



**ANTERO RESOURCES CORPORATION  
SUPPLIER CODE OF BUSINESS CONDUCT AND ETHICS  
(Adopted as of December 15, 2020)**

**I. Purpose and Principles**

This Supplier Code of Business Conduct and Ethics (the “*Code*”) sets the standard of conduct for the suppliers, contractors, independent consultants and other third parties (each a “*Supplier*”) working with and on behalf of Antero Resources Corporation and its subsidiaries (the “*Company*” or “*Antero*”). While this Code covers many matters, it is not intended to be all-inclusive or to address every situation. Suppliers should follow the following principles in order to help the Company maintain its high standard of business conduct:

- Always comply with this Code, the law and other applicable Company policies, using good judgment, common sense and the highest standards of ethical conduct.
- Treat all individuals, including Company employees, customers and partners, in an honest and fair manner.
- Disclose activities, financial interests or relationships that may be or may appear to be a conflict of interest, and obtain prior written approval where appropriate.
- Create an environment where individuals feel they can voice their concerns.
- Safeguard and properly use Company proprietary and confidential information, personal information, and other Company assets and resources, as well as those of the Company’s customers and partners.
- Report suspected unethical or illegal behavior to the Company’s Human Resources Department or Antero’s anonymous ethics hotline at (888) 244-9141.
- Always ask any questions or raise a good faith concern you have about possible violations of laws, this Code or any other applicable Company policies. See Section VI of this Code.
- Cooperate with Company personnel conducting investigations.

The Company may take prompt action against anyone who violates this Code, which may include disciplinary actions, termination of employment or termination of any other business relationship or transactions. The Company may in its sole discretion, but is under no obligation and expressly disclaims any duty to, monitor Suppliers’ compliance with this Code. The Company reserves the right to request that Suppliers affirm their compliance with this Code from time to time, to subject new or continued engagement to compliance with this Code or to otherwise require that Suppliers

make available information confirming their compliance with this Code, however, the Company may also opt not to engage in such activities.

## **II. Acting Ethically**

- A. ***Treat all individuals fairly and with respect.*** The Company values employee diversity and equal opportunity for all. Each Supplier must not tolerate in any aspect of the employment relationship any discrimination or harassment based on race, color, religion, age, sex, gender, gender identity, sexual orientation, national origin, ancestry, disability, veteran status, marital status, or on any other basis protected by federal, state, or local law, ordinance or regulation.
- B. ***Preserve the safety of the workspace.*** The Company believes that preserving the health and safety of employees and others working in its workspaces is essential, and each Supplier is expected to provide individuals with a workplace free of physical hazards, violence, harsh and inhumane treatment, harassment and abuse, mental or physical coercion or the threat of any such treatment. If physical hazards cannot be adequately controlled, Suppliers are expected to provide employees with appropriate personal protective equipment and training. Suppliers are expected to have safety programs for managing and maintaining the safety of their products and processes. Suppliers must identify and assess likely and potential emergency situations in the workplace and minimize their impact by implementing emergency plans and response procedures. Suppliers are expected to implement good security practices across their operations.
- C. ***Protect human rights.*** Antero opposes the use of all forms of child labor, forced or compulsory labor, and human trafficking. The Company will not tolerate these practices at our operations and expects Suppliers to demonstrate a similar intolerance for such practices. All applicable laws in these areas must be complied with. For purposes of this policy, “forced or compulsory” labor includes such labor as defined by the International Labour Organization (“ILO”) Convention 29 on Forced Labor and ILO Convention 105 on the Abolition of Forced Labour, as well as any labor exacted by an employer through the use of coercion, including physical violence, corporal punishment, sexual abuse, or debt bondage. For the purposes of this policy, “child” labor includes such labor as is prohibited by ILO Convention 138 on Minimum Age and ILO Convention 182 on the Worst Forms of Child Labour.
- D. ***Freedom of Association.*** Suppliers must respect the rights of individuals to exercise their lawful rights of free association, including joining or electing not to join any association in accordance with applicable law.
- E. ***Provide individuals with fair and competitive compensation.*** Employees are expected to be paid a wage meeting or exceeding the minimum wage and overtime rates required by law and any applicable collective labor agreements. Where no such laws or agreements apply, wages are expected to be in line with applicable marketplace practices. Antero prohibits discrimination in remuneration on any basis covered under Section II(A) above.

- F. ***Avoid conflicts of interest.*** Conflicts of interest usually occur when an individual's personal interests interfere (or appear to interfere) with the interests of the Company, either directly or indirectly. Suppliers, their employees and their family members should not receive improper benefits or payments through their relationship with the Company or allow other activities to conflict with acting in the best interests of the Company.

