



2023
Modern
Slavery
Statement

ELGAS

 **BOC**
A Linde company

SPW


Message from the Managing Director, South Pacific

I am pleased to present our fourth Modern Slavery Statement which details our activities and progress in 2023. As a leading industrial gas and energy provider we take our impacts seriously and BOC, ELGAS and SPW, each subsidiaries of Linde, have continued to review modern slavery risks locally and abroad.

We are committed to achieving our goals ethically and improving the communities where our people live and work. Integrity remains a core value and we will continue to increase our organisation's awareness about a range of sustainability issues including the risks of modern slavery.

During this reporting period, we upgraded our training platform and relaunched our modern slavery training. The training now forms a part of our onboarding of new employees and contractors and the majority of our people have completed the course. I am proud of how our training enables our people to understand the gravity of modern slavery and empowers them to identify and report any suspicious activities.

Modern slavery risk management initiatives remained a priority this year as we continued to build a deeper understanding of our supply chain through new risk management tools to provide actionable insights into our modern slavery risks.

We are proud to be part of Linde, a company that works hard to exceed the expectations of customers, employees, shareholders, suppliers and communities across the globe.

In April 2023 Linde was recognised as one of the [2023 World's Most Ethical Companies](#) by Ethisphere, its third consecutive year of inclusion on the list.

As we look ahead, BOC, ELGAS and SPW remain committed to reviewing and improving our Modern Slavery Act compliance mechanisms and identifying opportunities to continue reducing Modern Slavery risks across our business in the South Pacific.



Binod Patwari - Managing Director, Region South Pacific



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Section one:

Background and process of consultation with subsidiaries



2023 Modern Slavery Statement

BOC Limited ACN 000 029 729 (“BOC”) is a subsidiary of Linde plc. BOC, along with its subsidiaries, ELGAS Limited ACN 002 749 260 (“ELGAS”) and South Pacific Welding Group Pty Ltd ACN 078 830 878 (“SPW”), supplies compressed and liquefied gases, chemicals and related equipment and services across the South Pacific region including Australia, New Zealand, Papua New Guinea and the Solomon Islands. Collectively they are referred to as Linde South Pacific in this report.

This statement has been prepared in accordance with the Modern Slavery Act 2018 (Cth) (“Modern Slavery Act”) and covers the reporting period 1 January 2023 to 31 December 2023.

This joint Modern Slavery Statement is submitted by BOC on behalf of all reporting entities in the BOC group, namely BOC, ELGAS and SPW, and in accordance with section 14 of the Modern Slavery Act.

The Modern Slavery Act (the Act) aims to combat modern slavery in global supply chains. The United Nations and the Walk Free Foundation estimate there are approximately 40 million victims of modern slavery around the world.

Source: Commonwealth Home Affairs Guidance for Reporting Entities.



Consultation process

The consultation process for our statements each year is managed by BOC, involving respective leaders from BOC, ELGAS and SPW across the South Pacific region. A Modern Slavery project management team developed this statement, and regular meetings and information gathering sessions were held involving personnel who work closely with BOC, ELGAS and SPW from both an operational and supply chain perspective. The project management team has worked closely with subsidiary business leaders and divisional managers to identify existing and emerging risks, outline action timelines and track progress.

This statement has been reviewed and endorsed by the Linde South Pacific Compliance Review Board in June 2024 in accordance with section 14(2)(d)(ii) of the Modern Slavery Act. The Linde South Pacific Compliance Review Board is the principle governing body of Linde South Pacific for the purpose of compliance matters including Modern Slavery. The Compliance Review Board comprises all of the directors of the corporate board of BOC, the parent company of the Linde South Pacific group of companies, plus all additional directors of subsidiaries of BOC, plus the Linde South Pacific Heads of HR, IT and Legal.



Background

Linde South Pacific is committed to regularly reporting on actions taken to identify and address the risks of Modern Slavery in our business and operations across the South Pacific region, as well as our global supply chain network.

As a subsidiary of Linde, we support the protection and promotion of human rights worldwide. We do not tolerate nor engage in discrimination, harassment, violations of privacy, slavery or servitude, restrictions on free assembly or unfair work practices.

Our organisation expects that every person and organisation that we conduct business with observes the standards outlined in the Linde Code of Business Integrity and Code of Conduct for Linde Suppliers.

We recognise the importance of large organisations operating in Australia and the South Pacific region taking a leadership role in combating Modern Slavery risks, including:

- Human trafficking
- Slavery
- Servitude
- Forced labour
- Debt bondage
- Forced marriage, and
- Child labour

Linde South Pacific is actively working with employees, suppliers and other stakeholders to increase training and awareness of the risks of Modern Slavery, and to communicate our organisation's expectations and policies.



Section two:

The reporting entities' structure, operations and supply chains



Linde South Pacific overview

Linde South Pacific is comprised of BOC, ELGAS and SPW who are subsidiaries of Linde.

Linde

Linde is a leading industrial gases and engineering company employing 65,000 people globally and serving customers in more than 100 countries worldwide. Linde's major shareholders can be found [here](#).

BOC

BOC supplies industrial and medical compressed and liquefied gases, chemicals and related equipment across the South Pacific region.

