

LANDIS+GYR AUSTRALIA – JOINT MODERN SLAVERY STATEMENT 2024

1. Introduction and scope

This Joint Modern Slavery Statement is made by Landis & Gyr Pty Ltd in accordance with the Modern Slavery Act 2018 (Cth) (Australia) and applies to the operations of Landis & Gyr Holdings Pty Ltd (ACN 098 539587), Bayard Metering Pty Ltd (ACN 105 787 399) and Landis & Gyr Pty Ltd (ACN 002 894 224) (together, **Landis+Gyr Australia, our, we**) during our financial year 1 April 2023 to 31 March 2024.

In this statement, we outline our processes for assessing, preventing, and addressing modern slavery risks in our business operations and supply chains.

In preparing this statement, we have consulted with our key business leaders across the Landis+Gyr Group supply chain teams, procurement teams, operations and human resources teams, compliance and legal teams, the Asia Pacific business teams, and the Board of Directors of each of the three reporting entities.

2. Landis+Gyr Group

Landis+Gyr Australia 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.

The Landis+Gyr Group is a leading global provider of integrated energy management solutions for the utility sector. Offering one of the broadest portfolios, the Landis+Gyr Group delivers innovative and flexible solutions to help utilities solve their complex challenges in Smart Metering, Grid Edge Intelligence and Smart Infrastructure.

The Landis+Gyr Group designs, manufactures, and supplies a broad portfolio of products for the energy industry, including smart meters for electricity, heat, gas, and water, together with energy management solutions such as demand side management solutions, advanced sensing and automation tools, EV hardware and software charging solutions, cybersecurity solutions and data analytics.

Our products and services help drive positive and sustainable environmental outcomes, by enabling better energy infrastructure management, which in turn improves energy efficiency, energy conservation and decarbonisation.

The Landis+Gyr Group operates to high standards of ethical conduct, and environmental, social and corporate governance (ESG). Our leaders, managers, and employees also are expected to conduct themselves with the highest level of ethics and integrity by complying with our Code of Business Ethics and Conduct, Company policies, Company rules and by reporting any misconducts.

3. Organisational structure and operations

Landis+Gyr Australia is led by Mr. David Maclean, the Senior Vice President for Landis+Gyr Asia Pacific effective 1st October 2023, reporting to the CEO, Werner Lieberherr, of the Landis+Gyr Group. Landis+Gyr Australia employs 137 employees in Australia, with a further 25 working in New Zealand.

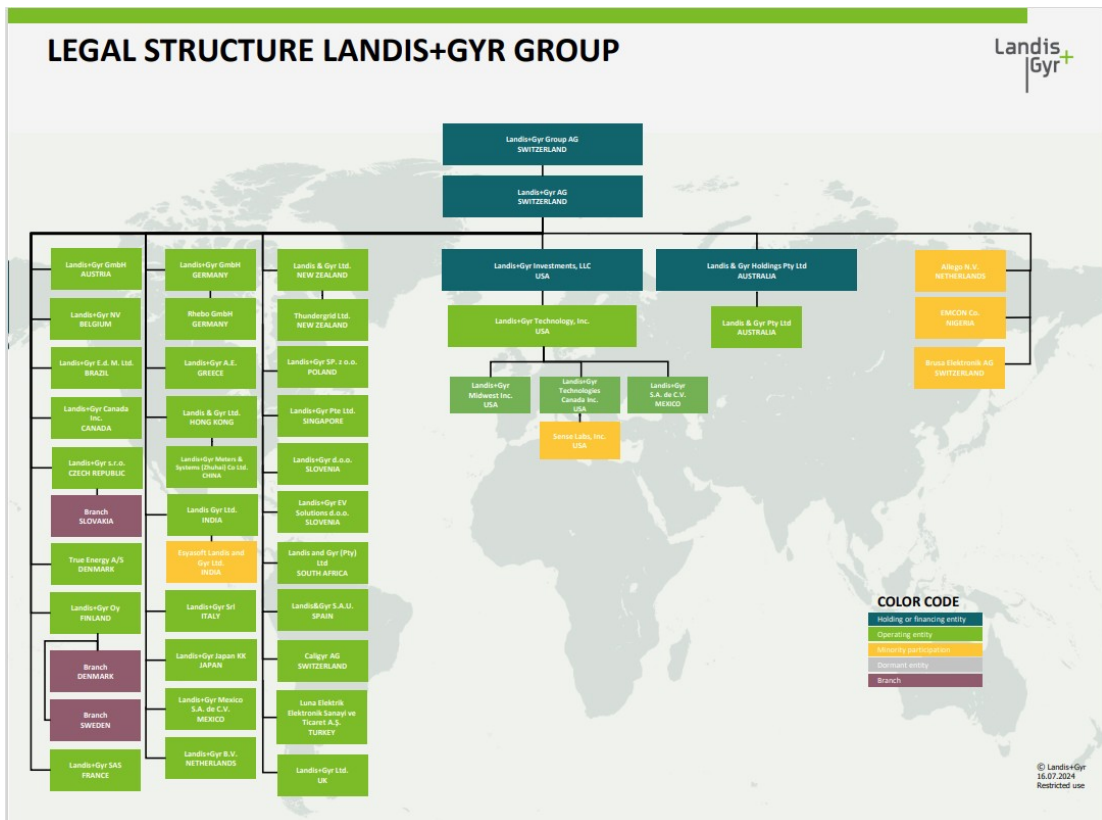
The Landis+Gyr Australia operations include manufacturing, supply chain management, research and development (R&D), product and service management together with sales and after-sales support.

