DOWLAIS

Dowlais Group plc

Health & Safety Policy

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DOWLAIS GROUP PLC

HEALTH & SAFETY POLICY

1. PURPOSE & SCOPE

- 1.1 This policy sets out Dowlais Group plc's policy on health and safety in its operations.
- 1.2 This policy applies to all Business Units and to all Employees.

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 line managers are accountable for the safety of Employees they supervise and have a duty to promote and enforce good health and safety policies.
- 2.4 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

The Group is committed to:

- 3.1 maintaining the highest standards for health and safety throughout its operations;
- 3.2 complying with Health & Safety Laws;
- 3.3 ensuring sustainable and effective management systems are in place to prevent injuries and protect the health of everyone in the Group's premises (employees, contractors, and visitors) and to provide safe and healthy workplaces for everyone, with a focus on continuous improvement to ensure the reduction of risks;
- 3.4 creating a working environment where all Employees (and where relevant their representatives) are involved in the continuous improvement of the Group's health & safety processes and management systems and everyone feels responsible for their own safety and the safety of others in order to encourage behaviour-based safety;
- 3.5 defining clear objectives for health and safety improvement and the timely implementation of identified improvements;
- 3.6 evaluating and managing health and safety risks in the Group's operations.
- 3.7 ensuring that all Employees have the required knowledge, skill, and competence to maintain high standards of health and safety; and
- 3.8 allocating appropriate resources to ensure the effective implementation of this policy.

4. HEALTH & SAFETY MANAGEMENT SYSTEMS

It is the Group's policy that all its manufacturing sites must have an occupational health and safety management system which is certified to the ISO 45001 standard.

5. 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 the Group's **Whistleblowing Policy** (LEG-COMPL-003).

6. **DEFINITIONS**

- 6.1 **"Business Unit"** means any business unit from time to time of the Group, including the central functions of the Group.
- 6.2 **"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.
- 6.3 "**Group**" means Dowlais Group plc and all subsidiary companies over which it exercises control, including all Business Units.
- 6.4 "Health & Safety Laws" means all laws, statutes, regulations, subordinate legislation, bye-laws, common law and other national, international, federal, supranational, state and local laws, judgments, decisions and injunctions of any court or tribunal, and legally binding codes of practice and guidance notes which from time to time apply to the Group to the extent that they relate to or apply to the health and safety of any Employee.