



On behalf of Supplier, its group and affiliated companies, I acknowledge receipt of the Landis+Gyr Code of Conduct for Suppliers.¹ I hereby confirm that each of our facilities that supplies components, materials, products or services to Landis+Gyr complies with the terms listed therein, and which are summarized below.

EMPLOYMENT PRACTICES: Landis+Gyr believes all workers in our supply chain deserve a fair and ethical workplace. Workers must be treated with the utmost dignity and respect, and Supplier must respect fundamental human rights.

HEALTH AND SAFETY: Supplier must provide its workers with a safe and healthy workplace. Aside from minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production, and worker retention and morale.

ENVIRONMENTAL PRACTICES: Supplier shall provide products and conduct business operations in a way that protects and sustains the environment, as defined by the Landis+Gyr Green Procurement Requirements, and at least in accordance with applicable laws and regulations.

ETHICS: Supplier must uphold the highest standards of integrity in all business interactions and have a zero-tolerance policy regarding any and all forms of unethical business practices.

MANAGEMENT SYSTEM: Supplier shall establish a management system designed to encourage compliance with this Code and applicable laws and regulations, to identify and mitigate related operational risks, and to facilitate continuous improvement.

I further acknowledge that each of our directors, workers, suppliers, agents, contractors, and temporary labor agencies directly supplying goods or services to Landis+Gyr has been made aware of this Code and is in compliance with the terms listed.

Lastly, I hereby give consent to Landis+Gyr to publish Supplier’s name in its Code Register, which I understand does not in any way imply approval, endorsement, warranty, certification, recommendation or engagement responsibility by Landis+Gyr.

Name:

Title:

Company name:

Company address:

.....

Signature:

Date:

¹ This document must be signed by an authorized representative of the company and returned to L+G within 20 days of receipt.



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Landis+Gyr

Supplier Code of Conduct

Changes since last Revision²

Revision	Date	Modified by	Remarks
2.0	28/01/2020	Stefania Varga	Introduction of new topics; language updated throughout all sections; overall reorganization of topics.
3.0	23/07/2020	Stefania Varga	Introduction of Section 8 (Information Security Practices).

² For internal use only.



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1. INTRODUCTION

Landis+Gyr AG (collectively with its affiliated companies “Landis+Gyr”) conducts its business in accordance with all applicable laws and regulations, and in accordance with the highest standards of business conduct and ethics. Landis+Gyr is also committed to sustainability, which includes respect for fundamental human and labor rights, as well as stringent health, safety, and environmental standards.

Landis+Gyr’s Code of Conduct for Suppliers (the “Code”) states the central principles, key policies, and procedures governing the cooperation between Landis+Gyr and each of its suppliers (“Supplier”). The Code ensures that Landis+Gyr conducts all of its procurement activities in accordance with the law, as well as with the principles of the [UN Global Compact](#) and of the [Responsible Business Alliance](#).

This Code may be amended from time to time. All updates will be published on the Landis+Gyr website, so it is recommended that Supplier checks back periodically for revisions.

2. SUPPLIER COMPLIANCE

Supplier must comply with all applicable laws and regulations in all locations where they conduct business. Supplier shall also establish procedures ensuring compliance with the Code. In case of conflict between standards outlined in laws and this Code, Supplier must comply with the strictest requirement.

As part of its Supplier compliance review, Landis+Gyr may require a signed representation from Supplier indicating receipt of the Code and compliance with its terms. As part of its Supplier audit program, Landis+Gyr may also inspect Supplier documentation and facilities.

Subject to any restriction imposed by law, Supplier will promptly and in writing inform Landis+Gyr representative(s) of any concern or non-conformance related to issues governed by this Code. In addition, concerns of misconduct potentially affecting Landis+Gyr can be reported via the SpeakUp System. Landis+Gyr policy prohibits retaliation against any person reporting such a concern in good faith.