The core products and services supplied by Landis+Gyr Australia to its customers include gas, electricity and water metering products, demand side management tools, software, energy management solutions and related support services.

We operate from four locations across Australia including Brisbane, Sydney, Perth, and Melbourne. Our Australian and Asia Pacific head office is located in Sydney, together with our R&D centre, where our team of engineers work on the hardware design and testing of electricity meters, and software solutions for multi-utilities including electricity, gas and water. Our main manufacturing facilities are located in Melbourne, where our staff carry out assembly, testing, calibration, configuration and certification work for a suite of Landis+Gyr water, gas and electricity meters.

Our operations are certified to the following ISO standards: ISO9001 (“Quality Certification”), ISO45001 (“OH&S Management system”), ISO14001 (“Environmental”), ISO17025 (“Testing and calibration laboratories”, in the context of our Zhuhai and Laverton entities) and recently ISO22301 (“Business continuity”).

Landis & Gyr Holdings Pty Australia is the direct subsidiary of Landis+Gyr AG (Switzerland), which is a direct subsidiary of Landis+ Gyr Group AG (Switzerland). Landis & Gyr Holdings P/L Australia is the holding company for Bayard Metering P/L Australia and Landis & Gyr Pty Australia.

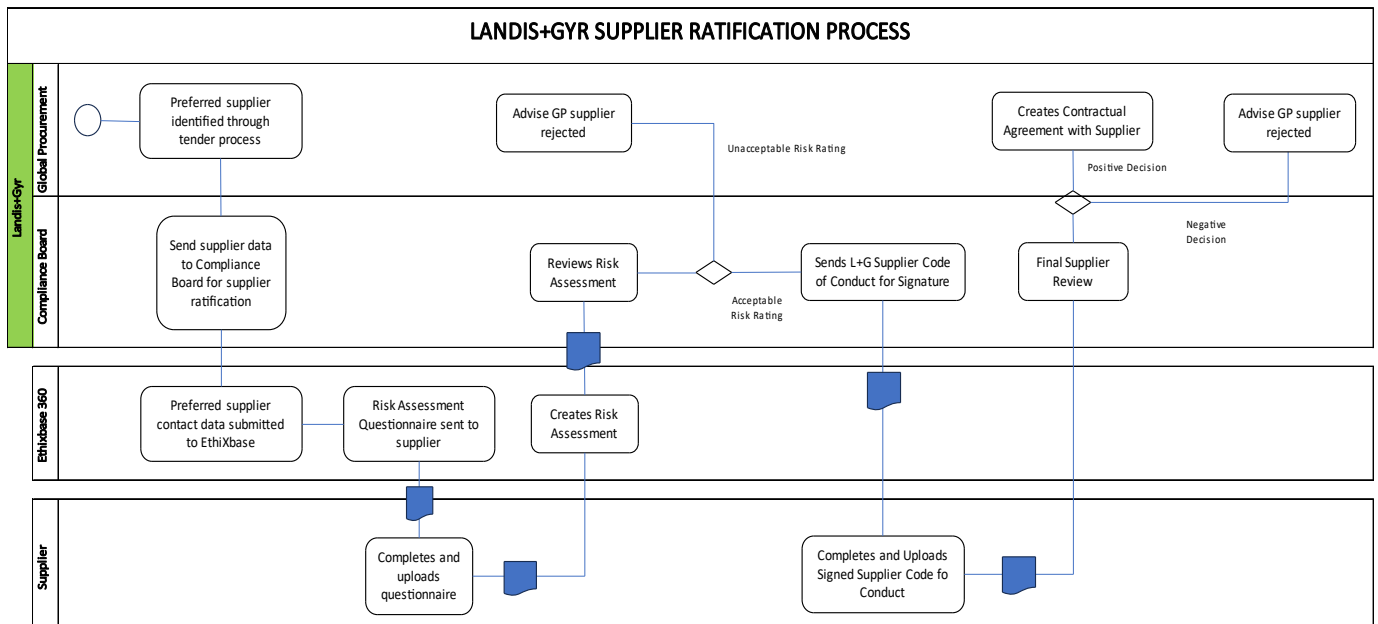


4. Supply Chains

Our supply chains are diverse, consisting of a mixture of components, sub-assemblies, metering components, and finished goods, relating to our gas, electricity and water meter products and solutions.

We source most of our direct materials (such as component parts and sub-assemblies) from suppliers in China, Vietnam, Europe, and the USA. We also source various products and services from within the Landis+Gyr Group, for example IT software and solutions from our affiliates in the USA and India, and various meter products and sub-assemblies manufactured by our affiliates in Germany and China. Our supply chains also include the provision of office services and supplies, such as cleaning and IT equipment.

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:



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 ESG Supplier Due Diligence 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.

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.

5. Risks of modern slavery

We recognise the significant global challenge associated with modern slavery and the inherent risks of modern slavery in supply chains.

Our internal processes and procedures in running Supplier Due Diligence are based on the RBA and reference the Universal Declaration of Human Rights, ILO International Labour Standards, OECD Guidelines for Multinational Enterprises, and various ISO standards.

