

**BOC**  
A Linde company

**ELGAS**

**SPW**  
SOUTH PACIFIC WELDING GROUP PTY LTD



# Message from the Managing Director, South Pacific

The International Labour Organization (ILO) estimates there are approximately 40 million victims of modern slavery worldwide. ^ This equates to 5.4 victims of modern slavery to every 1,000 people in the world.

Linde abides by the principles of the International Bill of Human Rights enacted by the United Nations, and does not condone nor engage in discrimination, harassment, violations of privacy, slavery or servitude, restrictions on free assembly or unfair employment practices and expects similar standards to be observed by all with whom we conduct business.

BOC, Elgas and SPW, subsidiaries of Linde plc, are committed to achieving our goals ethically and improving the communities where we live and work. As part of one of the World's Most Ethical Companies in 2022\* integrity is a core value, and we aim each and every day to reach the highest standards as an organisation.

The Modern Slavery Act is an important piece of legislation that protects the most vulnerable in our society both here in Australia and across the globe. This report outlines the steps we are taking to identify and reduce the risk of modern slavery across our operations and supply chains.

We have also moved forward in our modern slavery journey through closer engagement with our suppliers and continuing to train our employees, with the vast majority of our personnel now having completed this training.

By holding ourselves, and our suppliers, accountable we can work together to help prevent modern slavery.



John Evans  
Managing Director, South Pacific

\*<https://worldsmoethicalcompanies.com/honorees/linde-plc/>

^ [ILO Global Estimates of Modern Slavery](#)



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## Section one:

# Introduction and process of consultation with subsidiaries



# 2021 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 document.

This statement has been prepared in accordance with the Modern Slavery Act 2018 (Cth) (“Act”) and covers the reporting period from 1 January 2021 to 31 December 2021.

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 Act.



# Consultation process

The consultation process for this statement was managed by BOC, and involved respective leaders from BOC, Elgas and SPW across the South Pacific region. A Modern Slavery project management team was set up to aid in the creation of 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 BOC Regional Executive Board in accordance with section 14(2)(d)(ii) of the Act. The BOC Regional Executive Board is comprised of respective leaders from BOC, SPW and Elgas who are deemed central and critical to the strategic decisions of the business and delivery to customers.



# Introduction

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 plc, 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:

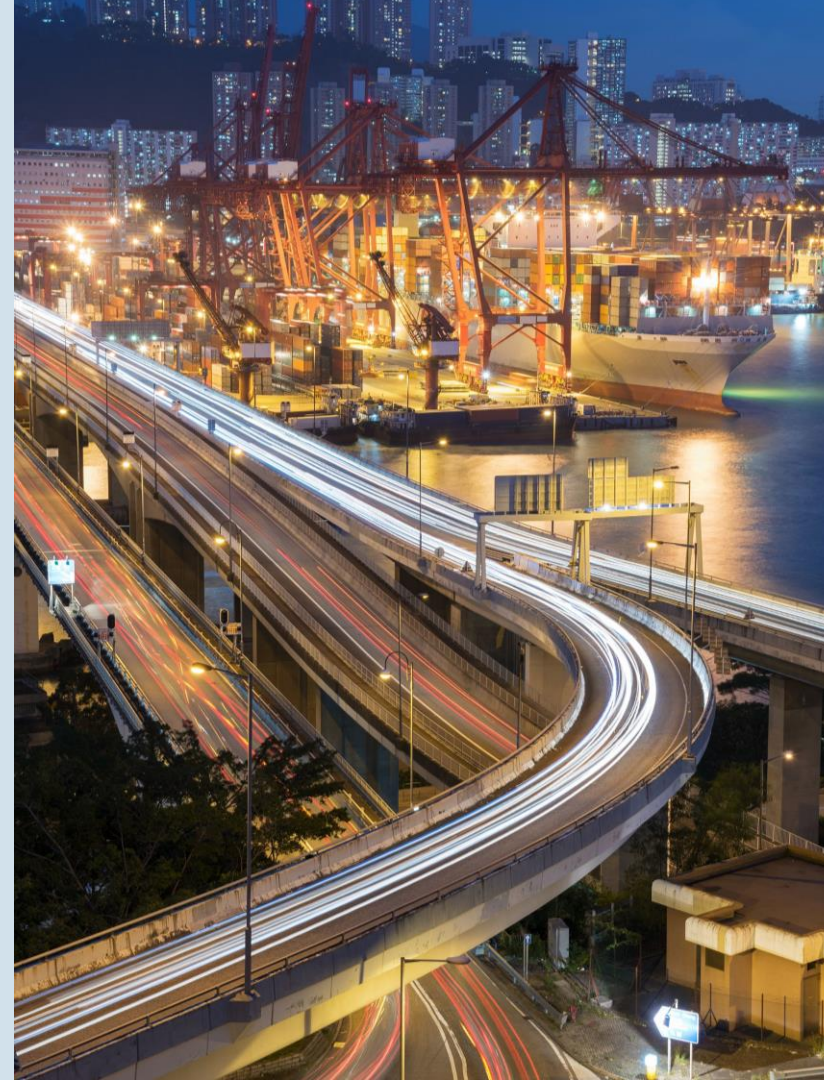
- Human trafficking
- Slavery
- Servitude
- Forced labour
- Debt bondage
- Forced marriage, and
- Child labour.

