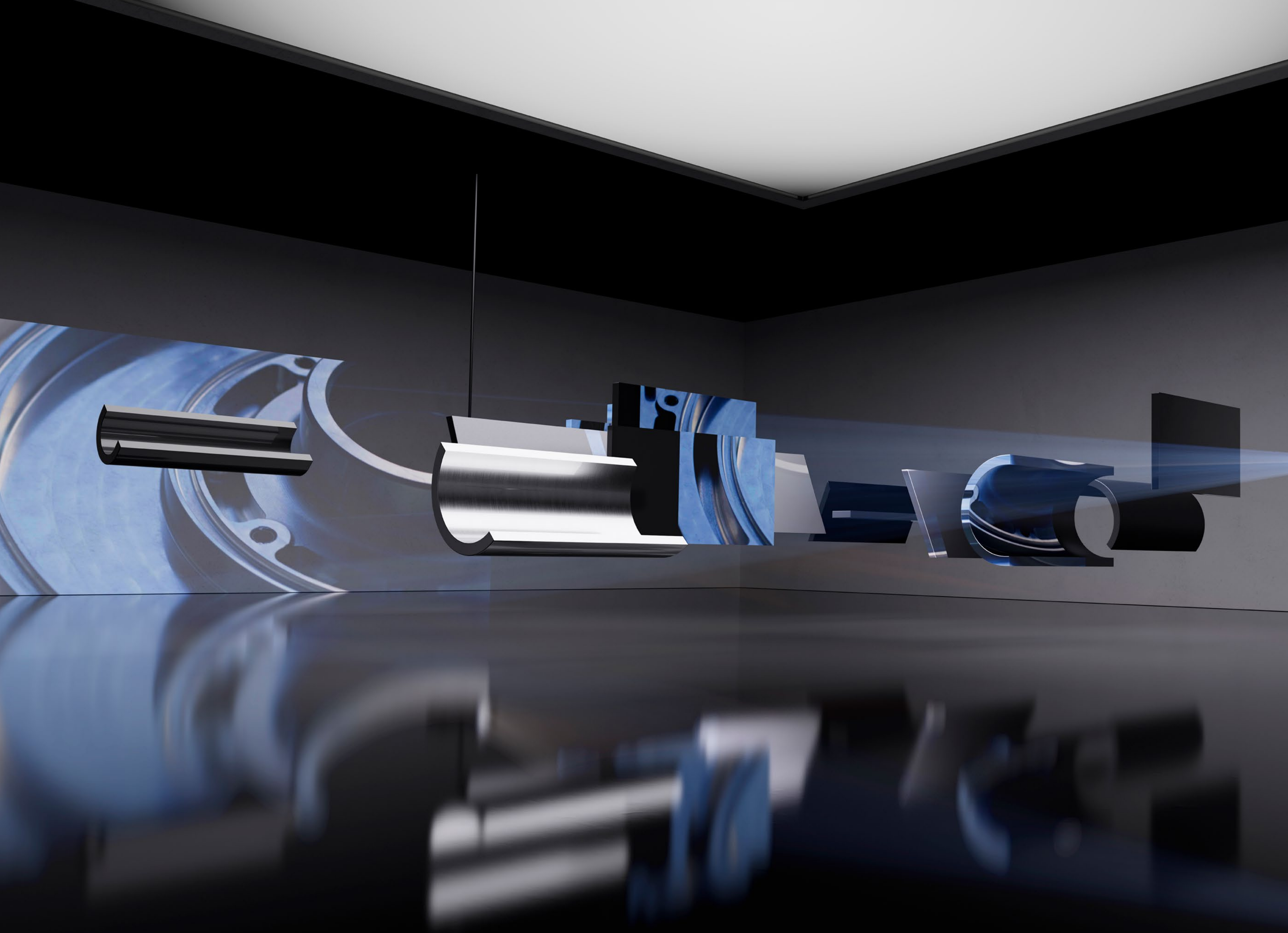


DOMLAIS

Our values define who we are,
collectively as a business and individually
as employees

OUR CODE





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WELCOME TO OUR CODE



Dear Colleague,

As an employee of the Dowlais Group, you are part of a team of people from all across the world, working hard to make our business better, stronger and more sustainable.