Based on internal processes and procedures, ongoing supplier due diligence and risk assessments based on our risk methodology, as well as other factors such as geographic, sector and product specific factors, we have identified the risk of Modern Slavery across Asia Pacific business, including Australia, as low.

6. Policies and procedures to identify and manage modern slavery risks

The Landis+Gyr Group has implemented detailed policies such as Landis+Gyr Supplier Code of Business Ethics and Conduct; a copy of the policy Code may be viewed at:

<https://www.landisgyr.com.au/about/corporate-social-responsibility/>

Processes and procedures exist to help identify and manage the risks of modern slavery both within our own business operations and within our supply chains. When Landis+Gyr is considering the engagement of third-party suppliers, as a prerequisite for doing business with Landis+Gyr, we will conduct reasonable due diligence to assess and evaluate any potential modern slavery, anti-corruption concerns or issues. The due diligence process is critical to detect red flags and resolve them appropriately before moving forward with any supplier. Further to the process outlined above, an annual supplier Risk Assessment is undertaken by our external partner (Ethixbase) to ensure that ongoing due diligence is maintained for all suppliers.

Should Landis+Gyr become aware of any supplier which is non-compliant with applicable obligations, this matter will be reported to the Compliance Board for consideration and determination of next steps, which may include termination of all services.

Landis+Gyr Group Employee Code of Business Ethics and Conduct

The Landis+Gyr Group Employee Code of Business Ethics and Conduct is a cornerstone document within our business. It guides our internal employment processes and helps to ensure fair work standards for all employees. The code applies to all employees and workers across the 30 countries in which the Landis+Gyr Group operates. The code requires us to ensure that:

- ✓ employees are free to choose their employment and are not forced into any involuntary labour,
- ✓ employees have freedom of association and freedom to join trade unions,
- ✓ employees receive wages and benefits in compliance with local labour law requirements
- ✓ there is no unlawful harassment or workplace discrimination,

- ✓ there is no harsh or inhumane treatment within the workplace, and
- ✓ we never use child labour in any operations or at any stage of the manufacturing process

Corporate Social Responsibility 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).

Landis+Gyr Group Speak Up 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 need to be reported or investigated.

