



ETHICS POLICY

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**Providing the
Vital Connection**

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1. Introduction

At JDR, our aim is to conduct business with the highest standard of ethical behaviour and in line with our core values. Our values help to define what we stand for. We require all our people to consider our values along with the principles of our code and keep asking, “Is what I’m doing consistent with what we stand for?”

JDR’s vision of how we conduct our business is to:

- Develop and work in world class facilities where we innovate, adapt and embrace change to supply products and services that we are all proud of .
- Work together within a safe, communicative and transparent organisation.
- Invest in our team to encourage personal responsibility, development, leadership and equality.
- To be an integral part of our customers’ project success.

Our values underpin our vision and these values we visualise and communicate throughout our businesses as follows:



In keeping with our values we will:

- Always do what is right
- Always deal fairly and honestly with others
- Work together
- Strive to improve and exceed expectations
- Appreciate and respect others and care about the wider community

This policy document sets out our code of ethics and explains how we work and the behaviour we expect from everyone who works for us and does business with us.

This code and its supporting policies applies to everyone working for and with JDR including full time and part time employees, temporary staff and those who conduct business on our behalf. We are also committed to only working with third parties whose standards are consistent with our own. This includes customers, contractors, suppliers, partners and agents.

The consequences of not complying with this code can be very serious, including significant fines, penalties and even criminal liability for individuals or the company. Any failure to comply with this code or its supporting policies will be investigated and could result in disciplinary action including dismissal.

2. How to Raise a Concern

If you have a serious concern that something may not be consistent with our code or any of our policies then it is important that you speak up. We all have a duty to help maintain our high standards and doing the right thing may mean reporting any wrongdoings.

All issues raised will be treated seriously and in confidence and we will follow them up and wherever possible report back to you.

Some minor issues are best dealt with by talking directly to the person whose conduct is causing concern. If this is not possible then you should talk to your manager or supervisor. If that is not appropriate, you can also get in touch with your Human Resources representative.

If you do not feel comfortable raising your concern through any of these channels, you can contact our confidential reporting line called “Speak Up”, which will allow you to report your concerns free of charge and in confidence. The reporting line is operated by an external independent third party called Navex Global. You can contact the line in three ways:

- Call the telephone number below and talk to a trained operator,
- Call the telephone number and leave a message if you do not wish to talk to anyone,
- Make a report via the Navex Global website.

You do not have to leave your name and can remain anonymous if you prefer. You can call any of the following numbers, free of charge and in complete confidence, any time of the day or night.

If you are calling from the UK, the number is **0800 086 9274**

If you are calling from the USA, the number is **1 844 960 0585**

You can also make a report via the website: www.jdrcables.ethicspoint.com.

If you feel you need to take advice before speaking up, you can. The independent charity Protect (formerly known as “Public Concern at Work”) has an advice line 0203 117 2520, which provides confidential and independent advice to workers who are unsure about raising a concern. For further information on using the “Speak Up” confidential reporting line, please refer to the SpeakUp FAQ.

If you speak up in good faith, believing your information is accurate, you are protected under the Public Interest Disclosure Act 1998, even if you are wrong. However, making a malicious allegation is a serious offence and we will take action against anyone who does so.

3. Personal and Business Integrity

We want to be known for our transparency, honesty and integrity. We will not tolerate corruption and dishonesty in any form.

3.1. Fraud and Dishonest Behaviour

We will not defraud or deceive anyone or act dishonestly, and we will protect the company against fraud.

You will never

- falsify expenses or claim from the company for expenses that have not been properly incurred for carrying out JDR business
- create false or misleading business records
- use JDR money or resources for an improper purpose
- ignore something that you suspect might involve fraud or deception
- make false and fraudulent claims

Further details and information is contained in the JDR Travel & Expenses Policy.

3.2. Bribery and Corruption

We refuse to offer, give or receive bribes or improper payments or participate in any kind of corrupt activity either directly or through any third party.

Facilitation payments are usually small payments made to public officials in order to speed up, or facilitate, actions the officials are duty bound to make. We make no distinction between facilitation payments and bribes and we will not make facilitation payments in any countries in which we do business. We will not allow others who work with us to make them

Further details can be found in the JDR Anti-Bribery & Corruption policy.

3.3. Relationships with Agents and Other Third Parties Acting on Our Behalf

We will only use agents or third party representatives if we have to and if they are known to act to standards consistent with our code. We always follow the approved process to engage them.

