

SOUTHWESTERN ENERGY COMPANY HUMAN RIGHTS POLICY

Southwestern Energy Company and its subsidiaries (collectively, SWN) are committed to the recognition and safeguarding of human rights when we have responsibility or control, wherever we operate. SWN complies with all applicable national and local laws and international treaties concerning human rights, social rights and labor rights, consistent with the principles of the Universal Declaration of Human Rights, and referenced elements of the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. At the same time SWN respects the sovereignty of nations and their political subdivisions and affirm their primary responsibility to protect the human rights of all living within their borders.

This policy reflects SWN's [Code of Business Conduct](#) and its [Formula](#). SWN expects its vendors and contractors and others with whom it deals to share the same commitment to human rights that SWN has.

All SWN employees are responsible for complying with this policy, which is publicly available on the SWN website and communicated internally and externally to all employees, vendors, suppliers and other relevant parties. Management will promote employee understanding of this policy and applicable laws related to it and regularly monitor compliance. SWN takes these standards very seriously. Non-compliance, depending upon the circumstances, may result in serious disciplinary action up to and including termination of employment.

Compensation

SWN will pay employees a wage meeting or exceeding the minimum wages and overtime rates required by law and any applicable collective labor agreements. If no such laws or agreements apply, wages will be in line with marketplace practices and sufficient to meet basic needs. SWN will not discriminate in remuneration on any basis covered by its policies on [Equal Employment Opportunity](#) and [Harassment and Discrimination](#).

Prevention of Discrimination and Harassment

As discussed in more detail in SWN's policies on [Equal Employment Opportunity](#) and [Harassment and Discrimination](#), sound relationships among SWN employees are essential to achieving and maintaining productivity and a high level of business conduct. Basic to these relationships is SWN's recognition of the personal value of every employee and belief that every person should be treated fairly and with respect and that every employment-related decision should be based on an individual's merits and qualifications for a particular job, including capability, performance and reflection of our corporate mission and values. All decisions regarding recruiting, hiring, training, evaluation, assignment, advancement and termination of employment will be made without unlawful discrimination on the basis of race, color, national origin, ancestry, citizenship, sex, sexual orientation, gender identity or expression, religion, age, pregnancy, disability, present military status or veteran status, genetic information, marital status or any other factor that the law protects from employment discrimination. SWN also forbids harassment or

intimidation on any of these bases. SWN could never list all unacceptable bases for discrimination, harassment and intimidation, and in employment matters as with all other matters, SWN always turns to a key element of its [Formula](#)—“Doing the Right Thing.”

SWN will not tolerate any form of harassment, discrimination or retaliation in the workplace against any of its employees or contractors by anyone, including but not limited to officers, supervisors, employees and non-employees of SWN. Any form of harassment, discrimination or retaliation directed at any SWN employee is strictly prohibited as a matter of SWN company policy, and may also violate law.

Any individual who is a victim of harassment, discrimination and/or retaliation in the SWN workplace should immediately report such conduct. All such reports and subsequent investigations will be handled in as confidential a manner as is reasonably possible, consistent with SWN’s obligations under local, state and federal law as well as any applicable company policies and internal procedures of SWN.

Health and Safety

In accordance with SWN’s [Health, Safety and Environmental Policy](#), SWN’s safety goal is zero incidents and zero injuries. SWN believes that all injuries are preventable. Employees are empowered and expected to stop or refuse to perform a job if it is not safe or cannot be performed safely. All employees and onsite contractors are required to comply with SWN’s health, safety and environmental policies.

SWN will provide appropriate access to a safe and hygienic work environment, including safe water, sanitation and hygiene for all employees and contractors in premises under SWN’s control. Housing or other accommodation, where provided to workers, must be clean and safe. SWN also will establish maximum working hours as required to assure safety and health.

SWN provides appropriate security to protect our personnel and assets. Security vendors will be trained and, where applicable, licensed. They will be instructed to use force only when necessary.

Freedom of Association

SWN listens to its employees and believes it has good relations with them. Although SWN does not believe its employees need an intermediary organization between them and the company, it acknowledges that our employees have the right to choose which, if any, organizations they join, including to determine whether to bargain collectively in accordance with applicable law.

Prohibition of Child or Forced Labor and Human Trafficking

SWN opposes the use of all forms of child, compulsory or forced labor or human trafficking at our operations and expects our vendors and contractors to demonstrate similar intolerance for such practices. SWN will abide by, and require all of its vendors and contractors to abide by, all applicable laws in these areas. “Forced” labor includes labor

as defined by the ILO Convention 29 on Forced Labour and ILO Convention 105 on Abolition of Forced Labour and includes labor exacted by an employer through the use of coercion, including withholding food or land or wages, physical violence, corporal punishment or sexual abuse, restricting peoples' movements or locking them up, and debt bondage. The term "child" is consistent with the ILO Convention 138 on Minimum Age and the ILO Convention 182: Worst Forms of Child Labor.

Indigenous Peoples

SWN will be sensitive to the history, culture and customs of indigenous peoples in areas where it operates and, consistent with applicable law, is committed to consulting with appropriate representatives when its activities might affect culturally important areas.

Communities

SWN seeks to have a positive impact and generate economic opportunities in the areas where it operates. Through proactive, open dialogue with residents and community leaders, SWN will seek to understand and respond as appropriate to community concerns. SWN aims to have a positive impact by hiring qualified local personnel, operating responsibly and supporting local health, environmental, education, emergency response and family-focused programs.

SWN's activities rarely, if ever, involve resettling individuals. In those unusual cases, SWN is committed to providing appropriate remuneration in accordance with applicable law and equitable principles.

Complaint Procedure and Implementation

SWN is committed to monitoring, minimizing and reporting on the human rights impacts of its activities and rectifying material adverse impacts in accordance with law.

Employees who believe they have discovered or been subjected to actions that are inconsistent with this policy should report this to their management, Human Resources or SWN's [Confidential Complaint Procedure](#).

The Chief Compliance Officer has overall responsibility for the administration of this policy and SWN's [Code of Business Conduct](#) and ensuring appropriate follow-through of reported violations.

Human Resources and supervisors/managers at all levels are responsible for upholding the labor elements of this policy, supporting the Company's efforts to create a respectful, and fair work environment, modeling their behavior accordingly and reporting non-compliance with those elements of this policy. Supervisors/managers at all levels are responsible for upholding the safety elements of this policy, supporting SWN's efforts to maintain a safe work environment, modeling their behavior accordingly and reporting non-compliance with those elements of this policy.

Suppliers, vendors and contractors must agree to abide by SWN's policies related to human rights, health, safety and the environment or demonstrate a commitment to these principles via their own policies.

Third party reports may be made through SWN's [Confidential Complaint Procedure](#).

SWN prohibits any form of retaliation against any individual for reporting what the individual in good faith believes to be non-compliance with this policy.

APPROVED

Bill Way, President and Chief Executive Officer
August 27, 2019