

Linde Policy Conformance with the Responsible Business Alliance® (RBA) Code of Conduct v6.0

Linde plc (together with its subsidiaries, is referenced herein as the “Company,” “Linde,” “we,” or “our”) provides this table for interested external parties, including customers and investors, to show how Linde’s policies address the issues of concern outlined in the voluntary RBA® Code of Conduct v6.0 (2018). This document is provided solely for illustrative purposes. It is not intended to create, nor does it create, any legally binding obligations on, or rights for the benefit of, Linde or any of its affiliates. It does not provide a comprehensive overview of Linde’s policies and procedures.

The RBA Code is provided in full in the left-hand column. Endnotes are as referenced in the RBA Code. In the right-hand column, Linde provides reference text from its relevant corporate policies, and/or a hyperlink to the full text of the relevant policy. At Linde, we expect the same level of commitment and conduct from our suppliers that we expect from our employees. All of our business dealings must be based on fairness, honesty, lawfulness, safety, environmental stewardship and social consciousness.

Linde plc was formed in connection with the business combination between Praxair, Inc. (“Praxair”) and Linde Aktiengesellschaft (which is now known as Linde GbmH), which was completed effective October 31, 2018. The Company has applied the phase-in reporting exemption with respect to special disclosure requirements of the Company related to conflict minerals contained in certain products manufactured by, or for, the Company. Therefore, our conflict mineral related due diligence processes as referenced in our “Conflict-Free Materials Supply Policy” (available on our website at <https://www.linde.com/-/media/linde/merger/documents/global-procurement/linde-conflict-free-materials-supply-policy.pdf>) and in Linde’s 2020 Form SD (available on our website at [www.https://lindeplc.gcs-web.com/static-files/c8728bc4-5d93-4d11-868e-1af5af84a1bf](https://lindeplc.gcs-web.com/static-files/c8728bc4-5d93-4d11-868e-1af5af84a1bf)) relate only to legacy Praxair sales and do not include sales from legacy Linde AG.

INTRODUCTION

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| | <p>The Responsible Business Alliance (RBA), formerly the Electronics Industry Citizenship Coalition (EICC), Code of Conduct establishes standards to ensure that working conditions in the electronics industry supply chain are safe, that workers are treated with respect and dignity, and that business operations are environmentally responsible and conducted ethically.</p> <p>Considered as part of the electronics industry for purposes of this Code are all organizations that may design, market, manufacture or provide goods and services that are used to produce electronic goods. The Code may be voluntarily adopted by any business in the electronics sector and subsequently applied by that business to its supply chain and subcontractors, including providers of contract labor.</p> <p>To adopt the Code and become a participant (“Participant”), a business shall declare its support for the Code and actively pursue conformance to the Code and its standards in accordance with a management system as herein.</p> | <p>Linde’s Code of Business Integrity (“our Code”) provides guidance on how we as Linde employees will conduct ourselves with each other and with customers, suppliers, governments, other businesses and our environment.</p> |
| <p>Scope</p> | <p>Participants must regard the Code as a total supply chain initiative. At a minimum, Participants shall also require its next tier suppliers to acknowledge and implement the Code.</p> | <p>Our Code applies to everyone at Linde, including directors and officers, all employees and to all of Linde’s majority-owned subsidiaries and affiliates worldwide. We also expect our subcontractors and other stakeholders to know and follow the standards described in this document as it applies to their roles.</p> |
| <p>Compliance and voluntary standards</p> | <p>Fundamental to adopting the Code is the understanding that a business, in all of its activities, must operate in full compliance with the laws, rules and regulations of the countries in which it operates.¹ The Code encourages Participants to go beyond legal compliance, drawing upon internationally recognized standards, in order to advance social and environmental responsibility and business ethics.</p> | <p>Compliance</p> <ul style="list-style-type: none"> • Linde’s Code of Business Integrity • Form SD: Linde files an annual Form SD to evidence compliance with SEC due diligence requirements for conflict-free materials supply. • Linde has issued a statement in compliance with the UK Anti-Slavery Act <p>International Standards:</p> <ul style="list-style-type: none"> • Universal Declaration of Human Rights: DIRECTORS’ REPORT AND FINANCIAL STATEMENT (IFRS) 2019: “Linde abides by the principles of the International Bill of Human Rights enacted by the United Nations” • OECD: Linde’s process has been designed to conform, in all material respects, with the framework set forth in the Organisation for Economic Co-operation and Development (“OECD”) <i>Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas</i> (OECD Guidance) and the related supplements for gold and for tin, tantalum and tungsten. • Linde has implemented a supply chain due diligence framework that includes policies guided by these standards as set forth in the RBA Code of Conduct v6.0 |

