



## Linde Supplier Code of Conduct

### Introduction

Linde is a leading global industrial gases and engineering company, committed to making our world more productive. Our goals extend far beyond simply what we do, because how we do things is equally important, recognizing that we have ethical and social responsibilities. At Linde we take these responsibilities seriously and expect the same from those that we do business with.

### Expectation

Suppliers, Contractors and third parties (“Suppliers”) play a critical role in Linde’s ability to operate and provide products and services to its customers.

Suppliers actions and practices also reflect on Linde. Therefore, the company chooses Suppliers carefully based on merit and a due diligence process. Linde expects Suppliers to comply with legal requirements and to act in a manner that is consistent with Linde’s values and the principles outlined in its Code of Business Integrity.

This Supplier Code of Conduct (“Supplier Code of Conduct”) defines Linde’s minimum requirements for our Suppliers concerning their responsibilities towards Linde and its stakeholders, societies and the environment.

As part of the standard documentation for all new and renewing contracts, Suppliers must confirm conformance with this Supplier Code of Conduct and with Linde’s Code of Business Integrity (CBI) or equivalent policies of their own.

Linde is committed to maintaining long-term relationships with our Suppliers where they contribute continued business value. Certain Suppliers are audited on a planned schedule and on a broad scope. If deviations are discovered, Linde is committed to work with Suppliers on remedies through capacity building, education, and training. Continued, severe and/or willful non-conformance are grounds for contract termination.

### Integrity and Legal Compliance

Suppliers are expected to:

- Comply with all applicable laws and regulations.
- Prohibit bribery or corruption in any form, including bribes, facilitation payments, kickbacks, grease payments and other improper influence of decision makers, whether directed to government officials or otherwise.

- Not violate competition and antitrust laws or any other unlawful restrictions of fair competition; price fixing, market or customer allocation, market sharing or bid rigging with competitors.
- Comply with applicable trade compliance regulations (e.g. laws, regulations, orders regarding the export and import of goods and technology)
- Ensure personal data is processed in compliance with applicable laws and subject to an adequate system to ensure appropriate protection against unauthorized or unlawful processing, loss, alteration, misuse, disclosure or other transmission.
- Ensure that no prohibited materials are present or used in its products or supply chain, including minerals sourced from conflict areas.
- Have a process in place to train their employees on the topics references in the Linde CBI or its equivalent, particularly on Ethics & Integrity / anti-corruption and bribery, at least every three years.

### Human Rights and Labor Standards

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 and expect similar standards to be observed by all with whom we conduct business.

Suppliers are expected to:

- Prohibit Child Labor and comply with minimum working age requirements prescribed by national laws and international conventions.
- Prohibit any form of Forced Labor, including forced prison labor, indentured labor, bonded labor, slave labor or any form of human trafficking.
- Promote non-discrimination and respect for employees: All employees must be treated with dignity and respect. Principles of equal opportunity and treatment of employees to be applied, irrespective of skin color, race, nationality, ethnicity, political affiliation, social background, disabilities, gender, sexual identity and orientation, marital status, religious conviction, or age.
- Comply with the applicable law and sector-specific labor regulations concerning working time, including overtime laws.
- Provide wages and benefits at least as prescribed by the respective national laws, including minimum wage legislation, and in line with existing practice in the industry and local labor markets.
- Recognize, as far as legally permitted, the right of free association and collective bargaining of employees.

## Health, Safety and Environment

Linde's worldwide Health, Safety & Environment ("HSE") policy reinforces its ambition of zero incidents causing harm to people, communities, or the environment. Safety is a core value for Linde and is always a first expectation. Linde continuously works to improve its safety culture and performance worldwide. Linde's Health, Safety and Environmental Policy and Safety Principles is posted on the company website.

Suppliers are expected to:

- Comply with applicable health, safety and environmental laws, regulations, and Linde policies.
- Stop a job or refuse to perform it if it cannot be performed safely.
- Embrace our Safety principles and reflect them in every aspect of work they perform
- Commit to continuous improvement of occupational health and safety and environmental protection.
- Use or establish an appropriate occupational health and safety and environmental management system, which will include regular employee training on such standards.
- Support Linde's programs and targets related to climate change, environmental stewardship and sustainability.

## Accuracy of Books and Records

All Suppliers' financial books and records will conform to generally accepted accounting principles, business records will be complete, legible, transparent, and reflect actual transactions and payments.

## Intellectual Property

Supplier will not, without Linde's express prior written agreement, share with any third party any of Linde's intellectual property or confidential information, including products, costs, prices, strategies, processes, or other know-how.

## Supply chain

Supplier will undertake reasonable efforts to encourage your own suppliers and sub-contractors to comply with the principles of Linde's Supplier Code of Conduct.

## Grievance Mechanism

Internal and external parties can report suspected violations of Linde policies, anonymously if desired, at [integrity@linde.com](mailto:integrity@linde.com)

Signed

Christoph Clausen, VP Global Procurement – Munich October 26th, 2020