



Anti-Slavery Policy

SECTION 1

PURPOSE

This policy applies to **Air Liquide Australia Limited** (ABN 57 004 385 782), **Air Liquide Healthcare Pty Ltd** (ABN 41 002 653 045) (Air Liquide Healthcare), **Healthy Workplace Solutions Pty Ltd** (ABN 35 121 729 584), **Air Liquide Australia Solutions Pty Ltd** (ACN 602 866 106), **Air Liquide New Zealand Limited** (NZBN 942903203612) and their related entities in Australia and New Zealand (collectively **Air Liquide**)

This policy also addresses the specific requirements of *Australia's Modern Slavery Act 2018* (Cth) (**Australian Act**).

SECTION 2

SCOPE

The Australian Act covers a range of prohibited activities in which coercion, threats or deception are used to exploit individuals and undermine their freedom. Collectively, these practices are referred to as “modern slavery”. More specifically, these activities include those described in section 3.

We recognise that modern slavery is a serious global problem that should be eradicated. We will not tolerate the presence of modern slavery practices in our operations or supply chains anywhere in the world.



SECTION 3

MODERN SLAVERY PRACTICES

Modern Slavery practices include the following:

Debt Bondage	A person's services are pledged as security for a debt and (a) the debt is manifestly excessive; (b) the person's services are not applied to satisfy the debt; or (c) the length and nature of the services are not limited and defined
Deceptive Recruiting	A person is recruited and in the process is deceived about their exploitation through a type of modern slavery
Forced Marriage	Coercion, threats or deception are used to make a person marry or where the person does not understand the nature and effect of the marriage ceremony
Forced or Compulsory Labour	Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily
Human Trafficking	Arranging or facilitating the travel of another person or harbouring that person with a view to their exploitation
Servitude	The obligation to provide services is imposed by the use of coercion, including where the victim is not free to leave their place of work
Slavery	Exercising powers of ownership over a person
The worse forms of child labour	A child is exploited through modern slavery practices or is engaged in hazardous work which may harm their health, safety or morals



SECTION 4 RESPONSIBILITY

Air Liquide and our managers, employees, contractors and suppliers have responsibilities to ensure workers in our operations and supply chains are safeguarded and treated lawfully, fairly and with dignity.

Everyone must observe this policy and be aware that turning a blind eye to modern slavery practices (or the risk of those practices) is unacceptable and simply not an option.

4.1. Air Liquide

We will:

1. Adopt and maintain clear policies and procedures preventing modern slavery and protecting the workers in our operations and supply chains;
2. Be clear about our recruitment policy (see Recruitment);
3. Lead by example by making appropriate checks on all employees, recruitment agencies, suppliers, etc to ensure we know who is working in our operations and supply chains;
4. Ensure we have in place an open and transparent grievance process for all workers in our operations and supply chains;
5. Seek to raise awareness so that all workers in our operations and supply chains know what we are doing to promote their welfare; and
6. Make clear statements to regulators, customers and suppliers that we take our responsibilities to all workers in our operations and supply chains seriously.

4.2. Managers

Managers will:

1. Listen and be approachable to workers in our operations and supply chains;
2. Respond appropriately if they are told something that might indicate a worker is in an exploitative situation;
3. Remain alert to indicators of modern slavery (see Identifying Modern Slavery);
4. Raise the awareness of our employees, contractors, sub-contractors and suppliers, by discussing modern slavery and providing training, so that everyone can spot the signs of modern slavery and know what to do about it; and
5. Use their experience and professional judgement to gauge situations.

4.3. Employees, Contractors And Suppliers

We all have responsibilities under this policy. Whatever your role or level of seniority, you must:

1. Keep your eyes and ears open—if you suspect someone in our operations or supply chains is being controlled or forced by someone else to work or provide services, follow our reporting procedure (see Reporting Modern Slavery);
2. Follow our reporting procedure if a worker tells you something you think might indicate they are or someone else is being exploited or ill-treated; and
3. Tell us if you think there is more we can do to prevent people from being exploited.