ELGAS

ELGAS is a leading supplier of liquefied petroleum gas (LPG) for homes, businesses, vehicles and barbecues in Australia and New Zealand. The organisation operates Australia's largest LPG storage facility in Port Botany and has over 50 service centres.

SPW Group

SPW Group operates a national welding supply chain through six specialist welding branches that provide equipment, consumables, service, and equipment hire.



Operations, production and distribution

We continue to recognise that the nature of the operational activities in which we engage subjects Linde South Pacific, our employees and, to some degree, our customers to legislative and industry requirements.

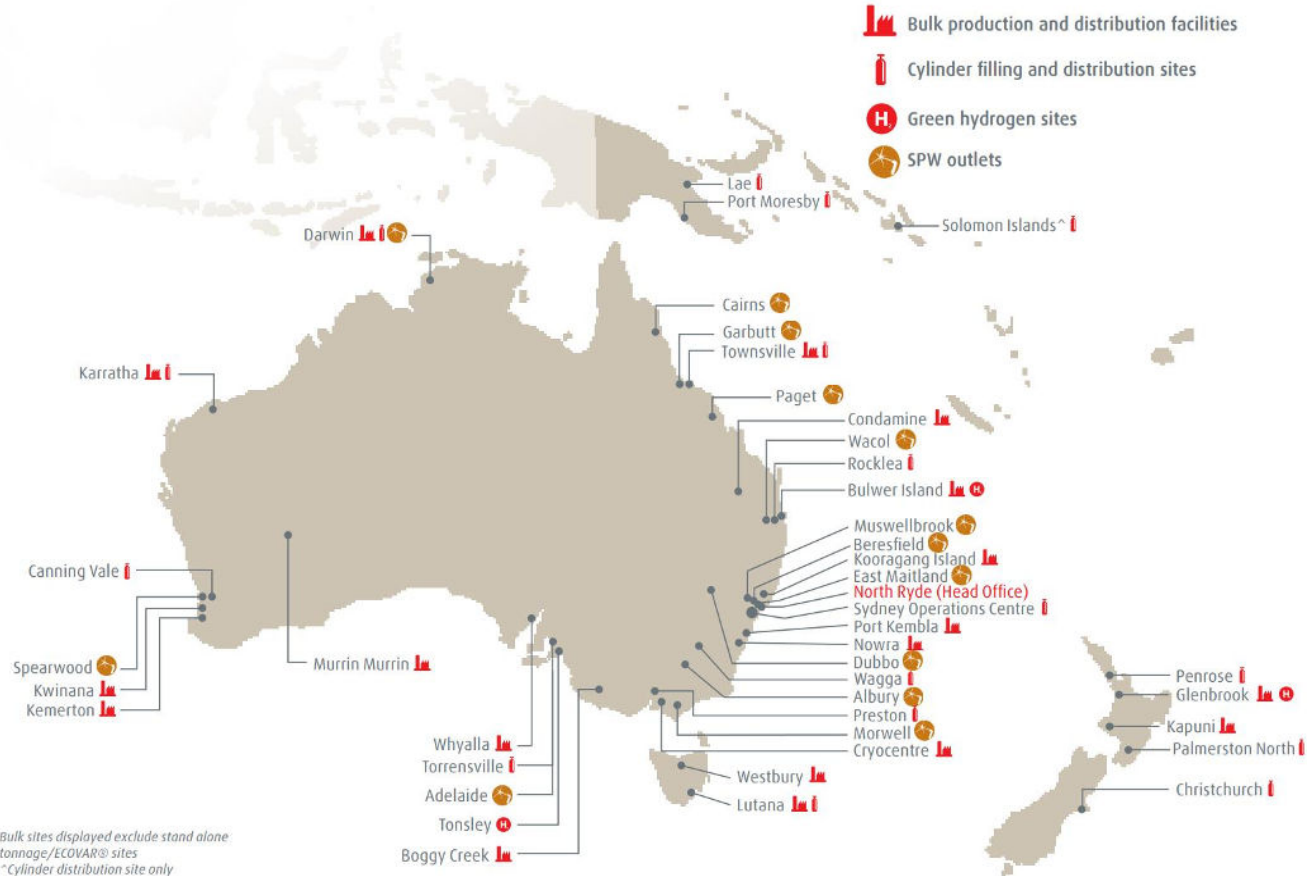
It is our policy to mandate that all employees and contractors perform their duties within full compliance of both the letter and spirit of the law, and also within all nominated standards and codes of practice relating to our industry.

We therefore provide adequate resources and systems are provided within Linde South Pacific to monitor, evaluate, implement, and verify that compliance is being maintained.



BOC and SPW operations, production and distribution

This graphic demonstrates BOC and SPW's production and distribution networks in the South Pacific region.



As at 2023. This map does not include 75+ BOC Gas & Gear locations. Image is for illustrative purposes only.

Bulk sites displayed exclude stand alone tonnage/ECOVAR® sites
 ^Cylinder distribution site only

ELGAS operations, production and distribution

Similarly, ELGAS also operates a large production and distribution network across Australia and New Zealand as shown here.

