



expand

**LIVING OUR CORE VALUES**

# Supplier Code of Conduct



# Introduction to Our Supplier Code of Conduct

Expand Energy Corporation is committed to living our core values of stewardship, character, learn, collaborate and disrupt. We have adopted a [Code of Business Conduct](#) applicable to Expand Energy employees, officers and directors that sets the standards for who we are and how we operate. Based on the principles of our Code of Business Conduct, this Supplier Code of Conduct communicates the expectations we have for ethical conduct and fair dealing.

Our relationships with vendors, contractors and suppliers are critical to achieving responsible and ethical corporate performance. Together, the Code of Business Conduct and the Supplier Code provide the foundation for relationships built on lawful and fair practices.

For the purposes of this Supplier Code, “supplier” refers to any company, corporation or other entity or person that provides, or seeks to provide, goods or services to Expand Energy, and includes the supplier’s employees, agents, workers, representatives, contractors and subcontractors.

## Compliance with the Supplier Code of Conduct

Suppliers should carefully review the Supplier Code. Suppliers are responsible for ensuring that they comply with Expand Energy’s standards of conduct. We expect our suppliers to avoid even the appearance of improper behavior. Suppliers must never act in any way that undermines compliance with the Code of Business Conduct or the Supplier Code. The Supplier Code also outlines important mechanisms for mutual accountability, including the requirement that Expand Energy and its suppliers promptly report all ethical concerns involving Expand Energy and cooperate in any investigation of alleged violations of the Code of Business Conduct or the Supplier Code.

Expand Energy will terminate its relationship with any supplier that does not adhere to this Supplier Code and remove them from the company’s approved supplier list.





## Our Responsibilities to One Another

**Expand Energy expects its employees and business partners to respect one another and the unique character and contribution they bring to our operations. Treating each other with dignity, respect and fairness is the foundation of good business conduct. Expand Energy and its suppliers must conduct their business interactions and activities in a respectful manner.**

### **Environmental, Health and Safety**

Suppliers must share Expand Energy's commitment to providing a safe and healthy workplace and conducting operations in an environmentally responsible manner. Suppliers are responsible for observing all environmental, health and safety laws, regulations, rules and permit requirements that apply to their operations. They must also take precautions to protect the environment and the health and safety of their employees, Expand Energy employees, business partners and members of the communities in which we operate.

Suppliers must promptly report and take immediate steps to correct all accidents, injuries, unsafe or unhealthy conditions, and potential violations of environmental, health or safety laws, regulations or Expand Energy policies. Requests to violate established environmental, health and safety procedures in connection with Expand Energy-related activities must never be acted on and must always be reported. In addition, each supplier has the obligation to stop work activities that may represent a threat to safety or the environment.

### **Human Rights Commitment**

All business partners must share Expand Energy's commitment to uphold the inalienable rights and freedoms all human beings in the areas in which we operate and compliance with Expand Energy's Human Rights Policy is mandatory for all Suppliers. Suppliers must ensure that all people with which they engage are able to live their lives free from social, political or economic discrimination, or abuse. As a result, Suppliers are expected to commit to avoiding adverse human rights impacts from its operations and business relationships, and to address and mitigate any such impact, whether actual or potential. Child labor and forced labor are strictly prohibited.

### **Our Commitment to a Culture of Respect and Inclusion**

At Expand Energy, we are committed to fostering and maintaining a culture where every person feels valued, respected and empowered to contribute fully. When we honor these principles, we are more innovative and successful.

Our culture, reputation and achievements are built from the diverse life experiences, knowledge, innovation, self-expression, capabilities and talents that each employee brings to work every day. We respect and value differences in age, color, disability, ethnicity, family or marital status, gender identity or expression, language, national origin, physical and mental ability, political affiliation, race, religion, sexual orientation, socio-economic status, veteran status and other characteristics that make our people unique.

Expand Energy's commitment to equal opportunity, inclusion and belonging is applicable to our employment practices and policies; social and recreational programs; supplier diversity; and the ongoing development of a work environment supportive of our core values. These programs foster the following expectations:

- People trust that decisions are made fairly
- People feel safe expressing themselves
- Zero-tolerance for discrimination and harassment
- People feel heard, regardless of differing styles or ideas
- Seek out and learn from people unlike ourselves
- Clear strategy and direction
- Appreciate the values of our neighbors in operating areas
- Perpetual improvement and reflection, especially in the face of uncertainty or discomfort
- Seek to understand others, even if it is uncomfortable or unknown



We have a responsibility to, and expect our partners to, always treat others with dignity and respect.