Landis+Gyr undertakes due diligence and constantly monitors its Suppliers to ensure compliance with this Code. A Supplier’s failure to comply with this Code will be sufficient grounds for Landis+Gyr to terminate its business relationship with the Supplier, and may result in Supplier’s removal from the Landis+Gyr Supplier base.

3. SUPPLY CHAIN AWARENESS AND COMPLIANCE

Supplier must comply with this Code in all business dealings with Landis+Gyr. Supplier must also bind all its directors, workers, suppliers, agents, contractors, and temporary labor agencies directly supplying goods or services to Landis+Gyr to the principles and obligations of this Code.

4. EMPLOYMENT PRACTICES

Landis+Gyr believes all workers in our supply chain deserve a fair and ethical workplace. Workers must be treated with the utmost dignity and respect, and Supplier must respect fundamental human rights.



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4.1. CHILD LABOR

Landis+Gyr does not tolerate the use of child labor and will not engage a Supplier who uses any child labor in any of its facilities worldwide. Supplier must engage workers who meet the minimum age required to work in the country where the work is performed or who are over the age of 15, whichever is higher. Workers under the age of 18 must not perform hazardous work or operate heavy machinery.

Landis+Gyr supports the development of legitimate workplace apprenticeship programs for the educational benefit of young people, so long as the same comply with all applicable laws and with this Code. In the absence of local law, the wage rate for student workers, interns and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks.

4.2. MODERN SLAVERY

As a global industry leader in the manufacture of electricity, gas, and water metering solutions, Landis+Gyr has a responsibility to diligently combat slavery and human trafficking worldwide. As such, Landis+Gyr is committed to preventing slavery and human trafficking in its corporate activities, as well as combating modern slavery in its supply chain.

The term “modern slavery” can be defined by reference to existing criminal offences such as slavery and its related offences, including forced labor, deceptive recruiting for labor or services, forced marriage, debt bondage, human trafficking, organ trafficking, and the worst forms of child labor. The latter includes forced or compulsory recruitment of children for use in armed conflict, child prostitution, use of children for illicit activities, and work which is likely to harm the health, safety or morals of children.

Supplier must not traffic workers or in any other way exploit workers by means of threat, force, coercion, abduction, or fraud. Supplier must not use forced labor—slave, prison, indentured, bonded, or otherwise—in any of its facilities worldwide. Working must be voluntary, and workers must be free to leave work and to terminate their employment status with reasonable notice. Supplier must not require workers to surrender government issued identification, passports, or work permits as a condition of employment.

4.3. DISCIPLINARY PRACTICES

Supplier must not engage in or permit physical, verbal, or psychological abuse or coercion as a means of discipline or control. This includes threats of violence, harassment, or unreasonable restrictions on entering or exiting work and residential facilities (where the latter is provided by Supplier).

4.4. WORKING HOURS

Supplier must ensure working hours, including the number of hours and days worked, are not to exceed the maximum set by applicable local laws and regulations. In the absence of local law, a workweek shall not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off every seven days.



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4.5. WAGES AND BENEFITS

Supplier must compensate its workers fairly, in compliance with all applicable laws and regulations relating to minimum wages, overtime hours, and other legally mandated benefits (e.g., paid time off, social security contributions, etc.).

Supplier may never deduct or threaten deduction from wages as a disciplinary measure. For each pay period, Supplier shall provide workers with a timely and understandable wage statement that includes sufficient information to verify the accuracy of compensation versus the work performed.

All use of temporary, dispatch, and outsourced labor will be within the limits of the local law.

4.6. NON-DISCRIMINATION

Landis+Gyr does not tolerate discrimination of any kind—including race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information, or marital status—in hiring and employment practices such as wages, promotions, rewards, and access to training.

4.7. FREEDOM OF ASSOCIATION

Supplier must respect the rights of workers to associate freely, join workers' organizations, seek representation, bargain collectively, engage in peaceful assembly, or refrain from any such activities, as permitted by and in accordance with applicable laws and regulations. Supplier shall ensure workers can engage in such acts without fear of discrimination, reprisal, intimidation or harassment.

