



2025 Corporate Responsibility Report



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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
- PANHP** - Pennsylvania Natural Heritage Program
- 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

- AMI** - Appalachian Methane Initiative
- AGA** – American Gas Association
- API** – American Petroleum Institute
- AVO** - Audio, visual, olfactory
- 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
- CISO** - Chief Information Security Officer
- Code** – Company’s Code of Business Conduct
- CQMS** - Construction Quality Management System
- DART** - Days Away, Restricted or Transferred
- DIMP** – Distribution Integrity Management Program
- EEMDL** - Energy Emissions Modeling and Data Lab
- EDM** – Engineering Design Manual
- EHS** - Environmental, health and safety
- EIA** – United States Energy Information Administration
- ERGs** - Employee Resource Groups
- ERM** – Enterprise Risk Management
- ESCAMP** – Erosion and Sedimentation Control and Agricultural Mitigation Procedure
- ESG** – Environmental, social, and governance disclosures
- GAPL** - Gas Assisted Plunger Lift
- GHG** – Greenhouse Gas
- GHGRP** – United States EPA’s Greenhouse Gas Reporting Program
- GRI** – Global Reporting Initiative
- GWP** - Global warming potential
- HAZWOPER** - Hazardous Waste Operations and Emergency Response
- HCA** – High consequence area
- IFC** – International Finance Corporation
- ILI** - In-Line Inspection
- ILO** – International Labor Organization
- InfoSec** – Information security
- IMS** - Integrity Management System
- INGAA** – Interstate Natural Gas Association of America
- IPCC** – Intergovernmental Panel on Climate Change
- LEL** - Lower explosive limit
- LiDAR** – Light Detection and Ranging
- LDAR** – Leak Detection and Repair

- LMI** – Low-Moderate-Income Portfolio
- LTP** - Long-term plan
- MAOP** – Maximum allowable operating pressure
- MSC** – Marcellus Shale Coalition
- MSCI** - Morgan Stanley Capital International
- MMcf** – One million cubic feet
- NGSI** – National Gas Sustainability Initiative
- NMFR** – Near-miss frequency rate
- PACs** - Political Action Committees
- PNDI** - Pennsylvania Natural Diversity Inventory
- PNI** – Pennsylvania Natural Gas Inventory
- PNHP** – Pennsylvania Natural Heritage Program
- PSMS** – Pipeline Safety Management Systems
- PPE** – Personal protective equipment
- OGI** - Optical gas imaging
- OQ** - Operator Qualifications
- ROW** – Right-of-way
- RP** - Recommended Practice
- 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
- VGR** - Vent gas recovery
- VOC** – Volatile organic compound
- WNA** – Weather normalization adjustment
- WEO** – World Energy Outlook

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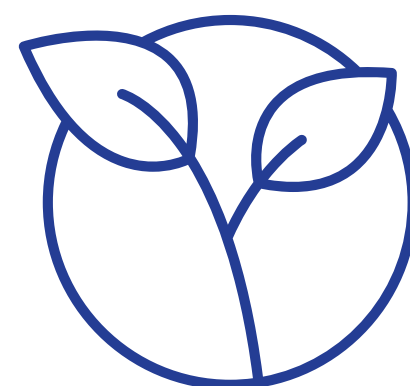
2025 Report Highlights

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, 2025 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)
- GRI-Referenced Standards
 - Governance and Social metrics



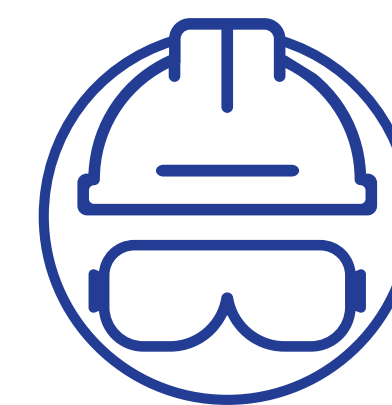
Environmental Stewardship

- 31.5% 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
- Collaborative engagement with state authorities aimed at restoring and enhancing biodiversity



Human Capital Management

- Growing Empower Mentoring Program
- Continued focus on career and leadership development opportunities
- Prioritization of employee safety and wellness



Prioritizing Safety

- Accomplished best-ever DART rate record
- 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
- 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 three business segments: Integrated Upstream and Gathering, Pipeline and Storage, and Utility.¹

¹For financial reporting purposes, National Fuel Gas Midstream Company, LLC and Seneca Resources Company, LLC comprise the Integrated Upstream and Gathering segment.



Downstream

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 756,000 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.



Midstream

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, primarily providing gathering services to Seneca.



Upstream

Seneca Resources Company, LLC (“Seneca”), a Pennsylvania limited liability company, carries out the Company’s Exploration & Production operations.¹ Seneca is engaged in the exploration for, and the development and production of, natural gas in the Appalachian region of Pennsylvania.

Our Core Values

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



Safety

We foster a safety-first culture built on awareness, action and accountability.



Excellence

We work as a team, driving best in-class operations, reliability and continuous improvement to deliver superior results.



Commitment

We fuel lives every day and are proud to make a positive impact where we live and work.



Integrity

We do the right thing, guided by integrity, honesty and respect.

Our Stakeholder Engagement

	Our Customers	Our Vendors	Our Employees	Our Investors	Our Regulators	Our Communities
Topics	• Safety • Affordability and reliability • Environmental stewardship • Special assistance programs	• Financial and operational performance • Safety and training • Compliance and reporting • Anti-corruption • Supplier Code of Conduct Policy • Labor and Human Rights Policy	• 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	• 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	• Compliance, coordination, and cooperation • Safety • Affordability and reliability • Environmental impacts • Project routing and planning • Public policy	• 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	• Safety campaigns • Website and customer portal • Online presence and social media • Locally staffed call center • Press releases • Emails and direct mail	• Competitive bidding process • Website and dedicated business partner page • Direct mail and online posting of policies • Safety meetings • Ethics hotline • Contractor meetings/trainings	• 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	• Earnings calls and presentations • Annual shareholder meetings • Industry/investor conferences • Analyst meetings • News releases • Investor relations websites • Company proxy, reports, and disclosures • Shareholder services	• 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	• 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 and 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 2025 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.](#)

Dear Stakeholders,

Thank you for your interest in National Fuel Gas Company's 2025 Corporate Responsibility Report.

Throughout our nearly 125-year history, National Fuel has remained committed to responsibly and sustainably serving the communities where we live and work. Our Core Values reflect the culture that fuels our Company: Safety, Excellence, Integrity and Commitment.

Whether producing, storing, transporting or distributing natural gas, these values remain front and center for all employees – guiding every action and interaction. Our safety-first culture prioritizes awareness, action and accountability. Our focus on excellence drives best-in-class operations and continuous improvement. Integrity and commitment mean we do the right thing and are proud to make a positive impact.

Investing in Our Shared Energy Future

As the energy landscape evolves, National Fuel's core values will continue to guide our business practices and approach to long-term value creation.

Throughout the Company's service territories, energy demand is growing. From economic development and technological advancement to the increasing amount of infrastructure needed for data centers, natural gas will remain an essential component of the energy mix. Customers deserve safe, reliable, affordable, easily dispatchable energy, and our fully integrated business model uniquely positions National Fuel to support these needs.

What to Look For

This year's report highlights National Fuel initiatives and activities for 2025. You'll find information on our strong corporate governance practices – from our high ethical standards to our careful management of risks and opportunities. You'll see how we're empowering our employees and the community to take ownership over safety, leading to record numbers for year-over-year improvement in safety metrics. We've shared how we're supporting the growth and development of our workforce, while continuing to build a culture focused on safety and inclusivity. We've also highlighted our focus on environmental stewardship – reducing our impact and emissions while conserving and enhancing biodiversity.

I'm proud of these accomplishments and equally proud of our engagement with our stakeholders. We encourage you to use this report to learn more about National Fuel's efforts and look forward to working with you in the years ahead to ensure a safe, reliable, and affordable energy future.

David P. Bauer

David P. Bauer
President and Chief Executive Officer



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Strong Corporate Governance Practices

Our Experienced and Independent Board of Directors

The Board of Directors of National Fuel 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 variety of experiences and perspectives relating primarily, but not exclusively, to the Company's business segments and operating footprints.

Board Governance Highlights

- ✓ 91% independent
- ✓ Designated lead independent director
- ✓ Annual election of all directors
- ✓ Separate roles of chairman of the board and Chief Executive Officer



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. The Board has also directed management to continue engaging as appropriate, with interested shareholders and to inform the Board of requests for meetings with its members.

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.

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



¹The graph reflects the current makeup of the Company's Board of Directors as of September 1, 2026. 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.

Business Ethics

National Fuel seeks 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 administers the Code as it relates to the Company's directors and executive officers. Additionally, the Audit Committee monitors compliance 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

On an annual basis, National Fuel takes various steps to ensure compliance with the Code, reinforcing our core value of integrity:

- **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 publicly available toll-free hotline or dedicated website to anonymously report suspected wrongdoings, possible conflicts of interest, or fraud.

In 2025, 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 annual 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.

Integrity as a Core Value

- Making our Code of Business Conduct and Ethics and anonymous reporting methods publicly available for employees and external stakeholders
- Regularly reinforcing business ethics through annual employee training
- Testing employees' knowledge through hypothetical scenarios and requiring execution of a certification of understanding after each training



Integrity

We do the right thing, guided by integrity, honesty and respect.

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 agreements](#).

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 letter also outlines National Fuel's expectations for employees in dealing with external business partners, namely prohibitions against an employee:

- 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.
- 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 the Company's expectations. This policy addresses the Company's expectations with respect to:

- 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 policymaking process.

National Fuel's [Political Activities Principles](#) further address the Company's political contributions program, the Company's Political Action Committees (PACs) and lobbying activities, membership in organizations, political expenditures, and trade/business association expenditures, including dues allocated to lobbying. Employees that elect to participate in the Company's PACs are provided with an annual report that reflects political expenditures and recipients of funds.

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 we 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' PACs, 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.



We offer our customers the **lowest gas bills** out of all the large gas utilities in New York¹ and Pennsylvania.²



Educating All Employees Regarding the Energy Landscape

Every person in the United States relies on energy, although information about energy sources and policies is not always accessible or digestible. Our Natural Gas Champions program helps to bridge this education gap for our employees and their communities. This program also allows our customer and field operational employees to learn about the energy landscape and provides the necessary tools to accurately respond to questions when directly interfacing with customers.

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.

¹Based on 2024 data available on company websites as required by the NYPSC and 100 Mcf annually.

²Based on analysis of 2025 PAPUC Annual Rate Comparison Report, which includes data for average monthly residential bills for 2025, and 15 Mcf monthly.

Information Security

National Fuel believes that strong information security is critical to success. The Company is committed to continuously evaluating and strengthening its data privacy and cybersecurity posture, ensuring risk mitigation and defense efforts remain robust.

As part of this commitment, National Fuel has aligned its Information Security (InfoSec) Program to the National Institute of Standard and Technology's Cybersecurity framework. Our dedicated InfoSec team meets weekly with key Information Technology and Operation Technology leadership to discuss cybersecurity threats and alerts. They promote security awareness through personnel training, monitor systems for anomalous behavior, investigate potential security events, and assist business partners in providing secure and resilient systems.

Additionally, the Corporate Information Security Steering Committee (CISSC) meets quarterly to discuss emerging information security risks and mitigation/defense efforts. Led by the Company's Chief Information Officer and Chief Information Security Officer (CISO), the CISSC is comprised of InfoSec professionals, leadership from key departments, and senior management. The CISO also provides regular updates to the Board, including quarterly briefings on information security risks assessed as part of the Company's Enterprise Risk Management(ERM) program.

Company Launches New Corporate Command Center

In 2025, National Fuel built a Command Center that converges cybersecurity, physical security, and technology performance into a single coordinated capability, providing real-time visibility, rapid incident response, improved resilience, and enhanced protection of our customers, employees, assets, and systems. The Command Center:

- Serves as a strategic operational asset that aligns safety, reliability, cybersecurity, and operational efficiency objectives across National Fuel.
- Improves enterprise situational awareness through real-time dashboards, analytics, and monitoring of critical systems and facilities.
- Supports business resilience and regulatory compliance by improving readiness, reporting, and organizational response capabilities.

Training & Internal Policies	External Audits	Information Security Safeguards
• All employees and contractors with access to Company systems complete a minimum of one (1) training each year and information security training at least once per year • InfoSec provides additional training to high-value targets • InfoSec regularly reviews and updates information security and device policies regularly across the Company • Employees are provided with comprehensive information security awareness resources including training through simulated phishing emails, cyber-risk announcements, and targeted 'bite-sized' cyber training sessions • Active participation in National Cybersecurity Awareness Month • The Board receives periodic and as-needed updates on cyber threats and trends	• The Company engages a variety of independent cybersecurity vendors to perform regular assessments 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: ◦ 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	• InfoSec performs ongoing comprehensive investigations of National Fuel's 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-Related 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
Areas of Oversight		
- Corporate governance principles - Corporate responsibility and sustainability (standing agenda item at Committee meetings) - Board composition and diversity - Board evaluations	- Compensation philosophy and practices - Executive compensation tied to corporate responsibility and sustainability metrics	- Financial statement integrity - Internal control systems - Audit processes and annual risk-based audit plan - Enterprise Risk Management (ERM) process, including climate-related risks¹ - Code of Business Conduct and Ethics
✓ 100% Independent ²	✓ 100% Independent ²	✓ 100% Independent ²

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, and is made up of the Company's senior executive team.

¹The ERM process is reviewed quarterly during the Audit Committee meetings, which all directors are invited to attend. However, the entire board of directors maintains oversight and responsibility of enterprise risks.
²All members of the Nominating/Corporate Governance, Compensation, and Audit Committees are independent, as independence is defined in NYSE listing standards.

Corporate Responsibility Governance Chain



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).

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



Risk Oversight and Risk Management

The Board maintains close oversight of the assessment and mitigation of risks facing the Company. Through its ERM framework, the Company identifies key “foundational risks” and specific “critical” and “potentially emerging” risks among five major risk categories: Financial, Regulatory, Operational, Strategic, and Safety.

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. In support of this process, 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. 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 do not currently meet the criteria to be classified as critical risks. They may arise from external changes such as technology or economic shifts or from consumer or regulatory changes.

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-related 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.

As a proactive measure, the team tests the plan annually to verify the Company’s readiness to respond to natural disasters or large-scale pipeline or information technology system events. Our Incident Management team conducts the in-depth simulations of, and responses to, a realistic information technology and pipeline system incident. When simulating responses to scenarios, the team addresses 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 identifies opportunities for improvement during the simulations to further strengthen National Fuel’s ability to respond to a major incident.

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 (4) central themes of the TCFD : Governance, Strategy, Risk Management, and Metrics and Targets. 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 potential 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 review of future climate-related physical risks has indicated that there is low financial exposure to the Company.

Management of Regulatory Risks

The Company identifies legislative and regulatory risks that could impact the Company financially. National Fuel’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 a rigorous regulatory regime with respect to environmental and ecological impacts. The Company regularly reviews and evaluates the possible impacts these legislative and regulatory changes and trends may have on our business segments.

Climate-Related Physical Risks

Risk Category	Risk	Potential Impacts
Acute	• More frequent and severe weather events	• Business interruption or system shutdown leading to reduced margins • Increased costs from operational damage • Increased insurance premiums
Chronic	• Long-term shift in climate patterns resulting in new storm patterns or chronic increased temperature	• Increased pricing volatility due to changing weather patterns • Supply chain disruption

Climate-Related Transitional Risks¹

Risk Category	Risk	Potential Impacts
Policy and Legal (Legislation, regulation, and litigation)	• 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	• 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 parice technology
Technology (Improvements or innovations that support decarbonization)	• Decreased natural gas demand due to renewable energy adoption/technology developments	
Markets (Shifts in supply and demand for fossil fuels)	• Shifts in supply and demand for natural gas	
Reputation (Changes in customer and community perceptions and behaviors)	• 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	

¹The Company has identified its primary medium and long-term transitional risks as policy and regulatory changes, project opposition, and a decreased demand for natural gas.

Identification and Evaluation of Climate-Related Opportunities

Natural gas has played a significant role in driving greenhouse gas (GHG) emissions reductions over the past decade. National Fuel believes natural gas will remain an important part of the nation’s long-term energy strategy – particularly gas extracted from the Appalachian Basin, which has a lower carbon intensity than gas from other U.S. basins.

For consumers in cold weather regions like Western New York and Pennsylvania, natural gas is the fuel of choice for its reliability and affordability – meeting the energy needs of residential as well as industrial customers (including power generation).

We also anticipate that natural gas will play a long-term role in 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.



Identified Opportunities Under the Task Force on Climate-Related Financial Disclosures (TCFD) Framework

TCFD Category	Climate-Related Opportunities
Resource Efficiency	• 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	• Leverage alternative energy sources and efficiency initiatives to reduce the Company’s energy usage
Products and Services	• Leverage existing systems to efficiently meet growing energy demand and support sustainable expansion • Leverage our existing infrastructure expertise to develop Renewable Natural Gas (RNG) production facilities • Explore leveraging existing infrastructure to transport alternative low-carbon and no-carbon fuel sources, such as RNG and hydrogen
Markets	• Access to markets seeking responsibly sourced natural gas production
Resilience	• Seek 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.

CCUS Team

Hydrogen Team

Geothermal Team

RNG 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 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 lower costs. Additionally, the execution of business development opportunities would drive increased revenues, earnings, and cash flows.

Evaluating our Resilience to Climate Risk

Physical Risk Analysis

Similar to its review of climate risks, the Company has 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 previously 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
• Flooding • Landslides • Hurricanes • Wildfires	• Extreme heat • Extreme cold • Water stress & drought

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

National Fuel previously conducted 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 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 developed and submitted its Long-Term Plan (LTP) with the NYPSC. 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 key components of the plan demonstrated their constructive view of natural gas and the shared approach 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.

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



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

Seneca Resources, a National Fuel subsidiary, reviewed sensitivities to its reported fiscal 2025 year-end reserves utilizing U.S. natural gas pricing for three different scenarios outlined in the 2025 World Energy Outlook (WEO) Report – the Current Policies, Stated Policies, and Net-Zero Emissions by 2050 scenarios.

The WEO Current Policies Scenario considers a snapshot of policies and regulations that are already in place and offers a cautious perspective on the speed at which new energy technologies are deployed and integrated into the energy system. The WEO Stated Policies Scenario considers the application of a broader range of policies, including those that have been formally put forward but not yet adopted, as well as other official strategy documents that indicate the direction of travel. Barriers to the introduction of new technologies are lower than in the Current Policies Scenario, but the Stated Policies Scenario does not assume that aspirational targets are met. The Net Zero Emissions by 2050 Scenario takes a different approach, describing a pathway to reduce global energy-related carbon dioxide emissions to net zero by 2050, while recognizing each country will have its own route.

Seneca reviewed the impact of natural gas prices included in the WEO Report “Wholesale fossil fuel prices by scenario” table on its fiscal 2025 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 2025 reserves for the three (3) 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 2025 reserves due to low operating costs and SEC pricing that is at or below the WEO pricing scenarios.

