	Document Title:	Document Number	Issue No:
	Modern Slavery and Human Trafficking Statement	HRUK046	02
	Document Type: Policy	Classification: Public	
	Print Date: 26/11/2019	Approved By: CEO UK, Head of HR UK	
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1 Introduction and Scope

This statement sets out Landis+Gyr's actions within its UK and global operations to understand all potential modern slavery risks and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking activities in its own business and its supply chains. This statement relates to actions and activities undertaken prior to and during the financial year [1st April 2018 to 31st March 2019].

As a global industry leader in the manufacture of metering solutions, Landis+Gyr recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Landis+Gyr already has policies and codes of conduct which assist in ensuring its business and supply chains are free from slavery and human trafficking, however it is committed to reviewing these policies and practices over the forthcoming financial year (1st April 2019 to 31st March 2020) in order to ensure they remain relevant in relation to the Modern Slavery Act 2015 and transparent in the organisation's approach to modern day slavery and human trafficking.

2 Landis+Gyr UK Organisational Structure, Business Activities and Supply Chains

Landis+Gyr currently have 4 sites in the UK, as follows:


- The Stockport site manufactures gas meters and employs circa 320 employees;
- The Northfields site supports the UK and Regional Operations for gas and electric meters and employs circa 120 employees;
- The Manchester site (a wholly owned subsidiary) provides software development and support functions and employs circa 35 employees; and
- The Dunfermline site employs circa eight technical/innovation support staff for the metering production business.

3 Business Activities

Landis+Gyr is a leader in the manufacture of metering solutions and provider of integrated energy management solutions for electricity, heat/cold and gas tailored to help energy companies build smartgrids. The Company offers the broadest portfolio of products, systems and services including advanced metering, sensing and automation tools, load control, analytics as well as energy storage solutions.

Some characteristics of Landis+Gyr are:

- A leading global brand with 100+ year history;
- Broadest portfolio of products and services in the industry;
- Local presence in more than 30 countries on all five continents;
- Over 3,500 utility relationships worldwide with the largest installed global base in the industry (>300 million installed devices);
- 25 years of smart metering innovation and over 60 years of direct load management expertise;
- Over 25million smart grid-enabled endpoints deployed or contracted globally;

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- Over 15 million endpoints actively managed in long-term contracts;
- Certified to ISO standards in relation to quality, health & safety, environmental and information security processes;
- A worldwide team of over 900 engineers and research professionals; and
- Committed to improving energy efficiency and environmental conservation.

4 Landis+Gyr UK Employment

Landis+Gyr employment policies and procedures are regularly reviewed and are in line with UK and European legislation.

5 Metering Supply Chain

The supply chain to the UK includes the provision of meter components from: UK; France; Germany; Poland; Romania; Slovenia; and China.

Currently we use supplier audits and supplier code of conduct agreements to define and agree the level of Corporate Social Responsibility (CSR) controls. These will be reviewed on an ongoing basis to ensure their continued alignment with the Modern Slavery Act 2015.

All key Tier 1 (direct) suppliers to the UK, are required to comply with our Corporate Code of Conduct for Suppliers, which has a specific section on 'Employment Practices.' They are required to sign to acknowledge not only their own agreement and compliance with the code, but also to confirm that each of their subcontractors / temporary labour agencies have been made aware of the code and can demonstrate compliance.

A key performance indicator for the Supplier Quality and Procurement teams, is to conduct thorough audits of High Risk suppliers each year following a risk-based approach. This audit programme is currently being aligned with Responsible Business Alliance (RBA) requirements, which address modern slavery and human trafficking.

6 Relevant Policies

Landis+Gyr operates the following policies that support its approach to the identification of slavery and human trafficking risks and preventative measures to be taken.


These policies are reviewed on an annual basis by the appropriate owners to ensure they remain in line with the Modern Slavery Act 2015.

6.1 Code of Business Ethics and Conduct

The organisation aims to conduct transactions in full compliance with applicable laws and regulations. These are the conditions under which we compete, deliver value and act as responsible members of our communities.

Landis+Gyr are committed to providing the right training and guidance to all of its workers to succeed honestly and abide by this commitment.

Employees are expected to comply with all applicable laws and regulations and to conduct themselves with the highest level of ethics and integrity. Employees are encouraged to seek the advice of the Compliance Officer, their line manager and/or the legal department in case of any question.

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6.2 Corporate Social Responsibility (CSR) Policy and Directive

This Policy and Directive define the organisation's senior management's commitment to manage CSR in accordance with industry best practice (i.e. Responsible Business Alliance Code of Conduct). The Policy and Directive cover the following topics: labour; health and safety; environmental ethics and management systems.

6.3 "Speak Up" Policy

Landis+Gyr encourages all of its employees, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's "Speak Up" policy (as detailed in 'Group [Code of Business Conduct and Ethics](#)') is designed to make it easy for employees to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can use our confidential helpline. Awareness is demonstrated through various communication channels and training.

6.4 Code of Conduct for Suppliers

The organisation is committed to ensuring that its suppliers adhere to an agreed standard of ethics. Suppliers are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation requires every supplier to sign in acknowledgement of the Code of Conduct and confirm they will be compliant.

6.5 UK Recruitment and Selection Policy


The organisation ensures all recruitment and selection within the UK is in line with relevant legislation and strives to incorporate best practice wherever possible and practicable.

6.6 UK Dignity at Work Policy

The organisation is committed to providing a healthy working environment for its workers, ensuring they feel valued and respected. This policy is designed to prevent bullying and harassment and enable workers to carry out their work in a safe environment and is also further supported by the '[Group Code of Business Conduct and Ethics](#)'

6.7 Group QEHS Policy

The Group QEHS Policy is aligned to the requirements of ISO9001, ISO45001 and ISO14001 and requires the organisation to comply with all applicable national QEHS legislation.

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7 **Actions for the following financial year (01.04.2019 to 31.03.2020)**

- 1 Review all of the policies outlined in this Modern Slavery and Human Trafficking Statement to ensure continued alignment with the Modern Slavery Act 2015, strengthening where necessary.
Accountability for action: Policy Owners
- 2 Map the Supply Chain broadly to assess particular product or geographical risks of modern slavery and human trafficking.
Accountability for action: Group Supplier Quality Manager
- 3 Review current Vendor Questionnaire, incorporate additional requirements in line with the Responsible Business Alliance Code of Conduct and implement these additional requirements within supplier audit programme.
Accountability for action: Group Supplier Quality Manager
- 4 Increase the focus within current audit requirements with regard to slavery and human trafficking risks.
Accountability for action: UK Head of HR / Group Supplier Quality Manager.
- 5 Within the next 12 months identify the training needs and proposed delivery of training for all staff working directly within the Supply Chain, including Auditors.
Accountability for action: Group Supplier Quality Manager
- 6 Within the next 12 months raise employee's awareness of modern slavery and human trafficking issues through an intranet communication.
Accountability for action: Chief Compliance and Data Privacy Officer

Section 54 of the Modern Slavery Act 2015 requires commercial organisations to prepare a slavery and human trafficking statement for each financial year of the organisation. The statement must set out the steps that the organisation has taken during the financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains, and in any part of its own business.

Landis+Gyr are committed to reviewing their modern slavery and human trafficking statement each year with the aim of continually evolving and improving their stance.

Simon Egan

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