

DOWLAIS

Dowlais Group plc

Energy Policy

Date: **01.03.2023**

Classification: **Public**

Identifier: **SUS-ENV-004**

Version: **1.0**

INDEX

Section		Page
1.	Purpose & Scope	3
2.	Approval & Responsibility	3
3.	Policy Statement	3
4.	Raising Concerns	4
5.	Definitions	4

DOWLAIS GROUP PLC

ENERGY POLICY

1. PURPOSE & SCOPE

- 1.1 This policy sets out Dowlais Group plc's policy on being a responsible energy user, to reduce the Group's environmental impact.
- 1.2 This policy applies to all Business Units and to all Employees.
- 1.3 Individual Business Units may adopt their own energy-related policies and procedures reflecting their own operations and management structures, provided that they comply with the minimum standards of this policy.
- 1.4 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

The Group is committed to:

- (a) Reducing its energy usage and improving energy efficiency in its operations.
- (b) Increasing its use of decarbonised energy sources where available and commercially viable.
- (c) Identifying the Group's energy impact and the main areas and type of energy consumed in its buildings, sites, processes and from transport.
- (d) Complying with Energy Laws.
- (e) Developing energy efficient products.
- (f) Working constructively with the Group's customers to support their energy efficiency activities.
- (g) Working constructively with the Group's supply chain to identify opportunities to approve their energy efficiency.
- (h) Continually review its management processes to improve and the adequacy and effectiveness of its energy performance.

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

5. DEFINITIONS

- 5.1 “**Business Unit**” means any business unit from time to time of the Group, including the central functions of the Group.
- 5.2 “**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.
- 5.3 “**Energy 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 energy efficiency, usage or consumption.
- 5.4 “**Group**” means Dowlais Group plc and all subsidiary companies over which it exercises control, including all Business Units.