



National Fuel®

**2024 CORPORATE
RESPONSIBILITY REPORT**

safe
reliable
affordable
sustainable



Contents



Glossary of Terms	3	Governance	11	Environmental	26	Safety	46	Social	59	Appendices	77
Letter to Stakeholders	4	Board Diversity and Independence.....	12	Embracing Environmental Stewardship	27	Safety Culture and Highlights	47	Our People	60	TCFD	78
Executive Summary	5	Investment Community Engagement	12	Greenhouse Gas Emissions	28	Employee and Contractor Safety.....	48	Employee Attraction, Retention, and Development	61	SASB Standards	79
2024 Report Highlights.....	6	Leadership and Business Ethics.....	13	Air Quality	34	Compliance, Training, and Development	50	Workforce Highlights.....	63	Workforce Demographic Data.....	87
Company Overview.....	7	Advocacy.....	14	Ecological Impacts and Biodiversity Protection	36	Customer and Community Safety.....	51	Cultivating an Inclusive Culture.....	64	Workforce Safety Data.....	88
Our Guiding Principles.....	8	Information Security.....	15	Water Management and Integrity	43	Emergency Preparedness and Response.....	53	Our Vendors and Suppliers.....	66	Consolidated Data Tables.....	89
Our Community and Stakeholder Engagement.....	9	Governance of Corporate Responsibility, Sustainability, and Climate Risk	16	Waste Management	44	System Integrity and Safety	54	Serving Our Communities and Customers	67	Independent Third-Party Verification of Emissions Data	94
Corporate Responsibility Focus.....	10	Risk Oversight and Management.....	17					Energy Affordability	68		
		Management of Climate-Related Risk and Climate Strategy	18					Energy Reliability	72		
		Climate-Related Metrics and Targets.....	25					Giving Back to Our Communities.....	73		



Glossary of Terms

Frequently used abbreviations, acronyms, or terms used in this report

National Fuel Gas Companies

Company – National Fuel Gas Company and its subsidiaries as appropriate in the context of the disclosure.

Distribution Corporation – National Fuel Gas Distribution Corporation

Downstream Segment – Downstream operations carried out by Distribution Corporation

Empire – Empire Pipeline, Inc.

Foundation – National Fuel Gas Company Foundation

Highland – Highland Field Services, LLC

Midstream Company – National Fuel Gas Midstream Company, LLC

Midstream Segment – Midstream operations carried out collectively by Supply Corporation, Empire and Midstream Company

National Fuel – National Fuel Gas Company

Seneca Resources – Seneca Resources Company, LLC

Supply Corporation – National Fuel Gas Supply Corporation

Upstream Segment – Upstream operations carried out by Seneca Resources

Regulatory Agencies

DCNR – Pennsylvania Department of Conservation and Natural Resources

DOT – United States Department of Transportation

EPA – United States Environmental Protection Agency

FERC – Federal Energy Regulatory Commission

NYNHP – New York Natural Heritage Program

NYPSC – New York Public Service Commission

NYSDEC – New York State Department of Environmental Conservation

PADEP – Pennsylvania Department of Environmental Protection

PAF&BC – Pennsylvania Fish and Boat Commission

PaPUC – Pennsylvania Public Utility Commission

PGC – Pennsylvania Game Commission

PHMSA – Pipeline and Hazardous Materials Safety Administration

OSHA – Occupational Health and Safety Administration

SEC – Securities and Exchange Commission

SHPO – State Historic Preservation Office

USACE – United States Army Corps of Engineers

USFWS – United States Fish and Wildlife Service

Other

AGA – American Gas Association

API – American Petroleum Institute

AXPC – The American Exploration and Production Council

Bbl – Barrel (of oil)

Bcf – Billion cubic feet (of natural gas)

Bcfe (Mcfe) – represents – The total heat value (Btu) of natural gas and oil expressed as a volume of natural gas.

Bcf (or Mcf) equivalent – The Company uses a conversion formula of 1 barrel of oil = 6Mcf of natural gas.

BMP – Best management practice

Capital expenditure – Represents additions to property, plant, and equipment, or the amount of money a company spends to buy capital assets or upgrade its existing capital assets.

CCAA – Nationwide Candidate Conservation Agreement with Assurances

CCUS – Carbon capture utilization and storage

CIP – Conservation Incentive Program

CISSC – Corporate Information Security Steering Committee

CLCPA – New York Climate Leadership and Community Protection Act, or Climate Act

Code – Company’s Code of Business Conduct

DIMP – Distribution Integrity Management Program

EDM – Engineering Design Manual

EHS – Environmental, health and safety

EIA – United States Energy Information Administration

ERM – Enterprise Risk Management

ESCAMP – Erosion and Sedimentation Control and Agricultural Mitigation Procedure

ESG – Environmental, social, and governance disclosures

GHG – Greenhouse Gas

GHGRP – United States EPA’s Greenhouse Gas Reporting Program

GRI – Global Reporting Initiative

HCA – High consequence area

IFC – International Finance Corporation

ILO – International Labor Organization

InfoSec – Information security

INGAA – Interstate Natural Gas Association of America

IPCC – Intergovernmental Panel on Climate Change

LIDAR – Light Detection and Ranging

LDAR – Leak Detection and Repair

LMI – Low-Moderate-Income Portfolio

MAOP – Maximum allowable operating pressure

MSC – Marcellus Shale Coalition

MMcf – One million cubic feet

NGSI – National Gas Sustainability Initiative

NMFR – Near-miss frequency rate

PNDI – Pennsylvania Natural Diversity Inventory

PNHP – Pennsylvania Natural Heritage Program

PSMS – Pipeline Safety Management Systems

PPE – Personal protective equipment

ROW – Right-of-way

RNG – Renewable Natural Gas

SASB – Sustainability Accounting Standards Board

SME – Subject Matter Expert

SMS – Safety Management System

STIMP – Storage Integrity Management Program

TCFD – Task Force on Climate-Related Financial Disclosures

TIMP – Transmission Pipeline Integrity Management Program Plan

TRIR – Total recordable incident rate

VOC – Volatile organic compound

WNA – Weather normalization adjustment

WEO – World Energy Outlook

Dear Stakeholders,

Thank you for your interest in National Fuel Gas Company’s 2024 Corporate Responsibility Report (“Report”). This Report builds on our previous disclosures, highlighting the Company’s continued efforts to safely, affordably, reliably, and sustainably produce, store, transport, and distribute natural gas. Across the Company, the work of our 2,350 dedicated employees is driven by our guiding principles of Safety, Environmental Stewardship, Community, Innovation, Satisfaction, and Transparency. With nearly 125 years of operating history, National Fuel remains committed to being a responsible corporate partner in the communities in which we live and work.

The energy landscape is evolving – furthering the importance of an all-of-the-above approach to energy policy.

In our operating territories and throughout the country, energy demand is increasing, with natural gas serving as a critical component of the evolving energy ecosystem. As has long been the case, particularly in the Northeast U.S., a majority of families and businesses rely on natural gas to cook, heat water, and warm their homes and workplaces. Further, the outlook for substantial growth in data center development, as well as the ongoing focus on building and vehicle electrification, is pushing energy demand to new heights. As the electric grid becomes increasingly stressed, we continue to see rising electricity prices and decreasing reliability. More than ever, dispatchable and reliable energy sources, like natural gas, are necessary to meet growing energy demand. Driven in part by increasing concerns about energy security, affordability, and reliability, our state and federal governments are increasingly supportive of natural gas’ critical role in the energy mix. National Fuel is ready to play the role it has played for more than a century, continuing to safely deliver affordable energy to customers, whenever they need it, all while maintaining its focus on supporting a sustainable future.

National Fuel is investing in a positive natural gas future.

Prioritizing Safety, Investing in Our People

Our highest priority is the safety of our customers, employees, contractors, and the communities we serve. Our Safety Management Systems and extensive safety and operational training programs reinforce this priority across all business segments. In 2024, we instituted operational safety days within our Downstream and Midstream segments. At these sessions, employees focused on essential safety topics, including emergency response procedures, damage prevention,

and overall hazard awareness. Our Upstream segment continued its impressive safety record for another year with no employee DART (days away, restricted or transferred) injuries, and continues to emphasize safe work practices with its contractors through annual site orientations, regular in-field safety interactions, and operational assessments and inspections.

We are also committed to the professional development of our workforce. In 2024, we launched the Empower Mentoring Program, which facilitates mentorship relationships across the Company. The program aims to help employees build their skills and improve cross-departmental communication. We also instituted our voluntary “Fuel for Success” training program, offering participants the opportunity to build essential career development skills through interactive workshops. These programs, along with other similar opportunities we offer, aim to improve our employees’ professional fulfillment, boost retention rates, and preserve institutional knowledge and skills.

I am proud of our Company’s well-established safety culture and the dedication of our employee groups across our integrated businesses, which allow us to continue to safely and reliably serve our customers.

Supporting our Communities

We continue to invest in our facilities and perfect our operational practices to ensure that National Fuel consistently delivers affordable and reliable energy supplies. In 2024, the Company maintained its long-standing focus on these key tenets, achieving nearly 100% reliability across each of our business segments. Our focus on reliability ensures that our customers and communities can rely on National Fuel to safely meet their energy needs, even during periods of severe winter weather. Along these lines, our Utility, which serves approximately 2 million residents, is dedicated to delivering natural gas and providing exceptional customer service throughout Western New York and northwestern Pennsylvania. We are proud that natural gas continues to be the most affordable source of energy in our service territories, and that our commitment to customer service is reflected in our strong performance in customer satisfaction rates across our jurisdictions, respectively.

Focusing on Environmental Stewardship

Ongoing investments in our facilities and operations have allowed National Fuel to reduce our environmental impact, including emissions, while enhancing the integrity and reliability of our assets. In addition to reducing emissions, National Fuel is committed to minimizing ecological impacts across the value chain.

In 2021, we announced 2030 emissions-intensity reduction targets for each of our business segments, and we are proud to report that our Exploration & Production and Gathering segments have already exceeded their targets. At the close of calendar year 2024, our Exploration & Production business had reduced its methane intensity by 58%, with our Gathering business reducing its methane intensity by 45%, both compared to a 2020 baseline. These businesses have also achieved peer-leading Responsible Energy Development Certifications. Our Pipeline & Storage and Utility segments are also making significant progress toward their emissions reduction targets, achieving reductions of 31% and 15%, respectively since 2020. As we continue to pursue this important initiative, we are consistently evaluating emissions reduction projects and technologies, with a focus on efficient deployment of capital and value-accretive investments.

Likewise, the Company embeds ecological protection considerations into all phases and aspects of our operations, working closely with a variety of key stakeholders to avoid disturbing sensitive or protected areas and mitigating environmental impacts, to the extent reasonably possible. Throughout projects, we implement water-management plans, monitor and implement practices to minimize erosion, and even enhance existing habitats. For example, National Fuel’s Pollinator Program exceeded our 2024 annual program acreage goal by 65% through conservation measures that support monarch butterflies and other pollinators on more than 5,000 acres of our rights-of-way.

As a Company headquartered in the heart of our operating footprint, National Fuel will continue to focus on its important role as a good corporate citizen within our communities. In addition to our continued philanthropic giving, we remain dedicated to supporting the communities where we operate and expanding

initiatives that allow our employees to participate and give back to their communities. We are looking forward to working with our stakeholders in the years ahead to meet the demand of the new energy landscape – safely, affordably, reliably, and sustainably.



David P. Bauer

David P. Bauer
President and Chief Executive Officer

Executive Summary

2024 Report Highlights6

Company Overview7

Our Guiding Principles8

Our Community and Stakeholder Engagement9

Corporate Responsibility Focus..... 10

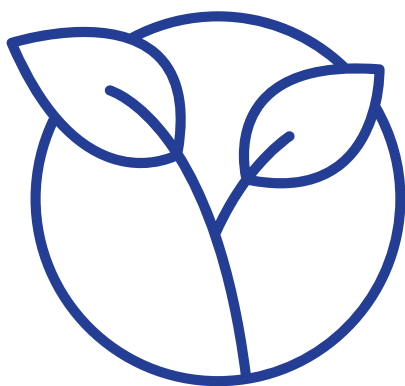
2024 Report Highlights

This Report provides discussion and analysis of National Fuel Gas Company’s (“National Fuel” or the “Company”) corporate responsibility and sustainability metrics, the Company’s management of those metrics, and the programs and policies in place to further National Fuel’s commitment to the safe and environmentally conscious operation of its business.¹ This Report includes updated disclosures from January 1 – December 31, 2024 and, as appropriate, significant developments that have occurred since the end of this reporting period.



Responsible Governance

- Earned an “AA” MSCI ESG rating
- Disclosures align with TCFD
- Disclosures align with SASB standards for all three segments
 - Downstream (Gas Utilities and Distributors)
 - Midstream (Oil & Gas – Midstream)
 - Upstream (Oil & Gas – Exploration & Production)



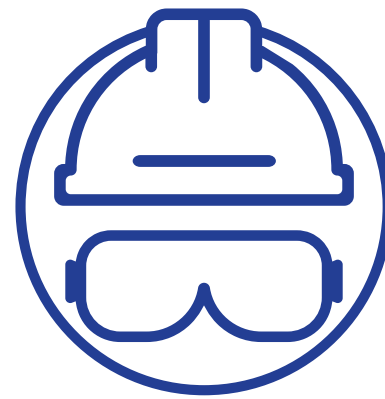
Environmental Stewardship

- 24.8% reduction in consolidated methane emissions since 2020
- Exploration & Production and Gathering business segments already achieved 2030 methane intensity targets
- Independent third-party verification of emissions data
- Continuing to prioritize emissions reduction projects that present the highest reduction-per-dollar invested
- Multiple programs aimed at restoring and enhancing biodiversity



Human Capital Management

- Town hall career conversations with independent directors
- Newly launched Empower Mentoring Program
- Continued focus on career and leadership development opportunities
- Prioritization of employee safety and wellness



Prioritizing Safety

- Continuous employee and contractor training and development programs drive safety culture
- More than 185,000 hours of safety and operational training
- Ongoing customer and community outreach and education
- Meetings held with more than 1,000 local emergency responders
- Safety management systems and robust compliance programs drive preparedness



Community Impacts




- Focus on local job creation and fueling regional growth
- Safety-focused training with local communities
- Corporate foundation grants funding community programs
- Employee charitable giving
- Community volunteer programs
- Days of Doing community service event

Company Overview

National Fuel Gas Company is a holding company organized under the laws of the state of New Jersey and headquartered in Western New York. The Company is a diversified energy company engaged principally in the onshore production, gathering, transportation, and distribution of natural gas.

The Company operates an integrated business, with assets centered in Western New York and northwestern Pennsylvania being used for, and benefiting from, the production and transportation of natural gas from the Appalachian Basin. Current natural gas development and production activities are focused in the Marcellus and Utica shales, geological shale formations that are present nearly a mile or more below the surface in the Appalachian region of the United States. Pipeline development activities are designed to gather, store, and transport natural gas production to new and existing markets.

The common geographic footprint of the Company's subsidiaries enables them to share certain management, labor, facilities, and support services across various businesses and pursue coordinated projects designed to produce and transport natural gas from the Appalachian Basin to markets in the eastern United States and Canada. The Company reports financial results for four business segments: Exploration & Production, Gathering, Pipeline and Storage, and Utility.

 Downstream	 Midstream	 Upstream
National Fuel Gas Distribution Corporation (“Distribution Corporation” or “Downstream Segment”), a New York corporation, carries out the Company’s Utility operations. Distribution Corporation provides natural gas utility services to approximately 754,000 customers through a local distribution system located in Western New York and northwestern Pennsylvania. The principal metropolitan areas served by Distribution Corporation include Buffalo, Niagara Falls, and Jamestown, New York and Erie and Sharon, Pennsylvania.	The Company’s Midstream operations are carried out by the Company’s Pipeline & Storage and Gathering subsidiaries (collectively the “Midstream Segment”). National Fuel Gas Supply Corporation (“Supply Corporation”), a Pennsylvania corporation, and Empire Pipeline, Inc. (“Empire”), a New York corporation, carry out the Company’s Pipeline & Storage operations. Supply Corporation and Empire provide interstate natural gas transportation and storage services through integrated gas pipeline systems in Pennsylvania and New York. Wholly-owned subsidiaries of National Fuel Gas Midstream Company, LLC (“Midstream Company”), a Pennsylvania limited liability company, carry out the Company’s Gathering operations. Through these subsidiaries, Midstream Company builds, owns, and operates natural gas gathering and compression facilities in Pennsylvania.	Seneca Resources Company, LLC (“Seneca”), a Pennsylvania limited liability company, carries out the Company’s Exploration & Production operations. Seneca is engaged in the exploration for, and the development and production of, natural gas in the Appalachian region of Pennsylvania.

Our Guiding Principles

National Fuel understands that to deliver long-term sustainable value for the benefit of our stakeholders – shareholders, employees, customers, and the communities where we operate – we must continue to conduct our business activities in a way that promotes our six guiding principles. These principles underpin all aspects of our operations, as well as our daily interactions with our stakeholders.

 <div>Safety</div>	 <div>Environmental Stewardship</div>	 <div>Community</div>	 <div>Innovation</div>	 <div>Satisfaction</div>	 <div>Transparency</div>
<p>We value the safety of all our customers, employees, and communities, and work diligently to establish a culture of safety that is embraced throughout the entire organization.</p>	<p>We highly prioritize environmental protection and conservation of resources. We utilize procedures, technologies, and best management practices across our businesses to develop, build, and operate our assets in a manner that respects and protects the environment.</p>	<p>We are committed to the health and vitality of the local communities where we operate. We work where we live and raise our families, and we are constantly focused on the highest standards of corporate responsibility and accountability.</p>	<p>We strive to exceed the standards for safe, clean, and reliable energy development, embracing new technologies and investing in the future of our regions' energy resources. We envision a long and healthy future for our Company.</p>	<p>We work to deliver reliable, high-quality service for our customers. We want our shareholders to see a strong return on their investment. We want our employees to work in a positive, safe, and rewarding environment. We want our communities to be proud to call us neighbors.</p>	<p>We believe that open communication is key to maintaining strong relationships. We see value in educating our shareholders, employees, customers, and communities about all aspects of our business.</p>

Our Stakeholder Engagement

	Our Customers	Our Vendors	Our Employees	Our Investors	Our Regulators	Our Communities
Topics	<ul style="list-style-type: none">• Safety• Affordability and reliability• Environmental stewardship• Special assistance programs	<ul style="list-style-type: none">• Financial and operational performance• Safety and training• Compliance and reporting• Anti-corruption• Supplier Code of Conduct Policy• Labor and Human Rights Policy	<ul style="list-style-type: none">• Safety, health, and wellbeing• Compensation and benefits• Employee handbook policies• Code of Business Conduct and Ethics• Environmental stewardship• Recruitment and retention• Workforce training, development, and leadership opportunities• Financial performance• Information security and data privacy	<ul style="list-style-type: none">• Financial performance• Executive compensation• Board composition• Business strategy and operations• Industry trends and developments• Institutional and retail shareholder considerations• Climate/sustainability• Human capital• Credit and ESG ratings agencies• Proxy advisory firms	<ul style="list-style-type: none">• Compliance, coordination, and cooperation• Safety• Affordability and reliability• Environmental impacts• Project routing and planning• Public policy	<ul style="list-style-type: none">• Economic development and impact• Safety outreach• Hiring and job creation• Affordability and reliability• Environmental stewardship• Education• Municipal planning and permitting• Landowner relations• Pipeline safety information
Engagement Methods	<ul style="list-style-type: none">• Safety campaigns• Website and customer portal• Online presence and social media• Locally staffed call center• Press releases• Emails and direct mail	<ul style="list-style-type: none">• Competitive bidding process• Website and dedicated business partner page• Direct mail and online posting of policies• Safety meetings• Ethics hotline• Contractor meetings/trainings	<ul style="list-style-type: none">• Employee portal• Training events• Performance reviews• Annual career development discussions with leadership team• Employee engagement surveys• Employee resource groups• Senior management email newsletters• Ethics hotline• Corporate conferences and town halls	<ul style="list-style-type: none">• Earnings calls and presentations• Annual shareholder meetings• Industry/investor conferences• Analyst meetings• News releases• Investor relations websites• Company proxy, reports, and disclosures• Shareholder services	<ul style="list-style-type: none">• Proactive and regular outreach• Engagement with local tribal officials, government officials, and community leaders• National Fuel point-of-contact system• Public meetings• Corporate lobbying efforts• Participation in rulemaking process through filed comments• Industry and trade associations• Regulatory filings	<ul style="list-style-type: none">• National Fuel Gas Company Foundation and online grant applications• Charitable giving programs• Volunteer programs and service events• Press releases• Online presence and social media• First responder and municipal safety trainings and outreach• Direct mail



Corporate Responsibility Focus

Safe

National Fuel's number one priority is the safety of our customers, employees, contractors, and communities. We continuously focus on system integrity, making natural gas a safe, viable option for our customers.

- Emergency preparedness and response programs
- Prioritize asset integrity with safety management systems and compliance programs
- Employee and contractor training and development
- Customer outreach and education

Learn more about our Safety Programs detailed in this report.

Reliable

Given our weather-hardened infrastructure, natural gas remains a reliable and resilient option for our customers at all times of the year.

- Near 100% service reliability in both Downstream and Midstream Segments
- Strategic planning and coordination to minimize weather-related production interruptions in Upstream Segment

Learn more about our Reliability detailed in this report.

Affordable

Natural gas remains the most affordable energy source within our service territories for residential customers.

- End-use customers benefit from Appalachian shale development and its impact on the availability and affordability of natural gas in the region
- Utility's 2024 residential delivery gas rates amongst the lowest in the northeastern United States

Learn more about our Affordability detailed in this report.

Sustainable

We believe natural gas will continue to play a critical role in the energy ecosystem as part of an all-of-the-above energy future. National Fuel is committed to developing responsibly sourced gas, maintaining a safe and sustainable system, and pursuing responsible GHG emissions reduction initiatives.

- Ongoing sustainability initiatives drive significant progress towards our methane intensity emissions reduction targets
- Procedures to minimize ecological impacts and conservation programs to enhance local habitats

Learn more about our Sustainability detailed in this report.

Governance

Board Diversity and Independence.....

Investment Community Engagement.....

Leadership and Business Ethics

Advocacy

Information Security

Governance of Corporate Responsibility,
Sustainability, and Climate Risk

Risk Oversight and Management

Management of Climate-Related Risk
and Climate Strategy.....

Climate-Related Metrics and Targets

12

12

13

14

15

16

17

18

25

Strong Corporate Governance Practices

Our Experienced and Independent Board of Directors

The Company's Board of Directors is composed of individuals with diverse and extensive leadership experience in the energy sector and other complementary industries and professions. The Company believes it is important for the composition of the Board to reflect a diversity of experiences and perspectives relating primarily, but not exclusively, to the Company's business segments and operating footprints.



Our Approach to Engagement with Investment Community Stakeholders

National Fuel believes that continued engagement with stakeholders is key to maintaining positive relationships and strong corporate governance practices.

Members of the Company's management team engage with shareholders and proxy advisory firms throughout the year to obtain feedback on matters of interest, including corporate responsibility and sustainability matters. The Board has also directed management to continue to engage as appropriate with interested shareholders and to inform the Board of requests for meetings with its members.

Board Composition

- ✓ 91% Independent
- ✓ Designated Lead Independent Director
- ✓ Annual election of all Directors
- ✓ Separate roles of Chairman of the Board and Chief Executive Officer



We regularly engage with investment community stakeholders...

- Institutional Investors
- Retail Shareholders
- Proxy Advisory Firms
- Rating Agencies

...on important operational, strategic, and sustainability topics...

- Business Strategy and Operations
- Key Industry Developments
- Board Composition
- Executive Compensation
- Corporate Responsibility

...through various forms of communication...

- Investor Meetings
- Industry/Analyst Conferences
- Quarterly Earnings Calls
- Investor Relations Website
- Annual Shareholder Meeting
- Periodic Company Reports and Publications

...driving further discussion and understanding.

- Board and Company management value and consider shareholder feedback
- Engagement allows the Company to address stakeholder comments and further enhance its disclosures and initiatives, where appropriate

¹ The graph reflects the current makeup of the Company's Board of Directors as of September 1, 2025. In accordance with the NYSE Listed Company Manual, the Company does not consider a director independent if he or she is, or has been within the last three years, employed as an executive officer of the Company.

Leadership and Governance – Business Ethics

We seek to promote and maintain a culture committed to high standards of ethical conduct and integrity. The Company communicates its expectations for responsible and ethical conduct through our Code of Business Conduct and Ethics (the Code), which is applicable to the Company’s directors, officers, and employees. The Code is designed to deter wrongdoing, promote honest and ethical conduct, and reinforce compliance obligations.

Managing Business Ethics Internally

The Company’s internal Ethics Committee, chaired by the Company’s General Counsel, administers the Code as it relates to Company employees who are not executive officers and regularly reports on its activities to the Audit Committee. The Audit Committee is responsible for administering the Code as it relates to the Company’s directors and executive officers. Additionally, the Audit Committee monitors compliance with the Company’s Code and reviews management’s response to violations of the Code. Discipline may be imposed for violations including termination of the offending individual’s relationship and/or employment with the Company.

All Company employees share the responsibility for making ethical conduct central to our business operations and dealings. The Company’s Employee Handbook Policy explains what is expected of all employees to comply with the Code and outlines Company policies relating to compliance with laws, rules, and regulations.

Employee Handbook Ethics Topics:

- Improper corporate payments, including bribes, kickbacks, and gifts
- Political contributions
- Equal employment opportunity
- Non-discrimination and anti-harassment
- Health and safety
- Environmental compliance
- Business records/record retention

Additionally, on an annual basis, National Fuel takes various steps to ensure compliance with the Code:

- **Employee annual ethics disclosure:** Officers and supervisory employees are required to provide a personal statement of disclosure relating to any conflicts of interest and any known occurrences of fraud.
- **Availability of anonymous toll-free hotline and dedicated website:** Officers and employees may use the Company’s toll-free hotline or dedicated website to anonymously report suspected wrongdoings, possible conflicts of interest, or fraud. In 2024, the hotline received only six reports related to the hotline’s intended purpose. We carefully investigated each report and determined that there were no ethical violations. Still, we implemented minor process improvements in some cases.
- **Employee ethics and compliance training:** The Company requires employees to undergo ethics and compliance training for business dealings with government officials and business partners. The training provides examples of actions that could constitute bribery, corruption, and fraud.



Managing Business Ethics with Our Business Partners

The Company expects its business partners to comply with the standards of conduct set forth in the Code, the [Company’s Supplier Code of Conduct Policy](#), [National Fuel’s Labor & Human Rights Policy](#), and contractual obligations to National Fuel. The regulated segments send a [Supplier Ethics Letter](#) to vendors, suppliers, and contractors highlighting the Code, the standards therein, and the Company’s expectation that vendors are aware of and comply with those standards (the “Supplier Ethics Letter”). The letter also outlines for suppliers the Company’s expectations for National Fuel employees in dealing with external business partners, namely that they are restricted from:

- Using their position as a National Fuel representative for personal gain through preferential treatment of vendors, suppliers, or contractors;
- Placing themselves in a position that compromises their integrity or represents a conflict between their personal interests and National Fuel’s interests; or
- Requiring vendors, suppliers, or contractors to participate in or support any group, activity, political campaign, or organizations as a requirement of doing business with National Fuel.

The Supplier Code of Conduct Policy communicates to our business partners the Company’s expectations that they conduct business with integrity and ensure that their employees, workers, representatives, and subcontractors do the same. Among other things, this policy addresses the Company’s expectations with respect to the following:

- Business conduct and ethics
- Anti-corruption
- Non-discrimination and protection of classes
- Labor practices and employment practices
- Information security, privacy, and data protection
- Safe, secure, and healthy workplaces
- Environmental practices
- Compliance and reporting violations

Advocacy

The Company is committed to maintaining the highest ethical standards when engaging in political activity. As the natural gas industry is highly regulated at the local, state, and federal levels, the decisions made by policymakers can directly impact various aspects of the Company's operations. National Fuel advocates for policies that benefit our customers, employees, shareholders, and the communities we serve. We believe our participation in the political process serves all of our stakeholders' interests by creating a more informed policy-making process. National Fuel's [Political Activities Principles](#) further address the Company's political contributions program, the Company's political action committees and lobbying activities, membership in organizations, political expenditures, and trade/business association expenditures, including dues allocated to lobbying.

Fundamental Principles

National Fuel's participation in the political process is guided by a set of fundamental principles that govern our corporate policies on lobbying, political spending, and engagement in the political process:

- The Company will engage with government officials at all levels to advocate for and promote public policies and legislation that support the interests of our customers, employees, shareholders, and the communities in which we operate and serve.
- The Company will comply with all applicable federal, state, and local laws governing the political process and has established policies, procedures, and training to ensure such compliance.
- Any political expenditures, whether they are direct corporate contributions or made by our employees' political action committee, will reflect the Company's interests and culture.
- No political contributions will be given directly or indirectly to public officials in exchange for any official act.

Utility employees install a natural gas meter set at the site of the Buffalo Bills' new Highmark Stadium to support double the gas usage of the previous stadium, fuel games on a new grass field, and keep the fans warm.



NATURAL GAS CHAMPIONS

Launched Natural Gas Champions to Educate All Employees Regarding Energy Landscape

Every person in the United States relies on energy, although information about energy sources and policies is not always accessible or digestible. We launched Natural Gas Champions to help bridge this education gap for our employees and their communities.

Our employees live in our operating footprint and have a personal stake in protecting their energy security. Like their neighbors, they use natural gas in their own homes and depend on its safety, reliability, and affordability, especially in our cold climate.

Natural Gas Champions empowers employees with the information they need to educate and advocate for themselves and their communities to use natural gas as a reliable and essential energy source. The Natural Gas Champions Playbook is accessible to all employees and includes fact sheets, videos, and interactive trainings.

Information Security

National Fuel believes that strong information security is critical to the Company’s success and is therefore committed to continuously reevaluating and strengthening the Company’s data privacy and cybersecurity posture. To fulfill this commitment, the Corporate Information Security Steering Committee (“CISSC”) meets quarterly to discuss emerging information security risks and the Company’s corresponding mitigation and defense efforts. Led by the Company’s Chief Information Officer (“CIO”) and Chief Information Security Officer (“CISO”), the CISSC is comprised of Information Security (InfoSec) professionals, leadership from key departments, and the Company’s senior management. The Company’s CISO regularly provides information security updates to the Board. Information security risks are also identified and assessed as part of the Company’s enterprise risk management program, which the Board is briefed on quarterly.

National Fuel’s Information Security Program is aligned to the Cybersecurity Framework published by the National Institute of Standards and Technology. The InfoSec team is dedicated to promoting security awareness through personnel training and regularly reviewing internal information security policies, monitoring for anomalous behavior, investigating potential security events, mitigating vulnerabilities, and assisting business partners with the goal of providing secure and resilient systems. The InfoSec team meets weekly with key Information Technology and Operation Technology leadership to discuss potential cybersecurity threats and review alerts.

National Fuel periodically reevaluates its Information Security Program to assess whether planned initiatives are appropriate and to ensure that risk mitigation and defense efforts remain robust.



Company Initiatives for the Information Security Program

Training & Internal Policies	External Audits	Information Security Breaches
<ul style="list-style-type: none">• All employees and contractors with access to Company systems complete, at a minimum, information security training at least once per year• InfoSec provides additional training to high-value targets• InfoSec reviews and updates Company information security and device policies regularly• Employees are provided with comprehensive information security awareness resources including security awareness training through simulated phishing emails, cyber-risk announcements, targeted ‘bite-sized’ cyber training sessions, and active participation in National Cybersecurity Awareness Month• The Board receives periodic and as-needed updates on cyber threats and trends	<ul style="list-style-type: none">• The Company annually engages multiple independent cybersecurity vendors to perform assessments on all aspects of the Information Security program• InfoSec voluntarily participates in one-off assessments focused on different information security issues performed by various U.S. federal and state agencies:<ul style="list-style-type: none">— Cybersecurity and Infrastructure Security Agency— Transportation Security Administration— Department of Homeland Security— Federal Energy Regulatory Commission— New York Public Service Commission— Pennsylvania Public Utility Commission	<ul style="list-style-type: none">• InfoSec performs ongoing comprehensive investigations of our systems, and to the best of our knowledge, the Company has not experienced an information security breach to any of our systems• InfoSec maintains contracted relationships with forensic investigation, crisis communications, credit monitoring, and legal service providers in the event of a breach• InfoSec conducts annual tabletop exercises to test our Information Security Incident Response Plan and Procedures• The Company maintains cybersecurity liability insurance



Governance of Corporate Responsibility, Sustainability, and Climate Risk

The Board's structure and responsibilities are outlined in the Company's [Corporate Governance Guidelines](#). Individual committees offer expertise and oversight on specific corporate responsibility factors.

