



Anti-Harassment / Anti-Discrimination Policy



Definitions

| Term | Definition |
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| Company | UGI Corporation and each of its U.S. subsidiaries and affiliates. |
| Workplace | Company sites and facilities; also includes sites that are away from the office, such as work required to be performed at customer locations, work performed remotely, in Company vehicles, at off-site Company meetings, and at industry trade shows, conferences, and meetings. It may also include time spent traveling and socializing on the way to and from, while at, and times that are an extension of such events, e.g., dinner. This includes other settings in which employees may find themselves in connection with their employment. |

Anti-Harassment / Anti-Discrimination Policy

1.0 Purpose

One of the Company's core Values is Respect: we embrace the diversity and uniqueness of individuals and cultures and the varied perspectives they provide. Respecting our differences, cultivating diversity and engaging others with integrity and inclusion is a standard the Company embraces. We recognize that our success depends on the commitment and ability of our employees to create greater value for all. Consistent with this value, the Company's goal is to provide a workplace free of discrimination and harassment. Sexual or other harassment based upon race, color, religion, sex (including pregnancy, lactation, childbirth or related medical conditions), sexual orientation, gender identity, age (40 and over), national origin or ancestry, citizenship status, physical or mental disability, genetic information (including testing and characteristics), veteran status, uniformed service member status or any other status protected by federal, state or local law is prohibited.

This policy explains what harassment and discrimination are and how the Company will address concerns about harassment and discrimination.

2.0 Scope

This policy applies to UGI Corporation and each of its U.S. subsidiaries and affiliates (collectively, the "Company"). The Company will not tolerate harassment or discrimination of its employees by anyone, including managers, supervisors, co-workers, and non-employees. Non-employees may include customers, clients, visitors, contractors, consultants, leased or temporary workers, third-party vendors, or others working on Company property and/or with Company employees. If such harassment or discrimination occurs in the workplace by someone not employed by the Company, the procedures in this policy are to be followed.

Harassment and discrimination are prohibited at all times and in all locations. This includes customer and construction sites, off-site meetings, trade shows and conferences, while traveling and socializing on the way to and from workplace settings, or at related events such as meals, and any other setting in which work-related business is being conducted (whether during or after normal business hours).

These behaviors are also prohibited with electronic equipment. This includes Company-provided systems, including e-mail, voice mail, instant messaging, texting, video conferencing and the Internet, including through posts to social media, and personal electronic devices and systems used to communicate with other individuals.

3.0 Procedures

The Company will provide training about discrimination and harassment for our employees and will require employees to complete training upon hire and at least every two years or sooner as required by law.

3.1 Harassment

Harassment is a form of unlawful employment discrimination. It includes unwelcome conduct (verbal, physical or visual) that has the purpose or effect of interfering with someone's work performance or creates an intimidating, offensive or hostile work environment. Harassment based on a category protected by applicable law is unlawful and violates Company policy.

3.2 Sexual Harassment

Sexual harassment includes unwelcome or unwanted sexual advances, requests for sexual favors and other verbal, physical or visual conduct of a sexual nature or based upon someone's sex when:

- submission to the conduct is made, directly or indirectly, a term or condition of employment; or
- submission to or rejection of the conduct is used as the basis for employment decisions affecting the individual; or
- the conduct has the purpose or effect of unreasonably interfering with someone's work performance or creates an intimidating, offensive or hostile working environment.

This non-exhaustive list includes examples of conduct that may be sexual harassment:

- Physical assaults of a sexual nature (for example, rape, sexual battery, molestation or attempts to commit these assaults)
- Intentional physical conduct that is sexual, such as touching, pinching, patting, grabbing, poking, brushing against another employee's body, or impeding or blocking normal movements
- Repeated flirting or unwanted sexual advances or propositions (including repeated and unwelcome requests for dates)
- Demands for sexual favors in exchange for favorable or preferential treatment or continued employment, a promotion, or other employment benefits
- Visual conduct: Visual conduct: displaying or sending sexually suggestive objects or pictures, cartoons, calendars, posters, websites, emails or text messages, leering or making sexual gestures
- Continuing to ask an employee to socialize when the employee has indicated he/she is not interested or making or threatening reprisals after a negative response to sexual advances
- Negative comments about an employee's sex or sexual orientation
- Verbal Conduct: making or using sexually degrading commentary about an individual's body or dress, sexually suggestive or obscene letters, notes, invitations, emails, text messages, gossip, tweets or other social media postings, or sexually suggestive language, jokes, body language or gestures
- Retaliation for making reports or threatening to report sexual harassment.