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| | <p>2) Young Workers</p> <p>Child labor is not to be used in any stage of manufacturing. The term “child” refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported. Workers under the age of 18 (Young Workers) shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. Participant shall ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students’ rights in accordance with applicable law and regulations. Participant shall provide appropriate support and training to all student workers. In the absence of local law, the wage rate for student workers, interns and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks.</p> <p>In alignment with the <i>UN Guiding Principles on Business and Human Rights</i>, the provisions in this Code are derived from key international human rights standards including the <i>ILO Declaration on Fundamental Principles and Rights at Work</i> and the <i>UN Universal Declaration of Human Rights</i>.</p> | <p>DIRECTORS’ REPORT AND FINANCIAL STATEMENT (IFRS) 2019: “Linde abides by the principles of the International Bill of Human Rights enacted by the United Nations. We prohibit any form of child labor or forced labor, including human trafficking.”</p> |
| <p>Stakeholder Engagement</p> | <p>The RBA is committed to obtaining regular input from stakeholders in the continued development and implementation of the Code of Conduct.</p> | <ul style="list-style-type: none"> • Linde engages actively with customers requesting its participation in the RBA program, including with the production of this document. • Linde describes its engagement with suppliers regarding the sourcing of conflict minerals in its supply chain in its annual Form SD. The 2020 Form SD is provided on our website. This includes actively working with the Global eSustainability Initiative (GeSI) to further develop non-conflict sourcing requirements. |
| <p>Structure</p> | <p>The Code is made up of five sections. Sections A, B, and C outline standards for Labor, Health and Safety, and the Environment, respectively. Section D adds standards relating to business ethics; Section E outlines the elements of an acceptable system to manage conformity to this Code.</p> <p>Participants are committed to uphold the human rights of workers and to treat them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker. The recognized standards, as set out in the annex, were used as references in preparing the Code and may be a useful source of additional information.</p> <p>The labor standards are:</p> | |