Nominating/Corporate Governance Committee	Compensation Committee	Audit Committee
Oversight Responsibilities: <ul style="list-style-type: none">• Corporate governance principles• Corporate responsibility and sustainability (standing agenda item at Committee meetings)• Board composition and diversity• Board evaluations	Oversight Responsibilities: <ul style="list-style-type: none">• Compensation philosophy and practices• Executive compensation tied to corporate responsibility and sustainability metrics	Oversight Responsibilities: <ul style="list-style-type: none">• Financial statement integrity• Internal control systems• Audit processes and annual risk-based audit plan• Enterprise Risk Management (ERM) process; includes climate-related risks¹• Review Code of Business Conduct and Ethics
Number of Meetings: 4²	Number of Meetings: 5²	Number of Meetings: 9²
 100% Independent³	 100% Independent³	 100% Independent³

Oversight for corporate responsibility and sustainability flows from the Nominating/Corporate Governance Committee of the Board to our CEO and President and throughout the Company via our Corporate Responsibility Executive Committee, of which the CEO is Chair. The Executive Committee is made up of the Company's senior executive team.

¹ The ERM process is reviewed quarterly during the Audit Committee meetings, which all directors are invited to attend. However, the entire Board of Directors maintain oversight and responsibility of enterprise risks.
² Reflects number of meetings held during fiscal year 2024. Each Committee met on a quarterly or more basis, at meetings which are typically attended by the entire Board.
³ All members of the Nominating/Corporate Governance, Compensation and Audit Committees are independent, as independence is defined in NYSE listing standards.

Our Governance of Corporate Responsibility

Nominating/Corporate Governance Committee
Oversees and provides guidance on corporate responsibility and sustainability initiatives, strategies, and decision-making.



Corporate Responsibility Executive Committee
Responsible for implementation and development of corporate responsibility and sustainability strategies. Participates in the enterprise risk management process.



Corporate Responsibility Officer
Executive responsible for corporate responsibility disclosure and advancing the Company's corporate responsibility priorities.



Corporate Responsibility Management Committee
Responsible for prioritizing progression of corporate responsibility and sustainability priorities in specific subject matter expert areas, as well as updating Company disclosures.

Our Enterprise Risk Management Framework

Critical Risks and Potentially Emerging Risks are rated within an ERM matrix according to the following criteria:

- **Likelihood:** Measures how likely a risk will occur within the risk assessment period with current controls and mitigation measures in place.
- **Severity:** Measures how significant the risk impact is to the Company (primarily considers financial impact and reputational risk).

Critical Risks:

- Risks with a high severity in the 1-year or 5-year assessment (regardless of likelihood); or
- Risks that have a sustained likelihood of occurrence in the 1-year and 5-year assessment (regardless of severity).

Foundational Risks: Key risks that the Company constantly monitors and mitigates.

Potentially Emerging Risks:

- Risks with a low severity and likelihood in the 1-year and 5-year assessments; or
- Risks that have a sustained low severity in the 1-year or 5-year assessments.

Major Risk Categories



Short-Term
Risks (1 Year)

Medium-Term
Risks (5 Years)

Long-Term
Risks (20 Years)

Risk Oversight and Risk Management

The Board maintains close oversight of the assessment and mitigation of risks facing the Company. Through an Enterprise Risk Management (ERM) process, the Company identifies key “foundational risks” and, among five major risk categories, specific “critical” and “potentially emerging” risks. The Board routinely assesses these risks, along with any newly identified risks, on a quarterly basis at the Audit Committee meetings. These meetings are typically attended by the entire Board. In addition, management provides a detailed presentation on a topic related to one or more risk categories at each quarterly board meeting. Additional review or reporting on enterprise risks is conducted as needed or as requested by the Board.

The ERM process informs all aspects of Company business planning and execution. Further, the Board directs management to integrate corporate responsibility considerations into decision-making throughout the organization. The Audit Services Department, reporting to the Audit Committee, considers significant risk categories identified through the ERM process when creating its internal annual audit plan.

To facilitate the ERM process, an internal ERM team, reporting to the General Counsel, regularly confers with business unit officers, managers, and subject matter experts to identify risks, provide initial risk assessments, and review previously-identified risks. The team’s findings and recommendations are then brought before senior management for further analysis. Risks are ranked based on likelihood of occurrence and severity of impact. Each identified risk is assessed on a 1-year, 5-year, and 20-year basis.

Foundational risks are the key risks that the Company constantly monitors and mitigates. These risks are typically known, stable, and routine and are managed through established controls. Critical risks could have a significant impact on the Company’s business objectives if not managed properly. Potentially emerging risks are novel or developing risks that are not yet fully understood or quantified. They may arise from external changes such as technology or economic shifts or from consumer or regulatory changes that are not yet fully known.

Based on this analysis, the senior management team assesses the significance of the identified risks to the Company. For those identified as critical risks, the ERM team provides to the Board a more detailed narrative, outstanding items of interest taken into consideration when assessing that risk, and the current mitigation measures for that risk.

Our senior management team is responsible for reviewing the application of the Company’s ERM process and for reviewing the effectiveness of corporate strategy in prioritizing, addressing, and mitigating critical risks, including climate risks. Business unit leaders are responsible for ensuring compliance with current risk management plans and considering and developing, where warranted, additional mitigative measures for critical risks.

Risk Management – Business Continuity Planning

National Fuel maintains a robust business continuity program to ensure the Company can respond effectively to a crisis. A comprehensive Incident Management Plan and an interdepartmental Incident Management Team support the program.

The team proactively tests the plan annually to verify the Company’s readiness to respond to natural disasters or large-scale pipeline or information technology system events. In 2024, the team conducted an in-depth simulation of, and response to, a realistic information technology and pipeline system incident. When simulating its response to this scenario, the team addressed critical topics, including but not limited to: operational priorities; recovery operations; coordinating with various stakeholders including customers, emergency responders, law enforcement, and regulatory agencies; pipeline system safety and reliability; and internal and external communications.

The team identified opportunities for improvement during the simulation to further strengthen National Fuel’s ability to respond to a major incident in accordance with our guiding principles.

Management of Climate-Related Risk and Climate Strategy

The Company has elected to implement the recommendations of the Task Force on Climate-Related Financial Disclosures (TCFD), aligning our climate-related risk reporting with the four central themes of the TCFD – Governance, Strategy, Risk Management, and Metrics and Targets. In furtherance of these efforts, in 2022, the Company published its [Climate Report](#), which highlighted the resilience of its operations to potential risks associated with climate change. Overall, the Company continues to take important steps to minimize our carbon footprint through efficient operation of our system while offering a reliable and affordable energy source that plays a meaningful role in the ongoing energy evolution.

Climate Risk Assessment

The Company recognizes the ongoing developments and risks surrounding climate change, as well as the opportunities in energy transition and modernization. The Board and management consider these risks and opportunities and their corresponding impacts on the organization's businesses and strategy through the ERM program, strategic planning process, and capital spending decision process. When evaluating the impact of climate-related risks, the Company considers short-, medium-, and long-term horizons and whether the identified risks could have a financial impact on the Company within those time horizons.

Climate-Related Risks and Potential Impacts

The Company considers climate-related risks as part of its ERM process, which ultimately informs corporate strategy and the capital spending decision process. The TCFD identifies two categories of climate-related risks – physical risks and transitional risks. Given the Company's weather-hardened infrastructure and geographic location, our comprehensive review of future climate-related physical risks indicated that there is low financial exposure to the Company.

Climate-Related Physical Risks

Risk Category	Risk	Potential Impacts
Acute	<ul style="list-style-type: none">• More frequent and severe weather events	<ul style="list-style-type: none">• Business interruption or system shutdown leading to reduced margins• Increased costs from operational damage• Increased insurance premiums
Chronic	<ul style="list-style-type: none">• Long-term shift in climate patterns resulting in new storm patterns or chronic increased temperature	<ul style="list-style-type: none">• Increased pricing volatility due to changing weather patterns• Supply chain disruption

Climate-Related Transitional Risks

Risk Category	Risk	Potential Impacts
Policy and Legal (Legislation, regulation, and litigation)	<ul style="list-style-type: none">• Regulatory and legislative initiatives• Carbon fees and cap-and-trade programs• Lack of support for system modernization• More stringent emissions regulations or regulatory changes requiring major system remediation or changes in operating practices• Revisions to federal statutes, laws, or policies related to the drilling or completion of natural gas wells• Political risks associated with climate pledges• Regional or statewide natural gas bans• Limited geographic footprint• Ban on hydraulic fracturing or increased permitting/operating requirements• Increased permitting requirements surrounding water usage and management for production operations• Increased government subsidies for alternative energy sources	<ul style="list-style-type: none">• Increased costs and reduced revenue from reduction in consumer demand based on incremental costs for usage• Negative rate case results• Increased costs for system investment without rate recovery• Lower throughput/demand for natural gas• Production curtailment and related revenue impacts• Decreased revenues• Inability to recover financial investment in assets• Limited pool of potential investors to finance growth• Reduced access to and increased cost of capital• Increased insurance premiums• Increased shareholder activism leading to higher costs• Prolonged project timelines and increased construction costs• Limited growth opportunities• Impact on share price
Technology (Improvements or innovations that support decarbonization)	<ul style="list-style-type: none">• Decreased natural gas demand due to renewable energy adoption/technology developments	
Markets (Shifts in supply and demand for fossil fuels)	<ul style="list-style-type: none">• Shifts in supply and demand for natural gas	
Reputation (Changes in customer and community perceptions and behaviors)	<ul style="list-style-type: none">• Investors shifting away from carbon-intensive industries• Financial counterparty restrictions for carbon-intensive companies• Increased opposition to new projects/facilities• Employee attraction and retention• Litigation and lobbying aimed against carbon-intensive companies	



Medium-Term Transitional Risks

- **Policy and Regulatory Changes:** Regulatory changes at the federal, state, and/or local levels could reduce support for system modernization or introduce new requirements intended to reduce emissions for new and existing facilities. Emission-reduction requirements often require facility modifications, which increase our capital needs and operating costs, thereby restricting our existing operations.
- **Project Opposition:** Opposition during the project/facilities planning phase, or during or after construction, could limit growth opportunities if projects become difficult to construct due to prolonged timelines and increased construction costs.
- **Decreased Demand for Natural Gas:** Demand for natural gas could decrease because of renewable energy adoption and subsidization, which could lead to decreased margins or the inability to recover the Company’s financial investment in assets.

Long-Term Transitional Risks

- **Policy and Regulatory Changes:** Evolving federal, state, and local statutory and/or regulatory approaches could negatively impact the Company’s ability to grow or maintain its operations and assets. Potential developments could include regional or statewide bans on natural gas, including bans on the installation of new natural gas equipment and facilities; increased restrictions on certain operating practices; and cap-and trade, severance tax, and/or carbon tax implementation.
- **Financial Counterparty Restrictions for Carbon-Intensive Industries:** Access to, and cost of, capital could be negatively impacted due to limitations and restrictions on sources of funding, or insurer divestment from carbon-intensive industries could lead to increased insurance premiums.
- **Project Opposition:** (see Medium -Term Risks)
- **Decreased Demand:** (see Medium -Term Risks)

Management of Regulatory Risks

As part of the risk identification process, the Company identifies legislative and regulatory risks that could impact the Company financially. The Company’s businesses are subject to regulations under a wide variety of federal, state and local laws, including regulations and policies related to environmental impacts and climate change. Existing statutes and regulations may be revised or reinterpreted and new laws and regulations may be adopted or become applicable to the Company, which may affect the Company’s operations and financial results in ways that are difficult to predict. The natural gas industry’s operations are subject to an increasingly rigorous regulatory regime with respect to environmental and ecological impacts. The Company regularly reviews and evaluates the impacts that these legislative and regulatory changes and trends may have on our business segments.

- **New York:** The Company has heavily-regulated operations and facilities for both its Downstream Segment and Midstream Segment in New York.
 - **New York’s Climate Act:** The Act which created emissions reduction and electric generation mandates, and authorized regulatory actions, could impact the Downstream Segment’s customer base and create greater challenges in the development of natural gas infrastructure. New York State enacted legislation that includes a natural gas ban for certain new construction beginning in 2026.
 - **Process to Develop New York Cap-and-Invest Program:** New York regulators are in the process of developing a cap-and-invest program, which aims to achieve the goals of the Climate Act through the assessment of a fee per metric ton of greenhouse gas emitted from certain facilities and operations. The Company is actively engaged in this process as to potential impacts on its customers and business.
- **Pennsylvania:** Methane reduction framework for the oil and gas industry has resulted in permitting changes with the stated goal of reducing methane emissions from well sites, compressor stations, and pipelines.

- **Federal:** The Company has long been subject to an array of federal regulations focused on environmental impacts. In recent years, there was a significant increase in regulatory changes focused on strengthening environmental regulations and updating emissions standards and sources. These changes caused the Company to reassess certain operating practices, prioritization of projects, and impacts to emissions profile. While the current federal administration has expressed a goal to roll back or revise some of these initiatives, most remain in place today.
 - **EPA Methane Rule:** Applies to the Company’s Midstream and Upstream Segments. New, modified, and reconstructed facilities required to comply with, among other things, monitoring and emissions standards for certain equipment, increased leak detection and repair requirements and replacement of certain equipment. States are required to enact similar provisions for existing facilities within the next five years.
 - **Updated EPA Greenhouse Gas Reporting Program (GHGRP) Rules:** Applies to all Company Segments. Requires operators to revise calculations, record-keeping, and reporting of greenhouse gas emissions through updated methodologies and new and updated source emission factors (became effective this calendar year and will be reflected in next year’s Corporate Responsibility Report for 2025 emissions).

Legislation or regulation that aims to reduce emissions could also include GHG emissions limits and reporting requirements, carbon taxes, restrictive permitting, increased energy efficiency standards and incentives or mandates to conserve energy or use renewable energy sources.

National Fuel proactively manages evolving environmental and regulatory risks to ensure compliance, protect operations, and support a responsible energy future.



Identification and Evaluation of Climate-Related Opportunities

Natural gas has played a pivotal role in driving significant reductions in regional and national GHG emissions over the past decade. The Company believes that natural gas will remain an important part of the future energy solution as the regional and national focus remains on reducing emissions, improving energy security, and providing reliable and affordable energy.

We believe that there will be a long-term need for natural gas, particularly gas extracted from the Appalachian Basin, which has a lower carbon intensity than gas from other U.S. basins. We expect natural gas to continue to meet the energy needs of industrial and residential customers. For consumers in cold weather regions, such as Western New York and Pennsylvania, natural gas' reliability and affordability make it a fuel of choice for end-users. We also anticipate that natural gas will play a long-term role complementing other energy sources. It provides a readily dispatchable and reliable energy source during periods when intermittent energy is unable to meet energy demand or is otherwise unavailable. Even as we anticipate a continued role for natural gas, our energy transition teams are preparing for a more significant shift to a low-carbon economy by assessing alternative-energy business models.



Identified Opportunities under the TCFD Framework

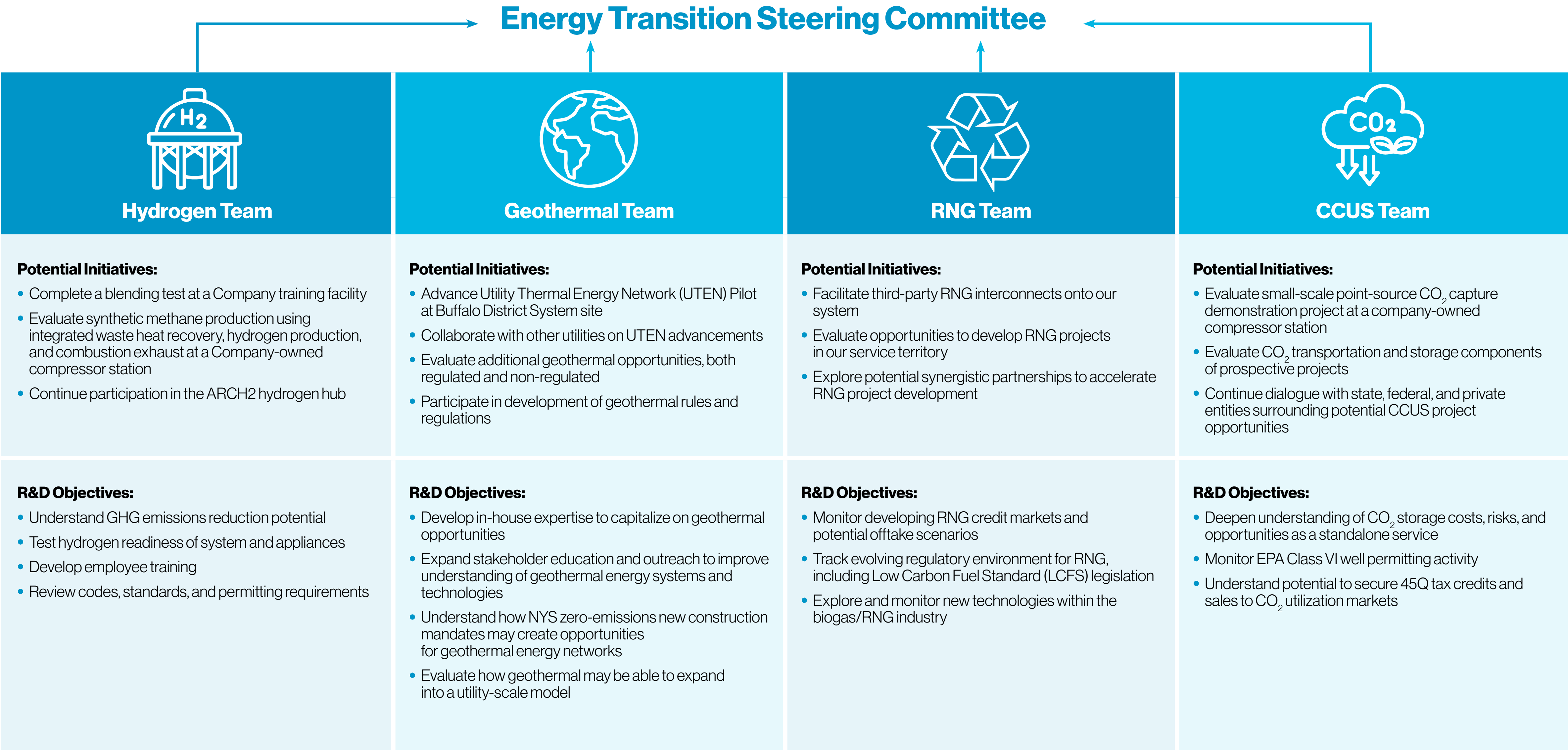
TCFD Category	Climate-Related Opportunities
Resource Efficiency	<ul style="list-style-type: none">• Modernize existing equipment to minimize emissions• Install low-emissions technology on new facilities• Maximize recycling of produced water• Promote customer efficiency• Use more efficient distribution and production processes
Energy Source	<ul style="list-style-type: none">• Leverage alternative energy sources and efficiency initiatives to reduce the Company's energy usage
Products and Services	<ul style="list-style-type: none">• Leverage existing systems to efficiently meet growing energy demand and support sustainable expansion• Leverage our existing infrastructure expertise to develop RNG production facilities• Explore leveraging existing infrastructure to transport alternative low-carbon and no-carbon fuel sources, such as RNG and hydrogen• Explore CCUS opportunities
Markets	<ul style="list-style-type: none">• Access to markets seeking responsibly sourced natural gas production
Resilience	<ul style="list-style-type: none">• Improved efficiencies for natural gas development and gathering operations within contiguous acreage position

Energy Transition Steering Committee

The Company's Energy Transition Steering Committee looks for business development opportunities related to low- and zero-carbon fuel sources, as well as projects with the potential to reduce the Company's emission profile. The Steering Committee is made up of various members of the Company's senior management team.

The Company has also developed specific teams made up of technical, regulatory, and business development subject matter experts focused on Hydrogen, Carbon Capture Utilization and Storage (CCUS), RNG, and Geothermal. Each team reports up to the Energy Transition Steering Committee, which is tasked with reviewing the team's progress, establishing next steps, and providing direction on time and resource allocation that will best position the Company for the future.

The potential impact of these climate-related opportunities include operational efficiencies resulting in increased revenue and lower costs, greater access to capital at a lower cost due to the Company's reduced carbon footprint, and increased revenues, earnings, and cash flows driven by execution of business development opportunities. Evolving legislative and regulatory frameworks have created uncertainty and complexity surrounding potential initiatives. Each team monitors the legislative and regulatory landscape that could ultimately impact team initiatives or investment.





Evaluating our Resilience to Climate Risk

Physical Risk Analysis

Similar to its review of climate risks, the Company completed a review of future physical risks from climate-driven hazards across Upstream, Midstream, and Downstream assets in its portfolio, as detailed in the Company’s [Climate Report](#). The Company conducted a physical risk assessment with two climate scenarios, in alignment with TCFD recommendations:

- **Business-as-usual scenario:** Society follows a regional rivalry trend with competition among regions, low technological advancement, and high challenges to both adaptations and mitigations. Global temperature increases are held below 4°C by 2100.
- **Optimistic and attainable scenario:** The world follows a sustainable path with low challenges to mitigations or adaptations. Global temperature increases are held below 2°C by 2100.

Physical Climate Hazards

Acute	Chronic
<ul style="list-style-type: none">• Flooding• Landslides• Hurricanes• Wildfires	<ul style="list-style-type: none">• Extreme heat• Extreme cold• Water stress & drought

Geographic location and weather-hardened infrastructure mean low potential for financial risk from physical climate hazards.

To further understand the mid- and long-term physical risks, the Company reviewed the 30-year average risks under both scenarios at two time horizons: 2030 and 2050. Both acute hazards and chronic hazards were evaluated under each scenario and at each time horizon. The analysis calculated the indicative financial risks due to direct damage or business interruptions from these future climate driven hazards. This comprehensive review of future physical risks from climate-driven hazards across critical assets indicated that there is relatively low financial risk from climate hazards to our facilities and operations. This is largely due to the location of our assets, coupled with the fact that much of our infrastructure is designed to withstand severe weather.

Transitional Risk Analysis

In connection with the publication of the Company’s [Climate Report](#), National Fuel retained ERM, an independent third party consultant, to conduct a climate scenario analysis across all segments of its business, including a lower than 2°C scenario (“Sustainable Development Scenario”). For the purposes of this analysis, National Fuel utilized future energy market scenarios developed by the International Energy Agency (IEA) to test the resiliency of the Company’s assets and operations against potential future climate-related transitional risks. Each scenario assumed a different set of policy changes, as well as market trends (demand), energy efficiencies, and technology advancements.

Downstream Segment’s Long-Term Plan and Scenario Analysis

As part of the NYPSC’s Gas System Planning Proceeding, our New York Utility submitted its Long-Term Plan (LTP) in July 2023, which was formally implemented via an order from the NYPSC in December 2023. Our approach advocates for a balanced solution to reduce GHG emissions while ensuring that our customers’ energy remains safe, reliable, and affordable. Additionally, our regulators’ support for the plan demonstrated their constructive view of natural gas and the approach we share in developing a long-term solution to responsibly reduce emissions. As drafted, the LTP is projected to reduce emissions by 40% by 2043 when compared to the Reference Case and by 53% when compared to 1990 levels. The LTP outlines a gradual increase in emissions reduction targets, allowing for significant contributions toward New York’s decarbonization goals through an “all-of-the-above” approach to energy policy.

Sensitivity of Reserve Levels to Scenarios that Account for a Price on Carbon Emissions

Seneca reviewed sensitivities to its reported fiscal 2024 year-end reserves utilizing U.S. natural gas pricing for three different scenarios outlined in the 2024 World Energy Outlook (“WEO”) Report – the Announced Pledges, Stated Policies, and Net-Zero Emissions by 2050 scenarios. The WEO Announced Pledges Scenario reflects all the current global climate policy commitments and targets and assumes these goals are met in full within the intended target timeline. The WEO Stated Policies Scenario reflects policy settings that are in place or have been announced but only incorporates those items that are underpinned by adequate provisions for their implementation. The WEO Net Zero Emissions by 2050 Scenario examines a pathway to net-zero emissions for the global energy sector consistent with minimizing global temperature rise to 1.5 °C. It also meets the key energy-related UN Sustainable Development Goals, including achieving universal access to modern energy services by 2030 and securing major improvements in air quality.

Seneca reviewed the impact of natural gas prices included in the WEO Report “Wholesale fossil fuel prices by scenario” table on its fiscal 2024 reported reserves. All associated operating costs and capital inputs assumed in calculating Seneca’s SEC-reported reserves were held constant for the WEO scenarios. Based on the above assumptions, Seneca calculated net fiscal year 2024 reserves for the three WEO Report policy scenarios. The pricing shown in each of the WEO Report Scenarios would not be expected to have a negative impact on Seneca’s reported fiscal 2024 reserves due to low operating costs and SEC pricing that is at or below the WEO pricing scenarios.

Prices by Scenario (source WEO 2024)

		Stated Policies		Announced Pledges		Net Zero Emissions by 2050	
Natural Gas (USD/MBtu)	2023	2030	2050	2030	2050	2030	2050
United States	\$2.70	\$3.90	\$4.20	\$3.20	\$2.90	\$2.10	\$2.00

Fiscal year 2024 reported net reserves would remain at approximately 4.8 TCFE under all three of the WEO Report scenarios.



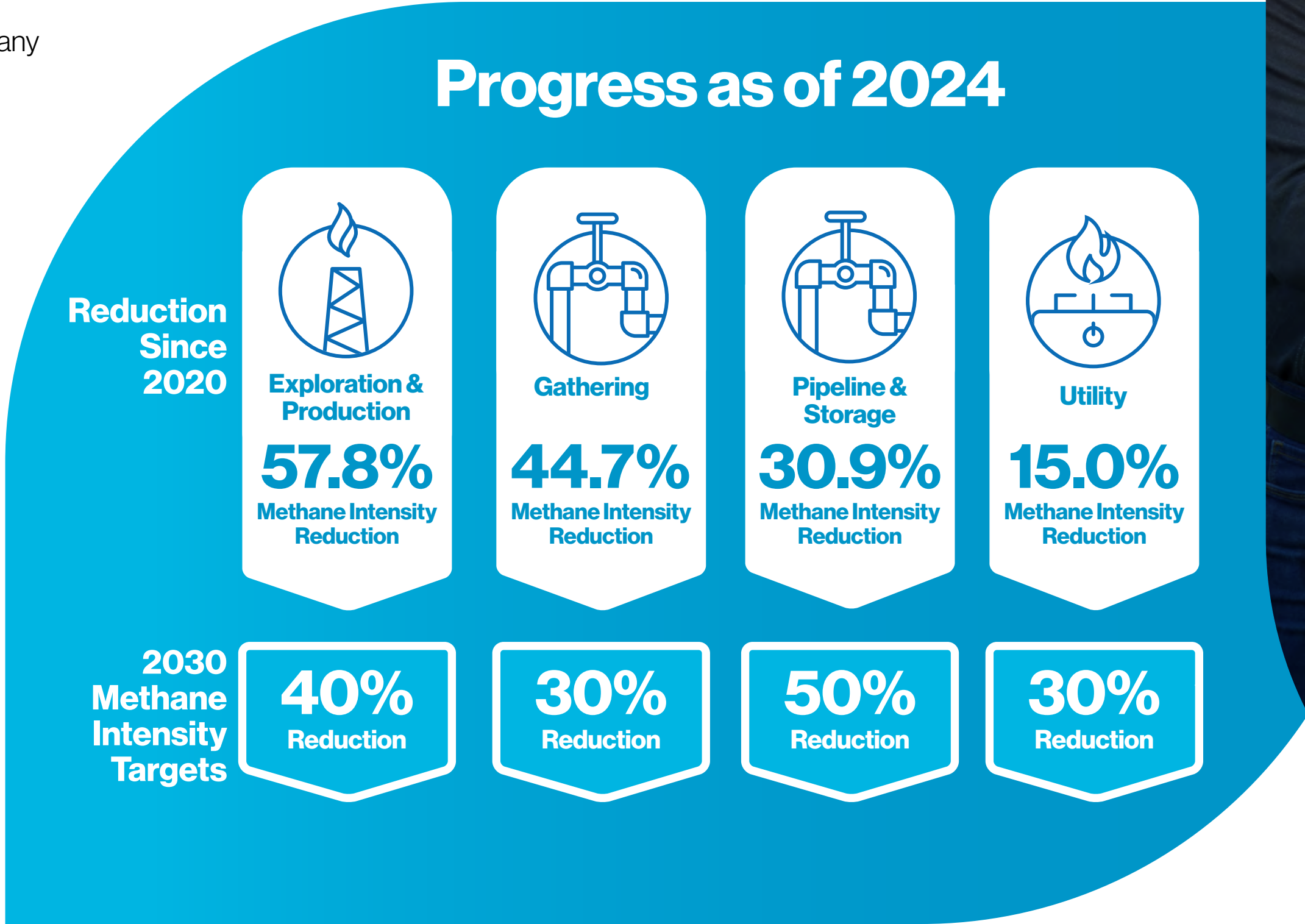
Climate-Related Metrics and Targets

In connection with the Company’s ongoing sustainability efforts, the Company evaluated key metrics and developed targets to measure and monitor its progress in managing GHG and methane emissions. National Fuel has established targets on a consolidated basis and at the segment level: a corporate-level Scope 1 & 2 GHG emissions reduction target (2020 baseline) and segment-level Scope 1 & 2 methane emissions intensity targets (2020 baselines). Additionally, the Utility set Scope 1 reduction targets for delivery system emissions (1990 baseline). Through the risk management process, the Company identified these metrics as the most useful in managing climate-related risks and established corresponding targets to further our emissions reduction strategy:

- Methane Intensity Reduction Targets for each of our businesses
- GHG Emissions Reduction Target for the consolidated Company
- Utility Delivery System GHG Emissions Targets
 - 75% reduction by 2030
 - 90% reduction by 2050

The Company has made significant progress against its various methane intensity targets since 2020, driven by emissions mitigation projects, successful implementation of best management practices (BMPs), and continued system modernization. Given recent EPA regulatory changes in emissions reporting, including updated factors for some existing sources, the Company expects that in future reporting years, our calculations associated with the assigned baseline year and progress towards these targets may change.¹ More information pertaining to the Company’s programs that are driving our progress to limit emissions can be found in the [Environmental – Greenhouse Gas Emissions](#) disclosure.

At the corporate level, the Company’s goal is to reduce GHG emissions 25% by 2030. We have made progress toward our consolidated GHG emissions reduction target, **with a 9.9% total GHG emissions reduction**, despite the significant growth of our Midstream Segment pipeline businesses in recent years and an increase in our natural gas production.² In future years, we plan to build on our emission-reduction efforts through continued system modernization and implementation of available technologies, as well as evaluation of pilot projects as new technologies become commercially available. Additionally, the Company has **reduced its total consolidated methane emissions 24.8%** since 2020. Our continued focus on constructing efficient and low-carbon-intensity facilities and systems, while also improving emissions reductions of our existing operations, has allowed the Company to reduce methane emissions and limit total GHG emissions while meaningfully growing our business.



1 The updated EPA GHGRP rules also included addition of new emissions sources, some of which the Company has already included in its emissions reporting in previous years.
2 Consolidated GHG emissions reduction goal does not include Highland Field Services, LLC.

Environmental

Embracing Environmental Stewardship

Greenhouse Gas Emissions

Air Quality

Ecological Impacts and Biodiversity Protection

Water Management and Integrity

Waste Management

27

28

34

36

43

44

Embracing Environmental Stewardship

Across our organization, National Fuel remains driven by our guiding principle of Environmental Stewardship.

