

The Linde Group Health, Safety and Environment (HSE) Policy

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Purpose

Purpose

This standard describes the Health, Safety and Environment (HSE) policy for The Linde Group.

Maintenance and review of HSE Policy

The Linde Group HSE policy will be reviewed for suitability every 3 years. This review will be initiated and conducted by The Linde Group Head of HSE, who will communicate the recommendations of the review to the Executive Board of The Linde Group and seek their approval for any changes.

Scope

Scope

This policy applies to The Linde Group worldwide.

Audience

This policy applies to all employees in The Linde Group.

Managers **must** ensure that their subordinates know and understand the requirements of the HSE policy. All managers should demonstrate the importance of the HSE policy by ensuring that their own behaviour actively promotes the desired values and principles.

All employees should ensure that they understand the policy and its implications for them.

The policy is also applicable to our business partners, for example, our contractors, suppliers, joint venture partners and other relevant business partners, when undertaking services for or on behalf of The Linde Group. Managers **must** ensure that the HSE policy is communicated to our business partners and that they actively co-operate with Linde to achieve compliance with the policy.

Review period

The review period for this document is 3 years from the date of last issue.

Health, Safety and Environment (HSE) Policy.
The Linde Group will avoid harm to people, society and the environment.

Leading.



Our principles:

- Health, safety and care for the environment are foundational principles of our businesses.
- The health and safety of our colleagues, customers, business partners and communities in which we do business is our number one priority.
- Personal ownership for HSE through visible, demonstrated leadership and accountability at all levels throughout The Linde Group.
- HSE principles shall be reflected in 100% of our behaviour, 100% of the time.

Our vision:

- Zero incidents.
- Safe, secure and healthy working conditions for all who work with and for us.
- High quality, safe and environmentally responsible products and services that meet or exceed the expectations of our customers.
- Responsible use of natural resources.
- Economic and environmental sustainability in everything we do.

Our commitment:

- Comply with applicable legal, regulatory, industry and corporate requirements.
- Design, construct and operate our facilities in a safe, secure, efficient and environmentally responsible way.
- Personal accountability to continuously improve our HSE performance through tracking against our goals and targets.
- Proactive management of risk in our business.
- Work with our business partners and our relevant industries to actively promote and enforce compliance with this policy.
- Promote open communication and learning with all stakeholders and sharing of HSE knowledge.
- Provide resources, training, equipment and other support to enable fulfilment of this policy.

This policy is integral to The Linde Group strategy and is periodically reviewed by the Executive Board. The Executive Board is committed to the implementation of this HSE policy.


Dr Wolfgang Büchele


Thomas Blades


Dr Christian Bruch


Georg Denoke


Bernd Eulitz


Sanjiv Lamba



Policy Guidelines

Our Vision

The Linde Group will avoid harm to people, society and the environment.

The Linde Group's aspiration is to be the world's leading gases and engineering company. This requires us to exhibit behaviours and values that reflect that we place the highest value on avoiding harm to people, society and the environment at all times.

We want everyone to think through the safety, security, health and environmental aspects of every decision they make at work, while travelling or at home, and help others to do likewise.

Our Principles

Our principles

To achieve our vision, we The Linde Group are committed to the following HSE principles:

Health, safety and care for the environment are foundational principles of our businesses

- The Linde Spirit defines our company's culture, who we are, what we expect and desire of our people. More specifically, it defines the company's vision, values and principles that we believe are vitally important to its success (see [VVP-00-01 : The Linde Group Values and Policies](#)).
- Two of the four foundational principles of The Linde Spirit are Safety and Sustainability; they help to guide our decisions and actions and are further supported by the HSE policy. Together they influence the way we behave, the way we interact with one another and the way we deal with our customers and other stakeholders.

The health and safety of our colleagues, customers, business partners and communities in which we do business is our number one priority

- We will not disregard HSE risks for the sake of increased profit. If there is a conflict between increased profit and risk of harm to people, society or to the environment, then HSE considerations will always be the number one priority.
- We **must** demonstrate that health, safety and care for the environment are as important as production, costs and business performance. In most cases the safest way of doing things will eventually result in better business performance.
- Number one priority means that HSE **must** always be our top priority to manage risk in our business no matter what influences or pressures we individually, or collectively, come under that could comprise this principle. If we fail to fulfil this principle we will not have a sustainable business in the long term.
- People in The Linde Group **must** also show the same regard for the health, safety and care for the environment within the communities in which we operate as we do for our own employees and within our own working environments.

