



Air Liquide Australia Modern Slavery Statement 2024



Message from the Managing Director



As a world leader in gases, technologies, and services for industry and health, present in 60 countries, the Air Liquide Group places sustainable development at the heart of its strategy. This commitment, including to social well-being for employees and communities, human rights, and ethics, is fully integrated into our strategic planning and business model, as further detailed in the Group's 2024 Vigilance Plan.

Consistent with Air Liquide Group's global commitment, Air Liquide Australia Limited and its subsidiaries is strongly committed to upholding employees' and other human rights and ethical conduct, and fully supports the Australian Government initiatives which aim to eliminate all forms of modern slavery.

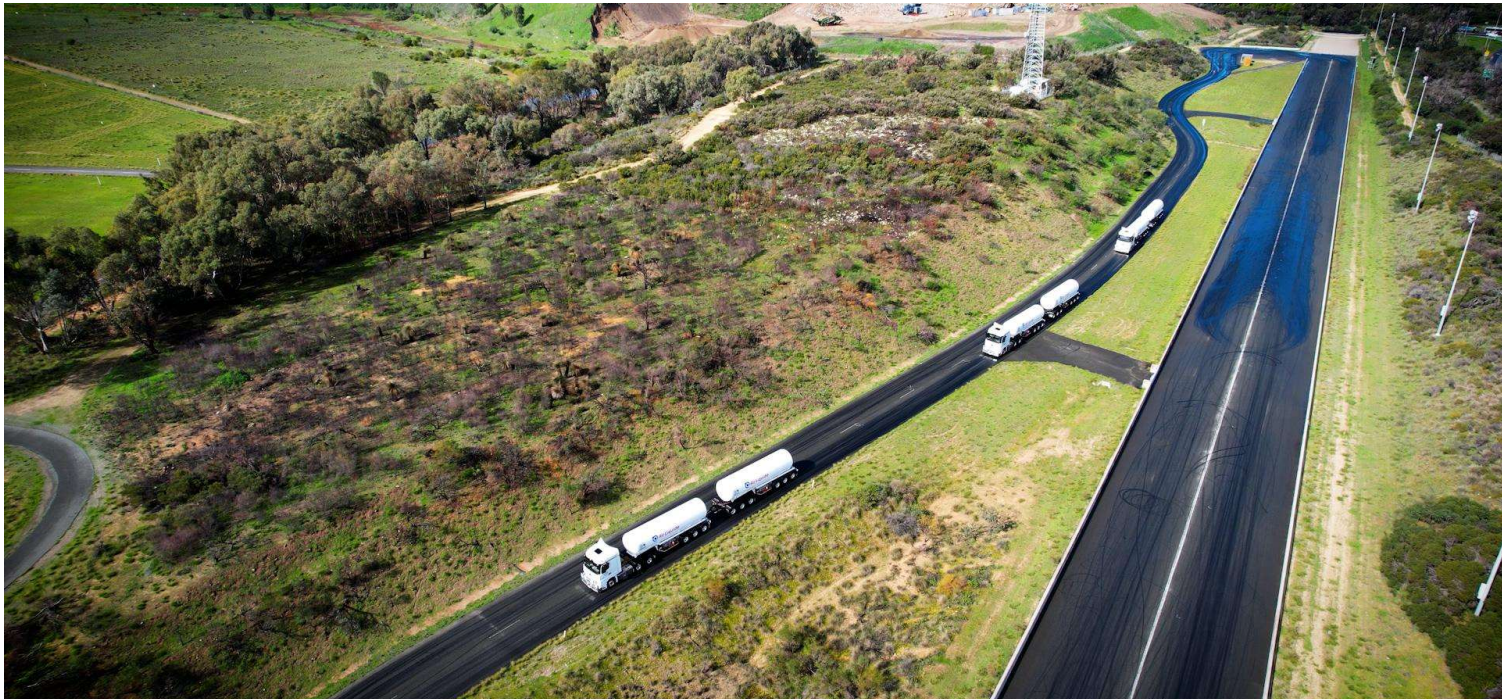
We expect our employees within Air Liquide Pacific and all our business partners, suppliers, contractors and sub-contractors to align with this approach.

This statement was approved by the board of directors of Air Liquide Australia Limited in June 2025.

