

GRIEVANCE FRAMEWORK

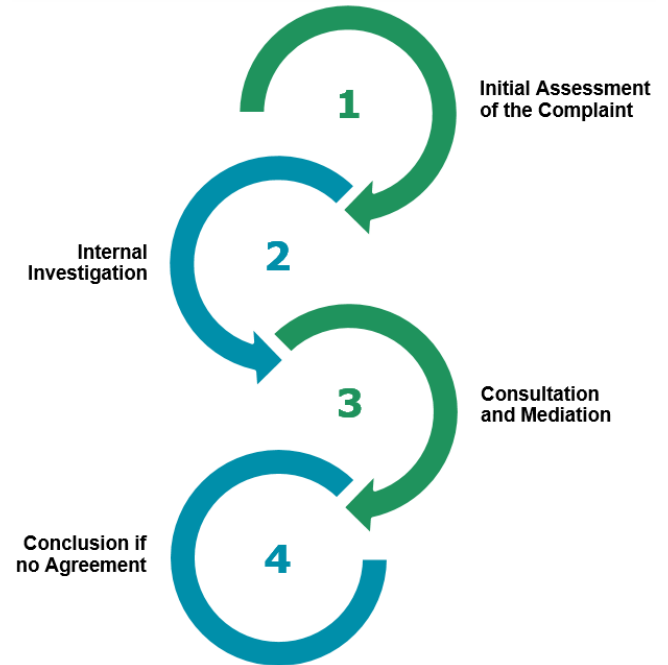
EXTERNAL GRIEVANCE POLICY

The employees of JDR Cable Systems Ltd (JDR) are covered by an internal Grievance Policy and Procedure and all our suppliers are covered by our Responsible Sourcing Code which require them to have their own effective grievance mechanisms in place, and we encourage the use of these as a first resort to settle complaints.

JDR recognises that a formal grievance procedure can be stressful for all those involved. Workers and their representatives are ideally placed to raise any issues with management and potentially solve a dispute informally as it is occurring. In our experience, localised solutions tend to be most attuned to local culture, the concerns of those whose rights are impacted, and opportunities for sustainable solutions.

Should this not be possible then this policy allows for a more formal approach to be taken. We recognise external investigations of complaints by brand companies or multi-stakeholder initiatives are an important and necessary back-stop to individual site processes, but should be used after all local complaint mechanisms have been exhausted.

Often the issues raised are complex. This means it takes time to investigate and check facts, and in some cases, there is no clear-cut right or wrong answers. In other instances, complaints cannot be addressed by JDR in isolation, as they may require wider engagement with industry and other stakeholders.



WHAT WOULD CONSTITUTE A COMPLAINT UNDER THE JDR EXTERNAL GRIEVANCE POLICY?

A complaint is a report of a violation against our Responsible Sourcing Code, Code of Ethics or Human Rights Policy that has occurred in JDR’s supplier network.

The complaint should be evidence based. This means that the complainant should be able to provide sufficient information to demonstrate the relevance and seriousness of the complaint. After all local and site based remediation and complaint mechanisms have been exhausted, an individual or organisation can make a complaint so long as they are directly affected by the issue. If they are a representative organisation, they must have a mandate to represent individuals or communities who are directly affected and have access

to first-hand knowledge of the circumstances giving rise to the complaint.

HOW DO COMPLAINTS GET RAISED?

At JDR, any serious concern should be voiced with trust. All issues raised are treated with utmost importance and confidence. As a non-JDR worker wanting to report a concern or complaint within their organisation or an affiliated organisation, you can:

1. Raise the concern or complaint via our Grievance Report Form, or
2. Contact the Compliance Officer at JDR by email, or in writing

Email address: jdrcompliance.officer@jdr cables.com

Postal Address: Compliance Officer
JDR Cable Systems Ltd.
177 Wisbech Road
Littleport
Cambridgeshire
CB6 1RA
United Kingdom

The complaint can be submitted in the individual's or organisation's own language. We endeavour to acknowledge receipt of all emails received into this mailbox within two (2) working days, or five (5) working days if in a language other than English.

The OECD National Contact Points mechanism can be used in instances where individuals or organisations feel they cannot raise a complaint with us directly.

INVESTIGATING AND UNDERSTANDING COMPLAINTS

Once a complaint has been reported, a unique case number is generated which allows for confidential dialogue to take place between the parties (e.g. should there be any further questions to ask). This includes situations where the party wishes to remain anonymous. It also enables feedback to be provided (e.g. progress status).

All complaints raised are reviewed by JDR's Compliance Officer who will assign the case to a Designated Investigation Officer.

Our goal will always be to assess and then investigate all legitimate complaints and promote their resolution in the quickest possible timeframe.

The complaint will be considered to have been resolved at an initial stage if and when the parties agree on a plan for remedial action to address the issue. Complaints vary in scale, complexity and geographical origin so it is not possible to say how long it will take to reach a resolution. We will, however, always strive to keep all parties regularly informed (in their local language) on the steps that are being taken and the results of the process.

If the party is still dissatisfied with the outcome and the actions taken by JDR, they can refer the issue or complaint to the relevant National Contact Point.

STEP 1: INITIAL ASSESSMENT OF THE COMPLAINT

The first priority is to gather information from all parties in a timely manner, based on a thorough enquiry into the issues. This will enable JDR to establish the legitimacy and scale of the alleged problem.

STEP 2: INTERNAL INVESTIGATION

This step is used to consider the evidence provided and conduct the necessary investigation. Depending on the complaint made, JDR may involve an independent third party.

STEP 3: CONSULTATION AND MEDIATION

Following receipt of information from all parties where appropriate, JDR will seek to promote discussion and dialogue between the relevant parties.

STEP 4: CONCLUSION IF NO AGREEMENT

This step will be taken if the complainant is not satisfied, or if no agreement is forthcoming within a reasonable period of time.

Providing the investigation has been thorough and all available options have been exhausted, JDR's Compliance Officer will give final determination and reserves the right to decide on JDR's actions in relation to the complaint.

In certain issues, which may be outside our influence, we may seek to achieve the following:

- Look to engage on an advocacy, legislative level
- Support greater transparency of the wider systemic cultural issue through relevant stakeholders and reporting
- Where appropriate identify other customers who have similar standards and share information with them in so far as commercial sensitivity and confidentiality allows, in order to build broader leverage and communicate a shared set of expectations

ANTI-RETALIATION

Within our Complaint Framework, our primary concern will always be to safeguard the rights and wellbeing of any person who has raised the complaint. Everyone is entitled to be treated with respect and JDR will not tolerate abusive or insulting behaviour from anyone. Intimidation or harassment of witnesses will not be tolerated.

Retaliation can take many forms:

- Loss of employment
- Demotion
- Involuntary transfer
- Harassment
- Intimidation, etc.

If a person or organisation believes they have been the subject of retaliation because of registering a complaint with JDR directly or via one of our suppliers, they should contact us immediately and provide the specific details of what has occurred. We will investigate and if there is clear evidence of retaliation, we will take action to remedy the situation.

This may require, for example, the issuing of a warning letter to a supplier, if it is found that they have retaliated against a worker, or a worker representative, for disclosing workplace issues; or, it may demand the intervention of government, when a legal or administrative remedy is required.



James Young, Chief Strategy and Compliance Officer

7th October 2021