Prices by Scenario (source WEO 2025)		Stated Policies		Announced Pledges		Net Zero Emissions by 2050	
Natural Gas (USD/MBtu)	2025	2030	2050	2030	2050	2030	2050
United States	\$2.70	\$3.90	\$4.20	\$3.20	\$2.90	\$2.10	\$2.00



Fiscal year 2025 reported net reserves would remain at approximately 5 TCFE under all three of the WEO Report scenarios.

Climate-Related Metrics and Targets

In connection with National Fuel’s ongoing sustainability efforts, the Company evaluated key metrics and developed targets to measure and monitor its progress in managing GHG and methane emissions. In 2021, National Fuel established segment-level Scope 1 and 2 methane emissions intensity targets, as well as a corporate-level Scope 1 and 2 GHG emissions target, each using a calendar 2020 baseline. Additionally, the Utility set Scope 1 reduction targets for delivery system emissions (based on the 1990 baseline). The Company identified these metrics as the most useful in managing climate-related risks and established corresponding targets to further our emissions reduction strategy.

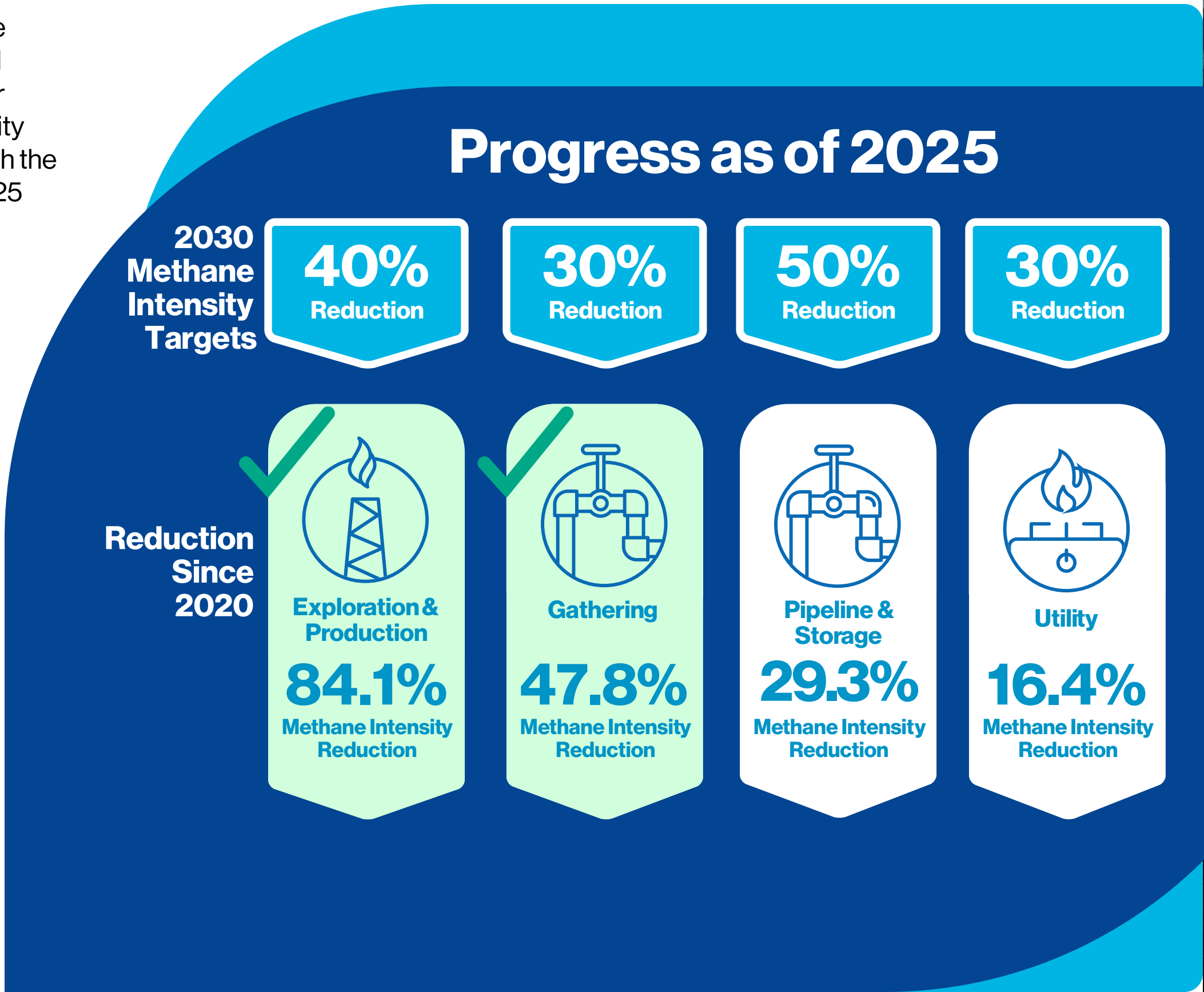
Effective January 1, 2025, the EPA revised Subpart W of the Greenhouse Gas Reporting Program, which includes new emissions sources, revised emissions calculation methodologies, and updated emissions factors for certain sources. As a result, the Company is updating its methane intensity calculations to reflect these changes, which will be incorporated into both the baseline metrics and reported progress beginning with our calendar 2025 disclosures.

In light of these regulatory reporting updates, as well as continued growth across the Company’s operations, the Company has decided to discontinue our consolidated absolute GHG emissions reduction target. As we look ahead, the Company plans to continue reporting our absolute emissions at a consolidated level, and will retain its emphasis on appropriate methane intensity reductions across its business segments and operational emissions reductions within its Utility system.

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. More information pertaining to programs that are driving the Company’s progress to limit emissions can be found in the [Environmental – Greenhouse Gas Emissions disclosure](#).

At the corporate level, the Company has **reduced our consolidated GHG emissions 10.7% since 2020**, despite the significant growth of our Pipeline & Storage and Gathering businesses in recent years and an increase in our natural gas production.

Additionally, the Company has **reduced its total consolidated methane emissions 31.5% 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 reduced total GHG emissions while meaningfully growing our business.



Environmental

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Embracing Environmental Stewardship

National Fuel remains driven by our core value of Commitment, making a positive impact on the communities we operate in. This includes our commitment to environmental stewardship and 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. The Company has taken significant steps to reduce 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 Emissions

- Segment-level methane intensity reduction targets
- Natural gas pneumatic device conversions
- Vent gas recovery systems
- Minimizing pipeline blowdowns and operational venting
- Continued downstream and midstream segment system modernization
- Piloting technologies focused on emissions reduction
- Seneca and Midstream Company responsible gas certifications
- Executive compensation tied to emissions reduction efforts
- Fleet vehicle idle tracking program

Since 2020, we've reduced our emissions while growing our business¹

Consolidated Methane Emissions	Consolidated GHG Emissions
31.5% Reduction	10.7% 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 99% of Seneca's produced fluids.
- **Corporate Waste Management Programs** reflect comprehensive plans to ensure the proper management, storage, handling, and disposal of waste.

¹Recent revisions of EPA's Greenhouse Gas Reporting program (40 CFR Part 98) are effective for 2025 reporting. Due to these regulatory changes the Company has revised calculations of the assigned baseline year and progress against these targets.

Greenhouse Gas Emissions

For 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. While progress has been made, National Fuel must be aware of regulatory developments that impact this progress.

Effective January 1, 2025, the EPA revised the Greenhouse Gas Reporting Program (GHGRP), which includes new emissions sources, revised emissions calculation methodologies, and updated emissions factors for certain sources. As a result, the Company updated its methane intensity calculations to reflect these changes, which is incorporated into both the baseline metrics and reported progress beginning with our calendar year 2025 disclosures.

In light of these regulatory reporting updates, and in consideration of continued growth across the Company’s operations, National Fuel has decided to discontinue the consolidated absolute GHG emissions reduction target. The Company does, however, plan to continue reporting our absolute emissions at a consolidated level, and will remain focused on reducing methane intensity across our operations. Consequently, 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 Methane Intensity Emissions Reduction Targets	Progress Against 2020 Baseline ¹	Ongoing Sustainability Initiatives
Exploration & Production	40% Reduction	84.1% Reduction	- Enhancing methane emissions detection and reduction through source-level, facility-scale, and continuous monitoring technologies - Incorporating low-emission design standards into all new well pads - Converting pneumatic devices - Maintaining updated BMPs for well liquids unloading and flowback
Gathering	30% Reduction	47.8% Reduction	- Converting natural gas-driven pumps and pneumatic devices - Upgrading engines to cut combustion emissions - Enhancing fugitive emissions monitoring program
Pipeline & Storage	50% Reduction	29.3% Reduction	- Utilizing recovery systems to capture and minimize venting from blowdowns and compressor seals - Converting natural gas-driven pump and pneumatic devices - Replacing and repairing isolation vents/valves - Enhancing fugitive emissions monitoring program
Utility	30% Reduction	16.4% Reduction	- Investing in system modernization through replacement of mains and services - Expanding supply of renewable natural gas and responsibly sourced gas in systems to offset traditional gas - Exploring hydrogen blending projects - Reducing leak backlog - Evaluating non-pipe alternatives - Offsetting Scope 2 emissions through the installation of solar array

¹Recent revisions of EPA's Greenhouse Gas Reporting program (40 CFR Part 98) are effective for 2025 reporting. Due to these regulatory changes the Company has revised calculations of the assigned baseline year and progress against these targets.

Consolidated Greenhouse Gas and Methane Emissions

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

Scope 1 Greenhouse Gas Emissions (Metric Tons CO ₂ e) ¹		2025
Total Downstream Segment	EPA Mandatory Reporting ²	78,019
	Additional EPA Sources ³	1,261
	Other Sources ⁴	95,224
	Total Downstream Segment	174,504
Total Midstream Segment	EPA Mandatory Reporting ⁵	982,976
	Additional EPA Sources ⁶	165,470
	Other Sources ⁷	4,034
	Total Midstream Segment	1,152,480
Total Upstream Segment	EPA Mandatory Reporting ⁸	136,413
	Other Sources ⁹	26,511
	Total Upstream Segment ¹⁰	162,924

Scope 1 Methane Emissions (Metric Tons CH ₄ as CO ₂ e)		2025
Total Downstream Segment	EPA Mandatory Reporting	77,897
	Additional EPA Sources	1,261
	Other Sources	86,590
	Total Downstream Segment	165,748
Total Midstream Segment	EPA Mandatory Reporting	319,745
	Additional EPA Sources	107,389
	Other Sources	738
	Total Midstream Segment	427,872
Total Upstream Segment	EPA Mandatory Reporting	40,925
	Other Sources	127
	Total Upstream Segment	41,052

Scope 2 Greenhouse Gas Emissions (Metric Tons CO ₂ e)		2025
Total Downstream Segment		979
Total Midstream Segment		4,932
Total Upstream Segment		759

System Modernization Drives Utility GHG Emissions Reductions

The amendments to the EPA's GHGRP reduced the emission factors for most types of utility mains and services by more than 50%. This change significantly alters current and previously estimated emissions for this category. Using the revised emission factors and employing the methodology used by the EPA, system modernization through 2025 has resulted in a 90% reduction in emissions since 1990. As the system approaches full modernization in the coming years, emissions from mains and services are expected to be more than 95% below 1990 levels.¹¹

Recent accomplishments include:

- Replacing or retiring cast/wrought iron and non-cathodically protected steel mains at an average rate of 7.7% per year from 2021 to 2025.
- Reducing inventory of non-cathodically protected steel mains by 10.9% and cast/wrought iron mains by 7.4%. The overall

System modernization has resulted in a **90%** reduction in emissions since 1990.

¹CO₂e 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.

²Emissions subject to EPA's Greenhouse Gas Mandatory Reporting program (40 CFR Part 98, Subpart W) as amended May 14, 2024 (89 FR 42062).

³Includes emissions from: Distribution Corporation-owned transmission pipeline and gathering segments that are subject to Subpart W, but do not meet the reporting threshold.

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

⁵Emissions calculated using the EPA's GHGRP's 2024 revisions. 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.

⁶Includes emissions from sources that are subject to EPA's GHGRP but do not meet the reporting threshold.

⁷Includes emission sources as preferred by SASB which are outside the requirements of EPA's Greenhouse gas reporting program, such as sources identified under NGSi, office building and fleet vehicle emissions.

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

⁹Includes emission sources as preferred by SASB which are outside the requirements of EPA's GHGRP, such as sources identified under NGSi, office building and fleet vehicle emissions.

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

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

Drivers of Emissions Reduction Efforts

National Fuel is committed to reducing GHGRP 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	
Fugitive Emissions Monitoring (All Segments)	Implemented regular fugitive emissions inspections utilizing an array of approaches including audible, visual, olfactory (AVO) techniques, optical gas imaging (OGI) equipment, and alternative EPA-approved methods for the detection and mitigation of fugitive emissions.
Minimizing Pipeline Blowdowns (Downstream and Midstream Segments)	Leveraging maintenance schedules and implementing improved operational practices, and having more robust data collection.
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.
Natural Gas Pneumatic Device and Pump Conversion/ Replacement (Midstream and Upstream Segments)	Conversion of 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.
Compression Operations Minimization of Venting (Midstream Segment)	Development and implementation of best management practices to reduce venting.
Vent Gas Recovery Systems (Midstream Segment)	Utilization of Vent Gas Recovery (VGR) systems to capture gas that would otherwise vent to the atmosphere.
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.
Produced Water Tank Mitigation (Upstream Segment)	Implemented control devices to mitigate entrained methane emissions from produced water tanks on all new well pads.
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.

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	- Installed new software targeting facilities with a higher potential to leak, guiding and accelerating leak surveys. - Maintains a program that digitally tracks time vehicles spend idling to provide data and encourage employees to decrease fleet idling time while in the field. - Installed 750kW solar array at local service center to offset Scope 2 emissions.
Midstream Segment	- Converting natural gas pneumatic devices and/or pumps to utilize air/ electric systems. - Utilization of VGR systems 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. - Utilizing improved software technologies for data collection and tracking.
Upstream Segment	- Seneca maintained it’s membership in the Appalachian Methane Initiative, a collaborative industry effort focused on measuring, monitoring, and reducing methane emissions in the Appalachian Basin using advanced technologies and standardized practices. - Installed FLIR ADGiLE cameras at two well pads to improve facility design and reduce emissions. - Piloted Gas Assisted Plunger Lift (GAPL). During GAPL, gas is injected down the well to bring the plunger to the surface and help the well flow better; this is done in a closed loop system to reduce emissions from well liquid unloading.

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 National Fuel’s 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 and gathering certified

Encompasses the following principles:

- Corporate Governance, Transparency & Ethics
- Human Rights, Social Impacts and Community Development
- Indigenous Peoples’ Rights
- Fair Labor and Working Conditions
- Climate Change, Biodiversity and Environment

Achieved Peer-Leading Certification

Seneca	Midstream
A	A



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 2026

Certification focuses on three (3) 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 2025, over 20,000 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 2025 Campaign showed that the average methane emission intensity across all unconventional production sites was 0.09%. 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 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, compressor unit isolation and blowdown valve leakage, and engine crankcase venting), and then vented emission sources (which include, among other things, pneumatic devices, blowdowns and Other Large Release Events²). The Midstream Segment is committed to transitioning from traditional natural gas-driven pneumatic devices to air systems and continues to dedicate resources to support this initiative.

Additionally, in 2025, the Company utilized Vent Gas Recovery (VGR) systems to capture and recover natural gas from dry gas seals and planned compressor blowdown events. Furthermore, the Midstream Segment is continuously refining its valve maintenance and replacement program aimed at minimizing leakage from isolation and blowdown valves. Lastly, the Midstream Segment is focused on data quality through the use of automation to improve accuracy and availability of field data.

Scope 1 Greenhouse Gas Emissions by Source Category (Metric Tons CO ₂ e)	2025
Combustion Sources	784,856
Fugitive Emissions	226,355
Vented Emissions	115,094
Process Emissions	12,973
Flared Hydrocarbons	13,203
Total Midstream Segment	1,152,480

Upstream Segment

Seneca continues to implement and refine methane mitigation strategies, which include best management practices, technology, and enhanced methane detection protocols.

- Seneca has implemented a strategy for the management of liquid unloading practices, which continues to show reduction in vented emissions, even as wells mature. The strategy combines 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, converting 85% of devices by the end of 2025.
- The installation of control devices to mitigate entrained methane emissions from produced water tanks has been incorporated into the design of new well pad facilities.

Scope 1 Greenhouse Gas Emissions by Source Category (Metric Tons CO ₂ e)	2025
Combustion Sources	121,570
Vented Emissions	36,806
Flared Hydrocarbons	0
Process Emissions	1,637
Fugitive Emissions	2,911
Total Upstream Segment	162,924

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 Other Large Release Events, as defined by Part 98, are included based on available data.

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)
- Site-specific analyses and stack test results
- Emissions modeling software (e.g., GRI-GLYCalc, TankESP, ProMax)
- Published emission factors (e.g., Manufacturer, AP-42, 40 EPA's GHGRP)
- Records of leaks discovered and leak duration
- Site-specific inventories (including natural gas-driven pneumatic devices)

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

Midstream Segment Criteria Pollutants (Metric Tons)	2025
NO _x	611
SO _x	9
VOC	248
PM ₁₀	32

Upstream Segment

Seneca has implemented internal controls to ensure the accuracy and completeness of its emissions profile and continues to perform aerial flyovers and, in 2025, collaborated 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's GHGRP).

Upstream Segment Criteria Pollutants ² (Metric Tons)	2025
NO _x	419
SO _x	2
VOC	48
PM ₁₀	13

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 Testing and Monitoring:** 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. Seneca has also reviewed opportunities to change from diesel equipment to natural gas -fired equipment, which can reduce PM₁₀ emissions.
- **Engine Utilization:** If the site requires diesel power, Tier 4 engines are utilized where possible instead of Tier 2 engines. Tier 4 engines have much stricter emissions controls which reduce PM₁₀ and NO_x emissions.
- **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.
- **Leak Detection and Repair:** Enhancing fugitive emissions monitoring program.
- **Electric Frac Fleet (Upstream Segment Only):** In February 2026, Seneca transitioned to an electric frac fleet, significantly reducing diesel consumption and, consequently, lowering 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. Additionally, leveraging automation and electrical upgrades to improve emissions data quality.

¹Qualitative 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.

²Upstream Segment data does not include Highland Field Services. Criteria pollutant emissions for Highland Field Services are provided in the appendix.

Ecological Impacts and Biodiversity Protection

Managing Our Environmental Programs, Policies, and Practices

National Fuel remains focused on ensuring our operations have minimal impacts on the environment and natural resources in and around our operating footprint. Environmental protection and conservation of resources are embedded within our policies and procedures to ensure we're developing, building, and operating our assets in a manner that respects the environment.

Consistent with our [Environmental Policy Statement](#), the Company continues to prioritize compliance with all environmental laws and regulations as well as integrating environmental conservation and protection 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, 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 team facilitates and ensures compliance by coordinating effective management policies and practices for our projects and assets within our service territory. The Company maintains guidance and specifications relating to resource impact minimization and environmental compliance, which helps facilitate a standard playbook for planning, construction, and restoration. 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 teams 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.

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 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. National Fuel works closely with federal and state agencies to identify ecologically sensitive areas to avoid, whether threatened and/or endangered species exist in that area, or whether there is high ecological value in terms of ecosystem function, species richness, or species diversity.

