The Linde Group Golden Rules of Safety

Purpose

This document describes The Linde Group Golden Rules of Safety.


Scope

This document applies globally to all Global and Regional Business Units, Divisions and Companies where The Linde Group has management responsibility. Relevant Golden Rules also apply to all Business Areas and Global Support Functions.

Audience

The Golden Rules of Safety apply to all Linde Group employees, those providing contract services to Linde and visitors to our sites.
Introduction

Safety

Safety is one of our company’s four foundational principles which underpin our decisions, actions and behaviours, as defined in VVP-00-01: The Linde Spirit. Our commitment to Safety is evident in our VVP-02-01: HSE Policy.

Safety is a basic pre-requisite for us all and any business activity we undertake. Everyone who works for, or with, The Linde Group is responsible for their own personal safety and also must take care for the safety of those around them. In addition, Line Managers have specific responsibilities for employees and other people working under their direct supervision.

Every employee, contractor, or any other person involved with The Linde Group (e.g. our customers, neighbours and other third parties) must be able to go about their work or business without being harmed.

Safety is a key element of becoming a High Performance Organisation and a Leading company.

Purpose of the Golden Rules of Safety

The aim of the Golden Rules is to prevent severe injuries and fatalities, and to support the journey towards a Leading HSE performance and culture.

The Golden Rules are based on incidents and experiences in our company and also reflect legal and regulatory requirements that apply in many of the countries in which Linde operates.

The Golden Rules reinforce those critical areas of our management system that present a high risk of severe injury or fatality if not followed. Therefore, they must be adhered to at all times by everyone. In addition, local regulations and other Linde specific requirements must also be applied.

Disregard of the Golden Rules will be dealt with by line management and HR in the same manner as any other serious misconduct or breach of a Linde policy or rule.

Personal Ownership for Safety

Golden Rule 1, on the topic of Personal Ownership for Safety, reflects the high value we place on peoples’ safety in Linde and our aim to achieve zero fatalities and zero incidents.

This Golden Rule is also embedded in our Linde Group HSE policy, as one of our four policy principles.

It is different to the other Golden Rules (which describe high risk activities and key processes of our safety management system) in that it sets out clear underlying behavioural expectations for each and everyone who works for Linde and with Linde.

This Golden Rule defines the behaviours that we must all consistently demonstrate to make safety in Linde 100% of our behaviour, 100% time.

If we are found negligent in respect of any the points covered by Golden Rule No. 1, and there has been a serious incident as a result, or someone’s safety has been put at-risk, then this will be dealt with in exactly the same manner as any other non-compliance, depending on the specific circumstances of the individual case and the actual and potential consequences of the act or omission.
Responsibilities

Business Heads

- **Must** ensure The Golden Rules of Safety are fully communicated and embedded in their organisations such that they support the development of an 'interdependent' safety culture.
- **Must** regularly review significant incidents relating to Golden Rules to confirm that appropriate actions have been taken (e.g. learning from incidents shared, consequence management applied and systems failures corrected).

HR Heads

- Should ensure an effective consequence management process exists to support the Golden Rules.
- This process should include assessment of all relevant factors, both personal and organisational, and apply appropriate and consistent consequence measures.
- The consequence measures should be applied to those people responsible at the appropriate levels of the organisation.

Managers/Supervisors

- **Must** communicate the Golden Rules requirements to all employees and contractors (and any third parties visiting our sites as applicable) in their area of responsibility to ensure that:
  - their subordinates know and understand the Golden Rules.
  - both short and long term contractors know, understand and comply with the relevant Golden Rules.
- **Must** ensure on-going compliance with Golden Rules by communication and coaching, positive reinforcement and application of consequence management, as appropriate.
- **Must** ensure their own behaviours comply with and actively promote the principles and requirements of the Golden Rules.

SHEQ Heads

- **Must** ensure the Golden Rules are sustainable by implementing actions such as integration of Golden Rules into new/transferred employee induction processes, contractor supplier agreements and induction processes etc.
- **Must** ensure implementation and maintenance of the relevant key Safety Management System standards.

Employees

- **Must** ensure they understand the requirements of the Golden Rules that are applicable to their daily work.
- **Must** ensure their own safety behaviours and actions comply with the Golden Rules at all times.

Contractors

- **Must** ensure they understand and comply with the Golden Rules at all times whilst working for Linde.
The Golden Rules of Safety

Principles and basic requirements

The principles and basic requirements of the Golden Rules of Safety are described and summarised in this section. However, the detailed requirements relating to each Golden Rule are contained within the relevant Linde Group global safety standards within LiMSS (Linde Management System and Standards) and are listed at the end of this document.

1. Personal Ownership for Safety
   We will consistently demonstrate personal ownership and accountability for safety through our actions and behaviours.

