



Company Overview

Governance

Commitment to Ethical Business

Global Data Privacy Policy

Modern Slavery Statement 2019/20

UK Tax Risk Strategy

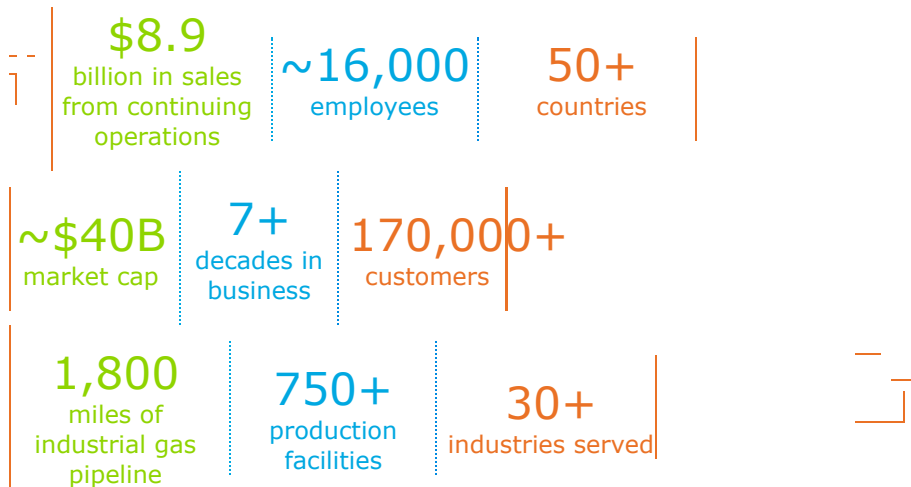
Air Products PLC Modern Slavery Statement 2019/20

This statement is published in accordance with Section 54 of The Modern Slavery Act 2015.

Air Products is opposed to slavery, human trafficking and the use of forced labour of any kind. The Company has established policies and processes in our businesses and supply chains in support of this position. This statement outlines the approaches Air Products is taking in 2019 to prevent modern slavery.

Air Products is a leader in the global industrial gas industry. Our goal is to ensure that Air Products will be the safest, most diverse and most profitable industrial gas company in the world, providing excellent service to our customers.

Our Business and Supply Chains



The Company is a basic m segments:

- Regional Industrial Gase and sell atmospheric gas (primarily recovered by process gases such as h syngas, and specialty ga
- Industrial Gases - Globa businesses, such as air s generators, as well as gl Industrial Gases busines
- Corporate and other seg businesses: liquefied na

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process technology, liquid helium and liquid hydrogen transport and storage containers, and turboexpanders and other precision rotating equipment.

Our UK Supply Chain

In the UK, Air Products sources from 34 countries and 87% of our supplier spend is with UK companies. Our key commodities include: energy, distribution services and equipment, equipment manufacturing, maintenance services and consumable materials.

The Company is committed to improving visibility into both our domestic and international supply chains. We will continue to undertake projects in 2019 to understand the manufacturing and labour conditions of the materials and services supplied to Air Products.

Policies and Contractual Controls

Air Products has implemented policies and contractual controls within our organisation and supply chain to ensure employee and supplier compliance and promote the identification of malpractice.

Any concerns about Air Products can be reported through our [IntegrityLine](#). Air Products encourages anyone to report, as allowed by local law, misconduct or ethics violations including modern slavery and forced labour.

No incidents of modern slavery were reported through the integrity line during FY18.

The Company is committed to maintaining and enforcing a [Human Rights policy](#) which provides, among other things, that Air Products supports, encourages and values a diverse, multi-cultural workforce and is strictly opposed to the use of child labour or forced labour of any kind, including but not limited to slavery, indentured servitude, human trafficking and all other forms of forced labour. The Company's Human Rights policy requires employees at all levels within the organisation to abide by the policy.

We share our [Employee Code of Conduct](#) with our suppliers to highlight our expectations of those who work with Air Products.

We are explicitly incorporating our terms and conditions to ensure all our suppliers and contractors adhere. Air Products routinely requires all our suppliers and contractors to contractually agree to the regulations in effect in the country they do business, including but not limited to regulations relating to slavery and modern slavery.

Air Products members of the Board have consulted with the Law Society to ensure such clauses are routinely included in our contracts. We also require our suppliers, contractors and subcontractors to commit to Human Rights.

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human trafficking by providing Air Products with a copy of their own Human Rights or Anti-Slavery/Human Trafficking policies. Air Products may further require its suppliers, vendors and contractors to complete certifications, satisfactory to Air Products, confirming that the materials incorporated into the products they supply to Air Products comply with all laws regarding slavery and human trafficking in the countries in which they do business.

Air Products' Corporate Audit department occasionally conducts audits and verifications of existing contractual agreements within the Supply Chain organization to ensure compliance with contractual terms, including but not limited to contractual terms relating to legal compliance. Air Products generally does not hire third parties to conduct audits or verifications for such purposes, although it reserves the right to do so in appropriate circumstances. Audits are generally conducted upon 30 days' notice.

Risk Assessment

Air Products has completed human rights assessments for its operations and supply chains. We reviewed the potential for human rights issues, including child and forced labor, in the highest risk countries in which we operate and did not identify any significant risks. From a supply chain perspective, we examined human rights risks relative to procurement spend and supplier location using country-specific risk information from third-parties. While there were no significant risks identified, we updated our third-party due diligence process to include questions about human rights. For the suppliers we use in the UK, we are continuing to conduct analysis and identify key suppliers in geographies and activities which we consider are high risk.

We have categorised our vendors to understand their supply chains and assess the risk. We have established an ongoing process to continually monitor those who have been identified with a high-risk profile relating to Modern Slavery.

Due Diligence

As stated in our Human Rights policy, we are opposed to slavery, trafficking and forced labour of any kind. Our Human Resources activities, including recruitment processes and remuneration practices, are compliant with UK law.

Air Products uses a consistent approach to assess the risks of third-party intermediaries involved in the work being done, whether through direct or indirect compensation amount and relationships with government officials. These risks represent medium or high risk. Our due diligence includes questions about vendor awareness, education and

We evaluate the labour standards of our contractors and their approach to their supply chain through our due diligence, which has expanded as part of the in

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as part of the procurement process and will be sent to all our current suppliers deemed to pose a risk.

We plan to modify our expectation of suppliers statement to declare that we expect our suppliers not to practice any form of forced labour or modern slavery and to comply to UK Modern Slavery Act 2015 and other relevant legislation.

Effectiveness

We are building a team from Procurement, HR and Supply Chain to uphold our procedures on modern slavery and sustainability.

Training

We are developing awareness training on Modern Slavery and Human Trafficking aimed at employees who roles are key in identifying and mitigating slavery and human trafficking risks.

Further to this, an awareness programme for supply chain employees is being formulated around screening and auditing our suppliers, vendors and contractors and communicating with them to identify any signs of modern slavery. This involves building material for a training programme for Supplier Training.

Contact Us

Questions regarding Air Products' commitment to eradicate slavery and human trafficking, both within its own organization as well as within the organizations with whom Air Products does business, may be addressed to our Quality Central Support Team, IG Europe at QGRPGOE@airproducts.com or [Julie O'Brien](#), Air Products' Sustainability Director.



Ivo Bols President, Europe

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