

DOWLAIS

Dowlais Group plc

Environmental Policy

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DOWLAIS GROUP PLC
ENVIRONMENTAL POLICY

1. PURPOSE & SCOPE

- 1.1 This policy sets out Dowlais Group plc's policy on respecting and protecting the Environment.
- 1.2 This policy applies to all Business Units and to all Employees.
- 1.3 Individual Business Units may adopt their own environmental 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 is committed to:
 - (a) respecting and protecting the Environment;
 - (b) minimising the potential negative impact that its business may have on the Environment over the longer term; and
 - (c) complying with Environmental Laws.
- 3.2 The remainder of this policy sets out specific ways in which the Group will respect and protect the Environment and seek to reduce and minimise any potential negative impact that its business may have on the Environment.

4. CLIMATE CHANGE & EMISSIONS

- 4.1 The Group recognises the serious threat posed by climate change and the urgent need for meaningful action.
- 4.2 The Group is committed to addressing climate change and to reducing Greenhouse Gas emissions in such a way as supports the goals of the Paris Agreement.
- 4.3 The Group will invest in improving its operations to minimise their impact on climate change and make them less vulnerable to climate-related risks, while safeguarding their long-term commercial success.

5. BIODIVERSITY

5.1 The Group is committed to protecting biodiversity wherever it operates, by minimising the impact of its activities on the environment.

5.2 More specific details are set out in the Group's **Biodiversity Policy** (SUS-ENV-002).

6. WATER

6.1 The Group is committed to reducing its water consumption.

6.2 More specific details are set out in the Group's **Water Policy** (SUS-ENV-003).

7. ENERGY

7.1 The Group is committed to reducing its energy consumption and to increasing the proportion of its energy which is sourced from renewable sources.

7.2 More specific details are set out in the Group's **Energy Policy** (SUS-ENV-004).

8. WASTE

The Group is committed to reducing the amount of waste it generates and to divert waste from landfill.

9. PRODUCTS

9.1 The Group is committed to reducing and minimising the impact which its products have on the Environment.

9.2 The Group will continue to work closely with customers to deliver solutions that address Environmental challenges, by developing products that optimise energy efficiency and help customers reduce their greenhouse gas emissions, water consumption and waste generation.

9.3 The Group will assess the impact of its products on the Environment in terms of material usage, waste, energy usage and CO₂ emissions throughout the product life cycle where possible and practicable. By incorporating circular economy principles into their design and manufacturing processes, the Group will can reduce the Environmental impact of its products and ensure greater durability, longevity and reduced waste.

10. ENVIRONMENTAL MANAGEMENT SYSTEMS

It is the Group's policy that all its manufacturing sites must have an environmental management system which is certified to the ISO 14001 standard.

11. 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).

12. DEFINITIONS

12.1 "**Business Unit**" means any business unit from time to time of the Group, including the central functions of the Group.

12.2 "**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.

- 12.3 “**Environment**” means the natural and human-made environment including all or any of the following media: air (including air within buildings and other natural or human-made structures above or below the ground), water, land, and any ecological systems and living organisms (including humans) supported by those media.
- 12.4 “**Environmental 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 Environment, energy efficiency or climate change.
- 12.5 “**Greenhouse Gas**” means any natural or anthropogenic gas which traps thermal radiation in the earth’s atmosphere, including carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs) and sulphur hexafluoride (SF₆).
- 12.6 “**Group**” means Dowlais Group plc and all subsidiary companies over which it exercises control, including all Business Units.