



California Supply Chains Act Disclosure

Airgas, Inc. and its subsidiaries are strongly committed to the highest standards of ethical and socially responsible conduct in every aspect of our business, including strict compliance with laws and regulations relating to human trafficking and slavery.

Verification

Airgas maintains a Supplier Code of Conduct, which, among other things, states: “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). . . . 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.”

Certification

With those suppliers Airgas has recent executed contracts with, we require that suppliers: (1) agree to comply with the Supplier Code of Conduct and all applicable laws and regulations, including applicable labor laws and regulations, in all aspects of their performance of work on our behalf (including the manufacture, transportation, and delivery of their goods) and (2) certify that their products are, and will at all times, remain in compliance with all applicable laws, including applicable labor laws and regulations.

Audit

The Supplier Code of Conduct requires suppliers to verify compliance with its requirements at any time we request and in any form we choose. We can conduct audits of our suppliers, both with prior notice and without, using internal resources to verify compliance with contractual requirements. In addition, in the future a select number of suppliers will be identified each year to undergo an audit conducted by a third-party to assess and rate the supplier’s performance relative to the Supplier Code of Conduct.

Internal Accountability

In addition to the requirements we impose on our suppliers, we also require all employees to abide by a Code of Conduct as a condition of their employment, which states, “All employees, officers and directors of the Company should respect and comply with all of the laws, rules and regulations of the U.S. and other countries, and the states, counties, cities and other jurisdictions, in which the Company conducts its business, or the laws, rules and regulations that are applicable to the Company.” We provide company employees both internal and third-party avenues to confidentially and, if desired, anonymously report violations of the Code of Conduct. Employees violating the Code of Conduct are subject to disciplinary action, up to and including termination.

Training

Our employees are trained annually on the requirements of the Code of Conduct and the available avenues to report violations, including the option to report anonymously to a third-party.

In addition, supply chain management personnel regularly undergo specialized procurement training on all company policies, practices, and procedures, including the Supplier Code of Conduct. They are trained to ensure that appropriate clauses are included in all of our agreements with suppliers, including those that require suppliers to comply with all laws and the Supplier Code of Conduct.