### **III. Protecting Our Business**

- A. ***Protect Company assets.*** Suppliers are expected to use Company resources only for legitimate business purposes consistent with their relationship with the Company. Personal or other inappropriate uses of Company resources are prohibited. Company resources include the Company's intellectual property, confidential information, and other assets of the Company. Confidential information includes all non-public information that Suppliers are provided access to during their engagement with the Company, including any non-public information of the Company's customers, partners and other suppliers. The Company reserves the right to monitor, search, and image, and control access to any Company information system, device, resource, or infrastructure.
- B. ***Use personal information appropriately.*** Suppliers must also comply with applicable laws, regulations and guidance concerning use of "Personal Information," including Antero's Protection of Personal Information Policy, Privacy Notice and Acceptable Use Policy, and maintain the confidentiality and security of any Company Personal Information. "Personal Information" includes personally identifiable information, non-public personal information, personal data and any other similar terms defined by applicable data protection or privacy laws.
- C. ***Keep the Company's information safe.*** Suppliers are expected to safeguard and implement commercially reasonable, industry-standard controls to prevent unauthorized access to and disclosure of Company information, including confidential information, intellectual property, and Personal Information of the Company and its employees, customers, partners and other suppliers.

### **IV. Dealing with Customers and Third Parties**

- A. ***Conduct business in the right way.*** Suppliers are expected to prohibit the making of oral or written misrepresentations or dishonest or misleading statements to anyone. Suppliers' books and records must always accurately and fairly reflect all transactions with the Company, and all documentation submitted to the Company must be complete, accurate, timely and appropriately authorized. All competitive information and business opportunities must be obtained lawfully and consistent with the Company's policies on gathering such information. Fraud, dishonesty, unethical or criminal conduct on the part of any Supplier or anyone doing business with the Company will not be tolerated.
- B. ***Avoid inappropriate gifts and entertainment.*** Suppliers are expected not to offer to or receive from any Company employee gifts, fees, favors, entertainment or any other kind of personal benefit intended to influence, or that might reasonably appear to influence, a

business decision. This provision does not prohibit reasonable business entertainment or transportation in keeping with Antero's Code of Business Conduct, which includes, a lunch, dinner or occasional athletic or cultural event (provided such business entertainment is not lavish, frequent, or in excess of generally accepted practices and does not involve inappropriate activities, e.g., adult entertainment) or gifts of nominal value (\$50 or less) per source per calendar year. If you are offered a gift worth more than \$50 and believe that it would genuinely cause offense to refuse it, particularly outside the United States, please contact Antero's Chief Compliance Officer for advice as to how to proceed.

- C. ***Never bribe or offer inducements.*** Suppliers are expected not to practice or tolerate any form of corruption, extortion or embezzlement. Suppliers also must not offer or accept bribes or other unlawful incentives to or from their business partners.

## V. **Important Laws and Regulations**

- A. ***Comply with applicable laws, rules and regulations.*** Suppliers are required to comply with both the letter and spirit of all laws, rules, regulations and regulatory guidance that would be applicable to the Company if the Company were providing the goods and services, including those laws, rules and regulations addressing environmental, health and safety matters, and corruption, kickbacks, bribery and other prohibited business practices. Suppliers are expected to promote the safe and environmentally sound development, manufacturing, transport, use and disposal of their products.
- B. ***Never use inside information to trade Company stock.*** Material, non-public information, or MNPI, is a form of confidential information that includes all non-public information that may have a significant impact on the price of a security or other financial instrument, or that a reasonable investor would likely consider important in making an investment or voting decision. Buying or selling securities, or encouraging others to do so, while in possession of MNPI is illegal. Suppliers must prohibit trading in the Company's securities until any MNPI in the possession of the persons engaged in the trade, or those recommending the trade, has been publicly disclosed and disseminated.
- C. ***Compete fairly at all times.*** Suppliers must comply with all laws that promote competition and avoid business activities or conduct that would unlawfully restrict competition. When performing services for the Company, Suppliers must be careful to avoid inappropriately sharing Company confidential information or third party confidential information to gain a marketplace advantage, or engaging in discussions with employees of competitors within trade associations, standard setting bodies or other industry organizations regarding costs, prices, terms of sale, territories, competitive bids or customers.

## VI. **Health, Safety and Protection of the Environment.**

Suppliers and contractors must conduct business in compliance with applicable health, safety, and environmental laws, rules, regulations; including Company work practices and policies. Suppliers are expected to share our commitment to Zero Incidents, Zero Harm, and Zero Compromise.

Suppliers must provide a healthy and safe work environment and take all practicable steps to prevent incidents and injuries. Occupational hazards and injuries must be documented and necessary measures must be taken to prevent accidents from re-occurring. Suppliers must ensure that all of their respective employees, contractors and sub-contractors, are provided with necessary instructions, training and personal protective equipment necessary for facilitating safe work methods. Suppliers must work to reduce impacts to the environment by using natural resources and energy efficiently, reducing emissions and releases to the environment, and minimizing waste at the source, and when generated, handle waste in accordance with applicable laws, rules, and regulations.

## **VII. Reporting Concerns.**

Suppliers have an obligation to ask questions and report good faith concerns about possible violations of this Code, Company policies and applicable laws and regulations. In addition, any concerns relating to ethical or business conduct matters, should be brought to the Company's attention. Suppliers may make any such reports anonymously and confidentially by contacting the Company's ethics hotline at (888) 244-9141 or at <https://login.redflagreporting.com/Antero/> or may make any such reports directly by contacting the Company's Chief Compliance Officer at (303) 357-7310. Suppliers should also adopt policies and procedures to encourage internal reporting of ethical concerns and concerns about possible violations of this Code, Company or Supplier policies, and applicable laws and regulations.

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*This document states a policy of Antero Resources Corporation and is not intended to be regarded as the rendering of legal advice.*