



Anti-Harassment / Anti-Discrimination Policy



Definitions

Term	Definition
Company	UGI Corporation and each of its U.S. subsidiaries and affiliates - UGI Utilities which includes UGI Gas Utility (GUD), UGI Electric Utility (EUD), UGI Penn Natural Gas (PNG), UGI Central Penn Gas (CPG); UGI Energy Services (UGIES), UGI Corporation; AmeriGas, UGI HVAC
Workplace	Company sites and facilities; also includes sites that are away from the office, such as work required to be performed at customer locations, 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. 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 or harassment. Sexual or other harassment based upon race, religion, color, creed, ancestry, national origin, sex, sexual orientation, gender identity, genetic information, age, veteran status, disability, or any other category protected by applicable law is prohibited.

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

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 of its employees by anyone, including managers, supervisors, co-workers, and non-employees. Non-employees may include contractors, consultants, leased or temporary workers, third party vendors, or others working on Company property and/or with Company employees.

Harassment is 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.

Harassment is also prohibited through the use of electronic equipment. This includes Company-provided systems, including e-mail, voice mail, instant messaging, and the Internet, and also personal electronic devices and systems.

It is prohibited to retaliate against an employee who reports concerns about harassment or participates in an investigation. If the Company finds that an employee did not act in good faith or falsified or omitted information in reporting a concern or in an investigation, the Company will take appropriate action.

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
- submission to or rejection of the conduct is used as the basis for employment decisions
- 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 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, or brushing against another employee's body
- Repeated flirting or advances
- Demands for sexual favors in exchange for favorable or preferential treatment or continued employment, a promotion, etc.
- Questions, comments or gossip about sexual activities, sex life or someone's body
- Sexually suggestive language, jokes, body language or gestures
- Displaying or sending sexually suggestive objects, pictures, posters, cartoons or other printed or visual items
- Whistling or staring
- Continuing to ask an employee to socialize when the employee has indicated he/she is not interested
- Negative comments about an employee's sex or sexual orientation

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 or pranks; or sending, receiving, or storing written or graphic material that shows anger or bias against a person or group because of a protected category.

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 Consensual Relationships

At times, romantic or dating relationships in the workplace may occur. The Company does not permit those relationships between a supervisor or manager and someone in his/her reporting line. Any exceptions must be approved by the business unit's Vice President, Human Resources. 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 tell Human Resources.

3.5 Reporting Concerns about Discrimination or Harassment

If an employee believes that he/she, or someone else, has been discriminated against or harassed, the employee should immediately report the concern. Employees may notify their supervisor or manager, or a member of senior management, Human Resources, or the Law or Compliance department. 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/>

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, the Law department or Compliance department with questions about this policy and/or the process for raising and addressing concerns.

3.6 Investigation of Reports

The Company will investigate all reports of conduct described in this policy quickly, thoroughly, and fairly. The Company expects employees to fully cooperate in investigations. The steps the Company will take to review and address reported concerns may 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 will take appropriate action to address policy violations. The type(s) of action will depend upon the circumstances. Employees who make a false report of a policy violation, or who provide false information (or fail to report relevant information) in an investigation, will be subject to appropriate action.

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.

3.7 No Retaliation

The Company prohibits any form of retaliation for reporting concerns about discrimination or harassment or participating in an investigation. 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. The Company will investigate claims of retaliation using the same procedures described above. Retaliation is a serious violation of this policy and will result in appropriate action.

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