

Air Products

Modern Slavery Statement 2024

This statement is published in accordance with Section 54 of The Modern Slavery Act 2015.

At Air Products, we are opposed to slavery, human trafficking and the use of forced labour of any kind, and we remain steadfast in our commitment to help eradicate modern slavery, both in the UK and around the world. We have established policies and processes in our businesses and supply chains in support of this position. This statement outlines the actions and activities we undertook in our Fiscal Year 2023 (which ended on the 30th of September 2023) to identify modern slavery within our operations and supply chain.

Air Products is a leader in the global industrial gas industry. Our goal is to ensure that Air Products will be the safest, most diverse and most profitable industrial gas company in the world, providing excellent service to our customers.

Our Global Business Overview



AIR PRODUCTS BY THE NUMBERS



Our Company has five business segments:

- Americas;
- Asia;
- Europe;
- Middle East and India; and
- Corporate and other.

The **regional industrial gases** segments produce and sell atmospheric gases, such as oxygen, nitrogen and argon; process gases, such as hydrogen, helium, carbon dioxide, carbon monoxide, and syngas (a mixture of hydrogen and carbon monoxide); and specialty gases. The regional segments distribute gases to customers through different supply modes according to customers' volume requirements and locations. The merchant gas supply mode delivers liquid or gaseous bulk supply by tanker or tube trailer and, for smaller customers, packaged gases in cylinders and dewars. The on-site supply mode serves large-volume customers with relatively constant demand through either an on-site plant on or near the customer's facility or one of the Company's pipelines.

The **Corporate and other** segment includes the Company's sale of equipment businesses. This segment sells cryogenic and gas processing equipment for air separation that is sold worldwide to customers in many industries, including chemical and petrochemical manufacturing, oil and gas recovery and processing, and steel and primary metals processing, as well as liquefied natural gas process technology and equipment, turbo machinery equipment and services, and distribution equipment, including membrane systems and cryogenic containers. The Corporate and other segment also includes costs to provide corporate support functions and global management activities that benefit all segments, including product development, research and development, and administrative support.

Our Organisation in the UK:

Air Products Group Limited is a wholly owned subsidiary of Air Products and Chemicals, Inc., a Delaware corporation, and is our UK group holding company.

Subsidiary companies of Air Products Group Limited include: Air Products PLC, Air Products (BR) Limited, Air Products Llanwern Limited, Air Products Equipment Limited, Cryoservice Limited, Gas Direct Limited, SIG Industrial Gases Ltd, Gas Direct Cymru Cyf, Air Products Renewable Energy Limited, Beer Gas Cymru Cyf (dissolved on 5th of September 2023) and M&M Gases Limited (dissolved on 5th of September 2023).

The Board of Directors of Air Products Group Limited has approved this statement on the ***.

Our UK Supply Chain

In the UK, Air Products sources from 40 countries and 32% of our supplier spend is with UK companies. Our key commodities include: energy, distribution services and equipment, equipment manufacturing, maintenance services and consumable materials.

Our Company is committed to improving visibility into both our domestic and international supply chains. We will continue to undertake projects in 2024 to understand the manufacturing and labour conditions of the materials and services supplied to Air Products.

Policies and Contractual Controls

At Air Products, we have implemented and reviewed policies and contractual controls within our organisation and supply chain to ensure employee and supplier awareness and promote the identification of malpractice.

Any concerns about Air Products can be reported through our whistleblowing line, [IntegrityLine](#). We encourage anyone, including all our business partners, to report, as allowed by local law, misconduct or ethics violations including modern slavery and forced labour. A link to our IntegrityLine is provided on our Purchase Orders. Our IntegrityLine is available in over 20 languages. For concerned employees, we offer our IntegrityLine and have a designated officer. We encourage our employees to report any concerns through the whistleblowing line and will support any employee who raises concerns, without fear of retaliation.

No incidents of modern slavery were reported through the IntegrityLine during FY23.

Our Company is committed to maintaining and enforcing a [Human Rights policy](#) which provides, among other things, that Air Products supports, encourages and values a diverse, multi-cultural workforce and is strictly opposed to the use of child labour or forced labour of any kind, including but not limited to slavery, indentured servitude, human trafficking and all other forms of forced labour. Our Company's Human Rights policy requires employees at all levels within the organisation to abide by the policy.