SECTION 5

SPECIFICATION

- HOW IS IT RELEVANT TO US?

- Modern slavery is a complex and multi-faceted crime and tackling it requires all of us to play a part. At first glance, you may think this whole subject is irrelevant to us, but it's not.
- At a very basic level, of course preventing exploitation and human trafficking, and protecting our workforce and reputation makes good business sense.
- The Australian Act recognises the important part businesses can and should play in tackling slavery and encourages them to do more.
- With this in mind, we need to pay particularly close attention to:
 1. Our operations;
 2. Any outsourced activities, particularly to jurisdictions that may not have adequate safeguards;
 3. Our supply chains (including our sub-contractors, direct (i.e. tier 1) suppliers, their suppliers and sub-contractors and so on down those supply chains to the source of raw ingredients and other products, no matter their place of origin).

SECTION 6 PROCEDURE

6.1. Anti-slavery Statements

- We will make clear annual statements to demonstrate that we take our responsibilities to our employees and people working within our operations and supply chains seriously.
- We will publish these statements on our website and as part of our company reporting.
- We will submit these statements to the appropriate regulatory authorities in compliance with our obligations under the Australian Act.

6.2. Recruitment

6.2.1. Using Agencies

Air Liquide will only use reputable recruitment agencies.

To ensure the risk of modern slavery is reduced as far as possible, we will thoroughly review recruitment agencies before adding them to our list of approved agencies. This may include:

1. Conducting background checks;
2. Investigating reputation; and
3. Ensuring agencies have appropriate processes implemented to ensure staff it provides have working rights and other appropriate checks are conducted.

We keep agencies on the approved list under regular review, at least every 3 years.

6.2.2. General Recruitment

- We will ensure that staff have a written contract of employment and that they have not had to pay any direct or indirect fees to obtain work.
- We have a system and processes to ensure that staff are legally able to work.
- We will provide information to all new recruits on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.

If, through our recruitment process, we suspect someone is being exploited, the Ethics Correspondent will be notified and we will follow our reporting procedures (See Reporting Modern Slavery).



6.3. Identifying Modern Slavery

There is no typical victim and some victims do not understand they have been exploited and are entitled to help and support.

However, the following key signs could indicate that someone may be a modern slavery victim.

The person:

1. Is not in possession of their own passport, identification or travel documents;
2. Is acting as though they are being instructed or coached by someone else;
3. Allows others to speak for them when spoken to directly;
4. Is dropped off and collected from work;
5. Is withdrawn or appears frightened;
6. Does not seem to be able to contact friends or family freely;
7. Has limited social interaction or contact with people outside their immediate environment.

This list is not exhaustive.

Remember, a person may display a number of the indicators set out above, but they may not necessarily be a victim of modern slavery. Often you will build up a picture of the person's circumstances which may indicate something is not quite right.

If you have a suspicion, report it.

6.4. Reporting Modern Slavery

- Talking to someone about your concerns may stop someone else from being exploited or abused.
- If you think that someone is in immediate danger, dial 000 (in Australia) or 111 (in New Zealand).
- Otherwise, you should discuss your concerns with the Human Resources Department of the respective Air Liquide entity in Australia or New Zealand or Air Liquide's Ethic Correspondent for Pacific. (Refer to Air Liquide's Whistle blowing Policy.)
- Not all victims may want to be helped and there may be instances where reporting a suspected modern slavery case puts the potential victim at risk, so it is important that in the absence of an immediate danger, you discuss your concerns first with Air Liquide's Ethics Correspondent before taking any further action.

SECTION 7 RECORDS RETENTION

We will review this Anti-slavery policy regularly, at least annually.



A world leader in gases, technologies and services for Industry and Health, Air Liquide is present in 80 countries with approximately 67,000 employees and serves more than 3.7 million customers and patients. Oxygen, nitrogen and hydrogen are essential small molecules for life, matter and energy. They embody Air Liquide's scientific territory and have been at the core of the company's activities since its creation in 1902.

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