Committed to Environmental Stewardship During Project Development

During planning for the Tract 007 to Webster Pipeline Project in Pennsylvania, environmental reviews identified a nearby Great Blue Heron rookery, prompting consultation with the Pennsylvania Game Commission (PGC). The Company worked closely with the PGC pre-construction to develop and implement a monitoring program for the Great Blue Herons during construction, including regular observations by a qualified biologist to assess heron nesting activity and behavior. Monitoring confirmed that the rookery remained active throughout the nesting season, with no signs of disruption observed despite ongoing construction activities. This successful outcome reflects the Company's commitment to work collaboratively with regulators and proactively protect sensitive wildlife habitats, furthering our commitment to environmental stewardship.



Regulatory Agency Engagement	Environmental Stakeholder Engagement	Community Outreach and Landowner Engagement
• 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 • Natural Heritage Programs in New York and Pennsylvania • 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	• 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, including potential concerns related to storm water, floodplains, civil engineering, and steep slope stabilization/mitigation • Conduct project routing and planning exercises to assist with resource avoidance, impact minimization, and development of project-specific alternatives	• Early and regular engagement, coordination, negotiation, and issue-resolution with 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 for the duration a project • Conduct and participate in public meetings to discuss potential short term and long term environmental considerations with the public, including, but not limited to, landowners, governmental authorities, and tribal representatives

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 frameworks and procedures, projects may necessitate:

- Threatened and endangered species mitigation measures
- Wetland 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 follows and implements agency-approved permits and plans 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

As part of the construction process, National Fuel's 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-construction 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. The Company monitors 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 and 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, including grading and topsoil replacement, and restoration of natural contours and drainages. Excess rock is removed from the top foot of soil in all agricultural fields, pastures, and residential areas, and buried rock above the top of existing bedrock profile is removed in agricultural lands. Construction debris is also removed and properly disposed of. 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. National Fuel has established standardized guidance related to inspections of inactive construction projects, and has developed a notification system for inspection of active/inactive sites before and after inclement weather. Project sites also undergo frequent agency inspections, often unannounced, and the Company considers 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, National Fuel seeds 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

National Fuel aims to avoid areas inhabited by species with a protected conservation status of endangered, and works 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, preserving, and restoring habitats, and, restricting construction activities during biologically sensitive periods. Specialized native seed mixes are used during replanting to minimize 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.

Midstream Segment Land Owned, Leased, or Operated within Designated within Areas of Protected Conservation Status or Endangered Species Habitat	2025
Total Operating Footprint (Acres) ²	16,075
Operating Footprint (Acres) Near Designated Areas ³	8,218
% of Total	51%
Operating Footprint (Acres) Within Designated Areas ⁴	256
% of Total	2%

¹Disclosures surrounding operations within designated areas (designated areas meaning areas with protected conservation status or endangered species status) and hydrocarbon spills are not SASB metrics for utilities, which is why the Downstream Segment is not represented within this section.

² The total acreage analysis is based on area of land that is owned, leased, and operated and excludes land that is owned but not operated. Total acres includes a calculation of all Pipeline Right of Way mileage with an average 50 feet buffer on the pipeline's centerline, as well as a 50 feet buffer of all wells and all stations points. Large station acreage is calculated from the actual footprint of the station operation and is defined as area inside the station fencing.

³ Land operated on within five (5) kilometers of the boundary of lands designated as a protected conservation area or as endangered species habitat.

⁴ Land operated on within the boundary of lands designated as a protected conservation area or as endangered species habitat.

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 2025. 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 Erosion and Sedimentation Control & Agricultural Mitigation Plan (ESCOMP) 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	2025
Acres Not Permanently Restored from Prior Years ⁵	10
Acres Disturbed in Current Year	254
Total Acres Impacted	264
Acres Permanently Restored in Current Year ⁵	176
% of Impacted Area Permanently Restored in current Year ⁵	67%

Our Midstream Segment works persistently to prevent the occurrence of hydrocarbon spills on projects and worksites. Specific plans (e.g., Spill Prevention and Response Procedures Plans; Spill Prevention, Control, and Countermeasure 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 internal procedures and plans, and governing regulations.

⁵Includes acreage associated with projects that commenced permanent restoration in 2025. This includes initiating permanent restoration on projects that were constructed in 2024 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 ongoing. Areas where impervious surfaces or stormwater controls have been installed are also considered to be permanently restored.

⁶ 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.

⁷ Unusually Sensitive Areas in the U.S. are characterized using the definition provided by PHMSA.



Midstream Segment Number and Volume of Hydrocarbon Spills	2025
Number of Hydrocarbon Spills > 1 Bbl ⁶	1
Total Volume of Hydrocarbon Spills Reported (Bbl)	1
Total Volume of Hydrocarbon Spills Recovered (Bbl)	1
Total Volume of Hydrocarbon Spills Impacting Unusually Sensitive Resources (Bbl) ⁶	0
Number of Non-Hydrocarbon Spills > 1 Bbl ⁷	0
Total Volume of Non-Hydrocarbon Spills Reported (Bbl)	0
Total Volume of Non-Hydrocarbon Spills Recovered (Bbl)	0
Total Volume of Non-Hydrocarbon Spills Impacting Unusually Sensitive Resources (Bbl)	0

Upstream Segment

Seneca's multi-well pad development practices allow the Company to maximize the accessible natural gas reserves underground while minimizing the Company's footprint on the surface. We are often able to drill 15 or more wells from a single surface pad and extend the lateral length of our wells over three and a half 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, and identifying future opportunities for development of the Upper Utica zone.

Seneca has submitted more than 130 Pennsylvania Natural Diversity Inventory (PNDI) environmental reviews through the Pennsylvania Natural Heritage Program (PNHP) over the past five (5) years. The PNHP is a partnership between the Pennsylvania Department of Conservation and Natural Resources, the PGC, 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	2025
Total Reserves (Bcfe)	4,981
Reserves within Sites with Protected Conservation Status (Bcfe)	12
% of Reserves within Protected Conservation	<1%
Reserves within Areas in which Endangered Species Habitat Identified (Bcfe)	671
% of Reserves within Areas of Endangered Species	13.5%

Upstream Segment Number and Volume of Hydrocarbon Spills	2025
Number of Hydrocarbon Spills > 1 Bbl	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	1
Total Volume of Non-Hydrocarbon Spills (Bbls)	350 ¹
Total Volume of Non-Hydrocarbon Spills Recovered (Bbls)	Unable to Estimate ²

One Path, Less Impact

In Tioga County, Pennsylvania, Highland Field Services and Midstream Company collaborated to install natural gas and water infrastructure pipelines within a shared right-of-way (ROW). By co-locating the pipelines in one corridor rather than constructing separate routes, the project **reduced land disturbance by approximately 40%**, minimizing impacts to the surrounding environment. The shared approach also enabled water to be transported by pipeline instead of truck, helping reduce local traffic, noise, and emissions while supporting operational efficiency and the Company's commitment to environmental stewardship.



¹The non-hydrocarbon spill involved a produced fluid release at a Seneca well pad. Regulatory agencies were notified upon discovery, and remediation actions were promptly implemented. The reported volume of 350 bbls is an estimate based on professional judgment.
²Some produced fluid mixed with precipitation was recovered, however, an accurate estimate of the total volume recovered could not be calculated.

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 stakeholder engagement opportunities to create, conserve, or enhance natural areas or otherwise afford ecological protection.



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 38 acres of pollinator seed mixes planted in 2025.



2025 Pollinator Program Achievements

- Exceeded our annual goal by 60% and provided 5,032 acres of conservation measures within our CCAA enrolled lands
- Monitored 40 randomly selected plots within ROWs for pollinator and monarch butterfly habitats
- Monitoring results indicated an average of 281 milkweed stems and 50% 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 U.S. Fish and Wildlife Service 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's Surface Footprint Neutral Program

To demonstrate its commitment to the environment, our Upstream Segment created the Surface Footprint Neutral Program to restore one (1) 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 and/or enhanced 99 acres of land and water, surpassing the 55 acres used for construction since the Program began in 2023
- Improved environmental biodiversity as well as community recreational access

Advancing Surface Footprint Neutrality Through Reforestation

A former water pad site was reclaimed through the planting of approximately 2,600 native tree saplings across the restored area, reinforcing the Company's commitment to minimizing its environmental footprint.



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.¹

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, a synthetic oil-based mud system is used 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 and Pre-Plug Water Sampling: Seneca performs pre-drill and pre-plug water sampling at all private water sources within 4,000 feet of the drill pad - an extended radius 1,500 feet over the PADEP Area of Presumption. After compiling a list of property owners within the investigation radius, Seneca retains an independent third-party environmental consultant to conduct landowner outreach. The consultant notifies property owners of planned activities, communicates Seneca’s intent to perform water supply sampling, and coordinates sample collection, laboratory analysis, and result distribution to PADEP and respective landowners. While some landowners opt out of testing, the data gathered in this process provides valuable baseline measurements.

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, Seneca Resources subsidiary Highland Field Services has made significant investments in water infrastructure in Pennsylvania, including storage and treatment facilities, on-pad tanks and containment vessels, 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 2025, Seneca’s Marcellus and Utica shale well completions used 64% recycled fluids and only 36% freshwater.

Reducing Environmental Footprint: Highland’s freshwater and production fluid pipeline distribution systems transport fluid to/from well pads, water withdrawal points, and centralized storage facilities. 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 an operating UIC well 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) products during fracturing operations - the Company continually looks for opportunities to use “green” products 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 2025, Highland recycled more than **99%** of Seneca’s produced fluids.

Waste Management

Corporate Waste Management Program

National Fuel is 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 proper management, storage, handling, and disposal of waste.

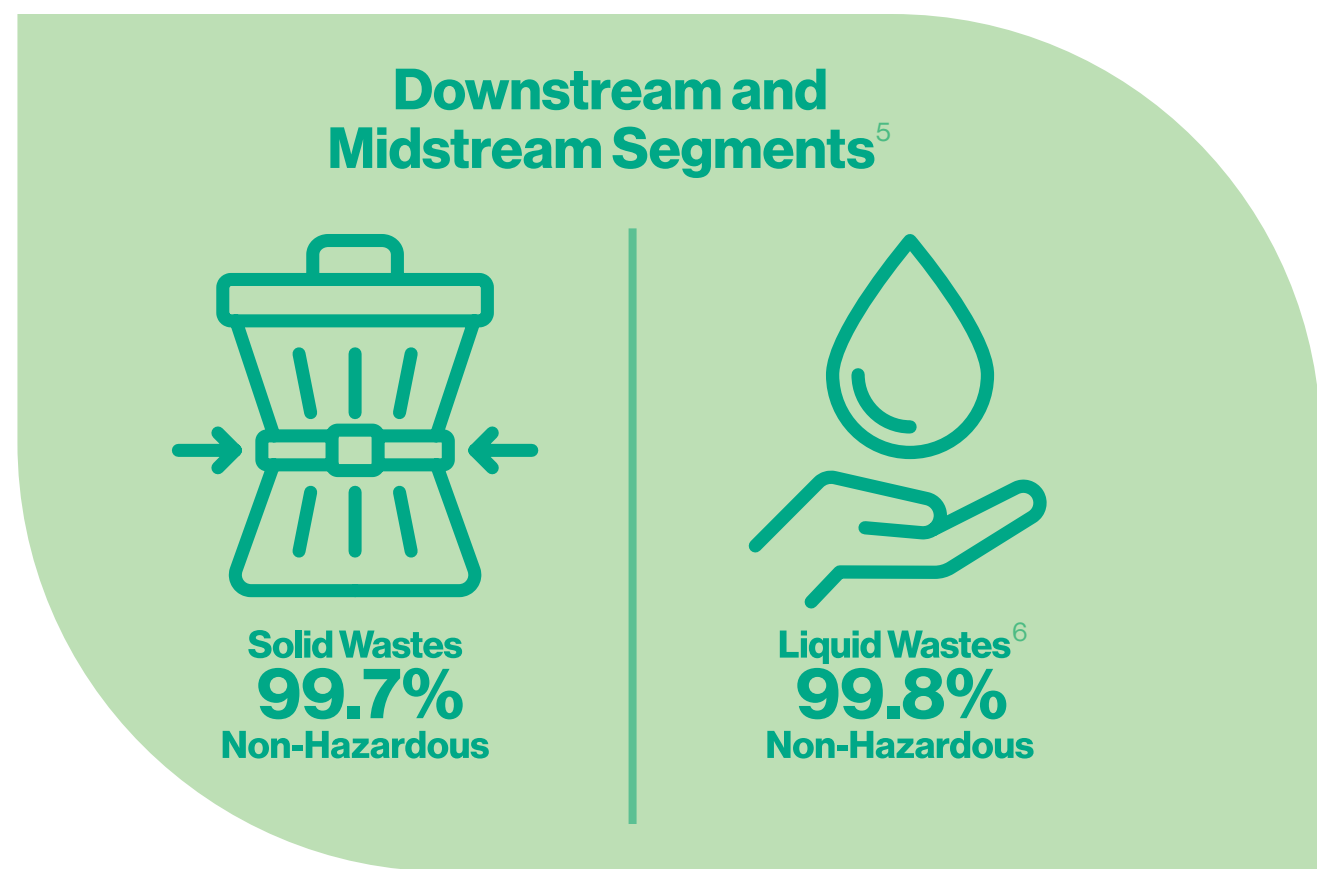
The Company's routine business operations produce various types of waste, including:

- Used oil
- Construction and demolition debris
- Drill cuttings
- Scrap steel
- Non-hazardous waste and residual waste¹
- Universal waste (e.g., used batteries, fluorescent light bulbs, waste aerosols)
- Hazardous liquids and solid waste

Executive level oversight is incorporated into our waste minimization plans, highlighting the importance placed on waste management. Employees are encouraged to promote new ideas for waste minimization, energy conservation, and environmental protection. 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 locations of our Downstream and Midstream segments either do not generate any hazardous wastes or produce small amounts, placing them in the Very Small Quantity Generator² category. In isolated cases, a facility may generate enough hazardous waste to meet the Small Quantity Generator³ or Large Quantity Generator⁴ threshold. Our Upstream Segment did not produce any hazardous waste in 2025.

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.



¹Residual waste is defined as garbage, refuse, other discarded material or other waste, including solid, liquid, semisolid, or contained gaseous materials resulting from industrial, mining, and agricultural operations and sludge from an industrial, mining, or agricultural water supply treatment facility, wastewater treatment facility or air pollution control facility, if it is not hazardous.

²Generate no more than 100 kg (220 lbs) of hazardous waste or 1 kg (2.2 lbs) of acutely hazardous waste in a calendar month.

³Generates 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.

⁴Generates more than 1,000 kg (2,200 lbs) of hazardous waste, or greater than 1kg (2.2 lbs) of acutely hazardous waste in a calendar month.

⁵Our Upstream Segment does not produce any hazardous wastes.

⁶For Midstream in 2025, 31.72 thousand cubic meters of produced water and flowback were generated, 74.3% was injected for disposal, and 25.7% was reused.

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 updates.
- 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 unneeded products or wastes. Our 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 the Company's 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 multi-phase liquids to chemical treatment of wastes that render them non-hazardous or less hazardous. For example, natural gas may be decanted 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 2025, our Downstream and Midstream Segments continued to refine and utilize waste management best practices.

- ✓ **Recycled nearly all of our scrap steel**, which accounts for more than 3.4 million pounds of non-hazardous solid wastes
- ✓ **Recovered, recycled, or reused 99.4%** of non-hazardous liquid wastes
- ✓ Solid waste generation has **decreased 13.5%** since 2023
- ✓ **Incorporated innovative reuse options** for non-hazardous solid waste generated from well reworking activities, allowing the Company to **successfully reuse** non-hazardous solid waste
- ✓ **Implemented alternative recycling options** for non-hazardous wastewater, resulting in **64,000+ gallons** being sent to a recycling facility



Reuse in Action - Furniture Donations

In addition to administering a formal waste management program, National Fuel is constantly looking for ways to turn office surpluses into donations for local organizations. National Fuel has partnered with various local organizations to donate gently-used desks and chairs no longer in use by the Company.¹



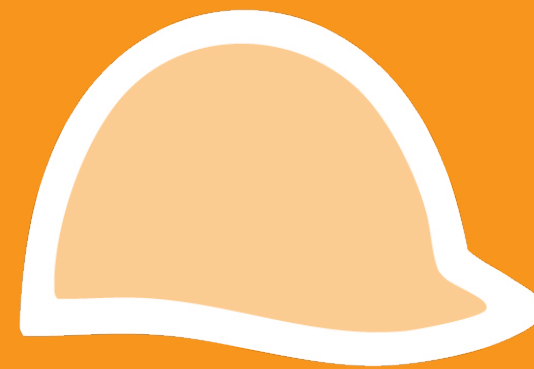
Safety

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Safety Culture and Highlights

Our highest priority is the safety of our customers, employees, contractors, facilities, and the communities we serve. We reinforce this priority through our core value of Safety, which supports the Company’s safety-first culture. National Fuel empowers every employee and contractor with Stop Work Authority/Responsibility and encourages proactive reporting of safety observations, near misses, and lessons learned. Through visible leadership commitment, clear expectations, and shared accountability, the Company works diligently to maintain and continuously improve its safety culture, and is proud to have built a strong safety record, with our best ever Days Away, Restricted, or Transferred (DART) rate recorded in 2025.



Safety

We foster a safety-first culture built on awareness, action and accountability.

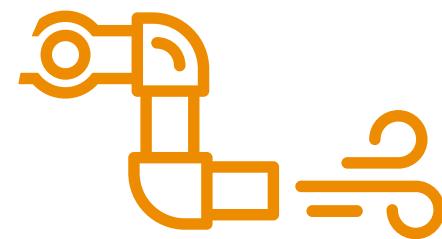
- **Lowest Historical DART rate recorded in 2025**



Recognized **National Pipeline Safety Day** through a company-wide awareness campaign and employee communications



Safety culture continuously reinforced with frontline operational employees



Continued focus on **leak management programs** across all segments



50+ meetings held with 1,500+ local emergency responders



142 emergency response drills with 3,000+ participants

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
- Leadership site visits
- Safety shares and communications

Safety Management Systems

- **Downstream and Midstream Segments’ 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 are designed to promote consistent, safe performance, and reinforce our core value of Safety. To strengthen this safety culture, the Company prioritizes in-person safety engagements, including presentations and field interactions where executive leadership and management visibly endorse Safety expectations, reinforce individual accountability, and encourage employees and contractors to speak up, report concerns, and stop work when conditions are unsafe.