Personal ownership for HSE through visible, demonstrated leadership and accountability at all levels throughout The Linde Group

- The Executive Board establishes the importance of HSE to the organisation through the HSE policy and visibly commits support and leadership for the HSE policy and programmes.
- To achieve our HSE vision this commitment and leadership **must** exist at all levels of the organisation by people demonstrating the correct behaviours at all times.
- Visible Leadership will also be demonstrated by showing concern for others' health and safety so that they avoid harm, taking time to discuss and understand HSE issues with colleagues, positively reinforcing the right behaviours and requiring people to take accountability for doing things to improve HSE performance.
- The Linde Golden Rules of Safety (Golden Rule No. 1: We will consistently demonstrate personal ownership and accountability for safety through our actions and behaviours) specifically addresses personal ownership for safety and further defines what it means for us all (see *IMS-01-03 : The Linde Group Golden Rules of Safety*)
- We (every person working for The Linde Group) will all take personal ownership and accountability for HSE. This means:
 - We will think before we act to ensure we do not take unacceptable risks.
 - We will do what we know to be right and safe so we do not endanger our own or our colleagues' health or safety, or indeed that of others who may be affected by our business, or cause unnecessary harm to the environment.
 - We will make sure that we have been adequately trained before starting any task.
 - We will follow rules and procedures. By doing this we are also seen by others to be demonstrating safe behaviours and therefore will set a good example to others.
 - We will address unsafe practices and conditions by taking direct and immediate action ourselves. If we cannot do this we will report them, so that they can be rectified before someone gets harmed.

HSE principles shall be reflected in 100% of our behaviour, 100% of the time

- The Linde Group HSE vision will be achieved by all of us making HSE 100% of our behaviour, 100% of the time.
- We expect all people to behave and conduct themselves in a manner that demonstrates the highest priority for HSE all of the time, in every task we perform, in every activity we take part in, in every investment or recruitment decision, in every meeting, journey and site visit, etc.
- By doing this, HSE considerations will become an integral and automatic part of everything we do at work, whilst travelling and outside work.
- We should use the policy and principles to challenge our decisions and actions, and to guide our day-to-day work.

Our Vision Objectives

Zero incidents

- We **must** fundamentally believe that all fatalities, injuries or other incidents, such as damage to property or unsafe acts or conditions, can be prevented, and we **must** be committed to a goal of zero incidents.
- We will not accept that fatalities, injuries or other incidents are inevitable, or tolerate unsafe acts and conditions that can lead to incidents.
- We will report and learn from incidents and observations of unsafe acts and conditions to eliminate risks, wherever possible, and then adequately control any residual risks.

Safe, secure and healthy working conditions for all who work with and for us

- All people that work with and for us **must** be able to conduct their duties in conditions and in a way that is as safe as possible, and without unacceptable risk to their health and safety. This includes our own employees, our contractors and personnel from other organisations that are working with us.
- Our commitment to a safe, secure and healthy environment should also extend to our staff when working away from their normal place of work, including when travelling and when visiting other business locations.
- "Safe" working conditions is about managing the risks that could cause acute harm (injury) to people, whereas "healthy" working conditions relates to the risks that could cause chronic harm (illness or injury) to people. "Secure" working conditions is concerned with protecting our people and assets from criminal and terrorist activity (both internally and externally).
- All managers **must** ensure that risk assessments are carried out to identify all unsafe or unhealthy working conditions and that appropriate preventative measures are implemented.
- We will provide adequate facilities and suitable arrangements to manage hygiene and welfare issues at all our locations.

High quality, safe and environmentally responsible products and services that meet or exceed customer expectations

- By supplying high quality, safe and environmentally responsible products and services we ensure that our clients, customers and the communities in which they operate are not exposed to unnecessary risks.
- We conduct risk assessments on our products and services to identify potential risks and suitable methods of controlling them.
- We provide our clients and customers with supporting information and advice about our products and services so that they can perform adequate risk assessments on their activities and undertake the necessary controls to reduce their risks.
- "High quality" means that we will provide our clients and customers with products and services that meet or exceed their expectations, and that we are committed to continuously improve our quality performance. This can include other requirements, in addition to those general quality aspects such as on time, on specification etc., for example, FDA requirements, Medical Controls etc., and can be customer or market sector specific.
- "Environmentally responsible products and services" means that we consider and minimise the environmental impacts of our products and services (e.g. climate change impact, water/air/land impacts, etc.) and provide our customers with information and product/service options in order to support customers' environmental performance.

Responsible use of natural resources

- Many of our processes use natural resources as raw materials and generate waste streams. We will therefore ensure that we use energy, water and natural resources efficiently so that we minimise the impact we have on the environment. If we manage this effectively, as well as reducing harm to the environment, we should also improve our operational efficiency.
- Responsible use of resources means that not only will we work to use resources efficiently to minimise our environmental impact, but that we will also support and influence our supply chain, clients and customers to assist them in making sure that the resources they use, including our products, are used responsibly and efficiently.
- Where necessary we may wish to work with suppliers to ensure that they manage and control any risks associated with the materials with which they supply us.

