



Responsible Care[®] Policy

Purpose

This policy establishes Linde's commitment to the Responsible Care[®] Guiding Principles and outlines how Linde complies with the Responsible Care Management System (RCMS) requirements set forth in the RCMS Technical Specifications.

The management system requirements in this policy enable our organization to act in accordance with the International Council of Chemical Associations' (ICCA's) Responsible Care Core Principles.

Scope

This includes all Linde companies and subsidiaries, and affiliates and joint ventures (JVs) in which a Linde company or subsidiary owns a majority interest or has operational control.

Responsible Care Principles

At Linde, as signatories to the Chemical Industry Responsible Care initiative, we are committed to the following Responsible Care Guiding Principles:

- To design and develop products that can be manufactured, transported, used, and disposed of or recycled safely.
- To work with customers, carriers, suppliers, distributors, employees, and contractors to foster the safe and secure use, transport, and disposal of chemicals and provide hazard and risk information that can be accessed and applied in their operations and products.
- To design, construct, and operate facilities in a safe, secure, and environmentally sound manner.
- To instill a culture throughout all levels of the organization to continuously identify, reduce, and manage process safety risks.
- To promote pollution prevention, minimization of waste, conservation of energy, and the responsible use of natural and other critical resources at every stage of the life cycle of products.
- To cooperate with governments at all levels and organizations in the development of effective and efficient safety, health, environmental, and security laws, regulations, and standards.
- To communicate product, service, and process risks to stakeholders, and listen to and consider their perspectives.
- To make continuous progress toward a goal of no incidents, injuries, or harm to human health and the environment from products and operations, and openly report health, safety, environmental, and security performance.
- To promote Responsible Care by encouraging and assisting other companies to adhere to these Guiding Principles.

Responsible Care Management System Requirements

Linde fulfills RCMS requirements with the following Management System attributes:

Policy, Commitment, and Leadership

Management demonstrates leadership by setting clear policies and requirements for HSE and security performance and continuous improvement. All levels of management must show visible commitment and leadership for this policy. This commitment and leadership cultivates a high level of engagement and performance among employees.

Planning

- Relevant regulations and industry standards are identified, assessed, and communicated in a timely manner.
- Product, process, and distribution risks are evaluated.
- Employee, community, and other stakeholder concerns about Linde's safety, health, environmental, and security performance are identified and assessed.
- Critical objectives and key performance indicators are established. Priorities and goals for performance improvement are set. Resource needs are identified.
- Key programs are identified, and resources are committed in an annual business SHEQ and Security Plan.

Implementation, Operation, and Accountability

- Local requirements and procedures are traceable and equivalent to global requirements.
- Effective training is developed, based on an evaluation of needs, to prepare and validate employee competency in carrying out assigned tasks in a manner consistent with Linde's HSE and security policies. Training materials and information are provided to contractors so that they can successfully conduct their work without adverse consequences to safety, health, the environment, or security.
- Employee involvement and communication mechanisms are maintained to encourage active employee participation in the development and implementation of HSE and security programs. Employees are encouraged to voice concerns and suggestions to improve these programs.
- External communications mechanisms are maintained to periodically assess stakeholders' questions and concerns. Information about product hazards and safe handling, and HSE programs and performance, including emergency preparedness plans, is provided to stakeholders, as appropriate.
- Management systems for health, safety, environment, and security, are periodically evaluated to determine if they have been properly implemented and maintained.

Performance Measurement, Corrective and Preventive Action

- Relevant measures and records are analyzed to determine performance and trends.
- HSE and security-related incidents, significant events, non-conformances, and potential non-compliances are promptly reported. These events are investigated, analyzed, and reviewed by management, as necessary, to identify the underlying causes and to initiate corrective action. Any adverse impacts are mitigated, and corrective and preventive actions are initiated, as necessary. Key findings are shared with relevant stakeholders.
- Compliance with relevant HSE and security regulations and legislation is periodically assessed. Any deficiencies are identified and promptly corrected.
- Business SHEQ plans are reviewed annually.
- Performance reviews of carriers, suppliers, distributors, customers, contractors, and third-party providers are conducted, commensurate with risk, for use in qualification.
- The effectiveness of stakeholder communications programs is evaluated regularly.

Management Review and Reporting

- Senior management periodically reviews the RCMS and takes action, as necessary, to ensure its continuing suitability, adequacy, and effectiveness. Management review addresses the possible need for changes to policy; the extent to which goals and objectives have been met; changing circumstances; the effectiveness of actions taken to manage prioritized risks; and the commitment to continual improvement.
- HSE and security performance is reported periodically to stakeholders.

Responsibilities

Executive Leadership is responsible for setting clear direction, providing commitment to Responsible Care guiding principles, and establishing values and policies that support Responsible Care. Global Safety, Health, Environment and Quality and Corporate Security establish and maintain a global management system that supports effective Responsible Care management throughout Linde. Business and Operations Management are responsible for implementing HSE and Security policies; establishing, documenting and communicating responsibilities and accountabilities to meet the HSE and security requirements that they have set; regularly monitoring KPIs of Linde operations, products and activities that can have a significant impact on HSE and Security, and evaluate performance against these measures. All employees must comply with Linde HSE and Security requirements.

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