



## **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 within our supply chain.

### **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.

JDR directly employs circa 500 people and engages with other professional subcontractors, suppliers, agents and clients. We conduct business internationally and have facilities and offices in Littleport, Newcastle and Hartlepool in the United Kingdom and Tomball, Texas in the United States of America.

We are focussed 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.

JDR accepts the principles of fair payment and compliance with international legislation and standards governing working hours, health and safety at work and rejects, in particular:

- Child and enforced labour.
- The deprivation of liberty, inhuman treatment, physical punishment, the threat of violence, collective punishment.
- The curtailment of pay, and any form of bullying or abuse as means of discipline or control.

### **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 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 JDR's 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 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 FAQs 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 provide access to a confidential 'whistle-blowing' hotline, which can be used by any individual to report any concerns anonymously. In addition, JDR has launched an External Grievance Policy that is positioned on our website and provides a framework for external stakeholders to report any concern it may have in relation to JDR or its subcontractor, suppliers, agents, clients or other related partners.

**Human Rights Policy** – This policy applies both within JDR and to all those that JDR do business with. JDR have engaged with a number of key Clients to ensure that our message is compliant with global requirements and is consistent with that delivered within our wider industry.

JDR Modern Slavery Statement – financial year ending December 2021.



JDR are committed to making every appropriate and reasonable effort to continuously implement and apply the values, principles and rules described in our policies and Code of Conduct. In implementing our policies we aim to make it clear to our employees and supply chain that personal and professional integrity are essential to conducting business in an ethical manner, and that all JDR employees and its supply chain are required to apply the principles of our policies.

## **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. 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.

During 2022, we will be working towards rolling out a programme of modern slavery awareness training throughout the organisation, to ensure that all employees are aware of the primary indicators of modern



slavery, and will be a platform to reinforce the methods of making any concerns known. We expect to begin delivering this training during the last quarter of 2022.

## **ASSESSING AND MANAGING RISK THROUGHOUT 2021**

In 2021, the effects of COVID-19 pandemic continued to cause disruption worldwide and new and unprecedented challenges, with impacts on the ability to work within 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 dominated 2021 and presented limited opportunities to visit and meet in person to develop our Modern Slavery and Human Rights programme we have made progress with the investigations, engaged positively with our supply chain and implemented our Responsible Sourcing Code processes.

We have issued a revised Human Rights policy that reinforces the message in our Code of Ethics that JDR does not tolerate any aspects of human trafficking, human rights violations or modern slavery and will only trade with those businesses that foster the same resolve.

During 2021, we have begun to 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, or sourcing routes within our supply chain. Whilst the continuing effects of COVID-19 have impacted on the speed of this development, we are continuing to make efforts to streamline this process to enable accurate and meaningful reporting. As a consequence of the measures we have taken in 2021, 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 into 2022.

## **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 2022, JDR will be working towards improving the structure and relevance of our policies. We have introduced the revised Human Rights Policy and are continuing to review our KPI reporting metrics. Both now form a mandatory part of JDR's supplier and subcontractor compliance programme. We will continue to communicate our expectations to our strategic suppliers to uphold our commitment to combatting slavery and human trafficking.

We are committed to continuing our periodic review and update of all our policies and procedures wherever necessary and during the forthcoming year to identify and mitigate risk, to expand and further develop appropriate and proportionate amendment to our existing monitoring procedures. As the implementation of the our Responsible Sourcing Code matures we will 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.

We will begin to provide a programme of modern slavery awareness training to employees as necessary, and continue to educate our employees on the JDR Code of Ethics along with all other compliance policies, providing regular refresher training and ensuring this is a core part of the induction processes for any new starter at the company

This statement has been approved by the Executive Management Team 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 1<sup>st</sup> January 2021 and ending 31<sup>st</sup> December 2021. The policy will be reviewed and updated annually.

**Signature:**

A handwritten signature in blue ink, appearing to read 'J Young', is written over a light blue horizontal line.

**Name:** James Young

**Title:** Chief Strategy and Compliance Officer

**Date:** 6<sup>th</sup> June 2022