BOC

Modern Slavery Statement 2025

From our President and Managing Director

Linde South Pacific, incorporating BOC, ELGAS and SPW, reaffirms its commitment to conducting business ethically and responsibly, and to contributing positively to the communities in which we operate across Australia, New Zealand and the Pacific Islands.

As part of the global Linde Group, we have zero tolerance for all forms of modern slavery, including forced labour, practices akin to slavery, servitude, human trafficking, and any form of exploitation or oppression that undermines human dignity.

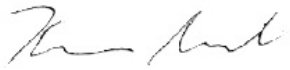
As a leading provider of industrial gases, energy and welding supplies across the South Pacific region, we acknowledge that modern slavery risks are real and have the potential to arise within our supply chains due to their scale, complexity and geographic reach.

During 2025, we continued to strengthen our approach to identifying, assessing and managing these risks. Building on progress made in previous reporting periods, a key area of focus was further embedding training and awareness initiatives across the business. These programs are designed to equip and empower our people to recognise potential indicators of modern slavery and to raise concerns with confidence.

We also expanded our engagement with suppliers, including an ongoing program conducting on-the-ground inspections in Papua New Guinea and the Solomon Islands. These inspections form part of an evolving program aimed at enhancing supplier transparency and supporting improved labour practices over time.

We continued targeted supplier due diligence through the use of questionnaires administered by a specialised third-party provider. This activity prioritised higher-spend suppliers and those assessed as presenting elevated risk. In addition, we undertook targeted reviews of cleaning and security services suppliers. As a result, we consolidated these suppliers and improved visibility of workforce arrangements through a single supplier relationship.

These initiatives represent important investments and a considered approach in our due diligence capabilities. Looking ahead, Linde South Pacific remains committed to continuously improving how we prevent, mitigate and address modern slavery risks, and to reducing the potential harm such risks pose to individuals and communities connected to our business.



Theo Martin
President and Managing Director, Linde PLC South Pacific

2025 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 2025 to 31 December 2025.

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.

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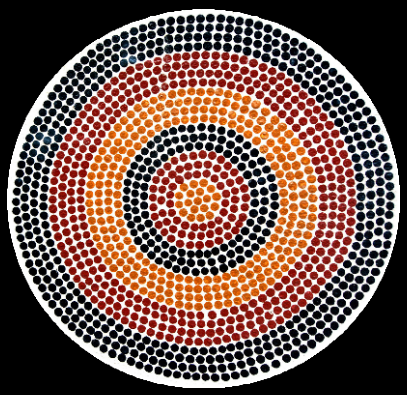


In the spirit of reconciliation, BOC acknowledges Aboriginal and Torres Strait Islander peoples as the Traditional Custodians of Country throughout Australia. We recognise the continuing connection to land, sea and community and we pay respect to their cultures, and to Elders past, present and emerging.

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 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 Board of BOC Limited (Australia) in June 2026 in accordance with section 14(2)(d)(ii) of the Modern Slavery Act. The BOC Board is the principle governing body of Linde South Pacific.

Our position

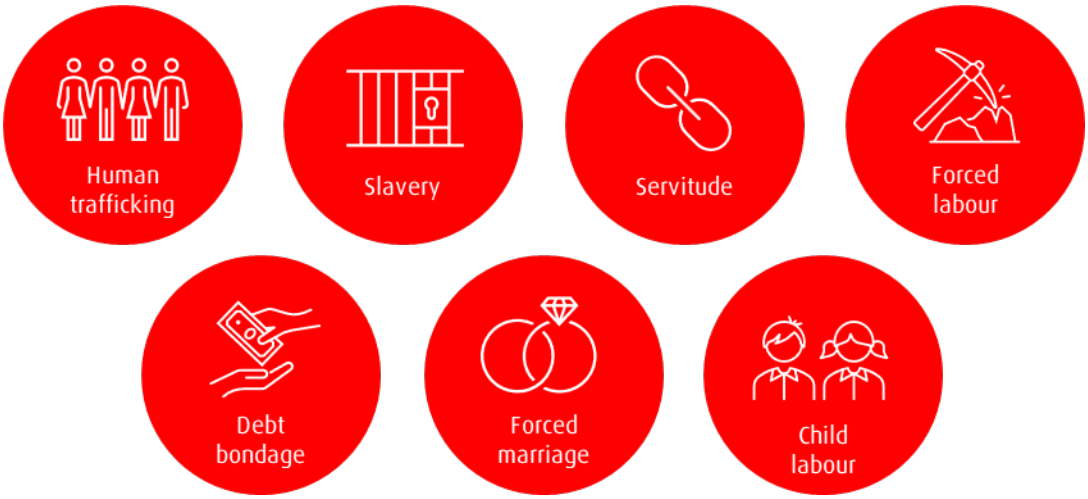
Linde South Pacific, comprising BOC, ELGAS and SPW, remains committed to regularly reporting on actions taken to identify and address the risks of modern slavery in our business and operations across the South Pacific region, as well as our global supply chain network.

