	Document Title: <b>Modern Slavery and Human Trafficking Statement</b>	Document Number: <b>HRUK046</b>	Issue No: <b>03</b>
	Document Type: <b>Policy</b>	Classification: <b>Public</b>	
	Print Date: 23/11/2020	Approved By: <b>Managing Director UK/Ire/NL, Head of HR UK</b>	
	Document Owner: <b>UK IMS Coordinator</b>		

## 1 Introduction and Scope

This statement sets out Landis+Gyr's actions within its UK 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 [1<sup>st</sup> April 2020 to 31<sup>st</sup> March 2021].

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 (1<sup>st</sup> April 2020 to 31<sup>st</sup> March 2021) 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 3 sites in the UK, as follows:


- The Stockport site manufactures gas meters and employs circa 300 employees.
- The Northfields site manufactures electric meters and employs circa 100 employees.
- The Landing site provides software development and support functions and employs circa 30 employees.

## 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;
- 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;

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- 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 vendor questionnaires, supplier audits, supplier code of conduct agreements and general supplier 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 Gas metering business, which contribute 95% of total direct spend, 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.

An exercise has also commenced to identify any gaps within the non-key Tier 1 suppliers, including issuing the Code of Conduct for Suppliers.

Specific to the electricity metering business in China and India, 5 audits have been conducted in China in the last 12 months and 7 in India. All Tier 1 Suppliers within the electricity metering business must sign the Code of Conduct for Suppliers, which includes production and site services suppliers.

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.

Failure to comply with the Code of Conduct for Suppliers will be sufficient grounds for Landis+Gyr to terminate its contractual relationship with the supplier and may result in its removal from the Landis+Gyr approved supplier base.

## 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 and the responsibility to ensure they remain in line with the Modern Slavery Act 2015 rests with Quality & Compliance Functions.

### 6.1 Code of Business Ethics and Conduct

The organisation upholds the letter and spirit of the law in all locations in which our business operates and conducts 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.

We are convinced of our ability to succeed honestly and expect all employees to abide by this conviction.

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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 supervisor, or the legal department in case of any question.

## 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. The Policy and Directive cover the following topics: labour; health and safety; environmental ethics and management systems.

## 6.3 “Speak Up” Policy

The organisation encourages all 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 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.

## 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. Serious violations of Landis+Gyr’s Code of Conduct for Suppliers will lead to the termination of the business relationship.

## 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.

## 6.7 EMEA QEHS Policy

The organisation complies with its legal obligations under the Health and Safety at Work etc. Act 1974.

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## 7 **Actions for the following financial year (01.04.2020 to 31.03.2021)**

- 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 and incorporate additional requirements in line with the Responsible Business Alliance Code of Conduct.  
Accountability for action: Group Supplier Quality Manager
- 4 Increase the focus within current audit requirements with regards to slavery and human trafficking risks.  
Accountability for action: UK Head of HR / Group Supplier Quality Manager.
- 5 Within the next 12 months raise employee's awareness of modern slavery and human trafficking issues through appropriate training.  
Accountability for action: Global Data Protection Officer
- 6 VDA6.3 – Auditing – at least 10 suppliers audit will cover requirements of the Modern Slaver Act 2015  
Accountability for action: Group Supplier Quality Manager

Tracking mechanism is in the place and progress of the above actions will be reviewed on 6-monthly basis by SLT during IMS Review meeting.

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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Landis+Gyr UK