A handwritten signature in black ink that reads "Tim Kehoe".

Tim Kehoe
Managing Director
Air Liquide Australia Limited

Introduction



The reporting entity

This statement is made pursuant to the Australian Modern Slavery Act 2018 (Cth) (**the Act**) and is submitted as a statement by Air Liquide Australia Limited (ABN 57 004 385 782) (ALA). ALA is the reporting entity. ALA is an unlisted public company limited by shares incorporated in Australia and has the following subsidiaries:

- Air Liquide Healthcare Pty Ltd (ABN 41 002 653 045) (**ALH**),
- Air Liquide New Zealand Limited (NZBN 942903203612) (**ALNZ**)

A reference to **Air Liquide Pacific** in this document is to ALA, ALH, and ALNZ. A reference to **Air Liquide Australia** is to ALA and ALH, which operate in Australia. A reference to **Air Liquide Healthcare** is to our home healthcare business conducted under ALH in Australia and ALNZ in New Zealand.

Structure, operations and supply chains



Our Structure

The Air Liquide Group is a world leader in gases, technologies and services for industry and health. It is present in 60 countries* with approximately 66,500 employees and serves more than 4 million customers and patients.

The parent company of the Air Liquide Pacific entities is L'AIR LIQUIDE Société Anonyme pour l'Etude et l'Exploitation des Procédés Georges Claude (L'AIR LIQUIDE S.A.) which is headquartered in Paris, France. L'AIR LIQUIDE S.A. is listed on the Euronext Paris stock exchange (Euronext Paris stock exchange (compartment A) and belongs to the CAC 40, CAC 40 ESG, EURO STOXX 50, FTSE4Good and DJSI Europe indexes. Each year, L'AIR LIQUIDE S.A. establishes and implements its Vigilance Plan under the "Law on the Duty of Vigilance" introduced in article L. 225-102-4 of the French Commercial Code, which Plan must include "reasonable vigilance measures to identify the risks and prevent severe impacts on human rights and fundamental freedoms, health and safety of persons and on the environment". The Vigilance Plan applies to L'AIR LIQUIDE S.A. and all its subsidiaries.

ALH and ALNZ are wholly-owned subsidiaries of ALA, operating in Australia and New Zealand respectively.

The registered office of ALA, and headquarters for Air Liquide Australia's industrial and medical gases business, is in Melbourne. The registered office of Air Liquide Australia's home healthcare business, namely ALH, is in Ormeau, Queensland. The registered office and headquarters of ALNZ, which spans industrial and medical gases, is in Auckland.

Air Liquide Pacific has approximately 670 employees across Australia and New Zealand, and operates at over 80 sites around Australia and New Zealand. This includes 4 dedicated offices, 8 Air Separation Units/CO₂ production plants, 9 filling stations, approx 20 storage/depots and 45 home healthcare clinics.

* Excluding Russia, where the entities are no longer consolidated following the loss of control on September 1st, 2022.

Structure, operations and supply chains

Our Operations

Air Liquide Pacific is active in three main business lines which are:

- Large Industries (ALA)
- Industrial Merchant and Medical Gases (ALA and ALNZ); and
- Home Healthcare (ALH).

Large Industries

The Large Industries business offers gas and energy solutions involving supply of oxygen, nitrogen, argon, hydrogen and carbon dioxide. These gases are essential for industrial production, and to improve the process efficiency and environmental performance of our customer's plant operations.

The Large Industries business line operates major production units and serves customers in the metals, chemicals, refining and energy sectors, where high gas volumes call for a dedicated plant supply by pipeline.

Large Industries also supplies the Industrial Merchant business line with gases.



Industrial Merchant including Medgas

The Industrial Merchant activity covers the supply of a wide range of different gases, application equipment and associated services to customers who require smaller quantities than Large Industries' customers. The majority of gases supplied by Industrial Merchant are gases produced by Air Liquide in Pacific and internationally.

Gases and equipment supplied include:

Bulk liquid gases - delivered via third party transport providers from Air Liquide Pacific production plants or other storage locations into onsite vessels and equipment installed at customers' sites;

Onsite production equipment - small production units which can be installed locally for customers with larger gas needs, or in remote areas;

"Packaged" (cylinder) gas - filled at Air Liquide Pacific packaged gas production facilities and then distributed by third party transport providers, either directly to end customers or indirectly via Air Liquide's agency network.



