


Title:	Non-Retaliation Policy			
Type:	Corporate Policy	Version:	10/01/24 (v.3)	
Function:	General	Last Reviewed:	10/01/24	
Dissemination:	Internal only	Original Issuance:	5/7/14 (v.1)	
Owner:	General Counsel			LGL-01

1. PURPOSE

To ensure officers and employees of Expand Energy Corporation and its affiliated and related companies ("Expand Energy" or the "Company") know their right – and duty – to raise good faith concerns regarding known or suspected Misconduct and create a safe and confidential environment, free from unlawful Retaliation.

For purposes of this Policy, Misconduct, includes but is not limited to improper, unethical, or illegal conduct or any activity that violates the Company's Core Values, Code of Business Conduct, policies, or other Company expectations. For purposes of this Policy, Retaliation, includes but is not limited to interference, reprisal, retaliation, threats, harassment, coercion, withholding of resources, or intimidation.

2. SCOPE

This policy applies to all Company employees.

3. POLICY

3.1 Non-Retaliation

Retaliation or threats of Retaliation against employees or business partners for raising any good faith concern about known or suspected Misconduct will not be tolerated and may result in disciplinary action. Reporting in good faith means that you provide all of the information you have and believe your report to be true.

No employee or business partner may be retaliated against for cooperating with an investigation of a concern or for refusing to carry out an instruction that would constitute fraud, violate federal or state law, or violate the Company's Code of Business Conduct or policies.

3.2 Confidentiality

Confidentiality will be maintained to the fullest extent possible. All reported concerns are subject to appropriate investigation and are brought to full closure using a systematic process and tracking system. Such information shall be shared only on a "need-to-know" basis with those individuals investigating or responding to the concern.

3.3 False Reports

Employees who knowingly raise a misleading or false concern or raise a concern without a reasonable belief as to its truth or accuracy will not be protected by this policy and may be subject to discipline, up to and including separation.

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3.4 Policy Violations

Failure to comply with this policy can damage the Company's reputation and expose the Company and the employee to criminal and civil penalties. Any employee who violates this policy, orders another to violate this policy, or knowingly permits a subordinate to violate this policy will be subject to disciplinary action, up to and including separation.

If you are aware of any violations or potential violations of this policy, or believe you are the victim of Retaliation, you must report all related information using one of the following methods:

- consult the General Counsel or Legal Department;
- consult the Chief Compliance Officer or Compliance Department;
- file a report using the Expand Energy's Ethics and Integrity Helpline by calling 866-291-3401 or accessing www.expandethics.com; or
- register your concern by contacting our Board of Directors via the Director Access Line at 866-291-3401 or email TalktoBoD@expandenergy.com.

4. RELATED DOCUMENTS

Not applicable.