

CONFIDENTIAL COMPLAINT PROCEDURE

The Company has established procedures for (1) the receipt, retention and treatment of complaints regarding unethical, illegal or unsafe activities and (2) the confidential, anonymous submission by employees or other interested parties of concerns regarding questionable activities. These procedures are designed to facilitate the reporting of concerns or complaints. The following is a description of the confidential complaint procedure established by the Company:

1. Receipt of Complaints

- a. Employees and other interested parties may report their concerns or complaints via the following three methods:

- Report their concerns or complaints to the Corporate Compliance Officer on a confidential, anonymous basis by submitting their concern or complaint in writing and forward it in a sealed envelope by regular U.S. mail addressed as follows:

Southwestern Energy Company
Attn: Chief Compliance Officer
P.O. Box 12359
Spring, Texas 77391-2359

- Report their concerns or complaints on a confidential basis by calling the independent reporting company that Southwestern has engaged for those who want to speak up. This service is available at **1-877-516-3496**, 24 hours a day, 7 days a week and allows you to voice your concerns without fear of retaliation. This independent company, EthicsPoint, also provides a secure, web-based reporting system, which can be accessed through the Corporate Services and Quick Links on SWNet, <https://www.swn.ethicspoint.com>.

- Contacting the Board of Directors

1. In writing and forward it in a sealed envelope by regular U.S. mail addressed as follows:

Board of Directors c/o Corporate Secretary
Southwestern Energy Company
P.O. Box 12359
Spring, Texas 77391-2359

2. Concerns may be communicated anonymously to Non-Employee Directors or the Audit Committee by contacting EthicPoint at **1-877-516-3496** or <https://www.swn.ethicspoint.com> and selecting/requesting the option.

- b. Employees and other interested parties are encouraged to provide as much specific information regarding the concern or complaint as is possible, including a description of the action(s), event(s) or transaction(s) giving rise to the concern or complaint, names, dates, places and the employee's perception of why the action(s), event(s) or transaction(s) constitute questionable activity.

- c. Employees may utilize this confidential complaint procedure if they feel that a concern or complaint previously raised with a supervisor or the Corporate Compliance Officer was not appropriately handled.

2. Scope of Matters Covered by This Procedure

Some common examples of unethical, illegal, unsafe or questionable activities include, but are not limited to:

- Accounting or auditing irregularities (including those specified in the Sarbanes-Oxley Act of 2002)
- Conflicts of interest
- Improper dealings with governmental officials, customers or vendors, such as kickbacks or preferences for relatives
- Theft and fraud
- Misuse of assets, including proprietary or confidential information
- Harassment or intimidation, including sexual harassment
- Improper discrimination
- Creating or ignoring safety hazards
- Environmental issues

3. Treatment of Complaints

- a. Upon receipt of a concern or complaint, the Company shall perform a review. All reports will be handled promptly and discreetly.
- b. The Company will not discharge, demote, suspend, threaten, harass or in any manner discriminate against any employee in the terms and conditions of employment based upon any lawful actions of such employee with respect to good faith reporting of concerns or complaints.

4. Reporting and Retention of Complaints and Investigations

The Company will maintain a log of all complaints, tracking their receipt, investigation and resolution and shall prepare a periodic summary report thereof for the Audit Committee. Copies of the log and all such complaints will be maintained in accordance with the Company's document retention policy.