

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 five 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 five office employees in Norway (two women and three 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 2025, 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 suppliers with the highest risk, or those we have the least knowledge about, we conduct further investigations. This includes examining how they manage risks within their own operations, whether they are covered by the Transparency Act, and evaluating their descriptions of due diligence efforts within their own business and supply chain.

We document our dialogue and set clear deadlines for follow-up.

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. How our suppliers manage this risk is something we will address in our dialogue with them. Norwegian suppliers are subject to the Transparency Act, and we find their account on the Transparency Act satisfactory.

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 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 coming year, we will:

- Continue to follow up with transportation service providers to investigate how they ensure good working conditions for drivers. This has been followed up with the transport company during our monthly meetings. The transport company produce yearly ESG rapport there they have a part dedicated to “ Work Quality and Human Rights”. Kosan Gas conducts two separate meetings with all drivers on a yearly basis where OHS risks and incidents that have taken place are discussed to understand how to prevent this to happen in the future
- Follow up with our LPG supplier to examine how they manage OHS risks related to LPG production. Our main suppliers of LPG have ESG reports and Code of conduct which is in line with Kosan Gas own principals.

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. Through meetings and training sessions with drivers, as described above, we gain good insight to how the supplier is promoting good and safe working conditions within their own operations.

Oslo 26 June 2026




Robert Drury
Chairman

Caroline Francke Berg
CEO and Board member

Julie Fazio Vanderborght
Board member

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Signers


Caroline Francke Berg
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Robert Drury
a99433a0-3b73-4d2c-8e65-e5cf97bf36f8 2026-06-26 07:35:13Z
Julie Fazio
adad4c56-2a6d-4622-9f8f-40559d9093f2 2026-06-26 08:49:47Z

Documents in the transaction

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