

# DOWLAIS

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**Dowlais Group plc**

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**Product Safety Policy**

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**DOWLAIS GROUP PLC**  
**PRODUCT SAFETY POLICY**

**1. PURPOSE & SCOPE**

- 1.1 This policy sets out Dowlais Group plc's policy on product safety.
- 1.2 This policy applies to all Business Units and to all Employees.
- 1.3 Individual Business Units may adopt their own product safety 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. POLICY STATEMENT**

- 3.1 For the purposes of this policy, ensuring "**Product Safety**" means protecting the public from an unreasonable risk of accident, injury, or death because of a defect in design, manufacturing, or specifications of the Group's products while meeting legal, customer, and industry product safety requirements.
- 3.2 The Group recognises that its products are used in safety critical applications, both in the Automotive industry and in the other industries in which the Group operates. The Group's policy is to have a proactive Product Safety culture where safety defects in design, manufacturing, and specifications are avoided. This will ensure that the Group's products in the field do not cause an accident, injury, or death. This policy includes:
  - (a) Product Safety being integrated into all aspects of Business Unit's design and manufacturing processes.
  - (b) A culture and working practices in which all Employees are responsible for Product Safety, such that any Employee with any concerns regarding product safety must immediately report those concerns in accordance with the relevant procedures adopted by their Business Unit.
  - (c) Rapidly escalating and addressing concerns, such that in the event of any potential Product Safety concern, Business Units act quickly to prevent escapes with a goal of zero recalls. Ensuring that safety concerns are subject to an appropriate internal review process with governance that ensures adequate independence of decision-making.
  - (d) Continuous improvement, in which Business Units are expected to reflect globally on Product Safety lessons learned, with a goal of zero repeat issues.

#### 4. **AUTOMOTIVE INDUSTRY QUALITY MANAGEMENT STANDARDS**

Those Business Units which operate within the Automotive industry are expected to be accredited to IATF 16949, an automotive quality management standard, which includes applicable requirements related to product safety.

#### 5. **RAISING CONCERNS**

All Employees must raise concerns about any actual or suspected Product Safety concerns, or breaches of this policy, at the earliest possible stage. This should be done in accordance with their Business Unit's Product Safety procedures, or the processes set out in the Group's **Whistleblowing Policy** (LEG-COMPL-003).

#### 6. **TRAINING & AWARENESS**

Business Units must provide adequate and regular training to relevant Employees on product safety and quality. 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.

#### 7. **DEFINITIONS**

- 7.1 “**Business Unit**” means any business unit from time to time of the Group, including the central functions of the Group.
- 7.2 “**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.
- 7.3 “**Group**” means Dowlais Group plc and all subsidiary companies over which it exercises control, including all Business Units.