

# DOWLAIS

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**Dowlais Group plc**

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**Diversity, Equity & Inclusion Policy**

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## **DOWLAIS GROUP PLC**

### **DIVERSITY, EQUITY & INCLUSION POLICY**

#### **1. PURPOSE & SCOPE**

- 1.1 This policy sets out Dowlais Group plc's policy on diversity, equity and inclusion in its workforce.
- 1.2 This policy applies to all Business Units and to all Employees.
- 1.3 Individual Business Units may adopt their own diversity, equity and inclusion 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 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.

##### **Diversity, Equity & Inclusion**

- 3.2 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
- 3.3 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,
- 3.4 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.

##### **Promoting Diversity, Equity & Inclusion**

- 3.5 The Group values the diversity of its Employees and the contributions they make.
- 3.6 The Group understands equity means fair access to opportunities and fair treatment, through purposeful actions to remove systemic, group and individual barriers.

3.7 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

3.8 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.

#### 4. RAISING CONCERNS

All Employees must raise concerns about any actual or suspected breaches of this policy at the earliest possible stage. This should be done in accordance with the processes set out in our **Whistleblowing Policy** (LEG-COMPL-003).

#### 5. 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.

#### 6. 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.

#### 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.