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 plc.

## Linde plc

Linde plc is a leading industrial gases and engineering company employing over 74,000 people globally and serving customers in more than 100 countries worldwide.

## 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.

## Australian Head Office

North Ryde, NSW

1925

Commenced operation in Australia

~1,800

Employees

~900

Equipment partners, gas agents and distributors

78

Gas & Gear retail stores and depots

350,000

Delivery points for cylinder gases

12

Industrial and medical filling sites

60

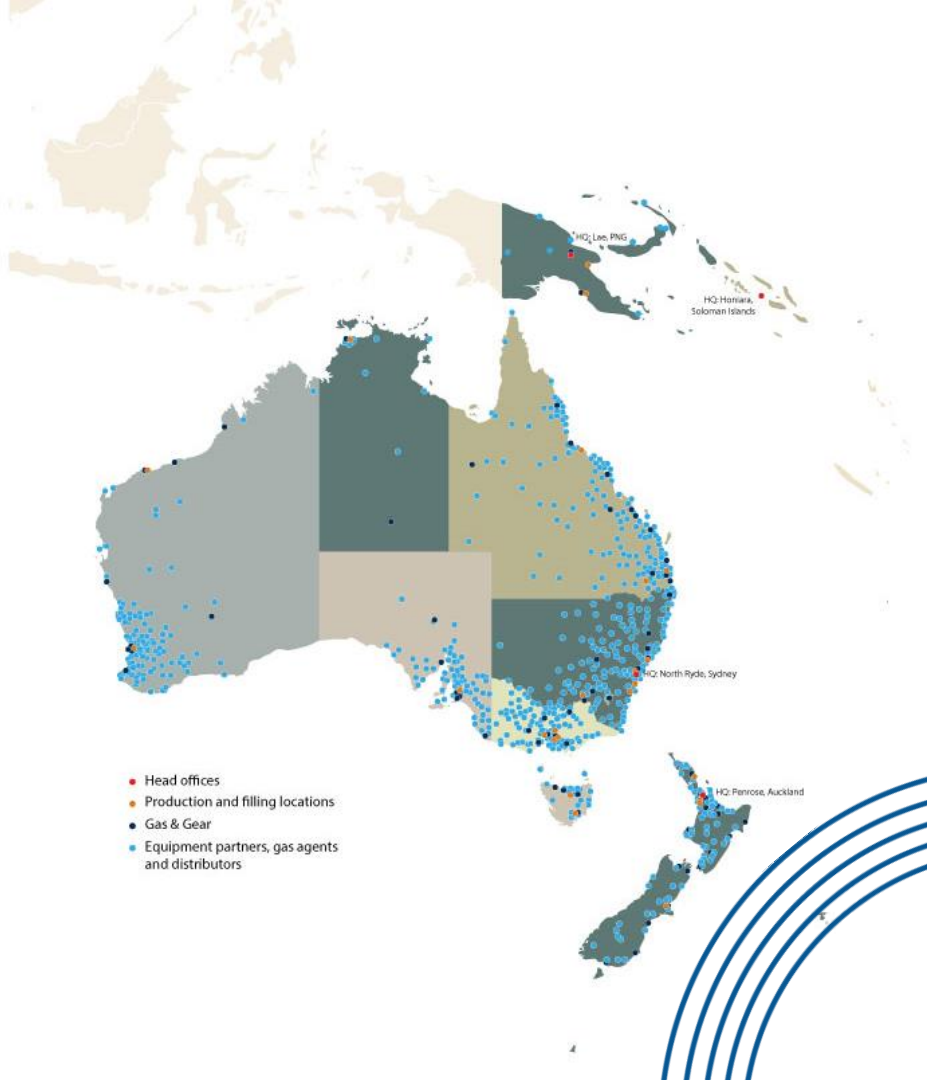