To succeed, we must work together, with a common goal but also with common values. Our values are to be Agile, Ambitious and Accountable.

Being Accountable, means being responsible for your actions, but it also means acting responsibly. This includes doing the right thing, whatever the circumstances.

I want us to grow our business and increase profits, but not at any cost. Some things are more important. This includes respecting and protecting each other and our business, behaving ethically and lawfully and caring for our communities and our world. These things are non-negotiable and must inform how we act every day.

Please read Our Code carefully. I expect you to understand it and to comply with it. Be honest, fair, and trustworthy in all of your actions and if you are ever in doubt, seek help. You have colleagues and leaders who will guide and support you.

Being part of the Dowlais Group is a privilege, but it also comes with responsibilities. Like me, you represent our Group. You are responsible for your own actions, but also for helping create a culture in which behaviour which is inconsistent with Our Code is not tolerated.

So if you discover behaviour that could be wrong or inconsistent with this Code, please Speak Up so we can deal with it. I know I can count on you to comply with Our Code, to be Accountable and to always do the right thing.

Thank you,

Liam Butterworth
Chief Executive Officer

INTRODUCTION

Respect and protect each other and our business

Behave ethically and lawfully

Care for our communities and our world

Our Code

At Dowlais, being Accountable means being responsible for your actions, but it also means acting responsibly. Our Code focusses on how we:

- Respect and protect each other and our business
- Behave ethically and lawfully
- Care for our communities and our world

Our Code is important. It should guide how you behave, how you do your job and how you interact with other Dowlais employees and stakeholders. It applies to all Dowlais employees and workers, whatever their job and wherever they are located, without exception. It sets out the minimum standards we expect of everybody.

Our Code explains things that you must and must not do. But it is only an overview of the most important issues. It cannot cover every topic, situation or requirement in detail. Where relevant it directs you to our more detailed policies and procedures which contain more information.

If you do not understand any part of Our Code or the standards expected of you as a Dowlais employee, ask your manager, or a member of your HR or Legal functions.

Speaking up

However hard we try to do the right thing, sometimes things do go wrong. When they do, it is important that you bring this to our attention so that we can deal with it and prevent it from happening again. We therefore encourage a culture of Speaking Up in which we ask that you bring all issues of concern to our attention.

You should always feel able to ask questions or raise concerns about any acts or behaviours which are or could be inconsistent with Our Code. Your concerns will be listened to, investigated and dealt with properly and sensitively.

For more information please see our Whistleblowing Policy. We will always support employees who raise genuine concerns, even if they turn out to be mistaken.

If you have a question or concern, your first point of contact should be your line manager, or if appropriate another manager or specialist at your location.

If for any reason you feel you cannot raise the matter internally, a confidential and anonymous Employee Disclosure Hotline and Portal is available to report issues of concern. This is open 24 hours a day, seven days a week, and is hosted by an external, independent company. Telephone numbers are widely publicised in your place of work and are available at www.dowlais.com/speakingup

01

**We respect and
protect each other and
our business**

Health and Safety

The health and safety of our employees is our number one priority. We are committed to providing a safe working environment for our people and supporting their mental health.

You are a key part of this. Our health and safety systems are integrated into every Dowlais facility and office, and should be embedded in how every employee thinks and behaves.

What this means for you:

- Comply with our Health and Safety Policy and all other relevant Health and Safety policies and procedures at your location
- Understand the safety requirements of your role, and seek support from an HSE specialist, if necessary
- Recognise that how you behave at work contributes to the safety of yourself and your colleagues
- Actively support all safety initiatives at your location and help identify and deliver safety improvements
- Complete your required health and safety training
- Follow standard work processes
- Never work under the influence of alcohol or drugs
- Speak Up when you see something wrong.

Respecting each other

We believe in treating other people with respect. We expect Dowlais to be a great place to work, where no one is bullied, harassed or disrespected.

We expect these behaviours at all levels of our organisation, regardless of seniority or role. We encourage robust and frank discussion, but it must never cross a line where it becomes disrespectful.

What this means for you:

- Treat your fellow colleagues and other people with dignity and respect
- Never bully, harass or victimise another person, or behave in a threatening or intimidating manner
- Never engage in conduct which could constitute sexual harassment, including unwelcome physical contact, expressions, gestures or comments
- Not make or share material, jokes or comments, or spread gossip or rumours, which others might find offensive
- Be sensitive to cultural differences, where your conduct may be acceptable in one culture but not another
- Be tolerant and understanding when people do make genuine mistakes.