4.8. HARASSMENT

Supplier must operate a zero-tolerance policy for any form of harassment—including sexual harassment—in the workplace, treat all incidents seriously, promptly investigate all allegations of harassment, and fairly and adequately impose disciplinary action up to and including dismissal from employment.

5. HEALTH AND SAFETY

Supplier must provide its workers with a safe and healthy workplace. Aside from minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production, and worker retention and morale.

5.1. EXPOSURE TO HAZARDS

Supplier shall identify, evaluate, and control worker exposure to any hazards, in particular hazardous chemical, biological, and physical agents. Potential hazards are to be eliminated or controlled through proper design, engineering, and administrative controls, safe work procedures, or preventative maintenance. When hazards cannot be adequately controlled by such means, workers are to be provided with and use appropriate, well-maintained, personal protective equipment.

Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing, and highly repetitive or forceful assembly tasks is to be



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identified, evaluated and controlled. Workers must have the right to refuse unsafe working conditions without fear of reprisal until management adequately addresses their concerns.

Supplier must also implement a regular machinery maintenance program. Production and other machinery must be routinely evaluated for safety hazards.

5.2. EMERGENCY PREPAREDNESS

Supplier shall identify and plan for potential emergency situations, as well as implement and train their workers on response systems.

5.3. OCCUPATIONAL INJURY AND ILLNESS

Procedures and systems are to be in place to prevent, manage, track, and report occupational injury and illness including provisions to: encourage worker reporting; classify and record injury and illness cases; provide reasonable medical treatment; investigate cases and implement corrective actions to eliminate their causes; and facilitate return of workers to work.

5.4. SANITATION, FOOD, AND HOUSING

Workers must be provided with reasonable access to clean toilet facilities and potable drinking water. If Supplier provides a canteen or other food accommodations, they shall include sanitary food preparation, storage, and eating accommodations. If Supplier provides residential facilities for their workers, they shall provide clean and safe accommodations. In such residential facilities, workers shall be provided with emergency egresses, reasonable and secure personal space, entry and exit privileges, reasonable access to hot water for bathing, adequate heat and ventilation, and reasonable transportation to and from work facilities (if not reasonably accessible by walking).

5.5. HEALTH AND SAFETY COMMUNICATION

Supplier shall ensure that workers receive appropriate workplace health and safety information and training, including written health and safety information, and warnings in the primary language of its workers.

5.6. PERMITS AND REPORTING

Supplier shall obtain, keep current, and comply with all required health and safety permits, and follow applicable operational and reporting requirements.

6. ENVIRONMENTAL PRACTICES

Supplier shall provide products and conduct business operations in a way that protects and sustains the environment, as defined by the Landis+Gyr Green Procurement Requirements, and at least in accordance with applicable laws and regulations.

6.1. ENERGY MANAGEMENT

Supplier shall implement a systematic approach to conserve energy consumption and to reduce the related environmental, economic and energy supply security impacts. Where possible without



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compromising environmental conditions for product manufacture or supply, Supplier shall implement cost-effective methods for improving energy efficiency and minimizing energy consumption.

6.2. WATER MANAGEMENT

Supplier shall implement a systematic approach to identify, control, and reduce wastewater produced by its operations, as well as to prevent the contamination of stormwater runoff.

6.3. WASTE MANAGEMENT

Supplier shall implement a systematic and sustainable approach to identify, manage, reduce, and responsibly dispose of or recycle hazardous and non-hazardous waste.

Supplier must comply with all applicable laws and regulations regarding the labelling, recycling, and disposal of chemicals and materials, especially those materials designated as hazardous waste. Hazardous waste refers to any substance or object that Supplier discards or intends or is required to discard, and that displays one or more of the following properties: explosive, oxidizing, irritant (can cause skin irritation and eye damage), toxic, carcinogenic, corrosive, infectious, toxic for reproduction, sensitizing.

6.4. EMISSIONS AND POLLUTION PREVENTION

Supplier must endeavor to reduce or eliminate waste of all types by implementing appropriate conservation measures in its facilities, in its maintenance and production processes, and by recycling, re-using, or substituting materials. Emissions and discharges of pollutants and generation of waste are to be minimized or, where possible, eliminated at the source.