A: LABOR

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| | <p>1) Freely Chosen Employment Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons shall not be used. This includes transporting, harboring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. There shall be no unreasonable restrictions on workers’ freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company-provided facilities. As part of the hiring process, workers must be provided with a written employment agreement in their native language that contains a description of terms and conditions of employment prior to the worker departing from his or her country of origin and there shall be no substitution or change(s) allowed in the employment agreement upon arrival in the receiving country unless these changes are made to meet local law and provide equal or better terms.</p> | <p>The Linde Code of Business Integrity makes clear Linde’s commitment to human rights. Linde recognizes every person’s innate humanity and treats everyone with dignity and respect. In supporting the protection and promotion of human rights worldwide, Linde abides by the principles of the International Bill of Human Rights enacted by the United Nations, and does not condone nor engage in discrimination, harassment, violations of privacy, slavery or servitude, restrictions on free assembly or unfair employment practices. We prohibit any form of child labor or forced labor, including human trafficking. Linde commits to adhering to these human rights principles and expect similar standards to be observed by all with whom we conduct business. In addition, Linde issues locally-applicable Human Rights Policies.</p> |
| | <p>All work must be voluntary and workers shall be free to leave work at any time or terminate their employment. Employers and agents may not hold or otherwise destroy, conceal, confiscate or deny access by employees to their identity or immigration documents, such as government-issued identification, passports or work permits, unless such holdings are required by law. Workers shall not be required to pay employers’ or agents’ recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker.</p> | <p>The Linde Code of Business Integrity makes clear Linde’s commitment to human rights. Linde recognizes every person’s innate humanity and treats everyone with dignity and respect. In supporting the protection and promotion of human rights worldwide, Linde abides by the principles of the International Bill of Human Rights enacted by the United Nations, and does not condone nor engage in discrimination, harassment, violations of privacy, slavery or servitude, restrictions on free assembly or unfair employment practices. We prohibit any form of child labor or forced labor, including human trafficking. Linde commits to adhering to these human rights principles and expect similar standards to be observed by all with whom we conduct business. In addition, Linde issues locally-applicable Human Rights Policies.</p> |
| | <p>2) Young Workers Child labor is not to be used in any stage of manufacturing. The term “child” refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported. Workers under the age of 18 (Young Workers) shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. Participant shall ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students’ rights in accordance with applicable law and regulations. Participant shall provide appropriate support and training to all student workers. In the absence of local law, the wage rate for student workers, interns and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks</p> | <p>The Linde Code of Business Integrity makes clear Linde’s commitment to human rights. Linde recognizes every person’s innate humanity and treats everyone with dignity and respect. In supporting the protection and promotion of human rights worldwide, Linde abides by the principles of the International Bill of Human Rights enacted by the United Nations, and does not condone nor engage in discrimination, harassment, violations of privacy, slavery or servitude, restrictions on free assembly or unfair employment practices. We prohibit any form of child labor or forced labor, including human trafficking. Linde commits to adhering to these human rights principles and expect similar standards to be observed by all with whom we conduct business. In addition, Linde issues locally-applicable Human Rights Policies.</p> |

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| | <p>3) Working Hours Studies of business practices clearly link worker strain to reduced productivity, increased turnover and increased injury and illness. Working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off every seven days.</p> | Linde's Code of Business Integrity and corporate HSE Policy , as well as other corporate and country-level policies, make clear the company's commitment and management processes to address relevant areas of potential Human Rights concern. These include: Compliance with regulations including on working hours (DIRECTORS' REPORT AND FINANCIAL STATEMENT (IFRS)) |
| | <p>4) Wages and Benefits Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor will be within the limits of the local law.</p> | Linde's Code of Business Integrity : We also provide equal employment opportunity, and we recruit, hire, promote and compensate people based solely on merit and ability. |
| | <p>5) Humane Treatment There is to be no harsh and inhumane treatment including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers; nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.</p> | Linde Code of Business Integrity : Our company complies fully with applicable labor and employment laws, and we do not tolerate discrimination or harassment against anyone based on race, color, religion, gender, gender identity, national origin, age, disability, veteran status, pregnancy or sexual orientation. At Linde, you must not engage in any discriminating or harassing behavior, and you are expected to speak up of any conduct you believe to be discrimination or harassment to your manager, Human Resources representative, the Legal & Compliance department, or the Integrity Hotline. |
| | <p>6) Non-Discrimination Participants should be committed to a workforce free of harassment and unlawful discrimination. Companies shall not engage in discrimination based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training. Workers shall be provided with reasonable accommodation for religious practices. In addition, workers or potential workers should not be subjected to medical tests or physical exams that could be used in a discriminatory way.</p> | Linde Code of Business Integrity : We Embrace a Diverse and Inclusive Workplace. We believe our strength lies in the diversity of our people. Inclusion is one of our core values, and we are committed to creating and maintaining a safe, professional and inclusive work environment in which all employees are treated with respect and dignity. Our company complies fully with applicable labor and employment laws, and we do not tolerate discrimination or harassment against anyone based on race, color, religion, gender, gender identity, national origin, age, disability, veteran status, pregnancy or sexual orientation. We also provide equal employment opportunity, and we recruit, hire, promote and compensate people based solely on merit and ability. At Linde, you must not engage in any discriminating or harassing behavior, and you are expected to speak up of any conduct you believe to be discrimination or harassment to your manager, Human Resources representative, the Legal & Compliance department, or the Integrity Hotline. |