LPG filling sites



# Operations

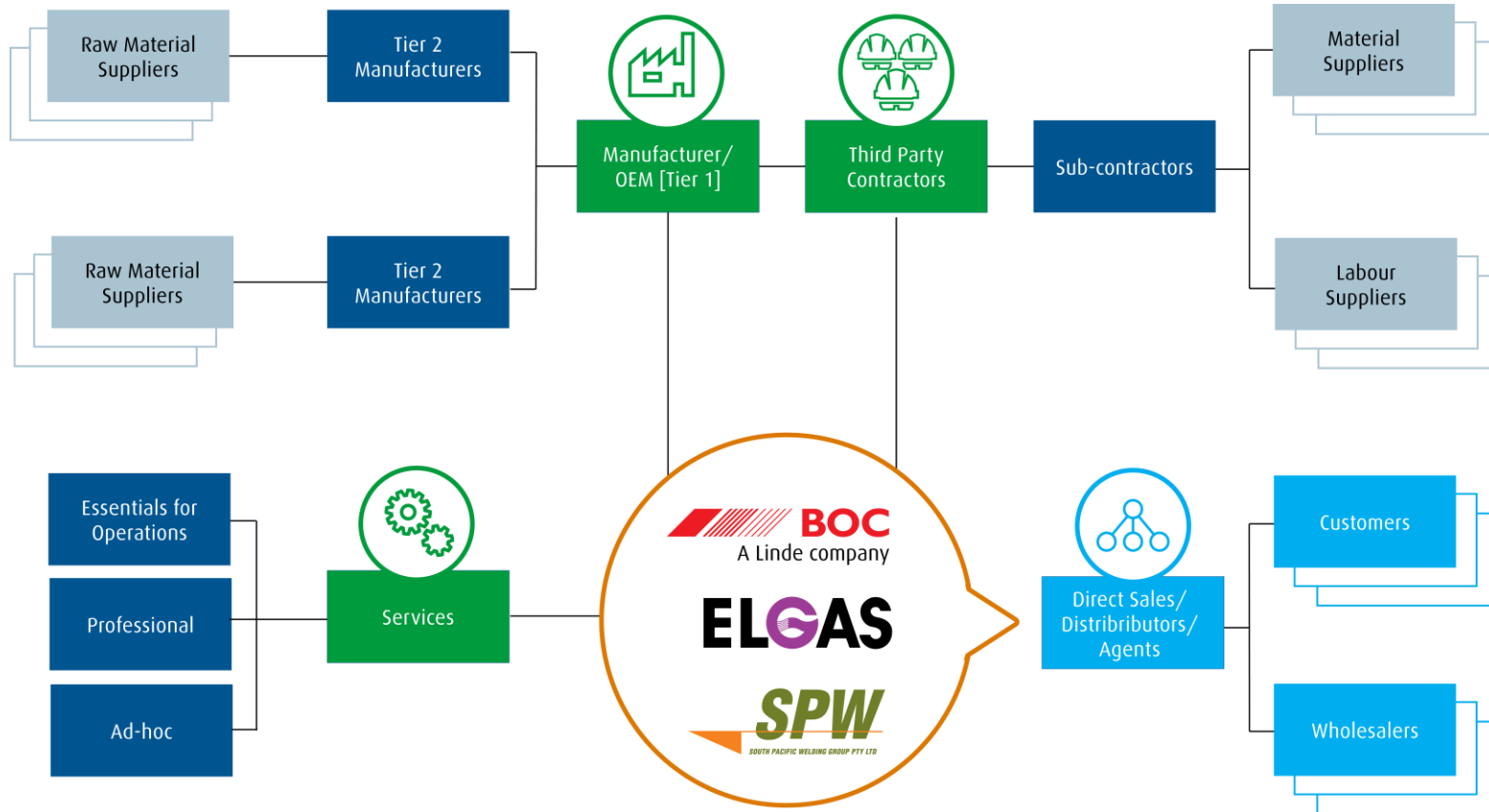
We recognise that the nature of the operational activities in which we engage subjects Linde South Pacific, our employees and, to some degree, our customers to legislative and industry requirements. It is our policy to ensure that all employees and contractors perform their duties within full compliance 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 ensure that adequate resources and systems are provided within Linde South Pacific to monitor, evaluate, implement, and verify that compliance is being maintained.