#### **Dignity, Respect and Fairness**

Suppliers must cooperate with Expand Energy's commitment to an inclusive workforce free of unlawful discrimination. Expand Energy requires that suppliers not engage in discrimination in any employment practice, including recruiting, hiring, compensation, benefits, transfer, separation, training or social or recreational programs, on the basis of race, color, religion, gender, sexual orientation, gender identity, age, national origin, military or veteran status, disability or any other legally protected characteristics.

#### **Harassment, Violence and Weapons**

Harassment and violence have no place in the workplace or off-site. They are strictly prohibited in connection with Expand Energy-related activities and will not be tolerated.

Suppliers are expected to cooperate with Expand Energy's commitment to prohibit harassment and threats of violence. Expand Energy prohibits the possession of firearms, guns, explosives and any other weapons, as well as ammunition, while on Expand Energy premises unless otherwise precluded by the laws of a particular jurisdiction.

#### **Drugs and Alcohol**

Suppliers are expected to be free from the influence of alcohol, drugs and improperly used prescription medicine when conducting Expand Energy's business, whether on or off Expand Energy's premises.

#### **External Communications**

Suppliers are prohibited from engaging in any communication representing Expand Energy's opinion in any forum without prior written approval pursuant to applicable company policy.

### **EXPAND ETHICS AND INTEGRITY HELPLINE**

You must report all potential Code violations and other concerns. The Expand Ethics and Integrity Helpline is operated by a third party and provides an anonymous and confidential method for reporting ethics concerns, particularly if you don't feel comfortable raising your concerns in person. If you choose to make an anonymous report, Expand will not identify you or trace your call.

Call 866-291-3401 or visit [expandethics.com](https://expandethics.com) (secure website).



## Responsibilities to Stakeholders, Governments and Communities

**All Expand Energy suppliers must conduct business activities in full compliance with legal and regulatory requirements. Suppliers must be honest, direct and truthful in discussions with regulatory agency representatives and government officials.**

### **Antitrust Laws**

Suppliers are expected to comply with applicable antitrust and fair competition laws and to not participate in any activity that could be considered a violation of antitrust laws.

### **Anti-Corruption Laws**

Suppliers must comply with all applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act, which makes it a criminal offense to bribe or offer to bribe a foreign governmental or political official to obtain or retain business. No supplier may participate in bribes or kickbacks of any kind, whether in dealings with public officials or individuals in the private sector. Suppliers must not give, promise to give or offer to give anything of value, directly or indirectly, to a governmental official or employee, government agency, political party, public international organization or any candidate for political office in order to improperly influence any act or decision or otherwise improperly promote the business interests of Expand Energy.

### **Anti-Boycott Laws**

Suppliers must not participate or support any international boycott that is not sanctioned by the United States government or applicable laws.

### **Trade Laws**

Suppliers must comply with applicable trade controls.

### **Accounting and Disclosure Practices**

Suppliers are expected to honestly and accurately record and report all matters related to business with Expand Energy. Books, records, accounts and financial statements should be maintained in reasonable detail, appropriately reflect all transactions with Expand Energy and conform to

generally accepted accounting principles, applicable legal requirements and a system of internal controls. Suppliers shall make their books, records, accounts and financial statements available to Expand Energy upon request.

### **Records Retention**

Suppliers shall create, retain and dispose of business records in compliance with all applicable legal and regulatory requirements. Further, suppliers must cooperate with Expand Energy's business record retention needs if the supplier is advised or otherwise should recognize that a business record may be relevant to an audit, investigation or pending or threatened legal or regulatory proceeding.

### **Political Activities**

Without prior written approval pursuant to company policy, suppliers may not use Expand Energy funds or resources for political activities, make any political contributions or present any gifts on behalf of Expand Energy to any candidate for public office or elected official, or represent Expand Energy or authorize any third party to represent Expand Energy in making contacts with any federal, state or local government official (or member or employee of a legislative body or government agency) to influence policy, legislation, agency rules, regulations or any other official action.

### **Charitable Giving**

Suppliers shall not make or promise charitable contributions on Expand Energy's behalf or take advantage of their relationship with Expand Energy to inappropriately solicit Expand Energy employees, suppliers or other business partners for contributions or to become involved in a nonprofit organization.