- ◆ LPG Export/Marine Terminal
- ||| Cylinder Bottling Plant
- ⌘ Underground Storage Facility

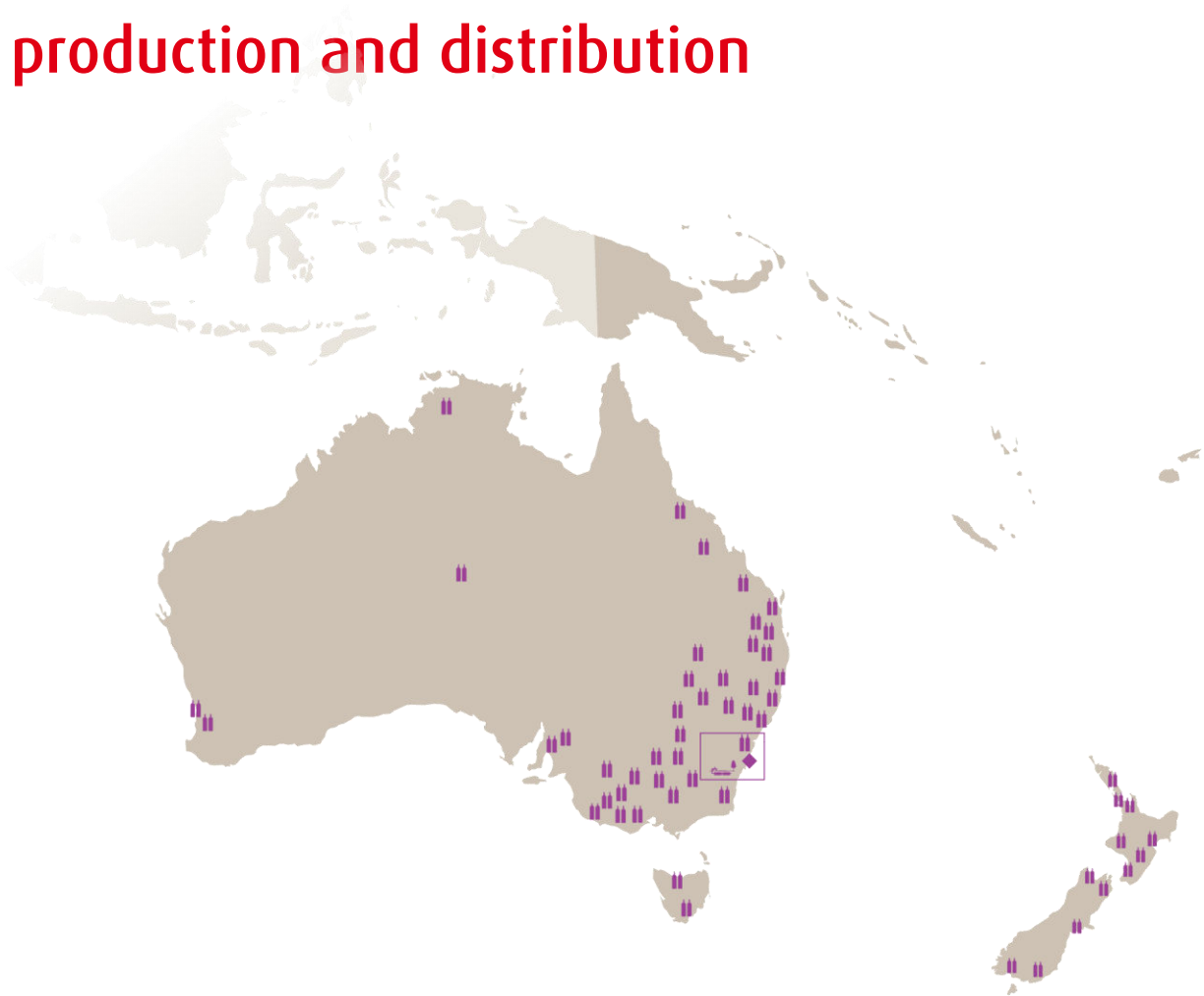
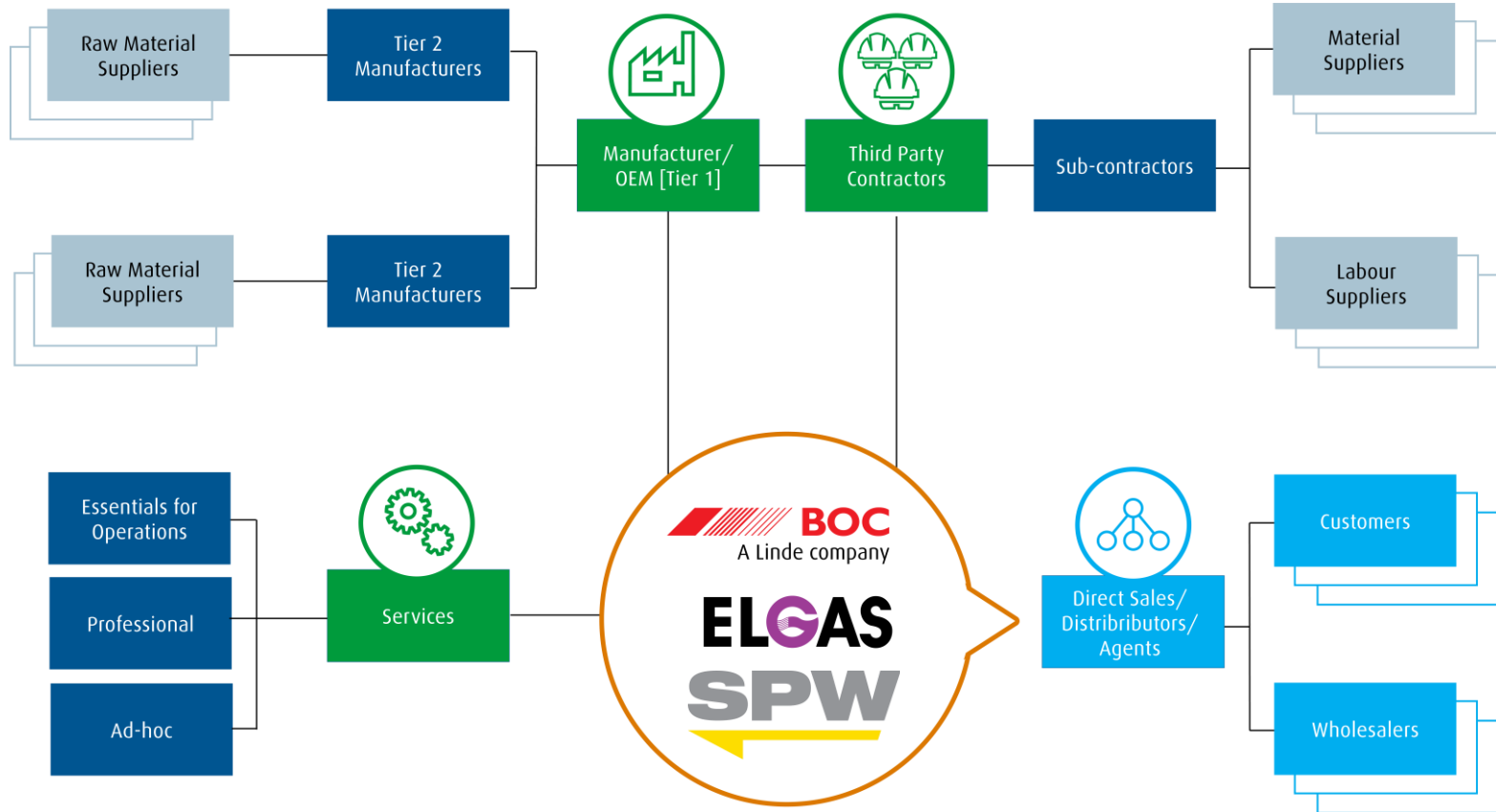
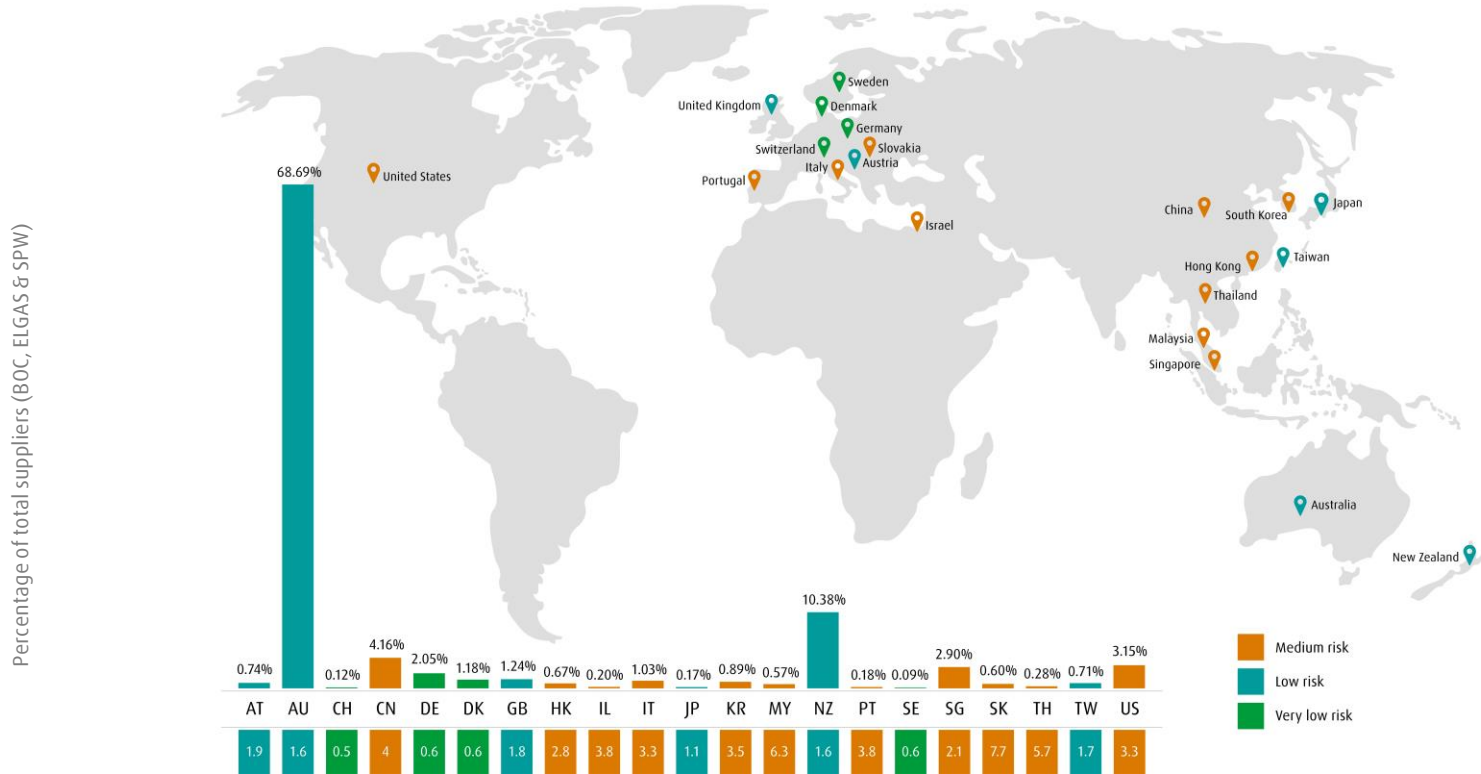


