

## Scope

The provisions of this policy apply to all Divisions and Subsidiaries of Southwestern Energy Company (“SWN”).

## Definitions

As used in this policy, the following terms are defined as follows:

**“Discrimination”** means unlawful discrimination regarding recruiting, hiring, training, evaluation, assignment, advancement and termination of employment on the basis of a Subject Factor.

**“Harassment”** means any unwelcome verbal, written, physical or visual conduct based a Subject Factor where such conduct culminates in (i) a tangible adverse employment action against the individual at which the conduct is directed, (ii) unreasonable interference with an individual’s work performance, or (iii) the creation of an intimidating, hostile or offensive work environment. Harassment includes sexual harassment. By way of illustration, some examples of conduct that could constitute harassment include:

- Offensive racial, ethnic, religious or age-related jokes or insults;
- Distributing or displaying offensive pictures or cartoons;
- Verbal abuse based on any Subject Factor;
- Sexual harassment; and
- Using voicemail, email or other electronic mediums to engage in any of the above-described conduct.

**“Retaliation”** means any adverse employment decision or policy directed at an individual because of that individual’s opposition to, reporting of, or participation in a complaint regarding, discrimination and/or harassment in the workplace.

**“Sexual Harassment”** means any unwelcome sexual advances, request for sexual favors, or other verbal, written, physical or visual conduct of a sexual nature directed toward an individual, when (i) submission to such conduct is made, either explicitly or implicitly, a term or condition of the individual’s employment, (ii) submission to or rejection of such conduct is used as the basis for employment decisions affecting the individual, or (iii) such conduct has the purpose or effect of unreasonably interfering with the individual’s work performance or creating an intimidating, hostile, or offensive work environment. Sexual harassment can include conduct directed at an individual of the same or opposite sex as the person who is the source of the conduct. By way of illustration, some examples of conduct that could constitute sexual harassment include:

- Unwanted sexual advances;
- Subtle or overt requests for sexual favors;
- Telling or distributing jokes of a sexual nature or relating to sexual orientation, gender identity or expression;
- Suggestive, insulting, or obscene gestures; and
- Lewd or demeaning comments of a sexual nature.

**“Subject Factor”** means 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, harassment or retaliation, as applicable.

### Equal Opportunity Statement

Sound relationships among Southwestern Energy Company employees are essential to achieving and maintaining productivity and a high level of business conduct. Basic to these relationships is Southwestern Energy’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. We also forbid harassment or intimidation on any of these bases. We could never list all unacceptable bases for discrimination, harassment and intimidation, and in employment matters like everything, we always turn to a key element of our Formula—“Doing the Right Thing.”

### Guidelines

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 state and/or federal law. Any individual that 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.

### Procedure

An employee who reasonably believes that he or she or another SWN employee has been the subject of harassment, discrimination and/or retaliation should immediately report the conduct pursuant to the procedures described herein.

- a) An employee should immediately report any perceived harassment, discrimination and/or retaliation to his or her immediate supervisor, unless the employee reasonably determines that doing so would not be appropriate:

- where the employee's immediate supervisor is the alleged perpetrator of the harassment, discrimination and/or retaliation, or :
  - where the employee's immediate supervisor witnessed or has knowledge of the applicable harassment, discrimination and/or retaliation but has not taken appropriate remedial and/or corrective action.
- b) In situations as outlined above, the employee may use on of the following resources to report the conduct
- Human Resources
  - Supervisory chain of command
  - Corporate Compliance Office at 832-796-6100.
- c) Upon being informed of any perceived harassment, discrimination, and/or retaliation, the supervisors and officers of SWN shall promptly take reasonable steps to ensure that appropriate investigative, remedial and/ or corrective actions are taken in accordance with this policy.
- d) If an employee learns of any credible accusations of harassment, discrimination and/or retaliation made by another SWN employee, the employee shall immediately report such accusations to his or her immediate supervisor, Human Resources, or their supervisory chain command.

All allegations of harassment, discrimination and/or retaliation should be carefully documented by the employee. If the reporting employee cannot or does not wish to fully document the charge, the employee shall be interviewed by SWN and appropriate documentation will be created by SWN.

It is SWN's policy to promptly and thoroughly investigate any reports of harassment, discrimination and/or retaliation.

- 1) During any investigation of alleged harassment, discrimination and/or retaliation, SWN shall put in place such reasonable interim measures as it deems appropriate to facilitate the investigation and/or promote harmony and productivity in the workplace.
- 2) No person or persons that are implicated in allegations of harassment, discrimination and/or retaliation will be directly involved in the conduct of the investigation(s).
- 3) All material aspects of any investigation into allegations of harassment, discrimination and/or retaliation will be documented and maintained in a confidential file by SWN.
- 4) As part of any investigation into allegations of harassment, discrimination and/or retaliation, the alleged perpetrator(s) will be interviewed by SWN and afforded an opportunity to refute the allegations.

Under no circumstances will the reporting of actual harassment, discrimination and/or retaliation, or what could reasonably be construed as harassment, discrimination and/or retaliation, result in any punitive action taken against the reporting employee.

In the event that an investigation by SWN reveals that an employee has engaged in conduct constituting harassment, discrimination and/or retaliation, prompt and appropriate action will be taken by SWN against such employee, up to and including termination of employment. SWN may discipline any employee for engaging in conduct constituting harassment, discrimination and/or retaliation, regardless of whether or not such conduct constitutes a violation of any applicable law, rule or regulation promulgated by any local, state or federal governmental authority.

In the event that an investigation by SWN (i) fails to establish that an accused employee has engaged in conduct constituting harassment, discrimination or retaliation or (ii) affirmatively reveals that an accused employee has not engaged in such conduct, all relevant parties will be informed by SWN of such result. Additionally, if an investigation establishes that allegations of harassment, discrimination and/or retaliation are false and without foundation, then SWN will take prompt and appropriate action against the alleging employee, up to and including termination of employment.

In order to ensure compliance with SWN's Equal Employment Opportunity policy, the appropriate officer or officers of SWN will be advised of all allegations of harassment, discrimination and/or retaliation, as well as of the final outcome of all resulting investigations.