

The following policies are applicable to and shall be adhered to by each vendor providing goods or services to Southwestern Energy Company or its affiliates.

As used herein, "Company" is a reference to the SWN affiliate made a party to the agreement with the vendor. "Contractor" is a reference to the contractor providing goods or services to Company. "Work" is a reference to the performance of services and the provision of goods in connection with the services by Contractor for Company.

DRUGS, DEADLY WEAPONS AND SEARCHES

Contractor shall abide by and help enforce among its employees the following Company policy regarding drugs, deadly weapons and alcohol:

- a. Using, possessing, or being under the influence of alcoholic beverages, illegal drugs, narcotics, or other controlled substances, and unauthorized drugs for which a person does not have a current prescription, while on Company's Work Site, is prohibited. Possession of deadly weapons or explosives while on Company's Work Site is prohibited.
- b. The term "Company's Work Site" is used in its broadest sense to include all Work locations, buildings, structures and all other facilities owned or controlled by Company or one of its Affiliates or otherwise being utilized for Company's business.
- c. To ensure compliance with this policy, Company may conduct unannounced periodic inspections of all individuals and their personal effects while on Company's Work Site.
- d. Violation of the Company policy or refusal to submit to an inspection will be cause for immediate removal from Company's Work Site.

U.S. DEPARTMENT OF TRANSPORTATION ("D.O.T.") REGULATIONS

Contractor shall, at its own cost, comply with all applicable Department of Transportation ("D.O.T.") regulations regarding drug testing of its employees and agents, and of its subcontractors' employees and agents, who perform operation, maintenance and emergency response functions at regulated pipeline facilities or as truck drivers, if required by 49 C.F.R. Parts 40, 192, 193, 195, 199, 391 and 394. Contractor shall comply with Company's requirements for verifying compliance with the current and any future applicable D.O.T. regulations.

NON-DISCRIMINATION IN EMPLOYMENT

During the performance of Work for the Company, Contractor agrees to comply with federal, state and local laws, rules and regulations applicable to Contractor's operations hereunder, and the non-discrimination and affirmative action provisions of Executive Orders 11246, 11375, 11141, 11598 and 11758, all as amended, and Section 503 of the Rehabilitation Act of 1973 and Section 402 of the Vietnam Era Veterans Readjustment

Act of 1974, together with all pertinent regulations issued thereunder, which Acts and Orders are fully incorporated herein by reference.

HARASSMENT

Company policy prohibits harassment on any basis including sex, race, national origin, ethnicity, religion, disability, age, or color. Harassment includes unwelcome sexual advances, requests for sexual favors, and any other verbal or physical conduct of a sexual nature or any other insulting, ridiculing, offensive or intimidating conduct, whenever such conduct interferes with an employee's work performance or creates an intimidating, hostile, or offensive working environment. Contractor shall ensure that any subcontractors and its and their employees abide by this policy. Any individual who engages in harassment is subject to immediate removal from Company's Work Site.

MINORITY/WOMAN-OWNED BUSINESSES

It is the policy of Company to take positive action toward ensuring equal opportunity in the conduct of all its business activities. Accordingly, Contractor agrees to use its best efforts to include woman-owned and minority-owned suppliers and subcontractors on its bidder lists and where appropriate, in the awards of purchase orders and subcontracts.

CONFLICT OF INTEREST

Contractor shall make all reasonable efforts to prevent occurrences of and eliminate conditions which could result in a conflict with the best interest of Company. Contractor shall make all reasonable efforts to prevent conflicts of interest from arising out of relationships between agents or employees of Contractor and agents or employees of Company. Contractor's efforts shall include the establishment of measures to prevent Contractor's agents and employees from giving or receiving gifts or entertainment, other than business or seasonal gifts of nominal value and entertainment of moderate value, assuming a legitimate business purpose is being served, or making any payments, loans or other consideration for the purpose of procuring business or inducing any person to act contrary to the best interest of Company. Contractor will document expenses for gifts, entertainment or other amenities provided to Company's agents, representatives and employees. Contractor shall immediately contact Company's Legal Department in the event any employee or agent of Company intentionally or inadvertently creates a situation or circumstance that could result in a potential conflict of interest.