



INTRODUCTION

JDR Cable Systems Ltd. employees are covered by an internal Grievance Policy and Procedure and all our suppliers 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 Cable Systems Ltd. recognises that a formal grievance procedure can be stressful for all those involved. Workers¹ 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 Cable Systems Ltd. in isolation, as they may require wider engagement with industry and other stakeholders.

¹ The term 'worker' is defined under the [Employment Rights Act 1996 230 \(3\)](#) and means an individual who has entered into or works under (or, where the employment has ceased, worked under);

- a) a contract of employment, or
- b) any other contract, whether express or implied and whether oral or in writing, whereby the individual undertakes to do or perform personally any work or services for another party to the contract whose status is not by virtue of the contract that of a client or customer of any profession or business undertaking carried on by the individual

Any reference to a worker's contract shall be construed accordingly.

1 WHAT CONSTITUTES A COMPLAINT

What would constitute a complaint under the 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 Cable Systems Ltd.'s supplier² 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.

2 HOW DO COMPLAINTS GET RAISED?

As a non-JDR Cable Systems Ltd. worker wanting to report a concern or complaint within their organisation or an affiliated organisation, you can:

- Raise them via our [Grievance Report Form](#), or
- Contact JDR Cable Systems Ltd.'s Compliance Officer 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.

² For the purpose of this policy, 'supplier' means suppliers, agents, sub-contractors and joint-venture partners

The OECD³ National Contact Points⁴ mechanism can be used in instances where individuals or organisations feel they cannot raise a complaint with us directly.

2.1 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 Cable Systems Ltd.'s Compliance Officer who will assign the case to a Designated Investigation Officer (DIO).

Our goal will always be to assess and then investigate all legitimate complaints⁵ 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.

3 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 Cable Systems Ltd. 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.

³ The [Organisation for Economic Co-operation and Development](#) is an international organisation that works to build better policies for better lives. Their goal is to shape policies that foster prosperity, equality, opportunity and well-being for all.

⁴ [National Contact Points](#) form part of the OECD's responsible business conduct and sets out an expectation that all businesses address the negative impacts of their operation. This includes procedures designed to enable the resolution of disputes related to the implementation of their guidelines.

⁵ A grievance made that violates JDR Cable Systems Ltd.'s human rights policy, code of ethics, or responsible sourcing code will be treated as a 'legitimate complaint' that will warrant further investigation to confirm legitimacy as per the Complaint Framework.

If a person or organisation believes that they have been subject of retaliation because of registering a complaint with JDR Cable Systems Ltd. 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 against them, 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.

4 COMPLAINT FRAMEWORK

We use a generic framework which is applied depending on the nature of the issue and local circumstances.

The below details our standard process steps with some example questions.



4.1 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 Cable Systems Ltd. to establish the legitimacy and scale of the alleged problem.

Questions that may be applicable:

- Has the complaint occurred in our current supply chain or operations?
- What is the size of our operation where the complaint has occurred?
- How many workers, products, or services are involved?
- How has the community been impacted?
- Is there immediate physical danger?
- How serious is the breach?
- Is the complaint being pursued by other means?
- Is there supporting information or details of where corroborating information can be found?
- Has a formal complaint with the employer been lodged, or a court case been filed?
- Has the issue been raised before?
- What is the preferred solution: what do the complainants want to happen to remedy the situation?
- Are there other organisations that might have useful information directly relevant to the complaint together with their contact details?
- Are there local complexities: for example, ethnic, cultural or political issues that will have a bearing on the alleged violation and how it can be investigated?

4.2 Step 2: Internal Investigation

This step is used to consider the evidence provided and conduct the necessary investigation. Depending on the complaint made, JDR Cable Systems Ltd. may involve an independent 3rd party.

- Assess evidence that confirms that the complaints are founded
- Interview relevant parties
- Identify if the issues were still current, or if effective corrective actions had occurred
- Check if the governance and due diligence processes are effective at identifying these issues
- Understand if all local and site based remediation and complaint mechanisms have been exhausted already. If not, complainant should follow these before invoking this process

4.3 Step 3: Consultation and Mediation

Following receipt of information from all parties where appropriate, JDR Cable Systems Ltd. will seek to promote discussion and dialogue between the relevant parties, using the criteria below:

- Ideally all appropriate parties should meet in person or by teleconference to talk about the issues, rather than communicating by email, to ensure a more successful outcome. This should be conducted as near as possible to the location of the complainant
- All relevant information should be shared, including the prioritisation of the issues, with all parties prior to mediation so all sides are fully briefed
- Ground rules about confidentiality of information and disclosures to the media should be agreed at the start of the mediation process. Encourage all parties to be open-minded and flexible on what constitutes an acceptable outcome to a complaint
- During meditation we try to maintain momentum by identifying the issues on which all parties can agree and to focus the discussion only on the issues where there is disagreement
- Once communication channels are open and a degree of trust established, some issues are best addressed through bilateral dialogue between parties, rather than requiring JDR Cable Systems Ltd.'s involvement
- All parties should be encouraged to put forward practical solutions rather than simply registering complaints or stating their position
- A time period and monitoring plan must be assigned to all corrective actions and other outcomes, including responsibility for monitoring
- In some cases a 3rd party can be used for support with monitoring the implementation of corrective action plans
- If agreement between the parties is reached, conclusion will be achieved when all parties sign a summary statement to confirm what has been actioned and what has been agreed

4.4 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 that 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

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

APPENDIX A – EXTERNAL GRIEVANCE FLOWCHART

