

Air Products

Modern Slavery Statement 2026

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

At Air Products, we are opposed to slavery, human trafficking and the use of forced labour of any kind, and we remain steadfast in our commitment to help eradicate modern slavery, both in the UK and around the world. We have established policies and processes in our businesses and supply chains in support of this position. This statement outlines the actions and activities we undertook in our Fiscal Year 2025 (which ended on the 30th of September 2025) to identify modern slavery within our operations and supply chain.

Our Global Business Overview

Air Products is a world-leading industrial gases company in operation for over 85 years focused on serving energy, environmental, and emerging markets and generating a cleaner future.

Air Products supply essential industrial gases, related equipment and applications expertise to customers in dozens of industries, including refining, chemicals, metals, electronics, manufacturing, medical and food. As the leading global supplier of hydrogen, Air Products also develops, engineers, builds, owns and operates some of the world's largest clean hydrogen projects, supporting the transition to low- and zero-carbon energy in the industrial and heavy-duty transportation sectors. Through its sale of equipment businesses, Air Products also provides turbomachinery, membrane systems and cryogenic containers globally



AIR PRODUCTS AT A GLANCE



Air Products has five business segments:

- Americas;
- Asia;
- Europe;
- Middle East and India; and
- Corporate and other.

The **regional industrial gases** segments produce and sell atmospheric gases such as oxygen, nitrogen, and argon; process gases such as hydrogen, helium, carbon dioxide, carbon monoxide, and syngas (a mixture of hydrogen and carbon monoxide); and specialty gases. The on-site business serves large-volume customers with relatively consistent demand by constructing or acquiring a plant on or near the customer's facility or delivering product from one of its pipelines. The merchant business delivers liquid or gaseous bulk supply either by tanker or tube trailer and, for smaller customers, delivers packaged gases in either cylinders or dewars.

The **Corporate and other** segment includes sales of cryogenic and gas processing equipment for air separation sold worldwide to customers in a variety of industries, including chemical and petrochemical manufacturing, oil and gas recovery and processing, and steel and primary metals processing. The Corporate and other segment also includes the results of the turbomachinery and distribution sale of equipment businesses. Additionally, Corporate and other reflects costs for corporate support functions and global management activities that benefit all segments, as well as other income and expenses not directly associated with the regional segments, such as foreign exchange gains and losses.

Our Organisation in the UK:

Air Products Group Limited is a wholly owned subsidiary of Air Products and Chemicals, Inc., a Delaware corporation, and is our UK group holding company.

Subsidiary companies of Air Products Group Limited include: Air Products PLC, Air Products (BR) Limited, Air Products Llanwern Limited, Air Products Equipment Limited, Gas Direct Limited, SIG Industrial Gases Ltd, Gas Direct Cymru Cyf, Air Products Renewable Energy Limited.

The Board of Directors of Air Products Group Limited has approved this statement on the 9th of February 2026.

Our UK Supply Chain

In the UK, Air Products sources from 36 countries and 20% of our supplier spend is with UK companies. Our key commodities include: energy, project execution and construction services, equipment manufacturing, distribution equipment and services, maintenance services and consumable materials.

Our Company is committed to improving visibility into both our domestic and international supply chains. We will continue to undertake projects in 2026 to understand the manufacturing and labour conditions of the materials and services supplied to Air Products

Policies and Contractual Controls

At Air Products, we have implemented and reviewed policies and contractual controls within our organisation and supply chain to ensure employee and supplier awareness and promote the identification of malpractice.

Any concerns about Air Products can be reported through our whistleblowing line, [IntegrityLine](#). We continue to encourage anyone, including our new starters, employees, workers, customers, suppliers and all other business partners, to report, as allowed by local law, misconduct or ethics violations including modern slavery and forced labour. A link to our IntegrityLine is provided on our Purchase Orders, our Supplier Code of Conduct and our website. Our IntegrityLine is available in over 20 languages. For concerned employees, we also offer a designated officer. Our Whistleblowing policy is designed to make it easy for all parties to make disclosures without fear of retaliation.

No incidents of modern slavery were reported through the IntegrityLine during Fiscal Year 2025.

Our 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. Our Company's Human Rights policy requires employees at all levels within the organisation to abide by the policy.