Employee Safety Programs

- First Aid/CPR/AED Training available to all employees
- Hazardous Energy Control/Lockout/Tagout 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
• 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 • Recognition and reward program acknowledging positive safety performance and actions	• 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 first aid, and situational awareness • Vehicle and driver training, including the use of cameras in some vehicles	• Downstream Field Operational Safety Days for employees to focus on reinforcing safety practices and strengthening safety culture • Stop Work Authority/Responsibility for all employees and contractors who observe a potentially 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 to discuss field safety issues	• The Company's Internal Audit Department, which evaluates National Fuel's environmental and safety programs, conducts periodic reviews • 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 safety messaging

Continuous Improvement of Our Operational Safety Plan

Management's Safety Prioritization	• Leadership from the Operations and Safety departments meet regularly to review injury trends, safety observations, motor vehicle accidents, and concerns raised at safety meetings • Maintain established safety goals for all employees • Continued engagement with employees to monitor work plans and execution expectations
Feedback from Operations Teams	• 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 • Facilitate safety coordinator engagement and continued collaboration
Reinforcement of Safety Culture	• Mandatory safety training for employees to expand their knowledge and understanding of how safety aligns with their daily responsibilities • Field-based new hires receive comprehensive job site safety training to promote safe working practices • Multi-disciplinary teams conduct safety inspections and audits • Safety alerts and messages are regularly distributed to all employees
Focus on Operational Improvements	• Safety First focus for all project planning, pre-project communications, and execution in the field • Safety standdowns to address recurring and serious safety issues • Root Cause Analysis drives specific action plans to prevent incidents and injury recurrence • Incident review meetings facilitate the identification of control measures and process enhancements aimed at preventing future incidents



Contractor Management

- The Company's contractor management procedures are designed to reinforce our safety expectations and help ensure that contractor activities are performed in a manner consistent with our safety standards. Contractors are expected to meet the following requirements:
- Safety pre-qualifications and reporting on EHS performance
- Proof of compliance with OSHA and other required training

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

If a contractor's safety performance does not meet Company expectations, a corrective action plan is implemented in collaboration with the contractor, and the Company increases oversight as appropriate. If performance does not improve, the contractor may be 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 Resources, training is a fundamental element of our safety program. All employees are required to complete monthly computer-based safety training that addresses key field and workplace hazards, including ergonomics, heat stress, winter weather hazards, driving safety, and hazard communication. Each module concludes with a knowledge check that employees must pass to verify comprehension and successful completion of required safety training is tied to employee and officer compensation. In addition to monthly training, employees complete role-based, in-person, hands-on training courses as applicable, including First Aid/CPR/AED, Aerial Lift and Fall Protection, and HAZWOPER.

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, National Fuel policies and procedures, and industry best practices.

- The Operator Qualification (OQ) Program includes in-person sessions with lecture components, hands-on evaluations, on-site job demonstrations, and practical field exposure.
- 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 exposure.

Quality Assurance Group

- Our OQ Effectiveness Review program is an iterative process to identify areas of improvement for training content and classroom material, assess internal trainers, evaluate class content, and manage field assessments performed by Operations supervisors.
- The 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 operator qualifications 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 stakeholders, including the affected public, emergency responders, excavators, and public officials, National Fuel intends to raise awareness about our pipeline facilities and help the public better understand the role they can play in pipeline safety.

2025 Gas Safety Campaigns

- **Call Before You Dig and Gas Safety campaigns** resulted in 140+ million impressions using digital, billboards, transit, radio, and paid social and demand advertising concerning natural gas and pipeline safety.
- **Direct Public Awareness Mailings:** Circulation of safety information to more than 112,000 stakeholders, including the affected public, excavators and contractors, emergency responders, and public officials.



Educational Objectives	External Stakeholder Engagement	Public Outreach
● One-Call System: Encourage third-party use of a notification system prior to excavation ● Improve Recognition: Identification of physical indications of a possible release ● Know What To Do: Public safety steps on how to detect, identify and report a potential gas pipeline release	● 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)	● 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

Public Awareness Program

Our Downstream and Midstream segments dedicate significant resources to educating the public on the importance of safe excavation practices to help National Fuel identify potential risks and prevent damage to our system.

Awareness Campaigns

- The “Call Before You Dig” campaign, including multi-media educational outreach to local municipalities and third-party excavators
- The “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 512 excavation interventions in 2025
- Damage Prevention Coordinators engage 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; the Utility has installed approximately 231,905 EFVs¹
- Damage Prevention Inspection Program that utilizes a risk modeling system to identify threats to National Fuel 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

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 contractors’ 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 employees to act as gatekeepers within the communities we support. Our customer service representatives and field personnel interact with hundreds of customers daily and are positioned 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 report concerns to their supervisor when they believe someone requires assistance.

As part of this program, employees are trained to identify potential indicators, including:

- | | |
|---|--|
| • Snow-covered driveways/ walkways | • Declining condition of home/lawn |
| • Snow-covered home vents/ exhausts | • Challenges with seeing, speaking, hearing, or moving |
| • Accumulated or uncollected mail | • Unattended children or pets |
| • Difficulty paying bills/affording basic needs | |

Over the past 3 years, our Operations and Customer Service teams have made more than **984 safety referrals** through the Gatekeeper Program.



**Know what's below.
Call before you dig.**

Emergency Preparedness and Response

We are committed to emergency preparedness through disciplined planning, training, and frequent practice. If an incident occurs, we are prepared to respond quickly and effectively to protect our employees, contractors, customers, and the communities we serve. The Company maintains emergency and spill response plans and conducts regular tabletop exercises, drills, and cross-functional simulations across operational departments to strengthen communication, validate roles and responsibilities, and incorporate lessons learned into our response procedures. 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



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



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



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



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



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

2025 Utility Emergency Response Time

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 55 external emergency response services and government agencies across our operating territory



More than 1,548 firefighters attended free, in-person training; many participated in National Fuel's 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 at the same location at the same time.
- Pre-startup safety reviews are conducted when commissioning a new well pad or new pipeline facility.
- Digital change management protocol evaluates proposed changes and verifies that new hazards are not being introduced or are being appropriately mitigated.
- Our regulatory compliance program is used to track new rules, update our procedures and compliance requirements, and review regulator-initiated enforcement actions that have been filed against peer companies.



Integrity of Gas Delivery Infrastructure Risks

National Fuel's inspection and maintenance efforts are designed to meet or exceed regulatory requirements, and we continue to make significant investments to ensure 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 in the industry.

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

Narrower, medium-pressure pipes are installed 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 for the relocation of gas meters to the outside of homes and businesses, which improves safety and ease of operations and maintenance. Additionally, system upgrades to medium-pressure reduce the risk of customer outages associated with blockages or high downstream demand.

Over the past five (5) years, Distribution Corporation has invested more than **\$569 million** in the safety of our utility pipeline network, including system modernization.

The Company does not have any known cast iron pipelines 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 (5) years, the Midstream segment has invested more than **\$556 million** to improve system safety and reliability. National Fuel expects 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, National Fuel's Gas Storage Group has used its Storage Integrity Management Plan (STIMP) 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

78%

5,179 Miles
Modernized

Services Modernized

84%

201,037 Services
Modernized

Leak Management Program

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



Downstream Segment

- 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

- 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

- Routine operator visits and inspections of well pad facilities
- Monthly audible, visual, and olfactory (AVO) inspections of all facilities
- Optical Gas Imaging 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

54.5% reduction in year-end outstanding leaks from 2021 to 2025



Our Upstream Segment reduced fugitive emissions by 92.1% from 2020 to 2025

Safety Management Systems

Pipeline Safety Management System (PSMS)

Our Downstream and Midstream segments have implemented a PSMS modeled after the API Recommended Practice 1173. The implementation of PSMS has strengthened internal stakeholder engagement and fostered a more proactive safety culture that prioritizes continuous improvement.

PSMS is structured around 10 essential elements, with their maturity assessed on a five-point scale. In 2022, the AGA published an industry-wide Commitment to Enhancing Safety, Environmental Stewardship, and Security, which set an expectation for members to achieve a maturity level of three (3) or higher for each PSMS element within five (5) years. An assessment of National Fuel's PSMS was finalized by an external consultant in 2025, which confirmed that **all 10 elements met or exceeded AGA's benchmark two (2) years ahead of schedule.**

Seneca Resources' Integrated Management System (IMS)

Seneca Resources' Integrated Management System (IMS) is aligned with internationally recognized management-system frameworks, including ISO 14001 (Environmental Management) and ISO 45001 (Occupational Health and Safety Management), as well as Equitable Origin's EO100™ Standard for Responsible Energy Development and the International Finance Corporation Performance Standards.

While Seneca Resources does not currently pursue formal ISO certification, these frameworks inform the structure of our upstream policies, procedures, and continuous improvement processes. In addition, Seneca Resources maintains BMPs for critical operations, including containment construction and flowback operations.

Inspection and Maintenance Programs

Pipeline Programs	Integrity Assessment Inspection Methods and Technology	Upstream Segment Well Pad Programs
- Quarterly, semi-annual, and annual pipeline patrols - Leakage surveys, including business district, public buildings, and frost surveys, as well as additional targeted risk-based quarterly and semi-annual leak surveys - Monthly leak surveys of schools, hospitals, and nursing homes - Annual regulator and valve inspections - Annual pressure regulating station inspections - Continuous Supervisory Control and Data Acquisition (SCADA) and remote monitoring of operating pressures - Atmospheric corrosion inspections - Odorant inspections - Bi-monthly and annual cathodic protection monitoring - Annual emergency valve inspections - Underwater inspections of waterbody crossings - Incident investigation and root cause analysis - Plastic system leak analysis and remediation program	- In-Line Inspection (ILI) utilizes modern smart pigging tools, as pictured below, 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 eight (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 (7) years using the technology as specified above	- Quarterly documented mechanical integrity inspections - Monthly AVO inspections - Bi- or tri-annual greasing program for production trees - Painting of equipment to prevent corrosion - Testing of pressure relief valves - Annual calibration and testing of lower explosive limit detectors - Plunger/bottom hole assembly inspections - Fuel meter calibrations and oil changes - Annual 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.

The Company's 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 define 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 from the American Welding Society 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 on in-service lines, 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 OQs, including training, testing, and performance evaluations for company and contractor personnel
- A comprehensive commissioning and start-up procedure



Core Value of Excellence Reflected in Construction Management

- Established engineering design, construction and inspection manuals
- Construction inspectors attend annual training
- Internal audits, project assessments and lessons learned built into Construction Quality Management System



Excellence

We work as a team, driving best in-class operations, reliability and continuous improvement to deliver superior results.

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 other 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 (STIMP)	Well Plugging and Decommissioning Program
All Programs	• 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	• Performance measures, metrics, and program data analysis • Management of Change • Quality assurance program • System knowledge • Damage prevention program	• 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	• 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	• Assurance of proper plugging with cement to permanently prevent the release of gas from the storage reservoir • Post plugging annular vent inspections 

Social

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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 customers and communities. **National Fuel has approximately 2,360 employees across New York, Pennsylvania, and Texas.** 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.



Workforce Development Opportunities

- Empower Mentoring Program
- Fuel for Success quarterly skills training
- Town hall career conversations with independent directors
- Career and leadership development opportunities
- Resources for Improving Supervisor Excellence (RISE) Program at Seneca Resources and Highland Field Service



2025 Workforce Highlights

- Employees covered by collective bargaining agreements – 46%
- Diverse executive and senior level officials¹ – 32%
- Females – 26%
- Racially/ethnically diverse – 9%
- Veterans – 5%
- Workforce participation in Employee Resource Groups (ERG) - 16%²



Investing in Our Employees

- Competitive compensation and benefits packages
- Prioritization of employee safety and wellness
- Encouragement of community involvement and volunteerism
- Ongoing employee engagement
- Company-supported Employee Resource Groups
- Mental health and wellness programs for employees and their households

Core Values Reinforce Foundation of Company Culture

At National Fuel, our core values – **Safety**, **Excellence**, **Integrity** and **Commitment** – provide clarity, consistency, and a shared foundation that strengthens our culture across the company. We are committed to embedding our core values within our corporate culture and making them actionable in everything we do, from hiring and training to development and recognition.



Safety

We foster a safety-first culture built on awareness, action, and accountability.



Commitment

We fuel lives every day and are proud to make a positive impact where we live and work.



Excellence

We work as a team, driving best-in-class operations, reliability, and continuous improvement to deliver superior results.



Integrity

We do the right thing, guided by integrity, honesty and respect.

¹Includes gender diverse, veteran, racially/ethnically diverse, and disabled employees within reporting category. Executive/Senior Level Officials EEO-1 reporting category includes executives, general managers, and other senior professionals.
² Total workforce participation does not account for individual employees who have elected to participate in multiple employee resource groups (ERG).

Employee Attraction, Retention, and Development

The Company aims to attract the best employees and 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 harmony and create a safe, inclusive, and productive work environment for everyone.



Healthcare Benefits	Financial Benefits	Insurance Benefits
• Medical • Prescription drug • Dental • Vision • Inclusive fertility coverage • LGBTQ+ benefits guide	• 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	• Life insurance • Accidental death and disability • Short-term disability • Long-term disability • Optional life insurance • Business travel accident
Lifestyle Programs	Community Development and Training	Community Involvement Encouraged
• Hybrid in-office/remote work options, where feasible • Paid time off • 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	• 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 and Seneca Enrichment skills training programs • Rotational opportunities for engineering and business salaried employees	• 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 (ERG) • Paid military leave² • Support for employee involvement in local non-profit and community boards

¹Our 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 position.

²Company 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.

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

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.

- **Program Bolsters Retention Rate:**
92% of mentees who participated in the program are still with the Company
- **Top Areas of Focus:**
Career Development, Building Relationships, Individual Development, and Communication Skills

Program Satisfaction

Mentee Ratings



4.4/5 Stars

Mentor Ratings



4.4/5 Stars

Relationship Satisfaction

Mentee Ratings



4.9/5 Stars

Mentor Ratings



4.8/5 Stars



Mentee: Summer H. (4+ years)

Mentor: Randy R. (24+ years)

Fuel for Success Professional Skills Development Programs¹

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

Skills addressed through these trainings included:

- Time management workshop
- Sustaining healthy habits
- Microsoft Office training (e.g., Excel, Word, PowerPoint)
- Emotional intelligence and self-awareness
- Self-assessments of work behavior and communication
- Building trust and communication at work

Career Growth through Community Leadership Programs

Investing in our workforce through these local leadership programs encourages employees to assess and develop their own professional skill sets and engage with our communities.



FEMALEFuel

Several members of National Fuel's FemaleFuel Employee Resource Group coordinated its memberships' attendance at the Annual WNY Women's Foundation Leadership Summit in Buffalo, New York. FemaleFuel members connected with peers across sectors, leaning into conversations and sharing viewpoints from a variety of experiences while demonstrating the group's founding pillars of professional development and networking.

Internship Impacts: Building a Full-Time Talent Pipeline

In 2025, National Fuel hosted 54 paid interns—its largest cohort to date—and offered hands-on experience and professional development across key functions, including Information Technology, Engineering, Operations, Geology & Geophysics, Production, Legal, and Accounting. Interns contributed to projects supporting operational excellence, regulatory compliance, financial analysis, and technology advancement. These interns were also exposed to mentorship opportunities in all these areas.

Strong engagement was reflected in nine (9) interns returning for additional semesters. The program also continued to serve as an effective talent pipeline, with seven (7) interns transitioning to full-time roles upon graduation—strengthening early-career development while supporting critical business needs.



Carlos L., *Command Center Analyst
Information Security*

"My internship gave me a much better understanding of how cybersecurity and IT function within an organization, especially in a critical infrastructure environment. I was able to work alongside knowledgeable professionals who were willing to teach, support, and include me in meaningful projects. That experience showed me that National Fuel was a place where I could continue learning, contribute to important work, and grow professionally."



Anna G., *Engineer
Engineering Services*

"My internship gave me a clear understanding of how environmental compliance is applied within the natural gas industry. I had the opportunity to collaborate with experienced professionals who were incredibly supportive and willing to mentor interns. The combination of meaningful work, a strong team culture, and exposure to real compliance challenges made it an easy decision to continue my career here."

Seneca's Summer Interns Get a Firsthand Look at Field Operations

Seneca's summer interns had the chance to step out of the office and into the field for a tour of the company's operations. The group traveled from Pittsburgh to North-Central Pennsylvania to get a firsthand look at the full cycle of natural gas development. Stops included an active drilling rig, frac site, producing pad, midstream compressor station, and a plugging rig – giving interns valuable insight into the technical, logistical, and environmental considerations behind each phase.

Interns from a wide range of departments took part in the tour, including Geology, Geophysics, Production, GIS, Accounting, and Stakeholder Relations. The experience provided a broader understanding of how their roles contribute to Seneca's mission of safely and responsibly producing natural gas.



Utility Technician Intern-in-Training Program (UTIP)

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

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



Denise B., *Utility Technician
Field Operations*

The UTIP program helped prepare me for full-time employment by allowing me to intern as a full-time employee with on-the-job training. This helped me understand what it would be like when I actually started working. The Company helped me move comfortably into my full-time position - with additional training when needed - staying with me every step of the way.

Corporate Partner for "Say Yes" Apprenticeship Program

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

National Fuel partnered with Say Yes Buffalo in 2024. This program gives students the opportunity to earn while they learn by combining college coursework with hands-on work experience. Apprentices split their time between school and working at National Fuel, helping them build skills and gain real-world experience in their chosen career field. We currently have two students participating in this program: Jesus G. in IT and Atika M. in Engineering.

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

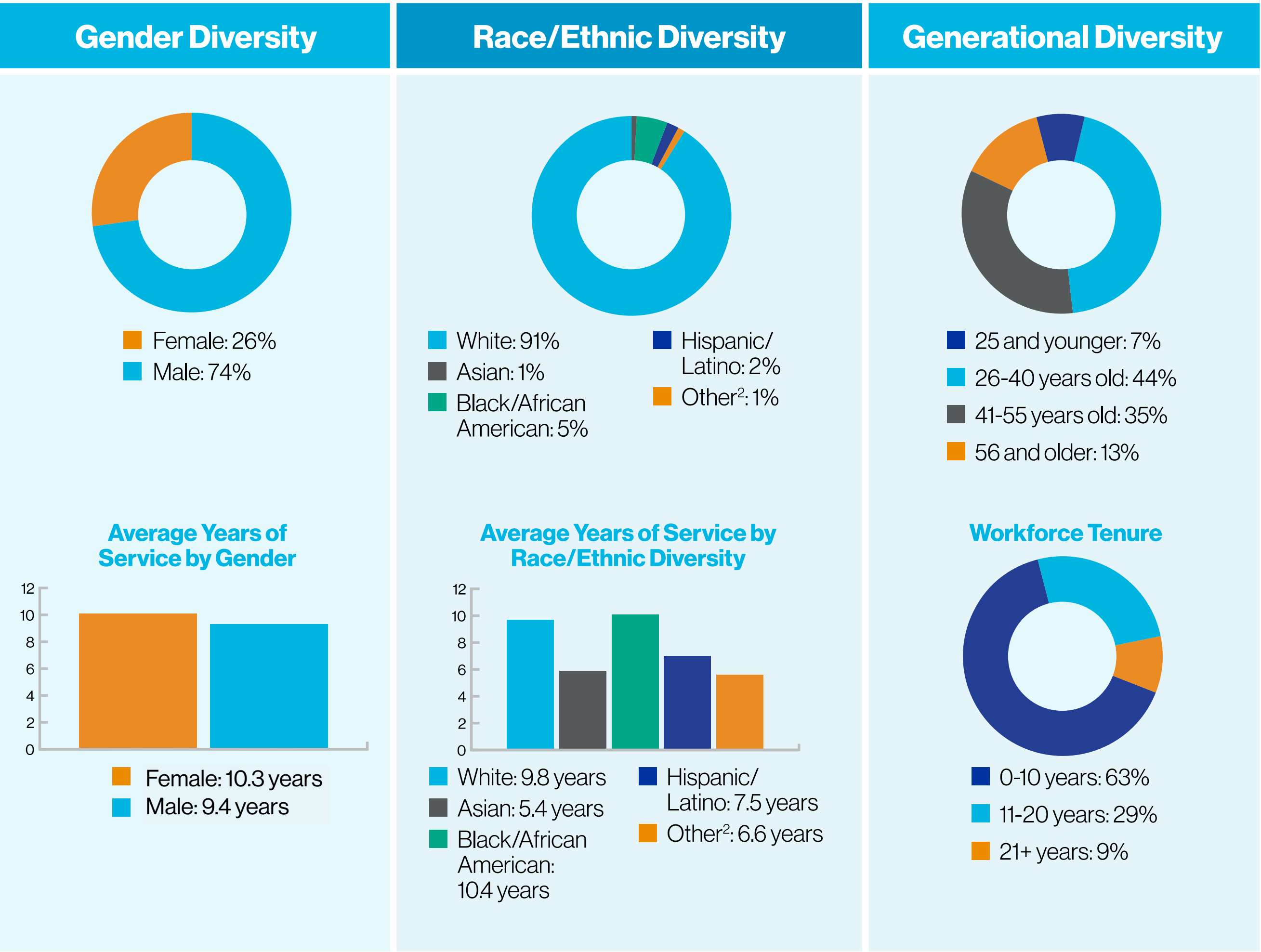


Support for Unionized Workforce

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 2025, 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 – 46% | Non-Union – 54%



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.

