

## **NIPPON GASES UK LIMITED**

### **MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT**

#### **INTRODUCTION**

Nippon Gases UK Limited (**NG UK**) is committed to the recognition and safeguarding of human rights in all the countries where we 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 keep improving its practices to combat slavery and human trafficking in its own operations and supply chains. In support of this commitment, policies and programs have been established to ensure that slavery or related human trafficking does not take place in our operations or our supply chain. 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.

**This is our third statement published pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes NG UK's statement for the financial year ending 31st March 2021. It sets out the changes to our organisational structure and the steps we have taken since the publication of our previous statement to identify the risks of modern slavery as well as continuing to safeguard the individuals who work for us against the risks of modern slavery.**

A link to our previous statement can be found here. <https://www.nippongases.com/>

#### **OUR BUSINESS**

The business activity of NG UK is based on the production and sales of carbon dioxide (CO<sub>2</sub>), 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.

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

## **ORGANISATIONAL STRUCTURE**

Nippon Gases Europe (**NGE**) is the parent company of NG UK. NGE, (formerly Praxair Gases), is a global company with more than 100 years of expertise in the industrial gases world. It is a leading industrial gas company in Asia, the US and Europe with headquarters in Japan. NGE produces, sells and distributes atmospheric, process and specialty gases for various applications in a wide variety of industries such as chemical industry, agricultural industry, food and beverage, electronics, energy, healthcare, manufacturing etc.

The production and distribution of industrial gases needs “air” as a principal raw material. The single largest cost item in the production is “energy”. For carbon dioxide, carbon monoxide, helium, hydrogen specialty gases and surface technologies, raw materials are largely purchased from outside sources. Where possible, NGE sources several of these gases, including carbon dioxide, hydrogen and calcium carbide, as chemical or industrial by-products.

NGE are owned by Nippon Sanso Holdings Corporation (**NSHC**). NSHC also own a number of gas businesses around the world, which as well as NGE, include Taiyo Nippon Sanso Group (Japan), Matheson Group (US) and Asia Oceania Group Companies (Asia).

## **SUPPLY CHAINS AND DUE DILIGENCE**

We recognise that the risks of modern slavery not only extend to our company but also our supply chain. Since our previous statement, the main change to our supply chain is the addition of a new CO2 terminal in Ireland which will seek to increase supply and product quality.

NG UK is committed to compliance with laws, and to upholding our strong standards of business integrity and related corporate policies, including those directed towards our suppliers and supply chain. These policies reflect our commitment 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.

We understand the need to ensure that our commitment is reflected throughout our supply chain. We therefore ensure that our procurement organisation discusses our expectations with suppliers upon qualification, contracting and during any audits conducted. All sourcing associates and managers receive regular training in our supplier expectations and our human rights policy.

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 4 years which 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 recognise the need to ensure that identifying modern slavery risks in our supply chain. Our executive management team continues to communicate with our top-tier suppliers annually to reinforce our commitment to these 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 continue to assess the effectiveness of our strategy and, where appropriate adopt policies and practices that improve our program.

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.

We recognise the need to identify and prioritise the risks associated with modern slavery throughout our supply chain. Whilst no modern slavery concerns were identified during this financial year we recognise the need to ensure that should such issues arise they are dealt with appropriately. One of our aims in 2022, is to formalise a procedure for dealing with such issues should they arise with our Suppliers.

## **OUR EFFECTIVENESS IN 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 is expected to encourage 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.

Employees who believe they have discovered or been subject to actions that are inconsistent with these 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. NGE 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.

We have in place systems to encourage the reporting of such concerns and the protection of whistle blowers.

## **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 assess 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 which requires a 100% pass rate.

## **FURTHER STEPS**

Following a review of the effectiveness of the steps we take to ensure that there is no slavery or human trafficking in any part of our business or supply chains we intend to take further steps to combat all forms of modern slavery. A number of these steps have been outlined above which in turn demonstrates full transparency.

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 12<sup>th</sup> August 2021