

# DOWLAIS

SLAVERY & HUMAN  
TRAFFICKING STATEMENT  
FOR THE FINANCIAL YEAR  
ENDED 31 DECEMBER 2025

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Dowlais Group plc

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**Slavery & Human Trafficking Statement for the Financial Year Ended 31 December 2025**

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Date: 26.01.2026

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# CONTENTS

1	STATEMENT ON SLAVERY & HUMAN TRAFFICKING .....	3
2	ORGANISATIONAL STRUCTURE, BUSINESSES & SUPPLY CHAINS .....	3
3	POLICIES .....	5
4	SLAVERY & HUMAN TRAFFICKING RISK ASSESSMENT & MANAGEMENT .....	7
5	DUE DILIGENCE & ASSURANCE .....	8
6	TRAINING & AWARENESS .....	9
7	KEY PERFORMANCE INDICATORS .....	9
8	OUTLOOK FOR 2026 .....	9
9	SECTION 54 OF THE MODERN SLAVERY ACT 2015 .....	10
10	APPROVAL .....	10

## 1 STATEMENT ON SLAVERY & HUMAN TRAFFICKING

Slavery can take various forms and may not always be obvious. It includes any form of slavery, servitude, forced, compulsory or bonded labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain ("**Slavery & Human Trafficking**").

Slavery & Human Trafficking is a crime and a violation of fundamental human rights. Dowlais Group plc ("**Dowlais**") and its subsidiary companies (collectively, the "**Group**") adhere to high ethical standards and are committed to investing in, implementing and enforcing effective systems and controls to safeguard against the risk of Slavery & Human Trafficking within its business operations and supply chains. The Group expects the same approach to Slavery & Human Trafficking from its suppliers.

This Slavery and Human Trafficking Statement outlines the steps taken by the Group to prevent Slavery & Human Trafficking occurring within their business operations and supply chains for the financial year ended 31 December 2025.

## 2 ORGANISATIONAL STRUCTURE, BUSINESSES & SUPPLY CHAINS

### *Dowlais*

Dowlais is located in the UK and is listed on the Main Market of the London Stock Exchange. It is the ultimate parent company of the Group, which is a specialist engineering group focused on the automotive sector. The Group aims to generate growth through a portfolio of transformative and innovative businesses, developing exceptional products that drive transformation.

The Group employs over 28,000 people in 22 countries across its two business units (GKN Automotive and GKN Powder Metallurgy (each a "**Business Unit**" and together the "**Business Units**") and the Dowlais central functions. For more information on Group revenue and 2025 performance, please visit [www.dowlais.com](http://www.dowlais.com).

### *GKN Automotive*

GKN Automotive is the world's leading drive systems supplier, serving 90% of global vehicle manufacturers and with content on almost 50% of new light vehicles worldwide. GKN Automotive has over 24,000 employees, including in its joint venture in China, and 47 manufacturing facilities in 17 countries across the Americas, Europe and Asia.

### *GKN Powder Metallurgy*

GKN Powder Metallurgy, the global leader in sintered metal products and the number one global supplier of powder metals, offers vertically integrated production capabilities that are unique among its competitors with a global presence. It has over 4,500 employees, 31 manufacturing sites and 3 global innovation centres in 9 countries across the Americas, Europe and Asia.

## **The Group's Supply Chains**

The Group's Business Units make use of local and global supply chains to supply raw materials, components and services to support their operations. They work directly with suppliers from over 50 countries.

Set out below are the top 10 countries in which the Group's direct suppliers are located and the Group's top 5 purchased direct commodities, in each case ranked by expenditure in 2025.

<b>Top 10 countries by supplier location</b>		
1.	USA	
2.	China	
3.	Germany	
4.	Korea	
5.	Japan	
6.	India	
7.	Italy	
8.	Spain	
9.	Mexico	
10.	United Kingdom	

<b>Top 5 direct commodities purchased</b>	
1.	<b>Forgings</b>
2.	<b>Steel</b>
3.	<b>Castings</b>
4.	<b>Powders</b>
5.	<b>Mechatronics</b>

Strong relationships with the Group's suppliers are vital in helping the Group achieve its strategic objectives. The Group aims to establish longstanding relationships with strategic suppliers, in whom it has confidence, not only in the quality and reliability of their products and services, but also in their ethical standards and approach to protecting human rights.