We never:

- permit anyone to offer or make bribes or make facilitation payments on our behalf
- pay any money to an agent unless a binding written agreement is in place and we know exactly what the payment is for.

Further details can be found in the JDR Anti-Bribery & Corruption policy.

3.4. Gifts and Hospitality

JDR aims to ensure that any business decisions taken are made solely through the proper business channels and are not driven by any form of personal improper advantage or conflict of interest.

We will ensure that gifts or hospitality at work are reasonable and we never offer or accept them if it may improperly influence a business decision or impair independence or judgement.

Further details can be found in the JDR Gifts & Hospitality policy

3.5. Conflicts of Interest

Conflicts of interest can distort judgement and therefore we will never enter into situations where our personal interests or actions could conflict or appear to conflict with JDR's best interests.

You must never:

- use your position, contacts or any knowledge gained at JDR for personal gain
- pay a third party more than a contractually agreed market-based fee for goods or services
- accept gifts and hospitality that could impair your judgement
- enter into a contract or purchase goods or services for JDR from any supplier where you have a personal interest (or those of a family member or relative) without notifying your manager in writing and abstaining from the decision-making process. (Holdings of less than 1% in a publicly quoted company are excluded).
- use a relationship at work (spouse, family etc.) to influence decisions in your favour.

3.6. Money Laundering

Money laundering is the processing of criminal proceeds in order to disguise their illegal origin. We conduct business with reputable partners and will never enter into any arrangement where we may be involved with money laundering.

You need to be cautious with the way payments are made to identify if irregularities may exist. Any payment received in cash in excess of £1,000 must be reported to the JDR Financial Controller.

3.7. Open and Fair Competition

Countries around the world have developed competition or anti-trust laws. They prohibit business practices that restrict free and fair competition such as bid-rigging, price-fixing or market-sharing. Severe civil and criminal sanctions can be imposed on the company and individuals if competition laws and anti-trust laws are broken.

We believe in open and fair competition and will only seek competitive advantage through fair and lawful means. You need to take care when dealing with competitors as any kind of agreement can raise competition concerns.

You must never:

- participate in any agreement with competitors that have the intent or effect of fixing prices or distorting a bidding process.
- exchange sensitive information (such as pricing) with competitors in infringement of the competition laws.

You must report any suspicions or allegations of possible anti-competitive behaviour to your line manager or any director of JDR.

If any member of the JDR team is asked to participate in any industry working group or trade federation wherein competitors, customers or supply-chain members are present then it is

incumbent on the individual to ensure a competition law checklist is used at all meetings and that the chair of the group, federation or association makes such statements at all meetings. An individual should leave such meetings, and have the minutes noted as such, if they believe any discussion contravenes anti-competition law.

3.8. Import, Export and Trade Controls

We will comply with all recognised boycotts and sanctions and all legal requirements for the proper import and export of goods and technology. We always ensure that we advise our trading partners of their obligations in respect of import, export and Trade controls that may affect our business with them.

Boycotts and sanctions are both forms of trade restrictions. A boycott is where a country refuses to do business with another (or others) and prohibits others from doing so. Sanctions (which include embargoes) seek either to limit or prevent trade with or inside specific countries.

US law imposes further restrictions that are not necessarily approved by recognised international organisations. They seek to prohibit people and organisations from working in certain countries specified by the US Government. US members of JDR and US citizens employed by JDR must comply with these laws. Sanctions for breaching them can include barring JDR from engaging in US trade, very heavy fines and imprisonment of individuals.

As well as complying with all local laws, we must obtain all necessary licences to import and export goods and services and provide accurate truthful information to custom officials.

4. OUR WORKING RELATIONSHIPS

We will work together to create an environment in which everyone feels valued and there is equal opportunity for all. We will behave towards each other with integrity, honesty, courtesy, consideration, respect and dignity. We are committed to helping our people achieve their best.

4.1. Equality and Diversity

We treat everyone equally and embrace difference. JDR has an Equality and Diversity policy to ensure that all employees get equal treatment and respect and that the criteria for employment and promotion are the same for everybody. The opportunity for advancement is based only on objective considerations such as performance, ability and aptitude.

4.2. Harassment, Bullying and Discrimination

Harassment and bullying refers to any action or behaviour that any individual or group finds unwelcome, humiliating, threatening, violent, hostile or discriminatory. Employees should be particularly sensitive to actions that may be acceptable in one culture but are not in another.

