

COMPRESSED GAS ASSOCIATION, INC.
FOREIGN CORRUPT PRACTICES ACT COMPLIANCE GUIDELINES

It is the policy of the Compressed Gas Association, Inc. ("CGA") to conduct its operations in strict compliance with the U.S. Foreign Corrupt Practices Act of 1977, as amended (the "FCPA"), and all applicable anti-corruption laws of other nations. No CGA activities shall create even the appearance of a violation of the letter or spirit of these laws.

Pursuant to this Policy, CGA, its officers, directors, employees, agents, and members acting on behalf of CGA anywhere in the world are prohibited from corruptly paying, giving, authorizing, offering or promising to give, directly or indirectly through a third party, anything of value to any "foreign official" (as defined below) to obtain or retain business, direct business to any person or gain any other improper business advantage.

For purposes of this Policy, a "foreign official" means any officer or employee of a foreign government or instrumentality thereof, or of a public international organization (such as the European Union or World Bank); any person acting in an official capacity for or on behalf of a foreign government, governmental instrumentality or public international organization; any foreign political party or party official; or any candidate for foreign political office. Thus, "foreign officials" include not only elected officials, but also anyone acting under a delegation of authority from a foreign government to carry out government responsibilities, officers and employees of companies or entities owned or controlled by foreign governments (such as state-owned commercial enterprises and government-controlled universities), and others. "Anything of value" includes not only cash and cash equivalents, but also gifts, entertainment, travel expenses, political contributions, investment opportunities, and anything else of tangible or intangible value.

The following two narrow categories of payments are not covered by the FCPA and thus may be permissible under this Policy, but only if they are (a) authorized in advance and in writing by CGA's President and Chief Executive Officer, and (b) accurately recorded in CGA's books and records:

1. *Reasonable and Bona Fide Expenses.* Payments of reasonable and *bona fide* expenses incurred by or on behalf of a government official that are directly related to the promotion, demonstration or explanation of products or services or the execution or performance of a contract with a government may be permissible.
2. *Local Written Law:* Payments that are lawful under the written laws and regulations of the official's country are permissible. However, bribery of government officials is illegal in every country in the world, so this exception will rarely, if ever, apply.

Although the FCPA also contains a limited exception for facilitating or expediting payments to foreign officials for purposes of securing routine, non-discretionary government action, such payments are prohibited by law in many other countries. Accordingly, this Policy prohibits the making of facilitating payments, except where a threat to personal health and safety exists.

It is important to note that this Policy does not prohibit the provision of free copies or online access to obtain free copies of any CGA standards or publications to a foreign official for the purpose of promoting safety and/or promoting the adoption of CGA safety standards by any government, rather than for the improper purpose of obtaining or keeping business or securing an improper business advantage.

The consequences of failing to comply with the FCPA and other applicable anti-corruption laws are serious. FCPA violations can result in severe civil and criminal penalties against a company and can subject an individual to prosecution, imprisonment, and substantial fines which will not be reimbursed by CGA. For reference, the full text of the FCPA is available on the US Department of Justice website at: <http://www.justice.gov/criminal/fraud/fcpa/docs/fcpa-english.pdf>.