Economic and environmental sustainability in everything we do

- Supporting the good reputation of our clients and customers, and how they use our products and services, is essential to building long term business relationships with them. In this way, we contribute to the long term economic, environmental and social sustainability of our organisation.
- We **must** be committed to avoiding harm to the people who live in the communities in which we operate and for whom we may provide products to. Building trust and maintaining good relations with the community will play a part in helping us build a sustainable business for the future.
- Research, development and promotion of technologies, products and services that are sustainable with regard to HSE include those which use less energy, fewer limited resources, do not deplete natural resources, do not directly or indirectly pollute the environment, can be reused or recycled at the end of their useful life and can be used without impact on health and safety throughout their full economic lifecycle.
- When we develop new technologies, products or services, we **must** take into account current and future requirements and risks, so that they can be used by our customers safely and environmentally responsibly both now and in the future.
- We influence our supply chain to make sure that resources are supplied ethically and used responsibly.

Our Commitment

We will:

Comply with all applicable legal, regulatory, industry and corporate requirements

- We are required by local, regional and international laws to comply with all regulations relevant to our operations and activities. We may also be required to meet additional HSE requirements specified by our customers.
- Compliance with these requirements is a minimum and we use systems to check, audit and verify compliance on a regular basis.
- In The Linde Group we comply with all legal requirements. In addition, we develop our own corporate standards and procedures which we **must** also comply with at all times. These will be based on our previous incidents, risk assessments, research and development and experiences. If there is a difference between the applicable legal and Linde internal corporate requirements then Linde **must** always comply with the higher standard.
- Industry guidance and codes of practice (e.g. EIGA, CGA etc.) are always considered and will be integrated into our HSE management system, or addressed in some other way. We will involve ourselves in the development of industry standards and requirements.
- To achieve compliance we ensure our people are competent in the requirements that apply to them and fully understand their relevance.

Design, construct and operate our facilities in a safe, secure, efficient and environmentally responsible way

- Our facilities (e.g. plants, sites) and other equipment (e.g. CES installations, distribution equipment such as trucks and trailers) **must** be well designed and constructed, well maintained and operated. This will result in operations that are highly productive, operationally and environmentally efficient and reliable.
- This will also contribute to a business that is very safe to work in for our employees, contractors and business partners.
- To achieve this commitment we **must** implement and consistently apply operational and HSE processes and procedures (e.g. Major Hazards Review Programme and Process Safety Management, Risk Assessment, Auditing, Permit To Work, Engineering Management of Change, Emergency Preparedness, Health & Hygiene programmes, etc.)
- To be environmentally responsible means that we **must** prevent pollution to the environment, which can take many forms and can harm the environment in different ways. Responsibility **must** include:
 - Understanding the risks of pollution from our processes and activities, so we can put plans in place to mitigate and control any such environment impacts
 - Focus on reducing emissions and on optimising our processes to improve efficiency of resource uses, materials and energy
 - Eliminating uncontrolled chemical releases, such as spillages, and minimising disposal of materials and increasing recycling, and thereby effectively reducing harm to the environment

Personal accountability to continuously improve our HSE performance through tracking against our goals and targets

- By measuring, reviewing and reporting on our HSE performance, we can ensure that our people and other stakeholders know how well we are performing and in which areas we need to improve. They will understand why we focus on key HSE activities and set ourselves targets for improvement. We can identify gaps and deficiencies and take actions to correct them.
- Accountability is demonstrated at the Corporate level by ensuring that key HSE objectives and targets are set by the Executive Board and regularly reported both internally and externally, for example, published in the Annual Report/Corporate Responsibility Reports (e.g. Lost Time Injury Rate, energy and water consumption, emissions, etc.).
- Personal accountability is demonstrated by the development of, and tracking of, HSE objectives in business plans and personal objectives. These HSE objectives and targets are both lagging and leading in their nature, with an increasing emphasis on more leading proactive measures.

Proactive management of risk in our business

- In order to become truly leading in HSE, action plans and improvement programmes **must** be the cornerstones for improving our HSE performance.
- Plans for all of our businesses will be set and reviewed annually. They should consider our policy objectives and The Linde Group HSE strategy so that they address the key risks.
- We will introduce processes and measures to help us to continuously improve our performance as a business, in our teams and as individuals. For example, identification and sharing of global best practices.
- We will actively identify, eliminate or minimise potential sources of harm or risk arising from all our activities:
 - We **must not** allow unsafe acts or conditions to arise, or wait for an incident to occur before we address potential sources of harm or risk, we **must** all continually look for ways to identify, eliminate or minimise them.
 - We develop and use tools for assessing and mitigating risk. These include behavioural observations, audits, risk assessments, management of change processes, HAZOPs, permits to work (PTW), etc.
 - Appropriate risk assessment methods **must** be applied prior to performing any task, activity, project, change, etc. and **must** remain updated and actively communicated to those at risk.
 - By applying these methods, we can identify and prioritise the risks and determine ways to eliminate or reduce each risk to at least an acceptable level, so far as is reasonably practicable.

