

NIPPON GASES UK LIMITED

MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

INTRODUCTION

Nippon Gases UK Limited and Nippon Gases Offshore Limited (for the purposes of this statement “NG UK”) are committed to the recognition and safeguarding of human rights in all the countries where they operate. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain.

NG UK is committed to the continuous improvement of its practices to combat slavery and human trafficking, as far as it is able, within in its own operations and supply chains. In support of this commitment and pursuant to section 54(1) of the Modern Slavery Act 2015, this statement sets out the steps taken to combat slavery and human trafficking during the financial year ending 31st March 2023. It highlights relevant changes made since the publication of our last statement as well as detailing any policies or programs that have been established to identify the risks of modern slavery, ensure that slavery or related human trafficking does not take place across our business or within our supply chain and to continue to safeguard the individuals who work for us. We comply with all applicable national laws and international treaties concerning human rights, social rights, labour rights and are consistent with the principles of the Universal Declaration of Human Rights and referenced elements of the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work.

OUR BUSINESS

Nippon Gases UK is based on the production and sales of carbon dioxide (CO₂), as a compressed gas and as a solid material (dry ice). These products are used in various industries such as food and beverage, chemical industry, agricultural industry, transport and blast cleaning.

Nippon Gases Offshore is based primarily on production and sales of helium and other compressed gas mixes and, additionally, the supply of rental assets for use within the offshore energy industry. Typically sold in 200 & 300 bar cylinders in multiple configurations and

concentrations of gas, these products are used for various activities such as diving, welding, and testing.

NG UK's main operations and manufacturing activities take place in the UK, Norway, Netherlands and Ireland.

SUPPLY CHAINS AND DUE DILIGENCE

NG UK is committed to compliance with laws and to upholding its strong standards of business integrity and related corporate policies, including those directed towards our suppliers and supply chain. These policies reflect our dedication to ensuring the absence of forced labour and child labour in our supply chain. We recognise the need to ensure that we actively enforce the principles of these policies. We therefore have in place a compliance team who keep these policies under review and are able to discuss any concerns raised and take the steps necessary to eradicate issues.

When reviewing our policies and procedures we recognise the need to utilise codes of practice and engage with other organisations. We have been full members of SEDEX for 6 years; SEDEX is a membership organisation that provides one of the world's leading online platforms for companies to manage and improve working conditions in global supply chains.

We understand the need to ensure that our commitment is reflected through our supply chain and ensure all sourcing associates and managers receive regular training on our supplier expectations and our human rights policy. To help identify and monitor the risk of slavery and human trafficking in our supply chain we vet suppliers and sub-contractors to ensure that they are committed to ethical labour practices. In addition we include anti-slavery and human trafficking provisions within all our contracts.

Suppliers, vendors and contractors must also agree to abide by our Code of Conduct and our Human Rights' policy or demonstrate a commitment to Human Rights via their own policies. Our supplier agreements routinely include language that require our suppliers to obey international, national and regional statutory requirements in the countries where they operate. This includes any applicable international and national laws regarding human trafficking, forced labour and other forms of modern slavery.

Our executive management team continues to communicate with our top-tier suppliers annually to reinforce our commitment to our policies and to remind suppliers of their obligations in contracting with us. In particular, our executives reaffirm that we expect business dealings

with suppliers to be based on fairness, honesty, lawfulness, safety, environmental stewardship and social consciousness. In addition to communicating with these suppliers we also undertake audits of our top-tier suppliers' part of which checks their compliance with our policies. We are pleased to confirm that no issues concerning modern slavery were discovered in our previous audits for the last financial year.

We only employ agency workers through reputable employment agencies that adhere to our anti-slavery and human trafficking policy (or equivalent policies).

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We continually monitor our effectiveness in terms of identifying and combating slavery and human trafficking.

All employees are responsible for complying with corporate policies associated with human rights and combatting human trafficking, including those policies identified above. These policies are available on the Nippon Gases website (<https://nippongases.com/>) and are communicated internally to all employees and externally to all business partners and other relevant parties. Management encourages employees to understand these policies and applicable laws related to them. Non-compliance, depending upon the circumstances, may result in serious disciplinary action up to and including termination of employment.

We have systems in place to encourage the reporting of concerns and take our obligation to protect whistle blowers very seriously. Employees who believe they have discovered or been subject to actions that are inconsistent with our policies are required to report this to their management, the appropriate staff group or the confidential Nippon Gases Integrity Hotline. Third party reports may be made through the confidential Nippon Gases Integrity Hotline. Nippon Gases Europe is committed to review and close 100 % of the calls that are made to the Nippon Gases Integrity Hotline. For the last financial year, we are pleased to report that no incidents concerning modern slavery were reported to any of our hotlines or throughout the business.

STAFF TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business and supply chains, we ensure appropriate training is provided to our staff.

All members of staff with customer facing roles are required to undertake a re-certification process which assesses their understanding of our Code of Conduct and includes questions on topics such as modern slavery. We are pleased to report that all staff who undertook the training have passed the accreditation process.

FURTHER STEPS

Following a review of the effectiveness of the steps we have taken over the past year and to ensure we are working to a program of continuous improvement, we intend to adopt the following key performance indicators (KPIs) during the coming financial year:

- An increase in the percentage of suppliers and sub-contractors vetted for ethical labour practices
- Continued review and prompt close out of reported breaches
- Maintain 100% completion of training, by relevant staff, on identifying and addressing the risk of slavery and human trafficking in our business and supply chains

These indicators will facilitate evaluation of how effective we have been at ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains.

Whilst no modern slavery concerns were identified within our supply chain during this financial year, we recognise the need to ensure that should such issues arise they are dealt with appropriately. During 2024 we intend to continue to review and strengthen the processes we have in place for dealing with potential supply chain issues.

This statement was approved by the Managing Director, Carl Woollins, on behalf of the board of directors.



Carl Woollins – Managing Director UK & Ireland

Dated this 11th October 2023