



HUMAN RIGHTS AND MODERN SLAVERY POLICY

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HUMAN RIGHTS AND MODERN SLAVERY POLICY

JDR respects and supports the dignity, wellbeing and human rights of our employees, the communities in which we live and those who might be affected by our operations. We are committed to respecting internationally recognised human rights in line with the principles and guidance contained in the UN Guiding Principles on Business and Human Rights. We respect all internationally recognised human rights as relevant to our operations, including those set out in the International Bill of Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work and OECD Guidelines for Multinational Enterprises. We recognise that while states have a duty to protect human rights, companies have a responsibility to respect human rights, and this means acting with due diligence to avoid infringing on the rights of others and addressing the adverse impacts of our global operations.

This policy sets out the principles with respect to human rights and modern slavery and how we relate this to our employees, contractors, suppliers and partners, as well as communities affected by our business activities. This policy sits alongside our Modern Slavery Statement, HSEQ Policy and relevant employee facing policies including but not limited to our Ethics Policy, Recruitment and Training and Development Policies. .

We see salient issues as where we could do people most harm in both our own operations and our extended supply chain. We manage human rights by understanding our greatest human rights risks, conducting due diligence, acting on our findings, integrating the responses to our due diligence into our policies and internal systems, tracking our actions, and communicating with our stakeholders about how we address impacts.

We will:

- Seek to avoid causing or contributing to adverse human rights impacts through our own activities and address such impacts, if they do occur, in a timely and appropriate manner.
- Seek to prevent or mitigate adverse human rights impacts that are directly related to our operations, products and services through our business relationships.
- Provide for or cooperate in their remediation through legitimate processes, if we identify that we have caused or contributed to adverse human rights impacts.

- Continue to look for ways to support the promotion of human rights within our operations and our sphere of influence.

We require all our employees and hired contractors to comply with this policy and will seek to provide ongoing training and tools to support this.

Modern slavery is both a crime and a violation of fundamental human rights. JDR is committed to the elimination of all forms of modern slavery and to the international effort to abolish child labour. JDR takes a zero-tolerance approach to such activities and seeks to identify and address such risks in our facilities, operations and throughout our wider supply chains. JDR publishes an Annual Statement on Modern Slavery that outlines our activities, performance and actions taken during the year.

JDR is committed to supporting our clients in their efforts to address modern slavery and child labour in their operations and supply chains.

We also recognise the critical role our suppliers play in helping us to source responsibly and sustainably. Our Responsible Sourcing Code sets out our expectations with regards to the respect for human rights. They are based on commitment to respecting all ILO core labour standards and in particular provide further details on:

- Treating those working for us and those impacted by our operations fairly and without discrimination
- Providing safe, healthy and secure working conditions
- Opposing all forms of human trafficking, modern slavery, forced labour and illicit forms of child labour in our value chain
- Respecting the human rights of people in communities impacted by our activities including, but not limited to, the right to property, livelihood and the use of land and natural resources, security, health, and the right to water and sanitation

We will only work with suppliers who implement our Responsible Sourcing Code. They must agree to ensure transparency, to remedy any shortcomings, and to drive continuous improvement. Our Responsible Sourcing Code contains clear requirements and guidance on grievance mechanisms.

Our principle is that where national law and international human rights standards differ, we will follow the higher standard; where they are in conflict, we will adhere to national law, while seeking ways to respect international human rights to the greatest extent possible.

We recognise the importance of dialogue with our employees, workers and external stakeholders who are or could potentially be affected by our actions. We pay particular attention to individuals or groups who may be at greater risk of negative human rights impacts due to their vulnerability or marginalisation and recognise that women and men may face different risks.

As part of this commitment JDR does not tolerate threats, intimidation, physical or legal attacks against human rights defenders, including those exercising their rights to freedom of expression, association, peaceful assembly and protest against our global operations and our Responsible Sourcing Code expects our suppliers to make the same public commitment.

Grievances

We place importance on the provision of effective remedy wherever human rights impacts occur within our operations, including our supply chain, through JDR's grievance mechanisms.

If you believe that a conflict has arisen between the language of the policy and the laws, customs and practices of the place where you work, if you have questions about this policy or if you would like to report a potential violation of this policy, you should raise those questions and concerns in confidence through JDR's internal or external grievance processes.

The Executive Management Team review and approve this policy annually and it is signed on behalf of the business by the Chief Strategy & Compliance Officer.

James Young
Chief Strategy & Compliance Officer
December 2023