



POWERED BY INTEGRITY

THE UGI SUPPLIER CODE OF BUSINESS
CONDUCT AND ETHICS

UGI
CORPORATION

A MESSAGE TO OUR SUPPLIERS

At UGI, we take pride in being champions of service, innovation and safety. However, it's our commitment to integrity that truly sets us apart. UGI's commitment to responsible business practices and responsible sourcing for products is set forth in our [Code of Business Conduct and Ethics](#), and we expect the business practices of our business partners to reflect our values and standards. To make sure our expectations are clear to everyone, we have developed this Supplier Code of Business Conduct and Ethics ("Supplier Code") applicable to suppliers, vendors, distributors, consultants, agents, and other third party entities conducting business for us or on our behalf ("Suppliers").

Simply put, we work honestly, ethically, and legally and we expect you to do the same.

UGI's Supplier Code outlines our expectations and requirements for all Suppliers of UGI or of any UGI affiliate. Our Supplier Code also supports our environmental, social and governance (ESG) commitments related to human rights and labor, respectful treatment and equal opportunity, anti-corruption, and environmental sustainability.

By adhering to our Supplier Code, you'll be doing your part to build a relationship **Powered by Integrity**.



SETTING EXPECTATIONS

WORKING WITH INTEGRITY

We have worked hard to build a reputation of integrity. Our supply chain is a vital part of this success. When conducting business with us or on our behalf, we expect you to perform at the highest standard of business conduct, and to make sure *your* employees and suppliers do the same.

FOLLOWING THE LAW

Regardless of the job you do or where you do it, you must conduct your business in full compliance with all applicable laws, regulations, guidelines, industry codes, and corporate codes (including this one).

SHARING CONCERNS

At UGI, we take pride in our “Open Door” culture, which fosters open communication and sharing of concerns. If you have a question or are unsure about the right thing to do, ask us.

If you observe or suspect a violation of our Supplier Code or observe something that just does not seem right, we encourage you to report it to your UGI contact or our Integrity Helpline without hesitation. UGI prohibits retaliation against anyone who comes forward in good faith. We review all concerns promptly and share relevant information only with those who need to know to investigate and resolve the underlying issue.

UGI’s Integrity Helpline is available any time, day or night, either by phone or online. It is staffed by an independent third-party company and gives you the option to remain anonymous, where permitted by law. Translation services are also available. You can access the Helpline at [UGI/AmeriGas Integrity Helpline](#).

If we determine that our Supplier Code, a policy, or a law has been violated, we will take appropriate corrective action.

THE UGI/AMERIGAS INTEGRITY HELPLINE

24 HOURS A DAY / 7 DAYS A WEEK



SHARE YOUR CONCERN ONLINE:

<https://ugiamerigasethicshelpline.tnwreports.com>



SHARE YOUR CONCERN VIA PHONE:

In the United States,
call toll-free: 866-384-4272

For all other countries, access
dialing instructions here:

<https://ugiamerigasethicshelpline.tnwreports.com/Phone>

UNDERSTANDING YOUR OBLIGATIONS TO UGI

PROMOTING HEALTH AND SAFETY

Safety is our highest priority. At UGI, we look out for each other and take action whenever we see potential hazards, such as substance abuse, violence, unsafe working conditions, or security violations. To promote our safety mindset, we also expect you to put in place your own safety and health practices within your business (e.g., safe equipment and training).



MAINTAINING A RESPECTFUL WORKPLACE

DIVERSITY AND EQUAL OPPORTUNITY

We embrace the diversity and uniqueness of individuals and cultures and the varied perspectives they provide. At UGI, we celebrate diversity, respect others, and do our part to create an inclusive work environment. And we require our Suppliers to do the same: to honor cultural differences and never make decisions based on protected characteristics (such as, race, color, national origin, religion, sex, age, marital status, disability, veteran status, sexual orientation, gender identity, or gender expression).

ANTI-HARASSMENT

We believe every individual has a right to work free from harassment, including sexual harassment, bullying, and abusive conduct. Harassment can be verbal, physical, or visual. It can happen inside or outside of the workplace, and it may be directed at employees, customers, contractors, and other suppliers. No matter what form it takes, it is strictly prohibited at UGI and we expect our Suppliers to help us maintain a respectful workplace and to report harassment if you suspect, see, or experience it.

