

# DOWLAIS

---

**Dowlais Group plc**

---

**Biodiversity Policy**

---

Date: **01.03.2023**

---

Classification: **Public**

---

Identifier: **SUS-ENV-002**

---

Version: **1.0**

---

## INDEX

<b>Section</b>		<b>Page</b>
1.	Purpose & Scope	2
2.	Approval & Responsibility	2
3.	Policy Statement	2
4.	No Net Loss	3
5.	Legally Designated Protected Areas	3
6.	High Conservation Value (HCV) Areas & Threatened & Protected Species	3
7.	Free, Prior and Informed Consent (FPIC) of Indigenous Peoples	3
8.	Trade in Endangered Species of Wild Fauna & Flora	3
9.	Raising Concerns	4
10.	Definitions	4

## **DOWLAIS GROUP PLC**

### **BIODIVERSITY POLICY**

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

- 1.1 This policy sets out Dowlais Group plc's policy on biodiversity. The purpose of this policy is to demonstrate the Group's commitment towards protecting biodiversity and minimising the potential negative impact that the Group's businesses may have on biodiversity and the natural environment over the longer term.
- 1.2 This policy applies to all Business Units and to all Employees.
- 1.1 Individual Business Units may adopt their own biodiversity-related policies and procedures reflecting their own operations and management structures, provided that they comply with the minimum standards of this policy.
- 1.2 This policy is adopted in accordance with our **Environmental Policy** (SUS-ENV-001).

#### **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 Biodiversity is defined as the variety of plant and animal life in the world or in a particular habitat, a high level of which is usually considered to be important and desirable.
- 3.2 Biodiversity is critical to the health and stability of natural capital as it provides resilience to shocks like floods and droughts, and supports fundamental processes such as the carbon and water cycles as well as soil formation. Biodiversity is both a part of natural capital and a critical element that underpins ecosystem services.
- 3.3 The Group recognises the importance of biodiversity and its fundamental role in society. The Group therefore aims to preserve biodiversity and ensure future generations can enjoy its benefits
- 3.4 This policy sets out the Group's commitment to incorporate biodiversity into the Group's strategy and to define the key aspects that are expected of the Group to promote the growth of the natural world and help prevent deforestation across the Group's operations.
- 3.5 The remainder of this policy sets out specific ways in which the Group will seek to preserve biodiversity.

#### **4. NO NET LOSS**

- 4.1 No Net Loss is defined as the point at which biodiversity impacts of development projects are balanced and minimised.
- 4.2 These include on-site restoration and where possible, offsetting significant residual impacts, on a local, landscape-level, national, regional geographic scale.
- 4.3 We will seek to adopt the “No Net Loss” principle in our operations, seek opportunities to reduce deforestation wherever possible, and seek to recompensate any potential negative biodiversity impacts with future reforestation and regeneration projects.

#### **5. LEGALLY DESIGNATED PROTECTED AREAS**

- 5.1 The United Nations List of Protected Areas is a list of terrestrial, coastal and marine protected areas designated by governments around the world. They are defined as locations which receive protection because of their recognised ecological values. Locations can include national or regional parks and other conservation areas.
- 5.2 Protected areas are the cornerstone of biodiversity conservation. They maintain key habitats, provide refugia, allow for species’ migration and movement and ensure the maintenance of natural processes across the landscape.
- 5.3 It is the Group’s policy to respect these protected areas and ensure that there is no negative impact of the Group’s operations on these protected areas.

#### **6. HIGH CONSERVATION VALUE (HCV) AREAS & THREATENED & PROTECTED SPECIES**

- 6.1 High Conservation Value Areas (“**HCVs**”) are natural habitats (e.g. a forest, a grassland, a watershed, or a landscape-level ecosystem) or sites of outstanding significance or critical importance, where threatened and protected species reside, and where appropriate management is required in order to maintain or enhance the identified values. Threatened species are any species (including animals, plants and fungi) which are vulnerable to endangerment in the near future while protected species are species of animal or plant which is forbidden by law to harm or destroy.
- 6.2 HCVs can contain threatened and protected species that require conservation. In order to preserve natural ecosystems, it is the Group’s policy to respect HCVs, to avoid the conversion of HCV areas and any potential negative impacts on threatened and protected species, to ensure that there is no negative impact of the Group’s operations on HCVs or other sites that are near or contain globally or nationally important biodiversity.

#### **7. FREE, PRIOR AND INFORMED CONSENT (FPIC) OF INDIGENOUS PEOPLES**

- 7.1 FPIC is a specific right that pertains to indigenous peoples and is recognised in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP).
- 7.2 It allows indigenous people to give or withhold consent to a project that may affect them or their territories.
- 7.3 The Group recognises the importance of indigenous communities and understands that their livelihoods largely depend on the respect of their land. It is the Group’s policy to respect their rights through providing FPIC to local communities and indigenous people, before commencing any relevant development projects that may affect them or their territories.

#### **8. TRADE IN ENDANGERED SPECIES OF WILD FAUNA & FLORA**

The Convention on International Trade in Endangered Species of Wild Fauna and Flora (“**CITES**”) is a multilateral treaty intended to protect endangered plants and animals and ensure

that international trade in specimens of wild animals and plants does not threaten the survival of the species. It is the Group's policy not to participate in the trade of CITES species in any way.

## 9. 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).

## 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.