Diversity, Equity and Inclusion

Dowlais businesses operate globally and we believe in recognising and celebrating the different cultures, customs and beliefs of our employees, within a common framework of respect and tolerance.

We value differences and recognise that the diversity of our people, cultures, skills and abilities is a business strength. We do not tolerate unlawful or unethical discrimination in any form.

We believe in rewarding performance. We will ensure that opportunities for development and progression within our business reflect the talent and experience of our employees.

What this means for you:

- Never discriminate on the grounds of gender, sexual orientation, age, disability, religion, race or national or ethnic origin, or for any other reason which is unethical or unlawful
- Ensure all decisions relating to employment, development and promotion are based on ability and merit
- Promote and value diversity and inclusion in the workplace
- Recognise that you may have unconscious biases and take steps to address them.

Accounts and Records

We are committed to high standards of accuracy and integrity in our business records and financial reporting.

Our investors place trust in our accounts and financial records, and accurate record-keeping and reporting reflects on our reputation and credibility, and ensures that we meet our legal and regulatory obligations.

What this means for you:

- Record all business and commercial transactions properly and accurately, in accordance with our policies
- Do not manipulate the recording of revenue, expenses, accruals or provisions to meet budgetary or bonus goals
- Never falsify any document or distort the true nature of any transaction
- Ensure that all tax, regulatory and other public filings are true and accurate to the best of your belief and are submitted when due
- Always be open and honest in dealing with our auditors and relevant authorities
- Maintain all records in accordance with our Document Retention Policy
- Comply with the procedures required by our Anti-Money Laundering Policy and Anti-Facilitation of Tax Evasion Policy and not engage in conduct that could unknowingly facilitate money-laundering or tax evasion
- Speak Up when you see something wrong.

Business Resources

As Dowlais employees, we are custodians of the resources and assets of our business. This includes things like money, inventory, equipment and tooling, but also information, data, technology and intellectual property.

We use these resources every day, but they do not belong to us. They belong to Dowlais. So we must look after them and use them properly.

What this means for you:

- Only use Dowlais resources and assets for valid business purposes
- Do not seek to misuse them for your personal benefit or any other non-business purpose
- Keep them safe and secure and exercise the same degree of care as if they were your own.

Security

Effective and reliable security is critical for the protection of our people and our business. Our customers and suppliers trust us to protect their assets and to treat them with the utmost care.

We are committed to keeping our people, business assets and information secure, but cyber security attacks and other security threats continue to increase.

Physical security breaches could put our people and assets at risk. Information security breaches could result in disruption to our IT and manufacturing systems; financial loss from theft, fraud or ransom; breach of our obligations to our customers and suppliers; and reputational damage. This means that the security of our business must be an integral element of our daily work. Every Dowlais employee must play their part to protect us all against security threats and risks.

What this means for you:

- Comply with our Security Policies and related procedures
- Classify and categorise all information assets you create and then handle them in accordance with those classifications
- Complete all security training when requested
- Immediately report any security concerns or issues. Even if you are not sure, it is better to report.



02

**We behave
ethically
and lawfully**

Our Legal Obligations

As Dowlais businesses operate globally, we are subject to thousands of laws and regulations which apply in the countries in which we are based or operate. It is Dowlais policy to always comply with the laws and regulations to which we are subject.

Many of the laws which affect our business are considered in other parts of this Code, but we cannot explain every law here. Whilst we do not expect you to be a legal expert, we do expect you to always be careful to make sure you comply with the law and if you are ever unsure to seek help from your Legal Function.

What this means for you:

- Familiarise yourself with the basics of the laws that apply in your country, or to your role
- Undertake all legal and compliance training whenever you are requested
- If something feels like it may be unlawful, stop and think
- If you are ever in doubt, seek advice your Legal Function.