Employment Equity Discrimination Harassment and Bullying Policy

As detailed in our Code of Business Ethics and Conduct, we are committed to providing a safe and healthy working environment for our workers, ensuring they feel valued and respected. This policy is designed to prevent discrimination, harassment, bullying and victimisation and enable workers to carry out their work in a safe environment.

Occupational Health and Safety policies

Our workplace health and safety policies help ensure that our business complies with its legal obligations under relevant workplace health and safety legislation and proactively seeks to reduce the risk of workplace accidents.

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 on site at over 50 supplier locations, including 17 in China and 2 in Vietnam. There were zero non-conformances identified related to modern slavery as an outcome of these audits.

Green Procurement Requirements

Landis+Gyr actively strives to prevent the use of Conflict Minerals within our products and requires that its suppliers and partners share this objective. Landis+Gyr has adopted the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

Suppliers are requested to design and implement a system for the thorough management of those materials, components and processes which may have negative environmental impact. A special focus lies on chemical substances in products, including the following actions:

- ✓ Establishment of a design approach to pursue resource sustainability (green design), for example: reduce material usage, design assemblies to be easily disassembled at end of life to maximise recyclability.
- ✓ Establishment of a system for identification and management of hazardous chemical substances in products.
- ✓ Procurement of parts, components, and materials with minimal environmental impacts, including a reduction in the use of hazardous chemical substances.

Landis+Gyr Group collects supplier declarations regarding compliance with our Conflict Minerals requirements, in accordance with a pre-defined plan as set out in the Green Procurement Annex to the Supplier Code of Conduct.

Employee Training Plan

In 2024, Landis+Gyr will continue to conduct mandatory modern slavery training programs for management, human resources, procurement, and supply chain personnel located in Australia and across Asia Pacific. 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 2022-2023 was completed in December 23 and will be reintroduced in November 2024.

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.

7. Assessing the Effectiveness of Actions Taken

Landis+Gyr continuously monitors the effectiveness of its efforts to address the risk of modern slavery in our business and supply chains. This includes:

- ✓ Recording employee training completion and following up with each individual employee where necessary to ensure full completion of obligatory training related to the Landis+Gyr Code of Business Ethics and Conduct;
- ✓ Recording supplier training completion and following up with each supplier to ensure adherence to the Supplier Code of Conduct;
- ✓ Raising awareness of modern slavery risks throughout the Landis+Gyr internal and external supply chain through associated facilitated workshops with employees on an annual basis;
- ✓ Internal audit monitoring of all 3rd party agreements (suppliers, distributors, agents) to ensure that contracts include provisions requiring adherence to the Landis+Gyr Code of Business Ethics and Conduct or their equivalent; as well as agreement to undertake associated training on an annual basis;
- ✓ Monitoring the above adherence through a weekly Compliance Board, where all new 3rd party supplier partnership proposals are reviewed (on a global basis), including the acceptance of the Landis+Gyr Supplier Code of Conduct, or a control of 3rd party equivalents; 3rd parties unwilling to agree to these terms are formally advised that we cannot conduct business with them;
- ✓ Reporting via the Landis+Gyr Ethics Committee and comprehensive documentation of all actual or alleged non-compliance incidents reported to the Company (either internally or by external third parties). Investigation is undertaken through trained compliance and audit professionals;
- ✓ Post-incident lessons learnt reviews are conducted with observations of continued process and policy improvement or training opportunities disseminated as part of Landis+Gyr's commitment to the continuous improvement of its ethics culture.

Approval

This statement was approved by principal governing body (being the board of directors) of each of the two reporting entities, namely Landis & Gyr Holdings Pty Ltd, and Landis & Gyr Pty Ltd. The board of directors of these 2 reporting entities approved this statement on 2 October 2024. Bayard Metering Pty Ltd was deregistered on 2 April 2024, therefore, it has not been practicable to obtain approval from its principal governing body

Signed by the following Responsible Members of the three reporting entities:



David Maclean

Position: Senior Vice President for Landis+Gyr Asia Pacific
SVP Asia Pacific, Landis+Gyr

Date: 02/10/2024

Johannes Godefridus Rijsssemus

Position: Director of Landis & Gyr Holdings Pty Ltd, and Landis & Gyr Pty Ltd
Chief Financial Officer, Asia Pacific, Landis+Gyr

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Date: 02/10/2024