Powered by Integrity

THE UGI SUPPLIER CODE OF BUSINESS CONDUCT AND ETHICS



UGI CORPORATION · AmeriGas · Mountaineer Gas Company · UGI Energy Services · UGI INTERNATIONAL · UGI Energy to do more®

WELCOME TO UGI



At UGI, we deliver positive energy every day – the kind that strengthens communities, supports businesses, and builds trust. As one of our valued business partners, you play a key role in helping us uphold this commitment with integrity.

While our employees turn to our *Code of Business Conduct and Ethics* to bring our Values to life and uphold the Stands defining our culture, we rely on you to uphold this Supplier Code of Business Conduct and Ethics (Supplier Code). It's your guide to reflecting these same principles in the way you operate.

The Supplier Code applies to every UGI supplier, vendor, distributor, consultant, agent, and other third parties who do business for us or on our behalf (Suppliers). It's an extension of who we are and what we expect from you: a partner that operates ethically, prioritizes safety, respects people, fights corruption, and protects the environment.

When you partner with UGI, you are a reflection of us. And when everyone in your organization and supply chain follows this Supplier Code, you become part of a team that's **POWERED BY INTEGRITY.**

WHAT WE BELIEVE

OUR PURPOSE:

Delivering Positive Energy Every Day.

OUR VALUES:

- PROBLEM SOLVERS
- OWNERS
- ETHICAL
- TOGETHER
- INNOVATIVE
- COURAGEOUS

These Values guide how we work, and how we expect our Suppliers to work alongside us.



WE ARE COMMITTED

MEET OUR EXPECTATIONS

Integrity shapes every decision we make at UGI. Each person across our Company and supply chain impacts our reputation through their choices and actions. That's why when you work with us or represent us, we expect you, and everyone who works for you, to meet the highest standards of business conduct.

UGI expects you to:

- Acknowledge your commitment to this Code and uphold it, along with our policies and the law.
- Adopt responsible and ethical business practices throughout your operations and supply chain.
- Fulfill your contract, keep your promises and protect UGI's name and reputation.
- Protect the human rights of workers and ensure a safe, healthy work environment.
- Minimize your environmental impact.
- Speak up to a UGI resource when you have questions or concerns.
- Flow these standards down to your own subcontractors, vendors, and business partners, and take responsibility for their compliance.

As your partner, we are committed to upholding these and all other standards described in this Code. We also pledge to be good partners, acting fairly, honestly, and respectfully in every interaction. Note that UGI's contractual requirements, including those in your contract, supplement this Code and may contain additional or more specific obligations.

WE MONITOR COMPLIANCE

UGI developed this Supplier Code to help us grow mutually beneficial relationships, and we expect our suppliers to follow all its requirements. Failing to comply with the Code or the law may result in a breach of our supplier agreement and potential corrective action, including termination of our contract.

FOLLOW THE LAW

Wherever you work and no matter what role you play, you're responsible for doing business the right way. That means complying fully with all laws that apply in the countries where you work, along with applicable regulations, guidelines, industry codes, and UGI's Supplier Code and policies.

SHARE CONCERNS

We take pride in our “Open Door” culture at UGI. If you have a question, see something that concerns you, or you aren’t sure of the right step to take, we encourage you to reach out and ask us.

If you suspect or know of an actual violation of our Supplier Code, or you see something that doesn’t seem right, report it to your UGI contact or our Integrity Helpline immediately. UGI’s Integrity Helpline is available not only to UGI employees but also to employees of our Suppliers who wish to raise concerns about potential violations of this Code or applicable law. Suppliers operating in jurisdictions with whistleblower protection laws should be aware that UGI is committed to honoring those protections for all who use our reporting channels.

UGI prohibits retaliation against anyone who shares a concern, participates in an investigation, or exercises their legal rights. We review all concerns promptly, investigate thoroughly, and resolve the underlying issue.

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

However you choose to speak up,
your concern will be handled promptly and discreetly.