BOC, for example, operates one of the largest national distribution networks in the South Pacific region, as demonstrated in this map.

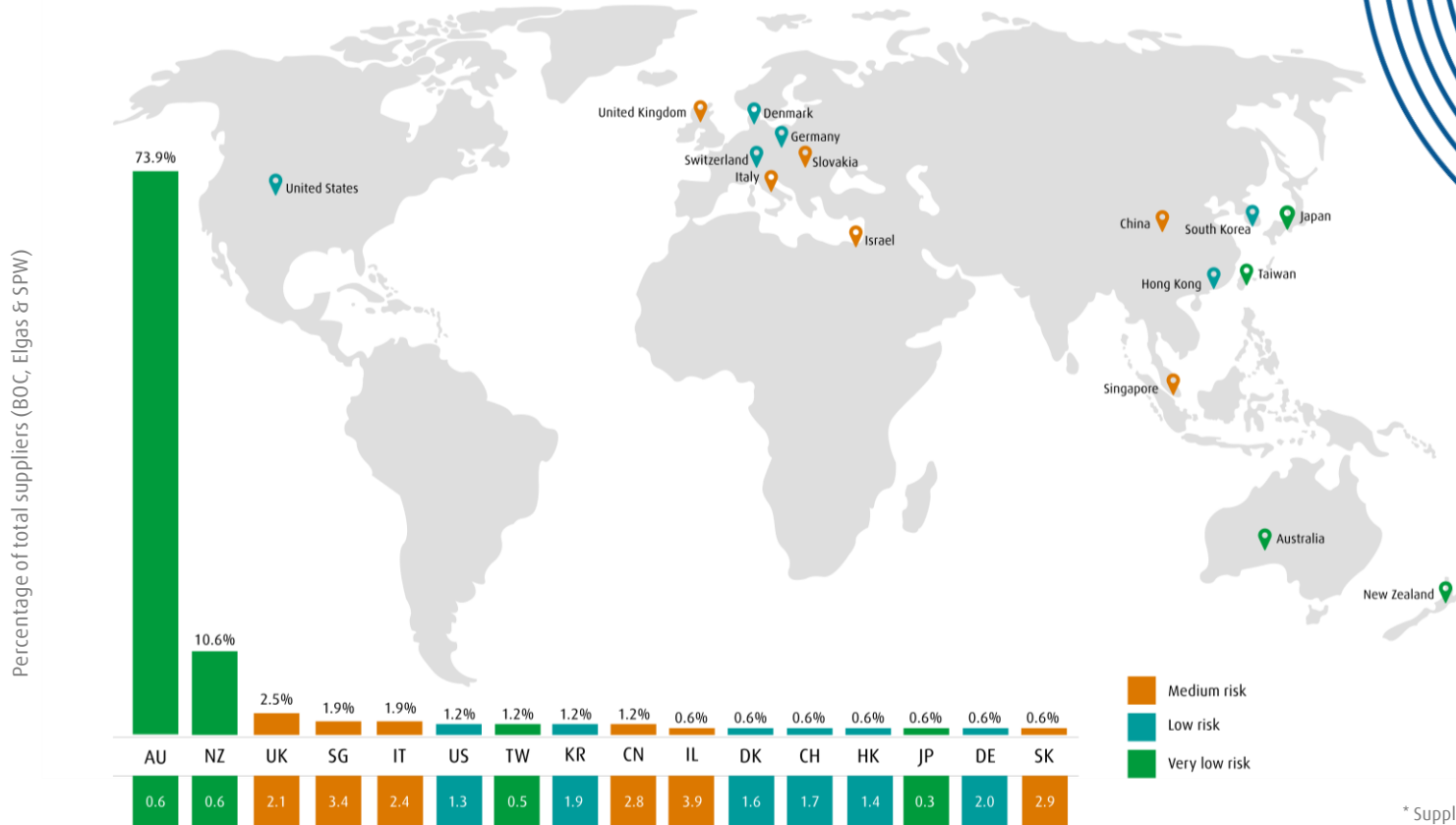


\* Image is for illustrative purposes only

# 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, 2018

# BOC

## 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 plc network or through accredited scientific laboratories. High volumes of industrial gases may be sourced from other Linde plc 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 12 for an amalgamation of all group suppliers).