INTERACTING WITH THE GOVERNMENT

We value an open and transparent relationship with the government and regulatory officials. We require our Suppliers to do the same: to follow the rules that relate to our government business; to compete fairly; to protect government property and information; to properly conduct all tests and inspections; and to make sure all representations and certifications that you submit are accurate and truthful.

CONDUCTING BUSINESS RESPONSIBLY

COMPETING FAIRLY

We believe in a free and open marketplace and in protecting consumers from anti-competitive conduct. We require our Suppliers: to follow all antitrust and competition laws; to never agree – or appear to agree – with competitors to restrict trade, limit production, or boycott others; to not discuss pricing, bidding or costs with your competitors; to be transparent in all of your dealings; and to be honest about UGI and your relationship with us.

PREVENTING BRIBERY AND CORRUPTION

We do business with integrity. This means that we don't offer bribes, accept bribes, or ask anyone to bribe on our behalf. We also expect our Suppliers to never offer, give, promise, or accept anything of value – either directly or indirectly – in order to get business, keep business, or gain an unfair advantage.

Bribery laws vary from country to country, and some countries impose more severe penalties for bribing government officials, but our policy is simple: don't bribe anyone, at any level, at any organization. Never use your governmental contacts or any connections with persons in authority to obtain undue favors or preferential treatment in return for payment – this is known as “influence peddling” and it violates our policies and the law.

Do not offer anything of value to a government official or employee without getting approval in advance. Never make a payment to a government official to speed up an action, like processing paperwork. Such payments are called “facilitating” or “grease” payments and are not permitted under our policies, even when permitted under local law. We require you to abide by the same rules.

AVOIDING INSIDER TRADING

Through our work, we may become aware of information that is not known to the public and could affect a decision to invest in stock or other securities (“Inside Information”). We never trade, or tip others so they may trade, on Inside Information. As our Supplier, we expect the same from you: do not trade in any publicly traded securities, including UGI's, if you have been exposed to Inside Information, and never share Inside Information with those who don't need it to do their job.

CONDUCTING BUSINESS BEYOND BORDERS

We serve customers, engage with business partners, and comply with trade laws all over the world. As our Supplier, we expect you to know, understand, and follow the requirements that apply to your products, services, and technologies. Applicable Suppliers must fully comply with the U.S. Foreign Corrupt Practices Act, the UK Bribery Act 2010, Sapin II, and any other applicable corruption laws. Suppliers also may not accept or request any unlawful payments or things of value.

PRESERVING UGI'S REPUTATION

MAINTAINING FINANCIAL INTEGRITY

Good business records drive good business decisions, and good business decisions inspire trust. Our Suppliers are required to create and maintain records that comply with all applicable laws, regulations, guidelines, industry codes, and corporate codes. You must never alter, falsify, remove, or destroy any record or document related to our company or our business, and you must never lie to anyone when working on our behalf. We expect you to help us maintain financial integrity by recording transactions honestly and accurately and speaking up about any suspicious activity.

PROTECTING:

CONFIDENTIAL INFORMATION

Our Suppliers will collect, use, and handle information responsibly. We expect our Suppliers to protect confidential information about our company, our employees, our customers, and other companies with which we work and to protect our patents, trademarks, copyrights, trade secrets, and data/data analytics.

In addition, our procurement related transactions are considered confidential, and must not be shared with people outside the Company, such as other suppliers or competitors.

Information can be exposed in many ways, including through conversations in public places like restaurants and even elevators. It is important to watch not only what you say, but where you say it and to whom.

PRIVACY AND DATA

We expect you to protect all information with which you are entrusted by safeguarding it against inadvertent or unauthorized disclosure and using commercially reasonable controls and encryption to prevent it from coming into the hands of unintended recipients. Keep private information private. Follow applicable data protection laws, observe adequate security measures, and handle personal information with care. Use it in the way you agreed, and do your part to avoid destruction, loss, alteration, or unauthorized access. If you become aware of any data breach, speak up immediately.



AVOIDING CONFLICTS OF INTEREST

We make objective, impartial business decisions. We expect our Suppliers to do the same. In your interactions with us or on our behalf, you must avoid any situation or relationship that creates – or appears to create – a potential conflict between your own interests and the interests of UGI. Conflicts can happen in situations involving outside employment, personal relationships, financial interests, board memberships, or business ventures. If one of your employees, officers, investors, or family members has a relationship with a UGI employee who can make decisions that may affect your business or if a UGI employee has an interest of any kind in your organization, we expect you to disclose it immediately, and to seek guidance to determine the appropriate course of action.

