



## Providing the Vital Connection

### MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement highlights the steps that JDR Cable Systems Limited (JDR) have taken to ensure that modern slavery and human trafficking is not taking place within the companies in the JDR Group or any of our supply chains.

### ORGANISATIONAL STRUCTURE

At JDR our primary business is the design, engineering, manufacture and services for subsea power cables, production control umbilicals, intervention workover control systems and end termination and accessories used in the global offshore energy industry. We conduct business internationally and have facilities and offices in Littleport, Newcastle and Hartlepool in the United Kingdom and Houston, Texas. We are focused on our responsibilities to our people, customers, suppliers and the wider JDR community. We believe our reputation, together with the trust and confidence of those with whom we deal, is one of our most valuable assets. This is reflected in our work and the policies by which we abide. We strictly condemn any form of slavery and human trafficking and are committed to further improving our policy and processes to combat such abject practices.

### OUR SUPPLY CHAIN

JDR has a zero tolerance approach to any form of slavery or human trafficking, whether within our business or our supply chain.

We are committed to making sure that, as far as we are able, there is no modern slavery or human trafficking in our supply chains or in any part of our business. This commitment reflects our dedication to acting with integrity in all our business relationships at all times and to implementing and enforcing effective systems and controls to ensure that slavery and human trafficking is not taking place in our supply chains. To ensure a consistent approach to our procurement and the performance of the necessary due diligence we have developed a Responsible Sourcing Code that details what JDR expect from our Supply Chain, and clearly sets out JDRs approach to human rights and modern slavery. We have embedded a modern slavery assessment section as part of our Responsible Sourcing Code process and this is used when appointing new suppliers. JDR routinely assess our existing supply chain for compliance in line with the Modern Slavery Act in order to ensure that our commitment to comply with the requirements of the Modern Slavery Act 2015 is shared and cascaded to our suppliers. We require all of our suppliers and subcontractors, irrespective of size, to adhere to the Responsible Sourcing Code and our policies.

### OUR POLICIES

**JDR Ethics Policy** – The JDR Ethics policy applies to all JDR employees, Executive Management team, Board of Directors, and effectively anyone representing or acting on behalf of our for JDR. It denounces all forms of human rights abuse and exploitation of any kind. It is available to all our employees on our intranet and is accessible on our public website.

**Responsible Sourcing Code** – This document outlines the minimum ethical and sustainable business practices that we expect from our suppliers and subcontractors. It sets our expectation that they will carry out their

business with their own suppliers and subcontractors in accordance with the standards and principles included in the Responsible Sourcing Code and JDR Ethics Policy. Whilst JDR will always seek to procure component and materials at competitive rates, we will not do so at the expense of labour or human rights standards.

**Speak Up Policy** – We do not tolerate misconduct and in light of this we have developed our Speak Up Frequently Asked Questions (FAQ's) that outline how to report concerns and how those concerns will be investigated and brought to resolution. This is available to all employees on our intranet and is on our public website. JDR staff are provided with access to a confidential 'whistle-blowing' hotline, which can be used by any individual to report any concerns anonymously.

## **DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

As part of our initiative to identify and mitigate the risk of slavery and human trafficking in our supply chains, we:

- have embedded a modern slavery assessment section as part of our supplier selection process when appointing new suppliers.
- have reviewed and amended the agreement we enter into with our supply chains that require suppliers to comply with applicable laws.
- routinely assess our existing supply chain for compliance with the Modern Slavery Act in order to ensure that our commitment to comply with the requirements of the Modern Slavery Act 2015 is shared with our suppliers;
- continue to ensure that our recruitment processes are rigorous, transparent and regularly reviewed. We have robust procedures in place for vetting new employees, confirming their identities and ensure we pay them directly into their personal bank accounts;
- continue to monitor potential risk areas;
- positioned our whistleblowing policy and Speak Up FAQs to encourage employees and external

parties to identify and report any suspicions with regard to malpractice, illegal or unethical practices in the organisation and within our supply chain.

## **TRAINING AND AWARENESS**

JDR consider human rights compliance to be critical to our organisational success. As an international organisation, we understand that the responsibility to address potential human rights concerns lies with a broad base of employees across the company. As such, we ensure that all new employees are provided with copies of our current policies and briefed on their importance. In addition, all new and updated policies are rolled out to all employees for review and consideration, with our employees required to acknowledge receipt and understanding of the policies.

## **ASSESSING AND MANAGING RISK THROUGHOUT 2020**

2020 and the onset of the COVID-19 pandemic has caused disruption worldwide and has led to unprecedented challenges, with elevated safety control measures influencing work within our factory and office environments, the ability to travel, product availability and lead times across most businesses globally. We recognise that the impacts of COVID-19 have increased the pressure on people who are vulnerable and to those who are potentially exposed to the risk of exploitative practices. JDR acknowledges that we must remain especially vigilant in these times when assessing the impacts and potential impacts of the pandemic and investigate thoroughly, taking action as and where required.

Whilst COVID-19 has dominated 2020 and has presented fewer opportunities to concentrate on the development of our Modern Slavery and Human Rights program we have made progress with the investigations and development of our Responsible Sourcing Code processes.

As a consequence of the measures we have taken in 2020, and in particular following the launch of our

Supplier Declaration, we have not been made aware or discovered any incidents of modern slavery or human rights abuses within our organisation or throughout our supply-chain. JDR are not complacent and will continue our vigilance as we progress throughout 2021.

### **KEY PERFORMANCE INDICATORS**

Whilst we recognise that it is difficult to quantify outcomes and impacts of tackling modern slavery, over time we will be able to enhance our measurement and assessment, and be able to demonstrate the impact of our actions through the implementation of Key Performance Indicators (KPIs).

### **NEXT STEPS**

During 2021, JDR are working towards improving the structure and relevance of our policies. We have already updated our Ethics Policies and introduced the Responsible Sourcing Code process. We will be introducing an updated Human Rights Policy. All of which will form a mandatory part of supplier and subcontract compliance programme. The roll-out of these updated controls will take place from the first half of 2021.

We are committed to continuing to review and update all our policies and procedures wherever necessary during the forthcoming financial year to identify and mitigate risk, to expand and further develop appropriate and proportionate amendment to our existing monitoring procedures. We will also continue to work with our supply chains to ensure, as far as we are able, that their processes and policies are in line with our commitment to comply with the requirements of the Modern Slavery Act 2015. Should there be an occurrence of non-compliance, either in our business or supply chain it will be assessed on a case by case basis and appropriate action will be taken.

During 2021 we will develop our KPI reporting metrics to enable us to demonstrate the outcomes of all of our assessments. This will enable us to target any high risk areas of our business, or segments, sourcing routes within our supply chain.

This statement has been approved by the Board of JDR Cable Systems Limited and is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes JDR's Modern Slavery and Human Trafficking Statement for the financial year commencing 1st January 2020 and ending 31st December 2020. The policy will be reviewed and updated annually.



Chief Strategy & Compliance Officer: James Young

Date: 16<sup>th</sup> August 2021