



HSER Compliance Assurance Standard

1. PURPOSE

This Standard establishes minimum requirements to assess the adequacy of current risk controls and compliance with HSER and Operations standards, operating procedures, and legal or regulatory requirements as required by the HSER and Operations Integrated Management System Program.

2. SCOPE

This Standard is applicable to assets of Expand Energy (EXE), its affiliates or subsidiaries as well as employees performing work on Expand properties or on the company's behalf. Joint ventures, partnerships and contractors are included in the scope when allowed by contract.

3. DEFINITIONS

HSER Compliance Obligations – Applicable health, safety, environmental and legal requirements, enforceable agreements, and voluntary commitments.

HSER and Operations Integrated Management System (IMS) – The framework of processes, compliance measures, internal controls, operating requirements, and governing documents designed to support corporate policy and expectations around safe and compliant operations.

Shall – Denotes a minimum requirement to conform to the Standard. To aid the reader, "shall" requirements are identified in bold. Any deviation from a minimum requirement must be approved via the Standard Exception Form.

Should – Denotes a recommendation, or that which is advised, but not required to conform to the Standard

4. ROLES & RESPONSIBILITIES

Business Units (BU)	• Provide sufficient resources to support an effective audit program • Identify and implement applicable corrective actions • Monitor the audit tracking system and ensure corrective actions are properly documented and closed
HSER	• Maintain a documented HSER and Operations audit process • Develop and maintain protocols for auditable HSER standards and procedures • Plan, schedule, conduct and communicate results of audits

Operations

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- Support BU in corrective action development and completion
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- Develop and maintain audit protocols for auditable Operations standards and procedures
 - Identify and assign qualified personnel to participate in scheduled audits; if possible, personnel should not audit their current BU
 - Participate in audit planning and working meetings and provide audit work product to Audit Coordinator
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5. REQUIREMENTS

HSER Compliance Assurance audits provide senior leadership with independent, objective and consistent assessments of risk and compliance with legal, regulatory and internal HSER and Operational standards and procedures. The authority for this auditing function has been delegated to HSER by the Operations Governance Board and results are reported to them.

Auditing priorities **shall** be based upon the inherent risk of business/operations as well as regulatory requirements. Joint ventures, partnerships and contractors **shall** be addressed in the auditing process.

5.1 AUDIT PROGRAM

The HSER Compliance Assurance Auditing Procedure describes and documents processes which include:

- Audit schedules, scope, process steps, and individual responsibilities
- Auditor qualifications, including Company and third-party auditors
- Risk ranking of audit findings
- Documenting and reporting audit results to management
- Developing Corrective Action Plans and tracking corrective actions to closure
- Annually evaluating the effectiveness of the auditing processes

5.2 AUDITORS

Auditors should be objective and, if possible, independent of activities being audited. Auditors **shall** possess adequate qualifications, technical knowledge, training and auditing proficiency to perform their assigned audit tasks.

5.3 RESPONSE TO AUDIT FINDINGS

Audit reports document higher risk observations and apparent systemic issues that warrant formal corrective action and are shared with the audited asset and Expand leadership. Stakeholders from the audited asset develop corrective actions which **shall** be approved by BU leadership. HSER oversees and tracks corrective action plan progress.

6. TRAINING

Training on Expand Energy's audit procedure is required for auditors.

7. AUDIT REQUIREMENTS

Audits **shall** be conducted by internal audit to verify compliance with this Standard.

8. STANDARD EXCEPTIONS

Deviations from "shall" in this Standard require a Standard Exemption. The Standard Exemption form may be found in Controlled Documents on The Point.

9. REFERENCES

- HSER & Operations IMS Program
- HSER Compliance Auditing Procedure

10. DOCUMENT CONTROL TABLE

Title: HSER Compliance Assurance Standard			Document Number: HSER-EXE-STD-039	
Next Review Date: 07/30/2029				
Originating Department: HSER				
Version History				
Version	Issue Date	Description	Author(s)	Approved By
1.0	07/30/2026	New Standard for EXE.	Dana Drury	OGB