KNOWING THE RULES ABOUT GIFTS AND ENTERTAINMENT

We have rules in place that govern gifts and entertainment to avoid even the perception of anything improper. Offers should also be infrequent, of nominal value, and never be in the form of cash (or cash equivalents). Gifts or entertainment may never influence the decisions we make. UGI employees will refuse or return anything inappropriate. For the avoidance of doubt, we recognize that sharing meals and entertainment is common in business and supports the development of a relationship. UGI employees may accept occasional meals from Suppliers if they also attend, and the costs are reasonable and customary. However, UGI employees involved in procurement activities are expressly prohibited from accepting gifts or entertainment from a Supplier while there is an active bid or negotiation taking place. Suppliers are not allowed to give gifts to or entertain UGI employees other than as described above.



SUPPORTING THE COMMUNITY

PROTECTING THE ENVIRONMENT

We protect the environment where we live and work. Our Suppliers are expected to honor our commitment to sustainability and the responsible use of natural resources. We encourage you to look for ways to recycle, invest in alternative energy sources, and dispose of waste in environmentally sound ways. If an incident occurs that threatens the health, safety, security, or environment in or around the places we operate, you must notify the appropriate authorities immediately, as well as your UGI contact.

Suppliers must work to prevent accidental or deliberate releases of hazardous materials, including wastewater and solid waste and air emissions of volatile chemicals or other substances, that would violate applicable laws or cause adverse environmental impacts on the local community.

As our Supplier, we expect you to comply with all environmental laws, regulations, guidelines, and industry codes. You must obtain all required environmental permits, licenses, information registrations, and restrictions and follow operational and reporting requirements, as applicable.

HONORING HUMAN RIGHTS

We are committed to treating all people with dignity and respect. And our Suppliers must conduct business in a way that respects the dignity of all by: supporting international efforts to protect human rights, including an absolute opposition to slavery and human trafficking, child labor, and forced labor; and establishing reasonable working hours, fair wages, and safe working conditions.

Suppliers must respect the rights of workers to freely associate, organize and bargain collectively in accordance with applicable laws and the customs of the countries in which they are employed. Suppliers must respect the rights of workers to communicate openly with management or with each other regarding working conditions without fear of retaliation, harassment, intimidation, penalty, or interference.

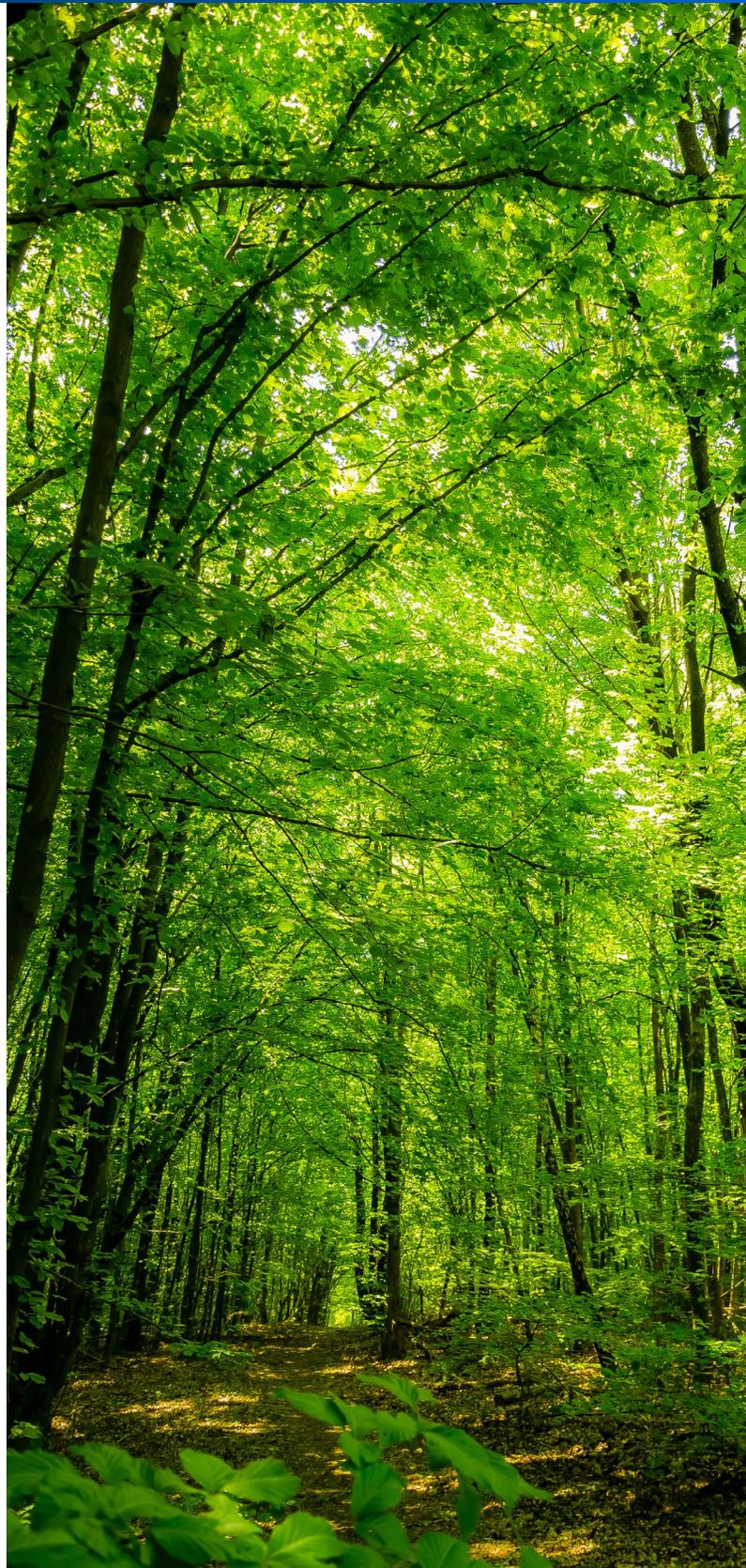
UGI adheres to applicable laws, rules, and regulations, and our policies generally follow principles set forth by the International Labour Organization (“ILO”), and we expect our Suppliers to do the same. And we expect you to choose your suppliers responsibly, to monitor them closely, and to take corrective action when needed.



