



## NIPPON SANSO UK LIMITED

### MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

#### INTRODUCTION

Nippon Sanso UK Limited and Nippon Sanso Offshore Limited (together, for the purposes of this statement, “**NS UK**”) are committed to respecting and safeguarding human rights wherever we operate. Modern slavery is a crime and a serious violation of fundamental human rights. It can take various forms, including slavery, servitude, forced or compulsory labour, and human trafficking, all of which involve the exploitation of individuals and the deprivation of personal liberty for personal or commercial gain.

NS UK is committed to the continuous improvement of its practices to prevent modern slavery and human trafficking within its own operations and its supply chains, as far as it is able. This statement is made pursuant to section 54(1) of the United Kingdom Modern Slavery Act 2015 and sets out the steps taken during the financial year ending 31 March 2026.

This statement also reflects relevant developments since our previous statement and outlines the measures we have in place to identify, assess and mitigate the risk of modern slavery and human trafficking across our business and supply chain. We comply with all applicable national laws and align our approach with internationally recognised human rights standards, including the Universal Declaration of Human Rights and the International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work.

#### OUR BUSINESS

Nippon Sanso UK Limited is engaged in the production and sale of carbon dioxide (CO<sub>2</sub>), supplied both as a compressed gas and as a solid material (dry ice). These products support a wide range of industries, including food and beverage, chemicals, agriculture, transport and blast cleaning.

Nippon Sanso Offshore Limited is primarily engaged in the production and supply of helium and other compressed gas mixtures, together with the provision of rental assets for use within the offshore energy sector. Products are typically supplied in high-pressure cylinders and are used for activities such as diving, welding and testing.

NS UK’s principal operations and manufacturing activities are located in the United Kingdom, Ireland, Norway and the Netherlands.



## **POLICIES AND GOVERNANCE**

NS UK maintains a suite of corporate policies that support our commitment to ethical business conduct and the protection of human rights, including policies addressing human rights, supplier conduct, whistleblowing and business integrity. These policies set clear expectations for employees, suppliers and business partners and expressly prohibit all forms of forced labour, child labour and human trafficking.

Responsibility for oversight of modern slavery risk sits with senior management, supported by the compliance function. This statement and the effectiveness of relevant controls are reviewed annually, with material risks or findings escalated as appropriate. The statement is approved at Board level.

## **MODERN SLAVERY RISK ASSESSMENT**

NS UK undertakes periodic assessments of the potential risk of modern slavery and human trafficking within its operations and supply chains. These assessments take into account factors such as geographic location, sector-specific risk, labour models used, and the nature of goods and services procured.

While the majority of NS UK's activities are based in jurisdictions generally assessed as lower risk, we recognise that certain areas present inherent elevated risk, including:

- the use of third-party labour providers and contractors;
- logistics, transport and on-site services;
- offshore and maritime activities; and
- the procurement of goods or services involving overseas manufacturing or processing.

These risks are managed through a risk-based and proportionate framework of due diligence measures, contractual controls, training and ongoing monitoring.

## **SUPPLY CHAINS AND DUE DILIGENCE**

NS UK is committed to conducting business in accordance with applicable laws and high standards of integrity. Our approach to supplier due diligence focuses on identifying and mitigating modern slavery risk in a proportionate manner.

Key elements of our approach include:

- vetting suppliers and contractors prior to engagement, with enhanced scrutiny applied to higher-risk relationships;



- requiring suppliers to comply with our Code of Conduct and Human Rights Policy, or to demonstrate equivalent standards through their own policies;
- incorporating anti-slavery and human trafficking provisions, warranties and audit rights into supplier contracts; and
- periodic audits and reviews of strategic and higher-risk suppliers.

NS UK has been a full member of SEDEX for several years and uses the platform to support supply chain transparency and responsible sourcing practices.

Where concerns are identified, we seek to work constructively with suppliers to address and remediate issues. Persistent failure to address material concerns may result in disengagement.

NS UK uses agency workers only through reputable employment agencies that are expected to adhere to applicable anti-slavery and human trafficking requirements.

### **EFFECTIVENESS AND PERFORMANCE MONITORING**

NS UK continually monitors the effectiveness of its approach to identifying and mitigating the risk of modern slavery and human trafficking.

During the reporting period, no substantiated incidents of modern slavery or human trafficking were identified within NS UK's operations or supply chains. This does not remove the underlying risk, and we remain vigilant and committed to continuous improvement.

To support ongoing evaluation, NS UK monitors a range of indicators, including:

- completion of risk-based due diligence for new and strategic suppliers;
- audit findings and remediation actions;
- whistleblowing reports and response outcomes; and
- training completion rates.

Performance and emerging risks inform the ongoing development of our controls and procedures.

### **WHISTLEBLOWING AND REPORTING**

NS UK has systems in place to encourage the reporting of concerns and takes the protection of whistleblowers seriously. Employees are expected to report concerns through



management, appropriate internal channels or the confidential Nippon Sanso Integrity Hotline. Third parties may also raise concerns through this channel.

All reports are assessed and investigated as appropriate. NS UK is committed to reviewing and closing all reports raised through the Integrity Hotline.

### **TRAINING AND AWARENESS**

NS UK provides training to ensure that relevant employees understand the risks of modern slavery and human trafficking and their role in identifying and addressing those risks.

Employees in customer-facing roles are required to undertake periodic re-certification covering the Code of Conduct, including modern slavery-related topics. Training content is reviewed periodically to ensure it remains relevant and effective.

### **CONTINUOUS IMPROVEMENT AND FUTURE ACTIONS**

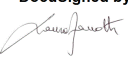
NS UK recognises that addressing modern slavery risk requires ongoing effort. During the coming financial year, we will continue to refine and strengthen our processes, with a focus on:

- enhancing supply chain transparency and risk assessment;
- maintaining effective whistleblowing and investigation processes;
- ensuring appropriate modern slavery training completion; and
- reviewing supplier audit outcomes and remediation measures.

These actions support our commitment to preventing modern slavery and human trafficking across our business and supply chains.

### **APPROVAL**

This statement was approved by the Board of Directors of Nippon Sanso UK Limited and Nippon Sanso Offshore Limited and is signed on their behalf by:

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Laura Zanotti – Director of Nippon Sanso UK Limited and Nippon Sanso Offshore Limited

Dated 10<sup>th</sup> April 2026