approval & Responsibility	3
3. What is Slavery & Human Trafficking?	3
4. Policy Statement	3
5. Slavery & Human Trafficking in the Group's Supply Chains	4
6. Raising Concerns	4
7. Training & Awareness	4
8. Breaches of this Policy	4
9. Recordkeeping	5
10. Definitions	5

DOWLAIS GROUP PLC

ANTI-SLAVERY & HUMAN TRAFFICKING POLICY

1. PURPOSE & SCOPE

- 1.1 This policy sets out Dowlais Group plc's policy on preventing Slavery & Human Trafficking in our business and supply chains.
- 1.2 This policy applies to all Business Units and to all Employees.
- 1.3 Individual Business Units may adopt their own anti-slavery and human trafficking 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 IS SLAVERY & HUMAN TRAFFICKING?

- 3.1 For the purposes of this policy, "**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.
- 3.2 Slavery & Human Trafficking can take a variety of forms and may not always be obvious. Therefore in the event of any doubt as to whether any particular conduct constitutes or might constitute Slavery & Human Trafficking for the purposes of this policy, advice should be taken from the relevant Business Unit's Legal Function.

4. POLICY STATEMENT

- 4.1 Slavery & Human Trafficking is a crime and a violation of fundamental human rights. It is entirely contrary to The Group's policy and values.
- 4.2 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.
- 4.3 Any conduct within the Group's own operations which constitutes or might be construed as Slavery & Human Trafficking is strictly prohibited.
- 4.4 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

4.5 The Group expects the same zero-tolerance approach to Slavery & Human Trafficking from its Suppliers.

5. **SLAVERY & HUMAN TRAFFICKING IN THE GROUP'S SUPPLY CHAINS**

5.1 The Group's zero-tolerance approach to Slavery & Human Trafficking also applies to its supply chains.

5.2 Any Supplier who objects to, or acts inconsistently with, the Group's zero-tolerance approach to Slavery & Human Trafficking must not be dealt with.

5.3 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 Slavery & Human Trafficking. 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.

5.4 In the event that any behaviour that might constitute Slavery & Human Trafficking is suspected, it should be reported as set out in paragraph 6 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.

5.5 If following any such investigation any Supplier is determined to be engaging (or to be likely to be engaging) in Slavery & Human Trafficking:

- (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 Slavery & Human Trafficking and the Group should cease dealing with the Supplier soon as practicable whilst avoiding material disruption or damage to the Group's operations.

6. **RAISING CONCERNS**

6.1 The detection and reporting of actual or suspected Slavery & Human Trafficking in any part of the Group's business or supply chains is the responsibility of all Employees.

6.2 All Employees must raise concerns about any actual or suspected Slavery & Human Trafficking 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).

6.3 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 any of the various forms of Slavery & Human Trafficking or a breach of this policy, relevant details should be provided to the General Counsel of the relevant Business Unit.

7. **TRAINING & AWARENESS**

Business Units must provide adequate and regular training to relevant Employees on identifying and reporting suspected Slavery & Human Trafficking. 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.

8. **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.

9. 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.

10. DEFINITIONS

- 10.1 “**Business Unit**” means any business unit from time to time of the Group, including the central functions of the Group.
- 10.2 “**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.
- 10.3 “**Group**” means Dowlais Group plc and all subsidiary companies over which it exercises control, including all Business Units.
- 10.4 “**Slavery & Human Trafficking**” has the meaning set out in paragraph 3.1 above.
- 10.5 “**Supplier**” means the any supplier of goods and/or services to the Group.