respects and supports the dignity, wellbeing and human rights of our employees, the communities in which we live and those 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, this means acting with due diligence to avoid infringing on the rights of others and addressing the adverse impacts of our global operations.

**Implementation**

This policy sets out the principles for how we relate to our employees, contractors, suppliers and partners, as well as communities affected by our business activities.

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

We 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, 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.

JDR is developing policies and processes in place to identify, prevent or mitigate human rights risks, and remediate any adverse impact our global operations have caused or contributed to. 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 grievance processes.

Tomasz Nowak, Chief Executive Officer
March 2021

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

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