Work with our business partners and our relevant industries to actively promote and enforce compliance with this policy

- In order to manage our business effectively, we use contractors and other business partners to contribute to our business. They can have a potentially major impact on our HSE performance and reputation and so we require them to work in line with our HSE policy.
- In a truly leading HSE organisation, which adopts an interdependent culture, all employees **must** care for the safety and health of contractors and partners that work with us.
- By business partner we mean people and organisations that we have some form of business relationship with, such as a formal supply contract, commercial arrangement etc. This would typically include contractors, suppliers, customers, and commercial partners such as Joint Ventures companies.
- We will influence our business partners to get them to understand and share our values, in particular our need to make HSE a pre-requisite to doing business. This support and cooperation is essential to the health and safety of our employees, as well as their own.
- We **must** require them to align their behaviours and systems with our own. If they do not, and do not demonstrate a willingness to adapt and comply, then we should make sure they understand the consequences, which may lead to a failure to pre-qualify or to be selected, or may result in a termination of a contract or agreement.
- As with our contractors, our customers, clients and suppliers should also want to operate safely and care for the environment, but will have their own duties and aspirations for HSE. If the standards of our customers, clients and suppliers in the area of HSE do not meet those we expect, and we are unable to bring about change through influence and education, then we may not continue to work with them. We will accept that there may be some short term adverse consequences to our business, but that over time this will differentiate us from other organisations.

Promote open communication and learning with all stakeholders and sharing of HSE knowledge

- Sharing HSE knowledge is about communicating experiences and solutions to improve our understanding so that we can prevent recurrence of incidents, employ better practices and ensure that our people are capable and competent to undertake their jobs.
- Communication of key issues and how we manage and mitigate risks is important to us as a business but also to our stakeholders. Our communication should be open and honest and meet the needs of our stakeholder groups.
- We are open to dialogue with our stakeholders about our safety, health and environment issues so that we can gain knowledge of their concerns and viewpoints, take on board any issues and to make our business needs and decision making transparent to them.
- In The Linde Group we recognise that the more effective we are at sharing our knowledge and experience and learning from audits, incidents, etc. the faster we will collectively move towards our vision.
- We will exchange and share HSE knowledge with customers, contractors, clients and the communities in which we operate. We will also participate actively in industry forums and associations such EIGA, CGA, etc. and encourage benchmarking (e.g. performance, systems, tools and technologies etc.) with our industry peers and leaders.

Provide resources, training, equipment and other support to enable fulfilment of this policy

- Adequate resources, training, equipment and support are the foundation from which people understand what they need to do so that they and their colleagues can be safe at work, know how to protect and care for the environment in which they work and meet our business and customer needs.
- We will ensure that all our employees have the skills and training necessary for them to carry out their duties safely and that we have the resources to train people effectively.
- All employees, contractors and business partners that work with us shall have access to any training, information or equipment that is necessary to enable them to implement and support this policy.

Document Information

About this Document

Version	Date	Author	Quality Reviewer	Approver
3.0	February 2015	Russell Day	Christoph Herrmann	Phil Graham
2.0	August 2012	Russell Day	Christoph Herrmann	Phil Graham
1.2	November 2008	Russell Day	Lennart Fredriksson	Phil Graham
1.1	April 2008	Russell Day	Lennart Fredriksson	Phil Graham
1.0	January 2007	SHEQ Merger Integration Team - SHEQ Policy Sub-GROUP	SHEQ Merger Integration Team	Linde Group Executive Management Board

Change History

Version	Description of Change
3.0	Complete review to align with the current HSE Policy.
2.0	Complete review to align with the current SHEQ Policy.
1.2	"Maintenance and review of SHEQ Policy" added to the Purpose, Scope and Target Audience topic.
1.1	The following topic updated: <ul style="list-style-type: none"> Updated version (1.1. February 2008) of The Linde Group SHEQ Policy added (policy signatories revised)
1.0	Initial release of The Linde Group SHEQ Policy.

Learning and Assessment Guide

VVP-02-01-GROUP : The Linde Group Health, Safety and Environment (HSE) Policy

Prerequisites

Nil

As a result of training in the content of this document you will be able to:	Learning method:	Assessment method:	Reference:
Understand The Linde Group SHEQ policy and its implications for you.	Self study	Multi-choice test	This document
Assessment Complete	Sign		Date
Learner:			
Assessor:			