

# DOWLAIS

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**Dowlais Group plc**

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**Conflict Minerals Policy**

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## **DOWLAIS GROUP PLC**

### **CONFLICT MINERALS POLICY**

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

- 1.1 This policy sets out Dowlais Group plc's policy on the sourcing of Conflict Minerals and the due diligence required to ascertain the presence of Conflict Minerals in our supply chain.
- 1.2 This policy applies to all Business Units and to all Employees.
- 1.3 Individual Business Units may adopt their own conflict minerals 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. WHAT ARE CONFLICT MINERALS?**

For the purposes of this policy, "**Conflict Minerals**" are Cassiterite (Tin), Coltan (Tantalum), Wolframite (Tungsten) and Gold (or derivatives of these minerals) (collectively referred to as "**3TG**") which are mined in the Democratic Republic of Congo ("**DRC**") or an adjoining country (Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia), and which directly or indirectly finance or benefit armed groups in the DRC or any adjoining country.

#### **4. POLICY STATEMENT**

- 4.1 The Group is committed to conducting business with integrity and in a responsible, ethical and sustainable manner. This applies to the Group's own business operations and to its global supply chain.
- 4.2 Consistent with this commitment, it is the Group's policy to adopt procedures, to the extent required by applicable laws or customer expectations, to seek to identify whether 3TG used in our products constitute Conflict Minerals, taking a risk-based approach.
- 4.3 Where it is identified that any material being purchased (or proposed to be purchased) by the Group constitutes or contains Conflict Minerals, it is the Group's policy to not use (or to cease to use) that material.

#### **5. EXPECTATIONS OF OUR SUPPLIERS**

- 5.1 As set out in the Group's **Responsible Sourcing Policy** (SUS-SOUR-001) the Group expects its Suppliers to operate their businesses in a way that supports the Group's commitment to acting ethically and responsibly.

- 5.2 The Group's policy on ethical sourcing and avoiding the use of Conflict Minerals should be communicated to all Suppliers at the outset of our business relationship with them and reinforced as appropriate thereafter. This can be done by providing our Suppliers with a copy of the Group's Supplier Code of Conduct, or the equivalent Supplier Code of Conduct adopted by any Business Unit.
- 5.3 Where the Group sources products or raw materials containing 3TG the Group shall, to the extent required by applicable laws or customer expectations, work with our Suppliers to ensure compliance with all applicable laws and regulations and seek to identify whether such 3TG products or materials constitute Conflict Minerals, taking a risk-based approach. As a minimum, relevant suppliers will then be required to: (a) perform due diligence to ascertain whether any 3TG products or materials constitute Conflict Minerals; and (b) complete a Conflict Minerals reporting template.
- 5.4 Business Units should request from its Suppliers any information they deems necessary, including certifications and documentation, to monitor and determine compliance with this policy. Business Units should also consider, on a risk-based basis, performing independent third party audits on Suppliers.

## 6. SOURCING PROCESSES

Each Business Unit must implement processes to ensure that their Supplier sourcing, selection, contracting and purchasing comply with the requirements of this policy.

## 7. 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).

## 8. DEFINITIONS

- 8.1 "**Business Unit**" means any business unit from time to time of the Group, including the central functions of the Group.
- 8.2 "**Conflict Minerals**" has the meaning set out in paragraph 3 above.
- 8.3 "**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.
- 8.4 "**Group**" means Dowlais Group plc and all subsidiary companies over which it exercises control, including all Business Units.
- 8.5 "**Supplier**" means any supplier of goods and/or services to any Business Unit.