3.3 Other Forms of Harassment

In addition to sexual harassment, the Company prohibits all other forms of harassment based on categories protected by applicable law. Examples of prohibited conduct include rude or insulting comments or threatening, intimidating or hostile acts that focus on a protected category, including jokes, pranks, taunting, epithets, derogatory comments or slurs based on an individual's protected status; or sending, receiving, or storing written or graphic material that shows anger or bias against a person or group because of a protected category, including derogatory posters, photographs, calendars, cartoons, drawings, websites, emails, text messages or gestures.

Prohibited harassment may also include behavior similar to the illustrations above pertaining to sexual harassment.

Employees should understand that intent does not matter when determining whether conduct is harassment. For example, an employee may think that he/she is being funny and working on team building by emailing inappropriate jokes. While that person did not intend to offend anyone, he/she still may have engaged in harassment. Just because someone does not immediately object to inappropriate behavior does not mean that the behavior is welcome.

3.4 Discrimination

It is a violation of Company policy to discriminate against another individual in the provision of employment opportunities, benefits or privileges. It is equally forbidden to create discriminatory work conditions; or to use discriminatory evaluative standards in employment if the basis of that discriminatory treatment is based, in whole or in part, on any legally-recognized status, including, but not limited to: race, color, religion, sex (including pregnancy, lactation, childbirth or related medical conditions), sexual orientation, gender identity, age (40 and over), national origin or ancestry, citizenship status, physical or mental disability, genetic information (including testing and characteristics), veteran status, uniformed service member status or any other status protected by federal, state or local law.

Discrimination of this kind is prohibited by a variety of federal, state and local laws, including Title VII of the Civil Rights Act of 1964, the Age Discrimination Act of 1967 and the Americans with Disabilities Act of 1990. This policy is intended to comply with the prohibitions stated in these anti-discrimination laws.

3.5 Consensual Relationships & Other Relationships in the Workplace

At times, romantic or dating relationships in the workplace may occur. An intimate relationship among employees can create an actual or at least potential or perceived conflict of interest in the employment setting, especially where one spouse, partner, or member of such a relationship supervises or has control over the work another spouse, partner, or member performs. To avoid this situation, the Company may refuse to hire or place an intimately associated individual in a position where the potential for favoritism or a

conflict exists.

The Company does not permit consensual relationships or other interpersonal relationships that may result in a perception of discrimination or favoritism between a supervisor or manager and someone in his/her reporting line. The Vice President(s) of the applicable Departments and the Vice President of Human Resources must jointly approve any exceptions. Any supervisor or manager involved in a relationship with another employee in his/her reporting line is required to report the relationship to the Human Resources department. Any supervisor or manager who becomes aware of this type of relationship is also required to report the relationship to Human Resources.

In other cases where a conflict or the danger of a conflict arises, even if there is no supervisory relationship involved, the parties may be separated by reassignment or terminated from employment, at the discretion of the Company.

Non-Fraternization

- Managerial personnel at the director level and above need to be aware that personal relationships with employees may be perceived as favoritism, misuse of authority, or potentially, sexual harassment, and may create quid-pro-quo situations.
- No person in a managerial role at the director level or above may engage in a prohibited behavior including dating, romantic involvement, and sexual relations, with another employee, regardless of the reporting relationship without approval by the Vice President of Human Resources.

3.6 Reporting Concerns about Discrimination or Harassment

If an employee believes that he/she, or someone else, has been discriminated against or harassed by a co-worker, supervisor, manager, client, visitor, vendor, contingent worker, customer or temporary, flex or seasonal worker of the Company, or who believes another individual has been subject to such conduct, the employee should immediately report the concern. Employees are encouraged to report concerns, even if they relate to incidents in the past, involve individuals who are no longer affiliated with the Company or concern conduct occurring outside of work if it impacts the individual at work. Complaints can be made verbally, or in writing. Employees may notify their supervisor or manager, or a member of Senior Management, Human Resources, or the Law or Compliance department. Employees are not required to report any prohibited conduct to a supervisor or manager who may be hostile, who has engaged in such conduct, who is a close associate of the person who has engaged in such conduct, or with whom the employee is uncomfortable discussing such matters. Employees also may use the Company's Integrity Helpline toll free, where employees may report concerns anonymously, if they choose, 24 hours/day:

- (866) 384-4272, or
- <https://UGIAmeriGasEthicsHelpline.tnwreports.com/>

Employees are encouraged, but not required, to communicate to the

offending person that the person's conduct is offensive and unwelcome. Any supervisor or manager who becomes aware of a concern about discrimination or harassment must immediately tell a member of Senior Management, Human Resources, or the Law or Compliance department. Supervisors or managers who allow discrimination, harassment, or retaliation to occur, including failing to immediately report the conduct, will be in violation of this policy and will be subject to appropriate action.

