

AIR LIQUIDE PORTUGAL CORRUPTION PREVENTION PLAN

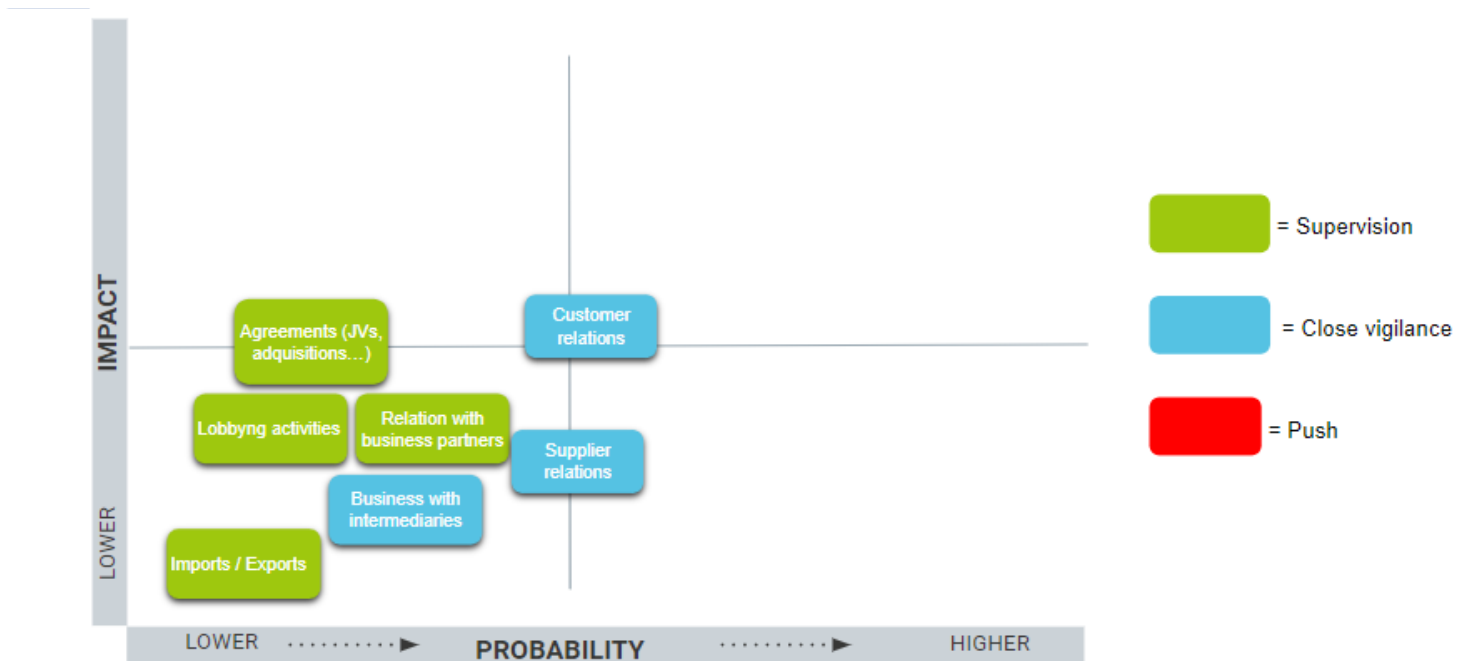
Informação para os trabalhadores da Air Liquide:

Como um dos pilares da Ética nos negócios, a Air Liquide elaborou um Plano de Prevenção de Riscos de Corrupção e Infrações Conexas ("PPR"), o qual será revisto a cada 3 anos ou sempre que alguma alteração nas atribuições ou na estrutura orgânica ou societária justifique.

O PPR identifica, analisa e classifica as situações que podem ocasionar atos de corrupção, no setor e na área geográfica em que operamos.

O PPR lista as medidas preventivas e corretivas aplicáveis aos riscos.

AIR LIQUIDE PORTUGAL - CORRUPTION RISK MAP



(To be revised every 3 year and/or when a significant change of the attributions and structure of the Company occurs)

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Número único de matrícula e de identificação fiscal: 500 261 512 Matriculada na Conservatória do Registo Comercial de Cascais

Capital Social: 13.250.000 Euros - Alvará n.º 5888 IMPIC - Telf. 800784333 (gratuito)

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AIR LIQUIDE PORTUGAL - PREVENTIVE AND CORRECTIVE MEASURES

Preventive and Corrective Measures applicable to all risks:

