

Expand Energy Corporation respects the dignity and fundamental rights of all human beings, as reflected in our core values of character and stewardship. We are committed to upholding these inalienable human rights and freedoms in the communities where we operate and for the people affected by our business activities.

**Scope**

Expand Energy’s employees, officers, directors, contractors and suppliers are required to comply with our human rights policy. Adherence to human rights laws is driven by the work of several departments within our organization, including our Legal, Human Resources, Supply Chain and Health, Safety, Environmental and Regulatory (HSER) departments. These principles are reflected in our [Code of Business Conduct](#), [Supplier Code of Conduct](#) and our contracting practices.

**Policy**

Expand Energy firmly believes that corporate citizens have an important role in protecting human rights. We take this responsibility seriously, committing to avoid adverse human rights impacts from our operations and business relationships, and to address and mitigate any such impacts, whether actual or potential.

As an upstream exploration and production company that operates only in the U.S., we uphold and champion federal, state and local human rights, anti-discrimination and labor laws, regulations and policy frameworks that protect individuals from social, political or economic discrimination or abuse. In addition to following applicable laws, we conduct all aspects of our business in accordance with our [core values](#), which are foundational to our corporate culture.

While Expand Energy does not currently have any international operations, our human rights commitment is consistent with the philosophies expressed in the following global frameworks:

- [UN Universal Declaration of Human Rights](#)
- [UN Guiding Principles on Business and Human Rights](#)
- [International Labour Organization’s Declaration on the Fundamental Principles and Rights at Work](#)

Recognizing that human rights risks, issues and practices associated with our operations will continue to evolve and are often dependent on geographic scope, Expand Energy will continue to review and update our human rights commitment and policies accordingly.

**Labor Practices**

Expand Energy’s approach to creating an ethical work environment starts with a respect for our employees and an appreciation for federally and internationally accepted labor standards. We support the International Labour Organization’s Declaration of Fundamental Principles and Rights at Work and reflect these principles in our human resources practices.

Expand Energy offers all individuals an equal opportunity to join the company and works to ensure equal employment opportunities at our subsidiaries and affiliates. We are committed to a proactive program of affirmative action and diversity development striving to maintain an inclusive work culture in which each employee feels respected and valued.

Expand Energy prohibits discrimination and harassment based on:

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|---------------------------------|---|
| • Age                           | • Military or veteran status                                  |
| • Color                         | • National origin   |
| • Creed                         | • Pregnancy   |
| • Disability                    | • Race  |
| • Gender                        | • Religion  |
| • Gender identity or expression | • Sexual orientation  |
| • Genetic information           | • Or any other protected characteristic as established by law |
| • Marital status                |   |

Expand Energy aims to ensure that our work environments—and those of our business partners — are free from all forms of discrimination, harassment, violence and harmful behaviors. To support this goal, we provide our employees with regular anti-discrimination and anti-harassment training.

Regardless of the jurisdiction where we may operate, Expand Energy compensates its employees competitively based on market standards and living requirements and in compliance with applicable labor laws, including but not limited to anti-discrimination, child labor and fair wage laws.

We also recognize and respect our employees’ right to join associations and choose representative organizations for the purpose of engaging in collective bargaining in a manner that is consistent with applicable laws, rules, regulations and customs.

**Supply Chain**

Expand Energy works to protect the human rights of all affected by our business activities, particularly those parties engaged in our supply chain. It is the expectation of our Board of Directors and senior management that our vendors, contractors, suppliers and business partners respect our voluntary commitments and comply with our Supplier Code of Business Conduct and all other related policies.

**Health, Safety and Security**

Expand Energy has adopted and delivers on strict safety standards, prioritizing the well-being of our employees, business partners and other members of the communities in which we operate. We continuously endeavor to provide all employees, contractors and others who are on company property with a safe and secure environment. We observe and comply with all applicable laws, rules and regulations respecting employee health and safety, as well as company HSER policies.

**Recognizing Indigenous Peoples**

Expand Energy recognizes the unique rights and cultures of Indigenous peoples and is committed to addressing concerns and any potential impacts of our operations. While we do not have any active operations on tribal, Indigenous or native lands, if we participate in any future partnerships, we will be respectful of the culture and customs of Indigenous peoples. We also commit to act in accordance with applicable laws and to consult with local community leaders and residents, should our activities affect any areas of importance to Indigenous peoples.

Our current and planned activities do not involve any involuntary settlement of people or of their economic activities. Should the potential arise for relocation, Expand Energy will conduct meaningful consultation with affected peoples and their communities to promote fair and just resolutions. We are committed to ensuring that issues, concerns or grievances are addressed through this community engagement process, other grievance mechanisms, and fair compensation and livelihood restoration in compliance with applicable laws and regulations.

**Grievance Mechanisms and Reporting**

With oversight from Expand Energy’s Board, all employees are required to comply with this policy and related directives. Expand Energy regularly hosts training sessions about our Code of Business Conduct and employees complete an annual acknowledgement of the Code.

Expand Energy’s vendors, contractors, suppliers and business partners must also acknowledge and commit to the expectations and ethical standards set forth in our Master Service Agreements, other contracts and Supplier Code of Conduct, which incorporates the standards set out in this policy.

We strive to create an open environment where everyone is empowered to raise any conduct that may be unethical, illegal or in violation of this policy, the Code or any of our policies and practices.

**We offer the [Expand Ethics and Integrity Helpline](#), an anonymous, third-party confidential hotline and secure website that is available to anyone 24/7 to report concerns.**

Expand Energy is committed to investigating all good faith concerns and will take the actions necessary to resolve and prevent further issues from arising. All relevant reports of unethical business conduct — including any perceived violations or investigations into human rights abuses — are shared with the Board Audit Committee and, if appropriate, the Board Environmental and Social Governance Committee. We will routinely monitor, assess and report on our compliance with this policy.