THE UGI INTEGRITY HELPLINE IS AVAILABLE 24/7

Two ways to reach us:

Online

Phone: 866-384-4272 *(US toll-free)*

International dialing instructions

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About the UGI Integrity Helpline:

The UGI Integrity Helpline is run by an independent third-party company. You may remain anonymous where allowed by law, and translation services are available.

When you contact the UGI Integrity Helpline, a specialist documents your concern and forwards it to the UGI Ethics & Compliance Group.



WE ARE SAFE AND RESPECTFUL

STRENGTHEN OUR FOUNDATION OF SAFETY

Nothing is more important than the physical and mental well-being of our people and communities. At UGI, we care for the whole person, ensuring everyone can thrive physically, mentally, and emotionally. Support this mindset by maintaining strong safety and health practices in your operations, ensuring compliance with safety policies and procedures, maintaining physical security, and providing proper equipment and training. If you see potential safety hazards, including substance abuse, violence, unsafe working conditions, or security violations, take action by speaking up.

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SUPPORT EQUAL OPPORTUNITY AND NON-DISCRIMINATION

We know different backgrounds, experiences, and perspectives make UGI stronger. It's why we maintain an inclusive work environment that highlights equal opportunity. We expect the same from our Suppliers. Work to create a fair, inclusive, and welcoming workplace where everyone can thrive. Honor cultural differences and never make employment decisions based on protected characteristics, including age, race, religion, gender, marital status, national origin, veteran status, disability, and sexual orientation.

SAFEGUARD AGAINST HARASSMENT

We believe every individual deserves to work in an environment free from harassment, including sexual harassment, bullying, and abusive conduct. Harassment can include offensive comments, jokes, slurs, unwelcome touching, intimidation, aggressive behavior, or inappropriate images or displays. It can happen inside or outside of the workplace and be directed at employees, customers, contractors, or other business partners. UGI prohibits any kind of harassment, and we expect our Suppliers to ensure people are treated with dignity and respect and are encouraged to report harassment if they suspect or experience it.

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PROVIDE SAFE, HIGH-QUALITY PRODUCTS AND SERVICES

At UGI, we are committed to ensuring the safety and quality of our products and services. To preserve our reputation for excellence and give customers our best, we and our Suppliers must adopt rigorous quality, safety, and security standards and follow them carefully. Make quality and safety a top priority and comply with all standards, laws, guidelines, and requirements that apply to your business, including Operator Qualifications to ensure safe and reliable operations.

WE ARE ETHICAL

PARTNER ETHICALLY

We believe relationships are essential to UGI's success, so we build and maintain them with great care. Our Suppliers must do likewise, grounding each of their relationships in integrity, honesty, and fairness:

WITH CUSTOMERS

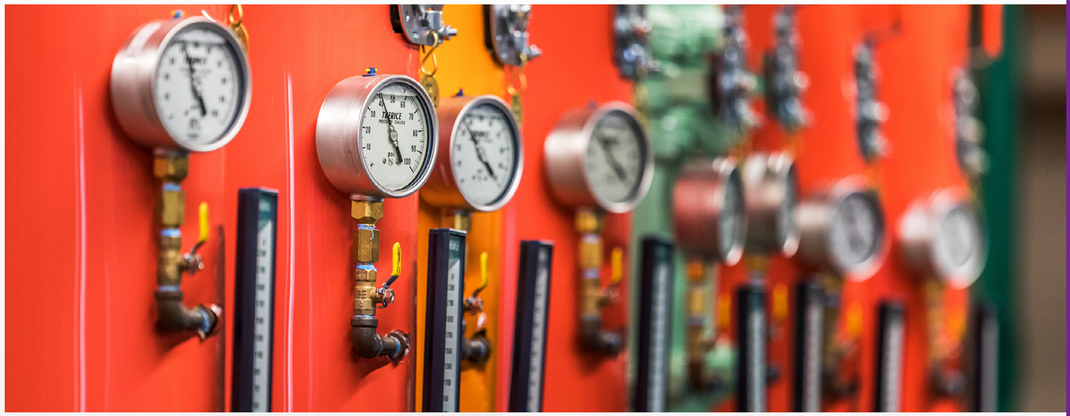
Be transparent, honest, professional, and responsive in all customer interactions. Never manipulate, conceal, or misrepresent facts, including in advertising, sales, and promotional materials. Provide accurate information, aligned with branding guidelines and applicable laws. Also follow our agreement with you to ensure that you protect customer data and respect privacy, never using confidential information without permission. See the section "We Are Kind" in this Supplier Code.

