

Air Products' Supplier Code of Conduct



Air Products is a world-leading industrial gases company in operation for over 80 years focused on serving energy, environmental, and emerging markets. The Company has **two pillars** in its growth strategy and sustainability is the foundation. Through our **core industrial gases business**, we supply customers in dozens of industries with critical products and expertise that lower emissions and increase efficiency and productivity. Through our **blue** and **green hydrogen megaprojects**, we will commit more than \$15 billion by 2027 to deliver clean hydrogen at scale, helping to drive the energy transition and move humanity forward.

More than 21,000 passionate, talented and committed employees from diverse backgrounds are driven by Air Products' higher purpose to create innovative solutions that benefit the environment, enhance sustainability and reimagine what's possible to address the challenges facing customers, communities, and the world.

Suppliers are an integral part of our team, enabling us to provide products and services to our customers and our sustainability initiatives. Air Products wants to do business with suppliers that share our values. This Supplier Code of Conduct ("Supplier Code") sets out the minimum expectations for our Suppliers covering business conduct, environmental protection and social responsibility.

Applicability

This Supplier Code applies to all suppliers – including their subsidiaries, affiliated entities and their suppliers and subcontractors – that do business with any company within the Air Products' group. In addition to the requirements outlined in this Supplier Code and our terms and conditions, suppliers are expected to:

- Implement systems and controls to enable compliance with all applicable laws and regulations
- Confirm conformance with this Supplier Code or demonstrate that suppliers have their own equivalent supplier code or policies in place
- Flow down these requirements or equivalent codes or policies to their suppliers and subcontractors
- Report suspected breaches of this Supplier Code to Air Products via Air Products' [IntegrityLine](#)
- Respond to Air Products' requests for information

Evaluation

Air Products reserves the right to evaluate alignment with this Supplier Code through questionnaires and/or audits.



Business Conduct

Integrity is a core value of Air Products as noted in our [Code of Conduct](#). Suppliers are expected to act with integrity and ethics, protect assets and ensure the accuracy of their books and records.

Integrity and Ethics

Suppliers are expected to:

- Comply with all applicable laws and regulations
- Avoid situations that involve or appear to involve conflicts of interest
- Not engage in any form of bribery or corruption, including the offering, promising, making, requesting, or accepting or agreeing to accept any payments favors, or anything of value that is or might be considered improper or illegal, including to/from government officials
- Refrain from providing extravagant gifts or hospitality which could influence, or appear to influence, an Air Products' employee's conduct or third parties doing business with Air Products
- Prohibit agreements or actions that may restrain trade or reduce competition and avoid discussing competitively sensitive information
- Comply with applicable laws governing international trade, including import/export laws, trade sanctions and embargoes
- Ensure goods and materials sold to Air Products do not contain prohibited materials, including minerals sourced from conflict areas

Asset Protection

Suppliers are expected to:

- Safeguard Air Products' intellectual property, including confidential and proprietary information
- Collect personal information only for legitimate business purposes, share it only with those who are allowed access, protect the data in accordance with applicable laws and regulations and retain the information only for as long as necessary

Suppliers are encouraged to:

- Consider and implement, as needed, programs to protect their company from cyber threat, especially those threats and risks that may impact Air Products

Accuracy of books and records

Suppliers are expected to:

- Ensure the accurate preparation and retention of all business records
- Record all financial transactions accurately and in a timely manner



Environmental Protection

Air Products is committed to industry leadership in environmental performance, compliance with all applicable laws and regulations and continual reduction of the environmental impact of our operations.

Suppliers are expected to:

- Comply with all applicable environmental laws and regulations
- Use natural resources responsibly, including energy and water, and consider the use of renewable resources
- Track and continually improve environmental performance of operations, products and services, considering factors such as energy and resource efficiency, greenhouse gas emissions, water consumption and waste generation
- Support Air Products' goals and programs related to energy, carbon dioxide reduction and water conservation

Suppliers are encouraged to:

- Publicly and proactively report on their environmental performance
- Develop new, competitive and sustainable offerings, particularly products that improve energy efficiency and reduce greenhouse gas emissions



Social Responsibility

Our goal is to be the safest, most diverse, and most profitable industrial gas company in the world. We strive to improve safety for our employees, customers, contractors and communities, as well as safeguard the human rights of our employees and in our business interactions. Our [Environmental, Health and Safety](#) and [Human Rights](#) policies reflect these commitments.

Health and Safety

Suppliers are expected to:

- Comply with all applicable health and safety laws and regulations
- Make safety a priority, including stopping work if a job is deemed unsafe
- Implement health and safety or similar policies and systems aimed at creating safe work environments, protecting employees and preventing accidents and incidents
- Follow Air Products' safety procedures when working at our facilities
- Track and continuously improve safety performance
- Maintain business continuity plans to mitigate exposure to human-caused and natural disasters

Suppliers are encouraged to:

- Publicly and proactively report on their safety performance



Social Responsibility (continued)

Human and Labor Rights

Suppliers are expected to:

- Comply with all applicable human rights-related laws and regulations
- Not discriminate in any manner on the basis of race, color, religion, national origin, age, citizenship, gender, marital status, pregnancy, sexual orientation, gender identity and expression, veteran status, physical or mental disability and other non-business-related factors
- Ensure respectful work environments free of any manner of physical and verbal harassment
- Not use or tolerate the use of slavery, human trafficking or forced or child labor of any kind
- Respect employees' rights to voluntary freedom of association and collective bargaining
- Provide compensation in compliance with all laws and offer fair wages, reasonable work hours and proper compensation for overtime

Suppliers are encouraged to:

- Develop and implement a human rights policy covering the above considerations
- Assess and address potential human rights risks in their operations and supply chains

Communities

For over 80 years, Air Products has been building relationships and contributing to the well-being of our host communities around the world.

Suppliers are encouraged to:

- Systematically evaluate the impacts of their activities on residents, including safety and environmental impacts
- Support the local communities in which they have operations and where their employees live and work

Diverse Suppliers

Air Products strives to provide maximum practical business opportunities to diverse suppliers. In the United States of America, we offer advice and guidance to assist minority business firms in building relationships and becoming successful suppliers to us.

Suppliers are encouraged to:

- Promote economic inclusion by selecting [small, disadvantaged and other diverse suppliers](#)

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For more information, please contact us at:

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