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, routinely monitored, controlled and treated as required prior to discharge. Supplier shall conduct routine monitoring of the performance of its air emission control systems.

6.5. NO ADVERSE EFFECTS ON THE LOCAL COMMUNITY

Supplier shall conserve the use of natural resources, including water, fossil fuels, minerals and virgin forest products, and protect the communities and environment that surround its facilities. Where conservation is impossible, the Supplier shall consider alternative practices such as modifying production, updating maintenance and facility processes, materials substitution, re-use, conservation, recycling or other means.

6.6. ENVIRONMENTAL PERMITS AND REPORTING

Supplier must obtain and keep current all required environmental permits, approvals, and registrations, and comply with applicable operational and reporting requirements.

6.7. MATERIAL RESTRICTIONS

Supplier must adhere to all applicable laws, regulations, and customer requirements regarding prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.



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To avoid the direct or indirect financing of armed groups that are perpetrators of serious human rights abuses, Supplier must adopt policies and establish systems to procure cobalt, tantalum, tin, tungsten, and gold from sources that have been verified as conflict free. Supplier must undertake due diligence procedures to ensure that such policies are being complied with and must make any such due diligence measures available to customers upon request.

7. ETHICS

Supplier is expected to uphold the highest standards of integrity in all business interactions and to have a zero-tolerance policy regarding any and all forms of unethical business practices.

7.1. FAIR BUSINESS, ADVERTISING, AND COMPETITION

Supplier must uphold fair business standards in advertising, sales and competition.

7.2. NO IMPROPER ADVANTAGE

Corruption, extortion, embezzlement and/or grant of unlawful or unethical benefits, in any form or manner, are strictly prohibited. Supplier may not offer or accept bribes or other means of obtaining undue or improper advantage. This prohibition covers promising, offering, authorizing, giving, or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Monitoring and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

7.3. DISCLOSURE OF INFORMATION

All business dealings should be transparently performed and accurately reflected on Supplier's business books and records. Information regarding participant labor, health and safety, environmental practices, business activities, structure, financial situation, and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable and may result in the termination of the business relationship.

7.4. PROTECTION OF IDENTITY AND NON-RETALIATION

Supplier must provide an anonymous complaint mechanism for managers and workers to report workplace grievances, and protect whistleblower confidentiality where permitted by law. Supplier must prohibit retaliation where a complaint is made in good faith. Further, Supplier's workers must be free to voice their concerns to Landis+Gyr or its auditors, and allowed to participate in the Landis+Gyr audit process without fear of retaliation.

7.5. INTELLECTUAL PROPERTY

Supplier is expected to respect intellectual property rights and safeguard customer information. Supplier must therefore manage technology and process information in a manner that protects intellectual property rights.



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7.6. PRIVACY

Supplier agrees to obtain, process, transfer, and store personal data in compliance with applicable data protection laws and in such a way that the same is protected from third party infringement and/or improper use. Such personal data may not be disclosed without informed consent from the data subject, except as dictated by applicable local laws.

8. INFORMATION SECURITY PRACTICES

At Landis+Gyr, we aspire towards the best in class information security standards for all company, customer, supplier and partner information. Therefore, Supplier must comply with all security laws of the locations where Supplier operates, as well as with specific contractual obligations agreed upon with Landis+Gyr.

8.1. Security Governance

Supplier must have clearly defined organizational IT/information security roles, responsibilities and accountabilities. Supplier must also publish and maintain formal written information security policies, protocols, and processes.

8.2. Training

Everyone in the company has a role to play in protecting and securing information. Therefore, Supplier (1) shall perform yearly information security awareness training for all their employees, (2) shall regularly and periodically train directors, workers, agents, contractors, and others who have access to the Information Technology infrastructure or relevant information systems and, (3) where applicable, must provide specific information security training related to its contractual provisions with Landis+Gyr.

