

Whistleblowing Policy of Messer China

Objective

The policy is established to strengthen the internal control of Messer China, prevent fraud and violation of laws and regulations, and ensure compliance in daily operation.

Scope of Application

Any staff, supplier, customer or other third party can report any misconduct of Messer China employees that violates company policy, laws and regulations and that may bring negative impact to Messer China interest.

Handling of Whistleblowing

Responsible departments:

Auditing and Risk Control Department of Messer China

Human Resource Department of Messer China

Handling principle:

The responsible department will organize an investigation timely on receiving a report on misconduct; the investigation will attempt to describe the facts clearly and to provide effective clues or evidence. During the investigation process, all information has to be kept confidential to avoid obstruction of the investigation and retaliation to the whistleblower caused by a disclosure. No one has the right to intervene or disclose any information related to the reported misconduct without proper authorization.

We encourage whistleblowing under real name, and encourage the whistleblower to disclose his/her name and valid contact information. The responsible department will disclose the investigation result to the whistleblower.

Approach of Whistleblowing

A designated e-mail address and contact information are provided and disclosed on Messer China website. Report of misconduct by e-mail or by letter is acceptable.

Any report on misconduct should try to satisfy the following conditions as far as possible:

- 1) facts are clearly described ;
- 2) effective clues and evidence are provided in details as far as possible;
- 3) handwriting is readable in case of a handwritten letter.

Messer China E-mail address for whistleblowing:

whistleblowing@messer.com.cn

Messer China Contact information for whistleblowing:

Room 205, Building 3, 33 Suhong Road

Shanghai 200020, P.R.C.

Postal code: 201106

Recipients:

Director of Auditing and Risk Control Department

or

Director of Human Resource Department