

LS Cable & System

1: Opening statement from senior management

LS Cable & System is committed to preventing acts of modern slavery and human trafficking from occurring within its business and supply chain, and imposes the same high standards on its suppliers. We are proud of the steps we have taken to combat slavery and human trafficking. We have implemented the LS Cable & System Sustainability Management Policy, as part of which the seven committee system (Customers, Social Contribution, Risk Control, Suppliers, Ethics Management, Green Management and Employees) aims to prevent the use of modern slavery and human trafficking in the LS Cable group of companies (the '**Group**'). In addition, we have implemented the LS Cable & System Anti-Slavery Policy (the '**Policy**') which strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We are, and will continue to be, committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. To find out more information, please click <http://www.lscns.com/en/intro/report.asp>.

This statement sets out the steps taken by the Group, including LS Cable & System UK Limited, during the financial year ending 31 December 2019.

2: Structure of the organisation

LS Cable & System is a global organisation operating in the energy and communications sector and it manufactures cables and materials. It is the parent company of the Group which employs around 4,612 people worldwide and has business operations in 18 countries.

The Group has a global annual turnover in excess of £36 million. To find out more about the nature of our business, please click www.lscns.com.

In order to manufacture power, telecommunication and industrial cables and materials, we work with a range of international suppliers that supply raw materials and products.

3: Policies

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

We also make sure our suppliers are aware of our policies, and adhere to the same high standards.

4: Due diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we have adopted due diligence procedures which are designed to:

- establish and assess areas of potential risk in our business and supply chains;

- monitor potential risk areas in our business and supply chains;
- reduce the risk of slavery and human trafficking occurring in our business and supply chains; and
- provide adequate protection for whistleblowers.

5: Risk and compliance

We have zero tolerance for slavery and human trafficking. Our suppliers are required to hold their own suppliers to the same high standards.

We regularly evaluate the nature and extent of its exposure to the risk of modern slavery occurring in its supply chain by carrying out risk identification and analysis as part of our risk management procedures.

As part of our ongoing risk assessment and due diligence processes, we consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Policy.

We also assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties. Using our risk-based approach, we will also assess the merits of writing to suppliers requiring them to comply with our Policy, which sets out the minimum standards required to combat modern slavery and trafficking.

If we find that other individuals or organisations working on our behalf have breached our Policy we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remedied and whether that might represent the best outcome for those individuals impacted by the breach, to terminating such relationships.

6: Training

We invest in educating our staff to recognise the risks of modern slavery and human trafficking in our business and supply chains. Through our training programmes, employees are encouraged to identify and report any potential breaches of our anti-slavery and human trafficking policy. Employees are taught the benefits of stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from our business and supply chains.

7: Further actions and sign-off

Following our review of our actions this financial year to prevent slavery or human trafficking from occurring in our business or supply chains, we intend to carry out a formal review each year to identify any issues or areas for improvement.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes the Group's slavery and human trafficking statement for the financial year commencing 1 January 2019 and ending 31 December 2019.

This statement was approved by the board of directors on 23rd October 2020.

Signature:

A handwritten signature in black ink, appearing to read 'Sangdon Lee', written in a cursive style.

Director

Sangdon Lee

Date: 23rd October 2020

Anti-Slavery Policy

1 What is slavery?

1.1 The Modern Slavery Act (MSA) 2015 covers four activities:

Slavery	Exercising powers of ownership over a person
Servitude	The obligation to provide services is imposed by the use of coercion
Forced or compulsory labour	Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily
Human trafficking	Arranging or facilitating the travel of another person with a view to their exploitation

1.2 This policy covers all four activities.

2 How is it relevant to us?

2.1 Modern slavery is a complex and multi-faceted crime and tackling it requires all of us to play a part. At first glance, you may think this whole subject is irrelevant to us, but it's not.

2.2 At a very basic level, of course preventing exploitation and human trafficking, and protecting our workforce and reputation makes good business sense.

2.3 The MSA 2015 recognises the important part businesses can and should play in tackling slavery and encourages them to do more.

2.4 With this in mind, we need to pay particularly close attention to:

2.4.1 our supply chain

2.4.2 any outsourced activities, particularly to jurisdictions that may not have adequate safeguards

2.4.3 cleaning and catering suppliers

2.4.4 corporate hospitality

3 Responsibilities

3.1 LS Cable & System, our managers and colleagues have responsibilities to ensure our fellow workers are safeguarded, treated fairly and with dignity.

3.2 Everyone must observe this policy and be aware that turning a blind eye is unacceptable and simply not an option.

3.3 The firm

3.3.1 We will:

- (a) maintain clear policies and procedures preventing exploitation and human trafficking, and protecting our workforce and reputation
- (b) be clear about our recruitment policy (see Recruitment)

- (c) check our supply chains (see Supply chains)
- (d) lead by example by making appropriate checks on all employees, recruitment agencies, suppliers, etc to ensure we know who is working for us
- (e) ensure we have in place an open and transparent grievance process for all staff
- (f) seek to raise awareness so that our colleagues know what we are doing to promote their welfare
- (g) make a clear annual statement setting out the steps we have taken to ensure slavery and human trafficking is not taking place in our supply chains and to demonstrate that we take our responsibilities to our employees and our clients seriously (see Anti-slavery statement)

