

Ethics and Integrity

Position Statement



Background	A company's success is built on the trust of its employees, customers, communities, and other stakeholders where it operates. Acting ethically and with integrity builds trust and positively impacts reputations, relationships, and performance.
Approach	<p>Integrity and our Code of Conduct</p> <ul style="list-style-type: none">• Integrity is a core value at Air Products. We do not tolerate ethics violations and have strong policies and programs in place to prevent, detect, report, and address these issues. This includes Air Products' Code of Conduct and Business Ethics (Code of Conduct).• The Code of Conduct applies to all full and part-time Company employees at all operations worldwide, the Company's Board of Directors, and our subsidiaries, affiliates, operating units, and divisions worldwide. Every full and part-time employee is required to comply with the Code of Conduct, complete mandatory training, and annually certify understanding of the Code of Conduct as a condition of employment.• We expect our agents, consultants, contractors, distributors, joint venture partners, and other third parties with whom we have business relationships to adhere to these standards, as well.• The Code of Conduct is managed by Air Products' Law Department and periodically reviewed and updated. It covers many aspects of ethical business practices, including but not limited to conflicts of interest, bribery and corruption, financial accounting and reporting accuracy, fair dealing, political contributions and lobbying, equal opportunity and prevention of harassment, and environmental, health, and safety.• Supporting the Code of Conduct is a series of internal governance policies, procedures, standards, and guidelines aligned with the elements of the Code. <p>Risk management</p> <ul style="list-style-type: none">• The Company conducts periodic reviews and testing to ensure continuing effectiveness of compliance programs/controls. Global processes have been established for identified significant risks based on the nature of our business. These include relationships and transactions with governmental authorities and the use of third-party intermediaries. <p>Reporting and investigations</p> <ul style="list-style-type: none">• Air Products encourages individuals to report, as allowed by local law, misconduct or ethics violations. Our IntegrityLine provides a web-based reporting capability as well as a toll-free telephone-based service for anyone who would like to report a potential issue. Air Products upholds a firm promise of non-retaliation for those who, in good faith, report violations or suspected violations.

	<ul style="list-style-type: none"> • Every allegation is reviewed and investigated as needed through a case management system managed by our Global Asset Protection Director. The Director also leads the Company’s Investigation Council which is comprised of representatives from key functions and applicable regions. • The Company has deployed a Disciplinary Decision-Making Process for addressing allegations that have been confirmed. This process includes, as warranted, employee termination, the pressing of criminal charges, and internal communications about who was involved, what happened, and the disciplinary steps taken. These regular communications provide an opportunity for the Company to reinforce that improper behavior will not be tolerated and encourage employees to actively report any concerns.
<p>Commitments</p>	<p>Ongoing commitments</p> <ul style="list-style-type: none"> • Air Products will continue to: <ul style="list-style-type: none"> ○ Require all employees to complete the Annual Code of Conduct Training and Certification module to certify understanding and compliance with Air Products’ Code of Conduct and related policies, standards, and guidelines. ○ Publicly report on our programs and performance related to ethics and integrity as we have since 2007.
<p>Administration</p>	<ul style="list-style-type: none"> • Air Products’ management routinely evaluates our sustainability commitments and progress. The Corporate Governance and Nominating Committee of Air Products’ Board of Directors has oversight responsibility over public policy issues, including sustainability, and the full Board has oversight responsibility for our environmental, health and safety performance.¹ • Air Products’ Sustainability Leadership Council routinely reviews our sustainability programs, position statements, performance, and reporting. • We report on our sustainability commitments and progress in our annual Sustainability Report as well as through other external communications channels, including our website and social media. • This position statement and related statements and policies are maintained on Air Products’ public website.

¹See our most recent [Proxy statement](#) for responsibilities of the Board of Directors.