Structure, operations and supply chains

Industrial Merchant serves five primary markets:

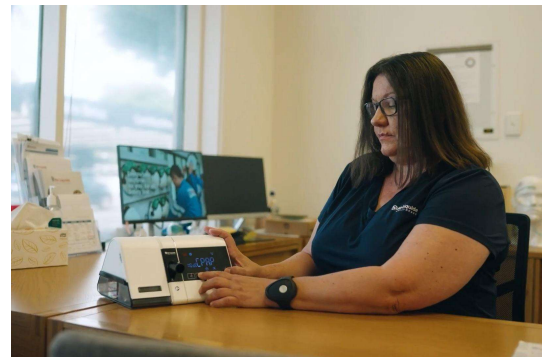
- metal fabrication industries: all industries using industrial gases for metal fabrication: automotive, heavy machinery, workshops (cutting, welding, etc.);
- food industry: all industries using industrial gases for food processing and beverages (poultry, meat, supermarkets, soft drinks, bars, etc.);
- mining and chemical industry: using gases in their processes (inerting, gold, petrochemical, water treatment, etc.);
- hospitals, labs and healthcare: using gases vital for life support and specialized equipment. This includes bulk oxygen, cryobiology applications and support for research institutions and universities.



Home Healthcare

ALH is a leading provider of healthcare in the home to patients throughout Australia through the supply of respiratory and related products and services. ALH supplies these goods and services direct to patients as well as to small and medium healthcare business such as aged care facilities, clinics and laboratories. Products and services are delivered by ALH itself and also through authorised agents. ALH provides:

- patients with oxygen cylinders and oxygen concentrating devices, sleep apnea treatment products and therapy; and
- healthcare facilities and clinics with cylinder oxygen, respiratory equipment and incidental products and services.



Structure, operations and supply chains



Our Supply Chain

The majority of Air Liquide Pacific revenue comes from products (being gases) produced by Air Liquide Group in Australia and New Zealand, using raw materials, energy and utilities sourced from Australia or New Zealand as applicable. To facilitate the delivery of our gases and equipment to our end customers within Pacific, (and except in the case of pipeline supply) we utilize third party transport providers and leverage off a network of agents.

During 2024, approximately 95% of the aggregate value of purchases from suppliers by Air Liquide Pacific (excluding ALH) was from Australia and New Zealand.

Beyond what we source and use in our own production, we also import industrial equipment, medical devices, and other gases from over 100 direct suppliers across more than 20 countries. The top 5 countries *outside of Australia and New Zealand* from which Air Liquide Pacific sourced products and services in 2024 were Italy, China including Hong Kong, United States, Austria and Singapore.

Overall, key categories of expenditure are energy, technical services, gas & industrial products, medical and transportation services.

Risks of modern slavery practices in our operations and supply chains

In examining our operations and supply chain, based on a country- and industry-specific assessment of our suppliers, and having regard to the industries and countries (Australia and New Zealand) in which we operate, Air Liquide Pacific considers there is a low inherent risk of Air Liquide Pacific's operations causing, contributing or being directly linked to forced labour, child labour and other forms of modern slavery.

In our operations

As at the date of this statement, there have been no occurrences of modern slavery in our operations reported through our grievance mechanism (described below).

Sourcing a large majority of our workforce directly and maintaining a strong policy environment in relation to workplace relations gives us confidence that modern slavery risks are low. In addition, to ensure the risk of modern slavery is reduced as far as possible, we source the remainder of our workforce from a limited number of recruitment agencies who have passed our approval process. Our approval process includes conducting background and reputational checks, and ensuring the agency has appropriate processes implemented to check that the staff they provide to us have working rights and other appropriate checks are conducted.

In our supply chain

Air Liquide Pacific remains aware of the potential risk of contributing to or being linked to modern slavery through its sourcing of goods and services from a diverse range of suppliers, including direct suppliers as well as the external transport providers and network of agents that support the supply by Air Liquide Pacific of products to end customers.

The extent of supply chain risk is dependent on a number of factors including the level of human rights protection and/or enforcement in the countries from where our suppliers (including service providers and agents) operate or source, and any inherent risks associated with the various product categories.