Policies 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.

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.
- **Culture of Respect and Valuing Differences Training:** Reinforces and reflects our core value of Integrity – one of the foundations of our culture and how we work together.

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.

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 the Company’s PrideFuel&Allies ERG, the Company submitted information for employment nondiscrimination practices, comprehensive health benefits, comprehensive health benefits guide, supporting an inclusive culture, workforce training and accountability, workforce data collection, inclusion best practices, ERGs, and outreach and engagement with the LGBTQ+ community. Since the Company began participating in the Corporate Equality Index, it has achieved steady, incremental increases each year earning a score of 80/100 in 2025.

Community Outreach Focused on Diverse Recruitment

National Fuel aims to cast a wide net for 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.

Inclusive Onboarding Experience

- **Self-Identification:** To support a sense of belonging for our employees, the Company creates opportunities for our workforce to feel seen and included. We give 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 orientation
- **Inclusive Benefits Review:** Benefit options provided to new employees include family leave options (regardless of gender) and our LGBTQ+ benefits guide.
- **Promoting ERGs:** New employees are made aware of our resource groups and how they can get involved. Groups are open to all employees regardless of demographics.

Meet Our ERG Chairs



71 Members | 33% Participation²

Darius H. *Assistant Manager*
Department: Customer Operations
Years of Service: 11
Favorite ERG Event: Member and executive mixer providing opportunity to make meaningful connections on a personal and professional level.



53 Members²

Marti S. *Senior Energy Consultant*
Department: Energy Services
Years of Service: 15
Favorite ERG Event: Winter coat/boot drive to benefit queer agencies within our service territory.



183 Members | 30% Participation²

Laura B. *Asst. General Counsel*
Department: Legal
Years of Service: 11
Favorite ERG Event: March Madness Women's brackets to benefit local community organizations supporting women and domestic violence victims.



69 Members | 64% Participation²

Matt H. *Land Coordinator II*
Department: NY Land
Years of Service: 12
Favorite ERG Event: Veteran's Day flag-raising ceremony that brings employees together to honor the men and women who have served our country.

Employee Resource Group Grant Program
The Company's ERGs fuel positive change in our communities by nominating non-profit organizations that resonate with their missions to receive grants up to \$10,000 from the Company Foundation.

Employee Resource Groups

Employee Resource Groups
National Fuel's four (4) ERGs are voluntary, employee-led groups comprised of individuals who self-identify based on specific backgrounds, interests, and/or demographic factors. 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.

United for Mental Health Awareness
In recognition of Mental Health Awareness Month, the ERGs came together to advance a shared commitment to employee wellbeing. Throughout the month, they sponsored a series of webinars and in-person events designed to foster open dialogue and equip employees with practical tools to support their mental health. As part of these efforts, we were honored to welcome Mental Health Advocates of WNY, who led an engaging and interactive session. Employees gained actionable strategies for navigating mental health-related challenges, both personally and in supporting others, and left with a deeper understanding of the importance of mental wellbeing in the workplace.



Employee Insights: The Impact of ERG Participation
Employees at all career stages shared how participation in our ERGs have shaped their professional journeys. Their perspectives highlight the value of ERGs in fostering connection, building skills, and expanding opportunities through mentorship, networking, and shared experiences.



Sami M., *Customer Service Rep.*
Customer Operations
Years of Service: 2
“My involvement in PrideFuel&Allies has given me a feeling of inclusiveness even while working in a large company. I have found like-minded coworkers that I now share a camaraderie with.”

Kathy B., *Director, EHSQ & Sustainability*
Seneca Resources, EHSQ and Stakeholder Relations
Years of Service: 22

“I have found the workshops and guest speakers to be highly valuable. Whether focusing on effective communication techniques or the importance of mental health, each session offers practical insights and takeaways that I can readily apply to my work.”



¹Self-identification of sexual orientation is only listed within our Pennsylvania application process.
²2025 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.

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. We engage local suppliers, when possible, to better support the communities that we serve. National Fuel believes in the importance of a procurement management process that is supported by honesty, integrity, and maintained in compliance with applicable legal and regulatory requirements.

Supplier Expectations

Our procurement efforts are driven by price, return on investment, timely delivery of goods and services, and other considerations that reflect our values and objectives. It is important for our suppliers to support these values and objectives, which is why suppliers are selected based on their ability to comply with National Fuel's engagement standards, which are supported by National Fuel's:

- Supplier Code of Conduct Policy
- Labor and Human Rights Policy
- Contractual Obligations
- Code of Business Conduct and Ethics
- Procurement Policy

In 2025, National Fuel helped regional economies through approximately **\$109 million** in payments to local vendors.

Reinforcing Procurement with Employees

To secure quality suppliers, National Fuel evaluates the degree of alignment between a supplier's performance and its ability to comply with National Fuel's supplier standards, which include the following considerations:

Ability to meet material specifications and applicable quality standards

Financial stability, applicable experience, and historical work performance

Willingness to comply with contractual obligations (e.g., insurance requirements, background checks, compliance with laws)

These considerations have been built into and are reinforced by the Company's procurement policy, procedures, and company-wide training, including targeted training for certain employees engaged in the procure-to-pay process.

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. National Fuel is working closely with an external cloud-based supplier management platform to streamline the Company's current vendor selection process and support our [Supplier Diversity Framework](#)¹. This framework is intended 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 considering and utilizing diverse suppliers to support our strategic sourcing of goods and services when appropriate. 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.

Recognized Diverse Supplier Certifications:

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



Black Business Market

During Black History Month, the Company's EDGEFuel ERG held its third annual Black Business Market, where employees were invited to shop and support local minority businesses at the Company's headquarters.



Supporting Diverse Local Businesses Through ERG Engagement

Our ERGs intentionally source merchandise and meeting refreshments from local, diverse-owned vendors. This approach reinforced our inclusive resourcing approach while supporting small businesses within our operating footprint.

Serving Our Community and Customers

For 125 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.

Quality Customer Service

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: 92.1%
- Pennsylvania: 89.0%

Utility Participation in Customer Outreach Events:

- Customer service teams participated in **over 250** community outreach events

Affordable Service

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

Reliable Service

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 2025 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 programs

Continued commitment towards environmental stewardship

¹Residential satisfaction rates reflect fiscal year end results.

²For New York, based on 2025 data available on company websites as required by the NYPSC. For Pennsylvania, based on analysis of 2026 PAPUC Annual Rate Comparison Report, which includes data for average monthly residential bills for 2025.

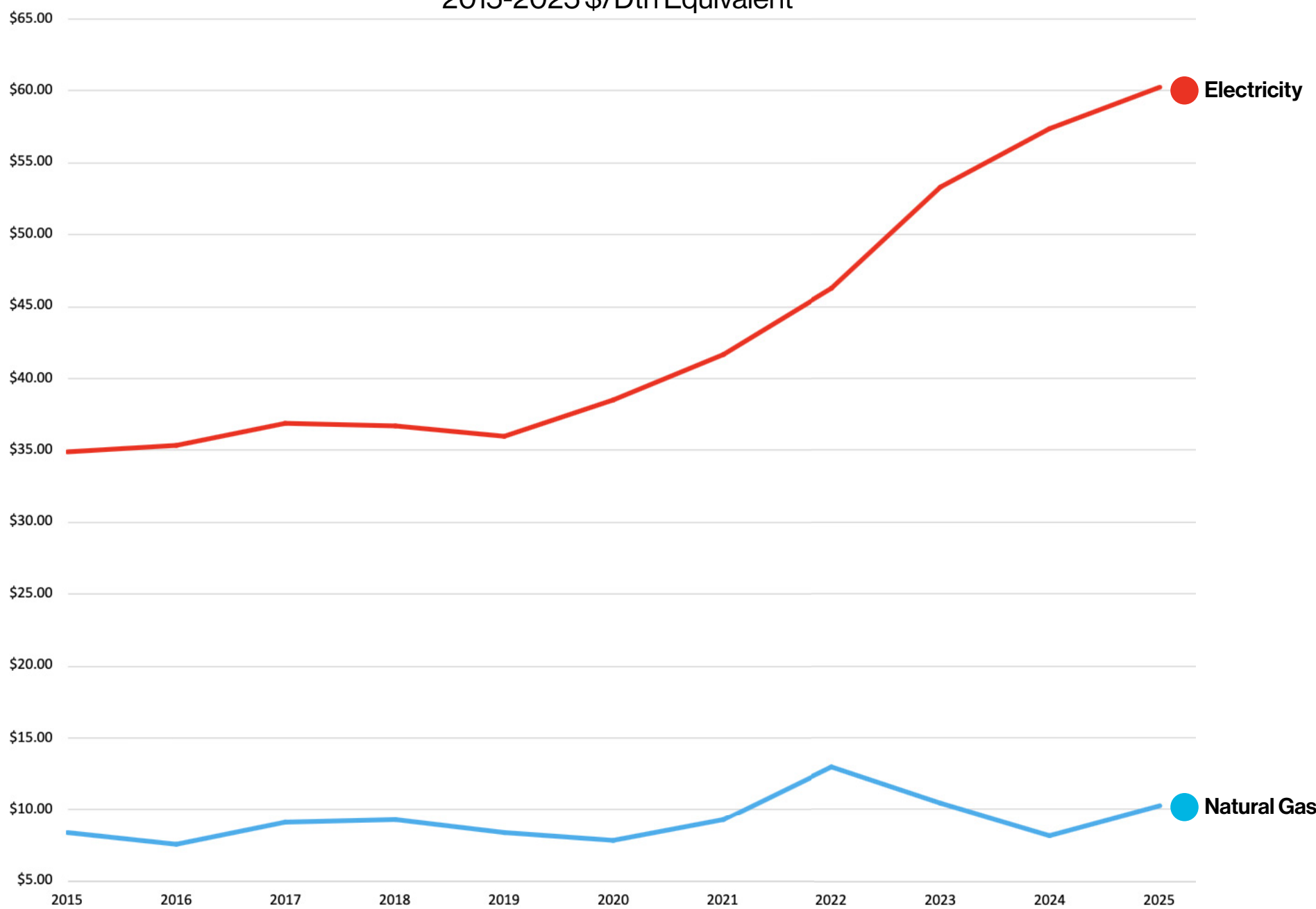
³Value is for the 12 months ended December 31, 2023 and represents the percentage of New York Distribution customers with no unscheduled outages due to the Company's error.

Energy Affordability and Reliability

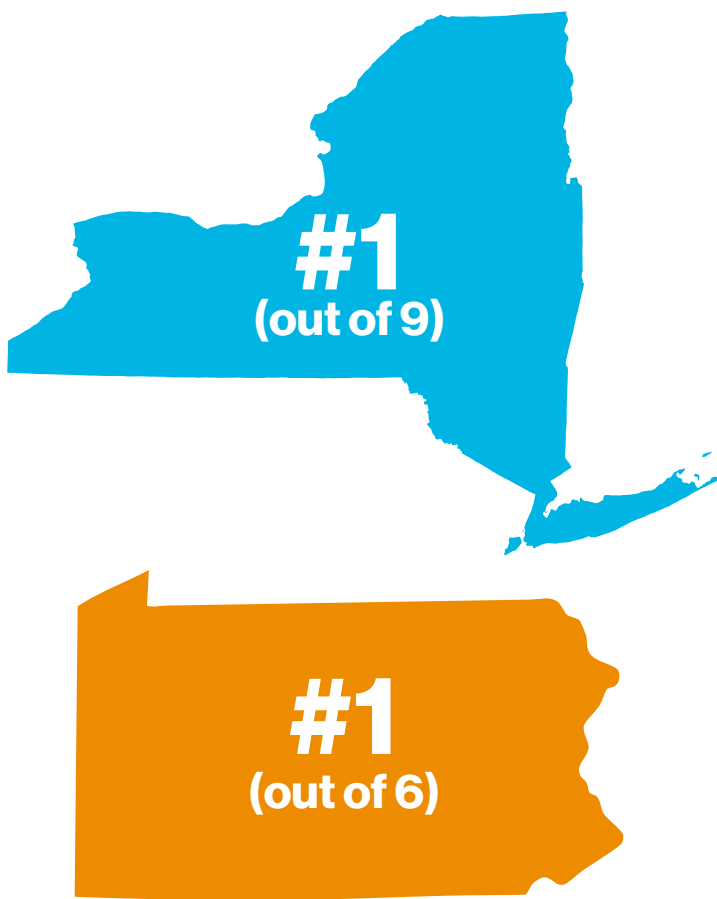
Our service areas are faced with severe weather, aging buildings, and struggling economies, making affordable and reliable energy of paramount importance to our customers. **Natural gas has been and continues to be the most affordable source of energy in our service territory – almost six (6) times cheaper than electricity.**

Affordability of Natural Gas

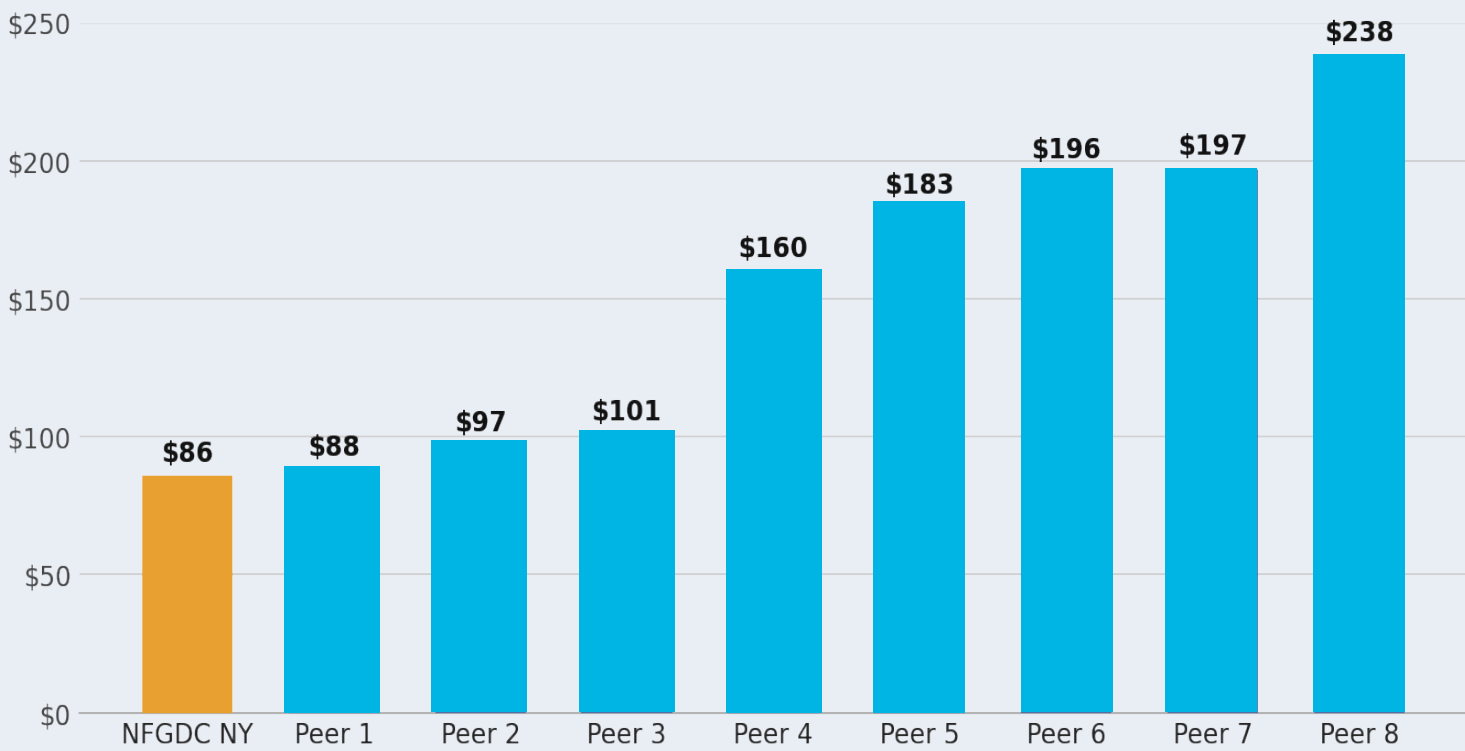
Combined Service Territory Average Residential Rates¹
2015-2025 \$/Dth Equivalent



