



MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

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**Providing the
Vital Connection**

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.

This, our third modern slavery statement, sets out how we continue to:

- include modern slavery considerations within our global supplier due diligence, and continue to assess supply chain hotspots to ensure that we only engage with businesses who are at least compliant with UK Modern Slavery legislation;
- strengthen and develop our approach to client risk management;

No infringements or violations have been identified this year in our operations or direct supply chain. We will continue to develop and strengthen our due diligence approach in the coming year and are committing to:

- Introducing our employee modern slavery training programme across the entirety of the JDR Group;
- Integrating Modern Slavery principles into our Human Rights Policy to form one policy;
- Continue to extend transparency and due diligence over supply chain hotspot areas including existing centrally managed global suppliers;
- Introducing a general annual confirmation, where all our employees are required to confirm annually that they are familiar and comply with the Human Rights and Ethics Policies.

ORGANISATIONAL STRUCTURE

At JDR, our primary business is the design, engineering, manufacture and services for subsea power cables, production control umbilical's, intervention workover control systems and end termination and accessories used in the global offshore energy industry.

JDR directly employees 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 in Tomball, Texas. We are currently expanding our UK operations and are in the process of constructing a new manufacturing facility in Cambois, near Blyth, with operations commencing in 2024.

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 we 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. For any responses that are deemed unsatisfactory, we will propose improvements to our suppliers and offer support in implementing change. We require all of our suppliers and subcontractors, irrespective of size, to adhere to the Responsible Sourcing Code and our policies. Our Responsible Sourcing Code also acts as a valuable mechanism to allow key suppliers to self-report any instances of modern slavery or human trafficking that may have occurred in their operations or supply chain in the previous year.

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, and is embedded in our culture and sets the tone from the top.

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 accessible via our public website. JDR provide access to a confidential 'whistle-blowing' hotline, which is available to any employee, client, or third party (including suppliers and contractors) who come across bad business conduct or unethical behaviour to report any concerns anonymously.

In addition, JDR has an External Grievance Policy that provides a framework for external stakeholders to report any concerns in relation to JDR or its subcontractor, suppliers, agents, clients or other related partners.

Human Rights Policy – This policy sets out our position in line with internationally recognised human rights principles. 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.

The above policies are hosted on our website and following any changes are internally circulated via digital communications.

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.

JDR remain 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;
- have 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

Our most valuable asset is our people and therefore creating a safe, fair and inclusive working environment is critical. We aim to achieve this objective by ensuring that our employees have access to our values and understand the expected behaviours of our people.

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. Whilst all new and updated policies will continue to be rolled out to all employees for review and consideration, with our employees required to acknowledge receipt and understanding of the policies, during 2023 we are implementing a general annual confirmation programme whereby employees will receive a digital communication containing JDR's Human Rights, Modern Slavery, Speak Up and Ethics policies, and they will be required to confirm that they understand and agree to comply with its contents.

JDR are 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, which will be a platform to reinforce the methods of making any concerns known. We expect to complete the

delivery of this training across the existing workforce during 2023 and will integrate it into our new starter programme this year.

ASSESSING AND MANAGING RISK THROUGHOUT 2022

Whilst the effects of COVID-19 pandemic have lessened, in 2022 we have been faced with several global economic challenges which continue to cause disruption to supply-chains worldwide, job security, increased cost of living as well as product availability and lead times have been concerns across most of the world. We recognise that the impact of financial insecurity has 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.

As the world moves away from the restrictions of COVID-19, we have made been able to make greater progress with our supply chain investigations and have had more opportunities to engage positively and in person with our supply chain to develop and implement our Responsible Sourcing Code processes.

During 2022, we continued 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 in the period to come. 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 2022, we have not been made aware of 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 2023.

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 2023, JDR will be working towards improving the structure and relevance of our policies. We continue to review our KPI reporting metrics. JDR's supplier and subcontractor compliance programme is a cornerstone of our company values; we will continue to actively engage with our supply chain to ensure that our expectations to uphold our commitment to combatting slavery and human trafficking are met throughout our supply chain.

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 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 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 2022 and ending 31st December 2022. The policy will be reviewed and updated annually.



James Young
Chief Strategy and Compliance Officer
30th May 2023