



Kosan Gas Norge AS: Account on the Transparency Act

1. About Us

Kosan Gas Norge AS sells and distributes LPG (Liquefied Petroleum Gas) in bulk to industrial businesses and residential gas consumers in the Norwegian market. The company's headquarters are in Oslo. It is a wholly owned subsidiary of Kosan Gas Danmark A/S, which is part of the consolidated financial statements of UGI Corporation, Pennsylvania, USA.

Kosan Gas operates as a matrix organization where responsibilities are distributed across companies in different countries. Kosan Gas Norge AS has four employees who serve the Norwegian market. Kosan Gas Norge AS is subject to UGI Group's Code of Conduct, which outlines the group's expectations regarding the responsibilities of all employees in UGI companies, as well as suppliers and business partners, concerning personal conduct in the workplace and in society. All employees in Norway have received training on the guidelines, including information about UGI's whistleblowing channel. The parent company in the USA is responsible for compliance with UGI's Code of Conduct.

The guidelines are available in multiple languages. Here is a link to the Norwegian translation:

UGI Code of Conduct (Norwegian):

<https://www.ugicorp.com/static-files/3e2c4709-e17f-446c-8b89-99448be07fa7>

2. Working conditions in Kosan Gas Norge AS

The working conditions for the four office employees in Norway (two women and two men) are of low potential risk. The company carries out competence development for both employees and suppliers to minimize the risk of injuries. The fact that there have been no recorded serious work accidents or injuries, nor any registered sick leave in 2024, is a strong indication that the working conditions are satisfactory.

3. Our Supply Chain

UGI's Supplier Code of Business Conduct and Ethics outlines our expectations for responsible conduct, good working conditions, and respect for human rights from our suppliers. An Integrity Helpline has been established, which can be used to ask questions regarding UGI's expectations or to report concerns and negative findings.

UGI Supplier Code of Conduct:

www.ugicorp.com/static-files/74d8a873-dd07-4858-b40b-23aa836213f0

Integrity Helpline:

<https://secure.ethicspoint.com/domain/media/en/gui/69431/index.html>

We assess the risk of human rights violations and substandard working conditions in our supply chain by categorizing the types of products and services we procure, the country of production,



whether the suppliers are subject to the Transparency Act, and our own evaluation and knowledge of the supplier.

For those suppliers deemed high risk within this assessment process we endeavour to conduct further investigations at the onboarding stage. This review includes an understanding of their processes supporting Data Privacy regulations and cyber security provisions where applicable. As far as possible we ensure that all suppliers agree to Kosan Gas terms of business which includes a provision relating to our supplier's code of conduct expectations incorporating modern slavery, bribery & corruption, and financial integrity. We also ensure that we have the ability as necessary to perform ongoing audits relating to operational safety and financial integrity enabling us to evaluate their diligence.

Our strategy is to engage in dialogue and contribute to positive change. However, if suppliers fail to respond, or do not demonstrate a willingness to implement necessary measures, we will reconsider our cooperation.

Findings from our Due Diligence Assessments

Actual Negative Impacts

We have not identified any actual negative impacts among our suppliers during the reporting year.

Significant Risks of Negative Impacts

Our most critical procurement category is LPG. Working conditions in the oil and gas industry are potentially associated with high OHS risks. Our supplier in Norway is subject to the Transparency Act, and how they manage this risk is something we will address in our dialogue with them. Another key procurement category is transportation services. The transport industry is a sector where violations of labour laws are relatively frequently reported. We will engage with our suppliers to understand how they manage these risks. Cleaning services are also associated with high potential risk, even in Norway. Our cleaning services supplier is approved by the Norwegian Labor Inspection Authority.

4. Actions and Measures

In the upcoming year, we will:

- Conduct thorough reviews with our transportation partners to assess and verify their driver welfare practices and working conditions.
- Follow up with our LPG supplier to examine how they manage OHS risks related to LPG production.



Expected Results

We expect that our dialogue with suppliers will increase their awareness of our expectations and provide us with better insight into how they monitor and improve working conditions within their own operations and supply chains.

Oslo, June 2025

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Megan Mattern
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