SOURCING ETHICALLY AND SUSTAINABLY

UGI is committed to increasing investments with small businesses owned by minorities, women, LGBTQ, individuals with disabilities, veterans, or others who represent global diversity. We strongly believe in corporate social responsibility and value different ethnicities, genders, and backgrounds. We expect you to make a similar commitment and we appreciate your efforts to develop partnerships with qualified small businesses and companies in distressed communities to promote greater economic growth and development.

Suppliers are expected to respond to applicable sustainability reporting requests. UGI strives toward greater traceability of our supply chain to assess and monitor associated risks. We expect existing and potential Suppliers to support these initiatives. This may include responding to our information requests regarding sustainability commitments and progress — such as environmental footprint reporting, supply chain traceability, and third-party verification. This information may be considered in our selection decisions and our willingness to continue doing business with any Supplier. UGI may also periodically assess and audit Suppliers in fields such as environmental performance, health and safety, human rights, ethics, and fair competition. If a Supplier is not acting in accordance with applicable sustainability goals, we may implement corrective steps to address these concerns, including education, formal warnings, and, when warranted, termination of the relationship.



CLOSING THOUGHTS

At UGI, integrity powers everything we do – and it has done so, every day, since our founding almost 140 years ago. We remain committed to carrying on our strong tradition of ethical conduct into the future ... and that depends on you.

Suppliers must communicate the principles and expectations set out in UGI's Supplier Code to their workers and business partners in a manner understandable to all. In order to satisfy this obligation, we encourage Suppliers to develop and maintain internal training, policies, and/or codes to ensure that their workers and business partners assisting with UGI business understand the principles and expectations set out in our Supplier Code. UGI may periodically request Suppliers and their workers to attend trainings on compliance topics conducted by UGI or on UGI's behalf. Failure to make reasonable efforts to participate in such trainings upon request is a violation of the Supplier Code.

Suppliers must be able to demonstrate compliance with the principles of UGI's Supplier Code. Compliance with the principles of the Supplier Code and all applicable laws is a material condition of continued business with UGI, and Suppliers may not do indirectly what the Code forbids business partners from doing directly. If you engage in conduct that is unlawful or inconsistent with our Supplier Code, you risk, among other remedies, termination of your relationship with UGI.

Thank you for reading our Supplier Code and for committing to meet these expectations.

If we each work honestly, ethically, and legally, not only will we meet our extraordinary business goals, we will do so in extraordinary ways.





THE UGI SUPPLIER CODE OF BUSINESS CONDUCT AND ETHICS 2020