This includes focusing our efforts on reducing our emissions, exploring new technologies, minimizing our impacts on biodiversity, prioritizing restoration, creating robust waste management practices, and maintaining continuous compliance with local, state, and federal laws and regulations.

Natural gas will continue to play a critical role in the energy ecosystem as part of an all-of-the-above energy future. We have taken significant steps to reduce our emissions through further system modernization, best management practices, and embracing new and emerging technologies. Both our Exploration & Production and Gathering segments have already surpassed their 2030 methane intensity reduction targets.

Committed to Reducing Our Emissions

- Segment Level Methane Intensity Reduction Targets
- Consolidated Greenhouse Gas Reduction Target
- Continued Downstream and Midstream Segment System Modernization
- Seneca and Midstream Company Responsible Gas Certifications
- Fleet Vehicle Idle Tracking Program
- Natural Gas Pneumatic Device Conversions
- Minimizing Pipeline Blowdowns and Operational Venting
- Piloting Technologies Focused on Emissions Reduction
- Executive Compensation tied to Emissions Reduction Efforts

Since 2020, we've reduced our emissions while growing our business

Consolidated Methane Emissions
24.8% Reduction

Consolidated GHG Emissions
9.9% Reduction



Supporting Environmental Stewardship



- **Our Environmental Policy Statement** reinforces the Company's commitment to integrate environmental protections across all segment operations.
- **Equitable Origin Certifications** achieved for Seneca and Midstream Company assets reflect the Company's commitment to responsible energy development.
- **MiQ Methane Emissions Performance Certification** achieved at Seneca demonstrates its responsible natural gas production focused on abating methane emissions and monitoring technology deployments.
- **Biodiversity Enhancement and Conservation** efforts reflect our focus on creating and improving habitats through restoration efforts and minimizing impacts to ecologically sensitive areas.
- **Upstream Water Management** focuses on responsibly managing water assets used in operations through water quality assessments, containment practices, and the recycling of over 90% of Seneca's produced fluids.
- **Corporate Waste Management Programs** reflect comprehensive plans to ensure the proper management, storage, handling, and disposal of waste.

Greenhouse Gas Emissions

For nearly 125 years, National Fuel and its employees have been committed to operating safely and responsibly in our local communities. We understand the vital role we play in upholding standards of environmental protection across all areas of our operations. In 2021, each of our business segments announced methane emissions intensity targets. National Fuel has continued our ongoing sustainability initiatives, driving significant progress across businesses, with two segments already surpassing their 2030 methane intensity reduction targets. The Company will continue to evaluate and prioritize emissions reduction projects and technologies that deliver the highest impact per dollar invested, creating optimal environmental returns on capital deployed.

Progress Towards 2030 Emissions Reduction Targets and Ongoing Initiatives

	2030 Emissions Reduction Targets	Progress Against 2020 Baseline ¹	Ongoing Sustainability Initiatives
Exploration & Production	40% Reduction in Methane Intensity	57.8% Reduction	<ul style="list-style-type: none">Emphasizing initiatives that are scored for responsible gas certificationsConverting pneumatic devicesMaintaining updated BMPs for well liquids unloading and flowback
Gathering	30% Reduction in Methane Intensity	44.7% Reduction	<ul style="list-style-type: none">Converting natural gas pumps and pneumatic devicesUpgrading engines to cut combustion emissionsEnhancing fugitive emissions monitoring program
Pipeline & Storage	50% Reduction in Methane Intensity	30.9% Reduction	<ul style="list-style-type: none">Installing recovery systems to capture and minimize venting from blowdowns and compressor sealsConverting natural gas pump and pneumatic devicesReplacing and repairing isolation vents/valvesUpgrading engines to cut combustion emissionsEnhancing fugitive emissions monitoring program
Utility	30% Reduction in Methane Intensity	15.0% Reduction	<ul style="list-style-type: none">Investing in system modernization through replacement of mains and servicesExpanding supply of renewable natural gas and responsibly sourced gas in systems to offset traditional gasExploring hydrogen blending projectsReducing leak backlogEvaluating non-pipe alternatives
Consolidated Corporate Goal	25% Reduction in GHG Emissions	9.9% Consolidated GHG Reduction	<ul style="list-style-type: none">Driven by initiatives listed above

¹ Recent revisions of Subpart W emissions factors, effective for 2025 reporting, will change the reported baseline, 2025 emissions profile, and progress against these targets.

Consolidated Greenhouse Gas and Methane Emissions

The Company continues to measure and monitor its progress in managing greenhouse gas and methane emissions. Additional historical emissions information, as well as emissions information broken down by subsidiary, is provided in the appendices.

Scope 1 Greenhouse Gas Emissions (Metric Tons CO ₂ e) ¹			2024
Total Downstream Segment	EPA Mandatory Reporting ²		217,491
	Additional EPA Sources ³		941
	Other Sources ⁴		95,080
	Total Downstream Segment		313,512
Total Midstream Segment	EPA Mandatory Reporting ⁵		815,971
	Additional EPA Sources ⁶		159,348
	Other Sources ⁷		16,192
	Total Midstream Segment		991,511
Total Upstream Segment	EPA Mandatory Reporting ⁸		152,675
	Other Sources ⁹		50,621
	Total Upstream Segment ¹⁰		203,296

Scope 1 Methane Emissions (Metric Tons CH ₄ as CO ₂ e)			2024
Total Downstream Segment	EPA Mandatory Reporting ²		217,222
	Additional EPA Sources ³		941
	Other Sources ⁴		86,172
	Total Downstream Segment		304,335
Total Midstream Segment	EPA Mandatory Reporting ⁵		193,650
	Additional EPA Sources ⁶		109,857
	Other Sources ⁷		13,074
	Total Midstream Segment		316,581
Total Upstream Segment	EPA Mandatory Reporting ⁸		61,417
	Other Sources ⁹		22,687
	Total Upstream Segment ¹⁰		84,104

Scope 2 Greenhouse Gas Emissions (Metric Tons CO ₂ e)	2024
Total Downstream Segment	992
Total Midstream Segment	4,596
Total Upstream Segment ¹⁰	672

1 CO₂e values calculated in accordance with the published 100-year time horizon global warming potential (GWP) values from the IPCC Fifth Assessment Report (AR5, 2014) as preferred by SASB.

2 Emissions subject to the Greenhouse Gas Mandatory Reporting program (40 CFR Part 98, Subpart W) include mains, services, M&R stations, and large combustion units in the natural gas distribution segment (LDCs).

3 Includes emissions from: 1) Distribution Corporation – owned transmission pipeline and gathering segments that are subject to Subpart W, but do not meet the reporting threshold, 2) blowdown emissions from the transmission pipeline segment, and 3) in the gathering segment, emissions from blowdowns, dehydrator vents and equipment leaks.

4 Includes emissions from sources not subject to EPA reporting. Sources include customer meters, pressure relief valves, blowdowns (LDC), dig-ins, pipeline leaks (transmission), small combustion units, fleet and natural gas space heating.

5 Emissions as reported under EPA GHG Reporting Rule Subpart W. Facilities with actual GHG emissions greater than 25,000 metric tons of CO₂e (i.e., GHGRP reporting threshold) are subject to EPA monitoring and reporting of GHG emissions.

6 EPA Part 98 sources that do not reach minimum threshold to mandate annual reporting. Emissions are calculated using the same methodologies as EPA.

7 Other sources included by NGSi and ONE Future, along with fleet and office buildings.

8 Emissions as reported under EPA GHG Reporting Rule Subpart W, with the exception of the source category "Well Venting for Liquids Unloading," which utilized the Pennsylvania Unconventional Natural Gas Emission Inventory.

9 Other Sources include sources identified under NGSi, fleet, office and small sources that do not meet EPA Subpart W Reporting requirements as well as Produced Water Tanks that were calculated using the updated Subpart W methodology.

10 Upstream data does not include Highland Field Services. Emissions information for Highland Field Services is provided in the appendix.

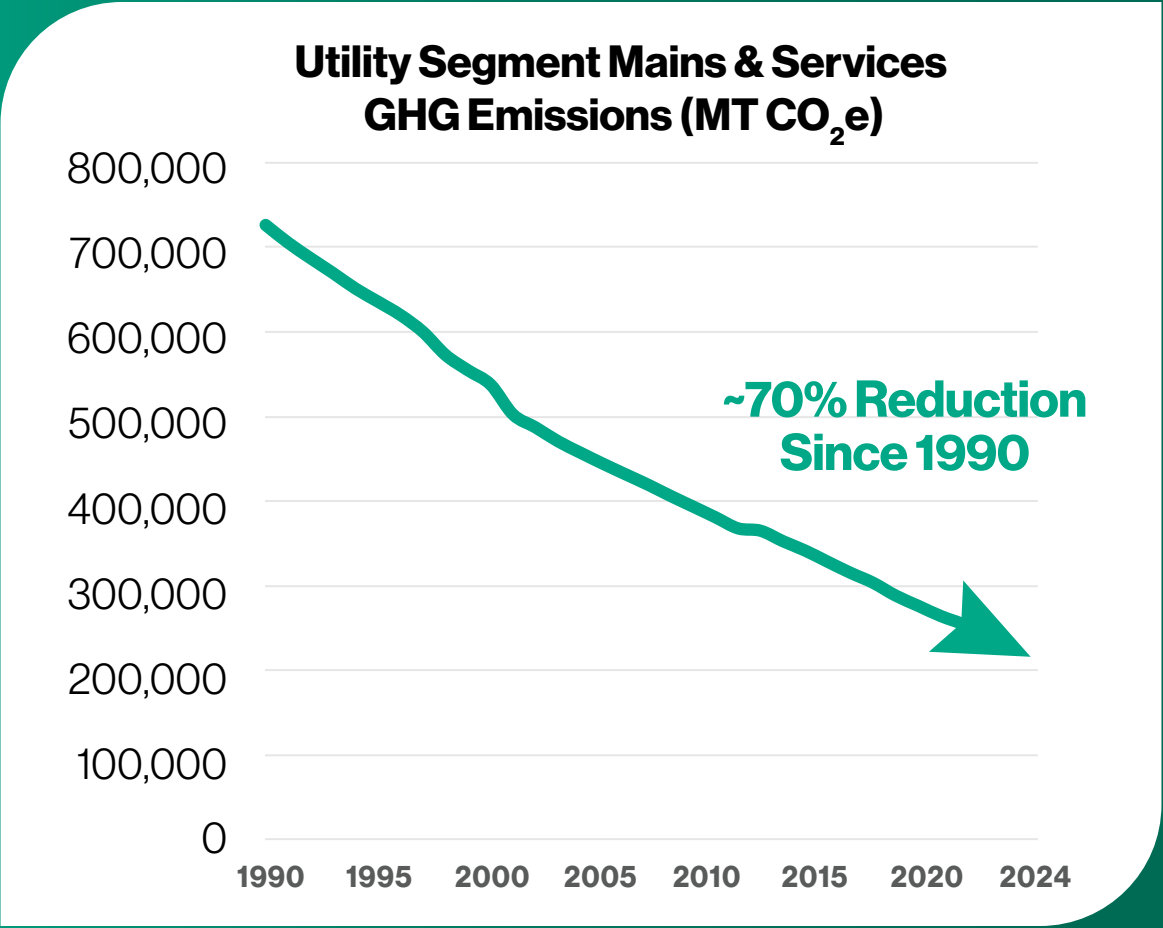
11 Baseline emissions and emissions reduction target for Scope 1 emissions are calculated pursuant to the reporting methodology as of 2024 under the U.S. EPA's GHG Reporting Program (Subpart W), primarily Distribution pipeline mains and services. Revisions of Subpart W emissions factors, effective for 2025 reporting, will change the reported baseline, 2025 emissions profile, and progress against these targets.

System Modernization Drives Progress Toward Utility GHG Emissions Reduction Targets

In 2021, the Utility Segment set GHG emissions reduction targets of 75% by 2030, and 90% by 2050, from 1990 levels for its distribution system. The Utility's progress is being primarily driven by ongoing system modernization, including the continued replacement of older-vintage mains and services.¹¹

Recent accomplishments include:

- Replacing or retiring cast/wrought iron and non-cathodically protected steel mains at an average rate of 6.9% per year from 2020 to 2024.
- Reducing inventory of non-cathodically protected steel mains by 10.0% and cast/wrought iron mains by 7.2%. The overall reduction of these facilities was 9.6% in 2024.
- Removing the last known piece of cast iron pipeline from operation in 2023.



Drivers of Emissions Reduction Efforts

National Fuel is committed to reducing greenhouse gas and methane emissions. We continue to employ best-in-class emissions practices to reduce the emissions intensity of our operations, including improved operational practices, technological enhancements, and data collection.

Emissions-Reducing Operational Practices Across Segments	
Minimizing Pipeline Blowdowns (Downstream and Midstream Segments)	Leveraging maintenance schedules, implementing improved operational practices, and having more robust data collection.
Fugitive Emissions Monitoring (All Segments)	Implementing regular fugitive emissions inspections utilizing an array of approaches, including audible, visual, and olfactory (AVO) techniques, optical gas imaging (OGI) equipment, and alternative EPA-approved methods for the detection and mitigation of fugitive emissions.
Vent Gas Recovery Systems (Midstream Segment)	Installing and using Vent Gas Recovery (VGR) systems to capture gas that would otherwise vent to the atmosphere.
Natural Gas Pneumatic Device and Pump Conversion/Replacement (Midstream and Upstream Segments)	Converting natural gas-driven pneumatic devices and pumps to utilize compressed air/electric/nitrogen systems and installing and using natural gas capture devices that recycle vented gas for beneficial reuse.
Well Emission Mitigation (Upstream Segment)	Implementing process changes and immediate separator use to eliminate venting methane to the atmosphere during well turn-on (“flowback”). Utilizing pressure builds and deploying mobile compressor units to mitigate venting during well liquids unloading.
Compression Operations Minimization of Venting (Midstream Segment)	Developing and implementing best management practices to reduce venting.
Control Systems and Operating Techniques (Midstream Segment)	Incorporating modern station and unit controls into compressor facilities, resulting in fewer unit starts/stops at select facilities and therefore fewer compressor unit blowdowns.
System Modernization (Downstream and Midstream Segments)	Investing in system modernization, including continued replacement of older vintage mains and services, reduces leaks while maximizing safety and reliability.

Technology and Data Collection

The Company evaluates and pilots various technologies to determine the most sustainable and capital-efficient emissions reduction methods. Emissions data is collected and analyzed to develop a comprehensive understanding of emissions sources, strategies for mitigation, and project costs.

Downstream Segment	<ul style="list-style-type: none">Accelerated leak surveys guided by new software that targets facilities with a higher potential to leak.Program that digitally tracks time vehicles spend (in hours) idling to provide data and encourage employees to decrease fleet idling time while in the field.
Midstream Segment	<ul style="list-style-type: none">Converting natural gas pneumatic devices and/or pumps to utilize air/electric systems.Commenced VGR projects to capture and recover natural gas from centrifugal compressor dry gas seals, compressor rod packing, and planned pipeline and compressor blowdown events.Working with original equipment manufacturers to upgrade engines to reduce methane emissions from combustion.Mitigating fugitive methane emissions at transmission and storage compressor stations by targeting specific leak sources such as compressor unit isolation and blowdown valve leakage.Utilization of improved software technologies.
Upstream Segment	<ul style="list-style-type: none">Joined the Appalachian Methane Initiative (AMI). This coalition is comprised of U.S. natural gas companies and aims to utilize aerial monitoring technologies to detect and quantify methane emissions across the Appalachian Basin.Developed an internal control framework to ensure the completeness and accuracy of reported emissions.Transitioned three well pads to solar-powered pneumatics, which are zero-emissions pads during optimal conditions and allow Seneca to expand its knowledge of how solar power may be utilized in future applications.

Responsibly Sourced Gas Designations

Seneca and Midstream Company have achieved responsibly sourced gas designations to differentiate our production and gathering operations and to provide independent, credible verification of our corporate responsibility-related policies, procedures, and practices.



Equitable Origin is a comprehensive standard for assessing governance, social, and environmental performance during energy development.

EO100™ Standard for Responsible Energy Development Certification

100% of natural gas production certified in 2024

- Encompasses the following principles:
- Corporate Governance, Transparency & Ethics
 - Human Rights, Social Impacts & Community Development
 - Indigenous People's Rights
 - Fair Labor & Working Conditions
 - Climate Change, Biodiversity & Environment

Achieved Peer-Leading Certification

Seneca	Midstream
A	A-

In 2023, Midstream Company became the first gathering or midstream company to certify all its assets, demonstrating leadership in the field and commitment to responsible energy development. In October 2024, Midstream was re-certified and was recognized as the first entity in the EO100™ framework to improve two grades following initial certification.



The MiQ Standard is an independent framework that certifies natural gas according to its methane emissions performance during production. The standard serves as a credible way to differentiate natural gas production based on methane emissions, company practices to abate emissions, and monitoring technology deployment.

Methane Emissions Performance Certification

100% Appalachian Assets, recertified August 2025

Certification focuses on three emissions management criteria:

- Methane Intensity
- Company Practices to Manage Methane Emissions
- Emissions Monitoring Technology Deployment

Seneca Achieved

A

Grade Certification

The highest certification level available

Appalachian Methane Initiative

Seneca joined the Appalachian Methane Initiative (AMI) in late 2023 and took part in the 2024 and 2025 monitoring programs. AMI is a coalition of operators committed to detecting, measuring, quantifying, and mitigating methane emissions across the Appalachian Basin.

In 2024, over 15,000 aerial surveys of oil and gas facilities, as well as other sources including coal mines and landfills, were conducted to detect and measure methane emissions. Independent researchers and scientists from the Energy Emissions Modeling and Data Lab (EEMDL), a consortium of leading methane emissions experts from the University of Texas at Austin, Colorado State University, and Colorado School of Mines, independently reviewed and modeled the data collected from the aerial surveys.

The Appalachian Methane Initiative 2024 Campaign showed that the average methane emission intensity across all surveyed AMI production and midstream facilities was 0.064% and 0.099%, respectively. These results are consistent with other studies indicating that the Appalachian Basin is the lowest emitting major oil- and gas-producing basin in the US. All findings from the study can be found in the full AMI report: [Appalachian Methane Initiative \(AMI\) — CEESA](#)





Scope 1 Emissions from Source Categories¹

Midstream Segment

For our Midstream Segment, the largest contribution to CO₂e emissions is from combustion sources, primarily carbon dioxide from compressor engines. Our Midstream Segment utilizes various mitigation strategies to minimize those emissions, such as upgrading engines to options with improved combustion technologies where it is feasible. We are continuing to evaluate the environmental benefits and the technical and economic feasibility of multiple technologies for consideration in the future.

The next largest source categories contributing to overall GHG emissions are fugitive emission sources (including component leaks, compressor seal/rod packing, venting and compressor unit isolation, and blowdown valve leakage) and then vented emission sources (which include, among other things, pneumatic devices and blowdowns). The Midstream Segment is committed to transitioning from traditional gas-driven pneumatic devices to air systems and continues to dedicate resources to support this initiative. In addition, in 2024, the Company commenced and completed a number of VGR projects to capture and recover natural gas from dry gas seals and planned compressor blowdown events. Furthermore, the Midstream Segment is also actively refining a valve maintenance and replacement program aimed at minimizing leaks from isolation and blowdown valves.

Scope 1 Greenhouse Gas Emissions by Source Category (Metric Tons CO ₂ e)	2024
Combustion Sources	670,237
Fugitive Emissions	158,735
Vented Emissions	135,358
Process Emissions	14,470
Flared Hydrocarbons	12,711
Total Midstream Segment	991,511

Upstream Segment

Seneca continues to look for opportunities to reduce emissions through the implementation of best management practices, technology, and enhanced methane detection protocols.

- Seneca implemented a strategy for the management of liquid unloading practices, which reduced vented emissions from liquid unloading by 84% from 2023 to 2024. The strategy combined operational best practices with the deployment of well liquid unloading mobile compressors.
- Building on the success of our liquid unloading practices, Seneca is piloting various gas lift projects to optimize production and further reduce emissions.
- Seneca utilizes ventless flowback practices which mitigate methane emissions during the initial turn-on of a well.
- Seneca has made significant progress on the retrofit/replacement program for natural gas pneumatic devices, completing 66% of devices by the end of 2024.
- To ensure a safe work environment and comply with regulatory requirements, a minimal level of operational flaring is essential in nearly all gas operations. To comply with New Source Performance Standards (NSPS) Quad Ob requirements, Seneca installed vapor destruction units, with EPA-certified 98% destruction efficiency, on certain produced water tanks. Although vapor destruction units are a form of control for vented methane emissions, they are reported under the flare category in EPA reporting and as flared hydrocarbons in this report. Flared hydrocarbon emissions are minimal and only account for ~1% of Seneca's total Scope 1 GHG emissions.²

Scope 1 Greenhouse Gas Emissions by Source Category (Metric Tons CO ₂ e)	2024
Combustion Sources	119,351
Vented Emissions	78,322
Flared Hydrocarbons ³	2,211
Process Emissions	1,737
Fugitive Emissions	1,675
Total Upstream Segment	203,296

¹ Disclosures surrounding flared hydrocarbons and source emissions categories are not SASB metrics for utilities, which is why the Downstream Segment is not represented.
² The World Bank Group's Zero Routine Flaring by 2030 Initiative pertains to routine flaring at oil production facilities; the limited flaring Seneca reports does not meet this definition of routine flaring.
³ To mitigate vented emissions, Seneca has utilized a temporary non-routine flare to combust methane rather than vent. The emissions associated with this form of controlling vented methane is accounted for under the Flare category.

Leveraging Partnerships

National Fuel proudly partners with non-profit organizations and industry trade associations to improve our safety, environmental awareness, and commitment to protecting our communities and the environment. We utilize expertise and resources from each partner or coalition to further develop our understanding of available technologies, industry best practices, and challenges that lie ahead.

	Coalition of natural gas companies spanning the value chain that are working to voluntarily reduce methane emissions through shared best practices and technologies.
	Coalition of upstream and midstream peers working to enhance methane monitoring and emissions reductions throughout the Appalachian Basin.
	Trade association that identifies and addresses critical matters related to the development, construction, operation, and maintenance of natural gas infrastructure value chain through engagement, outreach, and research via the INGAA Foundation.
	Coalition of oil and natural gas companies committed to implementing best practices to minimize emissions.
	Coalition of upstream and midstream companies working to address issues regarding the production of job-creating American natural gas from the Marcellus and Utica shale plays.
	National trade association that educates and advocates for responsible upstream development and constructive federal solutions with policymakers, industry partners, and the media.
	Trade association representing utilities that promotes innovation, infrastructure modernization, and advanced technologies to reduce greenhouse gas emissions while maintaining safe, reliable, resilient, and affordable energy service.



Air Quality¹

National Fuel has a robust air quality control, management, and improvement program, with dedicated resources available to ensure that controls are in place and monitored. As part of our air quality compliance program, we are required to calculate and report emissions from stationary and fugitive emissions sources at operating facilities that meet specified reporting criteria, which varies by state.

Midstream Segment

Emissions are calculated using the best available data in accordance with agency guidelines and accepted methods, which include, but are not limited to:

- Records of source operating hours, fuel consumption, and other key operating parameters (e.g., throughput, temperature, pressure, etc.)
- Site-specific analyses and stack test results
- Emissions modeling software (e.g., GRI-GLYCalc, TankESP, ProMax, etc.)
- Published emission factors (e.g., Manufacturer, AP-42, 40 CFR 98 Subpart W)
- Records of leaks discovered and leak duration
- Site specific pneumatic inventories

Reported criteria pollutants include all Midstream Segment compressor stations, Pennsylvania defined wellsite locations, and other select facilities with stationary sources (e.g., interconnects with engines or dehydration units) in Pennsylvania and New York. Emissions from fleet vehicles are also included.

Midstream Segment Criteria Pollutants (Metric Tons)	2024
NO _x	646
SO _x	9
VOC	257
PM ₁₀	29

Upstream Segment

Seneca has implemented internal controls to ensure the accuracy and completeness of its emissions profile and continues to perform aerial flyovers and collaborate with the EEMDL team to:

- Develop facility-level, measurement-informed emissions inventory estimates that integrate measurement data with operational information to improve accuracy.
- Reconcile emissions estimates derived from top-down and bottom-up measurement approaches.
- Reconcile measurement-informed emissions inventory with operator-reported emissions inventory estimates (e.g., EPA greenhouse gas reporting program).

In 2024, Seneca reviewed and updated its calculation methodology for produced water tanks by using ProMax to calculate emissions. This change aligns with new Subpart W revisions and NSPS Quad Ob potential to emit determinations for this source category. Based on the updated profile results and to fulfill NSPS

Quad Ob compliance requirements, Seneca installed EPA-certified 98% destruction efficiency vapor destruction units on some of its produced water tanks to help minimize methane emissions.

Upstream Segment Criteria Pollutants ² (Metric Tons)	2024
NO _x	311
SO _x	1
VOC	53
PM ₁₀	11

Efforts to Reduce Criteria Pollutants

Midstream and Upstream Segments

- **Fuel Optimization:** Combustion sources and methods are reviewed to eliminate, reduce, or substitute fuels for lower-emission options, such as replacing diesel for natural gas or solar.
- **Engine Performance Monitoring and Testing:** A third-party stack testing company monitors and tests certain compressor engines (either on a defined interval basis or based on utilization) for certain pollutants in the engine's exhaust, which helps ensure the engines meet performance specifications and permit requirements. Where possible, Seneca has used Tier 4 engines instead of Tier 2 engines if the site requires diesel power. Tier 4 engines have much stricter emissions controls which reduce PM₁₀ and NO_x emissions.
- **Engine Replacements and/or upgrades (Midstream Segment Only):** Existing internal combustion engines are being replaced with lower emissions models or modified to reduce emissions.
- **System Modernization (Midstream Segment Only):** Periodic evaluation of system to replace older assets with lower emission technology.
- **Utilization and Alternative Hydrate Inhibitors:** The operational need for and injection quantity of hydrate inhibitors (methanol) is monitored on a routine basis. The utilization of alternative hydrate inhibitors reduces emissions from dehydration units.

1 Qualitative disclosure surrounding air quality practices and quantitative disclosure for criteria pollutants are not SASB metrics for utilities, which is why the Downstream Segment is not represented within this section.
2 Upstream Segment data does not include Highland Field Services. Criteria pollutant emissions for Highland Field Services provided in the appendix.

Managing the Evolving Regulatory Environment

The Company regularly reviews and evaluates the impacts that proposed and enacted legislative and regulatory changes and trends may have on our business segments. In recent years, there has been a significant increase in regulatory changes focused on updating emissions standards and sources. While the current federal administration has expressed a goal to roll back or revise some of these initiatives, most remain in place today, and the Company has taken a proactive approach to compliance.

	Federal and State Enacted Legislation and Regulations Focused on Emissions	Company Initiatives to Address Emissions-Focused Rules
EPA Methane Rule (OOOOb and OOOOc)	Applies to the Company’s Midstream and Upstream Segments. New, modified, and reconstructed facilities are required, among other things, to establish monitoring and emissions standards, increase leak detection and repair requirements, and replace certain equipment. States are required to enact similar provisions for existing facilities within the next five years (OOOOc).	<ul style="list-style-type: none">• Installed vapor destruction units for the capture and destruction of methane emissions from produced water tanks• Conversion of natural gas pneumatics and pumps, as applicable• Implementing best management practices to reduce venting from well liquid unloading• Evaluation and potential expansion of existing monitoring and replacement program for compressor rod packing• Installation of VGRs on centrifugal compressor dry gas seals• Developed a response plan to outline the process for investigation and response if a super emitter event notification is received• Expanding existing LDAR programs on assets as appropriate
Updated GHGRP Rules	Applies to all Company segments. Requires operators to revise calculations, recordkeeping, and reporting of greenhouse gas emissions through updated methodologies and new and updated source emission factors (will be reflected in next year’s Corporate Responsibility Report for 2025 emissions).	<ul style="list-style-type: none">• Continuing to preemptively include sources covered under the NGSI and ONE Future protocols in our emissions disclosed in this Report• Continuing to calculate CO₂e values in accordance with the published 100-year time horizon global warming potential (GWP) values from the IPCC Fifth Assessment Report (AR5, 2014) as preferred by SASB• Preemptively implemented calculation methodology for produced water storage tanks and compressor engines (Upstream Segment only)
New York Climate Act	Created emissions reduction and electric generation mandates and authorized related regulatory actions, which could impact the Downstream Segment’s customer base and create greater challenges in the development of natural gas infrastructure. In connection with the Climate Act, New York also enacted legislation that includes a natural gas ban for certain new construction beginning in 2026.	<ul style="list-style-type: none">• Enacting the Utility’s Long-Term Plan incorporating specific decarbonization actions• Developing customer non-pipe alternative solution protocols, certified and renewable natural gas procurement pilot programs, and hybrid heating and demand response pilot programs

Ecological Impacts and Biodiversity Protection

National Fuel remains focused on ensuring our operations have minimal impacts on the environment and natural resources in and around our operating footprint. With environmental stewardship as one of our guiding principles, environmental protection and conservation of resources are embedded within our policies, procedures, and project development. We utilize procedures, technologies, and best management practices across our businesses to develop, build, and operate our assets in a manner that respects and protects the environment.

Managing Our Environmental Programs, Policies, and Practices

Consistent with our Environmental Policy Statement, the Company continues to prioritize complying with all environmental laws and regulations and integrating environmental protections and conservation considerations into our planning and decision making. The importance of environmental compliance is emphasized throughout all levels of the Company, as well as with our contractors. Additionally, quarterly meetings are held at the executive level to address environmental matters across all segments of the Company.

Downstream and Midstream Segments

In the Downstream and Midstream Segments, the environmental group facilitates and ensures compliance by coordinating effective management policies and practices for our projects and assets within our service territory. The Company maintains guidance relating to resource impact minimization and environmental compliance such as National Fuel's Engineering Design Manual (EDM) and its Erosion and Sedimentation Control and Agricultural Mitigation Plan (ESCAMP), among other specifications. National Fuel's construction, operation, maintenance, and expansion of natural gas facilities is closely coordinated with local, state, federal, and tribal authorities, where appropriate.

We continually review and evaluate the impact that both existing and potential environmental regulations may have on our environmental management program. Dedicated cross-departmental groups meet regularly to address proposed policies and regulations, project-specific compliance conditions and tasks, review monitoring and inspections, and design future action plans. We also routinely engage with trade organizations and other companies to discuss important industry issues and best practices. National Fuel voluntarily commits to many natural gas industry best practices including:

- [Environmental Inspector Guidance Recommended Qualifications and Best Practices](#)
- [INGAA Greenhouse Gas Emissions Commitments](#)
- [INGAA Commitments to Responsible Pipeline Construction](#)
- [INGAA Commitments to Pipeline Security](#)
- [INGAA Commitments to Landowners](#)
- [INGAA Commitment to Pipeline Safety](#)

Upstream Segment

Our Upstream Segment maintains an Environmental Health and Safety (EHS) Policy, which reflects Seneca's EHS values. The EHS Policy is regularly reviewed, updated, and approved by Seneca leadership. Quarterly management review meetings are also held between the Seneca EHS team and senior leadership to discuss environmental, health, safety, and sustainability activities, metrics, and opportunities. The Seneca Integrated Management System (IMS) is a comprehensive system that applies to all aspects and phases of our operations. This system is modeled after ISO Standards, Equitable Origin's EO100™ Standard for Responsible Energy Development, and the International Finance Corporation Performance Standards. Although Seneca does not formally participate in or apply for certification in ISO 14001 (Environmental Management), or ISO 45001 (Occupational Health & Safety Management), those frameworks are used as the foundation for creating a complete management system for our upstream operations. Seneca also has a set of best management practices ("BMPs") for critical operations such as containment construction and flowback operations. These BMPs are in addition to our standard operating procedures and other guidance documents for normal activities.



Project Planning and Development

The Company integrates environmental protection considerations into its project planning and decision making. The Company’s project planning involves significant efforts to avoid ecologically sensitive areas where threatened and/or endangered species exist or that have high ecological value in terms of ecosystem function, species richness, or species diversity. The foundation of this planning is built around our compliance with applicable federal, state, and local laws and regulations, as we regularly consult with federal and state agencies to identify ecologically sensitive areas.