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| | <p>7) Freedom of Association</p> <p>In conformance with local law, participants shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment.</p> | <p>Linde Non-Financial Information/ 2019 DIRECTORS' REPORT AND FINANCIAL STATEMENT (IFRS) Financial Report: Linde's Code of Business Integrity and corporate HSE Policy, as well as other corporate and country-level policies, make clear the company's commitment and management processes to address relevant areas of potential Human Rights concern. These include:</p> <ul style="list-style-type: none"> Freedom of association and freedom of peaceful assembly, including freedom to choose whether to engage in collective bargaining and employees' participation in works agreements in various countries |
| <p>RBA® CODE OF CONDUCT V 6.0 (2018)</p> | | <p>Linde policy</p> |
| <p>B: HEALTH AND SAFETY</p> | | |
| | <p>Participants recognize that in addition to minimizing the incidence of work- related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. Participants also recognize that ongoing worker input and education is essential to identifying and solving health and safety issues in the workplace.</p> | <p>Linde is a Responsible Care® member and committed to its Guiding Principles. These include strong standards for health and safety for employees and customers, carriers, suppliers, distributors and contractors. Linde's internal Safety, Health and Environmental Management System and HSE Policy are based on compliance with laws and on Responsible Care® (which includes safety and health).</p> |
| | <p>Recognized management systems such as OHSAS 18001 and ILO Guidelines on Occupational Safety and Health were used as references in preparing the Code and may be a useful source of additional information.</p> <p>The Health and Safety Standards are:</p> | <ul style="list-style-type: none"> Linde's HSE management system conforms to the Responsible Care Management System® and is externally certified to this in the USA and to international standards including OHSAS in other key markets in APAC and EMEA. Information is provided in the Linde Sustainable Development Reports. |
| | <p>1) Occupational Safety</p> <p>Worker potential for exposure to safety hazards (e.g., chemical, electrical and other energy sources, fire, vehicles, and fall hazards) are to be identified and assessed, and controlled through proper design, engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tagout), and ongoing safety training. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained, personal protective equipment and educational materials about risks to them associated with these hazards.</p> <p>Reasonable steps must also be taken to remove pregnant women/nursing mothers from working conditions with high hazards, remove or reduce any workplace health and safety risks to pregnant women and nursing mothers including those associated with their work assignments, as well as include reasonable accommodations for nursing mothers.</p> | <ul style="list-style-type: none"> Linde's HSE Policy and Responsible Care Policy define Linde's commitments in this area, including to worker and contractor occupational safety. Contractor safety performance results are reported each year in the Linde Sustainable Development Reports |

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| | <p>2) Emergency Preparedness Potential emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures including: emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, clear and unobstructed egress, adequate exit facilities and recovery plans. Such plans and procedures shall focus on minimizing harm to life, the environment and property.</p> | |
| | <p>3) Occupational Injury and Illness Procedures and systems are to be in place to prevent, manage, track and report occupational injury and illness including provisions to: encourage worker reporting; classify and record injury and illness cases; provide necessary medical treatment; investigate cases and implement corrective actions to eliminate their causes; and facilitate return of workers to work.</p> | |
| | <p>4) Industrial Hygiene Worker exposure to chemical, biological and physical agents is to be identified, evaluated, and controlled according to the hierarchy of controls. Potential hazards are to be eliminated or controlled through proper design, engineering and administrative controls. When hazards cannot be adequately controlled by such means, workers are to be provided with and use appropriate. Well-maintained, personal protective equipment. Protective programs shall include educational materials about the risks associated with these hazards.</p> | |
| | <p>5) Physically Demanding Work Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks is to be identified, evaluated and controlled.</p> | |
| | <p>6) Machine Safeguarding Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers.</p> | |
| | <p>7) Sanitation, Food, and Housing Workers are to be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by the Participant or a labor agent are to be maintained to be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate lighting, heat and ventilation, individually secured accommodations for storing personal and valuable items, and reasonable personal space along with reasonable entry and exit privileges.</p> | |

