



HUMAN RIGHTS AND MODERN SLAVERY POLICY

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HUMAN RIGHTS AND MODERN SLAVERY POLICY

The JDR Group of companies respects and supports the dignity, wellbeing and human rights of our employees, the communities in which we live and those who might be affected by our global operations. 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, the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work ("ILO"), and OECD Guidelines for Multinational Enterprises ("OECD").

As a Group operating globally with entities in the United Kingdom, the United States and Brazil, we also recognise and comply with relevant national laws, including but not limited to:

- **United Kingdom** – Modern Slavery Act 2015, Equality Act 2010, Health and Safety at Work Act 1974
- **United States** – Tariff Act §307 (forced labour), Trafficking Victims Protection Act (TVPA), Fair Labor Standards Act (FLSA)
- **Brazil** – Brazilian Federal Constitution (Article 149 – prohibition of slave-like labour), Consolidation of Labour Laws (CLT), Law No. 13.344/2016 (anti-trafficking legislation)

Where national legislation and international human rights standards differ, we will follow the higher standard. Where laws conflict, we will comply with national law while seeking ways to respect international human rights to the greatest extent possible.

This policy sets out the principles with respect to human rights and modern slavery and how we relate this to our employees, contractors, suppliers and partners, as well as communities affected by our business activities in all territories where we operate. This policy sits alongside our Modern Slavery Statement, HSEQ Policy and relevant employee-facing policies including, but not limited to, our Ethics Policy, Recruitment and Training and Development Policies.

We see salient issues as where we could do people most harm in both our own operations and our extended supply chains. Across the UK, US and Brazil, we manage human rights by understanding our greatest risks, conducting due diligence, acting on our findings, integrating responses into our internal systems, tracking our actions and communicating with our stakeholders about how we address impacts.

We will:

- Seek to avoid causing or contributing to adverse human rights impacts through our own activities and address such impacts, if they do occur, in a timely and appropriate manner.
- Seek to prevent or mitigate adverse human rights impacts that are directly related to our operations, products and services through our business relationships.
- Provide for or cooperate in remediation through legitimate processes, where we identify that we have caused or contributed to adverse human rights impacts.
- Continue to look for ways to promote respect for human rights within our global sphere of influence, including in the UK, US and Brazil.

We require all our employees and hired contractors in all regions to comply with this policy and will seek to provide ongoing training and tools to support them, tailored to regional legal requirements where necessary.

Modern slavery is both a crime and a violation of fundamental human rights. We are committed to the elimination of all forms of modern slavery and child labour globally. We take a zero-tolerance approach to such activities and seek to identify and address such risks across our facilities, operations and wider supply chains. JDR Cable Systems Ltd publishes an Annual Statement on Modern Slavery that outlines our activities, performance and actions taken during the year in accordance with the UK Modern Slavery Act 2015.

We recognise the critical role played by our suppliers in enabling responsible sourcing. Our Responsible Sourcing Code sets out our expectations with regards to respect for human rights, based on ILO core labour standards, and requires suppliers in the UK, US and Brazil – and globally – to ensure:

- Fair treatment and non-discrimination of workers
- Safe, healthy and secure working conditions
- Zero tolerance for human trafficking, modern slavery, forced labour or illicit child labour
- Respect for communities' rights, including access to water, livelihood and natural resources

We will only work with suppliers who implement our Responsible Sourcing Code and who demonstrate transparency and commitment to continuous improvement. Our Responsible Sourcing Code contains clear requirements and guidance on grievance mechanisms.

We recognise the importance of dialogue with our employees, workers and external stakeholders who are or could potentially be affected by our actions. We pay particular attention to vulnerable



groups and recognise that risks may manifest differently across the UK, US and Brazil. We also recognise that women and men may face different risks.

As part of this commitment, we do not tolerate threats, intimidation, physical or legal attacks against human rights defenders – including those exercising their rights to freedom of expression, association, peaceful assembly or protest – in any territory where we operate.

Grievances

We place importance on the provision of effective remedy wherever human rights impacts occur within our operations, including within the UK, US or Brazil supply chain, through confidential internal and external grievance mechanisms, which may be accessed in the relevant local language where applicable.

If you believe that a conflict has arisen between the language of this policy and the laws, customs or practices of the place where you work, or if you have any questions or concerns about this policy, you should raise them in confidence through our grievance channels.

The Board review and approve this policy annually and it is signed on behalf of the JDR Group by all its Board Members.

For and on behalf of JDR Cable Systems Limited

Jonathan Knott

Carl Pilmer, [Signature]

Piotr Mirek Tomasz Nawak

For and on behalf of JDR Cable Systems Inc.

Tomasz Nawak [Signature]

For and on behalf of JDR Comercio de Sistemas de Cabos, Umbilicais e Servicos Ltda

Tomasz Nawak