WITH THIRD PARTIES

We pay close attention to business practices throughout our supply chain. That is why we expect you to choose your own business partners fairly and carefully and monitor their work. Check to ensure they deliver quality goods and services, fulfill contractual obligations, and use ethical practices, including preventing child or forced labor and unsafe working conditions. Speak up if you suspect unethical or illegal practices.

WITH THE GOVERNMENT

UGI's operations are subject to extensive oversight from federal, state, and local regulatory agencies. We are committed to regulatory excellence and meet our obligations through integrity, transparency, and accountability. We require our Suppliers to do the same: follow the rules that relate to our government business; focus on safety, communicate properly, and compete fairly; never offer anything of value to government officials; properly conduct tests and inspections; and ensure that all representations and certifications you submit are accurate and truthful.



COMPETE FAIRLY

We believe in a free and open marketplace, where consumers have choices, and everyone may compete. Global trade laws help protect the global marketplace, but they can be complex and vary from country to country. We require our Suppliers to follow all applicable antitrust and competition laws. To avoid any conduct that could look like a violation, never agree – or appear to agree – with competitors to restrict trade, limit production, or boycott others and never discuss pricing, bidding, or costs with competitors. Be transparent, never deceptive.

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NEVER BRIBE

We do business with integrity and don't offer or accept bribes or ask anyone to bribe on our behalf. We expect our Suppliers to follow anti-corruption laws wherever we operate, including the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act 2010, and Sapin II. These laws carry serious penalties and apply to UGI's operations worldwide. Never offer, give, promise, or accept anything of value to win or keep business or gain an unfair advantage. When government officials are involved, our policy is simple: never bribe anyone, anywhere. This includes influence peddling and paying government contacts for special treatment. Never pay "facilitation" payments to government officials. Accurately document any offers given or received, and monitor your own Suppliers for improper activity.



WE ARE SECURE



PROTECT UGI ASSETS

As a part of our business relationship, we expect Suppliers to use any UGI assets responsibly and protect them from damage, misuse, and theft. That includes our physical assets, such as equipment, materials, facilities, vehicles, and inventory or technology assets like computer hardware and software, networks, and databases. Follow our policies to protect these assets and practice good physical security and cybersecurity. Maintain information security programs to address cybersecurity risks and protect information from unauthorized access, modification, or disclosure. If you are aware of any potential misuse of our assets or compromise of our systems or data, notify UGI immediately. Prompt notification is critical to containing risk and meeting applicable legal and regulatory reporting requirements.

SECURE CONFIDENTIAL INFORMATION AND IP

Information drives everything we do at UGI, so we collect, use, and handle it responsibly. We expect our Suppliers to safeguard all confidential information and intellectual property, including patents, trademarks, copyrights, trade secrets, and data belonging to our Company, employees, customers, and business partners. Honor our confidentiality agreement as spelled out in our agreement with you and follow protocols for record storage, legal holds, and disposal. Extend these same data protection and cybersecurity requirements to your own subcontractors and vendors, and be prepared to demonstrate their compliance upon request. If you suspect a potential breach of UGI data, let us know immediately to contain any damage.

MAINTAIN PRIVACY

We expect you to handle personal information with care and respect privacy. If you are entrusted with personal information, follow the guidance in our Data Processing Agreement (DPA) to safeguard it against unauthorized access, destruction, loss, alteration, or misuse. Collect only what is needed, use it only for business purposes, and never share it with anyone who isn't authorized. Use reasonable controls and encryption to prevent access by unintended recipients. Follow applicable data protection laws, observe security measures, and keep personal information only as long as necessary before securely deleting or anonymizing it. If you are aware of any breach, leak, or compromise of personal information, notify us immediately.