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| | <p>8) Health and Safety Communication</p> <p>Participant shall provide workers with appropriate workplace health information and safety training in the language of the worker or in a language the worker can understand for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire and physical hazards. Health and safety related information shall be clearly posted in the facility – or placed in a location identifiable and accessible by workers. Training is provided to all workers prior to the beginning of work and regularly thereafter. Workers shall be encouraged to raise safety concerns.</p> | |
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| <p>RBA® CODE OF CONDUCT V6.0 (2018)</p> | <p>Linde policy</p> |
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C: ENVIRONMENTAL

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| | <p>Participants recognize that environmental responsibility is integral to producing world class products. In manufacturing operations, adverse effects on the community, environment and natural resources are to be minimized while safeguarding the health and safety of the public. Recognized management systems such as ISO 14001 and the Eco Management and Audit System (EMAS) were used as references in preparing the Code and may be a useful source of additional information. The environmental standards are:</p> | <ul style="list-style-type: none"> • Linde’s HSE management system conforms to the Responsible Care Management System® and is externally certified to this in the USA and to international standards including ISO 14001 in other key markets in APAC and EMEA. Information is provided in the Linde Sustainable Development Reports. • Linde’s HSE Policy and Responsible Care Policy define Linde’s commitments in this area, including to environment, community and natural resources. • Environmental performance targets and results are reported each year in the Linde Sustainable Development Reports |
| | <p>1) Environmental Permits and Reporting</p> <p>All required environmental permits (e.g. discharge monitoring), approvals and registrations are to be obtained, maintained and kept current and their operational and reporting requirements are to be followed.</p> | <ul style="list-style-type: none"> • Linde has a strong environmental compliance program. This is evidenced in its Linde’s HSE Policy and Responsible Care Policy. More information is provided in in the Linde Sustainable Development Reports |
| | <p>2) Pollution Prevention and Resource Reduction</p> <p>Emissions and discharges of pollutants and generation of waste are to be minimized or eliminated at the source or by practices such as adding pollution control equipment; modifying production, maintenance and facility processes; or by other means. The use of natural resources including water fossil fuels, minerals and virgin forest products, is to be conserved or [sic] by practices such as modifying production, maintenance and facility processes, materials substitution, re-use. conservation, recycling or other means.</p> | <ul style="list-style-type: none"> • Environmental performance including for pollution prevention and resource reduction are reported each year in the Linde Sustainable Development Reports |

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| | <p>3) Hazardous Substances Chemicals and other materials posing a hazard to humans or the environment are to be identified, labelled and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.</p> | <ul style="list-style-type: none"> Environmental performance including for hazardous substances are reported each year in the Linde Sustainable Development Reports |
| | <p>4) Solid Waste Participant shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non -hazardous).</p> | <ul style="list-style-type: none"> Linde has established a zero waste program and target. Results are reported each year in the Linde Sustainable Development Reports |
| | <p>5) Air Emissions Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, routinely monitored, controlled and treated as required prior to discharge. Participant shall conduct routine monitoring of the performance of its air emission control systems.</p> | <ul style="list-style-type: none"> Environmental performance including for air emissions are reported each year in the Linde Sustainable Development Reports |
| | <p>6) Materials Restrictions Participants are to adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.</p> | <p>Linde's HSE Policy and Responsible Care Policy define Linde's commitments to adhere to all applicable laws and regulations and its industry standards regarding prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.</p> |
| | <p>7) Water Management Participant shall implement a water management program that documents, characterizes and monitors water sources, use and discharge; seeks opportunities to conserve water; and controls channels of contamination. All wastewater is to be characterized, monitored, controlled and treated as required prior to discharge or disposal. Participant shall conduct routine monitoring of the performance of its wastewater treatment and containment systems to ensure optimal performance and regulatory compliance.</p> | <ul style="list-style-type: none"> Linde has established a water management program and targets. Results are reported each year in the Linde Sustainable Development Reports |

