

First publication: February 2022
Version: 1
Document type: Policy
Scope: Global



DONCASTERS

GLOBAL MODERN SLAVERY & HUMAN TRAFFICKING POLICY

POLICY NAME
Global Modern Slavery & Human Trafficking Policy
PURPOSE
This Policy provides guidance on Doncasters zero-tolerance approach towards modern slavery and human trafficking.
OBJECTIVES
The objective of this Policy is to set out the steps which Doncasters' takes to identify, prevent, and end all forms of modern slavery and other human rights abuses in our business and our supply chains.
As outlined in our Code of Conduct, Doncasters complies with local laws in every country where it operates.
AUDIENCE
The policy applies to all companies within the Doncasters Group, including all operating companies under the operational control of Alloy Topco Limited.
In the following document, a Doncasters Group entity is referred to as "Doncasters" or "the Company" interchangeably.
Doncasters is committed to ensuring that its stakeholders, including but not limited to its suppliers, consultants, and advisors, uphold the principles set out in this policy and adopt similar policies within their operations.
INCLUDED IN THIS POLICY IS
<ol style="list-style-type: none"> 1. Definitions 2. Commitments 3. Reporting Mechanism 4. Confidentiality & Protection Against Retaliation
CONFIDENTIALITY STATUS
Public
LOCAL ADAPTATION AUTHORISATION
This Policy is a global minimum standard. Language only changes.
DOCUMENT OWNER
Legal, Compliance & Risk

DOCUMENT REVIEWER
Executive
DOCUMENT APPROVER
Board of Directors
INTRODUCTION
<p><i>“We believe that everyone, everywhere has the right to live their life free from slavery and abuse”</i></p> <p style="text-align: right;"><i>Mike Quinn, CEO</i></p>
<p>Doncasters is committed to respecting and promoting the highest standards of ethical behaviour in line with our Code of Conduct and our Values.</p> <p>Modern slavery is an international crime and a breach of fundamental human rights. The Company strictly prohibits the use of modern slavery and human trafficking in its business activities and supply chains.</p> <p>Doncasters is committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within the Company or its supply chains. The Company expects that its suppliers will hold their own suppliers to the same high standards.</p>

DEFINITIONS	
Employee	'Employee' shall mean and include any person on the active payroll of the Company including managers and workers, those on deputation, contract, temporary, part-time, apprentices, trainees or working as consultants.
Modern Slavery	A term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking.
Human Trafficking	Where a person arranges or facilitates the travel of another person, with a view to that person being exploited.
COMMITMENTS	
<p>The Company expects that everyone working with us or on our behalf supports and upholds the following measures to safeguard against modern slavery:</p> <ul style="list-style-type: none"> • We have a zero-tolerance approach to modern slavery in our organisation and our supply chains. • The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Employees must not engage in, facilitate, or fail to report any activity that might lead to, or suggest, a breach of this Policy. • We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain. • We keep our contracting processes under review and assess whether the circumstances require the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. • If we find that other individuals or organisations working on our behalf have breached this Policy, we will ensure that we take appropriate action. 	
Awareness and Training	
<p>We are committed to building our business around strong ethical values and all employees who join Doncasters are made aware of the Company's Code of Conduct, and this Policy.</p>	
Effective Monitoring	
<p>The Company will continue to monitor the effectiveness of this Policy within its supply chain, for existing and new suppliers, and update it as necessary.</p>	

Any person who believes that they have witnessed a breach of this Policy, or who becomes aware of conduct that may breach this Policy, should immediately report it through the complaint mechanism of the Company.

An Employee who knew about the breach but took no action to report it may also be subject to disciplinary sanctions, up to and including termination.

REPORTING MECHANISMS

Reporting to Management

If an employee has any concerns related to their direct activities or the Company's supply chains, they should bring it to the attention of their manager.

Reporting to HR

If the Employee does not feel comfortable raising the issue to their manager, either because of an existing or potential conflict of interest or because of the fear of retaliation, they should report the matter to their Human Resources representative.

Reporting to the General Counsel & Chief Risk Officer

If an Employee does not feel comfortable raising the issue to their line manager, either because of an existing or potential conflict of interest or because of the fear of retaliation, they can report the matter to the General Counsel & Chief Risk Officer.

Other stakeholders can also report issues and concerns directly with the General Counsel and Chief Risk Officer, who can be contacted via hbarrett-hague@doncasters.com

Report through Speak Up

Employees can also report breaches of this Policy via the Speak Up service.

The Speak Up service is run by a company called Navex and is an external, independent reporting service designed for employees and others to report anonymously any breach of Law, our Code of Conduct, Corporate Values and related policies or directives, including this one while complying with local regulations.

Details of the contact details can be found in our Code of Conduct, on posters around each site, on the Employee App and on SharePoint.

REPORT ONLINE

www.doncasters.ethicspoint.com

REPORT BY PHONE

From the UK:

Call: 0800 890 011

(when prompted, dial: 833 537 0829)

From the USA:

Call: 833-537-0829

From Germany:

Call: 0800 225 5288

(when prompted, dial: 833 537 0829)

From India:

Call: 000 800 050 3406

From Mexico:

For outside calls, dial your local access code followed by 800-288-2872.

Por Cobrar Spanish: 800-112-2020

(when prompted, dial: 833 537 0829)

From China:

For an outside line, dial the direct access number for your location:

China (Southern): 10-811

China (Northern): 108-888

(when prompted, dial: 833 537 0829))

CONFIDENTIALITY & PROTECTION AGAINST RETALIATION

Doncasters strictly prohibits retaliation against anyone who, in good faith, reports violations of this Policy or participates in an investigation, even if the investigation does not ultimately prove the concerns. Dishonest, bad faith, or otherwise abusive reports (such as false personal attacks aimed at specific individuals) are prohibited and may result in disciplinary action.