As noted above, since the majority of our products and services sourced are produced or performed in Australia or New Zealand, we have identified the risk of contributing or being directly linked to modern slavery risks as low (based on the insights gained from the Global Slavery Index).

However, to ensure modern slavery is not going undetected in Air Liquide Pacific's supply chain, due diligence processes have been implemented and further processes are being implemented as described in the section of this Statement outlining actions taken to assess and address modern slavery risks.

Actions taken to assess and address these risks, including due diligence and remediation processes

Policies

We aim to uphold high ethical standards and ensure that there is no modern slavery in our supply chains or in any part of our business. In order to mitigate risks or prevent severe impacts relating to modern slavery and other sustainable procurement risks, we have a suite of policies and procedures guiding the actions of our people, including how we work with each other, our recruitment and purchasing practices and our engagement with customers, to identify, prevent and mitigate the risk of modern slavery violations in our supply chains and operations. An overview of these policies and procedures is set out below.

Air Liquide Group

Air Liquide Group policies that address modern slavery or human rights in a broader sense include the following documents which can be located at

<https://www.airliquide.com/sustainable-development/ethics>:

- Air Liquide Group Principles of Action
- Group Code of Conduct
- Group Supplier Code of Conduct

These documents affirm Air Liquide's values and commitment to human rights, such as health, safety, non-discrimination, freedom of opinion, expression and association, decent and fair working conditions, and the prohibition of child labor and modern slavery.

The [Group Code of Conduct](#) applies to all Group officers and employees, and Air Liquide expects its business partners to comply with the principles of this Code.

The BlueBook, a global reference manual, accessible to all employees on the Group Intranet, translates the Principles of Action and the Code of Conduct into policies, codes and operational procedures.

The Group has its whistleblowing policy on the Group Website and has made a whistleblowing system (Ethical) available, as further detailed below under the section heading "Grievance Mechanism".

In relation to supplier relationship management, the Group has established:

- Group Sustainable Procurement policy
- Group Supplier Risk and Relationship Management
- Group Third Party Screening Guidelines

Actions taken to assess and address these risks, including due diligence and remediation processes

Air Liquide Pacific

The above Codes and policies are implemented and complemented locally by:

- our Air Liquide Pacific Anti-Slavery Policy (reviewed annually) contains a clear commitment to the eradication of modern slavery and sets out the minimum standards expected of all entities in scope. Our Anti-slavery Policy encourages the reporting of any instances of suspected modern slavery incidents in accordance with our local Whistleblower Policy. These policies can be found on our website at <https://au.airliquide.com/our-policies> (also <https://au.healthcare.airliquide.com/csr> and <https://nz.airliquide.com/legal/our-key-policies>).
- Commercial Partner Screening Process (ALH)
- HR Recruitment and Selection and Independent Contractors Policies

The day-to-day responsibility for overseeing implementation of Group and local policies, and supplementing these policies, as required from time to time, is assigned to relevant departments within Air Liquide Pacific including HR, Procurement and Legal. We consider that, on the whole, the implementation of our company values and policies establishes an ethical culture and environment which does not tolerate or knowingly allow modern slavery to enter Air Liquide Pacific's operations or supply chain.



Contracting processes

Our Group Supplier Risk and Relationship Management requires us to undertake pre-engagement preliminary due diligence of new suppliers (see further detail under the section heading *Due Diligence* below). It also requires that the Group Supplier Code of Conduct be communicated to any new supplier as a prerequisite for supplying Air Liquide, unless Air Liquide agrees that the supplier's own Code of Conduct is aligned with such principles.

Consistently with the above, Air Liquide Pacific typically requires new suppliers (except agents) to accept Air Liquide Pacific's Terms & Conditions for purchase of goods and/or services, which include a modern slavery clause, refer to our Anti-Slavery Policy and require suppliers to confirm their adherence to the Air Liquide Supplier Code of Conduct. Our commitment to human rights is also evidenced in our Air Liquide Pacific's Packaged Gases Supply Terms, which also addresses modern slavery. These documents are located at: <https://au.airliquide.com/legal>, also can be found on the Home Healthcare website <https://au.healthcare.airliquide.com/legal> and Air Liquide New Zealand website <https://nz.airliquide.com/legal>.