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| | <p>8) Energy Consumption and Greenhouse Gas Emissions Energy consumption and all relevant Scopes 1 and 2 greenhouse gas emissions are to be tracked and documented, at the facility and/or corporate level. Participants are to look for cost-effective methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions.</p> | <ul style="list-style-type: none"> • Energy and GHG are key management issues for Linde and it has established Sustainable Development targets to improve performance, including contractor GHG performance. • Energy and GHG performance targets have been established. Results are reported each year in the Linde Sustainable Development Reports |
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D: ETHICS

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| | <p>To meet social responsibilities and to achieve success in the marketplace, Participants and their agents are to uphold the highest standards of ethics including:</p> | <p>Linde’s Code of Business Integrity provides guidance on how we as Linde employees will conduct ourselves with each other and with customers, suppliers, governments, other businesses and our environment. While our Code cannot address every question or issue that may come up, it does provide clear guidance on many compliance and ethical challenges we may face.</p> <p>Our Code applies to everyone at Linde, including directors and officers, all employees and to all of Linde’s majority-owned subsidiaries and affiliates worldwide. We also expect our subcontractors and other stakeholders to know and follow the standards described in this document as it applies to their roles.</p> |
| | <p>1) Business Integrity The highest standards of integrity are to be upheld in all business interactions. Participants shall have a zero tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement.</p> | <p>Linde Code of Business Integrity:</p> <p>5.1 We Do Not Bribe We succeed through fair and honest dealings on the basis of our integrity, Linde’s reputation and our superior products and services. We do not seek to gain or give an unfair advantage by providing bribes or kickbacks. Such unethical and</p> |

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| | <p>2) No Improper Advantage Bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorized, given or accepted. This prohibition covers promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Monitoring and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws</p> | <p>illegal conduct can create legal exposure for the company and for you personally and can result in criminal prosecution and substantial monetary fines. We do not tolerate the use of kickbacks or bribery in any form, and we prohibit third parties acting on our behalf from giving or accepting bribes, directly or indirectly. The company does not make or allow our representatives to make facilitation payments even if such payments may be permitted under certain national laws.</p> |
| | <p>3) Disclosure of Information All business dealings should be transparently performed and accurately reflected on Participant’s business books and records. Information regarding participant labor, health and safety, environmental practices, business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain is unacceptable.</p> | <p>Linde Code of Business Integrity: 3.4 We Protect Data and Confidential Information Our company owes part of its success to the confidential and proprietary information we develop and use. Therefore, we do not share confidential information with anyone unless there is a valid business reason for them to have it and they sign a non-disclosure or a confidentiality agreement with Linde. Our responsibility to safely secure confidential and proprietary information remains in effect even after we leave the company. Additionally, we always comply with applicable laws designed to protect confidential information.</p> |
| | <p>4) Intellectual Property Intellectual property rights are to be respected; transfer of technology and know-how is to be done in a manner that protects intellectual property rights; and, customer and supplier information is to be safeguarded</p> | <p>Linde Code of Business Integrity: 3.3 We Protect Our Assets Company assets should be used for legitimate business purposes and not for any employee’s personal benefit. Damaged, stolen, misused or wasted company assets have a negative impact on all Linde stakeholders and on the company’s operational and financial performance. Assets can be physical objects, such as computers and other hardware, office furniture and the products we manufacture, as well as intangible items, such as software, intellectual property (IP), confidential business information and trade secrets. You should report suspected fraud, theft or misuse of company assets promptly to your manager or other resource in this Code.</p> |
| | <p>5) Fair Business, Advertising and Competition Standards of fair business, advertising and competition are to be upheld.</p> | <p>Linde Code of Business Integrity: 3.6 We Communicate Responsibly: All advertising, marketing and sales activities must describe our offerings and services legally, fairly and honestly, never using false, misleading or deceptive information. We also must make sure that we and our business partners use Linde trademarks consistently and appropriately</p> |
| | <p>6) Protection of Identity and Non-Retaliation Programs that ensure the confidentiality, anonymity and protection of supplier and employee whistleblowers² are to be maintained, unless prohibited by law. Participants should have a communicated process for their personnel to be able to raise any concerns without fear of retaliation</p> | <p>Linde Code of Business Integrity: 1.4 Retaliation Is Prohibited We can all report concerns and participate in official investigations without fear of punishment. Linde strictly prohibits retaliation against someone reporting an issue or concern in good faith. The company may take serious disciplinary action against employees found retaliating, up to and including termination of employment.</p> |