2. Driving & Vehicles
   We will operate our vehicles safely and responsibly at all times and use the safety equipment provided.

3. Permit to Work
   We will use the Permit to Work system where necessary to ensure hazards and risks are understood and controlled.

4. Working at Height
   We will only work at height when the required safety measures to prevent falls are in place.

5. Lifting Operations
   We will ensure lifting operations utilising cranes or other lifting devices are carried out safely.

6. Contractor Management
   We will select and manage our contractors so that they meet Linde Group’s safety requirements.

7. Engineering Management of Change (EMOC)
   We will only proceed with technical changes to process plants and process equipment when an Engineering Management of Change process addressing the safety risks has been completed.

8. Incident Reporting
   We will report and investigate incidents so that the causes can be identified and corrected, and learning shared.
1. Personal Ownership for Safety

Golden Rule 1

We will consistently demonstrate personal ownership and accountability for safety through our actions and behaviours.

The following behavioural expectations and commitments apply to all people who work with and for Linde:

- We will **ONLY** undertake a task if it is safe, in accordance with procedures and we have been trained and authorised to do it.
- Before starting a task we will **ALWAYS** ask – what are the significant hazards & risks, are they under control, has anything changed since last time?
- We will **ALWAYS** comply with the established rules, standards and procedures and will **NEVER** take short-cuts.
- We will **ALWAYS** stay alert, continually assess the risks and **NOT** be complacent.
- We will **ACT IMMEDIATELY** when we observe at-risk behaviours or conditions in order to control the risks.
- We will **STOP** the job immediately, if we are in doubt, or if we feel the situation is unsafe, and seek help from a colleague, supervisor or manager.
- We will **ALWAYS** consider the safety of other people and **NOT** put them at risk by our actions, behaviours or decisions.

In addition, as Managers and Supervisors we will consistently demonstrate behaviours that contribute to building a positive and proactive safety culture, specifically:

- We will be a visible role model at ALL times conveying the value we place on safety.
- We will demonstrate immediate personal interest in ALL incidents, near misses and hazardous situations.
- We will ensure corrective and preventive actions are effective and closed-out on-time to prevent recurrence.
- We will maintain open and honest two-way communication about safety, focusing on key risk exposures and controls.
- We will engage in regular Safety Dialogues and Workplace Inspections when visiting Linde locations in order to manage risks proactively.
- We will actively sponsor and participate in HSE activities and programmes.
- We will actively manage consequences of both safe and unsafe behaviours, including recognition, coaching and formal discipline.
2. Driving and Vehicles

Golden Rule 2

We will operate our vehicles safely and responsibly at all times and use the safety equipment provided.

- We will not drive when we are suffering from fatigue or tiredness
- We will always comply with the legal or Linde requirements of driving, working and rest hours
- We will not drive under the influence of alcohol or drugs
- We will ensure that our vehicles are fit for purpose and in safe working order
- We will ensure that our vehicles do not exceed manufacturer’s load specifications and that loads are correctly secured
- We will wear seatbelts in all seating positions at all times whilst the vehicle is moving
- We will operate our vehicles within the speed limit and at speeds that are safe for the prevailing weather, traffic or road conditions
- We will remain in control of our vehicle at all times
- We will not use communication devices when driving, such as mobile phones, smart phones and two-way radios

3. Permit to Work

Golden Rule 3

We will use the Permit to Work system where necessary to ensure hazards and risks are understood and controlled.

For hazardous work, we will obtain a Permit to Work before work commences and comply with it.

- Our Permits will define the scope of work, hazards and risk controls, and will be issued by authorised persons
- We will ensure that the Permits, and the risk controls, are in place and communicated to all impacted before the work commences
- We will monitor the work during its execution, at a frequency based on the risk
- We will close Permits before normal operational conditions are re-established
- We will identify suitable methods of Energy Isolation and these will be executed by an authorised person, using a system of physical locks and tags appropriate to the level of risk
- We will not enter Confined Spaces until all potential risks have been identified and risk control measures put in place by an authorised person

4. Working at Heights

Golden Rule 4

We will only work at height when the required safety measures to prevent falls are in place.

