



Nippon Gases Europe Human Rights Policy

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Human Rights Policy

1. Introduction

This policy applies to all the employees of any company controlled by Nippon Gases Euro-Holding S.L.U.

This policy provides specific guiding principle concerning “Trust and Respect”, as provided in the Nippon Gases Code of Conduct, in particular with reference to respect of human rights.

Nippon Gases supports the spirit and meaning of the Universal Declaration of Human Rights, the United Nations Global Compact and the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work, and promotes the respect for human rights in the workplace and the creation of adequate working environments.

We seeks to do business with partners - customers, suppliers and contractors - who share the same commitment to human rights that we have.

All employees are responsible for complying with this policy, which is publicly available on the Nippon Gases website and communicated internally and externally to all employees, business partners and other relevant parties.

We shall endeavor efforts to provide human rights education in our organization so that every employee may gain a better understanding of human rights and the various issues related to human rights.

We consider fundamental the respect of human rights: non-compliance, depending upon the circumstances, may result in serious disciplinary action up to and including termination of employment.

2. Working conditions

We shall pay employees at least the minimum wages and overtime rates required by law and collective labor agreements and, if no such laws or agreements apply, wages in line with marketplace practices. We shall not discriminate in remuneration on any basis. We aim to provide an adequate standard of living for our employees and their families with our compensations and benefits.

We shall comply with applicable labor and employment laws and rules, including but not limited to those governing hours of work and relevant industry practice.

We shall ensure equal opportunities in recruitment, job assignment, promotion, employability and occupational development.

We provide a safe and healthy work environment for all employees and contractors in premises under our control. We shall work for the maintenance and promotion of the mental and physical health of our employees.

3. Prevention of Discrimination and Harassment

Equal treatment of all employees is a fundamental principle of our policy. We expect also our employees to be respectful, professional and fair in their dealings with colleagues and third parties.

We prohibit discrimination or harassment based on race, color, religion, sex, national origin, age, disability, pregnancy, sexual orientation, gender identity or expression, or any other reason prohibited by applicable law.

4. Diversity and Inclusion

We shall create an organization where a diverse workforce is able to work in a lively and vivacious manner and each employee is aware of his/her role, enhances necessary capabilities and respects diverse ways of working.

We encourage our employees to fully utilize their potential by offering ample development opportunities and supporting a feedback culture.

We shall also strive for a workplace where employees are able to fully utilize their capabilities and cooperate with each other to increase productivity, thereby allowing them to pursue and realize diverse ways of life at home as well as in their communities.

5. Health and Safety

We ensure high health protection, safety, environmental protection and quality standards at our sites. We believe that all injuries are preventable and we shall endeavor to prevent workplace hazards by prioritizing safety over anything else.

We shall be able to ensure a safe occupational environment by exercising safety management in accordance with applicable national and/or local laws, and through the voluntary and proactive efforts of each employee. Employees are obligated to stop or refuse to perform a job if it is not safe or cannot be performed safely.

All employees and onsite contractors are required to comply with our safety policies.

6. Freedom of Association and Collective Bargaining

We are committed to an open and constructive dialogue with our employees and their representatives.

Our employees are free to join organizations that represent them (including to determine whether to unionize or not) and these organizations may engage in collective bargaining according to applicable laws and regulations.

Employees who act as representatives are neither disadvantaged nor favored in any way.

7. Prohibition of Child or Forced Labor

We prohibit all forms of child, compulsory or forced labor at our operations and we shall require our business partners to adhere to the same policy.

“Forced” labor includes labor as defined by the ILO Convention 29 on Forced Labor and ILO Convention 105 on Abolition of Forced Labor and includes labor exacted by an employer through the use of coercion, including withholding food or wages, physical violence or sexual abuse, restricting peoples' movements or locking them up, and debt bondage. The term "child" is consistent with the ILO Convention 138 on Minimum Age and the ILO Convention 182: Worst Forms of Child Labor and refers to any person employed under the age of 15 (or younger where applicable law specifies).

8. Responsibilities

We expect all our employees to strictly adhere to the principles contained in this policy.

Employees who believe they have discovered or been subjected to actions that are inconsistent with this policy should report this to their management, the responsible Compliance Officer or the confidential Nippon Gases Compliance Hotline.

The responsibilities related to the application and implementation of this policy are as follows:

- the Chief Compliance Officer Europe has overall responsibility for the administration of this policy and the Nippon Gases' Code of Conduct, ensuring appropriate follow-through of reported violations;
- Human Resources and Managers at all levels are responsible for upholding the labor elements of this policy, supporting Nippon Gases's efforts to create a respectful and fair work environment, modelling their behavior accordingly and reporting noncompliance with those elements of this policy.



- Safety, Health and Environmental Managers at all levels are responsible for upholding the safety elements of this policy, supporting Nippon Gases's efforts to maintain a safe work environment, modelling their behavior accordingly and reporting noncompliance with those elements of this policy.
- Suppliers, vendors and contractors must agree to abide by this policy, or demonstrate a commitment to Human Rights via their own policies.

Third party reports may be made by sending an e-mail to: compliance@nippongases.com

We prohibit any form of retaliation against any individual for good faith reporting what they believe to be non-compliance with this policy.

Madrid, March 29, 2023

Nippon Gases Euro-Holding S.L.U.
Eduardo Gil Elejoste
President

DocuSigned by:
Eduardo Gil
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Questions or additional information:

Should you have questions regarding this policy, direct inquiries to:

Legal Director Europe

E-mail: laura.zanotti@nippongases.com

Revisions

Version	Date issued	Effective date	Content owner	Approved by
1.00	01.06.2019	01.06.2019	European legal Director	Nippon Gases Euro-Holding S.L.U. President
2.00	29.03.2023	30.03.2023	European Legal Director	Nippon Gases Euro-Holding S.L.U. President