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| | <p>7) Responsible Sourcing of Minerals</p> <p>Participants shall have a policy to reasonably assure that the tantalum, tin, tungsten and gold in the products they manufacture does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country. Participants shall exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to customers upon customer request</p> | <ul style="list-style-type: none"> • Linde’s 2020 Form SD: Pursuant to Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Dodd-Frank Act”), the U.S. Securities and Exchange Commission (“SEC”) has adopted rules imposing SEC reporting requirements upon publicly-traded companies whose products contain metals derived from minerals defined as “conflict minerals.” Conflict minerals include wolframite (tungsten), cassiterite (tin), coltan (tantalum) and gold. Linde uses these minerals in producing certain products and applications for customers within the electronics, aerospace, oil and gas and other industries. • Conflict-Free Materials Supply Policy: Linde takes seriously the global concern that minerals mined from some sources within the Democratic Republic of the Congo or its adjoining countries (the “conflict region”), that benefit armed groups, may be making their way into the general industry supply chain, and that profits from this could potentially contribute to human rights violations and has implemented a policy regarding the sourcing of conflict minerals in our supply chain. |
| | <p>8) Privacy</p> <p>Participants are to commit to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers and employees. Participants are to comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.</p> | <p>Linde Code of Business Integrity:</p> <p>1.8 We Protect Privacy In the course of doing business, we collect and manage the personal information of employees and our customers, suppliers and others. Our careful handling of this personal information is one of the reasons we are a trusted employer and business partner. Our company complies with all privacy laws in the countries in which we do business, and we acquire, process, use and retain only the personal data that is required for effective company operations to the extent allowed by applicable law.</p> |

E: MANAGEMENT SYSTEM

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| | <p>Participants shall adopt or establish a management system whose scope is related to the content of this Code. The management system shall be designed to ensure: (a) compliance with applicable laws, regulations and customer requirements related to the participant’s operations and products; (b) conformance with this Code; and (c) identification and mitigation of operational risks related to this Code. It should also facilitate continual improvement. The management system should contain the following elements:</p> | <ul style="list-style-type: none"> • 2020 Form SD describes Linde’s policies and management system regarding conflict minerals • Conflict-Free Materials Supply Policy: “In furtherance of our goal of utilizing “conflict-free” materials, Linde has developed procedures that will communicate our expectation that suppliers of conflict minerals (1) will implement due diligence processes to determine the origin of raw materials within their supply chain, and (2) will not supply to Linde 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.” |
| | <p>1) Company Commitment A corporate social and environmental responsibility policy statements affirming Participant’s commitment to compliance and continual improvement, endorsed by executive management and posted in the facility in the local language.</p> | <ul style="list-style-type: none"> • 2020 Form SD describes Linde’s policies and management system regarding conflict minerals • Conflict-Free Materials Supply Policy: Policy is posted on Linde’s website and the company intranet. • Health, Safety & Environment Policy is posted on Linde’s website, and its policy conformance with Responsible Care. |
| | <p>2) Management Accountability and Responsibility The Participant clearly identifies senior executive and company representative[s] responsible for ensuring implementation of the management systems and associated programs. Senior management reviews the status of the management system on a regular basis.</p> | <ul style="list-style-type: none"> • 2020 Form SD describes Linde’s policies and management system regarding conflict minerals • Conflict-Free Materials Supply Policy. The Vice President of Global Procurement is the executive with ultimate responsibility for this policy, and it is managed by a senior manager within the Global Procurement department in Linde. |
| | <p>3) Legal and Customer Requirements A process to identify, monitor and understand applicable laws, regulations and customer requirements, including the requirements of this Code.</p> | <ul style="list-style-type: none"> • 2020 Form SD describes Linde’s policies and management system regarding conflict minerals • See also section above: Compliance and voluntary standards |
| | <p>4) Risk Assessment and Risk Management A process to identify the legal compliance, environmental, health and safety³ and labor practice and ethics risks associated with Participant’s operations. Determination of the relative significance for each risk and implementation of appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.</p> | <ul style="list-style-type: none"> • Linde’s 2020 Form SD: Linde’s first step in the reasonable country of origin inquiry process was to review its worldwide purchases to identify product lines where necessary conflict minerals may be used within the Praxair legacy business. Consistent with prior years and after analyzing various approaches, Linde decided to use a “parts-centric approach” to identify products that may contain necessary conflict minerals by reference to product bills of material or engineering specifications, and by engaging internal business experts. By taking this approach, we were able to target specific suppliers for further inquiry • Linde’s Responsible Care Policy includes commitments to risk assessment, performance management, performance review and corrective and preventive action in relation to safety, health, environment and security compliance. |

