

Airgas Supplier Code of Conduct

In accordance with its code of conduct, Airgas expects that each of its suppliers, their parent companies, subsidiaries, and affiliated entities, as well as anyone who is in contact with Airgas, including their employees, sub-contractors, and other third parties, comply with the ethical principles of Airgas and ensure that this code of conduct is complied with by all of their employees and sub-contractors.

Compliance with international laws and regulations

Airgas's suppliers agree to comply without exception to all applicable national laws and international treaties concerning human rights, social rights, labor rights in accordance with the International Labor Organization, the control of exports, sanctions, in particular international sanctions imposed by the European Union, the United Nations, and the U.S., the control of certain raw materials,* and all applicable legislation pertaining to environmental protection.

**In particular, suppliers agree to identify the source and trace the chain of custody, insofar as this is possible, of certain minerals such as tantalum, tin, tungsten, and gold used in the manufacture of products supplied to Airgas. These control measures will be made available to Airgas on request.*

Child labor and forced labor

Airgas does not accept any practice on the part of its suppliers that is incompatible with the rights outlined in the Convention on the Rights of the Child (UN resolution of November 20, 1989). The age of admission to employment or the minimum working age may not be lower than the compulsory schooling age under applicable laws (generally 15 years of age, or 14 when permitted by local regulations). Additionally, all young workers must be protected against any work that is potentially dangerous, that could interfere with their education, or that could be harmful to their physical, mental, or social well-being.

Airgas expects its suppliers to forbid any and all forced labor and involuntary prison work. All work, including overtime, must be performed on a voluntary basis, and employees must be free to leave their jobs provided they give reasonable notice.

Health and safety in the workplace

Considering that all employees have the right to a safe and healthy work environment, free of the risk of violations to their personal integrity, Airgas's suppliers agree to enforce laws and regulations aimed at protecting the health and safety of their employees, and to ensure the safety of Airgas personnel at their facilities. Suppliers agree to put in place and maintain a workplace health and safety policy. In particular, each supplier agrees to track the number of lost time accidents and implement any and all measures aimed at reducing this number.

Non-discrimination and harassment prevention

In accordance with the Universal Declaration of Human Rights and its own ethical principles, Airgas expects its suppliers to offer their employees fair and equal treatment that respects their opportunities for recognition and career advancement irrespective of their origin, gender, beliefs or handicaps. In addition, they do not tolerate any form of discrimination whatsoever.

Harassment in any form, regardless of intent, whether direct or indirect, physical or verbal, is prohibited. Airgas expects its suppliers to guarantee that all of their employees are able to work in an environment where they are free from the risk of harassment.

Respect for the environment

Respect for the environment and the preservation of natural resources, in its own operations as well as those of its customers, is a major priority for Airgas. Accordingly, it is up to each supplier to contribute to the efforts and commitments of Airgas by complying with applicable environmental protection regulations. Consequently, Airgas's suppliers agree to preserve natural resources, structuring their activities so as to avoid or minimize negative environmental impacts by



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endeavoring to continuously improve their products and services with the goal of making them more environmentally friendly.

Airgas suppliers agree to measure, when appropriate, their atmospheric emissions of greenhouse gases, volatile organic compounds, aerosols, corrosive products, particles, and all chemical products that damage the ozone layer. Airgas suppliers agree to put an action plan in place aimed at reducing these emissions, lowering water and energy consumption and treating and reducing any chemical materials or other materials that present a risk to the environment. They also agree to reduce and recycle their solid and/or liquid waste.

Avoiding conflicts of interest

Airgas employees are expected to avoid any situation that involves a conflict between their personal interests and the interests of Airgas. Working simultaneously for a customer, supplier, or competitor could constitute a conflict of interest for an employee, as could directly or indirectly holding significant interests in such companies. Airgas expects its suppliers to respect these principles to the letter during their contact with its employees.

Preventing corruption

Airgas employees are prohibited from allocating, offering, or granting unwarranted advantages in any form, directly or through an intermediary, to a private individual or a representative of public policymakers in any country, for the purpose of obtaining favorable treatment or influencing the outcome of a negotiation involving Airgas.

Furthermore, no employee of Airgas may offer or accept any form of payment or remuneration to or from a supplier. Only those gifts, invitations, or benefits given to or received from a supplier whose sole aim is to strengthen their brand image and maintain good business relationships may be accepted. Their value must be nominal and consistent with customary business practices, and must not violate the laws or regulations of the country.

Airgas's suppliers agree to comply with these principles during their contacts with employees of Airgas as well as with their own sub-contractors.

Protecting information

Airgas requires its suppliers to respect the confidentiality and non-disclosure agreements in effect, and to properly protect and refrain from disclosing any strategic, financial, technical, or commercial data or documents communicated by Airgas and not in the public domain. Likewise, any nominative, professional or private information pertaining to individuals must be protected by all necessary precautions to prevent alteration or disclosure. The obligation of confidentiality also applies to information provided in confidence by the partners and customers of Airgas. This obligation of confidentiality remains in effect even in the event that business relations between the supplier and Airgas are terminated.

Suppliers may not make their involvement with Airgas public or use the brand Airgas without the prior written consent of Airgas. If consent is given, suppliers must comply with all related instructions and directions.

Protecting assets and resources

Airgas suppliers are responsible for protecting the assets and resources provided to them by Airgas, such as installations, equipment, and financial resources or cash. These assets and resources must be used in accordance with their business purpose and within the framework, established by Airgas. They may not be used for other purposes without the prior consent of Airgas. It is up to each supplier to protect the assets and resources of Airgas against any and all deterioration, fraud, loss, or theft.

More specifically, Airgas requires each of its suppliers to respect all national laws and international treaties in force pertaining to intellectual property and to respect the intellectual property rights of Airgas and third parties.

Compliance with competition law



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Airgas requires all of its suppliers to adhere strictly to the fair trade/competition laws applicable in the countries in which they operate. As a general rule, these laws forbid understandings or maneuvers that could limit or distort competition or trade. In particular, price-fixing agreements, the manipulation of tender processes, collusion with respect to markets, territories or clients between competitors, as well as the boycotting or unequal treatment of certain clients or suppliers without valid cause. The exchange or disclosure of sensitive business information concerning competitors, clients, or suppliers is forbidden.

Access to information Verification

During tender, qualification, or performance evaluation procedures, Airgas reserves the right to verify compliance with the rules set forth in this code of conduct with each supplier in any form it chooses: a questionnaire or an audit by Airgas or a third party. Airgas expects its suppliers to provide complete and accurate information, including access to their documentation, notably financial documentation. In addition, Airgas expects its suppliers to disclose any restrictions that may be imposed on the export or re-export of their supplies of products or services.