Introduction

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Siemens Transmission and Distribution Limited (STDL) has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain. Modern slavery encompasses slavery, servitude, human trafficking and forced labour.

Sustainable value creation is the path we choose to achieve our goal of profit-driven, long-term growth. As a global business, Siemens with its innovative power and investment strength, assumes joint responsibility for worldwide sustainable development. We create added value for the societies, in which we operate. At the same time, our business activities – both directly and indirectly – impact the lives of many. Siemens is aware of its responsibility for ensuring the respect of human rights. For us, this responsibility is a core element of responsible business conduct. Building on our Business Conduct Guidelines, we have defined the respect of human rights in additional guidelines and principles.

Sustainable practices are firmly anchored in our corporate culture, based on our company values of being responsible, excellent and innovative. We apply globally-binding principles that require all employees and managers to behave in an ethical, law-abiding manner. We act responsibly to support economic, environmental and social progress.

As part of the worldwide Siemens group of companies, STDL has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our business

Siemens is a global business focusing on the areas of electrification, automation and digitalisation and has been active in the United Kingdom for over 170 years. STDL is one of a number of Siemens legal entities trading in the UK, which operate in various industry sectors from power generation, transmission and distribution to smart grid solutions and the efficient application of electrical energy – as well as in the areas of rail services, automation and traffic solutions. Siemens in the UK employs over 14,000 staff, located in various locations including sales offices, manufacturing plants and warehouses.

Our high risk areas

Compliance risk management is an ongoing focus in all aspects of business activity and on an annual basis global risks are assessed in a Headquarter workshop, with key risk topics subsequently cascaded throughout the organisation to ensure proper management awareness and focus. This headquarter initiative is supplemented by a deep dive review undertaken by local business management in the
• potential Human Rights violations are subject to investigation as part of the formal compliance case handling process;
• training modules incorporate key aspects of Human Rights compliance.

3. Whistleblower Policy:

Siemens has a compliance whistleblower hotline for reporting compliance violations in a secure manner, 24 hours a day, 7 days a week, in 13 languages, online or via telephone. Reports can also be made anonymously. The hotline can be used by employees and management as well as customers, suppliers and other stakeholders. It is managed by a third party supplier and all data supplied is maintained on secure servers in Germany. All reported content is handled exclusively by Siemens.

Siemens internal whistleblowers are protected by special regulations that protect whistleblowers who make good faith reports to the best of their knowledge. In addition, the Siemens Ombudsman is available for the reporting of compliance violations.

4. Recruitment Policy:

The company operates a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.

Our suppliers

According to the UN Global Compact, the “supply chain can make a significant impact in promoting human rights, fair labour practices, environmental progress and anti-corruption policies”.

Siemens globally has a substantial and complex supply chain with around 90,000 suppliers across 150 countries. With such a large and geographically dispersed supplier network, Siemens cannot maintain the same level of oversight for every supplier. However, Siemens has implemented a system of interconnected processes and tools to stay on top of this complexity under the governance of our Global Services Supply Chain Management function. Transparency and awareness of supply chain risks is ensured via a three step process:

• Definition of sustainability risks and categories;
• Identification of the relevant suppliers;
• Development and implementation of necessary procurement processes to cover these risks for example by conducting on-site audits.

We support our suppliers through our “Sustainability in the Supply Chain” and “Code of Conduct for Siemens Suppliers and Third Party Intermediaries” brochures, and the basis of all our supplier relationships is the commitment of our suppliers to observe the principles of the code. In addition, we explicitly encourage them to extend these values further into their own supply chain in order to create a network of interactions and business relations that are built on trust. As well as reflecting our Business Conduct Guidelines, our supplier code is based on the UN Global Compact and principles of the International Labour Organisation.

The code specifically prohibits the use of forced labour and child labour by our suppliers, requires our suppliers to respect the employment rights of their workers and requires our suppliers to use reasonable efforts to promote compliance with the code amongst their own.
Other information

Ensuring commitment to human rights at Siemens:
Sustainability in the Supply Chain:

Our commitment

STDL will not tolerate any violations of applicable law – and if it does happen, we will take strong action. We will continue to apply a zero tolerance approach to forced labour, slavery and human trafficking in any form, in our business and supply chain.

Approval for this statement

This statement was approved by the Board of Directors with respect to the Financial Year ending on 30th September 2018.

Carl Ennis (Director)

Date 11 Dec '18