



Labor & Human Rights Policy

National Fuel Gas Company (“National Fuel” or the “Company”) respects human rights and conducts business in an ethical manner, consistent with the Company’s guiding principles of Safety, Environmental Stewardship, Community, Innovation, Satisfaction and Transparency. National Fuel treats all of its employees with respect and dignity and promotes diversity in the workplace while diligently providing safe, reliable and affordable natural gas to the communities in which we operate.

Although the responsibility to safeguard and promote human rights primarily falls on the government, we believe these rights can also be supported by the private sector. Therefore, we acknowledge our important role as a corporate citizen across our operating footprint. Our approach to human rights is informed by various policies, declarations and principles, including but not limited to: the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work, the United Nations Guiding Principles on Business and Human Rights, and the Universal Declaration of Human Rights.

All National Fuel employees, independent suppliers and vendors are responsible for complying with this Policy.

Non-Discrimination and Protection of Classes

National Fuel is an inclusive corporation. The Company values diversity and prohibits 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.

Diversity, Equity and Inclusion

National Fuel recognizes that a diverse and inclusive workplace provides the opportunity to gain new perspectives, ideas and solutions to help the Company succeed. We actively promote diversity, equity and inclusion (DE&I), and incorporate DE&I into the Company’s culture, values and strategies. The Company maintains an EEOC compliance program, a DE&I Program, including a Director of Diversity and Inclusion position and online internal resource center, and initiatives

aimed at improving supplier diversity. In addition, our Director of Diversity and Inclusion provides an annual update to our Board of Directors.

Indigenous Peoples

National Fuel is committed to ensuring that all people are treated with fairness and respect, including Indigenous Peoples. The Company recognizes the legal and constitutionally protected rights of Indigenous Peoples.

Where appropriate, National Fuel prioritizes early identification and coordination with local tribal officials to make them aware of a proposed project and to help them address questions from their constituents.

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.

Prohibition on Forced Labor and Child Labor

National Fuel prohibits the use of all forms of forced labor and child labor, and opposes any form of human trafficking. Through contractual obligations, the Company requires that independent suppliers and vendors adhere to these same prohibitions.

Employment Practices

National Fuel strives to offer competitive benefits, compensation packages and a living wage to our employees. Our employment practices adhere to all applicable laws with respect to wages, work hours, overtime, benefits and family leave laws.

Grievance Reporting and Accountability

An individual with a concern or complaint regarding suspected wrongdoings, including those related to labor and employment practices or human rights violations, possible conflicts of interest or fraud may report such concern, on a confidential and anonymous basis if desired, using the Company's dedicated toll-free hotline (1-800-605-1338) operated by a third party service; or the Company's dedicated third party website (www.natfuelgas.ethicspoint.com). Information regarding the hotline is available to employees and the public on the Company's website.

The Company's Employee Handbook also provides direction to employees with respect to reporting actions that could constitute harassment, discrimination or corruption that would be inconsistent with this Policy. In addition to the hotline, employees who believe they have discovered or been subjected to actions that are inconsistent with this Policy should report such to their management and/or Human Resources.

Furthermore, 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.

Safe, Secure and Healthy Workplace

Safety is a core value and guiding principle at National Fuel. We are committed to providing and maintaining safe and healthy working conditions and following sound operating practices that will safeguard our employees, our customers and the communities where we operate. Across the Company, we have implemented safety programs and management practices to ensure that a culture of safety is embraced and prioritized throughout the organization, including extensive employee safety training and awareness.

National Fuel also believes that providing appropriate security safeguards for employees is critical to the Company's success, and therefore is committed to maintaining a workplace with a professional atmosphere free of harassment, intimidation and other unsafe or disruptive conditions due to internal or external threats.

Furthermore, the Company is committed to making the work environment safe and hygienic for all employees and contractors in premises under our control. This includes water, sanitation and other facility requirements.

Expectation of Suppliers

National Fuel expects its third-party providers to comply with the standards of conduct set forth in the Company's Code of Business Conduct and Ethics, Supplier Code of Conduct Policy, and this Policy. The Company communicates its expectations to third-party providers that they conduct business with integrity and ensure that their employees, representatives and subcontractors do the same.