### 3 POLICIES

The Group's approach to Slavery & Human Trafficking is integrated into its broader approach to ethics, business conduct and risk management. There are Group policies that set out principles and specific requirements which its Business Units must comply with. However, the Group recognises that its Business Units have different operations, supply chains and risk profiles. Therefore, Business Units are permitted to adopt their own policies and procedures tailored to their operations and management structures, provided they comply with the minimum standards required of the Group.

The following Group policies are relevant to Slavery & Human Trafficking:

#### ***Our Code***

To ensure that everyone working for the Group understands what is expected of them, Dowlais has adopted 'Our Code', which sets out the standards and behaviours expected of all Group employees and workers, whatever their job and wherever they are located, without exception. It's there to guide how they must behave, do their jobs and interact with other employees and stakeholders.

Our Code makes it clear that Dowlais expects all Group employees and representatives to behave with the highest ethical standards and to conduct themselves in a way which reflects Dowlais' values.

Our Code can be accessed [here](#).

#### ***Human Rights Policy***

The Group's Human Rights Policy sets out the Group's approach to respecting human rights. It is the Group's policy to ensure that human rights are respected in the way the Group runs its business and through its processes, behaviours, operations and conduct. The policy sets out, amongst other things, the principles of the Group's approach to Slavery & Human Trafficking.

The Group's Human Rights Policy can be accessed [here](#).

#### ***Anti-Slavery & Human Trafficking Policy***

In furtherance of the principles set out in the Group's Human Rights Policy, Dowlais has adopted an Anti-Slavery & Human Trafficking Policy. This policy sets out the Group's requirements on preventing Slavery & Human Trafficking in its businesses and supply chains. The policy provides that Business Units are not permitted to work with suppliers who are unwilling to comply with the Group's zero-tolerance approach and must monitor their suppliers for any suspected incidents of Slavery & Human Trafficking.

The Group's Anti-Slavery & Human Trafficking Policy can be accessed [here](#).

#### ***Conflict Minerals Policy***

The Group's Conflict Minerals Policy sets out the Group's policy to adopt procedures, to the extent required by applicable laws or customer expectations, to seek to identify whether any supplied minerals used in our products constitute or contains Conflict Minerals (as defined under the policy).

Where it is identified that any material being 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.

The Group's Conflict Mineral Policy can be accessed [here](#).

### ***Supplier Code of Conduct***

Dowlais has adopted a Supplier Code of Conduct, which applies globally to the Group's suppliers and sets out what the Group expects of its suppliers, regardless of any conflicting local business practices or social customs. The Group expects its suppliers to operate business in a way which respects human rights, dignity and fundamental freedoms, and the Supplier Code of Conduct contains an express requirement not to engage in any form of Slavery & Human Trafficking. The Supplier Code of Conduct also contains audit rights which entitle the Group to audit its suppliers to verify compliance.

The Group's Supplier Code of Conduct can be accessed [here](#).

### ***Whistleblowing Policy***

All employees across the Group are responsible for the detection and reporting of actual or suspected Slavery & Human Trafficking in any part of the Group's businesses or its supply chains.

Dowlais encourages its employees to Speak Up when they identify issues of concern, including related to suspected Slavery & Human Trafficking. The Group's Whistleblowing Policy is intended to ensure that all employees and third parties with whom the Group deals feel confident that they can raise matters of concern, without being subjected to harassment, victimisation or any other detriment or retaliation.

Where employees do not feel able to report concerns to their manager or someone else within the Group, they are able to report via a confidential and anonymous whistleblowing hotline which is available to all employees across the Group. The hotline is operated by an independent external service provider, which allows employees to speak in confidence to someone who is neither their line manager nor another employee. The external provider reports all employee disclosures to the Group's legal & compliance functions, who investigate calls to the hotline independently from management. The hotline is a free-phone telephone number, which is widely publicised at all Group sites and via Business Unit intranet sites.

Our whistleblowing hotline is also available to third parties with a connection to the Group, including our suppliers. This provides third parties with an alternative and accessible method of communication with the Group to raise any concerns they may have.