Partnering with Our Regulators and Community Groups to Enhance Local Habitats

Seneca partnered with U.S. Army Corps of Engineers, Pennsylvania Fish and Boat Commission, and the Tioga County Bass Anglers to improve the Hammond Lake fish habitat in Tioga, PA. The groups built and installed 30 fish habitats using local wood and recycled stones. The habitats will help increase fish populations by creating a good breeding environment and promoting a strong ecosystem that supports larger fish such as bass.



Environmental Regulatory Engagement	Environmental Stakeholder Engagement	Community Outreach and Landowner Engagement
<ul style="list-style-type: none">• United States Army Corps of Engineers• Federal Energy Regulatory Commission• United States Fish and Wildlife Service• State Historic Preservation Office• New York State Department of Environmental Conservation• New York Natural Heritage Program• Pennsylvania Department of Environmental Protection• Pennsylvania Fish and Boat Commission• Pennsylvania Game Commission• Pennsylvania Department of Conservation and Natural Resources• Tribal Historical Preservation Office• State Departments of Transportation• Local municipalities	<ul style="list-style-type: none">• Early identification of and coordination with private, local, tribal, state, and federal agencies and stakeholders• Collaborating with applicable ecological experts/agencies to assess potential impacts to stream and wetland resources, cultural and historic resources, and threatened and endangered species. We consider potential storm water or floodplains, civil engineering, and steep slope stabilization/mitigation concerns• Conduct project routing and planning exercises to assist with resource avoidance, impact minimization, and development of project-specific alternatives analyses, where practicable	<ul style="list-style-type: none">• Early and regular engagement, coordination, negotiation, and issue-resolution with affected landowners, tenants, communities, and others that may be affected by the proposed project• Engagement with local tribal and government officials to inform them of the proposed project and to help them address questions from their constituents• Review of facility locations and safety procedures with emergency responders• Establishment of a point of contact for stakeholders to communicate with throughout the duration of the project• Conduction of and participation in public meetings to discuss potential short term and long term environmental considerations with the public, including landowners, governmental authorities, tribal representatives, and other stakeholders

Pipeline Project Construction and Restoration Process

Pre-Construction

Initial project screening involves review of desktop resources, submission of applicable agency consultations and permits, as well as the development of Erosion and Sediment (E&S) Control Plans. Permitting agencies review projects and provide specific considerations and permit conditions. Informed by applicable regulations and guidance, as well as our internal ESCAMP and EDM, projects may necessitate:

- Threatened and endangered species mitigation measures
- Site-specific restoration plans
- Post-construction stormwater management plans

Following preliminary project coordination and permitting, pre-construction meetings are held to review and discuss all compliance considerations, plans, agreements, permits, construction techniques, and restoration expectations. Construction plan implementation, monitoring, remediation, and procedures are discussed in detail with pertinent internal project management personnel, general contractors, and sub-contractors. We may also host other pre-construction training to effectively communicate important environmental permitting, plans, and procedures.

Construction

Our construction process both follows agency-approved permits and plans and implements our internal environmental management policies and pre-construction plans. Prior to earth disturbance activities, E&S control devices are installed and signage is posted to identify wetlands, streams, and approved and prohibited roads. Our personnel and third party environmental inspectors monitor site adherence to the construction process. Throughout the duration of construction, E&S control devices are monitored and maintained.

Restoration

Our goal is to establish, strengthen, and enhance positive relationships with all project stakeholders. This includes restoring resources and property to a condition that is as good as or better than pre-project conditions. We view landowners as long-term partners with equal and mutual interests. To ensure that landowner concerns are heard and acted upon, our procedures include grievance reporting mechanisms. We monitor the status of vegetation growth and establishment and perform follow-up inspections, monitoring, and reporting to permitting agencies until permit closeout. Invasive species mitigation, stream/wetland restoration, and post-construction stormwater controls are monitored for effectiveness.

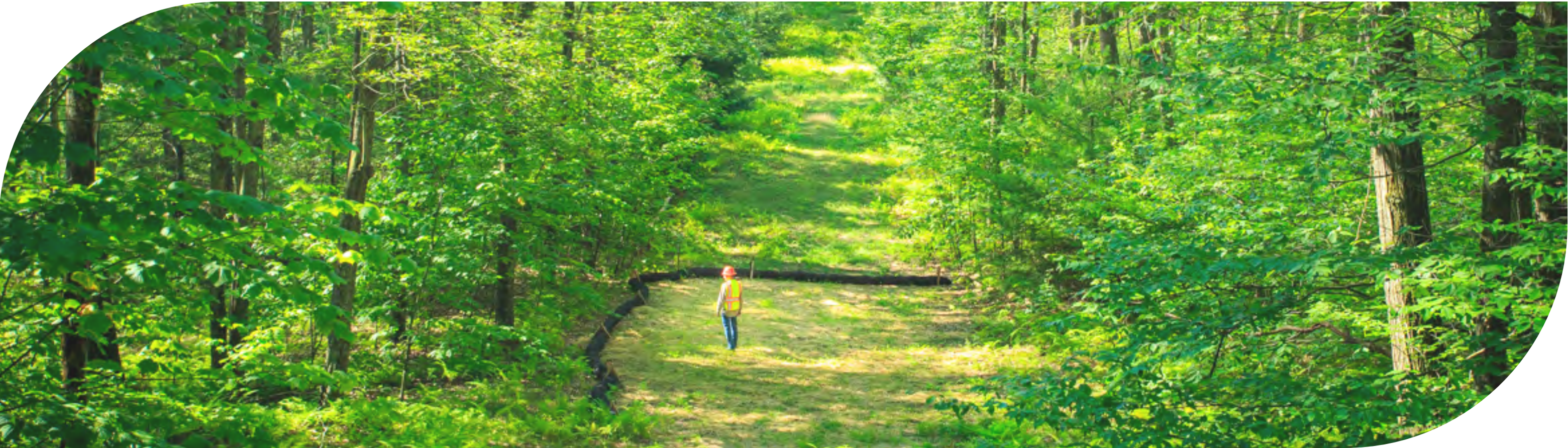
Project site restorations may enhance existing habitat through wetland seeding and planting practices or create additional species habitat through strategic placement of timber, brush and/or stone, and riparian stabilization buffers adjacent to aquatic resources. We implement BMPs aimed to restore project sites to pre-construction conditions. These include grading and topsoil replacement, as well as the restoration of natural contours and drainages. Additionally, excess rock is removed from the top foot of soil in all agricultural fields, pastures, and residential areas. Buried rock that is above the top of existing bedrock profile in agricultural lands is also removed. Construction debris is removed and properly disposed of, and once vegetation regrowth has met or exceeded regulating agency perennial vegetation establishment requirements, E&S controls are removed.

Inspection

Employees and contractors routinely perform site inspections throughout the duration of projects. We have established standardized guidance related to inspection of inactive construction projects and developed a notification system for inspection of active/inactive sites before and after inclement weather. Our project sites also undergo frequent agency inspections, often unannounced, and we consider these as opportunities to demonstrate our continued compliance with the respective agency requirements.

Facility Operation

Once construction or maintenance of a pipeline or facility and associated areas have been restored, projects move into the operational phase. During this phase, routine maintenance and monitoring practices help ensure that installed facilities remain integrated with the natural environment. To help restore areas with native species, we seed project sites and rights-of-way with native pollinators, creating habitats for migratory bird species, supporting sensitive plant and animal species, and allowing for the proper restoration of valuable wetland and stream resources.



Minimizing Our Footprint and Land Disturbance¹

We aim to avoid areas with protected conservation status of endangered species and work to ensure our activities have minimal impact on local aquatic, terrestrial, and wildlife resources.

Midstream Segment

Our Midstream Segment utilizes mapping tools and surveys to identify threatened and endangered species, which we protect by surveying habitats, restricting construction activities during biologically sensitive periods, and preserving and restoring habitats. Additionally, soil, vegetation, and other resources are banked during construction projects and repurposed during restoration projects. Specialized native seed mixes are used during replanting to prevent erosion and sedimentation, enhance wildlife foraging areas, promote endemic pollinator species, and re-establish indigenous wetland species.

Our Midstream Segment strives to minimize its footprint in protected conservation areas and endangered species' habitats ("Designated Areas") by following proper project siting, scoping, and resource avoidance measures. This is accomplished through continuous agency consultation and a thorough analysis of appropriate avoidance, minimization, and mitigation measures.

Only 2% of our Midstream Segment operating footprint is within areas of protected conservation status or critically endangered species habitat.

Midstream Segment Land Owned, Leased, or Operated within Areas of Protected Conservation Status or Endangered Species Habitat	2024
Total Operating Footprint (Acres)	15,910
Operating Footprint (Acres) Near Designated Areas ²	8,168
% of Total	51%
Operating Footprint (Acres) Within Designated Areas ^{2,3}	257
% of Total	2%

We also work diligently to restore any impacted areas. The acreage of disturbed land in the following table was calculated by totaling the acreage associated with projects requiring a state earth disturbance permit in 2024. We restore project sites from April 1 to October 15 each year. If restoration is not initiated by October 15, areas are winterized or temporarily restored and stabilized until the seasonal conditions allow for permanent restoration. National Fuel strives to fully restore project areas within one year of the in-service date. Our ESCAMP is used as a guide during construction and restoration unless specific requirements are given by regulatory agencies or landowners.

Midstream Segment Acreage Disturbed and Restored	2024
Acres not Permanently Restored from prior years ⁴	80
Acres Disturbed in current year	160
Total Acres Impacted	240
Acres Permanently Restored in current year ⁴	230
% of Impacted Area Permanently Restored in current year	96%

Our Midstream Segment works persistently to prevent the occurrence of hydrocarbon spills on projects and worksites. Specific plans, such as Spill Prevention and Response Procedures Plans; Spill Prevention, Control, and Countermeasure Plans; and Inadvertent Return Plans, are in place to prevent spills and provide guidance to remediate a spill. In the event of a spill, response teams are deployed to contain and remediate environmental exposure, while the appropriate agencies are notified as required by our procedures, plans, and regulations.

Midstream Segment Number and Volume of Hydrocarbon Spills	2024
Number of Hydrocarbon Spills > 1 Bbl ⁵	0
Total Volume of Hydrocarbon Spills Reported (Bbl)	0
Total Volume of Hydrocarbon Spills Recovered (Bbl)	0
Total Volume of Hydrocarbon Spills Impacting Unusually Sensitive Resources (Bbl) ⁶	0
Number of Non-Hydrocarbon Spills > 1 Bbl ⁷	4
Total Volume of Non-Hydrocarbon Spills Reported (Bbl)	42
Total Volume of Non-Hydrocarbon Spills Recovered (Bbl)	40
Total Volume of Non-Hydrocarbon Spills Impacting Unusually Sensitive Resources (Bbl)	0

¹ Disclosures surrounding operations within designated areas and hydrocarbon spills are not SASB metrics for utilities, which is why the Downstream Segment is not represented within this section.

² World Database on Protected Areas (WDPA) and Ramsar Wetlands of International Importance data was used to determine areas of protected conversation status. The United States Fish and Wildlife Service Environmental Conservation Online System (USFWS ECOS) was used to analyze land considered to be active proposed and final critical habitat for endangered species. This database was used in lieu of the IUCN Red List of Threatened Species defined in the SASB standard due to USFWS's involvement and review of our Midstream Segment's projects. These datasets were accessed on February 14, 2024.

³ Acreage within the boundary of lands designated as a protected conservation area or as endangered species habitat.

⁴ Includes acreage associated with projects that commenced permanent restoration in 2024. This includes initiating permanent restoration on projects that were constructed 2023 that only had temporary restoration completed during that year. Permanent restoration is defined as areas for which final decompaction, grading, topsoil replacement, installation of permanent erosion control structures, lime, fertilization and seeding have been completed, even if monitoring is on-going. Areas where impervious surfaces or stormwater controls have been installed are also considered to be permanently restored.

⁵ A spill is defined as greater than 1 Bbl (42 U.S. gallons or 159 liters). Spills include those that reached the environment and exclude spills that were contained within impermeable secondary containment.

⁶ Unusually Sensitive Areas in the U.S. is characterized using the definition provided by PHMSA.

⁷ All spills were addressed in a timely manner and received regulatory agency approval for closure.

Upstream Segment

Seneca’s multi-well pad development practices allow us to maximize the natural gas reserves that we can access underground while minimizing our operational footprint on the surface. We are often able to drill 10 or more wells from a single surface pad and extend the lateral length of our wells by up to three miles horizontally. Seneca has extended this minimization by leveraging existing Marcellus pads to drill additional wells into the Utica Shale formation, often via return trips.

Seneca has submitted more than 140 Pennsylvania Natural Diversity Inventory (PNDI) environmental reviews through the Pennsylvania Natural Heritage Program (PNHP) over the past 5 years. The PNHP is a partnership between the Department of Conservation and Natural Resources, the Pennsylvania Game Commission, the Pennsylvania Fish and Boat Commission, and the Western Pennsylvania Conservancy in cooperation with the U.S. Fish and Wildlife Service. PNHP is a member of NatureServe, an international network of natural heritage programs that gather and provide information on the location and status of important ecological resources including plants, vertebrates, invertebrates, ecological communities, and geologic features. Proposed projects conduct a PNDI environmental review to identify potential impacts to threatened, endangered, and rare species. If threatened or endangered species show up in this review, the area is surveyed to confirm whether the species is present in the permit area. If these species are found, mitigating actions are taken, including route avoidance, special fencing, or other restrictions.

Less than 1% of our Upstream Segment reserves are within sites with protected conservation status.

Total Seneca Reserves Near Sites with Protected Conservation Status or Endangered Species Habitat	2024
Total Reserves (Bcfe)	4,753
Reserves within Sites with Protected Conservation Status (Bcfe)	15
% of Reserves within Protected Conservation	< 1%
Reserves within Areas in which Endangered Species Habitat Identified (Bcfe)	532
% of Reserves within Areas of Endangered Species	11%

Upstream Segment Number and Volume of Hydrocarbon Spills	2024
Number of Hydrocarbon Spills > 1 Bbl ¹	0
Total Volume of Hydrocarbon Spills (Bbls)	0
Total Volume of Hydrocarbon Spills Impacting Environmentally Sensitive Shoreline	0
Total Volume of Hydrocarbon Spills Recovered (Bbls)	0
Number of Non-Hydrocarbon Spills > 1 Bbl	2
Total Volume of Non- Hydrocarbon Spills (Bbls)	18
Total Volume of Non-Hydrocarbon Spills Recovered (Bbls)	18

Seneca Employee Champions Biodiversity

Seneca partnered with the Pennsylvania Ruffed Grouse Society to address the needs of the ruffed grouse, the state bird whose populations have declined. The initiative was part of a biodiversity project at a reclaimed water impoundment near Kane, PA. Mike Hancharick led the reclamation project, tracking progress and participating in fieldwork. In 2024, employees and volunteers planted a variety of shrubs and berries, along with:

- 300 aspen trees
- 15 chestnut trees



“Seneca has always been steadfast in its commitment to reclaim the land as wildlife habitat once the impoundment was no longer necessary. I’m proud to work for a company that’s not just committed to responsible development but takes an active role in projects that benefit the communities we work and live in.” – Mike Hancharick, Seneca Supervisor, Geomatics

Conserving, Enhancing, and Restoring Biodiversity

Our routine restoration and maintenance procedures aim to protect habitats within our operating area. These practices are often supplemented with opportunities to further engage with stakeholders to create, conserve, or enhance natural areas or otherwise afford ecological protection.



Advancing Conservation Through Monarch Butterfly Tagging

National Fuel participated in the Monarch Watch Monarch Tagging Program – a community science initiative that helps track the migration of monarch butterflies from the Northeast to Mexico. Our team helped to safely capture, tag, and release more than 50 monarchs.

National Fuel Pollinator Program

In 2022, our Downstream and Midstream Segments enrolled 30,952 acres of transmission and distribution pipeline system ROWs into the Nationwide Candidate Conservation Agreement with Assurances (CCAA) for the monarch butterfly. The CCAA is intended to enhance and expand available monarch butterfly habitats through conservation measures. As part of the program, we have implemented conservation mowing, idle lands and set asides, and the use of pollinator seed mixes during restoration, with approximately 159 acres of seed mixes planted since 2022.¹



2024 Pollinator Program Achievements

- Exceeded our annual goal by 65% and provided 5,011 acres of conservation measures within our CCAA enrolled lands.
- Monitored 34 randomly selected plots within ROWs for pollinator and monarch butterfly habitats.
- Monitoring results indicated an average of 239 milkweed stems and 39% nectar plant cover per habitat acre within sample ROWs.
- Voluntary participation on the Industry Advisory Council for the development of the Bumble Bee Conservation Benefit Agreement, similar to the Monarch CCAA, in collaboration with the USFWS.
 - Agreement aims to protect 11 species of bumble bee, including the endangered rusty patched bumble bee, as well as the yellow bumble bee and the American bumble bee.

Seneca Surface Footprint Neutral Program

To demonstrate its commitment to the environment, our Upstream Segment created the Surface Footprint Neutral Program to restore one acre of land for every acre disturbed by:

- Planting trees and cultivating native pollinator habitats
- Implementing watershed and wildlife conservation initiatives
- Reusing natural resources in beneficial ways
- Monitoring and removing invasive plants

Surface Footprint Neutral Program Goals and Achievements

- Prioritized operating areas to maintain and improve biodiversity on an acre-by-acre replacement of annual pad and road development
- Restored over 71 acres of habitat, surpassing the 37 acres used for construction
- Improved environmental biodiversity as well as community recreational access



Controlling Invasive Species in Tioga State Forest

Seneca assisted the Pennsylvania Department of Conservation and Natural Resources (DCNR) in killing and controlling invasive species like Barberry, Russian Olive, Honeysuckle, and Multiflora Rose to promote healthy biodiversity and ensure access for recreational activities.

¹ Accounted for 151 acres adopted in the CCAA program.

Waterway Improvement Projects

Our Company is committed to protecting the natural resources within our operating footprint, including water. Beyond minimizing environmental impacts from projects, we focus on installation and restoration techniques that help protect water sources, habitats, and water-based recreation in our communities.

Midstream Collaboration to Establish New Wetlands

Midstream Company collaborated with the Pennsylvania DCNR to establish a new wetland spanning more than an acre on DCNR's property in McKean County, PA next to existing wetlands in the upper Clarion River watershed. The project aims to offset environmental impacts from a nearby pipeline project and includes:

- Planting native vegetation and over 600 trees
- Installing of 200+ feet of limestone-filled trench to improve a nearby creek's water quality

Midstream Company will continue to collaborate with conservation groups and monitor the site over the next five years.

Streambank Stabilization

As part of a pipeline installation project, National Fuel installed streambank stabilization measures to protect the area from potential erosion issues that are prevalent in the area. National Fuel obtained local materials to ensure the stone used in the boulder toe protection was native to the area. We also installed approximately 140 trees as riparian restoration plantings.



During



The construction of permitted stream crossings typically take no more than 24 hours to install the pipeline and restore the streambed and banks, ensuring minimal disruption to flow and aquatic species.

After: 70+% Perennial Vegetation Achieved



Water Management and Integrity

National Fuel is committed to environmental stewardship and the protection of natural resources. Our Upstream Segment developed high-quality infrastructure to handle all aspects of our water management needs, including storage, treatment, transportation, recycling, and disposal. Our Downstream and Midstream Segments aim to minimize impacts to water resources during pipeline construction by using effective, proven construction BMPs and protective water-body crossing methods.

Upstream Segment’s Focus on Protecting Freshwater Aquifers

Drilling Practices: Seneca’s horizontal drilling practices use water-based drilling fluid or air when drilling through freshwater zones. Once freshwater zones are protected by casing and cement, we use a synthetic oil-based mud system when drilling.

Mechanical Integrity Assessments: Seneca performs quarterly mechanical integrity inspections of all operating wells to ensure the well integrity is intact and can contain and isolate gas and brine from drinking water supplies. If any mechanical integrity issues are identified during the inspection process, they are investigated and remediated.

Pre-Drill Water Sampling: Seneca performs pre-drilling water sampling on every water source within 4,000 feet of each pad to obtain baseline measurements. This extended radius is more than the 2,500-foot Pennsylvania regulatory requirement. Seneca contracts with an independent third-party environmental consultant to compile a list of property owners to notify of the proposed drilling activities and Seneca’s intention to sample their water. The environmental consultant collects necessary groundwater and surface water samples and sends them to a state certified laboratory for testing. The analytical results are electronically submitted to the PADEP and are also shared with the landowner.

Water Quality Investigations: Seneca investigates and performs post-drill sampling if a water quality complaint is filed. Complaints are infrequent, and the root cause is often determined to be unrelated to oil and gas activities.

Containment Best Practices and “Zero Surface Discharge” Policy: To protect surface and groundwater resources throughout the life of a well, Seneca follows a “Zero Surface Discharge” policy which requires containment of any liquids or solids that may be considered residual waste. Wastes and chemicals are managed in “primary containment” vessels, which are placed inside of one or two additional containment layers designed to capture and control spills or leaks.

Highland Field Services

Since its inception in 2015, Highland has made significant investments in water infrastructure in Pennsylvania, including storage and treatment facilities, on-pad tanks and containment vessels, evaporation technology, and a network of water distribution pipelines.

Recycling Produced Fluids: Seneca operates in the Appalachian Basin in areas with low and low-medium water risk per the Aqueduct Water Risk Atlas. Highland receives and recycles produced volumes generated from third-party operators who would otherwise need to transport their produced fluids for out-of-state disposal. In 2024, Seneca’s Marcellus and Utica shale well completions used 58% recycled fluids and only 42% freshwater.

Reducing Environmental Footprint: Highland’s pipeline distribution system delivers fluids from storage facilities directly to Seneca’s Marcellus and Utica development pads. This vast pipeline network helps reduce truck traffic, leading to a decrease in emissions and less wear on the roads. It also increases safety and minimizes traffic congestion.

Developing Innovative and Environmentally Sound Disposal Solutions: Seneca and Highland actively develop their own underground disposal well capabilities as part of an underground injection control (UIC) program designed to manage Seneca’s disposal needs in an environmentally sound manner. Seneca and Highland currently have operating UIC wells in Pennsylvania.

Promoting Transparency and Regulatory Compliance: Fluid handled by Highland is tracked for regulatory and internal reporting purposes. We report the fluid movement and usage in various forms, including downhole volumes for well completion, incoming/outgoing loads at the storage facilities and pads, fluid volumes utilized by third-party operators, and freshwater storage levels across our operations.

Public Disclosure of Fracturing Chemicals Used

Since February 2011, 100% of the chemicals used in Seneca’s hydraulically fractured wells have been disclosed on www.fracfocus.org, the chemical registry website created by the Ground Water Protection Council and the Interstate Oil and Gas Compact Commission. This site contains detailed information about the hydraulic fracturing process and a listing on a well-by-well basis that specifies the contents of hydraulic fracturing fluids used at each location.

Chemical Usage: Seneca does not use diesel and/or BTEX (benzene, toluene, ethylbenzene, xylenes) chemicals during fracturing operations. We continually look for opportunities to use “green” chemicals during completions operations. The friction reducer we utilize has been certified to NSF/ANSI Standard 60, a standard which ensures the safety and suitability of chemicals used in public drinking water supplies. In addition, the volume of chemicals being utilized is regularly evaluated, and opportunities to reduce the volume and/or concentration of chemicals is a priority.

In 2024, Highland recycled **more than 95%** of Seneca’s produced fluids.

Waste Management

Corporate Waste Management Program

We are committed to reducing the quantity of hazardous and non-hazardous waste generated through our operations. To this end, the Company tracks the wastes generated at its facilities and evaluates ways to reduce the rate of, or eliminate where possible, waste generation. All segments of National Fuel have waste management procedures to help ensure the proper management, storage, handling, and disposal of waste.

Our routine business operations produce various types of waste, including:

- Used oil
- Construction and demolition debris
- Drill cuttings
- Scrap steel
- Non-hazardous waste and residual waste (e.g., brine, glycol)
- Universal waste (e.g., used batteries, fluorescent light bulbs, waste aerosols)
- Hazardous liquids and solid waste (e.g., spent solvents, hydrocarbon liquids)

Executive level oversight is incorporated into our waste minimization plans, highlighting the importance we place on waste management. Employees are encouraged to promote new ideas for waste minimization, energy conservation, and environmental protection.

The Company tracks waste generation, evaluates opportunities for reduction, and implements strategies to eliminate, reuse, and recycle waste streams.

We understand that to effectively manage the Company’s waste streams from our core operations, we need to accurately characterize waste, as well as its tracking and disposal. The EPA requires generators of hazardous wastes to determine the waste generator status of each facility based on the amount of waste generated in a calendar month. Most of our Downstream and Midstream locations either do not generate any hazardous wastes or produce small amounts of hazardous wastes, placing them in the Very Small Quantity Generator¹ category. Occasionally, a facility may generate enough hazardous waste to meet the Small Quantity Generator² or Large Quantity Generator³ threshold, however, those instances are rare and are often isolated events. Our Upstream Segment did not produce any hazardous waste in 2024.

The Company tracks waste generation, evaluates opportunities for reduction, and implements strategies to eliminate, reuse, and recycle waste streams. This is accomplished through effective vendor selection, product evaluations, inventory assessments, beneficial reuse assessments, recycling, and treatment processes. We have adopted the EPA’s Waste Management Hierarchy to prioritize waste minimization preferences.

Downstream and Midstream Segments⁴



Solid Wastes
99%
Non-Hazardous



Liquid Wastes⁵
99%
Non-Hazardous



1 Generate no more than 100 kg (220 lbs) of hazardous waste; or 1 kg (2.2 lbs) of acutely hazardous waste in a calendar month.
2 Generates more than 100 kg (220 lbs) and less than 1,000 kg (2,200 lbs) of hazardous waste, or 1 kg (2.2 lbs) of acutely hazardous waste in a calendar month.
3 Generates more than 1,000 kg (2,200 lbs) of hazardous waste, or greater than kg (2.2 lbs) of acutely hazardous waste in a calendar month.
4 Our Upstream Segment does not produce any hazardous wastes.
5 For Midstream in 2024, 33.90 thousand cubic meters of produced water and flowback were generated; 58.8% was injected for disposal, and 41.2% was recycled.

Waste Management Hierarchy

1

Source Reduction/Waste Prevention

Most Desirable

Begins with the practice of reducing or eliminating waste by product substitution, inventory control, good housekeeping, equipment maintenance, and equipment and technology upgrades.

2

Reuse

Can include repurposing a used item (identified through periodic inventory assessments and environmental audits), regenerating fluids used in our equipment, or selling/transferring of unneeded products or wastes. The most significant reuse stream involves produced water.

3

Recycling

Recycling can occur either in-house, onsite, or off-site at a recycling facility. A significant portion of our waste streams are recycled including used batteries, fluorescent light bulbs, used oil, electronic equipment, and scrap steel.

4

Treatment

Treatment ranges from simple physical separation of multiphase liquids to chemical treatment of wastes that render them non-hazardous or less hazardous. For example, we may decant natural gas condensates through a process of separating water from the hydrocarbon or oil.

5

Disposal

Least Desirable

When other options in the waste management hierarchy are not feasible, waste is managed through permitted methods such as incineration, injection, or discharge. Landfilling is used only as a last resort.



Waste Generated

National Fuel understands the importance of a proper waste management program to effectively mitigate adverse environmental impacts. In 2024, the Company continued to refine and utilize waste management best practices.

Recycled more than 2.3 million pounds of non-hazardous solid wastes.

Recovered, recycled, or reused more than 98% of non-hazardous liquid wastes.

Generated 16% less solid wastes in 2024 compared to 2023.



Safety

Safety Culture and Highlights47

Employee and Contractor Safety48

Compliance, Training, and Development 50

Customer and Community Safety51

Emergency Preparedness and Response53

System Integrity and Safety.....54



Safety Culture and Highlights


With safety as a core value, our highest priority is the safety of our customers, employees, contractors, and communities we serve. We're proud of our safety record, and we work diligently to maintain a safety culture that is embraced throughout the organization.



2024 Safety Highlights



185,897
Total number of
safety and operational
training hours



**75 emergency
response drills**
with 1,750+
participants



50+ meetings
held with 1,000+
local emergency
responders



Implemented
operational safety days
within Downstream and
Midstream segments



Continued focus on
leak management programs
across all segments

Driving our Safety Culture

- Employee and contractor training and development
- Safety Management Systems
- Customer outreach and education
- Emergency Preparedness and Response
- Critical Incident Management
- Integrity of gas delivery infrastructure
- Robust compliance programs
- Dedicated emergency hotlines
- Employee and contractor Stop Work Authority/Responsibility



Safety Management Systems

- Downstream and Midstream's Pipeline Safety Management System (PSMS): Modeled after API Recommended Practice 1173 - Pipeline Safety Management Systems
- Upstream's Integrated Management System: Modeled after ISO 45001, ISO 14001, and Equitable Origin's EO100™ Standard for Responsible Energy Development

Employee and Contractor Safety

Our safety programs and management practices ensure that a culture of safety is prioritized. To strengthen our safety-oriented culture, the Company has focused on in-person safety presentations where the executive and management teams endorse and emphasize safety as a core value.

Employee Safety Programs

- First Aid/CPR/AED Training (available to all employees)
- Hazardous Energy Control/Lock-out/Tag-out Training
- Business Continuity Simulations
- Emergency Response/Simulation Training
- Driver and Vehicle Safety Training
- New Hire Safety Orientation
- Hazardous Waste Operations and Emergency Response (HAZWOPER) Training



Safety Communication and Engagement	Safety Preparedness	Field Safety Guidance	Reinforcing Safety as a Core Value
<ul style="list-style-type: none">• Frequent safety alerts, reminders, and lessons learned distributed to employees, contractors, and industry groups.• Intranet resource center and Environmental, Health, and Safety (EHS) reports.• Surveys to manage and improve our safety culture.• Engagement tools, including options for anonymous reporting, for employees and contractors to submit safety observations, recommendations, good catches, and near misses.	<ul style="list-style-type: none">• Safety Improvement Teams (SIT) at the Utility to develop and improve safety programs and culture.• Tabletop simulations and live drills for emergency response preparedness with the participation of local first responders.• Employee and management calls and meetings to identify and review lessons learned, set safety expectations, and share safety practices.• Extensive employee training focused on equipment operation and ergonomics, emergency response and first aid, and situational awareness.• Vehicle and driver training, including the use of cameras in some vehicles.	<ul style="list-style-type: none">• Annual Downstream and Midstream Operations Safety Days for employees to focus on reinforcing safety practices and strengthening safety culture.• “Stop Work Responsibility” for all employees and contractors who observe an unsafe practice or abnormal operating condition.• Personal protective equipment, signage, construction site work rules, safety procedures, and guidelines.• Comprehensive web-based operating procedures to support safety and operational compliance in the field.• Periodic contractor meetings and safety standdowns in the field to discuss safety issues.• Trainings for affected personnel whenever state and federal regulations are updated.	<ul style="list-style-type: none">• Periodic reviews conducted by Internal Audit that evaluate our environmental and safety programs.• Onsite audits and inspections performed by regulatory personnel and safety staff to reinforce safety policies and procedures.• Management audits to reinforce safety expectations.• Safety and environmental requirements for employees and contractors are communicated throughout the year to enforce rules and expectations.• Executive and salaried employee compensation program metrics tied to safety initiatives.• Executive engagement at site locations to reinforce Company safety messaging.

