# PRAXAIR'S POSITION ON COMBATING HUMAN TRAFFICKING AND SLAVERY

Praxair Surface Technologies, Inc. and Linde PLC are committed to the recognition and safeguarding of human rights in all the countries in which we operate. In support of this commitment, we have established and maintain policies and programs 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, and labor rights, 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 Position Statement for Praxair's 2020 fiscal year is made in accordance with the requirements of Section 54(4) of the UK Modern Slavery Act of 2015. Further details of Praxair's policies, systems and controls to combat Human Trafficking and Slavery are provided below.

## **Our Business and Organization**

NOxBOX Limited and Praxair Surface Technologies Limited are wholly-owned subsidiaries of Praxair, Inc., which is a wholly-owned subsidiary of Linde plc, the largest industrial gas company worldwide. For the year ended 2020, Linde plc had global sales of \$27,200 million\*. Praxair produces, sells and distributes atmospheric, process and specialty gases, and high-performance surface coatings. Our products, services and technologies are making our world more productive by bringing efficiency and environmental benefits to a wide variety of industries, including aerospace, chemicals, food and beverage, electronics, energy, healthcare, manufacturing, primary metals and many others.

Praxair's principal raw material is air, a renewable natural resource. Energy – electricity, natural gas, gasoline and diesel – is the single largest cost item in the production and distribution of industrial gases. For carbon dioxide, carbon monoxide, helium, hydrogen, specialty gases and surface technologies, raw materials are largely purchased from outside sources. Where feasible, Praxair sources several of these gases, including carbon dioxide, hydrogen and calcium carbide, as chemical or industrial byproducts.

NOxBOX Limited operates from the UK and provides a range of non-invasive Nitric Oxide (NO) and Nitrogen Dioxide (NO2) measurement and delivery system monitors that provide accurate, real-time monitoring to ensure the correct dosages and to reduce side-effects of inhaled nitric oxide (INO) therapy for in-hospital use as currently authorized by local regulation. The NOxBOX range includes the NOxBOXO2 to measure O2 levels and the NOxBOX Mobile, a self-contained unit for mobile use and most recently the NOxBOXi a delivery system, which is currently sold in many countries, provides intelligent nitric oxide delivery with precise real-time monitoring of nitric oxide, nitrogen dioxide and oxygen through a touch screen with step-by-step guided interface to enable ease of use.

Praxair Surface Technologies Limited operates from the UK and its business activities are based on the application of surface treatment and coating services to engineered products supplied by others. The services are applied to engineered products used in various industries like Aerospace, Energy, Automotive, Chemical Industry, Agriculture Industry, and Construction Equipment.

## **Our Values and Policies**

Praxair has established and enforces policies that reflect our values and commitment to human rights in all the countries in which we operate. Underlying these policies is Praxair's <u>Code of Business Integrity</u>, which establish requirements for all employees and suppliers. Praxair's <u>Human Rights Policy</u> provides the basic framework to support our values and commitment. This policy sets forth Praxair's opposition to the use of all forms of child, compulsory or forced labor at our operations and establishes the expectation that our business partners, suppliers and contractors will demonstrate similar intolerance for such practices.

Praxair addresses these issues directly in its <u>Combating Trafficking in Persons Policy</u>, which specifically prohibits Praxair employees, wholly owned subsidiaries or contractors in the performance of any work in any covered U.S. government contract, from engaging in trafficking in persons, procuring commercial sex acts, or using forced labor. In addition, Praxair has a <u>Conflict-Free Materials Supply Policy</u>, applicable to relevant suppliers and their supply chain, which sets forth our commitment to responsible sourcing of raw materials.

Together, these policies set a standard of performance that must be met by all Praxair employees, suppliers and contractors.

# **Our Supply Chain and Due Diligence**

Praxair 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 labor and child labor in our supply chain. Our global procurement organization regularly discusses these expectations with suppliers upon qualification, contracting and during any audits conducted. All sourcing associates and managers receive training at least annually in Praxair's supplier expectations and human rights policy.

In furtherance of our goal of utilizing "conflict-free" materials, Praxair has developed global procedures that communicate our expectation that suppliers of conflict minerals (1) implement due diligence processes to determine the origin of raw materials within their supply chain, and (2) will not supply to Praxair any conflict minerals known to come from the conflict region that are not either (a) from a compliant smelter or refiner, or (b) from recycled or scrap sources.

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 the Company's global 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 national and regional statutory requirements in the countries in which they operate, including any applicable national laws regarding human trafficking, forced labour and other forms of modern slavery. We are currently developing standard language for terms and conditions, which will be included where applicable in future contracts.

Praxair's annual Sustainable Development Reports, available at <a href="http://www.praxair.com/our-company/sustainable-development/reporting-center">http://www.praxair.com/our-company/sustainable-development/reporting-center</a>, further outline annual progress in this area. Training in Praxair's Human Rights policy has been conducted for global managers and above and is available to all staff. Training in the issue of Modern Day Slavery and Sex Trafficking has been made available to segments of Praxair staff and contractors.

## **Our Effectiveness**

All employees are responsible for complying with corporate policies associated with human rights and combatting human trafficking, including the policies identified above. These policies are available on the Praxair website and communicated internally to all employees and externally to our 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 subjected to actions that are inconsistent with this policy are instructed to report this to their management, the appropriate staff group or the confidential Praxair Integrity Hotline. Third party reports may be made through the confidential Praxair Integrity Hotline. Our current Sustainability Development targets (SD2020 Targets) include a commitment to review and close 100% of the calls that are made to the Praxair Integrity Hotline.

Suppliers of conflict minerals must submit written evidence of due diligence documentation to Praxair which may include completing the standardized Responsible Minerals Initiative (RMI) Conflict Minerals Reporting template or other certifications. If Praxair identifies a reasonable risk that a supplier, or any of its affiliates or sub-suppliers, is (i) sourcing conflict minerals from the conflict region and such conflict minerals are not from a compliant smelter or refiner or from recycled or scrap sources, and/or (ii) engaged in conduct inconsistent with Praxair's Code of Business Integrity or Human Rights Policy, we will reassess our business relationship with such supplier.

Approved and signed on behalf of the Board of NOxBOX Limited and Praxair Surface Technologies Limited on 30th June 2021