

## **NIPPON GASES**

### **Modern Slavery & Human Trafficking Statement**

Nippon Gases 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.

Nippon Gases 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 statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Nippon Gases (UK) Limited's statement for the financial year ending March 2020.**

#### ORGANISATIONAL STRUCTURE

Nippon Gases Europe ("NGE" or "We"), formerly Praxair Gases, is part of the global leader Tayo Nippon Sanso Corporation.

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, agriculture 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, Nippon Gases Europe sources several of these gases, including carbon dioxide, hydrogen and calcium carbide, as chemical or industrial by-products.

The business activity of Nippon Gases UK Limited is based on production and sales of carbon dioxide (CO<sub>2</sub>), as a compressed gas and as a solid material (dry ice). The products are used in various industries like food and beverage, chemical industry, agriculture industry, transport and blast cleaning.

Dominion Gas is an international oilfield services company supplying a full range of diving, welding, industrial, laboratory, test and calibration gases, chemical tanks and offshore equipment.

#### SUPPLY CHAINS AND DUE DILIGENCE

NGE 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. Our procurement organization discusses these expectations with suppliers upon qualification, contracting and during any audits conducted. All sourcing associates and managers receive regular training in our supplier expectations and human rights policy.

Our executive management team communicates 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. 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 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 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 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. Nippon Gases Europe is committed to review and close 100 % of the calls that are made to the Nippon Gases Integrity Hotline.

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.

## 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, Northern Europe on behalf of the board of directors on 30th March 2020

Signed



On behalf of the Board of Directors

Dated this 30<sup>th</sup> day of March 2020