

Air Products

Modern Slavery Statement 2022

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

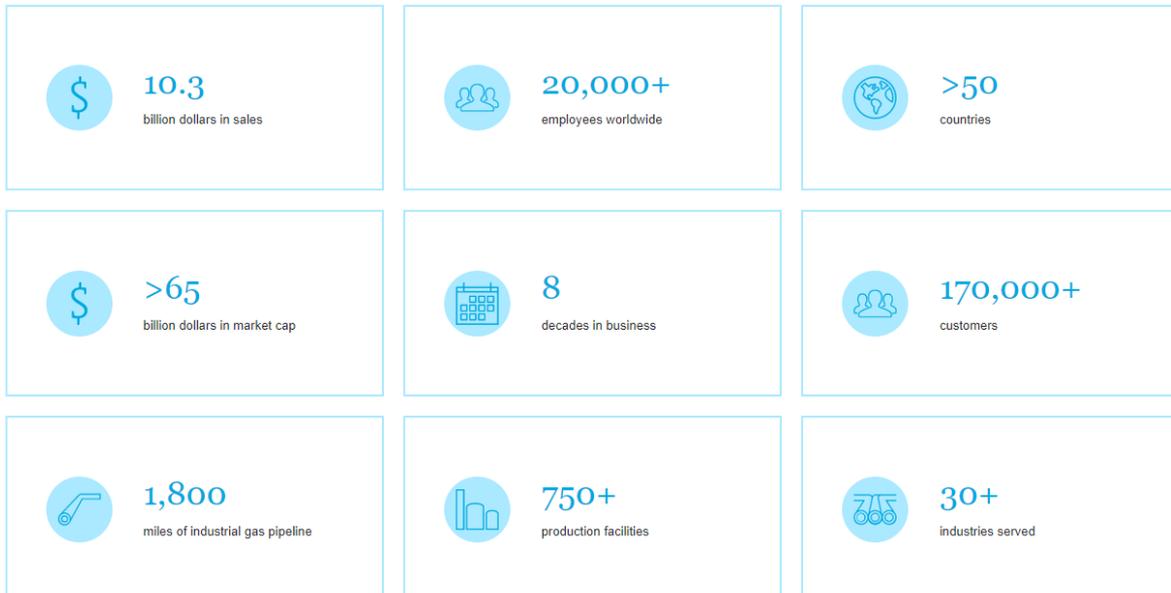
Air Products is opposed to slavery, human trafficking and the use of forced labour of any kind, and remains steadfast in our commitment to help eradicate modern slavery, both in the UK and around the world. The Company has established policies and processes in our businesses and supply chains in support of this position. This statement outlines the actions and activities Air Products undertook in our Fiscal Year 2021 (which ended on the 30th of September 2021) 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



The Company has three business segments:

- Regional Industrial Gases (Americas, EMEA, and Asia): produce and sell atmospheric gases such as oxygen, nitrogen, and argon (primarily recovered by the cryogenic

distillation of air) and process gases such as hydrogen, carbon monoxide, helium, syngas, and specialty gases.

- Industrial Gases – Global: includes activity related to the sale of cryogenic and gas processing equipment for air separation.
- Corporate and other segment: includes our liquefied natural gas (LNG) process technology and equipment, turbo machinery equipment and services, and distribution sale of equipment businesses, as well as corporate support functions that benefit all segments.

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 Ltd, Air Products Llanwern Ltd, Air Products Equipment Ltd, Cryoservice Ltd, Gas Direct Ltd, Dixons of Westerhope Ltd and Tanasio Industrial Gases cyf.

The Board of Directors of Air Products Group Limited has approved this statement on the 8th of March 2022.

Our UK Supply Chain

In the UK, Air Products sources from 39 countries and 73% of our supplier spend is with UK companies. Our key commodities include: energy, distribution services and equipment, equipment manufacturing, maintenance services and consumable materials.

The Company is committed to improving visibility into both our domestic and international supply chains. We will continue to undertake projects in 2022 to understand the manufacturing and labour conditions of the materials and services supplied to Air Products.

Policies and Contractual Controls

Air Products has 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](#). Air Products encourages 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. For concerned employees, Air Products offers our IntegrityLine and have a designated officer. Air Products encourages 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 FY21.

The 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. The 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 adhere to 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.

Air Products 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. Air Products members of the Procurement department, in consultation with the Law Department, are trained to ensure that such clauses are included in contracts. Air Products may also require its 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' Corporate Audit department 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. Air Products generally does not hire third parties to conduct audits or verifications for such purposes, although it reserves the right to do so in appropriate circumstances. Audits are generally conducted upon 30 days advance notice.

We will improve the accessibility to our UK Modern Slavery Statement by making it more prominent and easily available on our UK website.

Risk Assessment

From an operation perspective, 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 are investigating an improved process to monitor our higher risk suppliers with regards to Corporate Social Responsibility, including Modern Slavery.

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.

Air Products uses 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 [Expectation of Suppliers Statement](#) declares that we expect our suppliers not to practice any form of forced labour or modern slavery and to comply to UK Modern Slavery Act 2015 and other relevant legislation.

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 investigating an improved process for evaluating suppliers on human rights and modern slavery.

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.

We plan to raise awareness through our Management Newsletters around Modern Slavery and Human Trafficking in Supply Chain to all employees, and how they can report any concern of violation.

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

03/17/2022

Ivo Bols