Discrimination means treating a certain person or group based on factors such as age, race, religion, national or ethnic origin, sexual orientation, marital status, disability unrelated to the task in hand, union membership or political affiliation.

We are committed to creating a working environment where everyone can achieve without fear or favour. We do not tolerate behaviour or attitude that supports coercion, intimidation or discrimination. You should always:

- speak up and do something about harassment, bullying or discrimination
- encourage and support those who challenge or report such behaviour.

You should never:

- tolerate any action or behaviour that could be viewed as harassment or bullying.
- accept any kind of unlawful discrimination.
- make inappropriate jokes, try to humiliate a colleague or spread gossip and rumours that might be or could be perceived as hurtful and disruptive.
- threaten a colleague with physical or verbal violence.

We do not tolerate any kind of harassment, bullying or discrimination against anyone who works for us or with us.

Further details can be found in the JDR Bullying & Harassment Policy.

4.3. Relationship with Customers, Suppliers and Other Stakeholders

We treat our customers, suppliers and other third parties ethically and honestly, with integrity and professionalism at all times. We are committed to working only with third parties whose own standards are consistent with our own. Third parties are entitled to expect of us the same standards of conduct that we expect of our colleagues and others.

We will select people and organisations based only on a fair and objective process. We will work with them to resolve disputes at an early stage and take on work from customers based on a clear understanding of what is required, where we are demonstrably competent and can add value.

5. JDR AS A CORPORATE CITIZEN

5.1. Health and Safety

At JDR we are totally committed to ensuring all of our employees, visitors and contractors, wherever they may be in our global organisation, return from work unharmed and that our activities have minimal impact on the environment. All of our global facilities have their management systems certified to ISO45001:2018 with UK and US facilities accredited to ISO14001:2015, all of which undergo regular review so that we maintain a cycle of continual improvement.

5.2. Respecting the Environment

Working in the offshore environment, JDR understands the need for awareness of the impact a business can have on the environment. We are focussed on ensuring that we minimise any adverse environmental impacts of our business activities by continually reviewing product design and manufacturing methodologies. We manage the carbon footprint and manage the waste and emissions that our operations produce.

5.3. Respecting Communities

We respect the community around us and we will listen to the concerns of local communities. Whenever we can, we will act to mitigate them to the very best of our powers. We will make appropriate contributions to those communities by encouraging participation in charity events and fund raising, community projects and voluntary work. We are also proud to be an employer in the communities where we operate.

You must check with the Compliance Officer before making any charitable donations in the name of JDR or arranging any fundraising events. In some circumstances charitable donations can be a front for bribery.

5.4. Political Activities

It is not JDR's policy to make any contributions to political parties, candidates or politically active organisations. Individuals are free to support any political party and make any donations as long as it is in their free time and expense and within local laws.

5.5. Human Rights

JDR has outlined our approach to Human Rights in our Human Rights Policy which is supported by our Responsible Sourcing Code.

We are committed to respecting internationally recognised human rights in line with the principles and guidance contained in the [UN Guiding Principles on Business and Human Rights](#). We respect all internationally recognised human rights as relevant to our operations, including those set out in the [International Bill of Human Rights](#) and the [International Labour Organisation's Declaration on Fundamental Principles and Rights at Work](#) and [OECD Guidelines for Multinational Enterprises](#). We recognise that while states have a duty to protect human rights, companies have a responsibility to respect human rights, this means acting with due diligence to avoid infringing on the rights of others and addressing the adverse impacts of our global operations.

5.6. Modern Slavery Statement

JDR is committed to ensuring that the human rights of those people that work with us and those working within our supply chains are protected. We do not tolerate any forms of slavery or human trafficking in our business and in our supply chain. We are committed to playing our part in eradicating all forms of modern slavery and human trafficking. Our Modern Slavery Plan includes:

1. Updating our terms and conditions of purchase,
2. Providing guidance and instructions on our expectations to key suppliers and
3. Carrying out a due diligence process on our suppliers starting with our key suppliers within our Human Rights Due Diligence process.

6. COMPANY PROPERTY AND INFORMATION MANAGEMENT

6.1. Company Property

We will respect and protect the company's property and resources and do not use them for any improper purpose. Company property includes physical assets and intangible assets. Physical assets are items such as materials, supplies, equipment and cash. Intangibles include information, intellectual property and employee time and talents.