Image is for illustrative purposes only

Supply chains



Approximate distribution of suppliers* by countries with potential risks of Modern Slavery



* Suppliers with annual spend >0.5m \$USD

^Source: Walk Free Foundation, Global Slavery Index, 2022

Commercial goods

The majority of BOC's gases are produced or sourced locally in Australia and New Zealand, however some specialty gases are sourced internationally through the Linde network or through accredited scientific laboratories. High volumes of industrial gases may be sourced from other Linde entities within the Asia Pacific region if local supply is unable to meet demand.

Other commercial goods sold or used through the BOC network include welding and cutting equipment (machines, wire), gas storage vessels (cylinders, tanks, trolleys), medical products (oxygen concentrators, CPAP machines, sleep therapy devices) and personal protective equipment (headwear, respirators, gloves, ear plugs, boots).

With quality and safety as our top priority, BOC sources commercial goods from world-leading third-party manufacturers that share our commitment to ethical business conduct.

BOC also provides engineering services and on-site equipment to large customers across Australia and New Zealand which may require specialised parts or technology to be sourced internationally. This can range from analysers and purifiers, to clean dry air systems and nitrogen generators.

Operational goods

BOC also sources hardware, software, parts and hard goods to upgrade and maintain property, plant and equipment at production sites across the South Pacific region. These products are sourced from around the world (refer to diagram on page 14 for an amalgamation of all group suppliers).

We reserve the right to require an independent audit be undertaken to verify our Suppliers' compliance with the Linde Supplier Code of Conduct.

ELGAS

ELGAS is Australia and New Zealand's largest marketer of LPG with over 50 service centres across Australia and New Zealand ensuring local, safe and reliable supply across both countries. ELGAS provides LPG for home, business, automotive and BBQ customers. ELGAS operates Australia's largest LPG storage facility 'The Cavern' at Port Botany. ELGAS sources its LPG locally and globally as it does with equipment including valves, cylinders and other parts*.

ELGAS is dedicated to the safety of our customers, employees and the communities in which they live.

SPW Group

SPW supplies welding equipment, safety PPE, consumables, service and hire equipment, and solutions for most welding processes. With a national specialised welding supply chain, SPW is a major distributor of leading recognised welding and cutting brands, and imports quality products from many different locations worldwide*.

Shared services: Linde South Pacific

Linde has shared services and IT helpdesk teams that support Linde South Pacific's operations. These teams are based in Manila, India and Romania.

*refer to diagram on page 14 for an amalgamation of all group suppliers.

Linde South Pacific policies

Linde South Pacific abides by the principles of the International Bill of Human Rights, enacted by the United Nations. Policies and position statements for the Linde organisation are in place to support human rights and labour standards.

Linde Code of Business Integrity

The [Linde Code of Business Integrity](#) sets out how companies and employees within Linde are required to maintain their relationships with customers, suppliers, governments, other businesses, the environment and people.

It outlines Linde's position on human rights which commits Linde South Pacific to protect and promote human rights and builds upon the values and principles of safety, integrity, accountability, inclusion and community.

Linde Code of Conduct for Suppliers

Linde South Pacific also share these principles with our suppliers through the [Linde Code of Conduct for Suppliers](#) which informs our suppliers of the minimum requirements for health and safety, environmental protection, legal compliance and integrity, human rights and labour standards, including our intolerance of any form of forced labour.



Sustainable development

Linde's mission is one of making our world more productive through high-quality solutions, technologies and services that make our customers more successful and help to sustain and protect the planet.

Linde helps customers worldwide improve their environmental performance and reduce their carbon footprint and is committed to minimising our own environmental resource intensity, including for energy, water and waste. Performance is managed through a sustainable development management system with KPIs and targets that are applicable to global operations and our value chain.

Linde South Pacific upholds Linde's global standards internally and across our value chains. We maintain due diligence processes to reduce potential risks from compliance or environmental violations in prospective acquisitions and joint ventures. A member of Linde's Management Committee is the senior executive responsible for this area.

