



W.SES-1.01.00: Responsible Care® Policy

Contents

1.	Purpose	1
2.	Scope	1
3.	Roles and Responsibilities	1
4.	Definitions	2
5.	Responsible Care	2
5.1	Responsible Care Guiding Principles.....	2
5.2	RCMS Requirements	3
5.2.1	Policy, Commitment, and Leadership	3
5.2.2	Planning.....	3
5.2.3	Implementation, Operation, and Accountability.....	3
5.2.4	Performance Measurement, Corrective and Preventive Action	4
5.2.5	Management Review and Reporting	4
6.	Training.....	4
7.	Document Review and Revisions	5

1. 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 Global Responsible Care Core Principles.

2. Scope

This policy applies to Linde and its subsidiaries, including all affiliated companies and joint ventures in which Linde or a subsidiary owns a majority interest or has operational control.

3. Roles and Responsibilities

Role	Responsibility
Linde Management Committee	<ul style="list-style-type: none"> • Sets clear direction. • Provides commitment to Responsible Care Guiding Principles. • Establishes values and policies that support Responsible Care.
Global Safety, Health, Environment, and Quality (SHEQ) and Corporate Security	<ul style="list-style-type: none"> • Establishes and maintains a global management system that supports effective Responsible Care Management throughout our organization.



Role	Responsibility
Business Heads and Operations Heads	<ul style="list-style-type: none"> Establishes and maintains processes that implement Linde's Health, Safety, Environment (HSE) and Security policies. Establishes, documents, and communicates responsibilities and accountabilities to meet the HSE and security requirements they have set. Regularly monitors key performance indicators (KPIs) of Linde's operations, products, and activities that can have a significant impact on health, safety, security, and the environment, and evaluates Linde's performance against these measures.

4. Definitions

Term	Definition
Operational Control	When Linde personnel are responsible for day-to-day activities at a site location, such as directing work flow, responding to process alarms or shutdowns, and maintaining safe plant operation.
Responsible Care	A voluntary commitment by the global chemical industry to drive continuous improvement and achieve excellence in environmental, health and safety, and security performance.
Responsible Care Management System (RCMS)	Management System elements that enable an organization to comply with the RCMS requirements set forth in the RCMS Technical Specifications.
RCMS Technical Specifications	Technical specifications developed by an International Council of Chemistry Association (ICCA) member association that sets Management System requirements in their country. Established RCMS Technical Specifications are followed by companies that have committed to Responsible Care and its Core Principles. For example, the American Chemistry Council (ACC) Responsible Care Management System Technical Specification RCMS:2013 sets forth Responsible Care Management System requirements for all Responsible Care companies in the United States.

5. Responsible Care

5.1 Responsible Care Guiding 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.

5.2 RCMS Requirements

Linde fulfills RCMS requirements with the following Management System attributes:

5.2.1 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 visibly show commitment and leadership for this policy. This commitment and leadership cultivates a high level of engagement and performance among employees and is delivered through being a role model and by involving them.

5.2.2 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.

5.2.3 Implementation, Operation, and Accountability

- The internal written requirements and procedures that are developed 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 their assigned tasks in a manner consistent with Linde HSE and security policies. Training and information is provided to contractors so that they can successfully do 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 matters. Employees are encouraged to voice concerns and suggestions about these matters.
- External communications mechanisms are maintained to periodically assess stakeholders' questions and concerns. Information about product hazards and safe handling, safety, health, and environmental programs and performance, including emergency preparedness plans, is provided to stakeholders, as appropriate.



- Management System effectiveness for health, safety, environment, and security, with respect to Responsible Care, is periodically evaluated to determine if it has been properly implemented and maintained.

5.2.4 Performance Measurement, Corrective and Preventive Action

- Relevant measures and records are analyzed to determine performance and trends.
- Safety, health, environmental, 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 safety, health, environmental, and security regulations and legislation is periodically assessed. Any deficiencies are identified and promptly corrected.
- The results of the 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.

5.2.5 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.

6. Training

- Line management is responsible for ensuring new employee safety orientation/induction includes review and training on this policy.
- Training should be led by line management or a designee, with this policy and its attached training material as references.
- Re-training will be performed when this policy is revised, and may be performed during periodic safety meetings.
- Competence or training effectiveness may be evaluated by any of the following methods:
 - ◆ Instructor-led inquiry and conversation
 - ◆ Multiple choice questionnaire



7. Document Review and Revisions

Revision and Review History				
Version [X.YY]	Review / Revision Date [YYYY Month DD]	Document Owner	Approver	Revision Description
1.00	2019 June 10	Ann Seyboldt	Anne Roby	New Linde document. Replaces W.SES-1.02.00, Responsible Care® Management System.

Required Review Frequency

This policy will be reviewed every three years.