Continuous Improvement of Our Operational Safety Plan

Management’s Safety Prioritization	<ul style="list-style-type: none">• Leadership from the Operations and Safety departments meet regularly to review injury trends and review concerns raised at safety meetings• Established and maintain safety goals for all employees• Continued engagement with employees to monitor work plans and execution expectations
Feedback from Operations Teams	<ul style="list-style-type: none">• Regularly engage with Operations focus groups to align teams, review safety metrics, and reinforce safety culture• Conduct safety culture surveys and/or regularly request feedback on safety-related topics
Reinforcement of Safety Culture	<ul style="list-style-type: none">• Mandatory safety training for employees to expand their knowledge and understanding of how safety aligns with their daily responsibilities• Multi-disciplinary teams conduct safety inspections and audits• Safety alerts and messages are regularly distributed to all employees
Focus on Operational Improvements	<ul style="list-style-type: none">• “Safety First” focus for all project planning, pre-project communications, and execution in the field• “Safety standdowns” for specific topics to address reoccurring and serious safety issues• Root Cause Analysis drives specific action plans to prevent injury reoccurrence• Plan-Do-Check-Act continuous improvement cycle of programs and processes



Contractor Management

The Company’s contractor management procedures prioritize and reinforce our safety expectations. Our high safety standards and expectations require contractors to adhere to the following standards:

- Safety pre-qualifications and reporting on EHS performance
- Proof of compliance with OSHA and other mandated training

- Quarterly submission of injury and incident information
- Compliance with all insurance requirements

In the event that a contractor’s safety scores on any of our job sites becomes unsatisfactory, we work collaboratively with that contractor to implement safety improvement plans and increase inspection levels. Although rare, if safety performance does not improve, that contractor is removed from our qualified bidder list.

Compliance, Training, and Development

Prioritizing Safety Through Compliance Programs

The natural gas industry is highly regulated at the federal, state, and local levels. Our compliance programs are designed to meet or exceed requirements by identifying and implementing proactive safety measures. Through continuous compliance assessments of the Company’s internal processes and procedures, we continue to improve our overall operational safety.

Upstream Segment Safety Training Programs

At Seneca, every employee is required to complete monthly computer-based safety training on topics such as ergonomics, heat stress, winter weather hazards, driving safety, and hazard communication. Employees must successfully complete a test at the end of each training session to verify comprehension. The successful completion of safety training is tied to employee and officer compensation. Some employees, depending on their job, are also required to complete in-person, hands-on training courses such as First Aid/CPR, Forklift Operations, and Hazardous Waste Operations and Emergency Response.

Downstream and Midstream Segments Operator Qualification Program and Training

Our Downstream and Midstream segments have a comprehensive operator qualification and safety program for employees and contractors to ensure compliance with regulations, Company policies and procedures, and industry best practices.

- The Operator Qualification Program includes in-person sessions with lecture components, hands-on evaluations, on-site job demonstrations, and experience requirements.
- Starting with the basics, the classes are designed to be taken sequentially; the material and concepts build in complexity and are reinforced through on-the-job experience.

Quality Assurance Group

- Our Operator Qualification (OQ) Effectiveness Review program is an iterative process to identify areas of improvement for training content and classroom material, assess Company trainers, evaluate class content, and manage field assessments performed by Operations supervisors.
- Our Operations Supervisor Development Program is intended to educate and support employees in their first years of supervision responsibilities, as well as to encourage consistent responses and solutions to challenges.

Training and Field Operations Development Departments

- We accompany individuals into the field following their completion of OQ instruction and training to reinforce classroom material in real-world conditions while maintaining high standards of safety and compliance.
- We onboard new field employees and supervisors and aid in transitioning existing employees into new roles.



Customer and Community Safety

Public Awareness Program Focused on Pipeline Safety

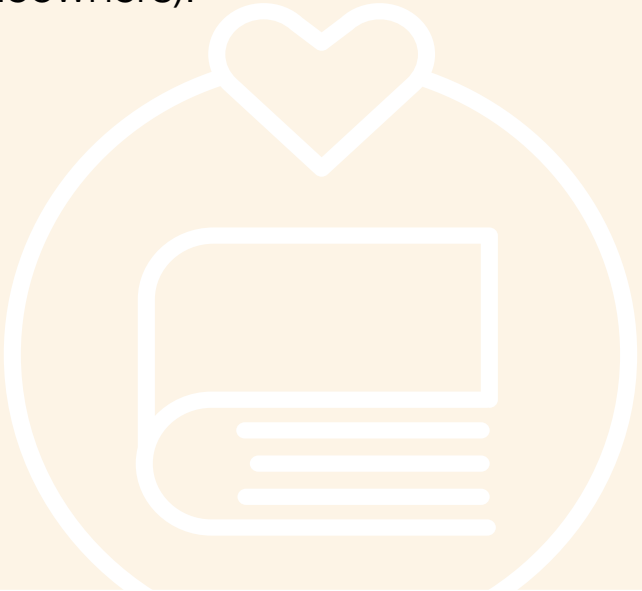
From our local call center representatives to operations and customer service personnel in the field, our employees are dedicated to producing and delivering natural gas safely and efficiently. Our public awareness programs are designed to increase safety by enhancing the public's knowledge of pipeline presence and safety precautions. By sharing information with key stakeholder audiences, including the affected public, emergency responders, excavators, and public officials, National Fuel intends to raise awareness of our pipeline facilities and help the public better understand the role they can play in pipeline safety.

2024 Gas Safety Campaign

- **60+ million impressions** using social media, billboards, television, and radio advertising concerning natural gas and pipeline safety topics within our utility service area.
- **Pipeline safety brochures** for 23,000+ excavators and emergency responders.
- **Supplemental mailings** about cross bores and meter safety to 14,000+ stakeholders, including emergency management and responders, the agriculture industry, and the forestry/logging industry.



Educational Objectives	External Stakeholder Engagement	Public Outreach
<ul style="list-style-type: none">• One-Call System: Encourage third-party use of a notification system prior to excavation and other damage prevention activities.• Improve Recognition: Identification of physical indications of a possible release.• Know What To Do: Public safety steps to take and how to report a potential gas pipeline release.	<ul style="list-style-type: none">• First Responder Relationships: Maintain liaisons with appropriate fire departments, police departments, first responders, and public officials.• Municipal Planning and Permitting: Meetings with officials to encourage them to (1) make permit applicants aware of one-call regulations and (2) require inclusion of pipelines and easements on site plans to prevent excavation damages and future encroachments.• Regional Pipeline Safety Meetings and Tabletops: Meetings for the benefit of excavators and emergency responders.• Encroachment Agreements: Address safety requirements for encroachments on pipeline rights-of-way (e.g., excavators, drilling operators, loggers, utilities, homeowners).	<ul style="list-style-type: none">• Direct Mail Program: Pipeline safety brochures are mailed to residential homes and businesses near DOT-regulated transmission pipelines or natural gas storage fields and to excavators, emergency officials, and public officials in our service territory.• Safety Campaigns: Bill inserts, ads (newspaper, online, radio, television, billboards), and news releases regarding pipeline safety.• Online Presence: Active social media presence on major platforms and a dedicated pipeline safety stakeholder engagement web page.• Educating Other Industries: Public awareness mailings regarding pipeline safety in the agricultural and forestry industries.• School Safety: Outreach about pipeline safety to students and educators



Pipeline Damage Prevention

Our Downstream and Midstream segments dedicate significant resources to educate the public on the importance of safe excavation practices in order to help us identify potential risks and to prevent damage to our system.

Awareness Campaigns

- “Call Before You Dig” campaign, including multi-media educational outreach to local municipalities and third-party excavators
- “Look Out for the Mark Out” program utilizes tiered awards to incentivize employees to intervene when excavation activity is being performed near company facilities without a One Call request; resulted in 404 excavation interventions in 2024
- Damage Prevention Coordinators engaged with external organizations who focus on local and statewide initiatives to prevent damage to underground utility lines

System Management Focused on Damage Prevention and Minimization

- Installation of excess flow valves (EFVs) on distribution system, which automatically shut off the flow of gas if the downstream service line is damaged; Distribution Corporation has installed approximately 221,100 EFVs to date
- Damage Prevention Inspection Program that utilizes a risk modeling system to identify threats to Company facilities based on past excavator damages and then deploys third-party inspectors to educate these excavators on code requirements and safety precautions
- Midstream segment continues to install remote control valves and rupture mitigation valves to protect higher-risk regions, allowing for a rapid shutdown of pipeline facilities when an incident has been confirmed

28% decrease
in excavation
damages over the
last 5 years.



Know what's below.
811 before you dig.

Reinforcing Safe Excavation Practices

- Company personnel attend pre-construction meetings with contractors and facility owners to emphasize safe excavation practices
- Company personnel perform standby inspections during excavation near critical facilities
- Operations personnel and contractor employees are required to attend an operator excavation class focused on using mechanized equipment near gas facilities, One Call regulations, facility marking colors, proper pipeline support, and backfilling procedures

Gatekeeper Program

National Fuel encourages our employees to act as gatekeepers, as our customer service representatives and field personnel interact with hundreds of customers daily and are able to identify unusual or suspicious situations where customers may need assistance. Employees are trained to look out for warning signs as they interact with our customers and are encouraged to contact their supervisor if they believe someone requires assistance.


The program includes:

- | | |
|------------------------------------|---|
| • Unshoveled driveways/walkways | • Difficulty paying bills |
| • Snow covered home vents/exhausts | • Declining condition of home/lawn |
| • Mail piling up | • Difficulty seeing, speaking, hearing, or moving |
| | • Unattended children or pets |


In the past 3 years, our Operations and Customer Service teams have made **more than 790 safety referrals** through the Gatekeeper Program.

Emergency Preparedness and Response


We are committed to effective emergency response to minimize the impacts to our employees, contractors, customers, and communities in the event of an emergency. The Company prioritizes safety and conducts regular emergency response drills for each operational department. These drills include collaborating with local emergency management agencies to ensure well-coordinated and effective responses to crisis situations.




Emergency Response Tabletops, Drills, and Training: Our field operations personnel and management assess our capabilities, practice our response procedures, and share lessons learned




Emergency and Spill Response Plans: Provide site-specific information and guide personnel during emergencies




First Responder Outreach: Provides information on our facilities and emphasizes coordination in the event of an emergency



First Responder and Emergency Management Training: Promotes safe identification of and response to natural gas emergencies



Pipeline Safety Webpage: Offers pipeline safety resources for stakeholders and the general public



Dedicated Emergency Hotline: 24/7 hotline to report gas leaks and emergencies

2024 Utility Emergency Response Time

Our Utility is among industry leaders in this area as confirmed by annual industry benchmarking and statewide regulatory performance measure reporting.

99%
of emergency
calls responded to
within 45 minutes

Trained more than 50 external emergency response services and government agencies across our operating territory



More than 1,000 firefighters attended free, in-person training; many participated in our fire school to practice extinguishing different types of natural gas pipeline fires

All segments perform in-depth annual incident simulations to practice and assess cross-departmental emergency responses



System Integrity and Safety

Processes to Identify and Manage Risks

To ensure the safety of our employees, contractors, and communities, we maintain a robust risk identification and mitigation program.

- Hazard operability and hazard identification studies are performed to identify and rank risks and safeguards.
- Safety assessments are performed to ensure specific hazards and mitigative measures can be identified.
- Simultaneous operations planning and field reviews are conducted to confirm proper communication and coordination between parties working on the same location at the same time.
- Pre-startup safety reviews are conducted when commissioning a new well pad or facility.
- An electronic management of change protocol is in place to evaluate proposed changes and verify that no new hazards are being introduced.
- Our regulator compliance program is used to track new rules, update our procedures and compliance requirements, and review any enforcement actions taken by our regulators against our peers.



Integrity of Gas Delivery Infrastructure

National Fuel's inspection and maintenance efforts are designed to meet or exceed regulatory requirements, and we continue to make significant investments to improve the safe operation of our systems. Corrosion, manufacturing defects, and construction-related defects often associated with early-vintage pipelines are leading causes of significant pipeline incidents. Our System Modernization Programs are created to identify and evaluate system threats or concerns and prioritize replacement that provides:

- Enhanced system reliability and safety.
- Construction, operations, and maintenance efficiencies.
- Annual GHG emissions reductions.
- Optimization of capital expenditures on larger scope projects with better economies of scale.

Downstream Segment System Modernization:

- We install narrower, medium-pressure pipes directly into old bare steel and wrought iron mains already slated for retirement. This reduces excavation and restoration costs and reduces the risk of future excavation damage to plastic mains. Expanding the medium-pressure system also allows us to relocate gas meters to the outside of homes and businesses, which improves safety and ease of operations and maintenance.
- Over the past five years, Distribution Corporation has **invested more than \$492 million** in the safety of our utility pipeline network, including system modernization.
- The Company does not have any known cast iron mains in service.

Midstream Segment System Modernization:

- To reduce the risk associated with early vintage pipelines, the Midstream segment has committed to the ongoing modernization of older bare steel pipelines, especially those pipelines operating at higher pressures in populated areas.
- Over the past five years, the Midstream segment has **invested more than \$543 million**, improving system safety and reliability. We expect this to remain a continued focus for the Company in the years to come.
- Advancement of composite pipe technology and installations in recent years has proven to be a cost-efficient and environmentally friendly means of system modernization; insertion of the composite pipe into existing bare steel pipelines allows for reduced earth disturbance, reduced impacts to water resources, and reduced capital costs.
- Since 2016, our Gas Storage Group has used its Storage Integrity Management Plan to assess and mitigate risk for the 1,100+ underground storage wells in our system.

Downstream System Modernization Progress

Bare Steel, Cast Iron, and Wrought Iron
Pipe Reduction since 1990

Mains Modernized

75%

5,015 Miles
Modernized (8,071 km)

Services Modernized

83%

197,574 Services
Modernized

Leak Management

An effective leak management program improves system safety and reduces GHG emissions.




Downstream Segment Leak Management Program

- Prompt identification of leaks, conditions that may lead to leaks, or other unintentional releases of natural gas from pipeline facilities
- Rapid responses to emergencies and thorough onsite investigations
- Accelerated leak surveys that exceed regulatory requirements and target facilities with higher potential for leaks or, in the event of a leak, more severe consequences
- Comprehensive leak classification and repair procedures for above-ground and below-ground leaks
- Program to identify risk-prone pipes for an accelerated replacement timeline
- Robust damage prevention program to minimize large volume leaks caused during excavation
- System modernization program and annual targets to replace leak-prone mains and services
- Annual leak backlog goals to drive year-over-year improvement, which are also tied to annual executive compensation goals



Midstream Segment Leak Patrol and Surveillance Program

- Regular foot and aerial patrols to look for indications of leakage and to identify any population growth or third-party encroachments along pipeline corridors
- Additional patrolling after severe weather events to evaluate rights-of-way conditions for erosion or land subsidence that could impact pipeline integrity or environmental resources
- Evaluating and participating in industry projects to assess viability of new technologies that may assist or enhance monitoring through the use of satellite imagery and data



Upstream Segment Leak Management Program

- Routine operator visits and inspections of well pad facilities
- Monthly AVO inspections of all facilities
- OGI cameras are used to conduct quarterly LDAR surveys of all well pads and facilities
- Aerial gas mapping Light Detection and Ranging (LiDAR) surveys to detect, locate, and quantify methane emissions
- Standard pad design with lower explosive limit (LEL) and ultrasonic leak detectors to automatically shut in the pad if a leak is detected
- Piloting continuous emissions monitors on three well pads to detect and quantify methane

Utility Leak Management Program

70.5% reduction in year-end outstanding leaks from 2020 to 2024.



Our Upstream Segment reduced fugitive emissions by **64.5%** from 2020 to 2024

Safety Management Systems

Pipeline Safety Management System (PSMS)

Our Downstream and Midstream segments have implemented a PSMS modeled after the American Petroleum Institute Recommended Practice 1173 (API RP 1173). At National Fuel, we utilize PSMS as one tool to continuously improve our safety culture, programs, and processes to achieve our goal of keeping everyone safe and preventing pipeline incidents.

Seneca’s Integrated Management System (IMS)

Seneca’s IMS is modeled after ISO Standards, Equitable Origin’s EO100™ Standard for Responsible Energy Development, and the International Finance Corporation Performance Standards. Although Seneca does not formally participate in or apply for certification in ISO 14001 (Environmental Management) or ISO 45001 (Occupational Health & Safety Management), those frameworks are used as the foundation for creating a complete management system for our upstream operations. Seneca also has a set of BMPs for critical operations such as containment construction and flowback operations.

Inspection and Maintenance Programs

Pipeline Programs	Integrity Assessment Inspection Methods and Technology	Upstream Segment Well Pad Programs
<ul style="list-style-type: none">Quarterly, semi-annual, and annual pipeline patrolsLeakage surveys, including business district, public buildings, and frost surveys, as well as additional targeted risk-based quarterly and semi-annual leak surveysMonthly leak surveys of schools, hospitals, and nursing homesAnnual regulator and valve inspectionsAnnual pressure regulating station inspectionsContinuous Supervisory Control and Data Acquisition (SCADA) and remote monitoring of operating pressuresAtmospheric corrosion inspectionsOdorant inspectionsBi-monthly and annual cathodic protection monitoringAnnual emergency valve inspectionsUnderwater inspections of waterbody crossingsIncident investigation and root cause analysisPlastic system leak analysis and remediation program	<ul style="list-style-type: none">In-Line Inspection (ILI) utilizes modern smart pigs that are propelled through the pipeline using gas pressure, air pressure, or a robotic propulsion to detect wall thickness, dents, internal and external metal loss, cracks, and crack-like features and manufacturing defects.Pressurized water (hydrotest) is used at a pressure of at least 1.5 times the maximum allowable operating pressure of the pipeline for a period of at least 8 hours.Direct assessment that uses specialized tools to identify potential coating defects that could result in corrosion, which are then excavated, examined, and repaired as required.Integrity assessments of pipelines in high-consequence areas are completed at a minimum of every seven years using the technology as specified above.	<ul style="list-style-type: none">Quarterly documented mechanical integrity inspectionsMonthly AVO inspectionsBi- or tri-annual greasing program for production treesPainting of equipment to prevent corrosionTesting of pressure relief valvesAnnual calibration and testing of lower explosive limit detectorsPlunger/bottom hole assembly inspectionsFuel meter calibrations and oil changesAnnual cleaning and calibrations of thermoelectric generators

Midstream and Downstream Construction Management

National Fuel maintains a robust design and construction management program. Our Downstream and Midstream segments utilize an engineering design and approval process to ensure the design of pipelines and facilities meet or exceed PHMSA's gas safety regulations and all applicable standards.

Our program includes several key elements to ensure the safe, reliable, and efficient design and construction of durable facilities. A centralized collection of engineering design, construction, and inspection manuals defines the specifications, procedures, and guidelines used across the organization.

Construction inspectors attend annual training, with select individuals earning industry certifications such as API 1169 for steel transmission facility inspectors, Certified Welding Inspector (CWI) from the American Welding Society (AWS) for welding inspectors, and NACE certification for coating inspectors.

Quality assurance and continuous improvement are supported through internal and external programs. These include the Construction Quality Management System (CQMS), which features internal audits, project assessments, and lessons learned. Third-party audits are conducted on radiography and non-destructive examination procedures for steel transmission facilities. Destructive and in-service material testing is performed to identify unknown or unconfirmed material properties, supporting accurate design calculations and operating pressures.

Additional program elements include:

- Design, testing, and installation of remote-control valves on select projects.
- Geohazard analysis and mitigation by civil and geotechnical engineers for facilities in landslide-prone areas.
- A pre-construction checklist to verify personnel qualifications and compliance with project-specific commissioning and abandonment procedures.
- Administration of Operator Qualifications, including training, testing, and performance evaluations for company and contractor personnel.
- A comprehensive commissioning and start-up procedure.



Integrity Management Programs National Fuel's integrity management programs improve system safety by identifying, assessing, and prioritizing risks to our pipeline systems and storage fields. These programs, in addition to our robust compliance programs, help the Company address risks to our systems and implement proactive safety measures.

	Distribution Integrity Management Program (DIMP)	Transmission Integrity Management Program (TIMP)	Storage Integrity Management Program (SIMP)	Well Plugging and Decommissioning Program
All Programs	<ul style="list-style-type: none">• Threat identification and remediation processes• Risk analysis and prioritization• Safety and risk mitigative measures• Continuous engagement with management to evaluate program effectiveness and potential improvements			
Program-Specific	<ul style="list-style-type: none">• Performance measures, metrics, and program data analysis• Management of change• Quality assurance program• System knowledge• Damage prevention program	<ul style="list-style-type: none">• Performance measures and metrics• Management of change• Quality assurance program• Assessment plan, including continual evaluation and reassessments• High consequence area identification• Pipeline integrity assessment method selection	<ul style="list-style-type: none">• Performance measures, metrics, and program data analysis• Management of change• Continual evaluation and reassessment• Annual wellhead and wellsite inspections, including wellhead safety zone characterization• Annual function testing of master gate and pipeline isolation valves• Casing integrity inspections using wireline tools• Corrosion impact evaluation from wellbore or pipeline fluids and solids• Third-party storage inventory verification• Periodic storage integrity meetings with a multifunctional group	<ul style="list-style-type: none">• Assurance of proper plugging with cement to permanently prevent the release of gas from the storage reservoir• Post plugging annual vent inspections



Social

Our People.....

60

Employee Attraction, Retention,
and Development.....

61

Workforce Highlights.....

63

Cultivating an Inclusive Culture

64

Our Vendors and Suppliers.....

66

Serving Our Communities & Customers.....

67

Energy Affordability

68

Energy Reliability

72

Giving Back to Our Communities.....

73

Our People

The ongoing success of National Fuel is the direct result of our employees’ hard work and dedication. We are united in our commitment to provide an essential service to our communities and customers. **National Fuel has approximately 2,350 employees across its New York, Pennsylvania, and Texas locations.** To best serve our stakeholders, the Company strives to build a highly skilled and effective team that reflects a diversity of perspectives, experiences, and backgrounds, and remains committed to a culture driven by respect and inclusion for all employees.



Newly Launched Workforce Development Opportunities

- Empower Mentoring Program
- Fuel for Success Quarterly Skills Training
- Town hall Career Conversations with Independent Directors



2024 Workforce Summary Highlights

- Employees covered by collective bargaining agreements – 47%
- Diverse executive and senior level officials¹ – 33%
- Females – 27%
- Racially/Ethnically Diverse – 9%
- Veterans – 4%
- Charitable Giving Program Participation – 47%



Investing in Our Employees

- Competitive compensation and benefits packages
- Prioritization of employee safety and wellness
- Encouragement of community involvement and volunteerism
- Career and leadership development opportunities
- Ongoing employee engagement
- Company-supported employee resource groups
- Mental health and wellness programs

Independent Directors Present to Employees

Two of our independent directors, Steve Finch and Rebecca Ranich, each presented to employees at our Company headquarters about their careers, leadership experience, and roles on our Board of Directors. Employees were invited to attend the town hall virtually or in-person and submit questions prior to and during the presentations. Each presentation demystified our Board and showed our employees how the Board works with management to address risk and strategic direction.



Employee Attraction, Retention, and Development

The Company aims to attract the best employees and to retain those employees by offering competitive benefits and compensation packages, as well as career development and training opportunities.¹ The Company also prioritizes employee safety and wellness; we work to improve employee work-life balance and create a safe, inclusive, and productive work environment for everyone.

Continuing to Build Programs that are Responsive to Employee Feedback

Our Human Resources team continuously looks to build programs in alignment with employee feedback. These programs offer employees the opportunity for professional growth and support continuous learning. Recently, the Company launched the Empower Mentoring Program, which aims to develop employees, improve self-awareness, expand employees' functional and leadership skills, and encourage cross-departmental networking through matching and supporting internal mentoring relationships. Additionally, the Company launched its Fuel for Success quarterly training program, which offers new resources and skills development for employees throughout the organization.



Healthcare Benefits	Financial Benefits	Insurance Benefits
<ul style="list-style-type: none">• Medical• Prescription drug• Dental• Vision• Inclusive fertility coverage• LGBTQ+ benefits guide	<ul style="list-style-type: none">• 401(k) with matching company contribution – including a Roth 401(k) Investment option• Company-funded retirement savings account• Annual variable cash bonus program for salaried employees• Flexible spending account for medical care reimbursement, daycare expenses, and adoption expenses• Employee referral bonus program• Retirement and financial wellness seminars	<ul style="list-style-type: none">• Life insurance• Accidental death and disability• Short-term disability• Long-term disability• Optional life insurance• Business travel accident
Lifestyle Programs	Career Development and Training	Community Involvement Encouraged
<ul style="list-style-type: none">• Hybrid in-office/remote work options, where feasible• Paid time off (“PTO”)• Alternative compressed work schedules• Flex hours• Family and medical leave, including parental leave• Lactation friendly workplace• Professional part-time employment track• “Dress for Your Day”• Paid bereavement leave, including for pregnancy loss• Mental health and wellbeing resources, including free employee therapy benefits and strategies for managers	<ul style="list-style-type: none">• Tuition aid program• Sponsorship for professional licensing• Corporate and technical training programs• Continuous talent review and succession planning• Professional development and cross-training discussions encouraged through annual performance reviews• Annual career development discussions with leadership team• Empower Mentoring Program• Fuel for Success skills training program• Rotational opportunities for engineering and business salaried employees	<ul style="list-style-type: none">• Days of Doing corporate community service events during work hours• Faces of Fuel and Seneca Serves volunteer programs• Matching charitable giving program• Employee Resource Groups• Paid military leave²• Support for employee involvement in local non-profit and community boards

¹ Our benefits packages and career development opportunities may vary depending on type of employee (e.g., full-time versus part-time, salaried versus hourly, union versus non-union), date of hire and/or position.
² Company will pay differential of full pay less military pay for up to two weeks per year so employee experiences no loss of income for full-time employees.

Empower Mentoring Program

New Connections



Being at National Fuel for less than a year, I've gained a lasting friendship and professional relationship with my mentor. It's been a great opportunity to grow my network, learn about the organization, and share knowledge.

Jason – Program Manager, IT

The program has given us an opportunity to connect candidly and allows us to engage in meaningful dialogue. By openly sharing my lived experiences, I'm able to provide insight to help Jason succeed at National Fuel.

Val – General Manager, HR

Wider Perspectives



I joined the program to grow my understanding of how National Fuel and the natural gas industry operates. Connecting with Chris has given me a broader perspective and helps me better represent the Company confidently in conversations with customers, co-workers, and my family and friends.

Eric – Consumer Business Specialist II, Consumer Business

Eric has been eager to learn more about departments and business units, so my goal is to facilitate learning opportunities in different areas of the Company. I believe the mentoring program is a valuable resource for navigating one's career, so I am happy to support Eric during his career journey.

Chris – General Manager, Gas Supply Administration

Professional Development



My mentor's experience and insight into the Company's inner workings has helped improve my productivity, engage in more effective dialogue with different departments, and position myself to advance my career. Gen has become an ally I can learn from and who can help me spot professional growth opportunities.

Kat – Associate Counsel, Legal

An unexpected perk of this program is seeing National Fuel through the eyes of my mentee, which enhances my awareness and contributes to my growth and effectiveness as a manager. I'm thankful for our enriching, mutually beneficial relationship.

Gen – General Manager, Commercial Services

Employee Development

National Fuel is committed to providing our employees with career development tools and resources to solve future industry challenges and deliver on our customer commitments. In addition to the work experiences and career feedback we provide internally, we have also established voluntary professional development programs that foster a growth mindset and support continuous learning and improvement.

Empower Mentoring Program

Launched in 2024, the Empower Mentoring Program matches employees with qualified mentors based on which skills the mentees would like to improve. The program aims to provide cross-departmental networking while helping employees develop professionally, improve self-awareness, and expand their functional and leadership skills.

Fuel for Success Professional Skills Development Program

Fuel for Success is a quarterly training program that offers employees the opportunity to access new resources and develop a particular skill.¹ Each quarter's training is structured around a unique skill to provide a targeted and interactive workshop experience.

Career Growth through Community Leadership Programs

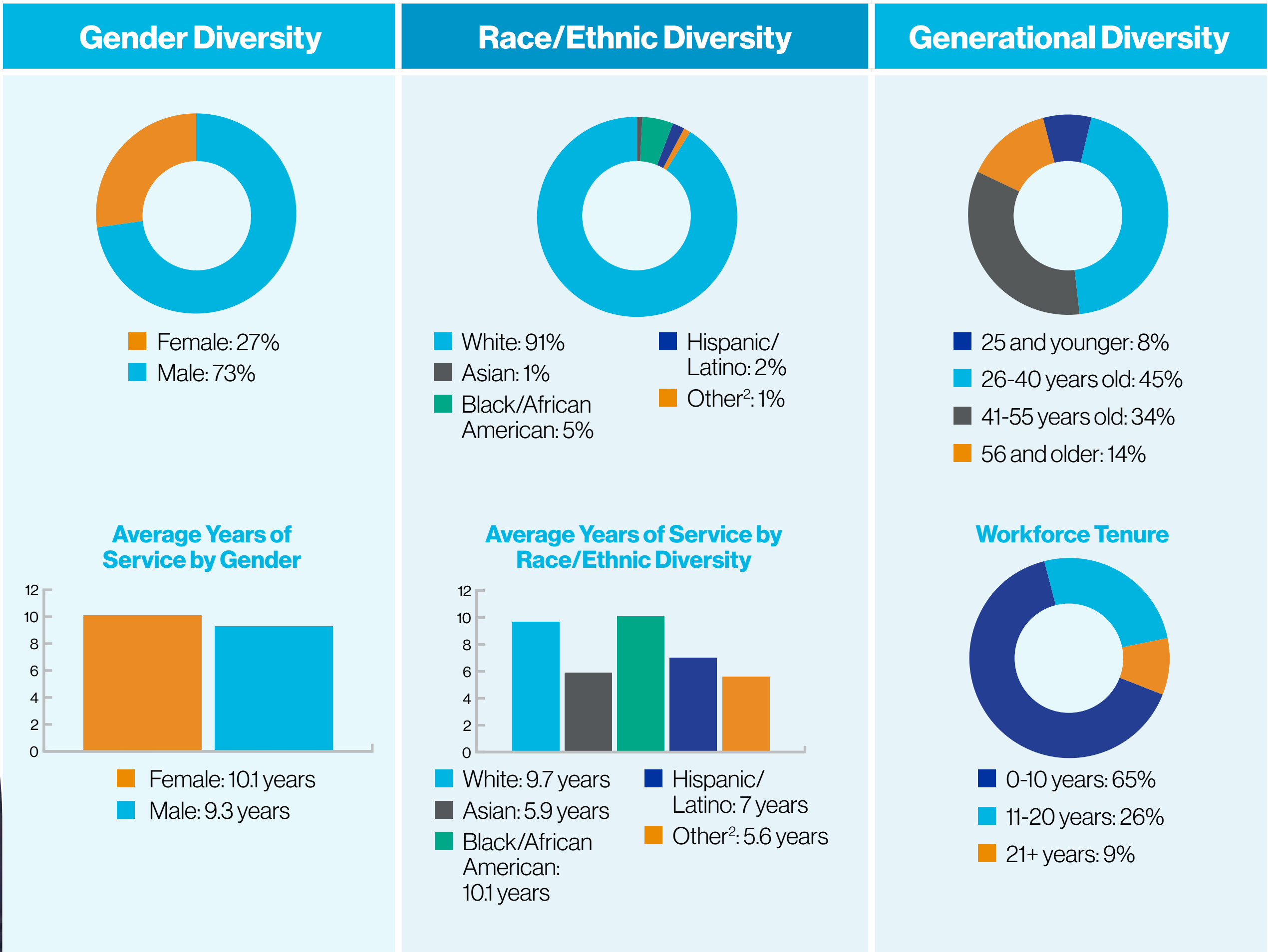
The Company sponsors and nominates employees to participate in five different area leadership programs. Our programs aim to:

- Encourage employees to assess and develop their own professional skill sets
- Engage with our communities
- Help the Company identify leadership talent

¹ Fuel for Success is open to all salaried employees in our Downstream and Midstream Segments.

Workforce Highlights

National Fuel tracks diversity indicators and shares that demographic data within this Report. This demographic data provides a snapshot of our workforce and helps us identify trends as we continue to build and embrace an inclusive culture.¹



Retiring Employees' Average Years of Service 31.7 years	Executive Team's Average Years of Service 21.9 years
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¹ Total values may not equal 100 due to conventional rounding.
² Other includes the following classifications: Native American or Alaska Native, Native Hawaiian or Pacific Islander, and Two or More Races.

Cultivating an Inclusive Culture

National Fuel is committed to equal opportunity for all and building an inclusive and welcoming work environment that represents our employees’ diverse perspectives and backgrounds. The Company aims to foster a culture where all employees feel like they belong and have the opportunity to succeed, and we remain steadfast in our inclusive approach to recruitment, training, and workforce development.

- **Diversity:** A blending of perspectives, experiences, and identities within our teams.
- **Inclusion:** A fostering of collaborative and productive work environments that value contributions and perspectives from all employees.

