

DOWLAIS

Dowlais Group plc

Sustainability Policy

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DOWLAIS GROUP PLC
SUSTAINABILITY POLICY

1. PURPOSE & SCOPE

- 1.1 This policy sets out Dowlais Group plc's policy on sustainability.
- 1.2 This policy applies to all Business Units and to all Employees.
- 1.3 Individual Business Units may adopt their own sustainability 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

The Group is committed to:

- (a) Developing a robust strategic approach to sustainability which addresses the Group's key sustainability impacts.
- (b) Completing periodic materiality assessments, to identify and assess the Group's key sustainability impacts.
- (c) Listening to relevant stakeholders to ensure their voices are heard insofar as they are relevant to sustainability topics.
- (d) Setting objectives, goals, indicators and targets to continually improve the Group's sustainability performance.
- (e) Demonstrating how the Group's strategy is aligned to and contributes to achieving the UN's Sustainable Development Goals (SDGs).
- (f) Embedding sustainability into the Group's corporate strategy.
- (g) Robust and transparent governance of the Group's sustainability strategy.
- (h) Ensuring Employees sustainability topics and how the Group's sustainability strategy impacts their roles and decision-making.
- (i) Embedding sustainability considerations into the Group's business decisions.
- (j) Considering sustainability-related risks as part of the Group's risk management processes.

- (k) Respecting and protecting the environment, minimising the potential negative impact that its business may have on the environment over the longer term and complying with environmental Laws.
- (l) Requiring our suppliers to improve their sustainability performance through our sourcing decisions and related policies and procedures.
- (m) Measuring and reviewing progress against the Group's sustainability objectives, goals and ambitions, communicating and reporting the Group's sustainability performance in an accurate and transparent way.

4. RELEVANT SUSTAINABILITY POLICIES

The Group's approach to specific sustainability related issues is set out in the following policies:

- (a) Our Code.
- (b) **Environmental Policy** (SUS-ENV-001).
- (c) **Human Rights Policy** (LEG-ETH-001).
- (d) **Anti-Slavery & Human Trafficking Policy** (LEG-ETH-002).
- (e) **Diversity, Equity & Inclusion Policy** (PEO-DIV-001).
- (f) **Health & Safety Policy** (PEO-H&S-001).
- (g) **Biodiversity Policy** (SUS-ENV-002).
- (h) **Water Policy** (SUS-ENV-003).
- (i) **Energy Policy** (SUS-ENV-004).
- (j) **Responsible Sourcing Policy** (SUS-SOUR-001).
- (k) **Conflict Minerals Policy** (SUS-SOUR-002).

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.