As a subsidiary of Linde, we support the protection and promotion of human rights worldwide. Although we operate in many countries, the nature of our business is substantially local, and the company recognises the importance of respecting and promoting human rights and labour standards.

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:



Linde South Pacific continues to actively work 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.

Linde South Pacific structure

Headquartered in North Ryde, NSW Linde South Pacific comprises BOC, ELGAS and SPW which are subsidiaries of Linde. We employ more than 1,900 people across the South Pacific region and operate plant facilities, depots and retail outlets.

Linde is a leading global industrial gases and engineering company. We live our mission of making our world more productive every day by providing high-quality solutions, technologies and services which are making our customers more successful and helping to sustain, decarbonise and protect our planet.

BOC supplies industrial and medical compressed and liquefied gases, chemicals and related equipment across the South Pacific region including Australia, New Zealand, Solomon Islands and Papua New Guinea.

ELGAS is a leading supplier of Liquid Petroleum Gas (LPG) for residential, commercial and light industrial customers in Australia and New Zealand. As Australia's largest LPG provider, ELGAS offers residential and commercial customers gas bottles, onsite LPG refills and a range of customised options for their specific needs.

SPW operates a national welding supply chain with more than 60 outlets (as of 2025) that provide equipment, consumables, service, and equipment hire.

Our operations

We continue to recognise that the nature of the operational activities we undertake 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.

To support and assure ongoing compliance, Linde South Pacific maintains appropriate resources, systems and processes to monitor, assess and implement these legal and industry requirements.

BOC operations

The majority of BOC's industrial gases are produced or sourced locally in Australia and New Zealand. 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 the top priority, BOC sources commercial goods from world-leading third-party manufacturers that share our commitment to ethical business conduct.

BOC 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.

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 Figure 1).

ELGAS operations

ELGAS is Australia and New Zealand's largest LPG supplier with more than 50 service centres across both countries ensuring local, safe and reliable supply. ELGAS sources its LPG locally and globally, so too its equipment including valves, cylinders and other parts (refer to Figure 1).

SPW operations

SPW supplies welding equipment, safety equipment, consumables, service and hire equipment, and solutions for most welding processes. SPW imports quality products from many different locations worldwide (refer to Figure 1).

Linde South Pacific shared services

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 Figure 1).

Approximate distribution of suppliers by countries with potential risks of Modern slavery