In the case of agents, standard contracts require agents to comply with the principles set out in the Air Liquide Code of Conduct.

Our commitment to ethics, compliance and prohibiting modern slavery is also reflected in our own standard customer contracts.

Actions taken to assess and address these risks, including due diligence and remediation processes

Due Diligence

Air Liquide's Group Supplier Risk and Relationship Management Policy entrenches a staged risk-based due diligence process to enable Air Liquide to make informed procurement decisions. This includes due diligence directed at identifying human rights infringements including practices amounting to modern slavery.

In respect of all new suppliers, our Group Supplier Risk and Relationship Management Policy requires a trade compliance check to be conducted to confirm that the supplier has not been convicted of corruption, fraud, violation of human rights and trade sanctions. This check is conducted through Dow Jones databases that include international sanction lists and databases capturing existing adverse media articles relating to a supplier. For ALA and ALNZ, this is carried out, if not earlier, in the process of setting up a new supplier in the e-procurement system. ALH applies a Commercial Partner Screening Process to new suppliers within its Healthcare business which couples background due diligence with the above trade compliance checks.

The pre-engagement process in relation to a new Air Liquide supplier, as well as the ongoing monitoring of existing suppliers, requires that the expected annual expenditure of a supplier with Air Liquide be estimated and a risk assessment be conducted taking into account the expected expenditure and risk assessment, leading to categorisation of the supplier criticality. A supplier categorised as a critical supplier is the subject of more detailed risk assessment as part of the supplier qualification process.

Risks taken into account in this classification include the risk associated with the supplier's performance in respect of human, social and labour rights, and includes practices amounting to modern slavery. These factors are captured under the risk entitled "sustainability risk".

"Sustainability-Critical Suppliers" are those determined under the Air Liquide Group Sustainable Procurement policy as most exposed to sustainability risks. The methodology for identification of "Sustainability-Critical Suppliers" uses three key criteria:

- annual spend with the supplier;
- the nature of the supplier's activity (taking into account risk mapping for respective categories of activity); and
- the country in which the supplier operates (taking into account risk mapping for different countries, based on a weighting of recognized public indicators including the Global Slavery Index and the ITUC Global Rights Index).

Actions taken to assess and address these risks, including due diligence and remediation processes

Where a supplier is identified as a Sustainability-Critical Supplier, a further assessment is conducted, mainly based on two types of questionnaires:

- from an external platform (EcoVadis) specialized in the assessment of CSR (Corporate Social Responsibility) performance which deploys an online questionnaire based on the ISO 26000 standard to assess the CSR commitment of suppliers.
- from Air Liquide, which has created an internal questionnaire, as an alternative to the solution offered by the external platform. This is sent to Sustainability Critical Suppliers selected for the assessment campaign who refuse to reply to the questionnaire sent by the external platform.

Assessment results identify whether a supplier is a responsible supplier, a supplier needing improvement or a non-compliant supplier, and corrective action can then be taken by Air Liquide, which (in a more serious case) can lead to termination of the supplier relationship. Further details of this process can be obtained from the [2024 Air Liquide Group Vigilance Plan](#) (which can be located on the Air Liquide Group website.

In 2024, based on the Air Liquide Group Sustainable Procurement policy described above, Air Liquide Pacific had 1 "Sustainability-Critical Supplier" which was assessed under the above more detailed process. Air Liquide Pacific also had 15 critical suppliers in respect of its Australian operations and 2 critical suppliers in respect of its New Zealand operations which underwent further risk assessment as part of the supplier qualification process.

Risk management

Our approach to managing supplier risks and relationships operates on multiple levels. At a high-level, our Group Supplier Risk and Relationship Management procedure mandates periodic mapping of key risks, including "sustainability risk." This sustainability risk assessment considers a supplier's environmental, social, and ethics activities, encompassing modern slavery risks.

At a more contractual and operational level, our standard purchasing terms and conditions for Air Liquide Pacific include the right to verify supplier compliance with relevant policies and ensure their understanding of Modern Slavery obligations and our expectations, and allow for the issuance of a Rectification Plan to a Supplier if Air Liquide Pacific identifies any shortcomings or areas for improvement.

