

DOWLAIS

SUPPLIER CODE OF CONDUCT

Dowlais Group plc

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I N T R O D U C T I O N

At Dowlais, we always seek to operate to the highest ethical, environmental, social and governance standards and we expect the same of our suppliers.

This means that, in addition to providing the highest quality products or services, it is essential that you also operate your business in a way that supports our commitment to sustainability and high standards of business conduct.

This Supplier Code of Conduct applies globally to all suppliers to Dowlais and sets out what we expect of you in practice. We require that you and all our suppliers comply with this Code, regardless of any conflicting local business practices or social customs.

If you have any questions about this Supplier Code of Conduct or about what is expected of you as a Dowlais supplier, please speak to your regular Dowlais contact or contact us on compliance@dowlais.com

WHAT WE EXPECT FROM YOU

As a supplier to Dowlais, you will at all times:

Ethical Standards

- Maintain high standards of integrity, honesty, professionalism and fair-dealing.
- Not commit any act which may adversely impact Dowlais' interests, reputation or good standing.
- Conduct your business in an open and ethical manner.
- Comply with all applicable anti bribery and corruption laws.
- Never engage in any practice which is, or might be perceived to be corrupt or fraudulent.
- Neither pay nor accept (nor tolerate anyone else paying or accepting) any bribes, 'kickbacks' or other similar payments or inducements. This includes 'facilitation payments' made to facilitate or speed up official or governmental procedures.
- Not engage in or facilitate financial crime, including money laundering or tax evasion.

Human Rights

- Operate your business in a way which respects human rights, dignity and fundamental freedoms.
- Not use child labour or any form of forced, bonded or involuntary labour, or engage or participate in any way in slavery or human trafficking.
- Not ask your employees or workers to pay recruitment fees. Not confiscate, destroy, conceal, and/or deny access to workers' passports or other identity documents. Not engage in activities intended to restrict worker freedom of movement.
- Ensure that all work is conducted on a voluntary basis and employees are free to terminate their employment by giving notice in accordance with the terms of their employment.
- Comply with all applicable labour laws and regulations, and internationally accepted standards of workers' rights. Provide employees and workers with clean toilet facilities, potable water, and sanitary eating facilities.

Your Employees and Workers

- Within the laws, customs and practices of the countries in which you operate, not unreasonably or unlawfully discriminate against any employee or worker, nor engage in actual or threatened physical abuse or discipline, sexual or other harassment, or verbal abuse or intimidation.
 - Comply with your obligations to your employees and workers relating to wages and benefits, working hours, freedom of association and collective bargaining.
 - Operate your business in a way which encourages your employees and workers to raise any concerns about ethical or legal conduct, without fear of retaliation. Provide grievance and whistleblowing mechanisms that are accessible to your employees and workers.
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Our Employees and Workers

- Avoid engaging with Dowlais employees in a way which results in, or may be perceived to result in, an inappropriate conflict of interest for them. A conflict of interest can arise when the personal interests of a Dowlais employee are inconsistent with the responsibilities of his or her position.
 - Respect Dowlais' position on gifts and hospitality. We prefer that you do not give Dowlais employees gifts or gratuities. Dowlais operates a corporate hospitality policy and Dowlais employees may be required to decline gifts, gratuities or offers of hospitality which may be perceived as a bribe or inducement. Dowlais employees are never allowed to request gifts and under no circumstances should you feel obliged to offer gifts or gratuities to a Dowlais employee.
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Health and Safety

- Comply with all applicable health and safety laws and regulations. Provide a safe, clean and hygienic workplace for your employees and visitors (including Dowlais employees). Where your employees are at a Dowlais premises, ensure they operate and behave in an acceptable and safe manner, without presenting an undue risk to themselves, Dowlais' employees or representatives, or others.
 - Properly identify and assess all hazards and risks associated with the use of your products or services, and ensure that adequate safeguards and working practices are in place to reduce or eliminate them.
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Environment and Sustainability

- Conduct your business in a way which safeguards the natural environment. You will comply with all applicable environmental laws and regulations, including those relating to regulated chemicals and substances, obtain and comply with all necessary environmental permits and properly dispose of all hazardous and regulated substances.
 - Pro-actively work to improve your environmental performance and operate in a more sustainable manner, including taking steps to improve energy efficiency; reducing water consumption; utilising renewable energy; and reducing or eliminating greenhouse gas emissions, air and water pollution and waste.
 - Measure your carbon footprint in line with international best practice and set targets to reduce your scope 1, 2 and 3 carbon emissions to help achieve a net-zero global economy by 2050.
 - Work to ensure your products and/or services are contributing towards the de-carbonisation of the automotive industry.
 - Where you supply products, adopt circular economy principles when designing and supplying those products to reduce the amount of resources required and waste produced in manufacturing, supplying and using those products.
 - Engage in sustainable and ethical sourcing practices, including only purchasing from ethically responsible sub-suppliers, sourcing raw materials from conflict-free regions, and conducting the due diligence necessary to ensure you meet these requirements.
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Legal Compliance

- Conduct your business in accordance with all laws and regulations of the countries in which you operate and to which you are subject, including those relating to data privacy and data protection.
 - Comply with all applicable trade compliance regimes, such as export and import controls, embargoes and sanctions.
 - Comply with all applicable anti-trust and competition laws. You must not fix prices or rig bids with your competitors, allocate customers or markets, or exchange current, recent or future pricing information with or between them.
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Social Responsibility

- Operate with high standards of social responsibility.
 - Demonstrate your commitment to creating a positive impact on society and the communities in which you operate.
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Information Security

- Respect the integrity of any information we provide to you and only use it for the purposes for which it is provided.
 - Comply with our Supplier Information Security Requirements, a copy of which is available at www.dowlais.com/SupplierInformationSecurityRequirements.
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Observing this Code

- Have appropriate policies and procedures in place to enable you to fully comply with this Code. These need not be identical to this Code, but as a minimum, they must be consistent with its principles.
 - Provide Dowlais with any information we reasonably request to demonstrate your compliance with this Code and certify your compliance on request. This includes responding to all sustainability questionnaires, or engaging in all sustainability assessments, which we may from time to time request.
 - Inform Dowlais if you become aware of any actual or potential breach of this Code, whether by you or any other person or company.
 - Reflect the principles of this Code in your own supply chain. Only purchase from sub-suppliers who operate in a way which is consistent with the principles of this Code.
 - Allow Dowlais employees and third party representatives to visit your premises and/or access your records and/or personnel on reasonable notice to audit and ensure compliance with this Code.
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WHAT WE EXPECT FROM OURSELVES

We recognise that acting ethically, responsibly and sustainably is a two-way process. We expect high standards of you and we expect the same of ourselves. If you become aware of any conduct by Dowlais, or any of our employees or representatives, which you believe may not meet our high standards of business conduct, please immediately inform us by e-mail to compliance@dowlais.com. Suppliers who bring matters of concern to our attention will be not face any adverse consequences for doing so.