During our vendor onboarding process, Vendors agree to abide by Air Products' [Code of Conduct](#) in their dealings with Air Products and we share a link to the document which is available in 24 languages. Our Code of Conduct sets out the ethical actions and behaviours expected of our employees and board members, but also of our agents, consultants, contractors, distributors, joint venture partners, and other third parties with whom we have business relationships.

In 2023, Air Products developed a [Supplier Code of Conduct](#) that includes our expectations of suppliers regarding business conduct, environmental protection, and social responsibility. The Code is being incorporated into our global terms and conditions and contracts as they are renewed.

Our General Terms and Conditions of Purchase require our suppliers to abide by all laws, rules and regulations in effect in the countries and jurisdictions in which they do business, including

but not limited to all laws, rules and regulations relating to modern slavery and human trafficking. We incorporate in our Terms and Conditions a clause specific to Human Rights, requesting suppliers to abide by Air Products' Human Rights Policy and all applicable national laws and international treaties concerning human rights, labour rights, and human trafficking and slavery; suppliers are also requested to endeavour to prevent, mitigate, and account for the impacts of their activities in connection with the transactions they have with Air Products on the human rights of individuals directly or indirectly affected by their supply chains. Air Products members of the Procurement Department, in consultation with the Law Department, are trained to ensure that such clauses are included in contracts. We may also require our suppliers, vendors and contractors to demonstrate a commitment to Human Rights and an opposition to slavery and human trafficking by providing Air Products with a copy of their own Human Rights or Anti-Slavery/Human Trafficking policies.

Air Products' occasionally conducts audits and verifications of existing contractual agreements within the Supply Chain organization to ensure compliance with contractual terms, including but not limited to contractual terms relating to legal compliance. We generally do not hire third parties to conduct audits or verifications for such purposes, although we reserve the right to do so in appropriate circumstances. Audits are generally conducted upon 30 days advance notice.

Risk Assessment

We have completed human rights assessments for our operations and supply chains. We reviewed the potential for human rights issues, including child and forced labour, in the highest risk countries in which we operate and did not identify any significant risks. From a supply chain perspective, we examined human rights risks relative to procurement spend and supplier location using country-specific risk information from third parties. To further improve our process, we investigated and will implement a third-party solution to social and environmental risk classification for our supply chain, including but not limited to child and forced labour.

Due Diligence

As stated in our Human Rights policy, we are opposed to slavery, trafficking and forced labour of any kind. Our Human Resources activities, including recruitment processes and remuneration practices, are compliant with UK law.

We use a consistent, global process to evaluate potential risks of third-party intermediaries. The risk assessment considers the work being done, where the work will be performed, compensation amount and method, and the potential for interaction with government officials. For third-party intermediaries that represent medium or high risk, due diligence is completed and includes questions about vendors' policies addressing human rights awareness, education and training.

Our Supplier Code of Conduct declares that we expect our suppliers comply with all applicable human rights-related laws and regulations and not use or tolerate the use of slavery, human trafficking or forced or child labour of any kind.

Globally, new suppliers are screened against Sanctioned Party Lists to identify any party which would have been sanctioned for illegal acts, including but not limited to using forced labour, prior to entering into an agreement. For entities on our ERP System, automated screening continues to occur based on designated milestones.

Our Global Capital Procurement organisation includes in their supplier assessment questionnaires at vendor qualification stage questions relative to human rights. Our UK Procurement Operations organisation is implementing a new social and sustainability evaluation process based on criteria including but not limited to spend level and criticality of supply, which will include questions on modern slavery and child labour.

Effectiveness

We have a team from Procurement, HR and Supply Chain to uphold our procedures on modern slavery and sustainability.

Training

We have implemented awareness training on Modern Slavery and Human Trafficking aimed at employees whose roles are key in identifying and mitigating slavery and human trafficking risks.

In FY23, our UK Procurement Operations Organisation undertook a specific Child and Forced Labour Prevention Training. This training has been included as part of the onboarding for all future team members. To further train our teams, we will present to our Procurement Teams a case study on Modern Slavery case[s] in Europe.

Contact Us

Questions regarding Air Products' commitment to eradicate slavery and human trafficking, both within its own organization as well as within the organizations with whom Air Products does business, may be addressed to Sandrine De Oliveira for Europe or Julie O'Brien, Air Products' Sustainability Director.

Signed by **Ivo Bols**, President Europe and Africa



