

Equal Employment Opportunity

Scope

The provisions of this policy apply to all Divisions and Subsidiaries of Southwestern Energy Company.

Guidelines

1. 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."
2. Southwestern Energy has an Affirmative Action Program to ensure that it will administer all personnel actions such as recruitment, hiring, promotion, transfers, compensation, training and education, terminations, lay-offs, recalls, company-sponsored events, and the drug and alcohol testing program with respect to employment, compensation, promotions, or any other terms and conditions of employment on a non-discriminatory basis as described above.

Procedure

1. An Affirmative Action Plan will be created annually and presented to management.
2. Human Resources is responsible for auditing the AAP and reporting areas of underutilization.
3. All managers and supervisors have the responsibility to fully support this policy through leadership and personal action.
4. All solicitation advertisements will state that the Company is an Equal Opportunity Employer.
5. The Company will develop a course of action to remedy areas of underutilization of minorities and females.

Equal Employment Opportunity

6. The Company will give full consideration to the reasonable accommodation for those with disabilities.
7. Placement, transfer and promotion activities will be monitored to assure that full consideration has been given to all qualified minorities and females.
8. Training programs will be reviewed to ensure that all employees to whom the training applies are given an equal opportunity to participate.