

Supplier Code of Conduct Policy

At National Fuel Gas Company (“National Fuel” or “the Company”), we are committed to conducting business in an ethical manner, consistent with the Company’s guiding principles of Safety, Environmental Stewardship, Community, Innovation, Satisfaction and Transparency. National Fuel expects its suppliers, vendors and contractors (collectively “Suppliers”) to conduct business with integrity and in accordance with the Company’s policies and practices.

National Fuel expects Suppliers to comply with the standards of conduct set forth in the [Company’s Code of Business Conduct and Ethics](#), [National Fuel’s Labor and Human Rights Policy](#), and contractual obligations to the Company.

We expect our Suppliers to adhere to the following:

Anti-Corruption

National Fuel maintains a Code of Business Conduct and Ethics that provides guidance to our stakeholders, so that National Fuel may conduct business in the most ethical and proper manner. The Company does not tolerate bribery or corruption in any form. National Fuel expects that all Suppliers will likewise comply with our ethical standards.

Annually, National Fuel contacts Suppliers to promote adherence to these standards. This annual reminder is intended to promote transparency and prevent unethical business practices. Additionally, the Code of Business Conduct and Ethics addresses, among other things, compliance with laws, rules and regulations, schemes to defraud, conflicts of interest, gifts and gratuities, corporate opportunities, proper use of Company resources, fair dealing and confidentiality.

Non-Discrimination and Protection of Classes

National Fuel prohibits discrimination against all individuals based on their race, color, nationality, religion, sex, sexual orientation, gender identity, disability, age, or other legally protected classifications. Through contractual obligations, National Fuel notifies Suppliers that they are expected to observe the same discrimination prohibitions.

Diversity, Equity and Inclusion

National Fuel is an inclusive corporation and promotes a culture of respect. Improving Supplier diversity is an integral part of our commitment to promote greater diversity and to reflect the communities we serve. It is the Company’s goal to strengthen its relationships with certified minority-owned businesses, women-owned businesses, LGBTQ+-owned businesses, service disabled/veteran-owned businesses, disability/physically challenged-owned businesses and other businesses with recognized diversity classifications.

Annually, we contact Suppliers to remind entities that we recognize these certifications and value diversity. National Fuel encourages its Suppliers to similarly strengthen their relationships with diverse business entities and utilize diverse Suppliers, when possible, while performing work on the Company’s behalf.

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. We expect all Suppliers to similarly respect these labor practices, as well as comply with any applicable labor laws or regulations.

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 adhere to these same prohibitions.

Employment Practices

National Fuel strives to offer competitive benefits, compensation packages and a living wage to our employees. We expect our Suppliers to comply with applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. The Company expects Suppliers to abide by the letter and spirit of National Fuel's Labor & Human Rights Policy available on our [website](#).

Information Security, Privacy and Data Protection

National Fuel believes that strong information security is critical to the Company's operations and therefore is committed to continuously reevaluating and strengthening the Company's data privacy and security posture. Suppliers are expected to implement and maintain physical, cybersecurity and administrative safeguards to ensure the confidentiality, integrity and availability of Company information. The Company expects Suppliers to comply with all applicable data privacy and security contractual obligations and promptly report to the Company any known or suspected security incidents that may impact the Company's information, data assets or system operations.

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. We expect Suppliers to prioritize safety within their own organizations and to comply with all applicable health and safety laws and regulations. National Fuel also expects Suppliers to implement appropriate steps to prevent accidents and minimize exposure to health risks, as well as continually make improvements relating to safety performance.

National Fuel is committed to providing appropriate security safeguards for employees and maintaining a work environment free of harassment, intimidation and other unsafe or disruptive conditions. Suppliers are expected to treat members of the workforce with respect and maintain a professional atmosphere free of such conditions. In addition, Suppliers are expected to comply with any applicable Company policies related to background checks, physical, technical and

administrative security requirements, identification requirements, and access to Company facilities.

Furthermore, the Company is committed to making the work environment safe and hygienic for all employees and contractors in premises under our control. Suppliers are expected to support a safe and healthy working environment and to promptly report any unsafe or unhealthy working conditions.

Environmental

In keeping with our core value of Environmental Stewardship, National Fuel understands that we have an obligation to the communities where we operate through minimizing any impacts on the environment and natural resources in and around those operating areas. National Fuel's operating subsidiaries have developed and implemented procedures, technologies and best management practices to develop, operate and maintain our assets in a manner that respects and protects the environment.

Suppliers are expected to share the Company's commitment to Environmental Stewardship and understand and abide by National Fuel's Environmental Policy Statement available on our [website](#). In addition, National Fuel expects Suppliers to comply with applicable environmental laws, regulations and applicable Company policies and encourages Suppliers to implement environmental best management practices.

Compliance and Reporting Violations

All Suppliers who conduct business with National Fuel are expected to adhere to the standards set forth herein. Each Supplier is expected to inform us promptly of any violation related to this Policy, as soon as the Supplier has knowledge of such violation. If a Supplier becomes aware of any situations that may violate the letter or spirit of the Company's Code of Business Conduct and Ethics, or this Supplier Code of Conduct Policy, the Supplier should contact the Company's Ethics Committee Chairperson, at (716) 857-7095 or Chief Auditor, at (716) 857-7414, or write to either at National Fuel Gas Company, 6363 Main Street, Williamsville, NY 14221.

Suppliers may also report a concern to the Company's dedicated toll-free hotline (1-800-605-1338) operated by a third-party service company; or the Company's dedicated third-party website (www.natfuelgas.ethicspoint.com). Information regarding the hotline is available on the Company's [website](#).