Bribery and Corruption

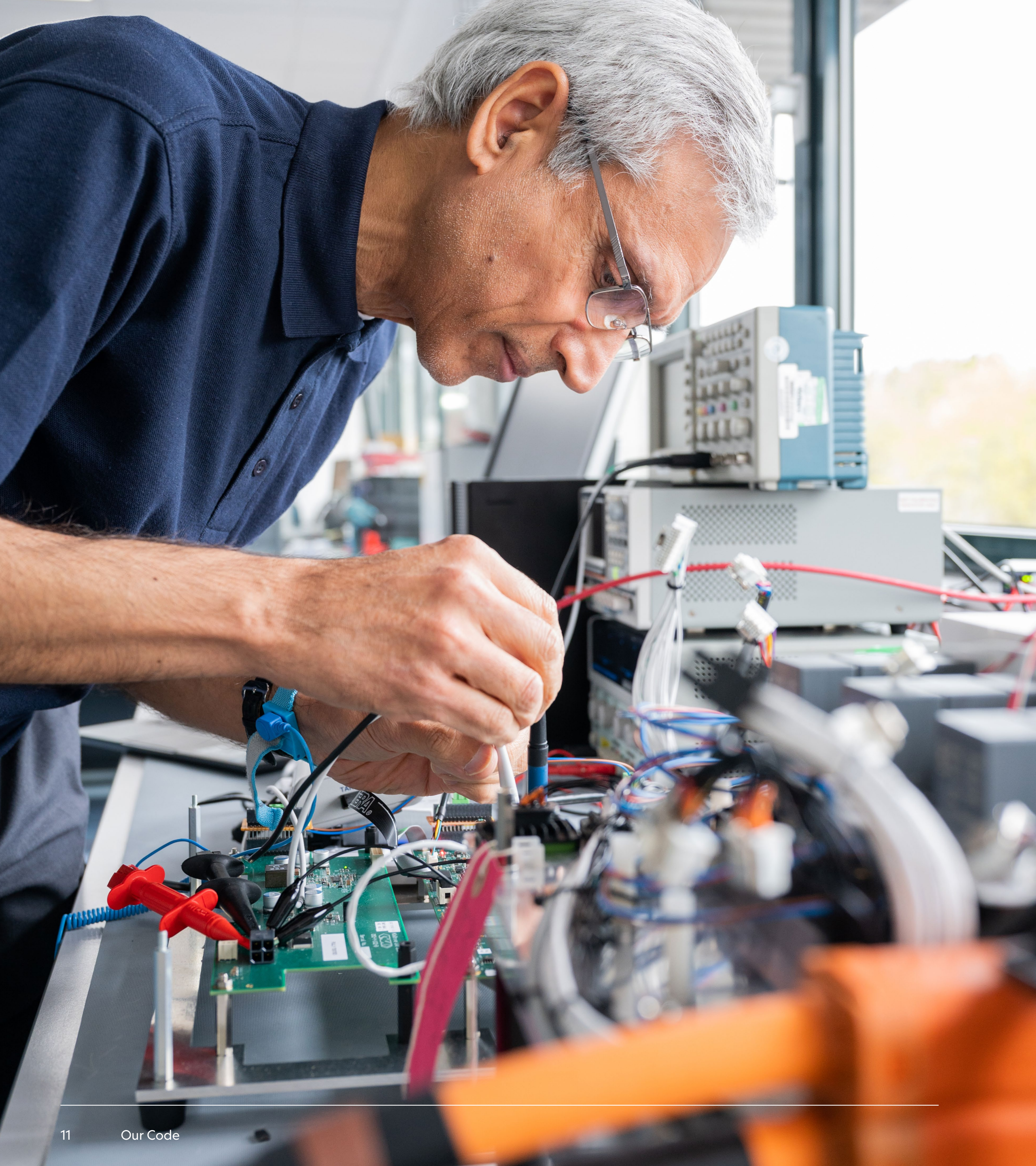
Bribery is illegal, and corruption is damaging to businesses, people and societies. We have a policy of zero tolerance toward bribery and corruption in our business and our supply chains.

Anti-bribery laws are strict, and can make us liable for bribes paid by others on our behalf, even without our knowledge. Our anti-bribery policies and procedures are designed to protect us and must always be followed.

What this means for you:

- Comply with our Anti-Bribery and Corruptions Policy
- Do not offer or pay bribes to anyone – including ‘facilitation payments’
- Do not accept bribes or anything that may look like a bribe
- Declare all gifts and hospitality given or received in accordance with our policies
- Do not make political donations and ensure other donations comply with relevant polices
- Report any known or suspected bribery by Speaking Up.