## Responsibilities to Stakeholders and Business Partners

**Building and maintaining relationships with our stakeholders through integrity and ethical practices is critical to our long-term success. All Expand suppliers must conduct all business activities in accordance with the following requirements.**

### **Fair Dealing**

Suppliers must deal fairly with Expand Energy's customers, suppliers, contractors, royalty owners, competitors, employees and other stakeholders. Suppliers must not take unfair advantage of anyone through manipulation, abuse of privileged or confidential information, misrepresentation, fraudulent behavior or any other unfair practice.

### **Protection of Confidential Company Information and Personal Data**

Suppliers must strictly adhere to all confidentiality obligations. Suppliers may not access, use, remove, copy or share confidential company information or personal data without a legitimate business purpose and prior written approval from Expand Energy. Confidential information includes proprietary information regarding business activities and financial performance, as well as any nonpublic information that might be of use to competitors or harmful to Expand Energy or its business partners if disclosed. Suppliers must be familiar with and abide by laws and regulations that govern the collection, use and disposal of personal data, including wage, salary, benefit and other confidential information related to Expand Energy employees, contractors, directors, shareholders, royalty owners, customers and other business partners. Suppliers must ensure the confidentiality of this information and return all confidential information and personal data after their relationship with Expand Energy ends.

### **Insider Trading**

Suppliers may not use or share insider information concerning Expand Energy for the purpose of trading in Expand Energy or other securities. Insider information includes material nonpublic information about matters such as significant contracts, claims, liabilities, major litigation, potential sales, mergers or acquisitions, development plans, activities, earnings, forecasts and budgets.

### **Protection of Expand Energy Assets**

Suppliers are expected to protect Expand Energy assets against theft, loss and misuse. Expand Energy assets include tangible items like buildings and equipment, as well as intangible items like business plans and potential prospects. When operating a vehicle on Expand Energy business, suppliers are expected to do so in a safe manner.

### **Conflicts of Interest**

Suppliers must avoid actual conflicts of interest or the appearance of conflicts of interest in business transactions and relationships involving Expand Energy. A conflict of interest exists when private interests — financial or otherwise — interfere with Expand Energy's interests. Conflicts of interest commonly arise when:

- A supplier uses Expand Energy resources, such as facilities, equipment, materials, computers, office supplies, information or other assets, for personal gain or inconsistently with Expand Energy's best interests;
- A supplier takes personal advantage of a business opportunity or investment opportunity made available as a result of their relationship with Expand Energy; or
- A supplier has a family member or friend employed by Expand Energy.

### **Business Gifts and Entertainment**

Suppliers are expected to understand and comply with Expand Energy's policies governing business gifts and entertainment. Suppliers must never offer or provide personal incentives, rewards or bribes to any Expand Energy employee, contractor or supplier in an effort to influence a business decision or gain an unfair advantage. Suppliers may offer reasonable gifts and entertainment consistent with customary business practices and in compliance with applicable law and company policy as long as they do not influence

or appear to influence a Expand Energy employee to act in a manner contrary to Expand Energy's interests. Expand Energy employees are required to report all supplier gifts and entertainment pursuant to Expand Energy's gift and entertainment policy. Any item of value provided by a supplier is considered a gift — even if it is provided in conjunction with ordinary business activities. Suppliers are expected to make available upon request records detailing all gifts and entertainment provided to Expand Energy employees or contractors.

## **CONTACT**

# How to Report a Concern

Suppliers are required to promptly report all concerns involving Expand Energy, regardless of whether the concern involves the supplier, and must take reasonable steps to cooperate in Expand Energy investigations. To report questionable behavior or a possible violation of the Code of Business Conduct or Supplier Code, you should:

- **Consult the General Counsel or Legal Department at [legal@expandenergy.com](mailto:legal@expandenergy.com)**
- **Consult the Ethics Department at [ethics@expandenergy.com](mailto:ethics@expandenergy.com)**
- **File a report using the Expand Ethics and Integrity Helpline by calling 866-291-3401 or visiting [expandethics.com](https://expandethics.com) (secure website)**
- **Register your concern by contacting our Board of Directors via the Director Access Line (866-291-3401) or by written communication as described on [expandenergy.com/about/board-of-directors](https://expandenergy.com/about/board-of-directors)**

To the extent possible, Expand Energy will maintain the confidentiality of any individual reporting known or suspected misconduct. Expand Energy will not tolerate any retaliatory acts, or the threat of retaliatory acts, against any individual for reporting known or suspected misconduct.



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