



***National Fuel*[®]** **Labor & Human Rights Guidelines**

National Fuel Gas Company (“National Fuel” or the “Company”) treats all of its employees with respect and dignity and strives to promote diversity in the workplace. The Company’s policies and practices adhere to all applicable domestic laws, rules and regulations as dictated in the Company’s Code of Business Conduct and Ethics, and are guided by the ILO core labor principles concerning nondiscrimination, freedom of association and collective bargaining, forced labor and underage workers in the workplace. National Fuel also expects its independent suppliers and vendors to uphold these principles and urges them to adopt similar practices within their own businesses.

National Fuel is also committed to promoting the health and well-being of the communities where it operates, which includes incorporating human rights when assessing and addressing the impacts of Company operations.

Nondiscrimination and Protection of Classes

National Fuel is an inclusive corporation. The Company values diversity and neither engages in nor tolerates any type of harassment or discriminatory behavior. National Fuel expects each of its employees to treat others respectfully and promotes positive relationships among its employees.

National Fuel’s hiring practices adhere to all applicable domestic laws and are based on its business needs and the individual’s qualifications, abilities, and experiences. The Company prohibits discrimination against all individuals based on their race, color, nationality, religion, sex, sexual orientation, gender identity, disability, age, or other legally protected characteristics. Through contractual obligations, National Fuel notifies suppliers and vendors that they are expected to observe the same discrimination prohibitions. The Company’s Non-Discrimination and Anti-Harassment Policy expects employees to immediately report incidents of discrimination and harassment, and protects victims and witnesses from any form of retaliation. The Policy provides further that any employees found to have engaged in harassment of other employees are subject to discipline, including termination when appropriate.

Freedom of Association and Collective Bargaining

National Fuel respects its employees’ right to self-organization, to form, join, or assist labor organizations, to bargain collectively through representatives of their own choosing, and to engage in other concerted activities for the purpose of collective bargaining or other mutual aid or protection, as well as their right to refrain from any or all such activities, without fear of reprisal, intimidation, or harassment.

Forced Labor and Child Labor

National Fuel’s practices adhere to all applicable domestic laws with respect to wages, work hours, overtime and benefits laws, and prohibit the use of all forms of forced labor and child labor as promulgated under the Fair Labor Standards Act. Through contractual obligations, the Company requires that independent suppliers and vendors adhere to these same labor prohibitions.

Grievance reporting

National Fuel uses due diligence to identify and prevent human rights risks to people working at and with its companies. To date, National Fuel has not identified any human rights risks to its employees. Additionally, National Fuel’s publicly disclosed Nondiscrimination Statement provides information pertaining to filing a grievance on the basis of discrimination or inaccessibility with the Company or the U.S. Department of Health and Human Services, Office of Civil Rights.