Competing Fairly

Competition and antitrust laws apply in all the countries in which Dowlais businesses operate. We must compete hard, but fairly and within the restrictions of the law.

Illegal anti-competitive behaviour has been a major problem in the automotive and other industries and many other companies have been prosecuted for breaching the rules. We must never become one of them.

What this means for you:

- Be very careful when interacting with competitors
- Never share competitively sensitive information with a competitor
- Never agree or reach an understanding with a competitor to fix prices, to allocate customers, territories or markets, to collude on tenders or rig bids, or otherwise not to compete in any way
- Complete all training on this topic when requested
- Comply with our Competition and Antitrust Law Policy
- If you have any doubts about what you are doing, seek advice from your Legal Function.

Trade Compliance

Dowlais businesses operate globally. Our people, products and technology cross borders and we interact with business partners in many countries and territories. This brings with it requirements to comply with global trade restrictions, including sanctions which prohibit business with some countries, companies and individuals.

We must also comply with customs and other import and export formalities, and we may also be subject to technology related trade controls.

Finally, we need to understand our potential business partners. This includes doing checks to make sure they are reputable and we are safe to deal with them.

What this means for you:

- Comply with our Trade Compliance Policy, including seeking approval before dealing with counterparties in relevant countries.
- Comply with our procedures when dealing with a new customer, supplier or other business partner
- Ensure all customs forms and declarations are completed and filed in an accurately and timely manner.

Personal Data and Privacy

Dowlais and our businesses collect, store and use personal data relating to thousands of people, including our employees, customers, and suppliers. Holding and processing that personal data comes with increasingly strict legal responsibilities.

We must use, store and dispose of that data carefully, in a way that respects individual privacy, and is compliant with relevant laws in all the countries in which we operate.

What this means for you:

- Only collect, use and retain personal data for legitimate business purposes
- Comply with our Data Protection Policy which explains how you use, process and dispose of that data
- Complete all training on Data Protection and Privacy when required
- Seek advice from your local Data Protection Coordinator or your Legal Function when you are unsure.

Ethical Conduct

Laws and regulations set out the minimum standards which we must meet, both as a business and as individuals.

But complying with laws is not enough. We expect you to go further, and always behave with the highest ethical standards and to conduct yourself in a way which reflects Dowlais' values.

What this means for you:

- Being honest and transparent
- Conducting yourself professionally
- Acting with integrity
- Being trustworthy and keeping your promises and commitments
- When you make mistakes, being open and not covering them up
- Honouring the spirit as well as the letter of Our Code.





Conflicts of Interest

Conflicts of interest can arise when our personal relationships or financial interests (or those of our family or friends) overlap with the responsibilities of our role with Dowlais.

Conflicts of interest can impact the decisions we make, erode trust and harm our reputation. Even the appearance of a conflict can be damaging. Potential conflicts of interest could include appointing or referring work to a supplier in which you are personally interested; hiring a family member or someone you are in a close personal relationship with; or having any material interest in any Dowlais customer or competitor.

You must therefore always:

- Try to avoid situations which might create a conflict between your interests and those of Dowlais and our businesses
- Where an actual or potential conflict does arise, declare it and seek approval in accordance with our Conflicts of Interest Policy
- Comply with laws relating to dealing in shares or securities, and never deal on the basis of non-public price sensitive information or in breach of our Securities Dealing policies
- Speak Up, if you see something wrong.

What if I am not sure what to do?

Laws are complex and judgements about what is ethical can sometimes be difficult.

If you ever have any doubt about what you are doing, stop and think. Ask yourself, does this feel right? Is it consistent with Our Code?

If not, seek help, from your manager, another senior leader, or from your Legal Function. If in doubt, always ask.

03

**We care for our
communities and
our world**

Protecting our Environment

At Dowlais, we want to protect our environment for the benefit of future generations.

This means not only complying with environmental, performance, both in how we operate our production facilities and offices and in the way we design and manufacture our products.

We are committed to reducing energy, water and waste, and to minimising our greenhouse gas emissions.

What this means for you:

- Comply with our Environmental Policy
- Actively support all environmental initiatives at your place of work
- Understand the environmental requirements of your role and location
- Seek support from your HSE team if you need to
- Speak Up when you see something wrong.