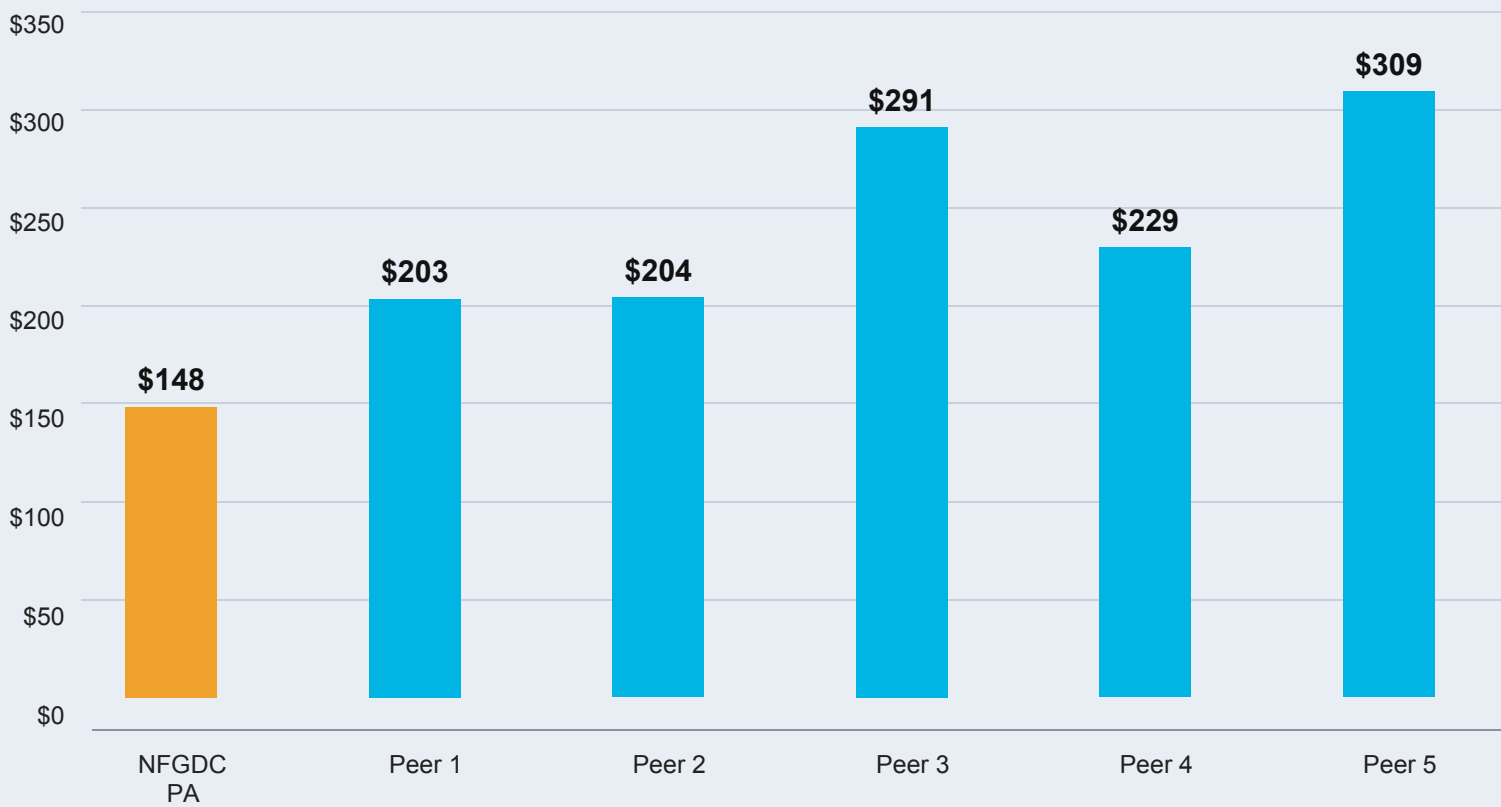
We offer our customers the **lowest gas bills** out of all the large gas utilities in New York² and Pennsylvania.³



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

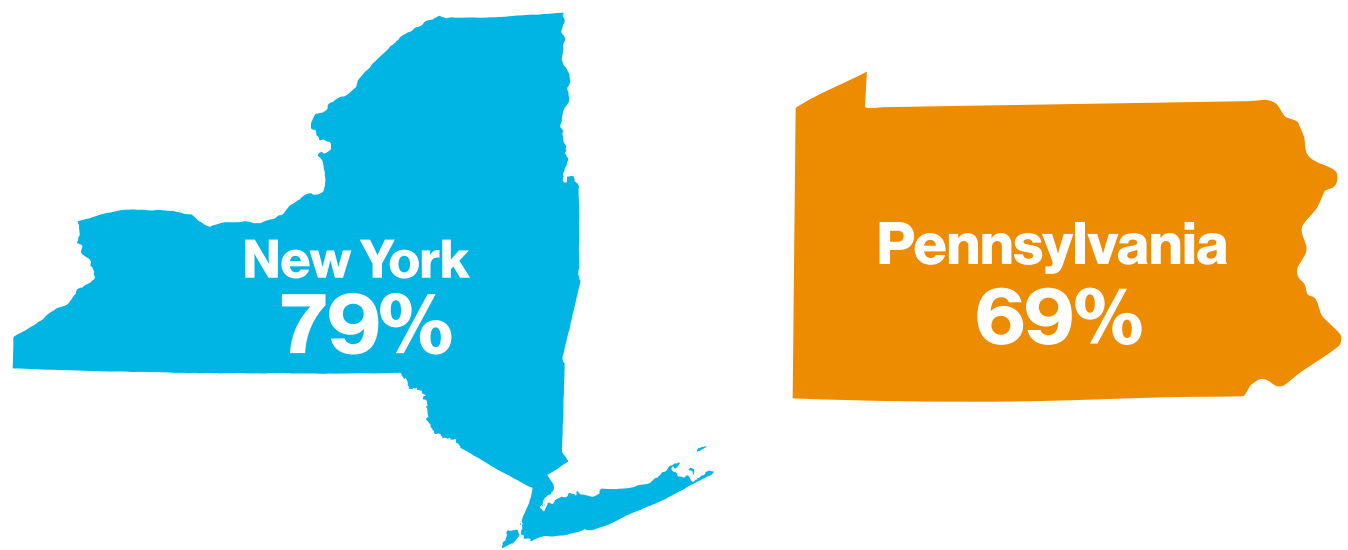


¹Average residential rates represent gas costs to customers which include the following costs, demand, commodity and a twelve-month average of delivery costs.
²Based on 2024 data available on company websites as required by the NYPSC and 100 Mcf annually.
³Based on analysis of 2025 PAPUC Annual Rate Comparison Report, which includes data for average monthly residential bills for 2025, and 15 Mcf monthly.
⁴Based on 2025 average monthly residential bill data posted on company websites required by the NYPSC.
⁵Based on analysis of April 15, 2026 PAPUC Annual Rate Comparison Report, which includes data for average monthly residential bills for 2025.

Severe Weather

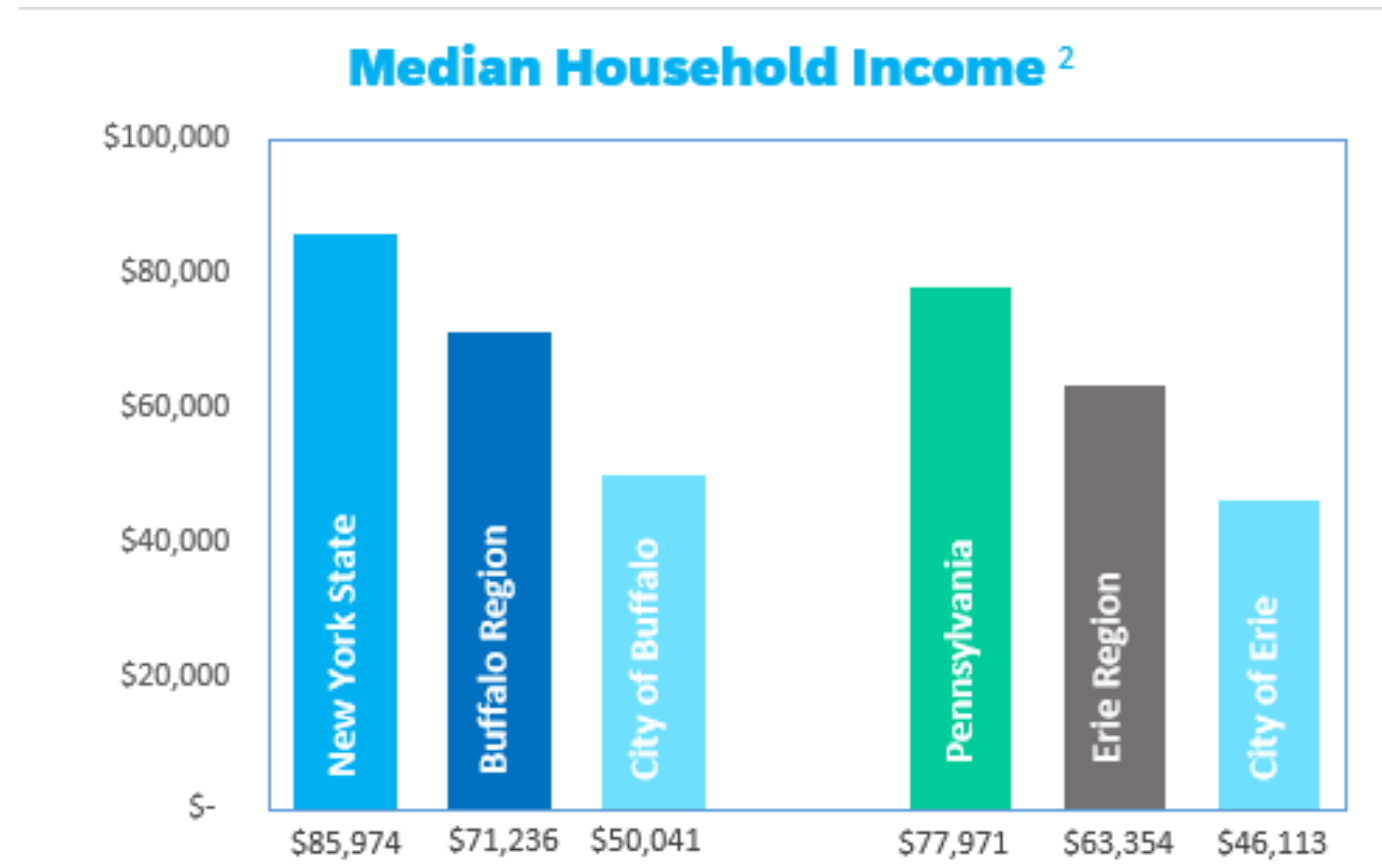
While our service territories are known for harsh winters up to 41% colder than downstate New York, our weather-hardened infrastructure offers customers a reliable and resilient heating option during extreme winter storms. These weather events can impact demand and cause market prices for energy to fluctuate across our service territory. While the wholesale price of natural gas can be volatile, 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.

Homes within Our Service Territory that use Natural Gas for Heating Purposes¹



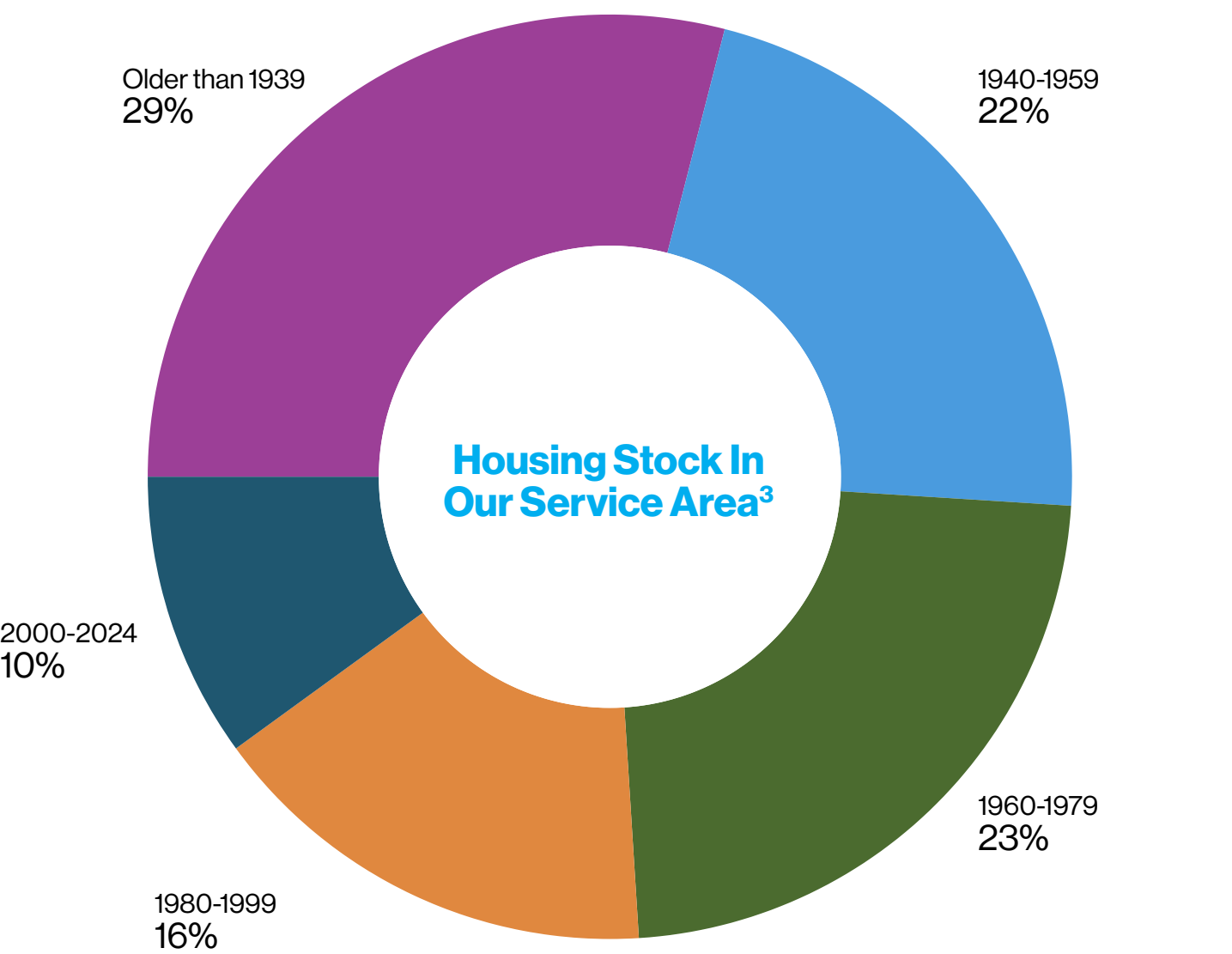
Difficult Economic Conditions

Our Utility primarily serves the Buffalo, NY and Erie, PA markets. Although these regions have 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 74% 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.



¹Based on customer profiles.
²2024 figures from the U.S. Census Bureau.
³2024 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 the 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, or negatively impact the Company’s ability to earn a fair return on investment. 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.

The Utility invested **\$77+ million in energy efficiency programs** from 2020-2025 and plans to spend \$12 million on efficiency programs in 2026.

Promoting Energy Efficiency

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.

Since 2007, National Fuel offered rebates through its energy efficiency programs to help customers upgrade aging and inefficient space and water heating equipment to high-efficiency appliances. In 2025, National Fuel was required to overhaul its Conservation Incentive Program by eliminating equipment rebates and promoting targeted weatherization incentive packages. Kicking off in 2026, as a replacement for the Company’s Conservation Incentive Program, the WeatherWise Savings Program was developed to make weatherization incentives more flexible and accessible by supporting both single-measure upgrades and comprehensive weatherization packages.

- **Outreach and Education (NY & PA):** Our outreach strategy includes a mix of digital, social, and targeted marketing channels to drive awareness in our energy efficiency and payment assistance programs. In addition to general energy efficiency program outreach efforts, National Fuel conducted educational seminars with local HVAC contractors, with the discussion focused on industry trends, policy updates, and available incentive program offerings.

- **Energy Efficiency Solutions (NY & PA):** For decades, the Company has focused on improving the lives of low- and moderate-income customers in its New York and Pennsylvania service territories by making homes more energy efficient, more comfortable, and more resilient.
 - **In New York,** eligible customers are directed and steered towards the ratepayer-funded EmPower+ Program, providing 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.
 - **In Pennsylvania,** customers that participate in the Company-coordinated Low Income Usage Reduction Program receive a free heating system safety check, an energy audit and education session, wall and/or attic insulation when appropriate, and other cost-effective energy conservation measures as warranted.
- **Hybrid Heating (NY):** From 2021 through 2025, the Company’s Conservation Incentive Program supported the installation of **more than 1,400 hybrid heating systems** across our New York service territory. Hybrid heating systems pair an air source heat pump with a traditional gas furnace to help customers transition to more efficient heating solutions. These systems effectively reduce energy consumption and reduce emissions in our local cold climate region at a lower cost compared to other full electrification options without compromising reliability and safety. Through 2025, the trend of hybrid heating system adoption reflected both customer confidence in system performance as well as the effectiveness of the program’s incentives.

Advancing and Optimizing Energy Technologies

Our Utility is committed to helping residential and non-residential customers reduce and optimize their energy usage. National Fuel accomplishes this through customer education, research and development, pilot and demonstration projects, and performing technical reviews. Examples include:

- Researching the benefits of the different hybrid heating system configurations (pairing gas-fired equipment with heat pump technology)
- Evaluating gas absorption heat pump combined heat and power, and other evolving technologies for hard-to-electrify customers
- Advancing geothermal and thermal energy technologies and policies to support advancement of low emission thermal energy network opportunities
- Collaborating with state, national, and international industry research groups to design and develop new technologies and tools that help reduce customer costs, energy usage, and emissions

Customer Gas Savings from Efficiency Measures

NY Energy Efficiency Gross Annual Savings (mmbtu)¹

	2024	2025
Residential Rebate Program	112,108	140,192
Non-Residential Rebate Program	98,079	159,220
Low-to-Moderate Income Program	24,523	39,842

Features of an Energy Efficient Home

1

Hybrid Heating System: Combination of a heat pump and a natural gas 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: Provides endless hot water on demand, heated efficiently

4

Tier Three Appliances: Represents high-efficiency household appliances

5

Smart Thermostat: Wi-Fi enabled device that optimizes heating and cooling operation to match customer needs

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

66

¹Gas savings are calculated on a gross basis consistent with the New York energy efficiency proceeding (NY 07-M-0458).

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Energy Reliability

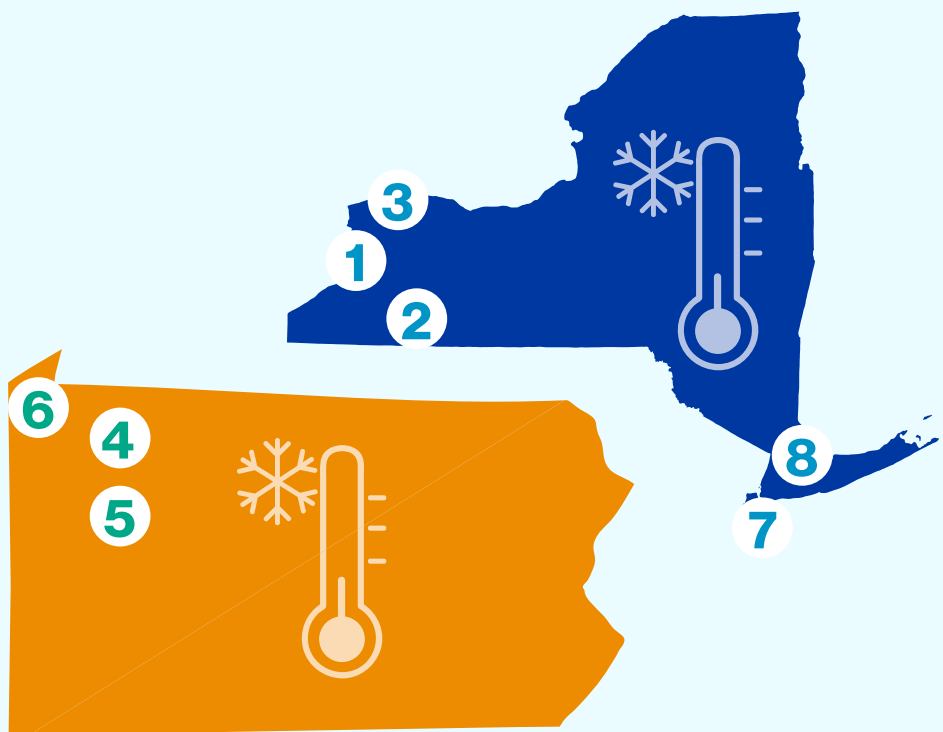
Within our Pennsylvania and New York service territories, we provide natural gas service to around 69% and 79% of households, respectively. Customers rely on us for daily necessities – including heat during our long, cold winters – and the Utility is proud to deliver near 100% service reliability.