8.3. Monitoring Approach

To monitor its Information Security governance, policies, and procedures, Landis+Gyr may require Supplier to perform a self-assessment regarding its compliance with the standards and regulations for privacy and information security. Supplier may also be audited by Landis+Gyr for the purpose of verifying Supplier data security systems and procedures are undertaken in accordance with this Code.

To the extent permitted by law and subject to applicable regulatory restrictions, Supplier shall provide Landis+Gyr, upon written request, with supporting documentation pertaining to the Supplier's Information Security Practices, as outlined in this section.

8.4. Intrusion Detection and Response

Supplier will implement appropriate technical and organizational security measures, in line with industry best practices, to protect against any unauthorized or unlawful processing of all Landis+Gyr data held by Supplier, and against accidental loss, destruction, alternation, disclosure or damage to Landis+Gyr data.

Supplier must maintain policies and procedures to detect, monitor, document and respond to actual or reasonably suspected unauthorized information disclosures, and encourage the reporting of such incidents. Supplier must immediately inform Landis+Gyr's Chief Information Security Officer (e.g., through



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the company's public internet presence) of any known or suspected breach of its information, or that of a Landis+Gyr customer, partner or another supplier was disclosed.

8.5. Business Continuity and Disaster Recovery

Supplier agrees to maintain and annually test Business Continuity and Disaster Recovery plans in support of contract deliverables.

9. MANAGEMENT SYSTEM

Supplier shall establish a management system designed to encourage compliance with this Code and applicable laws and regulations, to identify and mitigate related operational risks, and to facilitate continuous improvement.

9.1. COMPANY COMMITMENT

Supplier shall develop a corporate social, ethical, and environmental responsibility statement affirming the Supplier's commitment to compliance and continual improvement.

9.2. MANAGEMENT ACCOUNTABILITY AND RESPONSIBILITY

Supplier shall clearly identify the company representatives responsible for ensuring implementation and periodic review of the status of the Supplier's management systems.

9.3. LEGAL AND CUSTOMER REQUIREMENTS

Supplier must develop and implement a process to identify, monitor, and understand applicable laws and regulations, as well as the additional guidelines imposed by this Code.

9.4. RISK ASSESSMENT AND MANAGEMENT

Supplier must develop a process to identify environmental, health and safety, and labor practice risks associated with their operations, determine the relative significance of each risk, and implement appropriate procedures and controls to ensure regulatory compliance to control the identified risks. Risk assessments for health and safety must include warehouse and storage facilities, plant and facility support equipment, laboratories and test areas, bathrooms, kitchens, cafeterias.

9.5. IMPROVEMENT OBJECTIVES

Supplier shall develop written standards, performance objectives, targets, and implementation plans aimed at improving Supplier's social, ethical, and environmental performance, including a periodic assessment of Supplier's performance against those objectives.

9.6. COMMUNICATION AND TRAINING

Supplier must develop and implement a process for communicating clear and accurate information about its policies, practices, expectations and performance to workers, customers, and its own supply chain. Supplier shall also offer appropriate training programs for directors, managers and other workers to assist



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with the implementation of Supplier’s policies, procedures, and improvement objectives, as well as to meet applicable legal and regulatory requirements.

9.7. WORKER FEEDBACK AND PARTICIPATION

Supplier shall develop and implement an ongoing process to obtain feedback on processes and practices related to principles of this Code and to foster continuous improvement.

9.8. AUDITS AND ASSESSMENTS

Supplier shall undertake periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of this Code, and customer contractual requirements related to social and environmental responsibility. Supplier must provide a copy of such audit reports for inspection upon request from Landis+Gyr.

9.9. CORRECTIVE ACTION PROCESS

Supplier shall develop and implement a process for timely detection and adjustment of any deficiencies identified by an internal or external audit, assessment, inspection, investigation or review.

9.10. DOCUMENTATION AND RECORDS

Supplier shall create and maintain documentary records in such a manner so as to ensure regulatory compliance and conformity with the principles of this Code.