Product Safety and Quality

Product safety is critical in the industries we operate. Every day, millions of people rely on our technology and products to keep them safe.

We must follow the product safety laws where we do business, our customers' safety requirements, industry safety requirements and the requirements of our policies. We are absolutely committed to delivering products which not only meet our customer's quality expectations, but which we know are safe.

What this means for you:

- Comply with our product safety policy and procedures
- Complete all-employee Product Safety training and other job specific product safety training
- Recognise that how you behave at work contributes to the safety of our products
- Report potential product safety concerns to your product safety representative
- Speak Up if you see something wrong.





Supporting Communities

We are committed to making a positive contribution to the communities in which we operate. There are lots of ways in which we do this.

We promote good business practice, create opportunities for employment and are sensitive to the concerns of the communities and societies we interact with.

We also support charities and community organisations, and provide opportunities for employees to volunteer and fundraise.

You can support this by:

- Helping us support projects and activities in our local communities and encouraging others to do the same
- Putting forward ideas for how we can help
- Seeking to minimise any negative impact we might have on the communities in which we operate
- Communicating the good work that you do outside your role to support charities and your community.

Human Rights and Modern Slavery

We are committed to respecting fundamental human rights in our operations, our value chain, and in the communities in which we operate.

We seek to avoid complicity in human rights abuses and to use our influence to promote the fulfilment of human rights. This includes our commitment to combat modern slavery in all its forms and in ensuring that Dowlais and our suppliers and business partners do not use, or tolerate the use of, any child labour or any form of forced, bonded or involuntary labour.

What this means for you:

- Comply with our Human Rights Policy, and our Anti-Slavery Policy and Human Trafficking Policy
- Speak Up if you see someone being treated in a way which might suggest some form of modern slavery, so that we can investigate it further
- Ensure our commitment to combatting modern slavery is clearly communicated to our business partners, including through our Supplier Code of Conduct
- Comply with due diligence procedures and refuse to deal with any party which is of concern
- Undertake all training that is requested of you.

Customer and Supplier Relationships

Our customers and suppliers are critical to our business and we believe in building strong, committed and value-creating relationships with them.

Although we will not always agree on everything, we believe in treating our customers and suppliers respectfully, fairly and with integrity. We also expect our customers and suppliers to demonstrate the same standards of business conduct as we do.

What this means for you:

- Behave in a way that encourages the development of long-lasting relationships, built on trust
- Treat our customers and suppliers with the respect and courtesy we would expect ourselves
- See ourselves through the eyes of our customers
- Ensure that the terms of our agreements with customers and suppliers are clear, whilst adequately protecting our interests
- Regularly monitor the performance of our suppliers and ensure that they are acting in accordance with our standards, including our Supplier Code of Conduct.