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| | <p>5) Improvement Objectives Written performance objectives, targets and implementation plans to improve the Participant’s social and environmental performance, including a periodic assessment of Participant’s performance in achieving those objectives.</p> | <p>Conflict-Free Materials Supply Policy Suppliers of conflict minerals must submit written evidence of due diligence documentation to Praxair which may include completing the standardized Responsible Minerals Initiative Conflict Minerals Reporting Template (CMRT) 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.</p> |
| | <p>6) Training Programs for training managers and workers to implement Participant’s policies, procedures and improvement objectives and to meet applicable legal and regulatory requirements.</p> | <p>Linde employees and contractors receive an average of 40 hours a year safety training. This metric is reported each year in the Linde Sustainable Development Reports</p> |
| | <p>7) Communication A process for communicating clear and accurate information about Participant’s policies, practices, expectations and performance to workers, suppliers and customers</p> | <p>Conflict-Free Materials Supply Policy: “Linde will communicate this policy to our suppliers and encourage them to adopt similar policies with respect to conflict minerals and due diligence frameworks for their supply chains.”</p> |
| | <p>8) Worker Feedback, Participation and Grievance Ongoing processes, including an effective grievance mechanism, to assess employees’ understanding of and obtain feedback on or violations against practices and conditions covered by this Code and to foster continuous improvement.</p> | <p>Code of Business Integrity: The Company’s external website allows both internal and external parties to report suspected violations of Company policies, anonymously if desired.</p> |
| | <p>9) Audits and Assessments Periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of the Code and customer contractual requirements related to social and environmental responsibility</p> | <p>Conflict-Free Materials Supply Policy “Suppliers of conflict minerals must submit written evidence of due diligence documentation to Praxair which may include completing the standardized RBA/GeSI Conflict Minerals Reporting template or other certifications.”</p> |
| | <p>10) Corrective Action Process A process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations and reviews.</p> | <p>Conflict-Free Materials Supply Policy “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 our Code of Business Integrity or our commitment to human rights, we will reassess our business relationship with such supplier.”</p> |
| | <p>11) Documentation and Records Creation and maintenance of documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.</p> | <p>Linde Code of Business Integrity: Managing Records: A strong records management program helps our company keep its commitment to safeguard our business information and that of our business partners.</p> |
| | <p>12) Supplier Responsibility A process to communicate Code requirements to suppliers and to monitor supplier compliance to the Code.</p> | <p>Conflict-Free Materials Supply Policy “Praxair will communicate this policy to our suppliers and encourage them to adopt similar policies with respect to conflict minerals and due diligence frameworks for their supply chains.”</p> |

¹ The Code is not intended to create new and additional third-party rights, including for workers.

² Whistleblower definition: Any person who makes a disclosure about improper conduct by an employee or officer of a company, or by a public official or official body.

³ Areas to be included in a risk assessment for environmental health and safety are production areas, warehouse and storage facilities, plant/facilities support equipment, laboratories and test areas, sanitation facilities (bathrooms), kitchen/cafeteria and worker housing/dormitories.