



## Linde Conflict-Free Materials Supply Policy

### Scope

Global. Applicable to relevant suppliers and their suppliers.

### Conflict Minerals Regulation

Pursuant to

- i. 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."
- ii. EU Regulation 2017/821 of the European Parliament and of the Council of the European Union laying down supply chain due diligence obligations for European Union importers of tin, tantalum and tungsten, their ores and gold ("conflict minerals") originating from conflict-affected and high-risk areas.

Conflict minerals include wolframite (tungsten), cassiterite (tin), coltan (tantalum), their ores and gold.

Linde uses these minerals in producing certain products and applications for customers within the electronics aerospace, oil and gas and other industries.

Linde takes seriously the global concern that minerals mined from some sources within the Democratic Republic of the Congo, its adjoining countries or other conflict-affected and high-risk areas (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.

### Commitment to Responsible Sourcing

Due to the complexities of the mining process and because Linde does not purchase minerals directly from smelters or mines, it must rely on sourcing information provided by our suppliers. Linde is committed to socially responsible sourcing and supports the humanitarian goals of the above-mentioned regulations, the Responsible Minerals Initiative and the development of regulations and processes for suppliers to determine whether materials within their supply chain are sourced from the conflict region. Guided by the Organization for Economic Cooperation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Linde has adopted this Conflict Materials Supply Policy and has implemented a supply chain due diligence framework that includes policies similar to those set forth in the Responsible Business

Alliance (formerly the Electronics Industry Citizenship Coalition (EICC)) Code of Conduct. Linde also works with the Global Sustainability Enabling Initiative (GeSI) to further develop non-conflict sourcing requirements.

### Supplier Expectations

Linde's Supplier Code of Conduct outlines our goal of developing long-term and mutually beneficial supplier relationships based on strong performance standards. It requires that our suppliers engage in dealings based on fairness, honesty, lawfulness, safety, environmental stewardship and social consciousness equivalent to the values and standards set forth in Linde's Code of Business Integrity which includes a commitment to human rights. In addition, Linde expects its suppliers or potential suppliers of conflict minerals or other materials, and their sub-suppliers, to only source materials from environmentally and socially responsible sources.

In furtherance of our goal of utilizing "conflict-free" materials, Linde has developed procedures that 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. Suppliers of conflict minerals must submit written evidence of due diligence documentation to Linde which may include completing the standardized Responsible Minerals Initiative Conflict Minerals Reporting Template (CMRT) or other certifications. If Linde 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 Linde's Code of Business Integrity and our commitment to human rights, we will reassess our business relationship with such supplier.

Conformance with this policy is a requirement of all suppliers, or potential suppliers, of conflict minerals.

Linde continues to communicate this policy to our suppliers and encourages them to adopt similar policies with respect to conflict minerals and due diligence frameworks for their supply chains.

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