Polices that Support our Commitment to Inclusion

To address the social risks inherent in any workplace, the Company has developed a robust compliance program and set of policies. These policies are designed to create a safe, inclusive, and productive work environment and reinforce our commitment to workplace inclusion.

- **Employee Handbook Policies:** Include equal employment opportunity commitments and nondiscrimination policies that communicate the Company’s expectations with respect to maintaining a professional workplace free of harassment. Additionally, these policies are displayed at all Company locations and reinforced with annual messaging from our CEO.
- **Nondiscrimination and Anti-Harassment Policy¹:** Prohibits discrimination or harassment against any employee or applicant based on sex, race/ethnicity, or other protected categories. This policy is sent to employees annually through the employee survey and attestation process.
- **Labor and Human Rights Policy:** Guided by the International Labor Organization’s (ILO) core labor principles concerning (1) nondiscrimination, (2) freedom of association and collective bargaining, (3) forced labor, and (4) underage workers in the workplace. The policy also contains information about grievance reporting.

- **Supplier Code of Conduct Policy:** Reinforces expectation that suppliers uphold our Labor and Human Rights Policy; follow environmental, health, and safety standards; and comply with anti-corruption expectations when working with the Company.

Raising Awareness Through Training

- **Harassment and Discrimination Prevention Training:** Educates on and reinforces a commitment to a harassment-free workplace, which is further supported through regular communication of policies prohibiting discriminatory practices.
- **Manager Bias Training Prior to Performance Appraisal Process:** Provides continuing education for managers to ensure that opportunities within teams are consistent and fair and to evaluate processes for biases or inequities – conscious or unconscious.

Pay Equity

National Fuel continuously focuses on providing pay equity for all employees. As part of this focus, we have implemented the following practices:

- Salary history is not requested from job applicants to prevent perpetuating prior pay disparity.
- Comprehensive pay analysis for new hires, which includes an internal equity review for those performing similar functions.
- An external consultant provides regular benchmark salary data for job functions.
- HR reviews salary increases and promotion recommendations with senior leadership to ensure equity and consistency across business units.

Community Outreach Focused on Diverse Recruitment

National Fuel aims to cast a wide net of potential candidates to ensure we are considering all qualified individuals. We collaborate with community groups and organizations to help promote awareness of job opportunities within the communities where we operate.

Utility Technician Intern-in-Training Program

Onsite paid summer internship program for high school students with professional development workshops.

The Company provides wraparound services such as drivers’ education and transportation to work locations for program participants. Students are exposed to different job opportunities within the Operations department and learn about different career paths within the gas utility. Program graduates are equipped to start a career in the gas utility following program completion, and they can be eligible to receive an offer of full-time employment following their high school graduation.

Corporate Partner for “Say Yes” Apprenticeship Program

Post-graduation program that connects City of Buffalo students to career pathways through work-based learning.

The students attend a 2-year college, taking classes that align with their job training. While the students are in school, we provide them with hands-on experience and access to a sustainable wage. In 2024, the Company welcomed apprentices across various departments, with two continuing to grow their careers within the organization.



¹ The Company’s Nondiscrimination and Anti-Harassment Policy lists the following protected categories: age, race, creed or religion, color, national origin, sexual orientation, gender identity or expression, military or veteran status, sex or gender (including pregnancy, childbirth or related conditions), disability, predisposing genetic characteristics, familial status, marital status, status as a victim of domestic violence, and employee or dependent’s reproductive health decision making.

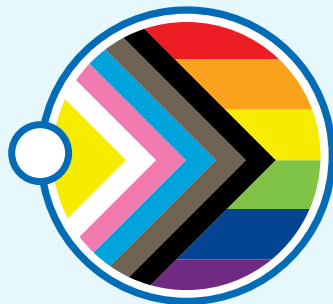
Employee Resource Groups



EDGEFuel



75 Members
34% Participation¹



PrideFuel&Allies



37 Members



FEMALEFuel



127 Members
20% Participation¹



VetFuel



53 Members
51% Participation¹

Employee Resource Group (ERG) Grant Program

Our Company's ERGs fuel positive change in our communities by nominating non-profit organizations that resonate with their missions to receive grants of up to \$10,000 from our Company Foundation.

Building an Inclusive Workplace

Employee Resource Groups

Our four employee resource groups (ERGs) are voluntary, employee-led groups comprised of individuals who self-identify based on specific backgrounds, interests, and/or demographic factors. Our ERGs are open to all employees who wish to participate or show support. The groups provide employees opportunities for professional development, networking, mentoring, allyship, and community involvement. The ERGs also serve as a vehicle for employees to communicate their perspectives and requests directly to senior management, as each group has an executive sponsor and an annual meeting with the senior executive team.

Inclusive Onboarding Experience

- **Self-Identification:** Strengthening our culture of belonging means creating opportunities for our workforce to feel seen and included. We offer employees the choice to self-identify within specific demographic categories to better understand and support the diversity of our workforce. During the application process, employees have the option to confidentially share personal information across a range of both inherent and non-visible dimensions of diversity including:
 - Gender
 - Race/Ethnicity
 - Disability status
 - Veteran status
 - Sexual Orientation²
- **Promoting Employee Resource Groups:** New employees are made aware of our resource groups and how they can get involved. Groups are open to all employees regardless of demographics.
- **Inclusive Benefits Review:** Benefit options provided to new employees include family leave options (regardless of gender) and our LGBTQ+ benefits guide.

Corporate Equality Index

The Corporate Equality Index is a national benchmarking tool on corporate policies, practices, and benefits pertinent to the LGBTQ+ community. With the help of PrideFuel&Allies, the Company submitted information and received full points for employment nondiscrimination practices, transgender inclusive benefits, the LGBTQ+ benefits guide, internal training procedures, LGBTQ+ data collection, transgender workplace best practices, ERGs, and outreach and engagement with the LGBTQ+ community.

Support for Unionized Workforce

National Fuel respects its employees' rights 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. During calendar year 2024, National Fuel did not incur any work stoppages (strikes or lockouts) and therefore experienced zero idle days for the year.



Employees Covered Under Collective Bargaining Agreements

Union – 47% | Non-Union – 53%

¹ 2024 participation rates provided based on self-identified demographic data and do not include allies. Total participation rates for PrideFuel, the Company's LGBTQ+ ERG, are not provided because LGBTQ+ employees may choose to self-identify on a voluntary basis, so the entire potential population is data deficient.
² Self-identification of sexual orientation is only listed within our Pennsylvania application process.

Our Vendors and Suppliers

National Fuel is committed to building a strong supplier pool that drives our overall goal of achieving the best value when procuring goods and services. When possible, we try to engage local suppliers to better support the communities that we serve.

Supplier Expectations

Our procurement efforts are driven by price, return on investment, timely delivery of goods and services, ongoing support, and other considerations that reflect our values and objectives. Those values and objectives include our expectation that suppliers comply with our [Code of Business Conduct and Ethics](#) and [Supplier Code of Conduct Policy](#). We send annual mailings that relay those expectations and our [Labor and Human Rights Policy](#).

Building a Diverse Supplier Network

Building a strong supplier pool includes broadening the number of potential suppliers to achieve the best value through competitive procurement. This year, National Fuel launched a [Supplier Diversity Framework](#). The purpose of this framework is to support regulatory reporting requirements, identify and encourage diverse suppliers to participate in our procurement efforts, and create a positive impact in the communities served by National Fuel or otherwise located in our operational footprint.

The Company is committed to fairly considering and, when appropriate, utilizing Diverse Suppliers to support our strategic sourcing of goods and services. Diverse suppliers that seek to do business with the Company must provide high-quality goods and services that are competitively priced, reliable, and conform to a specified business need.



Engaging with Local Diverse Suppliers

Black Business Market

During Black History Month, EDGEFuel organized a Black Business Market where employees were invited to shop and support local minority business at the Company’s headquarters.

Erie County Level Up

National Fuel is a participant of Erie County’s Level Up initiative that aims to create contract opportunities for business owners who operate a business within a low-income zip code across the Western New York region.

Visit www4.erie.gov/levelup for more information.

Recognized Diverse Supplier Certifications¹:

- | | | | |
|---------------------------------------|------------------------------------|---|---|
| • Small Business Enterprises | • Women-Owned Business Enterprises | • Service-Disabled Veteran Business Enterprises | • Disability/Physically Challenged-Owned Business Enterprises |
| • Minority-Owned Business Enterprises | • LGBTQ Business Enterprises | • Veteran Business Enterprises | |

¹ Diverse Suppliers who wish to contract with National Fuel pursuant to this Framework must have a diverse status certification issued from an approved certifying agency.

Serving our Communities and Customers

For more than 120 years, National Fuel has provided safe, reliable, and affordable gas service to the communities where we live and work. Our relationships with our customers and local communities are central to our mission and ongoing success as a Company.

Within our operating territories, where customers frequently experience very cold days for prolonged periods of time, our reliable, weather-hardened infrastructure is critical to serving the region's energy needs. The resiliency of the Company's pipeline systems, coupled with access to affordable energy supplies due to regional shale development, ensures that the Company continues to provide affordable and reliable energy to our customers when they need it most.



Our local employees promptly answer customer service calls in facilities within our service territory. Our customer-focused approach has led to high levels of customer satisfaction and exceptionally low rates of customer complaints.

Utility's Residential Customer Satisfaction Rates¹

- New York: 92.7%
- Pennsylvania: 89.1%



We prioritize affordability for our customers by passing on the direct benefit of lower energy costs due to regional natural gas shale development. Additionally, with the support of our state commissions, our Utility has developed and administers programs designed to reduce energy costs for low-income utility customers.

Utility's Residential Delivery Gas Bills²

- Ranked #1 for New York rates
- Ranked #1 for Pennsylvania rates



Our track record of minimal operational disruptions demonstrates the strength and dependability of our facilities despite the severe winter weather common to our geographic footprint. We are committed to making ongoing investments to help ensure the long-term safety, reliability, and integrity of our system and assets, ensuring consistent service for our customers.

Continued Reliable Service

- Downstream Segment – Near 100% utility service reliability³
- Midstream Segment – Near 100% reliability during fiscal year 2024 and served peak demand
- Upstream Segment – Strategic planning and coordination to minimize weather-related production interruptions



Delivering affordable regional natural gas

Resilient weather-hardened infrastructure

Safety messaging and community engagement

Locally staffed customer service call centers



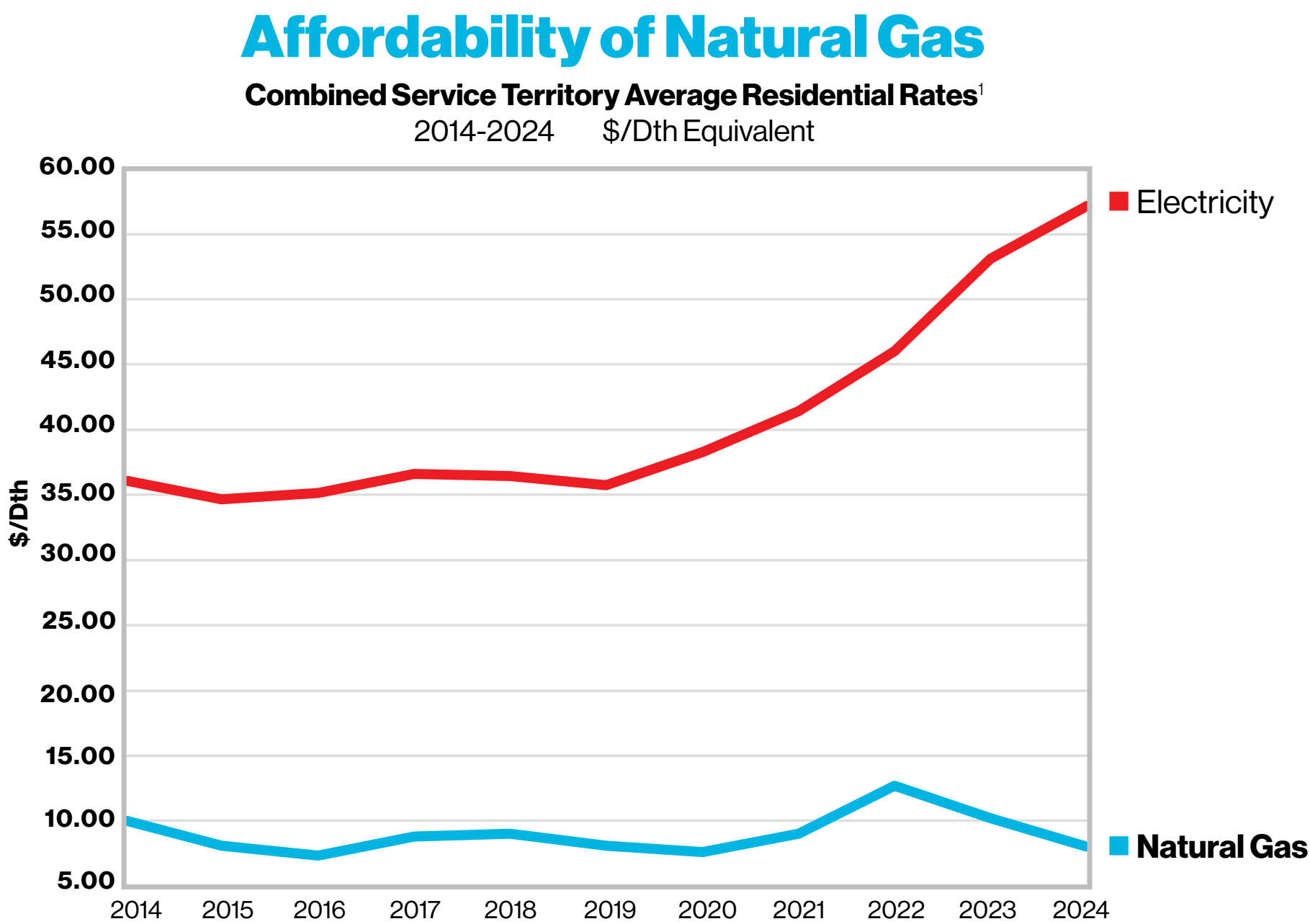
Utility customer end-use efficiency and conservation incentive programs

Continued focus on environmental stewardship

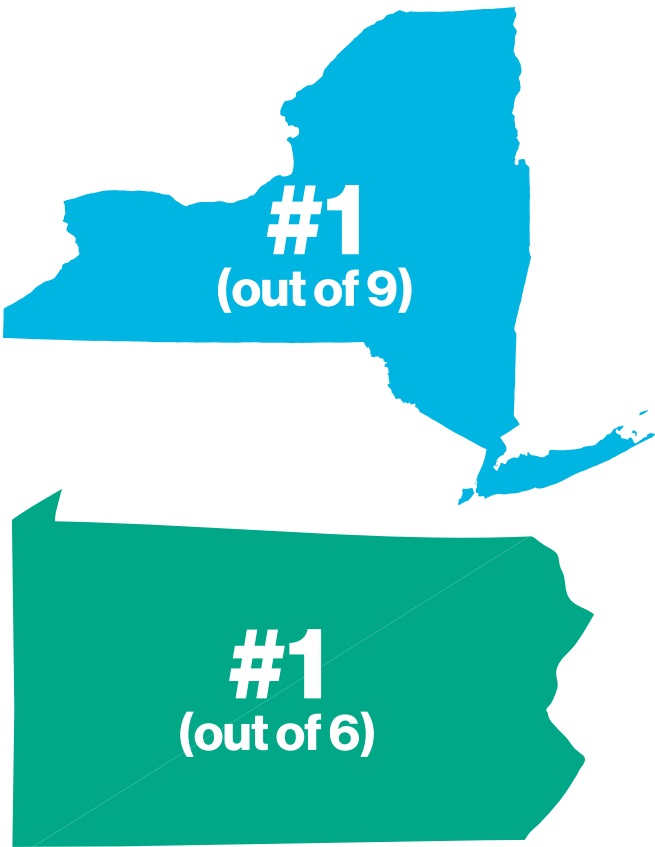
¹ Residential satisfaction rates reflect fiscal year end results.
² For New York, based on 2024 or 2023 data available on company websites as required by the NYPSC. For Pennsylvania, based on analysis of 2025 PAPUC Annual Rate Comparison Report, which includes data for average monthly residential bills for 2024.
³ Value is for the 12 months ended December 31, 2023 and represents the percentage of New York Distribution customers with no unscheduled outages due to the Company's error.

Energy Affordability

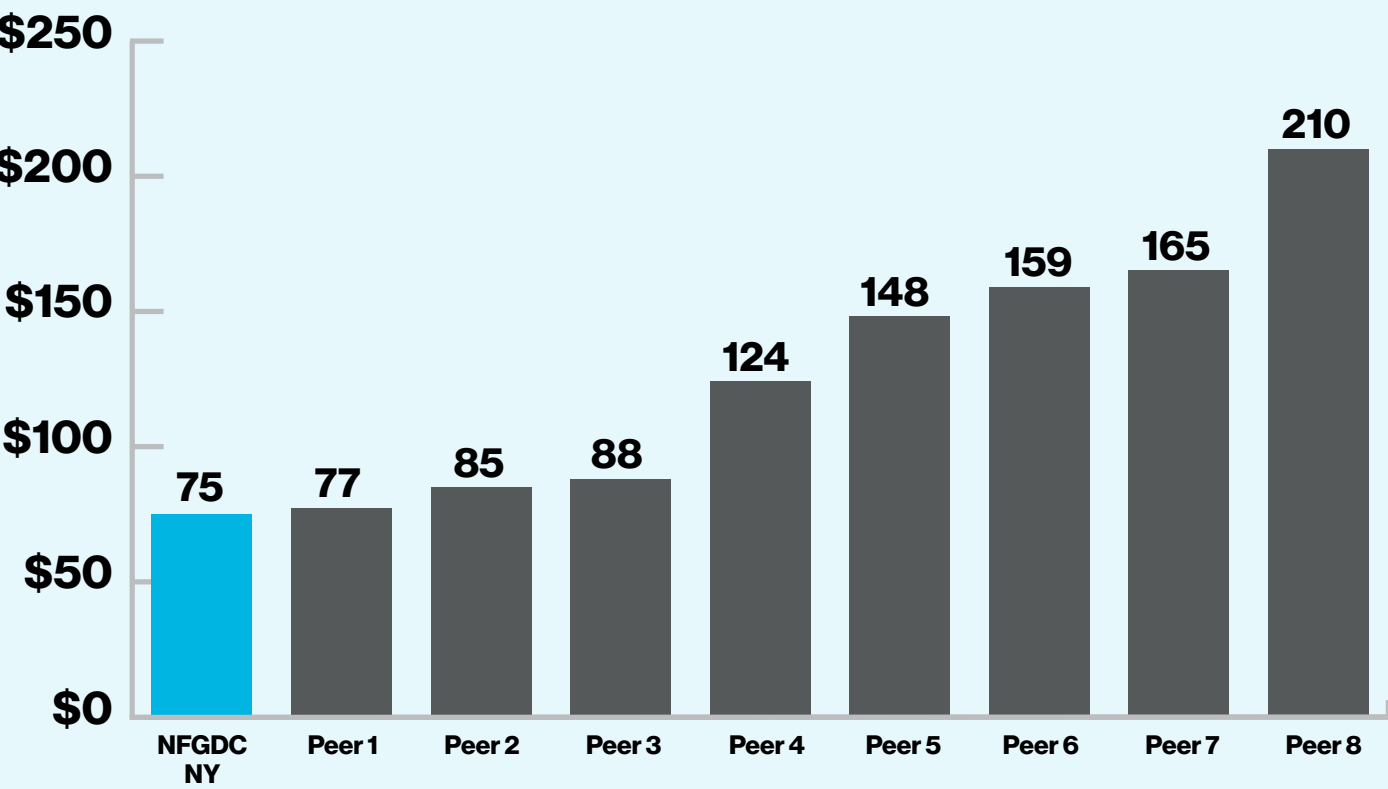
Our service areas are faced with severe weather, aging buildings, and struggling economies, making affordable and reliable energy of paramount importance to our customers. **Natural gas has been and continues to be the most affordable source of energy in our service territory – up to seven times cheaper than electricity.**



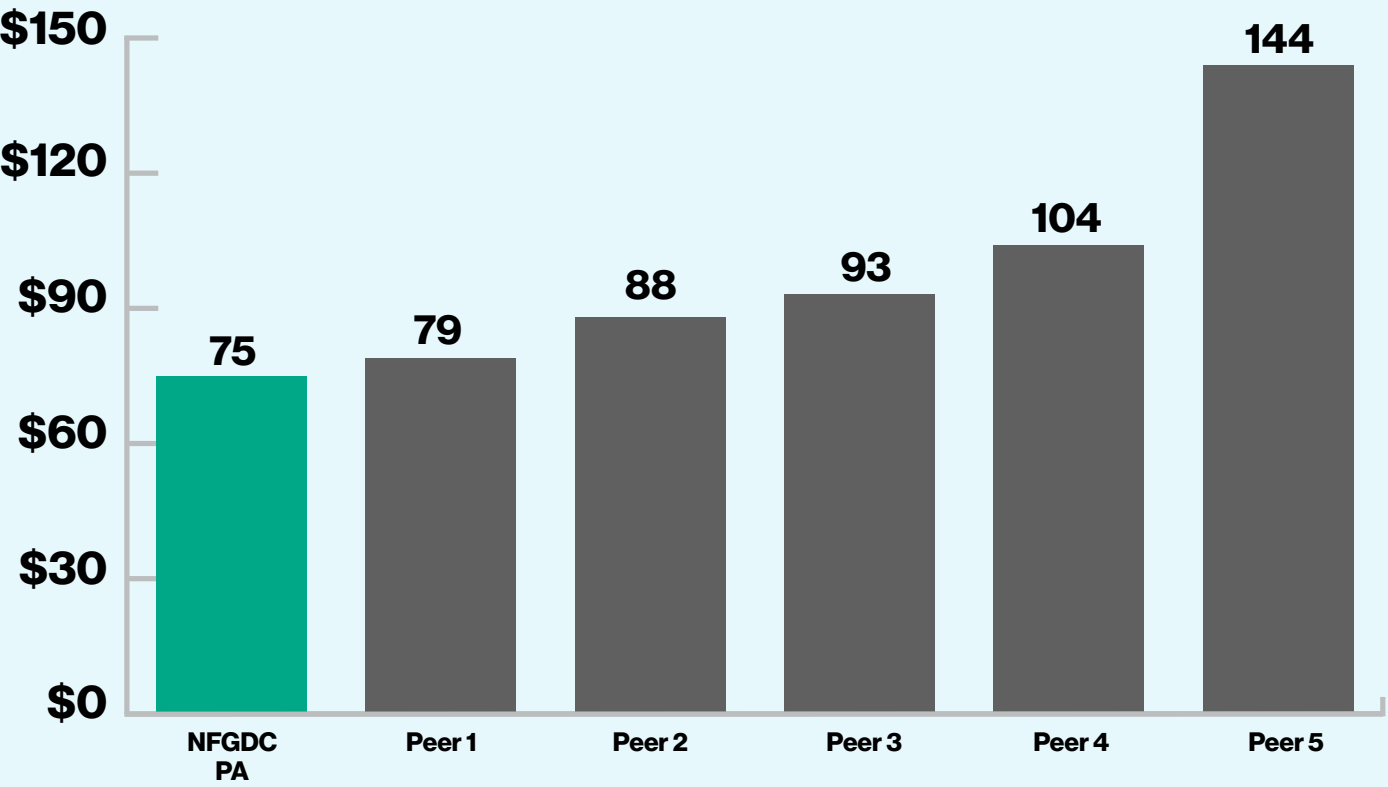
We offer our customers the **lowest gas bills** out of all the large gas utilities in New York² and Pennsylvania³



New York Large Gas Utilities Monthly Bill Residential Heating (based on 100 Mcf annually)⁴



Pennsylvania Large Gas Utilities Monthly Bill Residential Heating (based on 15 Mcf monthly)⁵



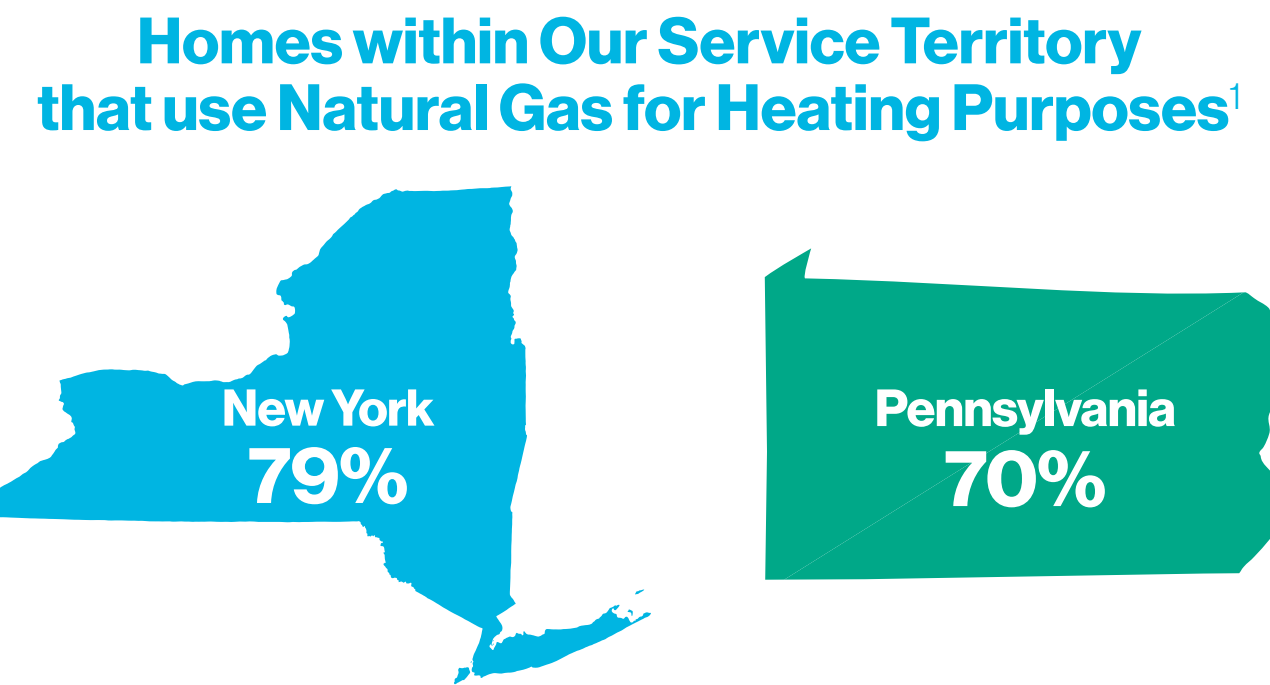
¹ Average residential rates represent gas costs to customers which include the following costs, demand, commodity and a twelve-month average of delivery costs.
² Based on 2024 or 2023 data available on company websites as required by the NYPSC and 100 Mcf annually.
³ Based on analysis of 2025 PAPUC Annual Rate Comparison Report, which includes data for average monthly residential bills for 2024, and 15 Mcf monthly.
⁴ Based on 2024 average monthly residential bill data posted on company websites required by the NYPSC. Peer 8 is based on 2023 due to unavailable data for 2024.
⁵ Based on analysis of 2025 PAPUC Annual Rate Comparison Report, which includes data for average monthly residential bills for 2024.

Challenges for Our Customers

Heightened winter energy demand and low incomes exacerbate the need for affordable and reliable energy.

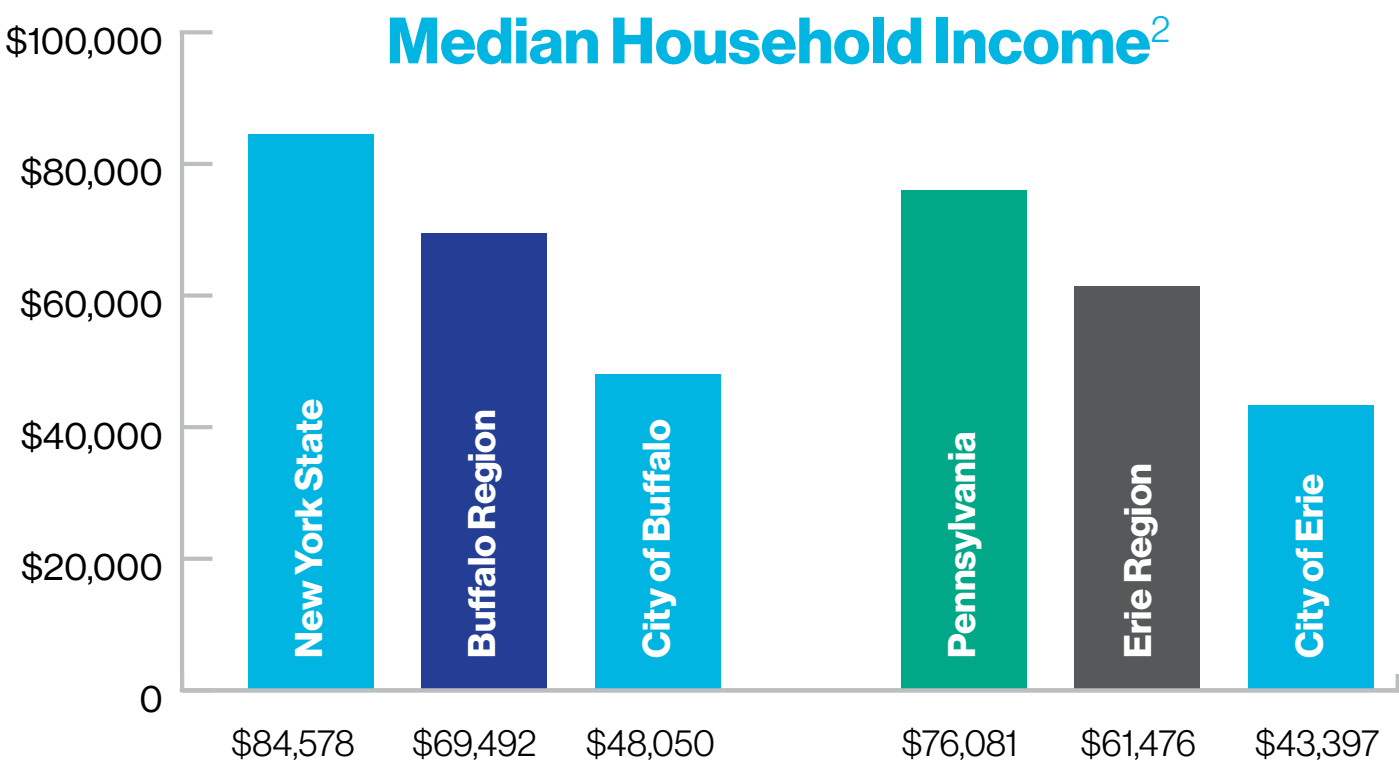
Severe Weather

Our service territories are known for harsh winters up to 45% colder than downstate New York, but our weather-hardened infrastructure offers customers a reliable and resilient heating option during extreme winter storms. These weather events can impact demand and cause market prices for energy to fluctuate across our service territory. While the wholesale price of natural gas is out of our control, our Utility’s tariffs include a weather normalization adjustment (“WNA”) mechanism. The WNA mechanism is active during the winter heating season and helps moderate the effects of winter-driven usage variability, keeping gas bills predictable for our customers and our company.



