

Mr Hans Hoogervorst  
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## Re: ED/2012/3 Equity Method: Share of Other Net Asset Changes - Proposed amendments to IAS 28

Dear Hans,

The Linde Group is a world-leading gases and engineering company with approximately 61.695 employees working in more than 100 countries worldwide. In the 2012 financial year it achieved sales of EUR 15.3 billion. We offer a wide range of compressed and liquefied gases as well as chemicals and we are therefore an important and reliable partner for a huge variety of industries. Our engineering division is successful throughout the world, with its focus on promising market segments such as olefin plants, natural gas plants and air separation plants, as well as hydrogen and synthesis gas plants.

The Linde Group is listed in the leading German share index (DAX) and prepares its consolidated financial statements in accordance with International Financial Reporting Standards as adopted by the European Union.

The Linde Group welcomes very much to have the possibility to comment on the IASB's Exposure Draft ED/2012/3 "Equity Method: Share of Other Net Asset Changes- Proposed amendments to IAS 28". We appreciate the efforts undertaken by the IASB to continuously improve the IFRS to develop a single set of high quality, understandable, enforceable and globally accepted financial reporting standards. Please find our remarks attached to this letter.

If you have any questions or remarks, please do not hesitate to contact us. We would be happy to discuss any of our comments with you at your convenience.

Yours sincerely,

Bjoern Schneider  
Head of Group Accounting & Reporting

Dr. Hans-Dieter Fladung  
Head of IFRS Competence Centre &  
External Reporting

**Appendix I: Answers to the questions raised in the ED**

**Question 1:**

The IASB proposes to amend IAS 28 so that an investor should recognise in the investor's equity its share of the changes in the net assets of the investee that are not recognised in profit or loss or OCI of the investee, and that are not distributions received.

Do you agree? Why or why not?

We agree with the proposed amendments.

**Question 2:**

The IASB also proposes that an investor shall reclassify to profit or loss the cumulative amount of equity that the investor had previously recognised when the investor discontinues the use of the equity method.

Do you agree? Why or why not?

We agree with the proposed amendments.

**Question 3:**

Do you have any other comments on the proposals?

No.