Actions taken to assess and address these risks, including due diligence and remediation processes

Grievance mechanism

The Group's whistleblowing policy, available on its website, includes EthiCall, a system accessible to all internal and external stakeholders (customers, patients, suppliers, subcontractors and their staff, and local communities). EthiCall allows alerts to be made by telephone or via dedicated websites on the Group's website and Intranet, with initial collection by service providers. Air Liquide regularly communicates about these systems to its employees through various channels, including posters, Intranet, annual mandatory e-learning, managerial communication, and induction training for new hires. For employees, EthiCall complements existing reporting channels like line management, Human Resources, Ethics Correspondents, and the Group Ethics Officer. Suppliers are informed about how to lodge an alert via the ethics whistleblowing system section in the Group Supplier Code of Conduct.

The Air Liquide Pacific Whistleblower policy (located at our website at <https://au.airliquide.com/our-policies>, also <https://au.healthcare.airliquide.com/csr> and <https://nz.airliquide.com/legal/our-key-policies>) locally implements the Group policy. It provides details on how employees, suppliers, and other eligible whistleblowers can report modern slavery incidents. Accordingly, individuals dealing with Air Liquide Pacific have multiple confidential and retaliation-free options to raise alerts, including contacting nominated persons in the local Whistleblower policy or using EthiCall, which offers anonymous reporting through an external service provider. Employees are encouraged to disclose reportable conduct in face-to-face compliance training, intranet and internet links, and Ethicall posters at sites.

Remediation

Air Liquide Pacific has built in various contractual protections in its supplier contracts. In the event of a modern slavery violation by its supplier, these could be relied upon to provide leverage to influence the supplier to provide remediation to any victim of the relevant modern slavery violation.

Training

As part of broader Air Liquide Group Procurement teams supporting Air Liquide entities in Australia and New Zealand, our local procurement personnel are trained in respect of the due diligence processes approach entrenched in Group Supplier Risk and Relationship Management and Group Sustainable Procurement policy.

More generally, Air Liquide Pacific personnel undertake an e-learning module dedicated to the Group's Code of Conduct. This module is mandatory for all Group employees each year. During the e-learning, each employee renews their adherence to the Code of Conduct and their commitment to comply with its provisions after testing their knowledge to validate their participation in the e-learning. Across the Air Liquide Pacific entities in 2024, more than 95% of employees completed this training.

Actions taken to assess and address these risks, including due diligence and remediation processes

Supplementing the e-learning training programme, Air Liquide Pacific runs each year a classroom-style training programme which covers ethics, anti-bribery and corruption. This classroom style training is directed to a target group of approximately 220 Air Liquide Pacific employees across Australia and New Zealand. Employees in the target group must participate in this classroom-style training once at a minimum each three years. In 2024 alone, approximately 160 employees of the target group of employees attended a session. The training includes information on what constitutes modern slavery, offers relevant real-world examples, identifies red flags to watch for, and details how to report any suspicions or concerns.

Training data is collated and reported outside of Air Liquide Pacific to Air Liquide Group

Air Liquide Pacific continues to take steps to align (to the extent practicable) modern slavery related risk management practices across Air Liquide Pacific entities by encouraging dialogue between key internal stakeholders and by implementing cross-entity responsibilities of the local procurement team.

How the reporting entity assesses the effectiveness of these actions

We acknowledge that assessing the effectiveness of the systems and processes we have in place is critical to ensuring we can identify and reduce modern slavery risks in our supply chain and operations. As such, Air Liquide Pacific continues to seek to identify and avoid potential modern slavery risks across our operations and supply chain by expanding and strengthening its approach to supplier due diligence.

During the reporting period Air Liquide Pacific continued to evaluate the effectiveness of our modern slavery risk management framework, applying Group and local policies to identify limitations and gaps in the current due diligence process, with continuing efforts to strengthen and embed these processes.



Process of consultation

In performing the actions described throughout this Statement, the reporting entity Air Liquide Australia Limited has consulted senior management of each of the subsidiaries covered by this statement and sought input from key stakeholders across various functions supporting Air Liquide in Australia and New Zealand.



Air Liquide is a world leader in gases, technologies and services for industry and healthcare. Present in 60 countries with 66,500 employees, the Group serves more than 4 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 Group's activities since its creation in 1902.

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