

Scope

Commitment to a Drug and Alcohol-free Workplace

Southwestern Energy Company and its subsidiaries (collectively, “SWN”) are committed to providing a safe, healthy and productive work environment for all employees. Consistent with this commitment, this policy establishes SWN’s intent to maintain a drug and alcohol-free workplace and applies to all SWN employees, and also to vendors and contractors that work on SWN property (the “Policy”). Being under the influence of alcohol or illegal drugs, including marijuana, while on the job poses serious health and safety risks and is not tolerated.

Compliance with this policy is a condition of employment, and any violation will be subject to SWN’s consequences, up to and including termination.

Prohibited Conduct

SWN expressly prohibits the following activities at any time that employees are either (1) on duty or conducting SWN business (either on or away from SWN's premises), or (2) on SWN's premises (whether or not the employee is working):

- The use, abuse or being under the influence of alcohol, illegal drugs or other impairing substances, including legally obtained drugs or prescription medications if the use of such substances negatively impacts or impairs a worker's ability to safely perform job-related duties. Employees may not use any medications in any way contrary to the directions provided by an authorized and legal prescribing professional, including exceeding the recommended dosage.
- The possession, sale, purchase, transfer or transit of any illegal or unauthorized drug, including prescription medication that is not prescribed to the employee or drug-related paraphernalia.
- The illegal use or abuse of prescription drugs.

This policy does not prohibit the appropriate use of over-the-counter medication or other medication that can legally be prescribed under both federal and state law, to the extent that it does not impair an employee's job performance, safety or the safety of others, or require medical pre-approval prior to its use. Employees who take over-the-counter medication or other medication that can legally be prescribed under both federal and state law to treat a disability should inform their supervisor if they believe the medication will impair their job performance, safety or the safety of others or if they believe they need a reasonable accommodation **before** reporting to work while under the influence of that medication.

Marijuana, even if prescribed under a state medical marijuana law or if otherwise legal under state or local law, remains illegal under federal law, and, therefore, being under the influence of marijuana is prohibited by this Policy.

Employees or individuals otherwise subject to this policy taking any medication, whether prescribed by a doctor of any kind or purchased over-the-counter or otherwise, will inform their supervisor and their HR Business Partner of this fact in the following circumstances: the medication identifies side effects that could impair an employee's ability to safely perform his or her job function, including, but not limited to, drowsiness, disorientation, hallucinations, or memory loss; the medication includes warnings against performing activities similar or related to an employee's job functions, including driving or operating machinery; or the employee otherwise has reason to believe that the medication may impair an employee's ability to perform safely his or her job function.

Employees that are governed by the Department of Transportation regulations ("regulated employees") must notify their supervisor and their HR Business Partner with 24 hours of being arrested for DWI or DUI, pleading guilty to an alcohol or criminal drug offense, or being convicted of an alcohol-related or criminal drug offense, and are immediately prohibited from driving any vehicle covered by the SWN Driving Policy.

Testing

Employees and anyone otherwise subject to this Policy are required to participate in SWN's drug and alcohol testing program to determine the presence of drugs and/or alcohol in violation of this Policy. Refusal to participate in or otherwise cooperate with a test in any way is a violation of this Policy.

SWN will conduct tests for alcohol and/or prohibited drugs under the following work-related conditions:

Pre-Employment Testing: Applicants for all positions will be required, once offered a position, to successfully pass a drug and alcohol test as a condition of their employment offer. Refusal to take a test in the prescribed time frame or testing positive will disqualify an applicant from employment.

Post-Accident Testing: Non-regulated employees will be subject to post-accident testing if SWN determines that the employee's performance contributed to an accident or cannot completely discount the fact that the employee's performance was a contributing factor to the accident. Regulated employees will be subject to post-accident testing as required by USDOT- Title 49 regardless of culpability.

Random Testing: Random drug and alcohol testing is done in order to deter drug and alcohol use and to ensure a drug free workplace. Random testing will be conducted unannounced. Regulated employees will be tested in accordance with all USDOT requirements.

Reasonable Suspicion / For Cause Testing: Reasonable Suspicion / For Cause testing may be conducted to identify alcohol and/or drug-affected employees or groups of employees who are suspected of posing a danger to themselves and others in their job performance. This may be an observed collection.

Return to Duty Testing: Any non-regulated employee who has been removed from work because of a positive drug or alcohol test, or who voluntarily reported a substance abuse problem requiring treatment may be required to provide a negative test prior to returning to regular duty. Employees who test positive on a Return to Duty test or follow up test can be terminated.

Prior to promotion or transfer into a regulated position: Employees who transfer or are promoted into a regulated position may be required to submit to a drug and /or alcohol test.

Procedure

Managers and supervisors are accountable for implementing this Policy in accordance to the procedures outlined in the Substance Abuse Free Workplace Procedures located on SWN.net/HR/Policies and Forms.

Inspections

SWN reserves the right to inspect vehicles, premises and property (including offices, desks, lockers, etc.) and personal effects (handbags, briefcases, packages, coats, etc) when there is reasonable cause to believe an employee has violated this Policy.

Exceptions:

Notwithstanding the general policy prohibiting use or possession of alcohol, alcohol may be served and consumed responsibly at Company-sponsored functions (i) held at our offices if arranged through the catering services used by the local facilities group or at entertainment venues where the alcohol is served by the venue and (ii) the event is approved through normal channels for the business unit or corporate department.

SUBSTANCE FREE WORKPLACE POLICY

CONFIDENTIAL CONSENT FORM FOR

DRUG SCREENING TEST

Consent form for:

- Pre-Employment Testing
- Random Testing
- Post-Accident Testing
- Reasonable Cause Testing
- Prior to promotion/transfer to regulated job

I, _____, do hereby consent to give a urine specimen under the terms
(Print Name)

and conditions of the Southwestern Energy Company's Substance Free Workplace Policy. I also acknowledge that my agreeing to abide with the terms of Southwestern Energy Company's Substance Free Workplace Policy is a condition of employment or continued employment with Southwestern Energy Company. My failure to consent to giving a urine specimen may result in my termination.

I understand that the specimen will be sent to a qualified laboratory for drug screening test and do hereby authorize and consent for the test results to be sent to the Company's Medical Review Officer (MRO). I further understand, authorize, and consent that the MRO will make the test results available to the Drug Program Manager (DPM), or authorized designee. I further understand that the results of this test will be used at the discretion of the DPM or authorized designee.

I understand that if I am applying for a commercial motor vehicle driving position and my test results are positive, I will be reported to the Commercial Driver Alcohol and Drug Testing Database as required.

I am willing that a photo static copy of the authorization be as valid and effective as the original at any time hereafter irrespective of the date hereof.

Signed: _____ Date: _____

Address: _____

City: _____ State: _____ Zip: _____

Company Witness Signature: _____ Date: _____