Meanwhile, demand for electricity is growing and dispatchable resources are being retired faster than replacement supplies can come online. A recent report by the [New York Independent System Operator](#) warned, “Extreme weather quickly erodes already slim reliability margins, forcing operators to take extraordinary measures beyond traditional planning assumptions.”⁴

Maintaining reliability during this critical moment necessitates integrating flexible, dispatchable resources like natural gas that can respond to demand in real time. At National Fuel, we have consistently supported this balanced, “all-of-the-above” approach and the role natural gas plays in supporting renewables, stabilizing costs, and ensuring fuel is unquestionably there for our customers.



Colder Regions Need A Reliable Energy Source



Average Annual Minimum Temperature (°F)¹
(2000-2026 average)

Our Service Territory		Downstate NY	
1. Buffalo, NY	-2°F	7. NYC (JFK)	8°F
2. Jamestown, NY	-10°F	8. NYC (LGA)	9°F
3. Niagara Falls, NY	-4°F		
4. Bradford, PA	-12°F		
5. Dubois, PA	-5°F		
6. Erie, PA	1°F		

Number of Days per Year <= 20°F²
(2000-2026 daily average)

Our Service Territory		Downstate NY	
1. Buffalo, NY	23 days	7. NYC (JFK)	5 days
2. Jamestown, NY	29 days	8. NYC (LGA)	4 days
3. Niagara Falls, NY	23 days		
4. Bradford, PA	35 days		
5. Dubois, PA	25 days		
6. Erie, PA	16 days		

A 3-hour service interruption occurs once every nine (9) months for the average New York electric customer. By comparison, the National Fuel gas network’s 99.999% reliability means it would take more than 122 years for the average natural gas customer to experience an interruption of similar duration.⁵

¹National Oceanic and Atmospheric Administration (NOAA).
²NOAA, based on average daily temperature
³Electric data compiled from EIA report 861 based on providers within NFG’s service territory (NIMO and NYSEG in NY and PECO in PA).
⁴The report goes on to explain that sustained cold spells in recent winters have pushed New York’s system close to its limits.
⁵Electrical service interruption for New York customers was calculated using the 2025 Electric Reliability Performance Report published under NYPSC Case 26-E-0017.

Giving Back to Our Communities

National Fuel is dedicated to supporting the communities where we live and operate. We ensure our corporate philanthropy and our community involvement are both rooted in our core values.

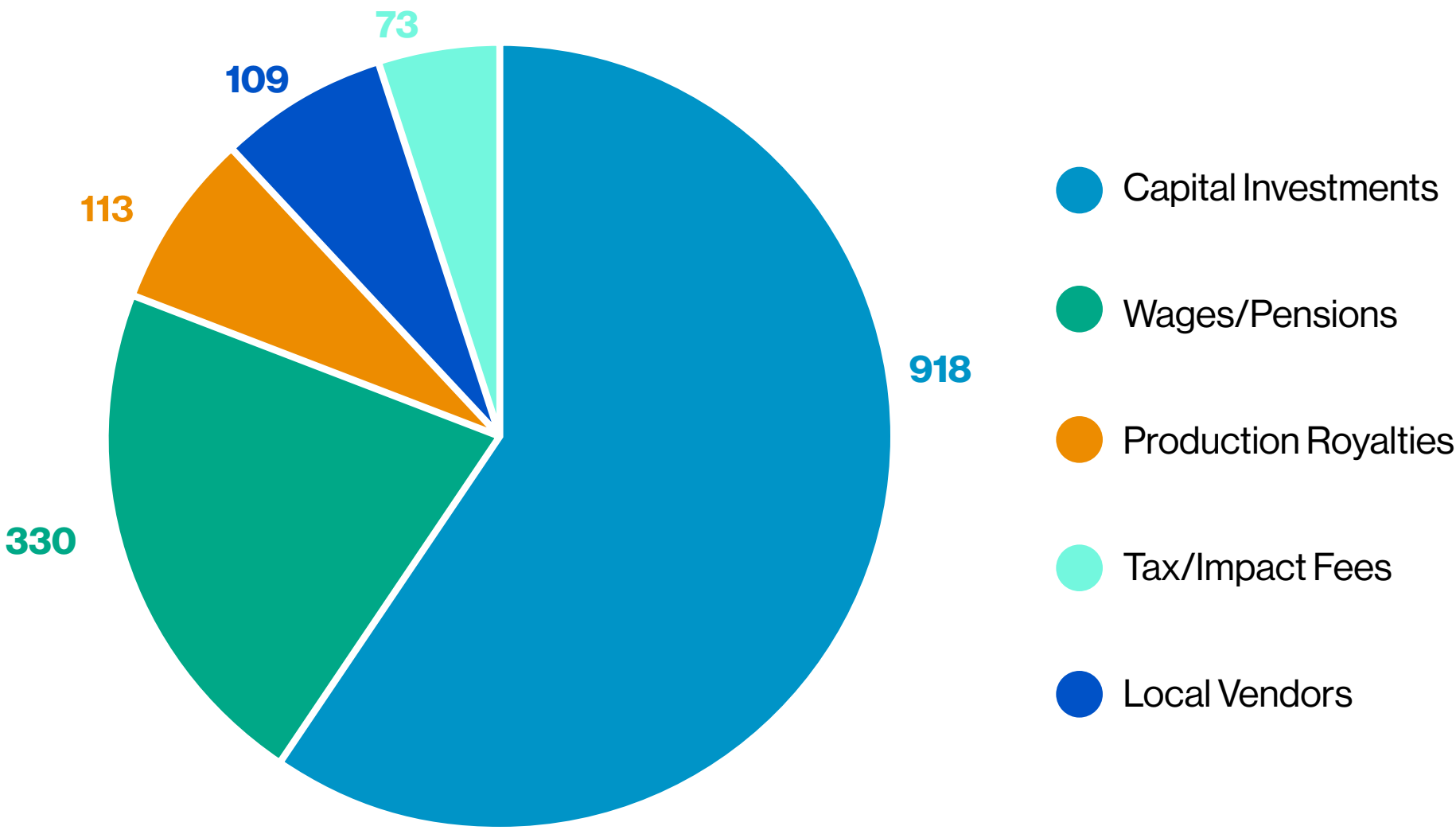
We support and expand initiatives that allow our employees to participate in community programs and volunteer locally with their coworkers, thereby strengthening their relationships with our community stakeholders.

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 core value of Commitment is embedded in our operations, ensuring that our economic activity benefits not only our business, but also makes a positive impact on the communities we serve.

Community Economic Impact (\$MM)



Focus on
Local Job Creation

Training with Local
Communities
Focused on Safety

Corporate
Philanthropy

Employee
Charitable Giving
Program



Community
Volunteer Programs

Days of Doing
Community
Service Event

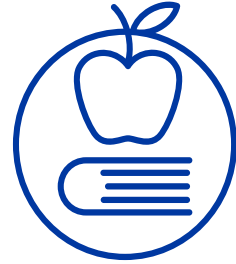
Corporate Philanthropy

In 2025, National Fuel's 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.



Veterans Services

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



Commitment

We fuel lives every day and are proud to make a positive impact where we live and work.

Charitable Giving Snapshot

Since 2005, the Company has proudly supported 1,000+ organizations through donating:

- Nearly **\$28 million** from the Foundation and National Fuel employees
- Nearly **\$3 million** through Seneca and Highland giving program

Fueling Strong Communities

Seneca's charitable giving program provides funding to eligible nonprofit organizations that are 501(c)(3)-certified. A committee of employees from various departments lead the program, meeting monthly to review funding requests and evaluate community needs. The program is guided by three (3) Pillars of Giving: **Community, Environment, and Education.**

[Seneca's 2025 Impact Report](#) highlights on how our charitable giving, employee engagement, community sponsorships, and educational outreach programs align with these pillars and support the needs of stakeholders across National Fuel's operating areas.

Advancing Community Safety Through Partnership

Each year, National Fuel's Emergency Safety Coordinators deliver specialized natural gas safety training to volunteer fire departments throughout the Company's service territory. Fire departments that complete the training are eligible to apply for funding through the Volunteer Fire Department Partnership Grant Program, which helps these departments acquire critical equipment and resources that strengthen local emergency response efforts. National Fuel is proud to support community safety in this way and to have awarded grants to six (6) participating fire departments since the program's inception.



Photo: Tyler Youschak

Our People, Our Impact

Fueling Change Through Service

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.



- Partnered with **55 organizations**
- Hosted **137 volunteer** events across New York and Pennsylvania
- More than **4,443 volunteer hours**



- Partnered with more than **40 organizations** to host **62 volunteer** events across Pennsylvania and Houston
- More than **1,100 volunteer hours**
- Hosted **12 office donation drives**, with employees donating items to support various causes

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 per calendar year.

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

>40%
employee participation

\$14.2
million contributed
since program inception
in 2005

Giving Back Together: Employee-Led Community Drives

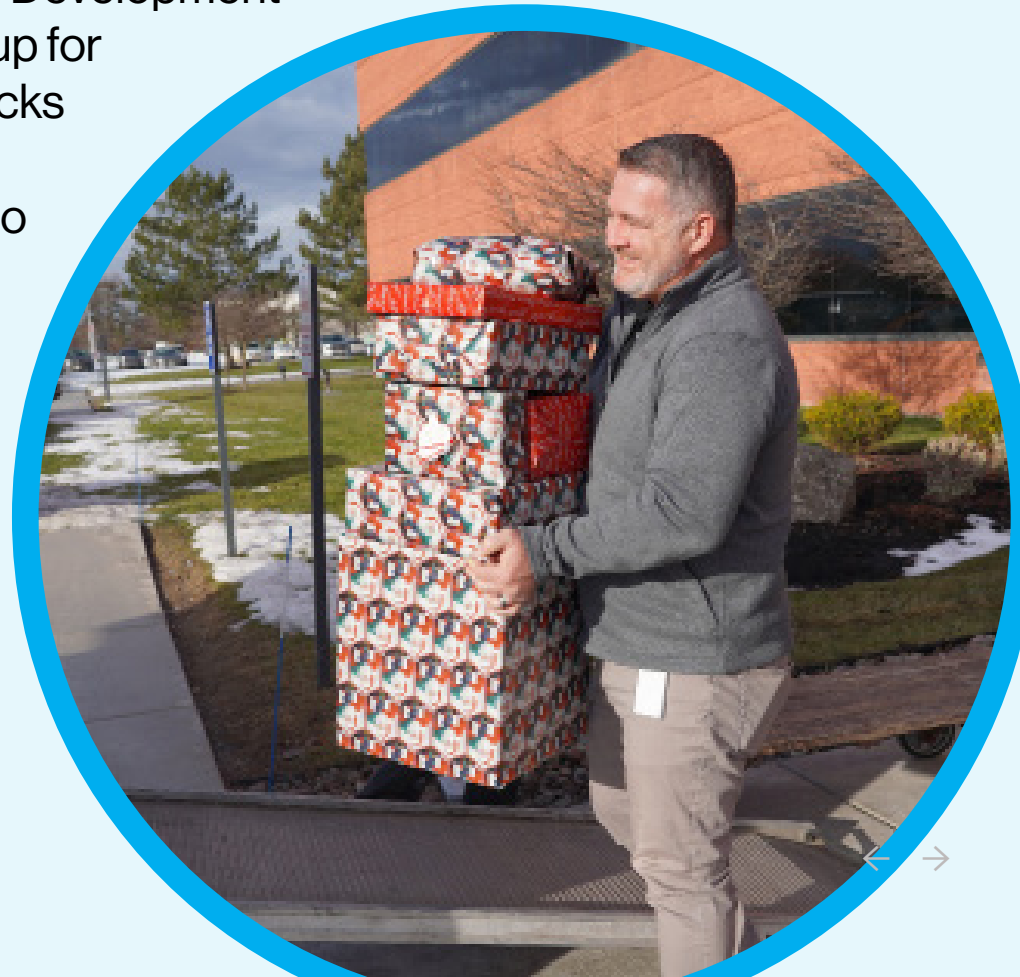
National Fuel's Faces of Fuel Volunteer Program was complemented by employee participation across a range of collection drives throughout the year across New York and Pennsylvania.

Pennsylvania: At Woodrow Wilson Middle School, where National Fuel is the corporate partner through the United Way of Erie County's community school initiative, employees contributed to a community closet drive, providing essential items such as personal hygiene products, hair care supplies and clear backpacks to help students feel confident and prepared to learn.

During the holiday season, employees also helped launch Woodrow Wilson Middle School's first-ever Giving Tree Program. Through gift donations and monetary contributions, Faces of Fuel fulfilled holiday wishes for more than 66 children. Additional donations enabled school staff to purchase gifts, ensuring that all 123 children across 40 families received support.

New York: In New York, hundreds of employees participated in a longstanding National Fuel holiday tradition of adopting families through the Veteran's One-stop Center. Each adopted family included at least one (1) veteran, and employees fulfilled holiday wish lists by purchasing gifts and essential items to help make the season brighter for 18 families.

Additionally, Faces of Fuel participated in a department-based collection initiative in Buffalo, NY, benefiting the Seneca Street Community Development Corporation (SSCDC). Internal departments signed up for designated months to gather and deliver healthy snacks and personal items for children in the organization's after-school program, supporting SSCDC's mission to create positive learning environments and address social and economic barriers for youth in the community.



Days of Doing

National Fuel's Days of Doing service event is 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 community organizations. For our fifth annual Days of Doing event, employees engaged in projects focused on spring clean-up, beautification, and building projects. Over the course of the Days of Doing, employees provided a value of approximately \$76,677.¹ To further support these initiatives, the Company's Foundation awarded grants to participating nonprofits, which reinforces the impact of our employees' volunteerism.

2,200+
Hours Volunteered

600+
Employees Participated

44
Organizations Supported

\$61,000
Grant Donations



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 Opportunitiesbusinesses, strategy, and financial planning
	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	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	2023	2024	2025
Energy Affordability	IF-GU-240a.1	Average Retail Gas Rate for:			
		Bundled Retail Sales			
		(1) Residential	\$10.70	\$9.37	\$9.40
		(2) Commercial	\$9.73	\$7.89	\$7.63
		(3) Industrial	\$9.26	\$7.17	\$7.09
		Transportation Sales			
		(1) Residential	\$4.16	\$4.77	\$4.41
		(2) Commercial	\$2.31	\$2.56	\$2.33
		(3) Industrial	\$0.88	\$0.90	\$0.80
	IF-GU-240a.3	Number of Residential Customer Gas Disconnections for Non-Payment:			
		New York Division	24,898	25,321	23,339
		Pennsylvania Division	6,981	6,635	7,711
		Percentage Reconnected within 30 days:			
		New York Division	65%	66%	59%
		Pennsylvania Division	51%	57%	58%
	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 and Reliability		
End-Use Efficiency	IF-GU-420a.2	Customer gas savings from efficiency measures by market.	See Energy Affordability - Promoting Efficiency		

Downstream Segment - Gas Utilities & Distributors (continued)

Topic	Code	Metric	2023	2024	2025
Integrity of Gas Delivery Infrastructure	IF-GU-540a.1	Number of:			
		Reportable Gas Distribution Pipeline Incidents	0	0	1
		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	0.00%	0.00%	0.00%
		Wrought Iron	1.20%	1.10%	1.00%
		Unprotected Bare Steel	9.40%	8.50%	7.60%
	IF-GU-540a.3	Percentage of Downstream Segment Transmission Pipelines Inspected:			
		Transmission Pipelines (kilometers)	106	105	105.8
		Pipelines Inspected (kilometers)	12.60	0.58	0.00
		% of Pipeline Inspected	11.90%	0.50%	0.00%
		% HCA Pipeline Inspected	27.90%	5.46% ¹	0.00%
	IF-GU-540a.4	Description of efforts to manage the integrity of gas delivery infrastructure, including risks related to safety and emissions.	See Safety Integrity and Safety		

Downstream Segment - Gas Utilities & Distributors (continued)

Topic	Code	Metric	2023	2024	2025
Activity Metrics	IF-GU-000.A	Number of Customers Served:			
		Residential	701,730	703,035	703,042
		Commerical	51,374	51,696	51,840
		Industrial	1,038	1,038	1,036
		Total	754,142	755,769	755,918
	IF-GU-000.B	Amount of Natural Gas Delivered (MMcf):			
		Bundled Retail Sales			
		Residential	59,231	57,251	67,633
		Commercial	9,147	9,108	11,244
		Industrial	535	505	625
		Total Retail	68,913	66,864	79,502
		Transportation Sales			
		Residential	5,061	4,733	5,379
		Commercial	23,313	22,229	25,311
		Industrial	33,830	34,749	38,239
		Total Transportation	62,204	61,711	68,929
	IF-GU-000.C	Total Utility Pipeline Length (kilometers):			
		Distribution Mains	23,581	23,636	23,654
		Distribution Services	12,427	12,455	12,490
		Transmission Pipelines	106	105	106
		Regulated Type B Gathering Pipelines	76	76	76
		Regulated Type R Gathering Pipelines	118	117	117
		Total Utility Pipelines	36,308	36,389	36,443

Midstream Segment - Oil and Gas: Midstream

Topic	Code	Metric	2023	2024	2025
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 - Climated-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 Enviornmental -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	38	80	10
		Acres Disturbed in Current Year	429	160	254
		Total Acres Impacted	467	240	264
		Acres Permanently Resored in Current Year	392	230	176
		Percentage of Impacted Area Permanently Restored in Current Year	84%	96%	67.0% ¹
	EM-MD-160a.4	Number and Volume of Hydrocarbon Spills:			
		Number of Spills Greater than 1 Bbl	2	0	1
		Total Volume of Spills Reported (Bbl)	8	0	1
		Total Volume of SpillsRecovered (Bbl)	8	0	1
		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

1 More construction activities have extended into the winter months, where winter stabilization is applied temporarily and permanent stabilization activities commence in Spring the following year when weather conditions are suitable for vegetative growth.