Communication

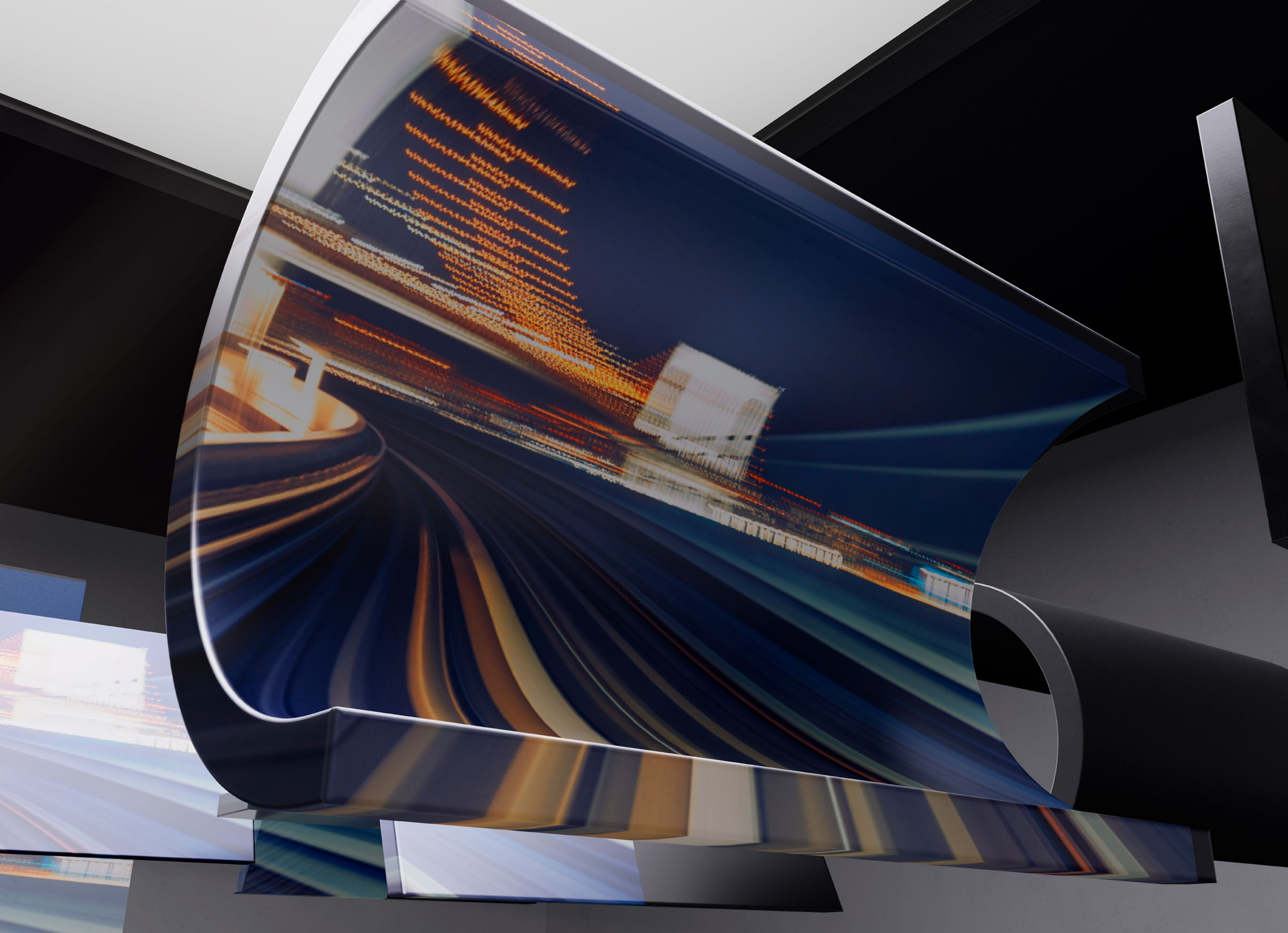
Clear, open and honest communication is essential to building trust with our employees, customers, suppliers, investors, the media, the public and the communities in which we operate.

All Dowlais communications should be clear, accurate and communicated in a way that demonstrates our values and preserves our reputation.

What this means for you:

- Follow all relevant communication policies
- Always act in a way that reflects our values and protects or enhances our reputation and brand
- Do not make public comments or statements on behalf of Dowlais unless approved by our Communications Function, and avoid situations where your personal comments could be interpreted as a comment or endorsement made by Dowlais
- When communicating, make sure you are clear, factually correct and cannot be misinterpreted
- Always assume that written communications may one day be made public, so be careful with the words you use
- Don't say something in public that you would not want to be repeated
- Use social media carefully and in accordance with all relevant policies.





Further Reading

- [Anti-Bribery and Corruption Policy](#)
- [Anti-Facilitation of Tax Evasion Policy](#)
- [Anti-Money Laundering Policy](#)
- [Biodiversity Policy](#)
- [Charitable Donations Policy](#)
- [Communication Policy](#)
- [Competition and Antitrust Policy](#)
- [Conflict Minerals Policy](#)
- [Conflict of Interest Policy](#)
- [Data Protection Policy](#)
- [Diversity Equity & Inclusion Policy](#)
- [Document Retention Policy](#)
- [Energy Policy](#)
- [Environmental Policy](#)
- [Human Rights Policy](#)
- [Modern Slavery Policy](#)
- [Product Safety Policy](#)
- [Responsible Sourcing Policy](#)
- [Group Wide Securities Dealing Policy](#)
- [Social Media Policy](#)
- [Trade Compliance Policy](#)
- [Water Policy](#)
- [Whistleblowing Policy](#)

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