3.4 Managers

3.4.1 Managers will:

- (a) listen and be approachable to colleagues
- (b) respond appropriately if they are told something that might indicate a colleague or any other person is in an exploitative situation
- (c) remain alert to indicators of slavery (see Identifying slavery)
- (d) raise the awareness of our colleagues, by discussing issues and providing training, so that everyone can spot the signs of trafficking and exploitation and know what to do
- (e) use their experience and professional judgement to gauge situations

3.5 Colleagues

3.5.1 We all have responsibilities under this policy. Whatever your role or level of seniority, you must:

- (a) keep your eyes and ears open—if you suspect someone (a colleague or someone in our supply chain) is being controlled or forced by someone else to work or provide services, follow our reporting procedure (see Reporting slavery)
- (b) follow our reporting procedure if a colleague tells you something you think might indicate they are or someone else is being exploited or ill-treated
- (c) tell us if you think there is more we can do to prevent people from being exploited

4 The risks

4.1 The principal areas of risk we face, related to slavery and human trafficking, include:

4.1.1 supply chains

4.1.2 recruitment through agencies

4.1.3 general recruitment

4.2 We manage these risk areas through our procedures set out in this policy and elsewhere.

5 Our procedures

5.1 Anti-slavery statement

5.1.1 We make a clear annual statement setting out the steps we have taken to ensure slavery and human trafficking is not taking place in our supply chains and to demonstrate that we take our responsibilities to our employees, people working within our supply chain and our clients seriously.

5.1.2 We make this statement on our website.

5.1.3 Our historic statements remain available on our website.

5.2 Supply chains

5.2.1 We thoroughly check supply chains to ensure the potential for slavery and human trafficking is significantly reduced.

5.2.2 We tell the companies we do business with that we are not prepared to accept any form of exploitation.

5.2.3 All our supplier contracts contain an anti-slavery clause. This clause, which flows down through all layers of our supply chain, prohibits suppliers and their employees from engaging in slavery or human trafficking.

5.2.4 We ensure we can account for each step of our supply processes—we know who is providing goods and services to us and we have mechanisms and processes in place to check, including:

- (a) when appointing or re-appointing suppliers we risk assess those suppliers; and
- (b) where necessary we will carry out a process of auditing suppliers.

5.3 Recruitment

5.3.1 Using agencies

- (a) Our HR department follows firm policy and only uses agreed specified reputable recruitment agencies.
- (b) To ensure the potential for slavery and human trafficking is reduced as far as possible, we thoroughly check recruitment agencies before adding them to our list of approved agencies. This includes:
 - (i) conducting background checks
 - (ii) investigating reputation
 - (iii) ensuring the staff an agency provides have the appropriate paperwork (eg work visas)
 - (iv) ensuring the agency provides assurances that the appropriate checks have been made on the person they are supplying

5.3.2 General recruitment

- (a) We always ensure all staff have a written contract of employment and that they have not had to pay any direct or indirect fees to obtain work.

- (b) We always ensure staff are legally able to work in the UK.
 - (c) We check the names and addresses of our staff (a number of people listing the same address may indicate high shared occupancy, often a factor for those being exploited).
 - (d) We provide information to all new recruits on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.
- 5.4 If, through our recruitment process, we suspect someone is being exploited, the HR department will follow our reporting procedures (See Reporting slavery).

6 Identifying slavery

- 6.1 There is no typical victim and some victims do not understand they have been exploited and are entitled to help and support.
- 6.2 However, the following key signs could indicate that someone may be a slavery or trafficking victim.
 - 6.2.1 The person is not in possession of their own passport, identification or travel documents.
 - 6.2.2 The person is acting as though they are being instructed or coached by someone else.
 - 6.2.3 They allow others to speak for them when spoken to directly.
 - 6.2.4 They are dropped off and collected from work.
 - 6.2.5 The person is withdrawn or they appear frightened.
 - 6.2.6 The person does not seem to be able to contact friends or family freely.
 - 6.2.7 The person has limited social interaction or contact with people outside their immediate environment.
- 6.3 This list is not exhaustive.
- 6.4 Remember, a person may display a number of the trafficking indicators set out above but they may not necessarily be a victim of slavery or trafficking. Often you will build up a picture of the person's circumstances which may indicate something is not quite right.
- 6.5 If you have a suspicion, report it.

7 Reporting slavery

- 7.1 Talking to someone about your concerns may stop someone else from being exploited or abused.
- 7.2 If you think that someone is in immediate danger, dial 999.
- 7.3 Otherwise, you should discuss your concerns with Sangdon Lee, Managing Director of Cable & System UK Limited (tel +44 (0) 1932 331 860 who will decide a course of action and provide any further advice.

7.4 Not all victims may want to be helped and there may be instances where reporting a suspected trafficking case puts the potential victim at risk, so it is important that in the absence of an immediate danger, you discuss your concerns first with Sangdon Lee before taking any further action.

8 Training

8.1 We provide specialist training to those staff members who are involved in managing recruitment and our supply chains.

8.2 More general awareness training is provided to all staff.

9 Monitoring our procedures

9.1 We will review our Anti-slavery policy regularly, at least annually. We will provide information and/or training on any changes we make.