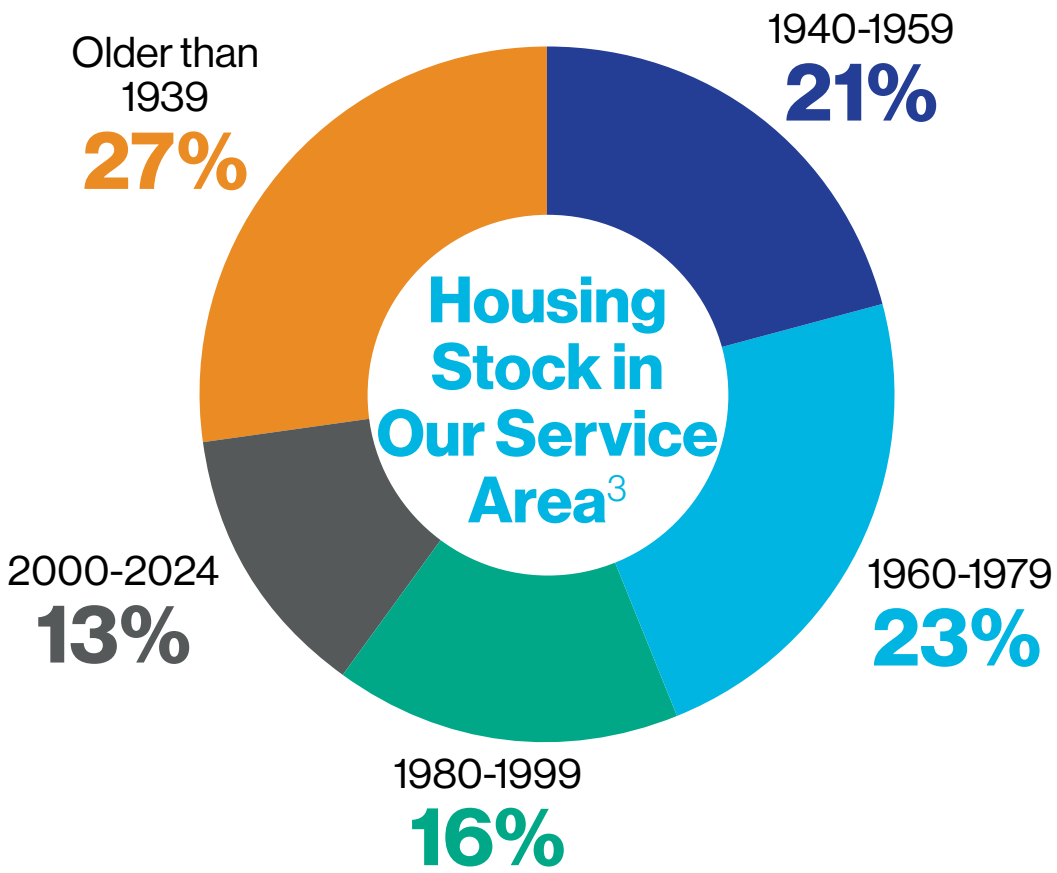
Difficult Economic Conditions

Our Utility primarily serves the Buffalo, NY and Erie, PA markets. Although this region has seen some slight improvements after a long economic decline that began in the 1970s, the median household income in and around Buffalo and Erie lag behind the median of their respective states and the country. Not all customers can afford the rising cost of electricity; they need an affordable option to keep themselves and their families warm, and natural gas provides that.



Aging Housing Stock

Over 70% of the homes in our service territory were constructed before 1980. The age and condition of the housing stock in our service territory means that our customers would need to pay more to retrofit and weatherize their homes. Additionally, older homes often have leaky gaps and cracks, poor insulation, and single-pane windows, making them less energy efficient as heat easily escapes the buildings. Requiring more energy to keep their homes warm only increases Western New Yorkers’ and Pennsylvanians’ need for affordable energy sources like natural gas.



1 Based on customer profiles.
2 2024 figures from the U.S. Census Bureau.
3 2023 figures from the U.S. Census Bureau.



External Factors Impacting Affordability

Although we strive to provide affordable service to all our customers, there are some aspects of the energy industry beyond our control, such as commodity prices and regulatory impact.

Fluctuating Commodity Prices

Costs to purchase, transport, store, and deliver natural gas supplies are passed along to our Utility's customers through a commodity supply charge. Volatility in national and regional commodity markets, upstream disruptions in the natural gas supply chain, pipeline constraints, and general imbalances in supply and demand can increase the cost of natural gas supplies and, ultimately, the rate charged to customers as natural gas is consumed.

Costly Regulation

Our Utility's delivery rates are regulated and set by the state utility commissions in New York and Pennsylvania. While the rate-setting process is designed to produce rates that are just and reasonable for all customers, the ratemaking process is subject to political and policy influences that may apply upward pressure on customer rates. Several other circumstances exist where legislation and government policy at the federal, state, and local levels could directly or indirectly impact our rates. These may include environmental regulations that restrict natural gas production or the development and operation of transmission pipelines; the implementation of additional taxes, including a carbon tax, on natural gas services; and income tax policy.

Promoting Efficiency to Reduce Gas Bills

Our Utility continues to focus on promoting end-use energy efficiency in both New York and Pennsylvania. We partner with our regulators, industry groups, and local businesses to develop and administer outreach and incentive programs designed to reduce our customers' energy usage, which in turn reduces their energy cost.

Driving Customer Savings with Efficiency Programs

Our New York Conservation Incentive Program (CIP) and Pennsylvania Low-Income Usage Reduction Program (LIURP) are funded by ratepayers through monthly bill surcharges in the applicable states. The programs are comprised of the following initiatives:

- **Rebate Programs (NY & PA):** Equipment replacement programs that offer rebate incentives to replace aging and inefficient space, water and process heating equipment with high efficiency appliances.
- **Outreach and Education (NY & PA):** Includes marketing across a variety of platforms and social media to educate customers about their energy usage habits, promote energy efficiency programs, increase awareness around payment assistance programs, and provide energy savings tips, including weatherization information. Additionally, our Utility has launched campaigns to engage with local HVAC contractors to discuss industry trends, policies, and incentivization programs.
- **EmPower+ Program (NY):** Available to low- and moderate-income households and provides subsidized or no-cost energy efficiency solutions to low-income households and a 25-75% cost share towards energy efficiency measures for moderate-income households. The main goal of EmPower+ is to conserve energy, reduce residential energy bills, and improve the health, safety, and comfort levels of participants.

The Utility **invested \$64+ million in energy efficiency programs** from 2020-2024 and plans to spend \$19 million on efficiency programs in 2025.

Advancing and Optimizing Energy Technologies

Our Utility is committed to helping both residential and non-residential customers optimize their energy usage. The Energy Services team performs research, leverages technical reviews, and pursues pilot projects related to optimizing energy usage, including:

- Expanding the use of hybrid heating system configurations (pairing gas-fired equipment with air source heat pump technology) through the CIP
- Evaluating gas absorption heat pump technology for residential customers
- Developing geothermal and other thermal energy technology as a service
- Participating, with GTI Energy and other industry groups, in ongoing research, design, and development projects focused on helping customers adopt technical innovations that save money, energy, and reduce emissions

Moreover, Energy Services collaborates with a New York State Joint Utilities group and New York State Energy Research and Development Authority (NYSERDA) to review and approve changes to the Technical Resource Manual that standardizes the way energy savings are estimated and achieved through statewide and regional energy efficiency programs.

Customer Gas Savings from Efficiency Measures

NY CIP Gross Annual Savings (MMbtu)¹

	2023 ²	2024
Residential Rebate Program	152,154	112,108
Non-Residential Rebate Program	25,501	98,079
LMI	25,395	24,523

1 Gas savings are calculated on a gross basis consistent with the New York energy efficiency proceeding (NY 07-M-0458).
2 2023 numbers were restated to align with the reconciliation of the disadvantaged community report as required by the New York Public Service Commission.

Features of an Energy Efficient Home

1. **Hybrid Heating System:** Combination of a heat pump and a traditional furnace, allows for efficient energy use based on weather conditions and energy demand

2. **Heat Recovery Ventilation:** Distributes fresh air throughout the home

3. **Tankless Hot Water System:** Endless hot water on demand, heated efficiently

4. **Tier Three Appliances:** Represents high-efficiency household appliances

5. **Smart Thermostat:** Wi-Fi enabled device that remotely controls heating and cooling temperatures

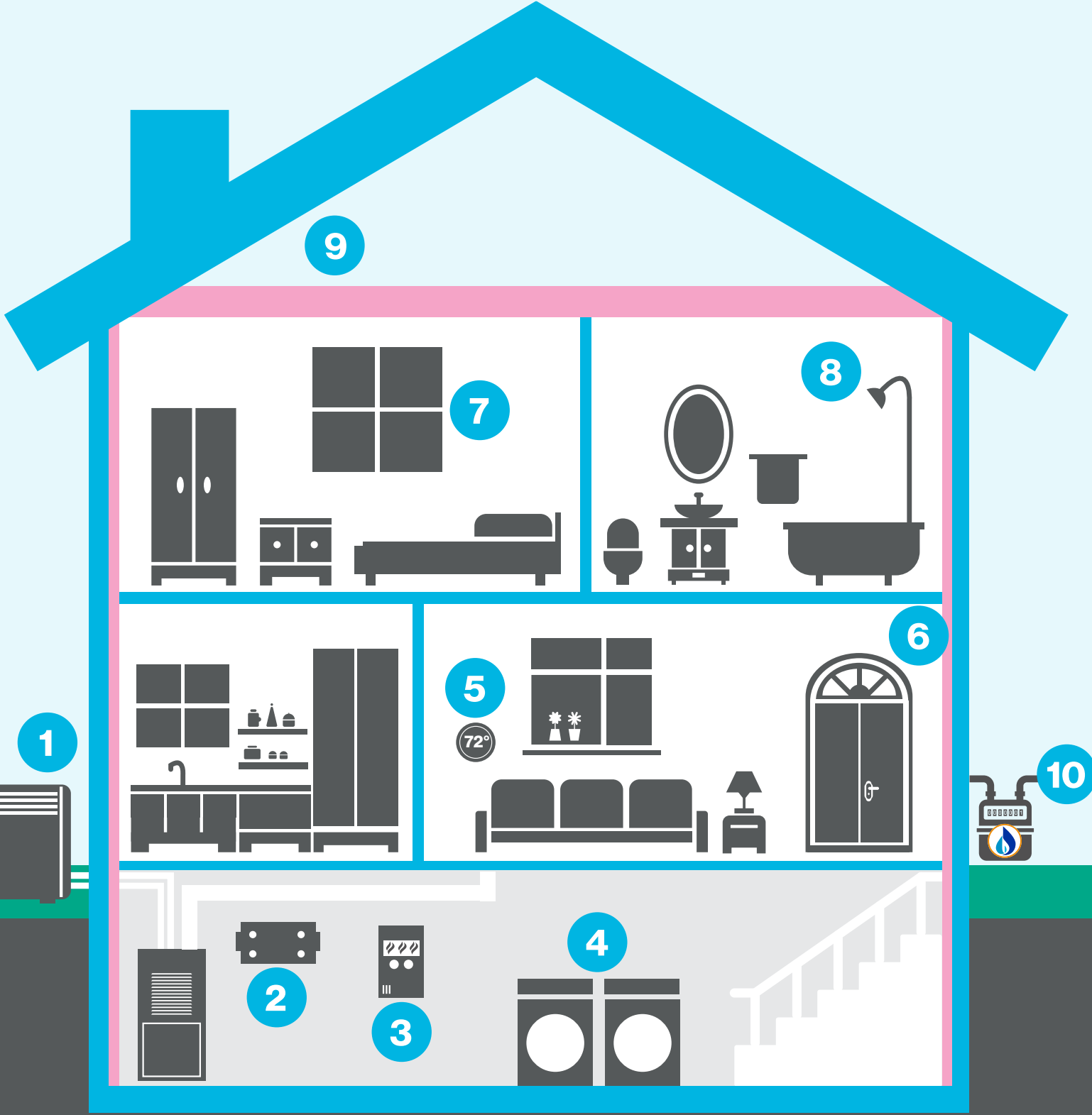
6. **Air Sealing:** Prevents air leakage from gaps in the building envelope

7. **High Performance Doors and Windows:** Reduces heat loss and increases daylight into the home

8. **Low-Flow Water Fixtures:** Reduces amount of hot water being utilized

9. **Double Insulation:** Reduces heating and cooling demand

10. **Gas Meter:** Measures natural gas deliveries

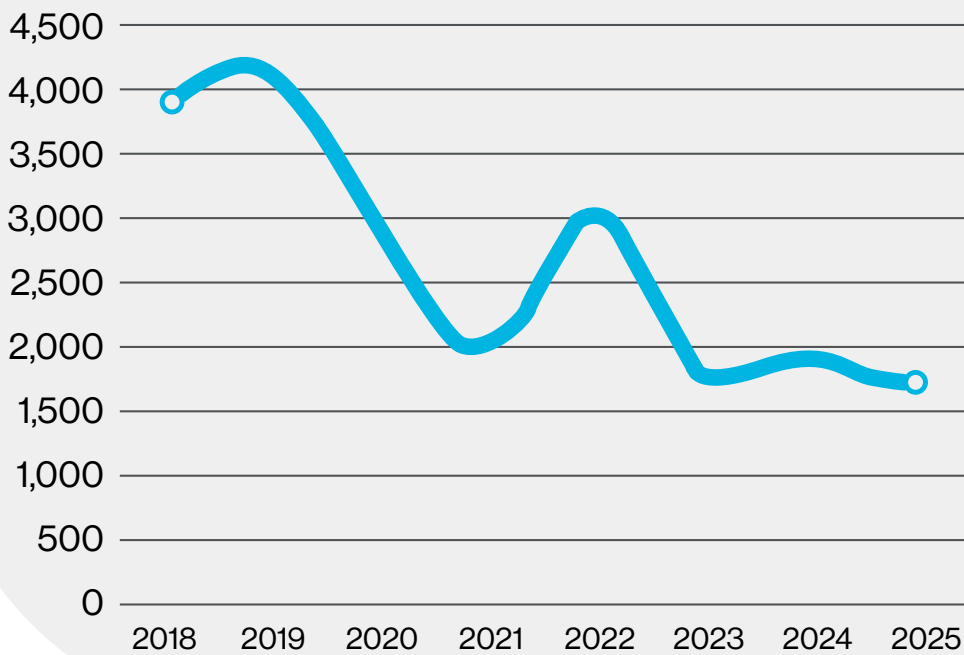


Energy Reliability

As electricity demand continues to outpace supply, natural gas offers an indispensable alternative to electrification. Within our New York and Pennsylvania service territories, **we provide natural gas service to approximately 93% and 84% of households**, respectively. These customers rely on us for daily necessities like heating. Especially important during our long and cold winters, our Utility is proud to deliver near **100% service reliability** to our customers.



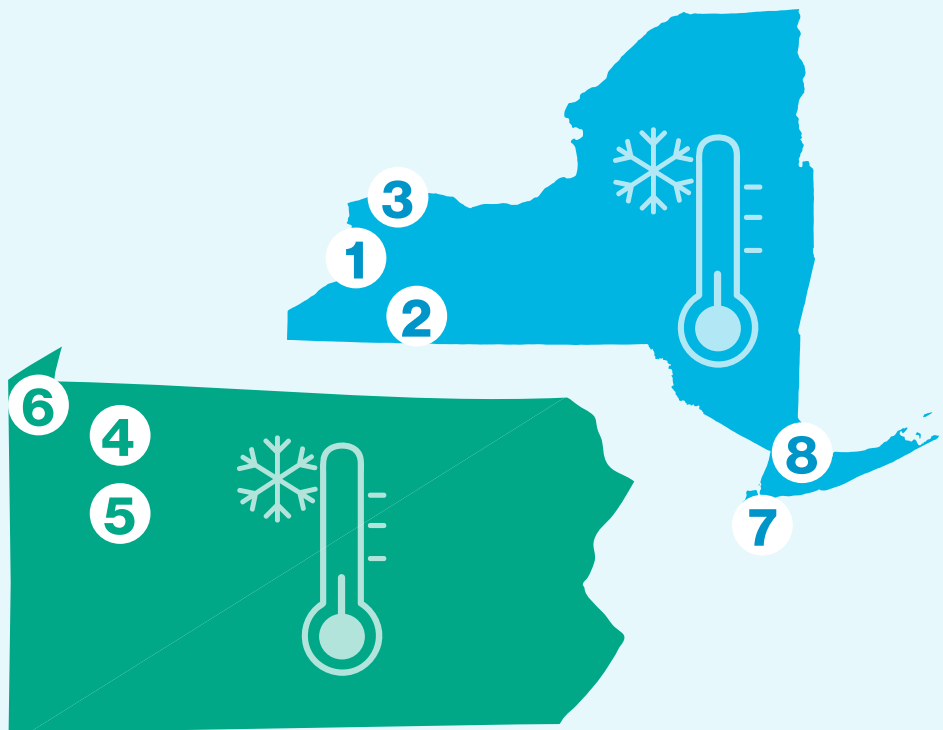
Thinning Margin Between Available and Required Electricity Resources



“...statewide reliability margins continue to shrink over the next ten years due to forecasted growth in demand coupled with retirements of conventional generation that are outpacing renewable generation additions.” – NYISO 2025 Power Trends Report

[Read the NYISO 2025 Power Trends Report here](#)

Colder Regions Need A Reliable Energy Source



Annual Minimum Temperature (°F)¹
(1994-2024 average)

Our Service Territory		Downstate NY	
1. Buffalo, NY	-2°F	7. NYC (JFK)	8°F
2. Jamestown, NY	-9°F	8. NYC (LGA)	9°F
3. Niagara Falls, NY	-5°F		
4. Bradford, PA	-12°F		
5. Dubois, PA	-5°F		
6. Erie, PA	1°F		

Number of Days per Year <= 20°F²
(1994-2024 average)

Our Service Territory		Downstate NY	
1. Buffalo, NY	48 days	7. NYC (JFK)	16 days
2. Jamestown, NY	61 days	8. NYC (LGA)	13 days
3. Niagara Falls, NY	56 days		
4. Bradford, PA	66 days		
5. Dubois, PA	54 days		
6. Erie, PA	38 days		

5-Year Average Interruption Duration³
(Total Duration of Outages Over Total Number Customers Served)



Natural Gas
<1 minute



Electric
>19 hours



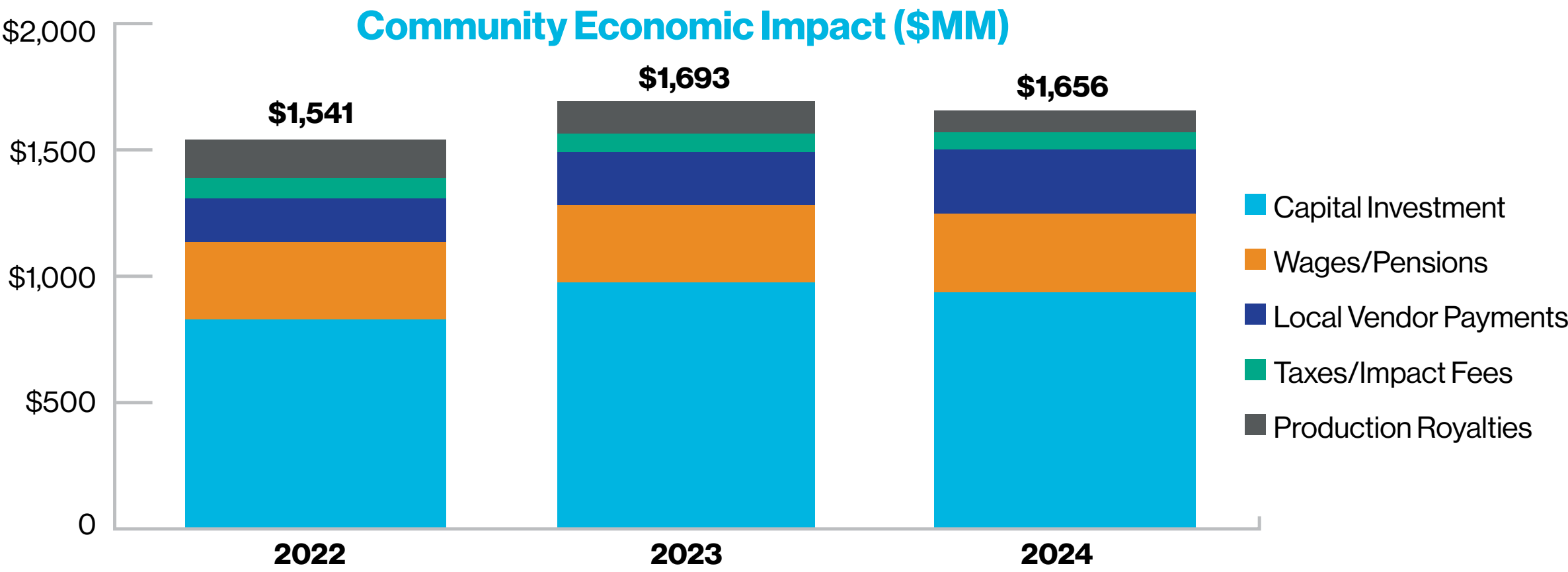
1 National Oceanic and Atmospheric Administration (NOAA).
2 NOAA.
3 Electric data compiled from EIA report 861 based on providers within NFG's service territory (NiMO and NYSEG in NY and PECO in PA).

Giving Back to Our Communities

National Fuel is dedicated to supporting the communities where we operate. We ensure our Foundation’s giving and community involvement are both rooted in our core values. We support and expand initiatives that allow our employees to participate in community programs and volunteer locally with their coworkers, thereby strengthening their relationships with our stakeholders.

Fueling Regional Growth

We contribute to the regional economy through employee wages, payments to local vendors, taxes, royalties, and capital investments. This spending highlights our role as an active participant in regional economic development, supporting our operations while sustaining jobs, strengthening local businesses, and contributing to public services. This approach demonstrates how our guiding principle of Community is embedded in our operations, ensuring that our economic activity benefits not only our business, but also enhances the well-being of the communities we belong to.



**Focus on
Local Job Creation**

**Training with Local
Communities
Focused on Safety**

**Corporate
Foundation**

**Employee
Charitable Giving
Program**




**Community
Volunteer Programs**

**Days of Doing
Community
Service Event**

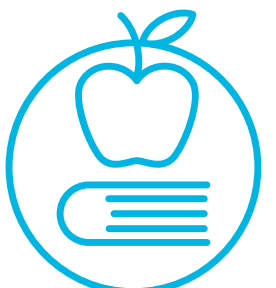
Corporate Philanthropy

In 2024, our Company Foundation and our employees donated more than \$1.7 million to support the communities where we live and work. The Foundation is a 501(c)(3) private foundation funded entirely by shareholders. Our areas of giving are focused on the Foundation’s pillars.



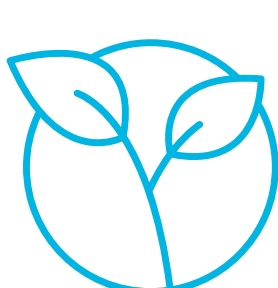
Community Enrichment & Safety

Improve community safety, foster inclusion, promote diversity, and enrich the overall quality of life in our communities.




Education

Advance STEAM (Science, Technology, Engineering, Arts and Mathematics) education and prepare students to compete in the workforce.



Environmental Stewardship

Support the preservation of natural resources, environmental education, watershed protection, emissions reduction and environmental enhancements.



Veteran Services

Fund support services that directly benefit veterans, active service members, and their families.

Seneca Charitable Giving Program

Seneca directs donations to programs that align with Seneca’s core values to help build healthy and safe communities, protect and improve the environment, and support equitable and thriving societies.

Charitable Giving Snapshot

Since 2005, we have proudly supported our communities.

- **More than \$26 million in donations** from our Foundation and National Fuel employees
- Nearly **\$2 million** through Seneca and Highland giving programs
- Benefitting **1,000+** organizations



Faces of Fuel assembled safety kits for Project Safe & Warm.

Project Safe & Warm

National Fuel and Oishei Children’s Hospital launched Project Safe & Warm in the fall of 2024. This initiative, funded by a grant from the National Fuel Gas Company Foundation, aims to support families in need across Western New York during the harsh winter months through education and distribution of essential winter safety kits.

The hospital’s Injury Prevention Outreach Program has distributed nearly 1,200 safety kits containing carbon monoxide detectors, safety magnets, winter hats, and other essentials. These resources were delivered to 20 zip codes across six counties within our Utility’s service area.

Our People, Our Impact



Our Company’s **Faces of Fuel** and **Seneca Serves** programs offer volunteer opportunities for employees to give back to the communities where they live and where the Company operates. Through these programs, employees donate their time and raise funds for local non-profits and charitable organizations.

Fuelin' Good

Employee Charitable Giving Program

The Foundation’s Employee Charitable Giving Program aligns a significant portion of National Fuel’s charitable support with the preferences and generosity of its employees. The program matches employee donations to their selected nonprofits, dollar for dollar, up to \$1,000.

National Fuel also supports a variety of community fundraisers and takes part in numerous community events, professional associations, chambers of commerce, and business development groups.

Employee Giving Snapshot

47%
employee participation

\$12.5
million contributed
since program inception
in 2005

In 2024, donated more than **4,000 hours** by participating in **110+ volunteer events**.

Days of Doing

In 2022, National Fuel introduced Days of Doing, a three-day community service initiative that expands on the Company’s Faces of Fuel and Seneca Serves volunteer programs. This event provides employees the opportunity to give back during work hours by partnering with numerous nonprofits. For our fourth annual Days of Doing, employees engaged in projects reflecting the Company’s commitment to Environmental Stewardship and Community. Their efforts focused on spring clean-up, beautification and building projects. To further support these initiatives, the Company’s Foundation awarded grants to participating nonprofits, reinforcing the impact of employee volunteerism.

Learn more about Days of Doing:
<https://vimeo.com/987211875?share=copy>



2,300+
Total Hours Volunteered

700+
Employees Participated

\$60,000
Grant Donations

Empowering the Future Through Education

In addition to prioritizing education in our Foundation’s philanthropic efforts, we also demonstrate this priority by educating the public about the production, transportation, and distribution of natural gas and by engaging the next generation of scientists, engineers, and professionals through hands-on, real-world experiences.

Penn State Behrend STEAM Fair

National Fuel introduced a hands-on Pipeline Challenge at the STEAM Fair hosted at the Penn State Behrend campus. This free event, open to all ages, was organized by the Youth Education Office at Penn State Behrend. The STEAM Fair provides a dynamic space for learning and exploration drawing hundreds of attendees each year.

Our “Pipeline Challenge” gave learners a glimpse into the world of engineering, demonstrating how professionals plan pipeline routes to efficiently deliver natural gas to customers. It tasked participants with constructing the most cost-effective pipeline from start to finish, navigating a grid of colored dots that each represented different installation challenges. With its blend of problem-solving and creativity, this activity offered an interactive introduction to engineering concepts in an engaging and rewarding way.



Seneca’s Energy Explorers

Seneca Resources and NFG Midstream sponsored the 4-H Northwinds Camp in Eldred, PA, which taught campers about the benefits of natural gas through a s’mores-making demonstration. The campers also learned about the role of pollinators in our ecosystem and how natural gas companies contribute to protecting and promoting pollinator habitats. Each camper received their own s’mores kit and created a native seed mix packet to plant at home.

Through activities like the Northwinds Camp, our Energy Explorers program seeks to enrich students’ comprehension of the natural gas value chain while inspiring future generations of scientists and engineers. The program is led by our employees, including geologists, geophysicists, engineers, and environmental specialists.



Cautionary Note on Corporate Responsibility Data and Forward-Looking Statements

All information included in this Corporate Responsibility Report (“Report”) is being provided on a voluntary basis and, as such, the Company has customized certain sustainability standards and frameworks to our specific circumstances. The decision to include data for historical and future years is at the discretion of the Company and its subsidiaries, and the specific years used as a historical baseline were chosen as appropriate for each reporting segment. The data included in this Report does not constitute financial data calculated in accordance with U.S. generally accepted accounting principles (“GAAP”). This Report also contains “forward-looking statements” as defined by the Private Securities Litigation Reform Act of 1995. Forward-looking statements include statements concerning plans, objectives, goals, projections, strategies, future events or performance, and underlying assumptions and other statements, other than statements of historical facts, as well as statements that are identified by the use of the words “anticipates,” “estimates,” “expects,” “forecasts,” “intends,” “plans,” “predicts,” “projects,” “believes,” “seeks,” “will,” “may” and similar expressions. This Report and the statements contained herein are submitted for the general information of Company stakeholders and are not intended to induce any sale or purchase of securities or to be used in connection therewith. While the Company’s expectations, beliefs and projections are expressed in good faith and are believed to have a reasonable basis, actual results may differ materially from those projected in forward-looking statements. Furthermore, each forward-looking statement speaks only as of the date on which it is made. In addition to other factors, the following are important factors that could cause actual results to differ materially from those discussed in the forward-looking statements: (1) the Company’s ability to estimate accurately the time and resources necessary to meet applicable testing standards, reporting frameworks, and emissions targets, as well as the cost and availability of capital required for such projects; (2) evolving standards and frameworks, including those related to tracking and reporting GHG and methane emissions; (3) changes in the Company’s business, including acquisitions or other expansions of the Company’s property, plant and equipment; (4) disallowance by applicable regulatory bodies of appropriate rate recovery for system modernization; (5) the development and performance of new technology and products, services, and programs, particularly those related to energy efficiency and emission reductions; (6) governmental initiatives or market pressures to reduce or eliminate reliance on natural gas, and the viability of energy-transition related opportunities, including adaptation of the Company’s existing assets; and (7) the other risks and uncertainties described in (i) the Company’s most recent Annual Report on Form 10-K at Item 7, MD&A, and Quarterly Reports on Form 10-Q at Item 2, MD&A, in each case under the heading “Safe Harbor for Forward-Looking Statements,” and (ii) the “Risk Factors” included in the Company’s most recent Annual Report on Form 10-K at Item 1A, as updated by the Company’s Forms 10-Q for subsequent quarters at Item 1A. Forward-looking and other statements in this Report regarding our plans and goals are not an indication that these statements are material to investors or are required to be disclosed in our filings with the Securities and Exchange Commission. The Company disclaims any obligation to update any forward-looking statements to reflect events or circumstances after the date hereof. Because of these risks and uncertainties, readers should not place undue reliance on these forward-looking statements or use them for anything other than their intended purpose. This Report contains references to National Fuel’s website and other reporting documents. National Fuel is not incorporating this Report by reference into any other document and is not incorporating any other document posted on the website into this Report. Except where specified, this Report and the data presented have not been externally audited, assured, attested or verified. The Company makes no warranty, express or implied, regarding the accuracy, adequacy, completeness, legality, reliability or usefulness of this Report.