- Air Liquide Code of Conduct
([https://pt.airliquide.com/statics/2022-07/2022_PortuguesePortugal_Group%20Code%20of%20Conduct%20Rev3.pdf%20\(1\)%20\(1\).pdf](https://pt.airliquide.com/statics/2022-07/2022_PortuguesePortugal_Group%20Code%20of%20Conduct%20Rev3.pdf%20(1)%20(1).pdf))
- Air Liquide Principles of Action
- Principles of Action Rev 2.pdf
- Air Liquide Anti-Bribery Conduct Code
(https://pt.airliquide.com/statics/2021-10/codigo_anticorrupcao_interno_2019.pdf)
- Air Liquide Suppliers Code of Conduct
(https://pt.airliquide.com/statics/2021-06/codigo_conduta_fornecedores.pdf)
- Air Liquide Bluebook: (<https://sites.google.com/a/airliquide.com/cp-ww-bluebook/home>)
 - Chapter 2: Risk Management, Internal Control, Audit
 - Chapter 3: Legal
 - Chapter 4: Finance
 - Chapter 5: Operations Control
 - Chapter 10: Procurement
 - Chapter 14: Capital Implementation
 - Chapter 15: Corporate Social Responsibility
- Air Liquide Ethics Training Program
- HR Policies and Disciplinary Measures
- Internal Control and Risk Assessment and Risk Management Direction
- Use of KD Prevent before contracting
- Whistleblower channel: EthicALL: (<https://www.safecall.co.uk/en/clients/ethicall/>)

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AIR LIQUIDE PORTUGAL - PREVENTIVE AND CORRECTIVE MEASURES

Specific Preventive and Corrective Measures for each risk

| Risk | Area of activity | Preventive Measures | Corrective Measures | Preventive Measures for High Risks |
|---|---|--|--|------------------------------------|
| Agreements: JV's, acquisitions, ... | <ul style="list-style-type: none"> - GM - Commercial - Legal | <ul style="list-style-type: none"> - AL BlueBook: Chapter 2: RM_GP07 International Trade Compliance Good Practices - AL BlueBook: Chapter 2: RM_GR10 Third Party Screening Guidelines - AL BlueBook: Chapter 4: Finance Policy - AL BlueBook: Chapter 4: FI_GP09 M&A Group Procedure - AL BlueBook: Chapter 5: OPS Policy - AL BlueBook: Chapter 5: OPS_GP02 Investment Procedure Decision - AL BlueBook: | <ul style="list-style-type: none"> - AL BlueBook: Chapter 2: RM_GP07 International Trade Compliance Good Practices - AL BlueBook: Chapter 2: RM_GR10 Third Party Screening Guidelines - AL BlueBook: Chapter 4: Finance Policy - AL BlueBook: Chapter 4: FI_GP09 M&A Group Procedure - AL BlueBook: Chapter 5: OPS Policy - AL BlueBook: Chapter 5: OPS_GP02 Investment Procedure Decision - AL BlueBook: | N.A. |

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| | | <p>Chapter 14: CI_Policy</p> <ul style="list-style-type: none"> - AL BlueBook: Chapter 15: CSR_GC04 - Anti-Corruption Code | <p>Chapter 14: CI_Policy</p> <ul style="list-style-type: none"> - AL BlueBook: Chapter 15: CSR_GC04 - Anti-Corruption Code | |
| Customer Relations | - Commercial | <ul style="list-style-type: none"> - AL BlueBook: Chapter 2: RM_GP07 International Trade Compliance Good Practices - AL BlueBook: Chapter 2: RM_GR10 Third Party Screening Guidelines - AL BlueBook: Chapter 15: RM_GP09 - Gifts Policy - AL BlueBook: Chapter 15: CSR_GC04 - Anti-Corruption Code | <ul style="list-style-type: none"> - AL BlueBook: Chapter 2: RM_GP07 International Trade Compliance Good Practices - AL BlueBook: Chapter 2: RM_GR10 Third Party Screening Guidelines - AL BlueBook: Chapter 15: RM_GP09 - Gifts Policy - AL BlueBook: Chapter 15: CSR_GC04 - Anti-Corruption Code | N.A. |
| Lobbying Activities | - Commercial | <ul style="list-style-type: none"> - AL BlueBook: Chapter 2: RM_GP07 International Trade Compliance Good Practices - AL BlueBook: | <ul style="list-style-type: none"> - AL BlueBook: Chapter 2: RM_GP07 International Trade Compliance Good Practices - AL BlueBook: | N.A. |

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| | | <p>Chapter 2: RM_GP08 Treatment Process Fraud and other deviations</p> <ul style="list-style-type: none"> - AL BlueBook: Chapter 15: CSR Policy - CSR main policies - AL BlueBook: Chapter 15: CSR_GP05 - Public Affairs - AL BlueBook: Chapter 15: CSR_GC02 - Code of Conduct 10 Key Concepts - AL BlueBook: Chapter 15: RM_GP09 - Gifts Policy - AL BlueBook: Chapter 15: CSR_GC04 - Anti-Corruptio n Code | <p>Chapter 2: RM_GP08 Treatment Process Fraud and other deviations</p> <ul style="list-style-type: none"> - AL BlueBook: Chapter 15: CSR Policy - CSR main policies - AL BlueBook: Chapter 15: CSR_GP05 - Public Affairs - AL BlueBook: Chapter 15: CSR_GC02 - Code of Conduct 10 Key Concepts - AL BlueBook: Chapter 15: RM_GP09 - Gifts Policy - AL BlueBook: Chapter 15: CSR_GC04 - Anti-Corruptio n Code | |
| Relations with Business Partners | <ul style="list-style-type: none"> - Commercial - Operations - Procurement | <ul style="list-style-type: none"> - AL BlueBook: Chapter 2: RM_GP07 International Trade Compliance Good Practices - AL BlueBook: Chapter 2: | <ul style="list-style-type: none"> - AL BlueBook: Chapter 2: RM_GP07 International Trade Compliance Good Practices - AL BlueBook: Chapter 2: | N.A. |