## 4 SLAVERY & HUMAN TRAFFICKING RISK ASSESSMENT & MANAGEMENT

The Board of Dowlais has ultimate accountability for managing the risk of Slavery & Human Trafficking, supported by the Sustainability, Legal, Human Resources and Procurement functions who have day to day responsibility for this risk.

The Group applies a risk-based approach to identifying modern slavery risks within its own operations and supply chains. In 2024 and 2025, this included working with external experts to assess inherent country risk, workforce characteristics and relevant people data across our operations. We also reviewed supplier types, geographic exposure and key upstream commodity supply chains.

Relevant policies and procedures were reviewed alongside their implementation across the business and direct suppliers to ensure that the identified risks are being adequately managed and to identify any areas for future improvement.

In 2025, with the support of an external expert, the Group reviewed leading peer practices. This review identified opportunities to strengthen supply-chain mapping, risk-based due diligence, management systems and engagement in industry initiatives.

Five pilot areas were identified where the Group has the greatest leverage and potential impact: agency labour, gender discrimination, scrap-metal supply chains within own operations, 3TG due diligence, and supply-chain health and safety. Strategies have been developed to address risks across these areas. These will be deployed on a phased basis when appropriate, with one to two pilot projects expected to be prioritised initially. Shared governance and delivery structures have been designed to support efficient and scalable implementation over time.

### ***Own Operations***

We have identified one salient human rights risk which is of relevance to our understanding of the risk of Slavery & Human Trafficking within our operations, which is the potential for forced labour relating to vulnerable agency labour workers in sites located in higher risk areas (Asia and Hungary), particularly those recruited from overseas.

Following this review, the Group has considered the risk of Slavery and Human Trafficking taking place in the Business Units. Taking into account the locations of the operations of the Business Units, the roles being performed (and the skills and qualifications needed to perform those roles) by the Group's employees and workers, the policies adopted by the Group and the Business Units and the assurance processes in place, the recruitment processes adopted by the Group, the limited use of agency workers and the strong relationships we have with the limited number of agencies used in recruitment processes, the access and security controls at its sites and the absence of reports of concerns or incidents regarding forced labour, the Group has concluded that the risk of Slavery and Human Trafficking occurring within its operations is low and the risks are being adequately managed.

## ***Our supply chain***

We have identified one following salient human rights risk which is of relevance to our understanding of the risk of Slavery & Human Trafficking within our supply chain, which is forced labour risk, largely relating to the extended tin, tantalum, tungsten and gold (3TG) supply chain (in the Democratic Republic of Congo) which is particularly relevant to mechatronic products we manufacture and scrap metal (in India, Brazil and China).

The Group has considered the risk of Slavery and Human Trafficking taking place in the Business Units' supply chains during the year. We continue to apply our existing due diligence processes to our direct suppliers. As further noted in section 5 below, our visibility beyond our direct supply chain is limited. While there is an expectation that all our suppliers adhere to our Supplier Code of Conduct and there is an absence of reports of concerns, there are systemic risks which have been identified above and therefore we plan to undertake further work over the coming year to understand how we can assure and address systemic modern slavery risks throughout our supply chain.

## **5 DUE DILIGENCE & ASSURANCE**

Dowlais understands the importance of thorough due diligence, which helps protect workers in our supply chains from exploitation and ensure that survivors of Slavery and Human Trafficking are provided with the support they need to begin rebuilding their lives.

### ***Within the Group's Business Units***

Dowlais and its Business Units follow standard recruitment procedures and make use of reputable employment and temporary labour agencies in sourcing its labour. The Group conducts due diligence on any new agency and also conducts checks on its employees as part of the onboarding process, including ensuring the Group's employees have the right to work in the country in which they are located.

### ***Within the Group's supply chains***

All Business Units are required to undertake due diligence on their suppliers when they are first engaged. The due diligence process is intended to mitigate a range of risks, including the risk of Slavery & Human Trafficking in the Group's supply chain, and includes reputational checks, ownership and denied parties and media screening checks. This process helps assist in identifying any suppliers that are known or suspected of engaging in Slavery and Human Trafficking. Both Business Units conduct risk assessments based on the nature of the procured goods or services. In all cases, where issues of concern are identified, more extensive due diligence is undertaken.

