



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 we 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, wherein all our employees are required to confirm annually that they are familiar and comply with the Company's compliance documents, including 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 over 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, Tomball in Texas and Macae in Brazil. JDR 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 2025.

We are focussed on our responsibilities to our people, customers, suppliers and the wider community in which JDR operates. We believe our reputation, together with the trust and confidence of those

with whom we trade and have an impact on, 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 subject 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 our expectations 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 assesses our existing supply chain for compliance in line with the Modern Slavery Act 2015. Our requirements and those of our clients and stakeholders are shared and cascaded to our suppliers.

For any supplier responses that are deemed unsatisfactory, JDR will propose improvements to those suppliers and offer support in implementing change. We require all our suppliers and subcontractors, irrespective of size, to adhere to our 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 also applies to all our supply chain partners and suppliers, as a standard requirement of conducting business with us. JDR’s Ethics Policy 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 ‘whistleblowing’ 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 such concerns anonymously.

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

Human Rights and Modern Slavery 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 does 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 internally circulated following any changes 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 components 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 initiatives 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. We have 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

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 awareness, during 2024 and 2025 we will be implementing an annual confirmation programme whereby employees will receive a digital communication containing JDR's Human Rights, Modern Slavery, Speak Up and Ethics Policies. All employees will be required to confirm that they understand and agree to comply with the contents contained within these important Compliance Policies.

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 and 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 Q1 2025 and will integrate it into our new starter programme that year.

ASSESSING AND MANAGING RISK THROUGHOUT 2023

We have made been able to make greater progress with our supply chain investigations during 2023 and have had more opportunities to engage positively and in person with our supply chain to develop and implement our Responsible Sourcing Code processes. JDR have implemented more onerous and focussed reporting requirements on our supply chain including the requirements to report on greater aspects of workforce management and the need to provide further detail on the treatment of the employees contained within our supply chain.

During 2023, we continued to develop our KPI reporting metrics to enable us to demonstrate the outcomes of all our assessments. This enables 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 2023, 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 2024.

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 2024, JDR are 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. JDR are investigating methods of be able to efficiently investigate the compliance of our entire supply chain and are aiming to have the ability to report on this compliance by Q2 2025.

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 2023 and ending 31st December 2023. The Policy will be reviewed and updated annually.

Signature:



Name: James Young

Title: Chief Strategy and Compliance Officer

Date: 20/02/2025