	Document Title: Modern Slavery and Human Trafficking Statement	Document Number HRUK046	Issue No: 5
	Document Type: Policy	Classification: Public	
	Print Date:	Approved By: Managing Director UK/Ire, Head of HR Global SCM & UK	
	Document Owner: UK EHS, IMS & Facility Coordinator		

1 Introduction and Scope

This statement sets out Landis+Gyr Ltd's (**together, Landis+Gyr, our, we**) 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 are no slavery or human trafficking activities in its own business or within that of its supply chain partners. This statement relates to actions and activities undertaken prior to, and during, the financial year [1 April 2023 to 31 March 2024].

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 April 2023 to st March 2024) 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 has 2 sites in the UK, as follows:

- The Lake House site provides Research & Development, Software Development and support functions and employs circa 70 employees.
- The Landing site provides Research & Development, Software Development and support functions and employs circa 150 employees.


3 Business Activities

Landis+Gyr Ltd is part of the Landis+Gyr Group, which is headquartered in Switzerland. Our ultimate parent company, Landis+Gyr Group AG (SIX: LAND), together with its subsidiary and affiliate businesses, (Landis+Gyr Group) employs approximately 7000 employees worldwide, and has a presence in 30 countries, across five continents with the mission of helping the world manage energy better

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 smart grids. 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;

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- 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, business continuity and information security processes;
- A worldwide team of over 900 engineers and research professionals;
- 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 business, 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.

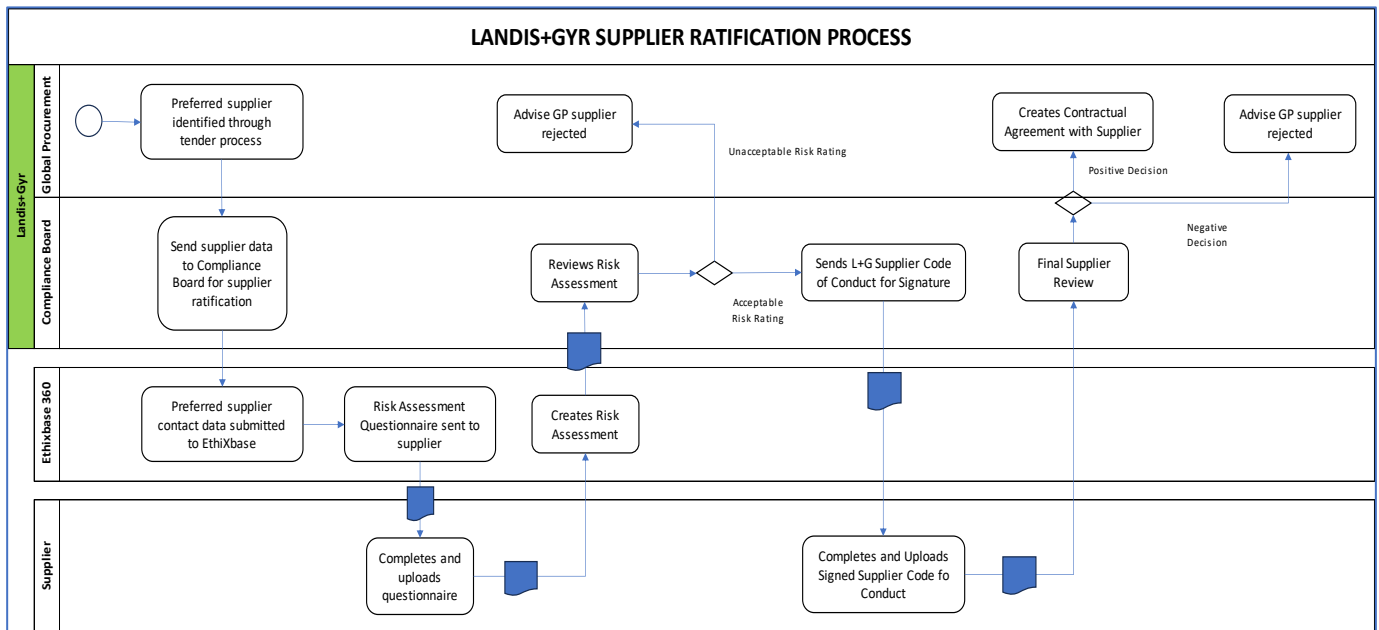
An exercise has also identified any gaps within the non-key Tier 1 suppliers, including issuing the Code of Conduct for Suppliers.

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.

Our suppliers are selected in accordance with our supplier selection process with compliance requirements being formally reviewed as the final post-tender selection step as described in the flow chart below:

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Once a preferred supplier has been identified, there are two further steps to ratify the future commercial relationship:

1. A Supplier Risk Assessment
2. A Supplier Code of Conduct Review

We expect our suppliers to commit to, and implement, business practices will full respect to the environment, human rights, health, safety, decent work conditions and fair business standards. The Landis+Gyr Compliance Board (made up of members from Global Procurement, Global Quality, along with the Chief Compliance Officer) works with a third-party risk assessment provider (Ethixbase 360). This organization provides a third-party risk management platform to review anti-bribery & corruption, modern slavery and ESG risk management criteria and an objective risk indicator. Specifically for modern slavery and human rights, the risk is analysed through a questionnaire process with the supplier in collaboration with Norton Rose Fulbright, a global law firm. This draws upon five key indicators to assess a supplier's modern slavery risk: Jurisdiction (country of operations and HQ); industry; products, workforce characteristics and risk-mitigating measures specific to each supplier.