The Group and the Business Units are undertaking meaningful actions to prevent and remediate actual or potential risks of modern slavery. The Group recognises that it faces challenges with transparency across each tier of its supply chain. Whilst the Group focuses its efforts on conducting due diligence on the Group's direct suppliers, it also mandates that these suppliers conduct due diligence on their own supply chain. In 2025, the Group worked with an external provider, to assess its current due diligence processes against best practice and has identified areas for improvement.

### ***Leadership assurance***

The Group expects all leaders within the Group to take responsibility for combatting Slavery & Human Trafficking, and engages in an annual leadership assurance process, with a detailed discussion on Human Rights and Responsible Sourcing at its Group Sustainability Committee meeting, at least once a year, to ensure they understand their responsibilities and are confident that the policies and procedures within their area of responsibility are adequate.

## **6 TRAINING & AWARENESS**

The Group's Business Units provide targeted and regular training to employees on the Group's policies, including in relation to Our Code, the Group's Human Rights Policy, Anti-Slavery & Human Trafficking Policy and Whistleblowing Policy.

Dowlais, GKN Automotive and GKN Powder Metallurgy each also have a bespoke online training programme on ethical conduct, which includes specific training on identifying Slavery & Human Trafficking in the Group's business and supply chains. The training aligns with and supplements Our Code and must be completed every two years. Both businesses also provide additional relevant and specific training to employees working in procurement, supply chain, sourcing and human resource teams.

Business Units continue to take actions to raise employees' awareness of the Group's whistleblowing platform, using online and offline media as appropriate. It is a requirement of the Group's Whistleblowing Policy that all of the Group's sites display posters which promote the details of the applicable phone numbers, web address and QR codes to communicate whistleblowing concerns.

Whistleblowing cases are regularly reviewed by Business Unit and Group Executive Teams and by the Audit Committee and the Board of Dowlais. During 2025, there were no reported concerns regarding Slavery and Human Trafficking across the Group's operations or supply chain. The Executive Teams, Audit Committee and Board of Dowlais will continue to monitor the nature of issues reported through the Group's whistleblowing hotline. The integrity of this process is an important part of the Group's risk management in this area, and the Audit Committee and Board of Dowlais will continue to review this each year to ensure its ongoing effectiveness.

## **7 KEY PERFORMANCE INDICATORS**

The Group continues to monitor and evaluate the effectiveness of the steps that it is taking to ensure that Slavery and Human Trafficking is not taking place within the Group or its supply chains by:

- monitoring any reports that may indicate that Slavery & Human Trafficking practices or the risk of potential Slavery & Human Trafficking practices have been identified;
- monitoring the findings of any internal investigations in this area; and
- monitoring training completion records.

## **8 OUTLOOK FOR 2026**

Following its expected combination with American Axle and Manufacturing Inc. in 2026, the Group expects to build on the work undertaken in recent years to further strengthen its approach to human rights in response to identified risk themes. This will include the continued development of proportionate and effective due-diligence processes, appropriate to the scale and complexity of the new organisation, to mitigate the risks of modern slavery and human trafficking.

In addition, the Group will continue to:

- continue to provide ongoing support to all Business Units in reviewing and investing in their operations and procedures to ensure that risks of Slavery & Human Trafficking are considered and addressed;

- continue to review and improve its supplier due diligence and risk assessment processes; and
- continue to educate and promote a speaking up culture within the Group and its supply chain, encouraging everyone to raise concerns.

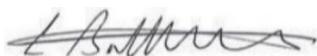
## **9 SECTION 54 OF THE MODERN SLAVERY ACT 2015**

This statement is made on behalf of Dowlais Group plc in accordance with the Modern Slavery Act 2015.

This statement applies to Dowlais Group plc and all of its Group companies, which include those within GKN Automotive and GKN Powder Metallurgy. A full list of Dowlais' subsidiaries as at 31 December 2025 will be made available in the Notes to the Company Balance Sheet within the Group's 2025 Annual Report.

## **10 APPROVAL**

The Board of Dowlais Group plc approved this statement on 28 January 2026, and it is signed on its behalf by:



**Liam Butterworth**  
**Chief Executive Officer**  
**Dowlais Group plc**

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