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| | | <p>RM_GR10 Third Party Screening Guidelines</p> <ul style="list-style-type: none"> - AL BlueBook: Chapter 2: RM_GP08 Treatment Process Fraud and other deviations - AL BlueBook: Chapter 15: CSR_GP05 - Public Affairs - AL BlueBook: Chapter 15: RM_GP09 - Gifts Policy - AL BlueBook: Chapter 15: CSR_GC04 - Anti-Corruptio n Code | <p>RM_GR10 Third Party Screening Guidelines</p> <ul style="list-style-type: none"> - AL BlueBook: Chapter 2: RM_GP08 Treatment Process Fraud and other deviations - AL BlueBook: Chapter 15: CSR_GP05 - Public Affairs - AL BlueBook: Chapter 15: RM_GP09 - Gifts Policy - AL BlueBook: Chapter 15: CSR_GC04 - Anti-Corruptio n Code | |
| Supplier Relations | - Procurement | <ul style="list-style-type: none"> - AL BlueBook: Chapter 2: RM_GP07 International Trade Compliance Good Practices - AL BlueBook: Chapter 2: RM_GR10 Third Party Screening Guidelines - AL BlueBook: Chapter 10: | <ul style="list-style-type: none"> - AL BlueBook: Chapter 2: RM_GP07 International Trade Compliance Good Practices - AL BlueBook: Chapter 2: RM_GR10 Third Party Screening Guidelines - AL BlueBook: Chapter 10: | N.A. |

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| | | <ul style="list-style-type: none"> PROC_Policy - AL BlueBook: Chapter 10: PROC_GC07 Procurement Code of Conduct - AL BlueBook: Chapter 10: GP08 Sustainable Procurement - AL BlueBook: Chapter 15: RM_GP09 - Gifts Policy - AL BlueBook: Chapter 15: CSR_GC04 - Anti-Corruption Code | <ul style="list-style-type: none"> PROC_Policy - AL BlueBook: Chapter 10: PROC_GC07 Procurement Code of Conduct - AL BlueBook: Chapter 10: GP08 Sustainable Procurement - AL BlueBook: Chapter 15: RM_GP09 - Gifts Policy - AL BlueBook: Chapter 15: CSR_GC04 - Anti-Corruption Code | |
| Business with Intermediaries | <ul style="list-style-type: none"> - Commercial - Procurement | <ul style="list-style-type: none"> - AL BlueBook: Chapter 2: RM_GP07 International Trade Compliance Good Practices - AL BlueBook: Chapter 2: RM_GR10 Third Party Screening Guidelines - AL BlueBook: Chapter 10: PROC_GP03 Supplier Qualification | <ul style="list-style-type: none"> - AL BlueBook: Chapter 2: RM_GP07 International Trade Compliance Good Practices - AL BlueBook: Chapter 2: RM_GR10 Third Party Screening Guidelines - AL BlueBook: Chapter 10: PROC_GP03 Supplier Qualification | N.A. |

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|-------------------|-------------------------------|--|--|------|
| | | - AL BlueBook: Chapter 15: CSR_GC04 - Anti-Corruption Code | - AL BlueBook: Chapter 15: CSR_GC04 - Anti-Corruption Code | |
| Imports / Exports | - Commercial - Procurement | <ul style="list-style-type: none"> - AL BlueBook: Chapter 2: RM_GP07 International Trade Compliance Good Practices - AL BlueBook: Chapter 2: RM_GP08 Treatment Process Fraud and other deviations - AL BlueBook: Chapter 10: PROC_Policy - AL BlueBook: Chapter 15: CSR_GP06 - International Trade Compliance - AL BlueBook: Chapter 15: RM_GP09 - Gifts Policy - AL BlueBook: Chapter 15: CSR_GC04 - Anti-Corruption Code | <ul style="list-style-type: none"> - AL BlueBook: Chapter 2: RM_GP07 International Trade Compliance Good Practices - AL BlueBook: Chapter 2: RM_GP08 Treatment Process Fraud and other deviations - AL BlueBook: Chapter 10: PROC_Policy - AL BlueBook: Chapter 15: CSR_GP06 - International Trade Compliance - AL BlueBook: Chapter 15: RM_GP09 - Gifts Policy - AL BlueBook: Chapter 15: CSR_GC04 - Anti-Corruption Code | N.A. |

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