If the 'Supplier Risk Assessment' is negative (i.e., unacceptable), the supplier is advised that Landis+Gyr will not engage in any business with them. If the 'Supplier Risk Assessment' is positive, the Compliance Board will forward our Landis+Gyr Supplier Code of Business Conduct + Green Procurement Annexe policy to the supplier for signatory acceptance. This document is based on the RBA (Responsible Business Alliance) Code of Conduct, but also includes further clauses specifically related to cyber security. The supplier is required to sign acknowledgment and adherence to the content and return this to the Compliance Board. A final review is undertaken, the signatures are checked (notably in terms of signatory authority of the supplier) and a final decision is shared with the business based on an appreciation of all materials.

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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.

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 Directive defines the commitment by Landis+Gyr Group's senior management to manage ESG in accordance with industry best practices. The Directive addresses corporate governance, business conduct, employment practices, health and safety, environmental practices, and supplier management.


UN Global Compact and UN Declaration of Human Rights and ILO Declaration of Fundamental Rights at Work.

The Landis+Gyr Group joined the UN Global Compact in 2019. Our fair labour standards are aligned with the global standards and guidelines set by the UN Global Compact, as well as those set by the United Nations Universal Declaration of Human Rights and the Declaration on the Fundamental Principles and Rights at Work of the International Labor Organization (ILO).

6.3 "SpeakUp" and Whistle Blowers Policies

The Landis+Gyr Group encourages all its employees, customers, suppliers, and other business partners to report any concerns they may have in relation to the Landis+Gyr business activities, or its supply chains, including any risks associated with slavery or human trafficking via our 'SpeakUp' system. Employees, customers, suppliers, or others who have concerns can use our confidential SpeakUp helpline or submit their complaint by contacting a third-party Ombudsperson. In addition, our Australian Whistleblower Policy ensures that employees, suppliers, and business partners can raise concerns, anonymously if they wish, about any misconduct or improper state of affairs within our organisation.

The Landis+Gyr SpeakUp system is an external independently managed resource open to external partners, including employees of our supplier network in the event that any concerns related to business practices of our third-party partners needs to be reported or investigated.

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6.4 Supplier Audit Programme

The Landis+Gyr Group supplier quality and procurement teams conduct detailed onsite audits of many of our tier-one suppliers on an annual basis, following a risk-based approach. Our supplier audit programme is rigorous and aligned with the Responsible Business Alliance (RBA) code of conduct requirements, which addresses and seeks to minimise the risks of modern slavery and human trafficking. Our internal auditors have received training on the RBA code of conduct requirements.

The Landis+Gyr Group takes a risk-based approach to management of modern slavery with tier-two suppliers (being the businesses that supply products or services to our tier-one suppliers). Certain tier-two suppliers (based on risk profile) are required to sign the Landis+Gyr Supplier Code of Conduct and undergo a Landis+Gyr supplier audit.

During this reporting year, Landis+Gyr was able to perform key supplier audits at 14 different supplier locations, most notably in China, where 9 audits have been undertaken, using a combination of onsite and virtual auditing techniques. These were a combination of tier one and tier two audits. There were zero non-conformances identified related to modern slavery as an outcome of these audits.

6.5 Employee Training Plan

In 2023, Landis+Gyr will continue to conduct mandatory modern slavery training programs for management, human resources, procurement, and supply chain personnel located in the UK and across EMEA. The training scope includes: (i) modern slavery risk identification, assessment, mitigation, and management; (ii) tools and processes used by Landis+Gyr to identify and mitigate modern slavery risks; and (iii) reporting and legal requirements under the Modern Slavery Act. The training serves to raise awareness of Modern Slavery risks and the various internal tools and processes utilized by Landis+Gyr to identify, mitigate and manage modern slavery risks in its supply chains and operations.

In addition, Landis+Gyr Group office-based employees are required to undertake annual mandatory Code of Business Ethics and Conduct training, which for the fiscal year 2023-2024 will be launched in November 2023.

Supplier Training Plan


As part of the ongoing supplier due diligence, we use an external provider to create training content related to the Supplier Code of Conduct. Using an external LMS platform, this training is sent to all supplier partners on an annual basis; participation and completion rates are tracked, and suppliers who have not completed the training are contacted by our procurement and account management employees.

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 (01.04.2023 to 31.03.2024)

- 1 Review all policies outlined in this Modern Slavery and Human Trafficking Statement to ensure continued alignment with the Modern Slavery Act 2015, strengthening where necessary.
Responsible: Policy Owners
- 2 Review current Vendor Questionnaire and incorporate additional requirements in line with the Responsible Business Alliance Code of Conduct.
Responsible: Procurement Manager
- 3 Maintain the focus within current audit requirements with regards to slavery and human trafficking risks.
Responsible: Group Supplier Quality Manager.
- 4 Within the next 12 months raise employee's awareness of modern slavery and human trafficking issues through appropriate training.
Responsible: Chief Compliance Officer / Quality / Procurement
- 5 VDA6.3 – Auditing – suppliers audit will cover requirements of the Modern Slavery Act 2015.
Responsible: Procurement Manager

Tracking mechanism is in the place and progress of the above actions will be reviewed on an annual basis by the leadership team 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.

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