Linde works hard to exceed the expectations of customers, employees, shareholders, suppliers and communities in which we operate. Below are some of the awards and recognition that Linde earned during 2023:

- January: Awarded the Sustainable Market Initiative's Terra Carta Seal. The Terra Carta Seal recognizes global companies which are [driving innovation and demonstrating their commitment to creating sustainable markets](#). It is awarded to companies whose ambitions are aligned with those of the Terra Carta, a recovery plan for nature, people and the planet.
- April : Recognised as one of the 2023 World's Most Ethical Companies by Ethisphere, its [third consecutive year of inclusion](#) on the list.
- July: Included in the FTSE4Good Index for the [eighth consecutive year](#). The FTSE4Good Index Series is a tool for investors seeking to invest in companies that demonstrate strong sustainability practices.
- December: Announced [inclusion in the Dow Jones Sustainability World Index](#) (DJSI World) for the twenty-first consecutive year. Linde has also been included in the DJSI North America.

Linde's 2022 Sustainable Development Report (SDR) can be found [here](#). The 2023 SDR report is published in July 2024.

Section three:

Potential Modern Slavery risks and actions taken

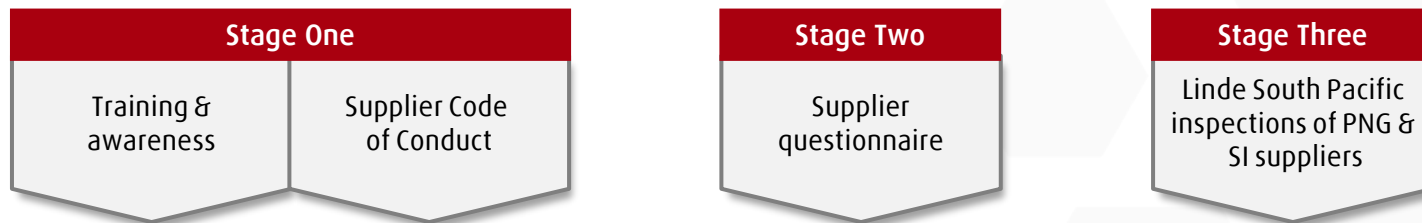


Linde South Pacific has considered our operations and supply chains to identify potential Modern Slavery risks and determine appropriate actions to address these risks. For its 2020 statement, Linde South Pacific conducted workshops with relevant areas of our businesses to build an understanding of Modern Slavery risks, identify potential risk areas including industries and geographies with a higher risk profile, and to build a priority action plan. Throughout 2021 and 2022, we continued to hold regular meetings with a targeted audience comprising stakeholders from key business areas to focus on the Modern Slavery strategy.

In this latest reporting period, we have focused on training and awareness as well as increasing checks and balances of our third party suppliers via the Ethixbase360 tool which supports us in meeting Modern Slavery legislative requirements. See more over the page.

Given Linde South Pacific's values, internal policies, and labour hire arrangements, there is a relatively low risk of Modern Slavery occurring in our internal operations. Linde South Pacific also self-produces the majority of the gas products it distributes. Potential risks are higher when dealing with third-party suppliers where Linde South Pacific does not have direct oversight or involvement in their upstream operations and supply chains. This is particularly the case where such suppliers are located overseas in countries where Modern Slavery, human rights and labour laws are not as robust as in Australia and New Zealand. Further detail on these matters is included on the following slides.

Our stage one actions focused on building awareness through communications and uplift in our strategic training. Having previously reviewed our suppliers and communicated our expectations to them via the Linde Code of Supplier Conduct we maintain regular contact with them. Stage two involved an ongoing deeper dive, with a more detailed Modern Slavery questionnaire being sent to the top 10 suppliers in each of our key procurement areas to attempt to better understand their operations and supply chains. We are still progressing Stage three. It involves further entrenching our training and awareness programs, and launching our own inspections of suppliers in Papua New Guinea and the Solomon Islands.

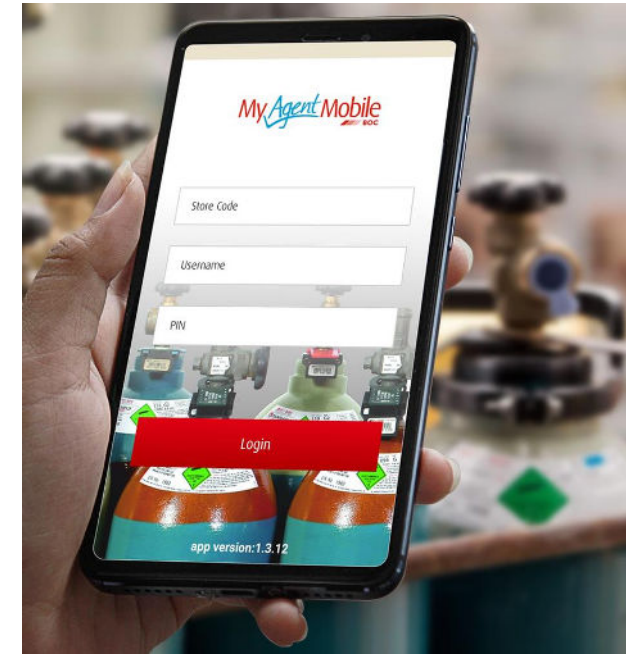
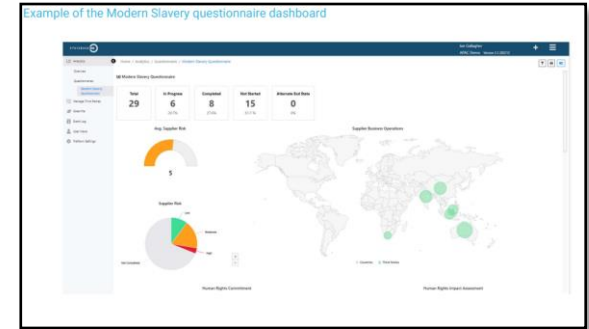


Ethixbase 360

Ethixbase360 supports our efforts to achieve supply chain transparency. We adopted and successfully introduced this risk management platform within the reporting period. With a dedicated focus on Economic Social and Governance checks, this tool enables and aligns our governance with the 10 principles of the United Nations Global Compact. It provides actionable insights into any risks we may face. The platform and proprietary due diligence methodology offer us a more sustainable approach to managing risks across our entire supply chain.