## 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\*.

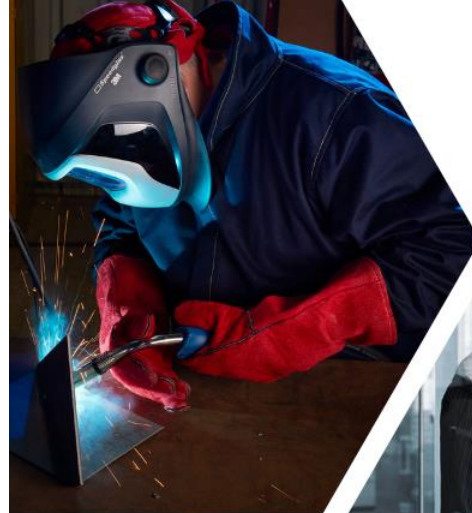
Elgas is dedicated to the safety of its customers, employees and the communities in which they live.

## SPW Group

SPW specialises in welding which includes equipment, safety PPE, consumables, service, and hire equipment, and solutions for most welding processes. SPW delivers a national specialised welding supply chain. We are a major distributor of leading recognised welding and cutting brands, and imports quality products from many different locations around the world\*.

## Shared services: Linde South Pacific

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



# 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 plc 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 plc are required to maintain their relationships with customers, suppliers, governments, other businesses, the environment and people.

It outlines Linde plc'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, sustainability and respect.

## **Linde Code of Conduct for Suppliers**

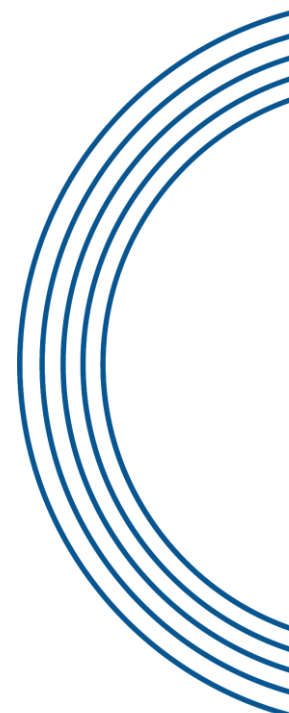
Linde South Pacific also share these principles with our suppliers through the [Linde Code of Conduct for Suppliers](#) which informs our suppliers of the minimum requirements for health and safety, environmental protection, legal compliance and integrity, human rights and labour standards, including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

## **Sustainable Development**

Linde plc'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 plc 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 plc'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 plc's Management Committee is the senior executive responsible for this area. Linde's Sustainable Development Report can be found [here](#).



## Section three:

# Potential modern slavery risks and actions taken



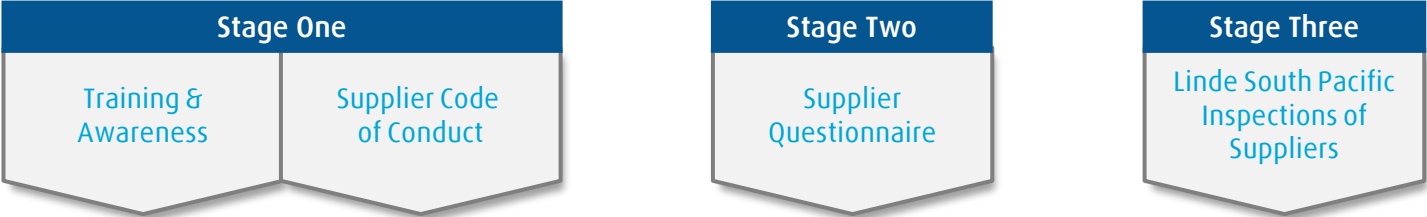


Linde South Pacific have considered our operations and supply chains to identify potential modern slavery risks and determine appropriate actions to address these risks.