Air Products developed a [Supplier Code of Conduct](#) that includes our expectations of suppliers regarding business conduct, environmental protection, and social responsibility. The Supplier Code of Conduct applies to all suppliers – including their subsidiaries, affiliated entities and their suppliers and subcontractors – that do business with any company within the Air Products' group. It specifically addresses that suppliers should comply with all applicable human rights-related laws and regulations, and not use or tolerate the use of slavery, human trafficking or forced or child labour of any kind. During our vendor onboarding process, suppliers agree to abide by Air Products' Supplier Code of Conduct in their dealings with Air Products, and we share a link to the document which is available in multiple languages. The Supplier Code of Conduct is incorporated into our Global and General Terms and Conditions, and is being incorporated into our contracts as they are renewed.

Our Terms and Conditions of Purchase require our suppliers to abide by all laws, rules and regulations in effect in the countries and jurisdictions in which they do business, including but not limited to all laws, rules and regulations relating to modern slavery and human trafficking. We also incorporate in our Terms and Conditions a clause specific to Human Rights, requesting suppliers to abide by Air Products' Human Rights Policy and all applicable national laws and international treaties concerning human rights, labour rights, and human trafficking and slavery; suppliers are also requested to endeavour to prevent, mitigate, and account for the impacts of their activities in connection with the transactions they have with Air Products on the human rights of individuals directly or indirectly affected by their supply chains. Air Products members of the Procurement Department, in consultation with the Law Department, are trained to ensure that such clauses are included in contracts. We may also require our vendors and contractors to demonstrate a commitment to Human Rights and an opposition to slavery and human trafficking by providing Air Products with a copy of their own Human Rights or Anti-Slavery/Human Trafficking policies.

Air Products' 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. We generally do not hire third parties to conduct audits or verifications for such purposes, although we reserve the right to do so in appropriate circumstances. Audits are generally conducted upon 30 days advance notice.

Risk Assessment

It is our intention to conduct human rights assessments to strengthen our ability to identify, prevent, and address any potential risks within our own business through Fiscal Year 2026. This effort will ensure that our practices remain aligned with evolving regulatory and ethical expectations at a UK and European level. From a supply chain perspective, our European Procurement Operations organisation examines annually human rights risks relative to procurement spend and supplier location using country-specific risk information from a third-party solution; process has been improved to also take into account human rights risk relative to supplier industry.

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.

We use a consistent, global process to evaluate potential risks of third-party intermediaries. The risk assessment considers the work being done, where the work will be performed, compensation amount and method, and the potential for interaction with government officials. For third-party intermediaries that represent medium or high risk, due diligence is completed and includes a question about whether the vendor has a policy addressing human rights awareness, education, and training.

Globally, new suppliers are screened against Sanctioned Party Lists to identify any party which would have been sanctioned for illegal acts, including but not limited to using forced labour, prior to entering into an agreement. For entities on our ERP System, automated screening continues to occur based on designated milestones.

Our Global Capital Procurement organisation includes in their supplier assessment questionnaires at vendor qualification stage questions relative to human rights. Our European Procurement Operations organisation conducts supplier sustainability assessments with the use of a third-party assessor of company sustainability. This service provider uses a questionnaire and scoring to assess the sustainability efforts of suppliers across key sustainability topics, including but not limited to human rights, forced labour, child labour and human trafficking. In Fiscal Year 2025, we focused our assessment efforts on strategic/critical suppliers in our industrial gases business in Europe.

In addition, Air Products Europe is committed to operating in a socially responsible way and has opted to follow the [ISO26000](#) guidance. One of the key aspects of ISO 26000 is setting the guidelines for fair and responsible labour practices, which involves protecting the worker's right and freedom of association, ensuring fair treatment and non-discrimination, and eliminating forced and child labour from the workplace.

Effectiveness

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

Training

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

In Fiscal Year 2025, our European Procurement Organisation undertook a specific training on Modern Slavery in Supply Chains. This training is included as part of the onboarding of all future team members.

Contact Us

Questions regarding Air Products' commitment to eradicate slavery and human trafficking, both within its own organization as well as within the organisations with whom Air Products does business, may be addressed to UKINEHSQ@airproducts.com for Europe or Nathalie Lowles, Air Products' European Sustainability Manager.

Signed by **Ivo Bols**, President Europe and Africa



24-Feb-2026