We will only work at heights of 2 metres or more above the ground when:

- We have assessed risks and established suitable safety controls and safe methods of work, typically under a Permit to Work
- We have put in place special equipment suitable for the task, such as scaffolding, mobile access platforms or fall arrest equipment, and these have been verified by a competent person with regards to design, installation and condition
- We have verified that all persons working at heights are competent to perform the work
5. Lifting Operations

Golden Rule 5

**We will ensure lifting operations utilising cranes or other lifting devices are carried out safely.**

We will only conduct lifting operations under the following circumstances:

- We have assessed the risks and established suitable safety controls, either:
  - under a Permit system by an authorised person, taking into account the lift method, the equipment, responsibilities and communications (typically for higher risk or more complex lifts involving specialised equipment), or
  - under an approved Work Method, Work Procedure or Instruction (typically for routine lifts of low or insignificant risk)
- We have verified that operators and other people involved in the lifting operation (e.g. riggers of the load) are competent and authorised for the lifting equipment and lift method to be used
- We have determined that the lifting equipment is “fit for purpose” in terms of its design, load capacity, condition and test status

6. Contractor Management

Golden Rule 6

**We will select and manage our contractors so that they meet Linde Group’s safety requirements.**

Where we contract out work on our sites, facilities, construction sites, as well as at customer locations and for transport, our contractors are responsible for the work they perform. However, we retain overall accountability for safety.

Our Contractor Management processes will include the following:

- We will select internally approved contractors who are competent to safely perform the work specified
- We will verify risk assessments of work to be done by contractors to identify key hazards and risk control measures
- We will verify that our contractors’ employees are inducted and trained in the relevant hazards and safety requirements of the work, including specialist training where necessary
- We will monitor and supervise the contractors during the work at a frequency determined by the level of risk
- We will review contractor safety performance at an appropriate frequency
7. Engineering Management of Change

Golden Rule 7

We will only proceed with technical changes to process plants and process equipment when an Engineering Management of Change process addressing the safety risks has been completed.

We will only undertake temporary or permanent technical changes when:

- We have undertaken a Risk Assessment of the proposed changes, assessing the potential impact on safety during the change itself and after it has been executed
- We have defined appropriate risk control actions, including responsibilities and timescales for implementation, covering the following:
  - Equipment, facilities and processes
  - Work Instructions and Procedures
  - Training of personnel and communications
  - Other documentation and records, such as updating of P&IDs
- We have ensured that the Risk Assessment and risk control actions have been approved by a competent and authorised person at the appropriate level of the organisation

8. Incident Reporting

Golden Rule 8

We will report and investigate incidents so that the causes can be identified and corrected, and learning shared.

- We will report all of the following categories of incidents involving employees, contractors and third parties (related to Linde business activities) to a responsible Linde person (e.g. a supervisor or manager):
  - Fatal incidents
  - Incidents involving employees and contractors resulting in time off work or some form of medical treatment
  - All incidents/events that had potential to cause severe injury or fatality
- We will carry out appropriate investigations and root cause analysis to ensure learning from incidents is identified and shared, so that repeat incidents are prevented
- If we observe an unsafe condition or act that has potential to cause significant harm to people, we will immediately take the necessary corrective actions and report it
**LiMSS references**

Further detailed guidance on Linde Group safety standards related to the Golden Rules can be obtained from the following documents:

<table>
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<th>Golden Rule</th>
<th>Relevant LiMSS standard</th>
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<tbody>
<tr>
<td>1. Personal Ownership for Safety</td>
<td>The Linde Group Golden Rules of Safety (this standard)</td>
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<tr>
<td>2. Driving and Vehicles</td>
<td>DEL-01-01 : Driver and Vehicle Safety</td>
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<td>3. Permit to Work</td>
<td>IMS-26-03 : Permit to Work System</td>
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<td>4. Working at Heights</td>
<td>IMS-26-19 : Safe Management of Work at Height</td>
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<td>IMS-26-24 : General Requirements for Mechanical Lifting</td>
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<td>6. Contractor Management</td>
<td>IMS-32-01 : Contractor Selection and Management</td>
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<td>8. Incident Reporting</td>
<td>IMS-24-01 : Incident Management</td>
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**Attachments**

- *Golden Rules of Safety – Update (see attachment).*
Document Information

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<th>Author</th>
<th>Quality Reviewer</th>
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Change History

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<td>3.1</td>
<td>Changed HSE logo to reflect new logo – “It’s about your Life”.</td>
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<tr>
<td>3.0</td>
<td>New item added to Golden Rule 2.</td>
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<tr>
<td>2.0</td>
<td>Addition of Golden Rule 1 – Personal Ownership for Safety.</td>
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<td></td>
<td>Incident Reporting moved to Golden Rule 8.</td>
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<td></td>
<td>Changes to descriptions for Golden Rules 2, 6, 7, 8.</td>
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Learning and Assessment Guide

IMS-01-03-GROUP : The Linde Group Golden Rules of Safety

Prerequisites

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<th>As a result of training in the content of this document you will be able to:</th>
<th>Learning method:</th>
<th>Assessment method:</th>
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<td>Know, understand and comply with The Linde Group Golden Rules of Safety.</td>
<td>Self study</td>
<td>Multi-choice test</td>
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Assessment Complete | Sign | Date |

Learner: 

Assessor: 

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