

## **SM ENERGY COMPANY**

### **HUMAN RIGHTS POLICY**

SM Energy Company is committed to compliance with applicable laws, rules and regulations; conducting our business with honesty, integrity and high ethical standards; and prioritizing exceptional safety, health and environmental stewardship in our operations. Upholding this commitment includes operating in a manner that is respectful of human rights in all respects, including through the prohibition of child labor, forced labor and discrimination in the workplace. While we recognize that federal and state authorities have the primary responsibility for protecting human rights and ensuring the rights of indigenous peoples, in the conduct of our business we strive to advance human rights and make positive contributions in the communities where we work and operate.

We recognize the dignity of all human beings and embrace the inalienable rights of all people to live their lives free from discrimination and abuse. We respect the human, cultural and legal rights of all individuals and communities. This commitment extends to the fair treatment of all people, including indigenous people, regardless of race, color, gender, gender identity, national origin, religion, sexual orientation or income level.

#### **I. General Statement of Policy.**

It is our policy to avoid causing or contributing to adverse human rights impacts and address such impacts when they may occur in our activities. This Policy applies to SM Energy employees, officers, and directors, who are expected to use good business judgment and address known adverse human rights impacts in the conduct of our business.

#### **II. Requirements and Prohibitions.**

The following statements reflect our specific philosophies in the conduct of our business, but are not intended to limit the general statement above.

- 1) All persons are entitled to the same human rights and dignity, without discrimination of any kind.
- 2) All persons are entitled to the right to a remedy and equal protection under the law if their human rights are violated.
- 3) No person shall be subjected to cruel, inhumane, or degrading treatment or punishment.
- 4) We will prohibit child labor and the use of forced or compulsory labor in the conduct of our business.
- 5) We are committed to diversity and provide equal employment opportunities to all employees and job applicants regardless of age, race, sex, color, religion, national origin, disability, military status, sexual orientation, genetic information, or any other status protected by applicable state or local law.

- 6) We will not tolerate any form of harassment, discrimination, or threatening, hostile or intimidating behavior, whether verbal, written or physical conduct.
- 7) We support the professional development and success of our employees, and desire to foster an environment in which every employee thrives in all aspects of their lives.
- 8) We support performance-based compensation that meets or exceeds the legal minimum wage and provides an adequate standard of living.
- 9) We support the right of our employees to work in a safe and healthy environment through the implementation of appropriate health, safety and environmental programs.

In addition, our Code of Business Conduct and Conflict of Interest Policy ([click here](#)) sets forth additional principles for everyone who works at our company, which further describes our commitments and responsibilities to each other, our customers, our shareholders, those with whom we do business and the communities in which we operate.

We engage with our stakeholders, including our employees, contractors, suppliers, service providers, shareholders and community members to work together to have a positive impact wherever we operate and to uphold our corporate responsibilities. We strive to make meaningful contributions to the communities, our industry, and to our society.

ADOPTED effective May 28, 2021.