



SUPPLIER CODE OF CONDUCT



A Message from John McGinnis, President

The overall objective of Seneca Resources oil and gas operations is to maximize the value of our mineral and human assets. The accomplishment of this objective is a function of conducting our business in a manner that reflects high levels of integrity and fairness from our employees, contractors, and the public.

As a result of our high ethical standards, Seneca Resources is committed to meeting, and frequently exceeding, the requirements of the law. We work hard to promote a culture committed to safe work practices for the protection of personnel and the environment. We expect our suppliers of goods and services to adhere to our safety policies/practices and to uphold our commitment toward each other's health and safety as well as our commitment to the environment.

This Supplier Code of Conduct describes our expectations in greater detail. Suppliers should read and understand this code and educate their employees, agents and subcontractors so they can comply with the guidelines outlined herein. Noncompliance may alter Seneca Resources' business relationship with a supplier, potentially resulting in the termination of the business relationship.

I want to thank our suppliers for their commitment to our objectives and practices. Adhering to this Supplier Code of Conduct will help ensure the highest levels of ethics, integrity, safety and environmental stewardship.

This Supplier Code of Conduct does not create contractual rights or establish all legal requirements for doing business with, or on behalf of, Seneca Resources. Each supplier is responsible for knowing, understanding and complying with any and all laws and regulations applicable to conducting business with Seneca Resources.

[Health and Safety](#)



Seneca Resources maintains the following values as a company, as a leader in the industry, and as a member of the community:

- We are committed to the health and safety of our employees, suppliers, and the public;
- We strive to provide and maintain a healthy and safe work environment;
- We follow sound operating practices and industry standards; and
- We strive to comply with all environmental, health and safety regulations.

We expect our suppliers to adhere to our safety policies/practices and to uphold our commitment toward each other's health and safety. All work must be done in the safest manner possible and suggestions for improving the safety of our work and our organization are encouraged. Suppliers must ensure that all employees working on Seneca Resources property have a sufficient understanding of the English language in order to perform their work in the safest manner possible.

Suppliers must ensure that all employees, agents and sub-contractors working on Seneca Resources property adhere to all general and site-specific safety requirements. All Seneca Resources locations are drug-free and violence-free environments.

Environmental Protection and Sustainability

Seneca Resources aims to promote a culture committed to the protection of the environment by utilizing a systematically integrated model of stewardship beyond mere compliance. We require the same level of commitment from our suppliers. Suppliers should meet or surpass all applicable statutory and regulatory requirements in addition to enhancing the communities they operate in.

Legal and Regulatory Compliance

Suppliers must comply with all applicable federal, state and local legal requirements, including those that prohibit bribery, kickbacks, corruption and other unethical business practices intended for the purpose of obtaining an unfair advantage. Each supplier is responsible for knowing, understanding and complying with any and all laws and regulations applicable to conducting business with Seneca Resources.

Conflict of Interest

A conflict of interest may exist if a supplier must choose between what is in its best interest and what is in the best interest of Seneca Resources. Potential conflicts of interest may arise if a supplier:



- Employs a Seneca Resources employee or someone with a close personal relationship to a Seneca Resources employee (e.g., a family member);
- Is partially or fully owned or controlled by a Seneca Resources employee or family member; or
- Is involved in the development of a Request for Proposal (RFP) and seeks to bid on the work covered by the RFP.

Suppliers must promptly disclose any potential conflicts of interest prior to entering into a business relationship with Seneca Resources. If a conflict arises during the course of doing business, it should be reported immediately.

Business Gifts, Travel and Entertainment

Gifts, meals or entertainment offered in the context of a legitimate business relationship with Seneca Resources may be appropriate, provided they are not of such a value or done with such frequency that they could influence business decisions of Seneca Resources employees. Gifts and entertainment must not violate applicable law, cannot be construed as a kickback or bribe, and should not create the appearance of a conflict of interest. Suppliers must never offer or provide personal discounts, incentives or rewards to Seneca Resources employees in an effort to influence business decisions.

Fair Treatment

Suppliers must conduct their operations in an ethical and honest manner that is socially responsible. All applicable labor and employment laws including those associated with equal opportunity, child labor, forced labor, working hours, wages and benefits, and a harassment-free work environment must be complied with. Neither Seneca Resources, nor suppliers, should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice.

Equal Opportunity

Contractors and subcontractors shall abide by the requirements of 41 CFR §§ 60-1.4(a), 60-300.5(a) and 60-741.5(a). These regulations prohibit discrimination against qualified individuals based on their status as protected veterans or individuals with disabilities, and prohibit discrimination against all individuals based on their race, color, religion, sex, sexual orientation, gender identity or national origin. Moreover, these regulations require, among other things, that covered prime contractors and subcontractors take affirmative action to employ and advance in employment individuals without regard to race, color, religion, sex, sexual orientation, gender identity, national origin, protected veteran status or disability.

Company Resources

Company resources are any and all assets owned or otherwise belonging to Seneca Resources and should only be used for the furtherance of legitimate business with Seneca Resources. Suppliers are responsible for the conservation, the protection, and the efficient use of Company resources.

Any information provided to suppliers must be managed in compliance with Seneca Resources policies, guidelines and requirements, particularly with respect to personally identifiable information and IT security. Confidential information shall not be shared with any third parties without the express written consent of Seneca Resources.

Business Records

Consistent with the requirements of the law, Seneca Resources keeps and maintains books, records and accounts which accurately reflect its business. In order to achieve this, suppliers must provide Seneca Resources with accurate, reliable information on a timely basis. Suppliers must follow all applicable laws and contractual requirements in creating, maintaining, and disposing of records reflecting their business dealings with Seneca Resources.

Compliance

Suppliers must comply with this Code of Conduct. Seneca Resources reserves the right to conduct investigations and audits, including supplier site visits, to verify that a supplier's business operations meet the expectations outlined in this code. Suppliers who conduct business with Seneca Resources agree to provide information to assist with investigations and audits in a timely manner.

Reporting Concerns

Suppliers must report actual or suspected noncompliance with this code. Reports may be made by:

- Sending a letter to: Seneca Resources Company, LLC
5800 Corporate Drive, Suite 300
Pittsburgh, PA 15237
Attn: Compliance Department
- Sending an email to: compliance@srcx.com
- Notifying a member of the National Fuel Gas Company Ethics Committee



- Contacting the third-party operated Hotline for Accounting and Auditing Matters: 1-800-605-1338 (reports may be made anonymously)

We encourage open discussion regarding any questions or concerns about the items outlined in this Supplier Code of Conduct. Please direct any questions or concerns to the contacts listed above.