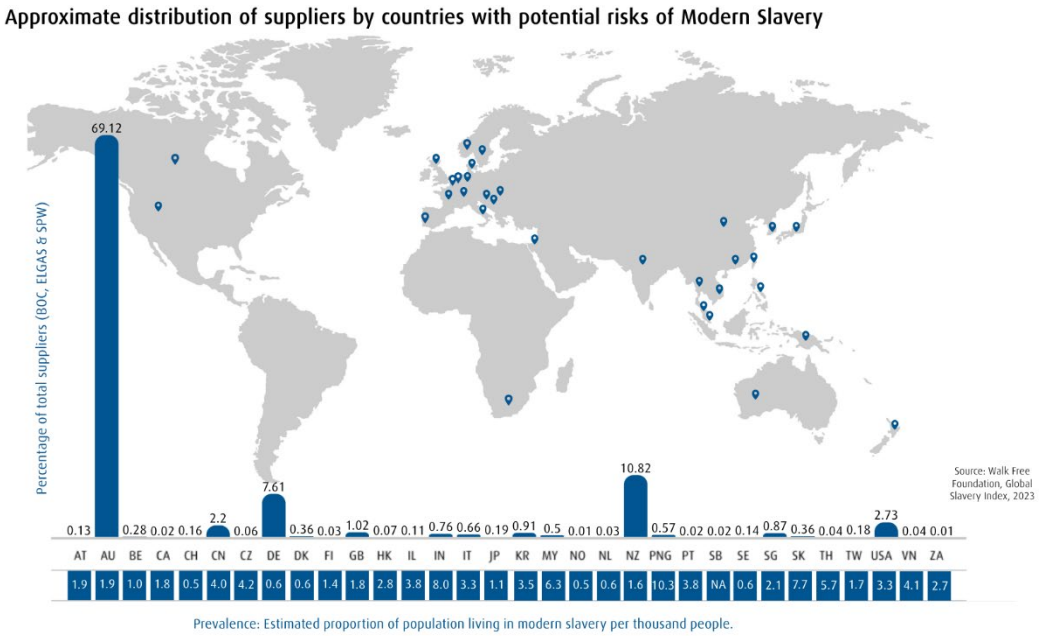


Figure 1 Amalgamation of all group suppliers

Linde South Pacific policies

Linde South Pacific continues to abide 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.

The Code outlines Linde's position on human rights which commits Linde South Pacific to protect and promote human rights and builds upon the values 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 human rights and labour standards, health, safety and environment, sustainability, and supply chain compliance.

Additionally, across BOC, ELGAS and SPW, we reserve the right to require an independent audit be undertaken to verify our suppliers' compliance with the Linde Supplier Code of Conduct.

Potential modern slavery risks and actions taken

As part of our efforts to reduce the risks of modern slavery in our operations and supply chain, Linde South Pacific has reviewed our businesses to identify potential risks and determine appropriate actions to address these risks.

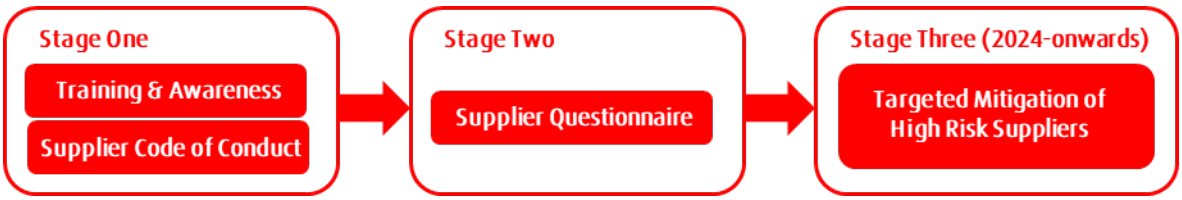
Over the last three years, we have built off our multi-stage Modern Slavery Action Plan. This has seen Stage One and Stage Two focus on training and awareness, supplier code of conduct and our supplier questionnaires via the Ethixbase360 tool. These actions enable us to meet our modern slavery legislative requirements.

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 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 those in Australia and New Zealand.

With this in mind, in the 2025 reporting period we continued Stage One, and Two and Three – which has become imbedded practices – and further expand our review of suppliers.

Modern Slavery Action Plan



Linde South Pacific training and awareness (Stage One)

As previously reported, since the initial launch of Modern Slavery Training in 2020, we continued to evolve and improve our approach. In 2023 we developed an updated and refreshed training module for Linde South Pacific employees and labour hire staff. Our Modern Slavery 2.0 training was launched in 2024 and completed by 432 learners in its first year. This module is automatically assigned to all new employees, including permanent staff, labour hire, and contractors and was expanded to include classroom-based training.

In 2025, 396 new starters completed the training, with the total workforce at the end of 2025 estimated at over 2,100 employees. Through our training we aim to further raise awareness and strengthen our collective efforts to combat modern slavery. The training covers:

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

In addition to Modern slavery training forming part of our employee onboarding process, Line Managers are provided with a Guide to Human Rights to support their teams.

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.

Supplier engagement (Stage One and Stage Two)

At a global and regional level, Linde has a long-established expectation when it comes to its people and suppliers protecting and promoting ethical sourcing best practices.