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USE AI RESPONSIBLY

At UGI, we use and develop AI transparently, fairly, and safely. Our Suppliers must do the same, ensuring that AI is used to help, not harm anyone. Use AI tools to support efficiency and good decision-making, but not replace it. Use human judgement and oversight with AI to stay in control of decisions and verify that any AI outputs are accurate, ethical, and aligned with UGI's policies. Only use approved AI tools and never put confidential UGI information or private data into public AI tools.



KEEP GOOD RECORDS

We believe accurate records build trust and help us make better decisions. Each of us contributes to our records, including our Suppliers. We expect you to be accurate, timely, and complete with every record entry and follow all applicable laws, regulations, guidelines, industry codes, and generally accepted accounting principles (GAAP). You must never alter, falsify, remove, or destroy any record or document related to UGI or our business or misrepresent facts or bypass our systems. Practice good records management by following retention tables and never improperly deleting records with legal holds. Speak up about any suspicious financial activity.



PREVENT FRAUD

UGI's success must come from hard work, never from deception or fraud. We rely on our Suppliers to make the same commitment, demonstrating complete honesty and transparency in every action. Stay alert for fraud, which occurs when someone deliberately tries to deceive someone to gain an unfair advantage. Suppliers must report any indicators of fraud, including unusual financial activity, missing or altered records, circumvention of controls or procedures, unauthorized transactions, or excessive expense claims. Maintain accurate records, disclose required information, cooperate fully with investigations, and never make false claims.

ENSURE BUSINESS CONTINUITY

Keeping our business running is critical. We must be prepared for any business disruption and rely on our Suppliers to help by creating, implementing, and regularly testing emergency response and disaster recovery plans. You must be able to notify and evacuate employees, protect data and intellectual property, and ensure the continuity of services you provide to UGI. Where applicable, your plans should address weather emergencies, natural disasters, infectious diseases, cybersecurity breaches, labor challenges, and system, power, telecommunications, or facilities outages.

WE ARE HONEST

AVOID CONFLICTS OF INTEREST

We act in UGI's best interests and avoid situations that may create conflicts. When interacting with us or on our behalf, our Suppliers must avoid any situation or relationship that interferes – or appears to interfere – with the decisions you make for UGI. Common examples include using your position for personal gain, supervising relatives or close friends, or serving on a board or committee that interferes with your obligations to UGI. If you, a close friend, or a relative have an appearance of a conflict, disclose it immediately to UGI for help in determining the appropriate course of action.

HANDLE GIFTS AND ENTERTAINMENT APPROPRIATELY

We are courteous in business at UGI, but we never offer or receive inappropriate offers. We also expect our Suppliers to avoid even the perception of an attempt to influence a decision or gain an advantage. Follow both UGI's and your organization's rules. Ensure offers are legal, nominal in value, infrequently offered, customary, and related to business. Business meals must be reasonable, and both the Supplier and the UGI employee must attend. Offers must not be lavish, illegal, inappropriate, or offered to an uninvolved person or a government employee. Never offer UGI employees anything of value when you are involved in procurement activities or during active bidding or negotiations. This includes, but is not limited to, paying for business meals.



PROTECT INSIDE INFORMATION

As our partner, you may be exposed to information about UGI or companies we do business with that is not publicly available (“inside” information) and could influence an investor to buy, sell, or hold stock or securities (“material” information). Trading on this information is “insider trading,” and it is illegal, as is passing the information to someone else so they may trade (“tipping”). We never trade or tip on material, inside information, and we expect our Suppliers to do the same. Do not trade on any publicly traded securities, including UGI’s, or share the information with those who don’t need it to do their job. If you are unsure whether information is material or whether you may act on it, contact UGI’s Integrity Helpline for guidance before you act.