You must never manipulate, inaccurately record or abuse expenses or claim sums not properly spent on company business. You will not use the company's property and resources for non-work related activities except to the extent permitted by our policies.

6.2. Confidential Information

Confidential information refers to any confidential and/or proprietary information belonging to JDR which is in the possession of any member of JDR. It may be oral, visual, in writing or in any other form. Examples include financial information, business plans, bid information, pricing policies etc. We keep confidential information safe and make sure it never gets into the wrong hands.

Disclosing confidential information can have a huge impact on JDR and JDR stakeholders. You must keep it safe, only share internally on a “need to know” basis and only disclose to a third party on a confidential basis and with appropriate authorisation to do so.

6.3. Financial Controls, Records and Reporting

We will ensure that our financial and other reports and records are complete and accurate. Even if it is unintentional, it is against the law in many countries to keep or submit financial records, reports or invoices that are inaccurate, incomplete or misleading.

Our books, records and financial reporting should accurately reflect the underlying transactions and represent the true state of the business. No "off books" accounts are maintained.

You will never record things incorrectly even if the customer wants us to do so. You will never record any transaction or expenditure in a misleading way. You will never destroy or alter any information or data that must be kept for litigation, an investigation or any other legal reason.

6.4. Company Communications and Disclosures

Company communications are any widely circulated internal or external messages about us or our business which is made by us or anyone we authorise to release communications on JDR's behalf. They include press releases, communications with news media or journalists, promotional materials and other public statements. This also includes internal communication sent to all staff at one site or to the entire company.

No matter what the communication medium you must take particular care about what you say in meetings or at other public events. You must take care not to betray the company's interests when using social networking websites, Twitter blogs and other electronic communications. You must not say nor write things that may embarrass JDR clients in any way or damage JDR's relationship with them.

6.4.1. Internal Communications

All internal company communications to all staff must have received prior internal approval by the CEO. The communication note is to be submitted to the HR team in the initial instance. The HR team representative will then forward the agreed communication note to the CEO, copying the Executive Assistant to the CEO, Chief Technology Officer, Chief Sales Officer Renewable Energy and Chief Operating Officer. If the CEO is unavailable then the other members of the JDR Board and Executive Team will agree and approve the internal communication.

6.4.2. External Communication

All external company communication must be approved by the JDR CEO and Board of Directors. All external communications and press releases are managed by the Marketing Team, with the Director of Marketing, Telefonika responsible for the process. All external communications whether proposed by JDR or our supply-chain should be forwarded to the

Director of Marketing to coordinate the progress of the announcement. The Director of Marketing will ensure the proposed external communication is agreed by key stakeholders in sequence:

1. Originator of the Communication, e.g. Sales Manager upon Contract Award
2. External PR Agency, as required.
3. JDR Project Manager
4. Customer
5. JDR CEO & Board Members

No communication will be issued unless the above stakeholders are all in agreement. Once the above process is finalised Head of HR must be informed in order to coordinate the internal release of the information prior to its external release. This applies to any external communication, whether from JDR or a third party.

6.5. Using Company Computer Systems

Company computer systems are for use at work. However, JDR permits reasonable and appropriate use for non-work related purposes, which are detailed in the JDR Computer Network and Internet Access policy.

You should not use company computer systems to access, obtain, create or distribute any material that is illegal or offensive or that is obtained illegally. This includes obscene, pornographic, sexist, racist, defamatory and abusive material or material that is in breach of copyright.

You should not use company computer systems to set up or carry out personal businesses. You must not install any software that has not been approved or purchased by the IT Department at JDR.

Further details can be found in the JDR Computer and Internet Access policy.

6.6. Protecting Personal Information

We will protect everyone's privacy and comply with data protection and privacy laws. Data protection and privacy laws regulate the collection, storage, disposal and use and disclosure of personal information which can identify a living person.

You must protect personal information and keep it confidential and secure and make sure it is only shared with people who have a legitimate need to know or with the consent of those whose information we hold.

Further details can be found in Privacy Notices available on the Company Intranet.

7. Monitoring and Review

It shall be the responsibility of the Compliance Officer to review this Policy and its implementation on an annual basis.

If you want to ask a question about the requirements in this Policy, you should raise it with the Compliance Officer.