



## Modern Slavery and Human Trafficking Statement

This statement relates to the financial year ending 31 September 2020 and is made by AvantiGas Limited and AvantiGas On Ltd. and its relevant subsidiaries in compliance with the Modern Slavery Act 2015.

### INTRODUCTION

Safety, integrity and respect are core values of our Company and they guide our business practices, both internally and with our external partners. We are committed to ensuring that all our employees, workers and contractors are treated fairly and equally, and operate in safe and inclusive working condition; we also ensure that their human rights are respected. We believe that all individuals are entitled to honest, courteous and fair treatment, hence our commitment to safeguard the rights of individuals and mitigate any risk of slavery and human trafficking.

### OUR BUSINESS

AvantiGas is a leading supplier delivering clean and efficient LPG and energy solutions across England, Scotland and Wales. We offer a range of energy products and service solutions including off-grid LPG bulk gas, LPG Gas Bottles, Aerosol Propellant, Biomass Renewables, and we recently launched our on-grid Mains Gas division for business customers.

We are part of UGI Corporation ("UGI"), a holding company that, through subsidiaries, distributes, stores, transports and markets energy products and related services in the U.S., and across many European countries under UGI International. AvantiGas serves business and residential customers from all sectors and walks of life, providing a professional and safe service via our network of multiple distribution centres, two in-land gas terminals and our UK-based emergency call centre that delivers 24/7 maintenance, service and aftercare.

### OUR VISION AND VALUES

We believe that safe, reliable, and efficient energy is a necessity for our customers and communities. We strive to deliver this fundamental need through best-in-class safety, operations, products, and services while positively impacting the lives of our employees, customers, and the communities we serve. We do this by committing to our Values, as described below.

#### Our Values:

- Safety – Safety is a way of life for us. We take the time to be safe, safeguard one another, and make safety a priority in our interactions with our colleagues, customers, and communities.
- Integrity – We do the right thing and act with honesty. We are ethical and trustworthy in all of our relationships.
- 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 capability of our employees to create greater value for all.

- Responsibility – We are committed to sustainable business practices and growing the Company in an environmentally responsible way. Natural gas and LPG are clean-burning, efficient, cost effective, and abundantly available energy sources. We pursue innovative and efficient energy solutions to benefit our customers and our communities.
- Reliability – We are a reliable service provider with a long-standing history of active involvement in the community. We recognize that our customers rely on our products and services. In turn, we support the communities we serve by our investments in critical infrastructure and our team’s commitment to philanthropic efforts.
- Excellence – We are committed to achieving exceptional performance through disciplined growth, execution, and continuous improvement. Our goal is to deliver the best value for investors as a high performing investment, for customers as a best-in-class service provider, for employees as a great place to work, and for communities as a valued neighbour.

As an organization, we honour Human Rights and we are committed to treating all people with respect and dignity.

### **OUR CODE AND POLICIES**

Our organization sets expectations for how its business shall conduct their activities, and our employees, suppliers and contractors are expected to work in accordance with the ethical standards set forth in our Code of Conduct; they are also required to comply with all relevant laws and regulations. Our organization’s Code of Conduct applies to all employees including Board members and reflects our commitment to acting ethically and lawfully in any area and place we operate.

In the past fiscal year, we launched a new Code of Business Conduct and Ethics, which reflects who we are as an organization and what we believe in. The Code reiterates our Company’s Values, and describes our expectations for employees, managers, and third parties. It is more user-friendly by design and more practical with features such as life-based scenarios and tips and a list of useful resources. Finally, our new Code addresses risk areas that were not previously expressly treated, such as the modern slavery and human trafficking. Our new Code could be found [here](#).

We train our employees on all aspects of the Code, to raise awareness and ensure our people know what is expected of them. We also have a disciplinary process in place for those employees that deliberately break the rules set forth in our Code of Conduct, which ensure that these issues and/or unacceptable conduct is handled appropriately.

In addition, we have a dedicated Policy on anti-slavery and human trafficking, which further clarifies the principles needed to comply with the Modern Slavery Act 2015 and other relevant anti-slavery laws and regulations, and underlines our commitment to transparency in our supply chains. It provides our employees, contractors and other business partners, guidance on slavery and human trafficking, as well as summarizing the measures taken by the organization to tackle slavery and human trafficking in our business to ensure slavery and human trafficking is not taking place in our supply chains.

Our employees are encouraged to report any suspected breaches of our Code of Conduct and supporting policies, or any other misconduct through various means, including our Integrity Helpline reporting system that is available by phone or website 24/7. We do not tolerate any retaliation or other discriminatory behaviour against employees for reporting suspected violations in good faith.

### **SUPPLY CHAIN RISK ASSESSMENT AND MITIGATION MEASURES**

We conduct our business in a manner that respects the human rights and dignity of all, and we support international efforts to promote and protect human rights, including an absolute opposition to slavery and human trafficking, child labour, and forced labour. We never knowingly do business with any individual or company that violates employment laws or engages in human rights abuses. We also expect our suppliers to source responsibly, monitor their suppliers and, where needed, require corrective action.

To underline our commitment to tackle any forms of misconduct in our supply chain, this past year we have also developed a dedicated UGI Supplier Code of Business Conduct and Ethics. This document describes the expectations that we have towards all third parties that we do business with and includes provisions about honouring human rights and sourcing ethically and sustainably. Our new Supplier Code can be found [here](#).

In addition, to reduce the risk of slavery and human trafficking in our supply chain, we perform an assessment of our third parties based upon a number of factors, including but not limited to their location, cumulative spending, and the type of services or products provided. Relevant suppliers are then required to successfully complete our anti-slavery due diligence review and agree to specific contractual clauses.

**TRAINING**

Since the deployment of our new Code of Conduct, we have conducted a series of trainings for our Leadership and management teams about the Code, underlining – among others – the importance of work safety, diversity and inclusion, fair and equal treatment and respect of human rights which includes a firm prohibition of any type of modern slavery and forced labor. However, to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we are planning to implement a specially designated training to our relevant staff.

**OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING**

We are committed to improving our understanding and management of slavery and human trafficking risks over time. In following years, we will measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains by conducting an internal review and comparing the figures with past years.



Beth Reid, Vice President  
UGI International Region North