Within Ethixbase is a Modern Slavery Supply Chain Risk Assessment Questionnaire. Our businesses systematically target suppliers via the questionnaire tool which we introduced over the reporting period. More than 100 suppliers completed the survey in 2023. The online tool allows us to receive valuable modern slavery risk data via an easy to navigate dashboard.

We are committed to meeting our requirements and having a positive impact. We use tools designed as market-leading solutions which help to ensure we engage directly with third parties via the Third Party Risk Management platform.



Personnel across the South Pacific region

One of Linde South Pacific's most valuable assets is our reputation for uncompromising ethics. This has been and will continue to be the direct result of our conduct both on and off the job.

Linde South Pacific has engaged Navex Global to provide an independent Integrity Line and Portal which is accessible from our intranet and available to all employees and contractors.

Values

Linde South Pacific values are as follows:

Safety – We put safety first. We believe all incidents are preventable, and our goal is no harm to people, communities, or the environment. We continuously work to improve our safety culture and performance worldwide.

Integrity – We always strive to achieve our goals ethically, and with the highest integrity. We expect transparent and respectful interactions between management, employees, and our business partners, consistent with our Code of Business Integrity.

Community – We are committed to improving the communities where we live and work. Our charitable contributions, along with employee volunteerism, support initiatives that make important and sustainable contributions to our world.

Inclusion – We embrace diversity and inclusion in order to attract, develop and retain the best talent and build high-performance teams. By hearing all voices and benefiting from diverse opinions, thoughts, and perspectives, we achieve our full promise and potential.

Accountability – We hold ourselves accountable for our performance, individually and collectively. We focus both on what we accomplish and how we accomplish it, and we are committed to delivering on individual and company goals.



Employees in Australia and New Zealand

Linde South Pacific operates robust policies and procedures concerning employment, including screening individuals prior to hiring them (including work eligibility checks), providing clear employment conditions outlining fair pay and hours and appropriate workplace behaviour.

These policies and procedures apply across all employment types and are reviewed on a regular basis. All employees are expected to abide by the spirit and the strict requirements of the Code of Business Integrity and applicable policies and procedures. Information about our policies is readily accessible to our employees via training programs and our intranet. We believe that fairness, transparency and trust drive growth and prosperity for all parties involved – employees, customers, suppliers, markets – and the communities that encompass them all. Adhering to those qualities brings out the best in us, inspires the best in our business partners, reduces our exposure to legal risk, and helps build and sustain a positive corporate reputation. Not only is behaving ethically the right and legal thing to do, it is also good business. Employees can report any concerns they have about unlawful and unethical acts in the workplace through their region's dedicated Linde Integrity Line. We have also implemented a whistle-blower policy in Australia that outlines what individuals should do if they wish to make a disclosure in relation to corporate misconduct, and what protection is available to them.

Our employees' health and wellbeing are crucial to living a happy and productive life and contributing to the success of our organisation. When we aren't feeling our best, we can't live or work at our best. Mental and emotional health is an important part of our values. We engage Converge International to provide an independent and confidential employee assistance program to our employees and their immediate family members. The Employee Assistance Program and our Wellbeing Program are both regularly promoted to our employees.



Employees in Australia and New Zealand

Further to the mental health and wellbeing survey we ran in 2021, to measure key psychosocial factors in our workplace, we have continued to provide our people with the opportunity to have their say. We are proud to have uplifted our wellbeing activities around feedback we received from our Mental Wellbeing Working Group.

The group's key objectives continue to be to establish, promote and maintain the mental health and wellbeing of staff through our work practices and to break down any stigma relating to mental health. Our Mental Wellbeing Policy still assists in defining the company's commitment relating to mental health and wellbeing and highlighting our desired wellbeing values and principles. In this reporting period we continued to offer employees paid volunteering opportunities as well as wellness tools, resources and training to help build connections and enable capability.

These programs support the people across our businesses to maintain and build a continued sense of wellbeing and inclusion.

The South Pacific Mental Wellbeing Hub has continued to be a resource to assist employees to learn more about mental health and wellbeing, proactively take care of their mental health and enable them to obtain assistance if required. While we have continued to uplift the Hub by adding the Workplace Mental Health Plan we do continue to rely on a model developed by Heads Up, the Australian Government's workplace mental health initiative. This was created in conjunction with Beyond Blue and the Mentally Healthy Workplace Alliance.

We believe in improving the communities where we live and work, and that giving back is an important aspect of healthy mental and emotional wellbeing. Our South Pacific Corporate Social Responsibility program – Act for Change helps us enact the values we stand for; by making charitable contributions where our employees' donations are matched for specific causes such as disaster relief, and supporting initiatives that will make important and sustainable contributions to our world via our community, customer and corporate sponsorship programs.