To align all parties, the Linde Supplier Code of Conduct – which includes local modern slavery concepts and obligations under the Modern Slavery Act 2018 (Cth) – is provided to suppliers outlining our requirement that our suppliers:

- Assess risks of modern slavery in their operations and supply chains and take action to reduce and control risks;
- 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);
- Provide all information that Linde South Pacific requires to enable Linde to prepare a public statement and report as required under Modern Slavery Legislation;
- 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;

- 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;
- Audit their own operations and supply chains in high-risk areas; and
- 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 have 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 2025 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. The Supplier Code of Conduct continues to be distributed to represent a far more comprehensive statement of Linde's values, including in relation to human rights, labour standards and supply chain compliance.

Linde South Pacific inspections of PNG and Solomon Island suppliers (Stage Three)

Our action has now expanded beyond auditing suppliers in Papua New Guinea and Solomon Islands. We are now identifying higher risk supplier segments and taking action to increase our visibility and reduce tiers of subcontracting.

This will continue into 2026 with the review of our grounds maintenance suppliers and the launch of One Trust that completes additional due diligence when onboarding suppliers that are acting on our behalf with government officials and within business development.

In 2025, the inspections comprised interviews, employee-targeted modern slavery questionnaires and site visits to eight entities including transportation and facilities management suppliers in Papua New Guinea and the Solomon Islands. To date, no instances of modern slavery have been found.

Targeted consolidation of cleaning and security suppliers

During the 2025 reporting period, we identified cleaning and security services as higher-risk categories for modern slavery due to labour-intensive work, use of subcontracting, and historically limited visibility of downstream labour practices.

In response, we undertook a targeted review of these supplier categories and consolidated cleaning and security services under a single approved supplier for our BOC and SPW businesses. This initiative removed multiple tiers of subcontracting that previously existed and significantly simplified the structure of these services. This consolidation provides a single point of accountability, strengthens contractual leverage, and improves our ability to monitor labour practices, enforce compliance with our Supplier Code of Conduct, and respond promptly to any issues that may arise.

The effectiveness this targeted consolidation is assessed through:

- Supplier performance reviews and compliance discussions focused on labour practices and worker protections
- Improved visibility of workforce arrangements through a single supplier relationship
- Efficient engagement, monitoring and issue escalation via a single point of contact

This initiative has strengthened our ability to identify, manage and mitigate modern slavery risks in a category recognised as higher risk and will continue to be monitored as part of our ongoing supplier risk management program.

Supply chain transparency

Ethixbase360 supports our efforts to achieve supply chain transparency. 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 in 2023.

In order to maximise these efforts, in 2025 we continued to complete surveys with our suppliers, whilst simultaneously taking a more concentrated approach to higher spend suppliers and those that could be perceived as high risk. The online tool allows us to receive valuable modern slavery risk data via an easy to navigate dashboard.

Effectiveness of our actions in combating modern slavery

Clear and easy to follow instructions around what to do if modern slavery or any compliance concerns are suspected are included as part of our extensive Compliance, and Modern Slavery training programs for our people. This includes reporting concerns through our external and independent integrity hotline available across the globe. In the reporting region, the level and number of complaints lodged (and subsequently investigated) via the integrity hotline confirms our people are engaged and aware of compliance risks. It is important to note that in the reporting period, no complaints through internal management channels, or to the integrity line, related to Modern Slavery.

Externally, our program of supplier questionnaires and on-site supplier visits completed in 2025 and previously, continue to provide meaningful insights into the effectiveness of our efforts to remove the risks of modern slavery.

Supporting integrity 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.

In an effort to support transparency, Linde South Pacific continues to engage Navex Global to provide an independent integrity line and portal which is accessible from our intranet and available to all employees and contractors. Frequent reminders are sent to employees reminding them how to access the Integrity Line, and their responsibility to report incidents that don't meet our values or standards.

Our Values

Our values are at the centre of everything we do and are crucial to us realising our mission of making our world more productive.

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.

Supporting our workforce

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 regularly. 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. In addition to our independent integrity line and portal 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.

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. All employees are engaged in a series of annual 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 previously mentioned 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 are actively reducing our potential sources of risk by introducing a personnel identity checking program and educating our employees in our Code of Business Integrity to continue to truly embed the policies identified above. Our in person Modern Slavery training sessions ensure a consistent message reaches all our employees.

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