For its 2020 statement, Linde South Pacific conducted workshops with relevant areas of our businesses to build understanding of modern slavery risks, identify potential risk areas including industries and geographies with a higher risk profile and build a priority action plan. Throughout 2021, we continued to hold regular meetings with a targeted audience comprising stakeholders from key business areas to further our efforts in the Modern Slavery space.

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 vast 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 pages.

Our stage one actions focused on building awareness through communications and training. We then reviewed our suppliers and communicated our expectations to them via the Linde Code of Supplier Conduct. Stage two involved a 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. Stage three was kicked off in 2021 and involved further entrenching our training and awareness programs, and launching our own inspections of suppliers in higher risk areas.



# 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 & New Zealand

Linde South Pacific operate 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 are 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 good business. Employees have access to 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. The 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. We also offer a wellbeing program called ‘Mind, Move, Munch’ to help employees be proactive in taking care of all facets of their health. The Employee Assistance Program and our Wellbeing Program are both regularly promoted to our employees.



# Employees in Australia & New Zealand

Early in 2021 we ran a mental health and wellbeing survey, with the objective of measuring the key psychosocial factors in our workplace and to provide our employees with the opportunity to have their say. Their feedback has been taken on board and as a result we established the Mental Wellbeing Working Group. The group's key objective is to establish, promote and maintain the mental health and wellbeing of staff through our work practices and breakdown any stigma's relating to mental health. Their first step was to produce and launch the Mental Wellbeing Policy to assist in defining the company's commitment relating to mental health and wellbeing and highlighting desired wellbeing values and principles.

The group also developed the South Pacific Mental Wellbeing Hub, a resource containing information and tools to assist employees to learn more about mental health and wellbeing and assistance available if required.

We believe in improving the communities where we live and work, and that giving back to our communities 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 our partner charities, taking the time to volunteer each year through our paid volunteer leave plan, 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, where employees are 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 & New Zealand

Linde South Pacific has a managed service provider resourcing model to manage our contingent workforce, and our labour hire providers support Linde South Pacific in minimising the risks of modern slavery.

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 & 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 2021, 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 on page 21 below.



# Linde South Pacific training and awareness

During 2020, both a Modern Slavery internal communication campaign and a Modern Slavery training program (through e-Learning platforms and toolbox sessions) was developed and rolled out to Linde South Pacific employees and labour hire staff to raise awareness of and provide training in relation to:

1. Modern Slavery reporting obligations;
2. An overview of the Modern Slavery Act (Cth);
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 plc'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.

Throughout 2021 we have continued this Modern Slavery training program and regularly review completion statistics.



# 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). A copy of Linde's Supplier Code of Conduct can be [found here](#).

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.

In 2020, we also prepared a new 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.



# Linde South Pacific Supplier Visits

The distribution of suppliers table from our 2020 Modern Slavery Statement identified that a small portion of our total suppliers were located in Papua New Guinea, which had been deemed high risk by the Walk Free Foundation, Global Slavery Index 2018. As a result, throughout 2021, we developed a visual inspection checklist and supplier employee questionnaire. We attended several supplier premises located in both Papua New Guinea and the Solomon Islands, for the purposes of undertaking a site visit. During these visits, we performed a visual inspection, interviewed random employees, and spoke with management. To encourage frank and open discussion, the supplier employee questionnaire was not provided to the suppliers in advance, nor were employees the subject of our interviews pre-selected. No modern slavery risks were identified during these supplier visits or in the answers received to the employee questionnaires. Our progress in organising these site visits was somewhat hampered by ongoing COVID restrictions during 2021, but we hope to continue meeting with our suppliers in those regions throughout 2022.





## Section four:

# Assessing the effectiveness of actions taken



Linde South Pacific is committed to 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 effectiveness of our Modern Slavery training implemented in 2020 and continued throughout 2021 was measured through a final test which employees and labour hire staff were required to take and pass, with the vast majority of our personnel now having completed this training.

### **Suppliers**

We are evaluating supplier responses to our modern slavery questionnaire as they are received and are continuing to investigate and research our supply chains to better understand the supply chain back to the raw materials.

### **Auditing**

In addition to the inspection process, we have started as mentioned on page 24, over the coming years, Linde South Pacific will be investigating and evaluating options for a risk-based auditing program. Existing activity across the global Linde plc business will be leveraged where possible.





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Elgas Limited  
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