Linde South Pacific is committed to maintaining a safe workplace that values equal opportunity and is free from discrimination, harassment, and victimisation. The expectation of such begins with our pre-boarding and continues through the onboarding process, Employees are all engaged in a series of learning and development activities designed to communicate and embed our culture and values and reinforce the ongoing importance of meeting behavioural expectations and effective risk management across all of our businesses.

Labour Hire in Australia and New Zealand

We use a service provider resourcing model to manage our contingent workforce in Australia and New Zealand.

The above policies and procedures also apply across our contingent workforce, and our labour hire providers assure us that their employees are paid according to minimum wage agreements or relevant enterprise bargaining agreements.

Our labour hire providers also commit to ensuring their employees are trained and aware of their obligations to abide by the Modern Slavery Act. All other requirements, obligations and expectations of Linde South Pacific's suppliers which are set out elsewhere in this statement equally apply to our labour hire providers.

Employees in Papua New Guinea and Solomon Islands

In Papua New Guinea and the Solomon Islands we're actively reducing our potential sources of risk. During 2020 we introduced a personnel identity checking program. We also educated our employees in our Code of Business Integrity. We will continue to support our local populations to truly embed the policies identified above.

During 2022, we ran face to face Modern Slavery training sessions for our employees in Papua New Guinea and the Solomon Islands, which covered the same topics and materials as the training mentioned in this report.



Linde South Pacific training and awareness

After our initial launch of Modern Slavery Training in 2020, we identified areas for enhancement. In 2023, we developed and rolled out an updated and refreshed training module for Linde South Pacific employees and labour hire staff.

This Initiative aims to further raise awareness and strengthen our collective efforts in combatting modern slavery. The package covers:

1. Modern Slavery reporting obligations;
2. An overview of the Modern Slavery Act;
3. Forms of Modern Slavery and potential risk areas, including in operations and supply chains;
4. Global statistics and figures;
5. A refresher on Linde's policies and guidelines on Human Rights, Labour Standards, Code of Business Integrity and Supplier Code of Conduct;
6. Modern Slavery case studies and examples; and
7. An online test at the end of the training program to assess knowledge gained during the training.

Modern slavery training is now integrated into our new employee onboarding process. We firmly believe that raising awareness about modern slavery is essential for employees. It not only helps them grasp the seriousness of the issue but also empowers them to spot and report any suspicious activities. This baseline initiative is in line with our approach to ethical values and corporate responsibility, fostering a culture of social awareness and accountability throughout our organisation.

Our Line Managers are provided with a Guide to Human Rights to support their teams.

Suppliers

In 2020, the Linde Supplier Code of Conduct was updated and revamped globally, following which a local review was undertaken to ensure that the Code of Conduct captured local Modern Slavery concepts and obligations under the Modern Slavery Act 2018 (Cth).

Following that review, the Linde Supplier Code of Conduct was emailed to suppliers together with a reminder of Linde South Pacific's expectation that our suppliers continue to promote ethical sourcing best practice in their own operations and supply chains and a requirement that our suppliers:

1. Assess risks of Modern Slavery in their operations and supply chains and take action to reduce and control those risks;
2. Comply with all applicable Modern Slavery Legislation (including the Modern Slavery Act 2018 (Cth), the Modern Slavery Act 2018 (NSW), and any other relevant Modern Slavery legislation in other jurisdictions);
3. Provide all information that Linde South Pacific requires to enable Linde to prepare a public statement and report as required under Modern Slavery Legislation;
4. Notify us promptly upon becoming aware of any incident, complaint or allegation that it, or any entity in its supply chain, has engaged in Modern Slavery;
5. Take practical and effective steps to address any occurrence or material risk of Modern Slavery following any incident, complaint or allegation that it, or any entity in its supply chain, has engaged in Modern Slavery;
6. Audit their own operations and supply chains in high-risk areas; and
7. Ensure that their own suppliers and subcontractors comply with the Supplier Code of Conduct and provide us with proof of such compliance and undertaking if requested.

Up to this statement and since 2020, we prepared a Supplier Questionnaire which was issued to the top 10 suppliers in each of our key procurement areas to enable us to better understand their operations and supply chains. Up to 2023 we have maintained and regulated our 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, Supplier Code of Conduct and Human Rights Policy. In 2023, the Supplier Code of Conduct was further updated and redistributed to represent a far more comprehensive statement of Linde's values, including in relation to human rights, labour standards and supply chain compliance.

Section four:

Assessing the effectiveness of actions taken



Linde South Pacific is committed to an ongoing review of our operations and supply chains to identify potential Modern Slavery risks and determine appropriate actions to address these risks.

Operations: Training and awareness

The evaluation of our Modern Slavery training implemented in 2020, progressed through to 2023. We will continue to promote this training to our employees and measure its effectiveness in building awareness of our modern slavery risks.

Suppliers

Moving forward Linde South Pacific is committed to leverage our Ethixbase360 risk-based assessment tool to continue to help manage possible risks with our suppliers in our key procurement areas. Supplier responses to our Modern Slavery questionnaire have been continually assessed as they are received from high risk suppliers, and our teams continue to investigate and research our supply chains to better understand the supply chain back to the raw materials.



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