Employees should contact Human Resources, or the Law department or the UGI Compliance Group with questions about this policy and/or the process for raising and addressing concerns.

The Equal Employment Opportunity Commission ("EEOC") and equivalent state agencies will accept and investigate charges of unlawful discrimination and harassment at no charge to the complaining party. The nearest office of the EEOC and equivalent state agencies may be found in your local telephone directory or online at www.eeoc.gov.

3.7 Investigation of Reports

The Company will investigate all reports of conduct prohibited by this policy quickly, thoroughly, and fairly. The Company requires employees to fully cooperate in investigations. The steps the Company will take to review and address reported concerns might vary depending on the issues involved. The Company will maintain confidentiality to the extent possible and take reasonable steps to ensure that information is shared only with those people with a need to know. The Company also expects that employees will provide truthful information when participating in an investigation and, during the investigation, will keep matters related to the investigation confidential.

The Company will take appropriate action to address policy violations. The type(s) of action will depend upon the circumstances, and may include discipline, up to termination of employment.

Even if the Company finds that reported conduct does not violate this policy, the Company may take other measures to address workplace behavior inconsistent with Company values.

The investigation will be completed, and a determination made and communicated to the employee as soon as practical.

3.8 No Retaliation

The Company prohibits any form of retaliation for using the complaint procedure, reporting concerns about discrimination or harassment or testifying, assisting, or participating in an investigation, proceeding or hearing conducted by a governmental enforcement agency. Prohibited retaliation includes, but is not limited to, termination, demotion, suspension, failure to hire or consider for hire, failure to give equal consideration in making employment decisions, failure to make employment recommendations impartially, adversely affecting working conditions or otherwise denying any employment benefit.

Employees should immediately report any concern about retaliation to their supervisor or manager, a member of Senior Management, Human Resources, or the Company's Law or Compliance department, or through the Integrity Helpline. Any report of retaliatory conduct will be investigated in a thorough and objective manner. If a report of retaliation prohibited by this policy is substantiated, appropriate disciplinary action, up to and including termination of employment, will be taken. If a complaint cannot be substantiated, the Company may take appropriate action to reinforce its commitment to providing a work environment free from retaliation.

Retaliation is a serious violation of this policy and is unacceptable at UGI; the Company will take appropriate action to address retaliation in violation of this policy.

3.9 Good Faith

The initiation of a good faith complaint of harassment, discrimination or retaliation will not be grounds for disciplinary action, even if the allegations cannot be substantiated. Any individual who makes a complaint that is demonstrated to be intentionally false may be subject to discipline, up to and including termination of employment.

3.10 Supervisor/Manager's Responsibilities

All supervisors and managers are responsible for:

- Implementing this policy, which includes, but is not limited to, taking steps to prevent harassment and retaliation;
- Ensuring that all employees under their supervision have knowledge of and understand this policy;
- Promptly reporting any complaints to the designated Human Resources representative so they may be investigated and resolved in a timely manner;
- Taking and/or assisting in prompt and appropriate corrective action when necessary to ensure compliance with this policy; and
- Conducting themselves, at all times, in a manner consistent with this policy.

Failure to meet these responsibilities may lead to disciplinary action, up to and including termination of employment.

3.11 Training

The Company requires all employees to complete Anti-Harassment and Discrimination training at the time of hire and at least every two years or sooner as required by law. State specific training is required for supervisors and employees who work in those designated states, and will be provided in accordance with the requirements.

3.12 Support for Individuals Impacted by Harassment, Discrimination or Retaliation

The Company will strive to assist anyone who has been subjected to

unwelcome harassment, discrimination or retaliation to feel more comfortable in the work environment. Such assistance may, but does not necessarily include, transfer or reassignment. Any such assistance is at the Company's sole discretion.

Please contact your business unit's Human Resources department, the Law department, or the UGI Compliance Group for questions about this policy.