Operating with Integrity

Rooted in our core values and industry-best management practices, our strong governance programs provide clear guidelines to define ethical behavior at every level.

Core Values	**Code of Conduct & Policies**	**Accountability Checks**
Uphold a culture of responsibility	Define expectations	Measure assurance

Setting Clear Expectations

Each Chesapeake director, officer and employee, regardless of position, must abide by Chesapeake's Code of Business Conduct (the "Code"), which is structured around our five core values. To help employees understand expectations around the Code, we regularly host training sessions, and all new employees learn about the Code during their onboarding process. Senior management also communicates with employees about the Code and related policies during company meetings.

Beyond enterprise-wide Code training, Chesapeake organizes specialized compliance training sessions tailored to certain employees' job functions and work types.

These sessions offer targeted guidance on important topics such as conflicts of interest, business gifts and entertainment, and anti-corruption and fair competition.

Each year all employees must sign a Code certification confirming they have reviewed the Code and related policies, understand the high standards expected of them and will report actual or potential ethics concerns or Code violations.

Our Code references a number of policies that further guide employee behavior on more in-depth issues. These documents are available on our intranet, providing employees with a central, easily accessible location for reviewing current policies.

CHESAPEAKE
ENERGY

ESG-Related Policies

- Anti-Corruption Policy
- Antitrust Policy and Compliance Manual
- Conflicts of Interest Policy
- Drug and Alcohol Policy
- Equal Employment Opportunity Policy
- Gifts and Entertainment Policy
- Human Rights Policy
- Information Security Policy
- Insider Trading Policy
- Non-Retaliation Policy
- Protection of Chesapeake Assets Policy
- Social Media and External Communication Policy
- Supplier Code of Conduct
- Vehicle Use Policy
- Zero Tolerance Anti-Harassment, Anti-Discrimination and No Violence in the Workplace Policy

Ethics Helpline

We encourage and expect employees to report conduct that may be unethical, illegal or in violation of the Code. Accordingly, we expect managers to create an environment where employees feel comfortable reporting concerns.

We also offer the Chesapeake Ethics and Integrity Helpline, an anonymous, third-party confidential hotline and secure website. True to our culture, Chesapeake does not tolerate retaliation against anyone who raises issues in good faith.

All reports of unethical business conduct are investigated and reported to appropriate levels of management and, as appropriate, the Board's Audit Committee. Corrective actions are taken when necessary.