Midstream Segment - Oil and Gas: Midstream (continued)

Topic	Code	Metric	2023	2024	2025
Operational Safety, Emergency Preparedness & Response	EM-MD-540a.1	Incident and Compliance Summary			
		Reportable Onshore Gas Transmission Pipeline Incidents	0	0	1
		% Significant Onshore Gas Transmission Pipeline Incidents	0	0	100%
		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)	3,063	3,168	3,165
		Pipelines Inspected (kilometers)	162	172	461
		Percentage of Pipelines Inspected	5.28%	5.43%	14.60%
	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)	1,211,459	1,207,229	1,266,823
		Regulated Pipelines (kilometers)	3,673	3,696	3,715
		Total Pipelines (kilometers)	4,460	4,489	4,486
		Compression Horsepower	385,939	385,849	386,724

Upstream Segment - Oil & Gas: Exploration & Production

Topic	Code	Metric	2023	2024	2025
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	104,442	119,351	121,570
		Vented Emissions	96,543	78,322	36,806
		Process Emissions	1,928	1,737	1,637
		Fugitive Emissions	1,813	1,675	2,911
		Flared Hydrocarbons	393	2,211	0
	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 - Climated-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 Enviornmental - Water Management and Integrity		

Upstream Segment - Oil & Gas: Exploration & Production

Topic	Code	Metric	2023	2024	2025
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	3	2	1
		Total Volume of Non-Hydrocarbon Spills (Bbls)	1,502	18	350 ¹
		Total Volume of Non-Hydrocarbon Spills Recovered (Bbls)	Unable to estimate	18	Unable to estimate ²
		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)	4,536	4,753	4,981
		Reserves within Sites with Protected Conservation Status (Bcfe)	16	15	12
		% of Reserves within Protected Conservation	<1%	<1%	<1%
		Reserves within Areas in which Endangered Species Habitat Identified (Bcfe)	333	532	671
		% of Reserves within Areas of Endangered Species	7%	11%	13.5%
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 ; Enviornmental - 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		

1 The non-hydrocarbon spill involved a produced fluid release at a Seneca well pad. Regulatory agencies were notified upon discovery, and remediation actions were promptly implemented. The reported volume of 350 bbls is an estimate based on professional judgment.

2 Some produced fluid mixed with precipitation was recovered, however, an accurate estimate of the total volume recovered could not be calculated.

Upstream Segment - Oil & Gas: Exploration & Production

Topic	Code	Metric	2023	2024	2025
Workforce Health & Safety	EM-EP-320a.1	Total Recordable Incident Rate (TRIR) – Full-Time Employees	0.00	0.00	0.41
		TRIR – Contract Employees	0.87	0.95	0.74
		Fatality Rate – Full-Time Employees	0.00	0.00	0.00
		Fatality Rate – Contract Employees	0.00	0.00	0.08 ¹
		Near Miss Frequency Rate – Full-time and Contract Employees	10.71	9.16	5.89
		Avgerage Hours of Health, Safety & Emergency Response Training (Employees)	15.38	13.05	14.47
		Total Safety Training Hours for Contractors	5,422	4,708	4,675
		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	0.35	0.57	0.49
	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	
	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 Strong Corporate Governance Practices		
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 Risks and Climate Strategy		
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		
Activity Metrics	EM-EP-000.A	Net Gas Production (MMcf/day)	1,047.82	1,062.86	1,199.51
		Net Oil Production (MBbl/day)	0.08	0.08	0.07
	EM-EP-000.B	Number of Offshore Sites	0	0	0
	EM-EP-000.C	Number of Terrestrial Sites	1,027	1,060	1085

¹ One contractor fatality occurred in 2025. During equipment movement along a lease road, a contract crane assistant sustained fatal injuries after being struck by a hydraulic crane outrigger.

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	2023		2024		2025	
EEO-1 Job Categories	Female	Male	Female	Male	Female	Male
Administrative Support Workers	79.81%	20.19%	78.44%	21.56%	77.96%	22.04%
Craft Workers	3.07%	96.93%	3.07%	96.93%	3.05%	96.95%
Executive/Senior Level Officials	23.43%	76.57%	25.56%	74.44%	22.63%	77.37%
First/Mid-Level Officials	20.10%	79.90%	20.33%	79.67%	16.86%	83.14%
Laborers and Helpers	10.34%	89.66%	7.87%	92.13%	5.77%	94.23%
Operatives	3.07%	96.93%	3.13%	96.88%	2.98%	97.02%
Professionals	30.91%	69.09%	31.52%	68.48%	30.94%	69.06%
Technicians	10.42%	89.58%	4.44%	95.56%	4.17%	95.83%

Percentage of Racially/Ethnically Diverse Hires

2023	2024	2025
13.64%	18.18%	13.49%

Percentage of Gender Diverse Hires

2023	2024	2025
27.60%	30.30%	18.14%

Average Years of Service

Race/Ethnicity	Years
Asian	5.41
Black/African American	10.37
Hispanic/Latino	7.49
Other ¹	6.62
White	9.75

Average Years of Service

Female	Male
10.25	9.42

Racial and Ethnic Diversity ¹	2023					2024					2025				
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	0.47%	13.62%	3.76%	0.70%	81.46%	0.44%	13.78%	4.44%	1.56%	79.78%	0.95%	13.51%	4.27%	1.42%	79.86%
Craft Workers	0.00%	3.07%	1.23%	1.84%	93.87%	0.00%	2.45%	1.23%	1.84%	94.48%	0.00%	2.44%	1.22%	1.22%	95.12%
Executive/Senior Level Officials	0.57%	2.86%	1.14%	0.00%	95.43%	0.56%	2.78%	2.22%	0.00%	94.44%	0.73%	2.19%	1.46%	0.00%	95.62%
First/Mid-Level Officials	0.96%	2.39%	1.67%	0.48%	94.50%	0.71%	2.60%	1.65%	0.71%	94.33%	0.29%	3.14%	1.43%	1.43%	93.71%
Laborers and Helpers	0.00%	9.20%	4.60%	1.15%	85.06%	1.12%	13.48%	2.25%	4.49%	78.65%	0.96%	11.54%	4.81%	1.92%	80.77%
Operatives	0.34%	1.70%	1.53%	1.02%	95.40%	0.33%	1.48%	1.81%	0.99%	95.39%	0.50%	1.16%	1.98%	1.32%	95.04%
Professionals	3.38%	2.86%	2.60%	1.56%	89.61%	3.10%	3.10%	2.07%	1.81%	89.92%	2.83%	2.26%	2.26%	1.13%	91.51%
Technicians	0.00%	2.08%	0.00%	0.00%	97.92%	0.00%	2.22%	0.00%	0.00%	97.78%	0.00%	2.08%	0.00%	0.00%	97.92%

1 Other includes the following classifications: Native American or Alaska Native, Native Hawaiian or Pacific Islander, and two or more races.

Appendix D: Workforce Safety Data

Total Number of Hours Worked¹

		2023	2024	2025
Downstream	Employee	2,679,162	2,802,904	2,794,265
Midstream	Employee	916,122	939,606	934,435
Upstream	Employee	471,124	474,986	487,382
	Contractor	2,310,432	2,102,491	2,433,001

OSHA Total Recordable Incident Rate (TRIR)²

		2023	2024	2025
Downstream	Employee	3.28	3.35	2.65
Midstream	Employee	1.31	3.41	1.93
Upstream	Employee	0.00	0.00	0.41
	Contractor	0.87	0.95	0.74

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

		2023	2024	2025
Downstream	Employee	2.39	2.07	1.43
Midstream	Employee	0.87	1.49	0.86
Upstream	Employee	0.00	0.00	0.00
	Contractor	0.35	0.57	0.49

Fatality Rate

		2023	2024	2025
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	0.08 ³

Near Miss Frequency Rate (NMFR)³

		2023	2024 ⁴	2025
Downstream	Employee	0.90	1.43	0.93
Midstream	Employee	3.51	3.19	1.50
Upstream	Employee & Contractor	10.71	9.16	5.89

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

2 All values restated to CY.

3 One contractor fatality occurred in 2025. During equipment movement along a lease road, a contract crane assistant sustained fatal injuries after being struck by a hydraulic crane outrigger.

4 As a result of the Company's continuous improvement process, the Downstream and Midstream segments discovered a need update the criteria for near miss categorizations in 2025. Data for 2024 was reviewed and revised accordingly.

Appendix E: Consolidated Data Tables

This appendix provides a consolidated view of our corporate responsibility metrics for calendar years 2023, 2024, and 2025. The consolidated metrics for calendar year 2025 were affected by EPA's GHGRP amendments, effective January 1, 2025; metrics for calendar years 2023 and 2024 predate these amendments, and are unaffected except as otherwise noted in this appendix. 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)	2023	2024	2025
Utility (NY & PA)			
EPA Mandatory Reporting	232,258	217,491	78,019
Additional EPA Facilities	973	941	1,185
Other Sources	94,416	95,080	95,224
Total Utility	327,647	313,512	174,428

Scope 1 Methane (CH ₄) Emissions (Metric Tons as CO ₂ e)	2023	2024	2025
Utility (NY & PA)			
EPA Mandatory Reporting	231,961	217,222	77,897
Additional EPA Facilities	973	941	1,185
Other Sources	85,610	86,172	86,590
Total Utility	318,544	304,335	165,672

Scope 2 Emissions (Metric Tons CO ₂ e)	2023	2024	2025
Utility (NY & PA)	949	992	979

Scopes 1 & 2 Emissions Intensity (kg CO ₂ e/BOE)	2023	2024	2025
Utility (NY & PA)			
Methane Emissions Intensity	13.1	12.34	6.57
Greenhouse Gas Emissions Intensity	13.6	12.75	6.96

Downstream and Midstream Segments Waste Summary	2023	2024	2025
Solid Waste (MT) – Hazardous			
Incineration	6.13	7.20	9.62
Landfill	0.24	0.06	0.09
Reuse/Recovery	—	0.27	0.00
Recycled	1.34	1.05	1.05
Total Hazardous	7.71	8.58	10.76
Solid Waste (MT) – Non-Hazardous			
Incineration	6.02	6.35	37.16
Landfill	1,106.74	2,865.32	1,619.92
Reuse/Recovery	4.83	0.00	181.01
Recycled	3,978.07	955.15	1,538.16
Total Non-Hazardous	5,095.66	3,826.82	3,376.25
Total Solid Waste	5,103.37	3835.40	3,387.02
Liquid Waste (Bbls) – Hazardous			
Incineration	230.38	173.00	198.52
Landfill	—	—	9.17
Reuse/Recovery	2.62	—	0.00
Recycled	—	—	0.00
Total Hazardous	233.00	173.00	207.69
Liquid Waste (Bbls) – Non-Hazardous			
Incineration	950.43	990.61	1,157.83
Injection Well ²	N/A	2,960.00	N/A
Landfill	126.12	91.19	244.17
Reuse/Recovery ³	31,096.63	33,333.48	91,847.90
Recycled ²	1,141.48	870.24	4,635.28
Water Treatment - Disposal	3,949.71	0.00	0.00
Total Non-Hazardous	37,264.36	38,245.52	97,885.18
Total Liquid Waste ¹	37,497.36	38,418.52	98,092.87

1 Total Liquid Waste does not include produced water
2 2025 data reflects transfer of emissions from the 'Injection Well' category to the 'Reuse/Recovery' category in connection with a recycling opportunity the Company explored involving hydrostatic test water.
3 2025 data reflects an increase in operations, including Midstream segment expansion projects.

Midstream Segment

Scope 1 Greenhouse Gas Emissions (Metric Tons CO ₂ e)	2023	2024	2025
Empire			
EPA Mandatory Reporting ¹	109,570	104,150	98,956
Additional EPA Sources	972	833	8,328
Other Sources	7,482	7,482	0
Total Empire	118,025	112,466	107,284
Supply Corporation ²			
EPA Mandatory Reporting	246,145	216,791	316,856
Additional EPA Sources ³	147,407	158,515	157,142
Other Sources	11,856	7,983	3,306
Total Supply Corporation	405,408	383,289	477,303
Midstream Company ³			
EPA Mandatory Reporting	547,731	499,704	567,164
Additional EPA Sources	0	0	0
Other Sources	768	727	728
Total Midstream Company	548,499	500,431	567,893
Midstream Segment			
EPA Mandatory Reporting ¹	903,446	820,646	982,976
Additional EPA Sources	148,380	159,348	165,470
Other Sources	20,106	16,192	4,034
Total Midstream Segment	1,071,931	996,186	1,152,480

Scope 1 Methane (CH ₄) Emissions (Metric Tons as CO ₂ e)	2023	2024	2025
Empire			
EPA Mandatory Reporting	5,225	4,607	10,017
Additional EPA Sources	798	587	8,166
Other Sources	7,475	7,475	0
Total Empire	13,498	12,669	18,183
Supply Corporation			
EPA Mandatory Reporting	94,454	81,928	174,746
Additional EPA Sources	104,817	109,270	99,223
Other Sources	8,943	5,036	175
Total Supply Corporation	208,214	196,235	274,143
Midstream Company			
EPA Mandatory Reporting	137,782	107,117	134,983
Additional EPA Sources	0	0	0
Other Sources	564	563	563
Total Midstream Company	138,346	107,680	135,546
Midstream Segment			
EPA Mandatory Reporting	237,461	196,653	319,745
Additional EPA Sources	105,615	109,857	107,389
Other Sources	16,982	13,074	738
Total Midstream Segment	360,057	319,584	427,872

1 2023 and 2024 values are updated due to discovery of fuel meters at facilities previously unaccounted for.
2 2023 and 2024 values are updated to reflect the utilization of portable flaring as a methane reduction method during blowdown venting events.
3 2023 and 2024 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)	2023	2024	2025
Empire	564	536	1,025
Supply Corporation	4,067	3,383	3,133
Midstream Company	770	677	775
Total Midstream Segment	5,401	4,596	4,932

Scopes 1 & 2 Emissions Intensity (kg CO ₂ e/BOE)	2023	2024	2025
Pipeline & Storage (Supply Corporation and Empire)			
Methane Emissions Intensity	1.79	1.72	2.32
Greenhouse Gas Emissions Intensity	4.26	4.11	4.68
Gathering (Midstream Company)			
Methane Emissions Intensity	1.77	1.35	1.59
Greenhouse Gas Emissions Intensity	7.03	6.30	6.68
Total Midstream Segment			
Methane Emissions Intensity	1.78	1.57	2.03
Greenhouse Gas Emissions Intensity	5.33	4.98	5.48

Air Emissions (Metric Tons CO ₂ e)	2023	2024	2025
Empire			
NO _x	28	25	23
SO _x	4	4	3
VOC	5	6	5
PM	2	2	2
Supply Corporation			
NO _x	333	299	296
SO _x	3	3	3
VOC	206	148	179
PM	13	11	11
Midstream Company			
NO _x	355	322	291
SO _x	3	3	3
VOC	102	103	64
PM	16	16	19
Total Midstream Segment			
NO _x	716	646	611
SO _x	10	9	9
VOC	313	257	248
PM	31	29	32

Upstream Segment

Scope 1 Greenhouse Gas Emissions (Metric Tons CO ₂ e)	2023	2024	2025
Seneca			
EPA Mandatory Reporting	186,710	152,675	136,413
Additional EPA Facilities	0	0	0
Other Sources	18,409	50,621	26,511
Total Seneca	205,119	203,296	162,924
Highland Field Services (HFS)			
EPA Mandatory Reporting	0	0	0
Additional EPA Facilities	0	0	0
Other Sources	11,807	7,637	4,833
Total HFS	11,807	7,637	4,833

Scope 1 Methane (CH ₄) Emissions (Metric Tons as CO ₂ e)	2023	2024	2025
Seneca			
EPA Subpart W Mandatory Reporting	99,034	61,417	40,925
Additional EPA Subpart W Facilities	0	0	0
Other Sources	396	22,687	127
Total Seneca	99,430	84,104	41,052
Highland Field Services (HFS)			
EPA Mandatory Reporting	0	0	0
Additional EPA Facilities	0	0	0
Other Sources	9	5	4
Total HFS	9	5	4

Scope 2 Emissions (Metric Tons CO ₂ e)	2023	2024	2025
Seneca	546	672	759
HFS	1,151	693	690

Scopes 1 & 2 Emissions Intensity (kg CO ₂ e/BOE)	2023	2024	2025
Seneca			
Methane Emissions Intensity	1.39	1.14	0.5
Greenhouse Gas Emissions Intensity	2.87	2.78	1.99
NGSI Intensity %			
Seneca			
Methane Emissions Intensity - NGSI	0.044%	0.037%	0.016%

Seneca Production Data	2023	2024	2025
Production (MBOE)	71,775	73,723	82,191

Upstream Segment (continued)

Air Emissions (Metric Tons CO ₂ e)	2023	2024	2025
Seneca			
NO _x	313.22	310.98	419.48
SO _x	0.72	0.73	2.02
VOC	53.63	53.25	48.08
PM ₁₀	12.23	10.98	12.97
HFS			
NO _x	36.94	18.86	9.82
SO _x	9.17	4.12	2.82
VOC	15.74	12.14	10.29
PM ₁₀	3.05	1.31	0.75
All Non-Hazardous Waste ³	2023	2024	2025
Liquid Waste (Bbls)			
Injection	864	2,091	200
Landfilled	0	0	0
Recycled	444	3,175	0
Reuse/Recovery	362,325	448,309	459,011
Total	363,633	453,575	459,211
Solid Waste (Metric Tons)			
Injection	0	0	0
Landfilled	81,888	69,572	71,798
Recycled	25	104	49
Reuse/Recovery	27	0	0
Total	81,940	69,676	71,847

Freshwater Withdrawn and Freshwater Consumed (Thousands of Cubic Meters) ¹	2023	2024	2025
Total Water Withdrawn	1,564	1,255	1097
% of Water from Locations with High or Extremely High Water Risk	0%	0%	0%
Total Freshwater Consumed	1,070	1,055	1,133
% 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	2023	2024	2025
Produced Water and Flowback	1,811	1,672	1,828
% Discharged	0%	0%	0%
% Injected for Disposal	8.0%	3.6%	0.4%
% Recycled	92.0%	96.4%	99.6%

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: GRI Standards by Topic

Topic	GRI- Referenced Codes
Company Overview	2-1; 2-2
Governance	
Board Diversity and Independence	2-9; 2-10; 2-11
Investment Community Engagement	2-12; 2-29
Strong Corporate Governance Practices	2-15; 2-16; 2-23
Governance – Political Advocacy	2-28
Governance of Corporate Responsibility and Sustainability	2-9; 2-12; 2-13; 2-14
Management of Climate-Related Risks and Climate Strategy	2-22; 2-27
Environmental	
Greenhouse Gas Emissions and Air Quality	305-1; 305-2, 305-4, 305-5, 305-7
Ecological Impacts and Biodiversity Protection	304-1, 304-3
Water Management and Integrity	303-1; 303-3;
Waste Management	306-5
Project Planning and Development	2-29
Safety	
Employee and Contractor Safety	403-5; 403-9
Compliance, Training and Development	404-1
Social	
Employee Attraction and Retention	401-2; 401-3
Employee Demographics	401-1
Building an Inclusive Workplace	2-30
Serving Communities	413-1



Appendix G:

Independent

Third-Party Verification

of Emissions Data



VERIFICATION STATEMENTS FOR NATIONAL FUEL UPSTREAM, MIDSTREAM, AND DOWNSTREAM REPORTING FOR REPORTING YEAR 2023, 2024, AND 2025

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 2023, 2024, and 2025 reporting year emissions for their Upstream, Midstream, and Downstream reporting segment processes.

The National Fuel limited 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 2023, 2024, and 2025 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 limited 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 2023, 2024, and 2025 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 2023, 2024, and 2025 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.

Tetra Tech, Inc.
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The verification body has found the submitted emissions reports free of material misstatement. In addition, the verification body also attests that the National Fuel reports conform to the requirements of the regulation.

Certified by:


Erica Alvarado, D.Env., M.P.H.
CARB, OR DEQ, and Ecology Accredited Greenhouse Gas Lead Verifier with Oil & Gas and Transactions Specialties

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