FOLLOW TRADE LAWS

UGI does business around the world, following trade laws and acting with integrity. A variety of laws, regulations, and restrictions apply when we import or export products, services, information, or technology. We expect our Suppliers to know and follow these and all other requirements that apply to import and export activities, including the U.S. Foreign Corrupt Practices Act, the UK Bribery Act 2010, and Sapin II. Ensure transactions are accurate and have proper classifications, clearances, and documentation, and never involve boycotts or embargoed or sanctioned countries or entities. Suppliers may not pay facilitation payments or accept or request anything of value. Suppliers must also comply with all applicable sanctions, laws and regulations, including those administered by the U.S. Office of Foreign Assets Control (OFAC), and must not engage in transactions involving sanctioned countries, entities, or individuals.



WE ARE KIND

PROMOTE HUMAN RIGHTS

At UGI, we believe in preserving the dignity and freedom of every individual. We are careful to conduct our business in a way that respects human dignity and supports international efforts to promote and protect human rights. We follow applicable laws, rules, and regulations, along with the principles set forth by the International Labour Organization (ILO).

Our Suppliers must do the same and support international efforts to protect human rights, including an absolute opposition to modern slavery, forced labor, human trafficking, child labor, and physical punishment. Suppliers must ensure reasonable working hours, fair pay, and safe working conditions for all.

Suppliers must ensure that no goods or materials supplied to UGI are produced using forced labor. UGI complies with applicable forced labor import restrictions, and Suppliers must be prepared to provide documentation evidencing the origin of goods and materials if requested.

Suppliers must respect the rights of workers to freely associate, organize, and bargain collectively. Respect workers' rights to communicate openly with management or with each other about working conditions without fear of retaliation, harassment, intimidation, penalty, or interference. Choose your own Suppliers responsibly, monitor their work, watch for human rights abuses, and take corrective action when needed.



PROTECT OUR ENVIRONMENT

We do our part to support and protect the environment. Our Suppliers are expected to honor our commitment to sustainability and the responsible use of natural resources. Follow all applicable environmental laws, regulations, guidelines, and industry codes, including accurately reporting climate-related financial risks and greenhouse gas emissions and obtaining all required environmental permits, licenses, information registrations, and restrictions.

Look for other opportunities to be good environmental stewards in the way you operate. Work to prevent accidental or deliberate releases of hazardous materials, including wastewater, solid waste, and air emissions of volatile chemicals that could violate the law or harm the local community. If an incident occurs, such as leaks, spills, dumping, or discharging, notify the appropriate authorities immediately, as well as your UGI contact.

Suppliers should be aware that some of UGI's operations may be subject to various sustainability due diligence requirements, which require companies to identify and address human rights and environmental impacts throughout their value chains. We expect Suppliers to cooperate with our due diligence efforts and provide information necessary to support UGI's compliance obligations.

SOURCING ETHICALLY AND SUSTAINABLY

UGI performs risk-based due diligence when evaluating and engaging with Suppliers to make sure we deliver our products and services in an environmentally and socially responsible manner. Follow UGI's procurement and approval practices, source fairly and responsibly, and comply with the terms and conditions of all contracts. That includes sourcing only conflict-free minerals (tin, tantalum, tungsten, and gold), consistent with Dodd-Frank Section 1502 and the OECD Due Diligence Guidance, and providing origin documentation upon request. Work continually to improve labor standards, human rights, health and safety, ethics, and environmental stewardship in all you do. UGI values supplier diversity and encourages engagement with qualified small businesses, minority-owned, women-owned, and veteran-owned enterprises, and companies in distressed communities where opportunities exist.

If you work with us on government contracts, be aware that many contractual terms and conditions flow down to you. You must know, understand, and follow the laws and regulations pertaining to that work. When requested, Suppliers must provide sustainability-related information, such as environmental reporting, traceability data, or third-party verification.

UGI reserves the right to assess, audit, or request documentation from Suppliers to verify compliance with this Code, including in areas such as environmental performance, safety, human rights, ethics, and fair competition. If a Supplier does not meet our expectations, UGI may take corrective steps, such as education, warnings, or termination of contract.

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