Appendix A: Task Force on Climate-Related Financial Disclosures (TCFD)

TCFD Pillar	Metric	Report Section
Governance	Describe the board's oversight of climate-related risks and opportunities.	Governance of Corporate Responsibility, Sustainability, and Climate Risk
	Describe management's role in assessing and managing climate-related risks and opportunities.	Governance of Corporate Responsibility, Sustainability, and Climate Risk; Risk Oversight and Risk Management
Strategy	Describe the climate-related risks and opportunities the organization has identified over the short, medium, and long term.	Management of Climate-Related Risk and Climate Strategy; Identification and Evaluation of Climate-Related Opportunities
	Describe the impact of climate-related risks and opportunities on the organization's businesses, strategy, and financial planning.	Management of Climate-Related Risk and Climate Strategy; Identification and Evaluation of Climate-Related Opportunities
	Describe the resilience of the organization's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.	Evaluating our Resilience to Climate Risk
Risk Management	Describe the organization's processes for identifying and assessing climate-related risks.	Risk Oversight and Risk Management; Management of Climate-Related Risk and Climate Strategy
	Describe the organization's processes for managing climate-related risks.	Risk Oversight and Risk Management; Management of Climate-Related Risk and Climate Strategy
	Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organization's overall risk management	Risk Oversight and Risk Management; Management of Climate-Related Risk and Climate Strategy
Metrics and Target	Disclose the metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management process.	Climate-Related Metrics and Targets
	Disclose Scope 1, Scope 2 and, if appropriate, Scope 3 greenhouse gas emissions and the related risks.	Risk Oversight and Risk Management; Greenhouse Gas Emissions
	Describe the targets used by the organization to manage climate-related risks and opportunities and performance against targets.	Climate-Related Metrics and Targets; Greenhouse Gas Emissions

Appendix B: SASB Standards by Segment

Downstream Segment – Gas Utilities & Distributors

Topic	Code	Metric	2022	2023	2024
Energy Affordability	IF-GU-240a.1	Average Retail Gas Rate for:			
		Bundled Retail Sales			
		(1) Residential	\$11.31	\$10.70	\$9.37
		(2) Commercial	\$10.45	\$9.73	\$7.89
		(3) Industrial	\$9.50	\$9.26	\$7.17
		Transportation Sales			
		(1) Residential	\$3.88	\$4.16	\$4.77
		(2) Commercial	\$2.25	\$2.31	\$2.56
		(3) Industrial	\$0.84	\$0.88	\$0.90
	IF-GU-240a.3	Number of Residential Customer Gas Disconnections for Non-Payment:			
		New York Division	14,959	24,898	25,321
		Pennsylvania Division	6,861	6,981	6,635
		Percentage Reconnected within 30 days:			
		New York Division	58%	65%	66%
		Pennsylvania Division	50%	51%	57%
	IF-GU-240a.4	Discussion of impact of external factors on customer affordability of gas, including the economic conditions of the service territory.	See Energy Affordability - Challenges for Our Customers		
End-Use Efficiency	IF-GU-420a.2	Customer gas savings from efficiency measures by market.	See Energy Affordability - Promoting Efficiency to Reduce Gas Bills		

Downstream Segment – Gas Utilities & Distributors (continued)

Topic	Code	Metric	2022	2023	2024
Integrity of Gas Delivery Infrastructure	IF-GU-540a.1	Number of:			
		Reportable Gas Distribution Pipeline Incidents	0	0	0
		Corrective Actions Received	0	0	0
		Violations of Pipeline Safety Statutes	0	0	0
	IF-GU-540a.2	Percentage of Distribution Pipeline Inventory that is:			
		Cast Iron	0.03%	0.00%	0.00%
		Wrought Iron	1.20%	1.20%	1.10%
		Unprotected Base Steel	10.10%	9.40%	8.50%
	IF-GU-540a.3	Percentage of Downstream Segment Transmission Pipelines Inspected:			
		Transmission Pipelines (kilometers)	109	106	105
		Pipelines Inspected (kilometers)	2.91	12.60	0.58
		% of Pipeline Inspected	2.70%	11.90%	0.50%
		% HCA Pipeline Inspected	32.70%	27.90%	5.46% ¹
	IF-GU-540a.4	Description of efforts to manage the integrity of gas delivery infrastructure, including risks related to safety and emissions.	See Safety - System Integrity and Safety		

Downstream Segment – Gas Utilities & Distributors (continued)

Topic	Code	Metric	2022	2023	2024
Activity Metrics	IF-GU-000.A	Number of Customers Served:			
		Residential	702,115	701,730	703,035
		Commerical	51,399	51,374	51,696
		Industrial	1,037	1,038	1,038
		Total	754,551	754,142	755,769
	IF-GU-000.B	Amount of Natural Gas Delivered (MMcf:)			
		Bundled Retail Sales			
		Residential	66,668	59,231	57,251
		Commercial	10,073	9,147	9,108
		Industrial	568	535	505
		Total Retail	77,309	68,913	66,864
		Transportation Sales			
		Residential	6,230	5,061	4,733
		Commercial	25,502	23,313	22,229
		Industrial	34,978	33,830	34,749
		Total Transportation	66,711	62,204	61,711
	IF-GU-000.C	Total Utility Pipeline Length (kilometers):			
		Distribution Mains	23,572	23,581	23,636
		Distribution Services	12,399	12,427	12,455
		Transmission Pipelines	109	106	105
		Regulated Type B Gathering Pipelines	77	76	76
		Regulated Type R Gathering Pipelines	118	118	117
		Total Utility Pipelines	36,276	36,308	36,389

Midstream Segment – Oil and Gas: Midstream

Topic	Code	Metric	2022	2023	2024
Greenhouse Gas Emissions	EM-MD-110a.1	Gross global Scope 1 emissions, percentage methane, percentage covered under emissions-limiting regulations.	See Consolidated Data Tables		
	EM-MD-110a.2	Discussion of long-term and short-term strategy or plan to manage Scope 1 emissions, emissions reduction targets, and an analysis of performance against those targets.	See Governance - Climate-Related Metrics and Targets ; Environmental - Greenhouse Gas Emissions		
Air Quality	EM-MD-120a.1	Air emissions of the following pollutants: (1) NO _x (excluding N ₂ O), (2) So _x , (3) volatile organic compounds (VOCs), and (4) particulate matter (PM ₁₀)	See Consolidated Data Tables		
Ecological Impacts	EM-MD-160a.1	Description of environmental management policies and practices for active operations.	See Environmental - Ecological Impacts and Biodiversity Protection		
	EM-MD-160a.2	Percentage of land owned, leased, or operated within areas of protected conservation status or endangered species habitat.	2%	2%	2%
	EM-MD-160a.3	Acreage Disturbed and Restored:			
		Acres Not Permanently Restored from Prior Years	184	38	80
		Acres Disturbed in Current Year	804	429	160
		Total Acres Impacted	989	467	240
		Acres Permanently Resored in Current Year	436	392	230
		Percentage of Impacted Area Permanently Restored in Current Year	44%	84%	96%
	EM-MD-160a.4	Number and Volume of Hydrocarbon Spills:			
		Number of Spills Greater than 1 Bbl	0	2	0
		Total Volume of Spills Reported (Bbl)	0	8	0
		Total Volume of SpillsRecovered (Bbl)	0	8	0
		Total Volume of Spills Occurring in the Arctic	N/A	N/A	N/A
		Total Volume of Spills Impacting Unusually Sensitive Resources (Bbl)	0	0	0
Competitive Behavior	EM-MD-520a.1	Total amount of monetary losses as a result of legal proceedings associated with federal pipeline and storage regulations related to competitive behavior	0	0	0

Midstream Segment – Oil and Gas: Midstream (continued)

Topic	Code	Metric	2022	2023	2024
Operational Safety, Emergency Preparedness & Response	EM-MD-540a.1	Incident and Compliance Summary			
		Reportable Onshore Gas Transmission Pipeline Incidents	2	0	0
		% Significant Onshore Gas Transmission Pipeline Incidents	50%	0	0
		Corrective Action Order Cases Initiated	0	0	0
		Notices of Probable Violation Cases Initiated	0	0	0
	EM-MD-540a.2	Percentage of Pipelines Inspected			
		Transmission Pipelines (kilometers)	3,094	3,063	3,168
		Pipelines Inspected (kilometers)	364	162	172
		Percentage of Pipelines Inspected	11.80%	5.28%	5.43%
	EM-MD-540a.3	Number of (1) accident releases and (2) non-accident releases from rail transportation	N/A	N/A	N/A
	EM-MD-540a.4	Discussion of management systems used to integrate a culture of safety and emergency preparedness throughout the value chain and throughout project lifecycles.	See Safety		
Environment – Environmental Impacts of Project Development	IF-EN-160a.2	Discussion of processes to assess and manage environmental risks associated with project design, siting, and construction	See Environmental - Ecological Impacts and Biodiversity Protection		
Activity Metric	EM-MD-000.A	Natural Gas Throughput (MMcf)	1,201,925	1,211,459	1,207,229
		Regulated Pipelines (kilometers)	3,673	3,673	3,696
		Total Pipelines (kilometers)	4,458	4,460	4,489
		Compression Horsepower	382,397	385,939	385,849

Upstream Segment – Oil & Gas: Exploration & Production

Topic	Code	Metric	2022	2023	2024
Greenhouse Gas Emissions	EM-EP-110a.1	Gross global Scope 1 emissions, percentage methane, percentage covered under emissions-limiting regulations	See Consolidated Data Tables		
	EM-EP-110a.2	Scope 1 Greenhouse Gas Emissions by Source Category (Metric Tons CO ₂ e):			
		Combustion Sources	112,222	104,442	119,351
		Vented Emissions	126,783	96,543	78,322
		Process Emissions	2,276	1,928	1,737
		Fugitive Emissions	2,977	1,813	1,675
		Flared Hydrocarbons	761	393	2,211
	EM-EP-110a.3	Discussion of long- and short-term strategy or plan to manage Scope 1 emissions, emissions reduction targets, and an analysis of performance against those targets	See Governance - Climate-Related Metrics and Targets; Environmental - Greenhouse Gas Emissions		
Air Quality	EM-EP-120a.1	Air emissions of the following pollutants: (1) Nox (excluding N ₂ O), (2) SO _x , (3) volatile organic compounds (VOCs), and (4) particulate matter (PM ₁₀)	See Consolidated Data Tables		
Water Management	EM-EP-140a.1	(1) Total water withdrawn, (2) total water consumed, percentage of each in regions with High or Extremely High Baseline Water Stress	See Consolidated Data Tables		
	EM-EP-140a.2	Volume of produced water and flow back generated; percentage (1) discharged, (2) injected, (3) recycled; hydrocarbon content in discharged water	See Consolidated Data Tables		
	EM-EP-140a.3	Percentage of hydraulically fractured wells for which there is a public disclosure of all fracturing fluid chemicals used	100%	100%	100%
	EM-EP-140a.4	Percentage of hydraulic fracturing sites where ground or surface water quality deteriorated compared to a baseline	See Environmental - Water Management and Integrity		

Upstream Segment – Oil & Gas: Exploration & Production (continued)

Topic	Code	Metric	2022	2023	2024
Biodiversity Impacts	EM-EP-160a.1	Description of environmental management policies and practices for active sites.	See Environmental - Ecological Impacts and Biodiversity Protection		
	EM-EP-160a.2	Number of Hydrocarbon Spills > 1 Bbl	0	0	0
		Total Volume of Hydrocarbon Spills (Bbls)	0	0	0
		Total Volume of Hydrocarbon Spills Impacting Environmentally Sensitive Shoreline	0	0	0
		Total Volume of Hydrocarbon Spills Recovered (Bbls)	0	0	0
		Number of Non-Hydrocarbon Spills > 1 Bbl	1	3	2
		Total Volume of Non-Hydrocarbon Spills (Bbls)	300	1,502	18
		Total Volume of Non-Hydrocarbon Spills Recovered (Bbls)	Unable to estimate	Unable to estimate	18
		Total Volume of Spills Occurring in the Arctic	N/A	N/A	N/A
	EM-EP-160a.3	Total Reserves Near Sites with Protected Conservation Status or Endangered Species Habitat			
		Total Reserves (Bcfe at fiscal year-end)	4,172	4,536	4,753
		Reserves within Sites with Protected Conservation Status (Bcfe)	17	16	15
		% of Reserves within Protected Conservation	<1%	<1%	<1%
		Reserves within Areas in which Endangered Species Habitat Identified (Bcfe)	170	333	532
		% of Reserves within Areas of Endangered Species	4%	7%	11%
Security, Human Rights & Rights of Indigenous Peoples	EM-EP-210a.1	Percentage (1) proved and (2) probable reserves in or near areas of conflict	Seneca does not currently explore for or develop any natural gas reserves located within Indigenous lands or areas of conflict		
	EM-EP-210a.2	Percentage of (1) proved and (2) probable reserves in or near indigenous land			
	EM-EP-210a.3	Discussion of engagement processes and due diligence practices with respect to human rights, indigenous rights, and operation in areas of conflict	See Environmental - Project Planning and Development		
Community Relations	EM-EP-210b.1	Discussion of processes to manage risks and opportunities associated with community rights and interests	See Governance - Risk Oversight and Management ; Environmental - Project Planning and Development		
	EM-EP-210b.2	(1) Number and (2) duration of non-technical delays	Seneca builds additional lead time into its projects to account for anticipated delays, including changing legislation and regulations to permitting and construction project processes		

Upstream Segment – Oil & Gas: Exploration & Production (continued)

Topic	Code	Metric	2022	2023	2024
Workforce Health & Safety	EM-EP-320a.1	Total Recordable Incident Rate (TRIR) – Full-Time Employees	0.48	0.00	0.00
		TRIR – Contract Employees	0.51	0.87	0.95
		Fatality Rate – Full-Time Employees	0.00	0.00	0.00
		Fatality Rate – Contract Employees	0.00	0.00	0.00
		Near Miss Frequency Rate – Full-time and Contract Employees	2.03	10.71	9.16
		Average Hours of Health, Safety & Emergency Response Training (Employees)	10.52	15.38	13.05
		Total Safety Training Hours for Contractors	4,316	5,422	4,708
		OSHA Days Away, Restricted or Transferred Rate (DART): Upstream Employees	0.00	0.00	0.00
		OSHA Days Away, Restricted or Transferred Rate (DART): Upstream Contractors	0.26	0.35	0.57
	EM-EP-320a.2	Discussion of management systems used to integrate a culture of safety throughout the exploration and production lifecycle	See Safety		
Reserves Valuation & Capital Expenditures	EM-EP-420a.1	Sensitivity of hydrocarbon reserve levels to future price projection scenarios	See Governance - Sensitivity of Reserve Levels to Scenarios that Account for a Price on Carbon Emissions		
	EM-EP-420a.3	Amount invested in renewable energy, revenue from renewable energy sales	N/A	N/A	N/A
	EM-EP-420a.4	Discussion of how price and demand for hydrocarbons or climate regulation influence the capital expenditure strategy for exploration, acquisition, and development of assets	See Governance - Management of Climate-Related Risks and Climate Strategy		
Business Ethics & Transparency	EM-EP-510a.1	% of reserves in countries with lowest Transparency International rankings	0%	0%	0%
	EM-EP-510a.2	Description of the management system for prevention of corruption and bribery throughout the value chain	See Leadership and Governance - Business Ethics		
Management of the Legal & Regulatory Environment	EM-EP-530a.1	Discussion of corporate positions related to government regulations or policy proposals that address environmental and social factors affecting the industry	See Governance - Management of Climate-Related Risk and Climate Strategy ; Environmental - Managing the Evolving Regulatory Environment		
Critical Incident Risk Management	EM-EP-540a.1	Process Safety Event (PSE) Rate – Tier 1	0	0	0
	EM-EP-540a.2	Description of management systems used to identify and mitigate catastrophic and tail-end risks	See Governance - Risk Oversight and Management ; Safety		
Activity Metrics	EM-EP-000.A	Net Gas Production (MMcf/day)	961.33	1,047.82	1,062.86
		Net Oil Production (MBbl/day)	0.07	0.08	0.08
	EM-EP-000.B	Number of Offshore Sites	0	0	0
	EM-EP-000.C	Number of Terrestrial Sites	973	1,027	1,060

Appendix C: Workforce Demographic Data

This information is presented in the Report with more detail. Total chart values may not equal 100 due to conventional rounding.

Gender Diversity		2022		2023		2024	
EEO-1 Job Categories		Female	Male	Female	Male	Female	Male
Administrative Support Workers		81.17%	18.83%	79.81%	20.19%	78.44%	21.56%
Craft Workers		4.22%	95.78%	3.07%	96.93%	3.07%	96.93%
Executive/Senior Level Officials		22.00%	78.00%	23.43%	76.57%	25.56%	74.44%
First/Mid-Level Officials		19.64%	80.36%	20.10%	79.90%	20.33%	79.67%
Laborers and Helpers		6.67%	93.33%	10.34%	89.66%	7.87%	92.13%
Operatives		2.66%	97.34%	3.07%	96.93%	3.13%	96.88%
Professionals		31.98%	68.02%	30.91%	69.09%	31.52%	68.48%
Technicians		15.56%	84.44%	10.42%	89.58%	4.44%	95.56%

Percentage of Racially/Ethnically Diverse Hires		
2022	2023	2024
13.49%	13.64%	18.18%

Percentage of Gender Diverse Hires		
2022	2023	2024
33.33%	27.60%	30.30%

Average Years of Service	
Race/Ethnicity	Years
Asian	5.87
Black/African American	10.14
Hispanic/Latino	6.96
Other ¹	5.62
White	9.68

Average Years of Service	
Female	Male
10.13	9.34

Racial and Ethnic Diversity ¹		2022					2023					2024				
EEO-1 Job Categories		Asian	Black/ African American	Hispanic/ Latino	Other ¹	White	Asian	Black/ African American	Hispanic/ Latino	Other ¹	White	Asian	Black/ African American	Hispanic/ Latino	Other ¹	White
Administrative Support Workers		0.98%	13.69%	4.16%	0.49%	80.68%	0.47%	13.62%	3.76%	0.70%	81.46%	0.44%	13.78%	4.44%	1.56%	79.78%
Craft Workers		0.00%	3.61%	1.21%	1.81%	93.37%	0.00%	3.07%	1.23%	1.84%	93.87%	0.00%	2.45%	1.23%	1.84%	94.48%
Executive/Senior Level Officials		0.00%	2.00%	0.67%	0.00%	97.33%	0.57%	2.86%	1.14%	0.00%	95.43%	0.56%	2.78%	2.22%	0.00%	94.44%
First/Mid-Level Officials		1.02%	2.30%	1.53%	0.25%	94.90%	0.96%	2.39%	1.67%	0.48%	94.50%	0.71%	2.60%	1.65%	0.71%	94.33%
Laborers and Helpers		0.00%	7.78%	0.00%	1.11%	91.11%	0.00%	9.20%	4.60%	1.15%	85.06%	1.12%	13.48%	2.25%	4.49%	78.65%
Operatives		0.17%	1.42%	1.42%	0.89%	96.10%	0.34%	1.70%	1.53%	1.02%	95.40%	0.33%	1.48%	1.81%	0.99%	95.39%
Professionals		2.44%	2.44%	2.71%	1.08%	91.33%	3.38%	2.86%	2.60%	1.56%	89.61%	3.10%	3.10%	2.07%	1.81%	89.92%
Technicians		0.00%	2.22%	0.00%	0.00%	97.78%	0.00%	2.08%	0.00%	0.00%	97.92%	0.00%	2.22%	0.00%	0.00%	97.78%

Appendix D: Workforce Safety Data

Total Number of Hours Worked¹

		2022	2023	2024
Downstream	Employee	2,594,437	2,679,162	2,802,904
Midstream	Employee	873,588	916,122	939,606
Upstream	Employee	418,570	471,124	474,986
	Contractor	2,342,279	2,310,432	2,102,491

OSHA Total Recordable Incident Rate (TRIR)²

		2022	2023	2024
Downstream	Employee	3.93	3.28	3.35
Midstream	Employee	1.37	1.31	3.41
Upstream	Employee	0.48	0.00	0.00
	Contractor	0.51	0.87	0.95

OSHA Days Away, Restricted, or Transferred Rate (DART)²

		2022	2023	2024
Downstream	Employee	2.78	2.39	2.07
Midstream	Employee	1.14	0.87	1.49
Upstream	Employee	0.00	0.00	0.00
	Contractor	0.26	0.35	0.57

Fatality Rate

		2022	2023	2024
Downstream	Employee	0.00	0.00	0.00
	Contractor	0.00	0.00	0.00
Midstream	Employee	0.00	0.00	0.00
	Contractor	0.00	0.00	0.00
Upstream	Employee	0.00	0.00	0.00
	Contractor	0.00	0.00	0.00

Near Miss Frequency Rate (NMFR)³

		2022	2023	2024
Downstream	Employee	N/A	0.90	2.07
Midstream	Employee	N/A	3.51	5.53
Upstream	Employee & Contractor	2.03	10.71	9.16

¹ Total numbers of hours worked by Segment derive values for TRIR, DART, Fatality Rate and NMFR.

² All values restated to CY.

³ Due to timing of safety management system implementation, Downstream and Midstream Segments do not have available 2022 data, and 2023 data reflects only final quarter of that calendar year.

Appendix E: Consolidated Data Tables

This appendix provides a consolidated view of our corporate responsibility metrics for calendar years 2022, 2023, and 2024. Our disclosure primarily uses the standards of the Sustainability Accounting Standards Board (SASB) standards, but it also encompasses sustainability data considered under the Task Force on Climate-Related Financial Disclosures (TCFD) reporting. This information is presented in our Report with more detail. Listed values may not sum to total due to conventional rounding.

Downstream Segment

Scope 1 Greenhouse Gas Emissions (Metric Tons CO ₂ e)	2022	2023	2024
Utility (NY & PA)			
EPA Mandatory Reporting	244,982	232,258	217,491
Additional EPA Facilities	1,571	973	941
Other Sources	95,931	94,416	95,080
Total Utility	342,484	327,647	313,512
Scope 1 Methane (CH ₄) Emissions (Metric Tons as CO ₂ e)	2022	2023	2024
Utility (NY & PA)			
EPA Mandatory Reporting	244,684	231,961	217,222
Additional EPA Facilities	1,568	973	941
Other Sources	84,465	85,610	86,172
Total Utility	330,717	318,544	304,335
Scope 2 Emissions (Metric Tons CO ₂ e)	2022	2023	2024
Utility (NY & PA)	986	949	992
Scopes 1 & 2 Emissions Intensity (kg CO ₂ e/BOE)	2022	2023	2024
Utility (NY & PA)			
Methane Emissions Intensity	13.3	13.1	12.34
Greenhouse Gas Emissions Intensity	13.7	13.6	12.75

Downstream and Midstream Segments Waste Summary	2022	2023	2024
Solid Waste (MT) – Hazardous			
Incineration	4.63	6.13	7.20
Landfill	2.61	0.24	0.06
Reuse/Recovery	0.32	—	0.27
Recycled	0.80	1.34	1.05
Total Hazardous	8.36	7.71	8.58
Solid Waste (MT) – Non-Hazardous			
Incineration	18.16	6.02	6.35
Landfill	400.77	1,106.74	2,865.32
Reuse/Recovery	3.76	4.83	0.00
Recycled	1,277.25	3,978.07	955.15
Total Non-Hazardous	1,699.94	5,095.66	3,826.82
Total Solid Waste	1,708.30	5,103.37	3835.40
Liquid Waste (Bbls) – Hazardous			
Incineration	189.00	230.38	173.00
Landfill	5.24	—	—
Reuse/Recovery	31.31	2.62	—
Recycled	1.31	—	—
Total Hazardous	226.86	233.00	173.00
Liquid Waste (Bbls) – Non-Hazardous			
Incineration	1,159.93	950.43	990.61
Injection Well	N/A	N/A	2,960.00
Landfill	17.02	126.12	91.19
Reuse/Recovery	16,464.08	31,096.63	33,333.48
Recycled	870.76	1,141.48	870.24
Water Treatment - Disposal	2,392.55	3,949.71	0.00
Total Non-Hazardous	20,904.34	37,264.36	38,245.52
Total Liquid Waste ¹	21,131.20	37,497.36	38,418.52

1 Total liquid waste does not include produced water.

Midstream Segment

Scope 1 Greenhouse Gas Emissions (Metric Tons CO ₂ e)	2022	2023	2024
Empire			
EPA Mandatory Reporting ¹	107,836	108,540	99,476
Additional EPA Sources	1,501	972	833
Other Sources	7,482	7,482	7,482
Total Empire	116,819	116,994	107,791
Supply Corporation ²			
EPA Mandatory Reporting	277,523	246,145	216,791
Additional EPA Sources ³	178,167	147,407	158,515
Other Sources	14,137	11,856	7,983
Total Supply Corporation	469,827	405,408	383,289
Midstream Company ³			
EPA Mandatory Reporting	532,457	547,731	499,704
Additional EPA Sources	11,837	0	0
Other Sources	709	768	727
Total Midstream Company	545,003	548,499	500,431
Midstream Segment			
EPA Mandatory Reporting	917,816	902,415	815,971
Additional EPA Sources	191,506	148,380	159,348
Other Sources	22,329	20,106	16,192
Total Midstream Segment	1,131,651	1,070,901	991,511

Scope 1 Methane (CH ₄) Emissions (Metric Tons as CO ₂ e)	2022	2023	2024
Empire			
EPA Mandatory Reporting	6,241	5,225	4,605
Additional EPA Sources	1,319	798	587
Other Sources	7,475	7,475	7,475
Total Empire	15,034	13,497	12,666
Supply Corporation			
EPA Mandatory Reporting	119,085	94,454	81,928
Additional EPA Sources	118,375	104,817	109,270
Other Sources	10,780	8,943	5,036
Total Supply Corporation	248,240	208,214	196,235
Midstream Company			
EPA Mandatory Reporting	147,283	137,782	107,117
Additional EPA Sources	1,236	0	0
Other Sources	536	564	563
Total Midstream Company	149,054	138,346	107,680
Midstream Segment			
EPA Mandatory Reporting	272,608	237,461	193,650
Additional EPA Sources	120,929	105,615	109,857
Other Sources	18,790	16,982	13,074
Total Midstream Segment	412,328	360,057	316,581

1 2022 and 2023 values are updated due to discovery of fuel meter failure.
2 2022 and 2023 values are updated to reflect the utilization of portable flaring as a methane reduction method during blowdown venting events.
3 2022 and 2023 values have been updated to accurately reflect equipment inventory and consistency with EPA's Part 98 methodology.

Midstream Segment (continued)

Scope 2 Emissions (Metric Tons CO ₂ e)	2022	2023	2024
Empire	582	564	536
Supply Corporation	4,400	4,067	3,383
Midstream Company	843	770	677
Total Midstream Segment	5,825	5,401	4,596

Scopes 1 & 2 Emissions Intensity (kg CO ₂ e/BOE)	2022	2023	2024
Pipeline & Storage (Supply Corporation and Empire)			
Methane Emissions Intensity	2.04	1.79	1.72
Greenhouse Gas Emissions Intensity	4.58	4.26	4.07
Gathering (Midstream Company)			
Methane Emissions Intensity	2.10	1.77	1.35
Greenhouse Gas Emissions Intensity	7.68	7.03	6.30
Total Midstream Segment			
Methane Emissions Intensity	2.06	1.78	1.57
Greenhouse Gas Emissions Intensity	5.68	5.33	4.95

Air Emissions (Metric Tons CO ₂ e) ¹	2022	2023	2024
Empire			
NO _x	26	28	25
SO _x	4	4	4
VOC	5	6	6
PM	2	2	2
Supply Corporation			
NO _x	420	333	299
SO _x	4	3	3
VOC	258	206	148
PM	14	13	11
Midstream Company ²			
NO _x	348	355	322
SO _x	3	3	3
VOC	116	102	103
PM	15	16	16
Total Midstream Segment			
NO _x	794	716	646
SO _x	10	10	9
VOC	379	321	257
PM	31	31	29

1 2022 and 2023 values have been updated to more accurately reflect company facilities.
2 2022 and 2023 values have been updated to more accurately reflect emissions.

Upstream Segment

Scope 1 Greenhouse Gas Emissions (Metric Tons CO ₂ e)	2022	2023	2024
Seneca			
EPA Mandatory Reporting	227,046	186,710	152,675
Additional EPA Facilities	0	0	0
Other Sources	17,973	18,409	50,621
Total Seneca	245,019	205,119	203,296
Highland Field Services (HFS)			
EPA Mandatory Reporting	0	0	0
Additional EPA Facilities	0	0	0
Other Sources	14,467	11,807	7,637
Total HFS	14,467	11,807	7,637

Scope 1 Methane (CH ₄) Emissions (Metric Tons as CO ₂ e)	2022	2023	2024
Seneca			
EPA Subpart W Mandatory Reporting	130,665	99,034	61,417
Additional EPA Subpart W Facilities	0	0	0
Other Sources	455	396	22,687
Total Seneca	131,120	99,430	84,104
Highland Field Services (HFS)			
EPA Mandatory Reporting	0	0	0
Additional EPA Facilities	0	0	0
Other Sources	14	9	5
Total HFS	14	9	5

Scope 2 Emissions (Metric Tons CO ₂ e)	2022	2023	2024
Seneca	463	546	672
HFS	607	1,151	693

Scopes 1 & 2 Emissions Intensity (kg CO ₂ e/BOE)	2022	2023	2024
Seneca			
Methane Emissions Intensity	1.96	1.39	1.14
Greenhouse Gas Emissions Intensity	3.67	2.87	2.78
NGSI Intensity %			
Seneca			
Methane Emissions Intensity - NGSI	0.063%	0.044%	0.037%

Seneca Production Data	2022	2023	2024
Production (MBOE)	66,937	71,775	73,723

Upstream Segment (continued)

Air Emissions (Metric Tons CO ₂ e)	2022	2023	2024
Seneca			
NO _x	503.58	313.22	310.98
SO _x	0.82	0.72	0.73
VOC	49.04	53.63	53.25
PM ₁₀	16.25	12.23	10.98
HFS			
NO _x	96.98	36.94	18.86
SO _x	9.68	9.17	4.12
VOC	29.05	15.74	12.14
PM ₁₀	5.57	3.05	1.31
All Non-Hazardous Waste ³			
Liquid Waste (Bbls)			
Injection	284	864	2,091
Landfilled	0	0	0
Recycled	1,514	444	3,175
Reuse/Recovery	345,350	362,325	448,309
Total	347,148	363,633	453,575
Solid Waste (Metric Tons)			
Injection	0	0	0
Landfilled	88,280	81,888	69,572
Recycled	42	25	104
Reuse/Recovery	0	27	0
Total	88,322	81,940	69,676

Freshwater Withdrawn and Freshwater Consumed (Thousands of Cubic Meters) ¹	2022	2023	2024
Total Water Withdrawn	1,686	1,564	1,255
% of Water from Locations with High or Extremely High Water Risk	0%	0%	0%
Total Freshwater Consumed	1,696	1,070	1,055
% of Water Consumed from Locations with High or Extremely High Water Risk	0%	0%	0%

Volume of Produced Water and Flowback Generated (Thousands of Cubic Meters) ²	2022	2023	2024
Produced Water and Flowback	1,764	1,811	1,672
% Discharged	0%	0%	0%
% Injected for Disposal	9.7%	8.0%	3.6%
% Recycled	90.3%	92.0%	96.4%

1 Freshwater withdrawn and consumed is tracked and reported to PADEP and Susquehanna River Basin Commission.
2 Produced, injected, and recycled water volumes are measured and recorded daily as per standard field operating procedures, and are reported to PADEP.
3 Waste management values include data from both Seneca and HFS.

Appendix F:

Independent Third-Party Verification of Emissions Data



VERIFICATION STATEMENTS FOR NATIONAL FUEL UPSTREAM, MIDSTREAM, AND DOWNSTREAM
REPORTING FOR REPORTING YEAR 2022, 2023, AND 2024

National Fuel Gas Company (National Fuel) is a diversified energy company engaged principally in the onshore exploration and production, gathering, transportation, and distribution of natural gas. The Company operates an integrated business, with assets centered in Western New York and Pennsylvania. National Fuel reports their greenhouse gas (GHG) emissions pursuant to the U.S. EPA 40 CFR Part 98 Subpart W reporting requirements. Additionally, National Fuel reports Criteria Pollutant Emissions annually. National Fuel enlisted the services of Tetra Tech, Inc. (Tetra Tech) to perform a review of their reported 2022, 2023, and 2024 reporting year emissions for their Upstream, Midstream, and Downstream reporting segment processes.

The National Fuel assurance review was done by an independent third-party auditor to review submitted emissions, reporting methodology, and process flow to ensure no material misstatement or nonconformances occurred for the 2022, 2023, and 2024 reporting years. The verification body that conducted the GHG assurance review is certified by both the California Air Resources Board (CARB), the Oregon Department of Environmental Quality (DEQ), and State of Washington Department of Ecology (Ecology). While National Fuel is not required to comply with CARB requirements, the methodology contained with the CARB Mandatory Reporting Regulation (MRR) is robust and includes specific requirements for data review and reporting. The approach contained within 40 CFR Part 98 and guidance provided within the CARB MRR were utilized for the assurance review of National Fuel with the approach specifically tailored for National Fuel’s reporting requirements. Tetra Tech’s report presents the results of the assurance review process for the 2022, 2023, and 2024 reporting years.

The verification body has conducted a review of the submitted GHG, Methane, and Criteria Pollutant emissions for both the Pennsylvania and New York facilities for the 2022, 2023, and 2024 reporting years for the Upstream, Midstream, and Downstream reporting segment processes. A review of raw data utilized to calculate these submitted emissions, backup documentation, prepared Monitoring Plans, data management systems, and site interviews with key reporting National Fuel staff was conducted. Additionally, the verification body reviewed National Fuel’s Corporate Responsibility Reports. The reports detailed the Upstream, Midstream, and Downstream processes and discussed all aspects of National Fuel’s impact, from GHG emissions to biodiversity impacts. During the verification process, all questions and issues were reviewed and discussed with National Fuel, and all issues were closed out.

Per the CARB MRR, “material misstatement” means any discrepancy, omission, or misreporting, or aggregation of the three, identified in the course of verification services that leads a verification team to believe that the total reported covered emissions (metric tons of CO₂e) or reported covered product data contains errors greater than 5%, as applicable, in an emissions data report. Additionally, “nonconformance” means the failure to use the methods or emission factors specified in this article to calculate emissions, or the failure to meet any other requirements of the regulation.

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safe
affordable
sustainable
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