

PDC Energy

Human Rights Policy

PDC Energy, Inc. (“PDC Energy” or “we”) is committed to upholding the highest degree of honesty, integrity, and ethical standards throughout the business we conduct in the communities where we work and live. PDC Energy prioritizes the health, safety, and environmental stewardship of our operations while respecting the human rights of our stakeholders, communities, and workforce. Respect for human rights is also reflected in our Harassment Awareness Policy, Code of Business Conduct and Ethics and how we interact with our peers and our stakeholders.

General Statement of Policy

It is PDC Energy’s goal to avoid any causality or contribution to adverse impacts on human rights as well as address and mitigate such impacts if/when they may occur through our operations. This policy is applicable to all of our locations, job sites and to all employees as well as contractors, service providers, business partners and suppliers. PDC Energy expects all individuals to exercise sound business judgement and address human rights impacts they are aware of.

Our dedication to honesty, integrity, and respect for our people, environment, and communities are reflected in our:

- Code of Business Conduct and Ethics;
- Company values;
- Rigorous vetting and onboarding practices for contractors and suppliers, which includes the assessment of legal compliance, environmental and safety policies and procedures, safety track records, and safety reputations;
- Robust emergency response and safety trainings for both employees and contractors with online systems to ensure compliance;
- Routine vetting of contractors to ensure minimum lawful requirements and applicable safety policies are being met;
- Continuous efforts to consult landowners and impacted stakeholders throughout project development and execution; and
- Operating procedures to track and address stakeholder grievances in a timely manner.

Labor Practices

PDC Energy is invested in providing a diverse, inclusive, respectful and safe work environment which is free from all forms of discrimination, harassment and violence. We are committed to promoting diversity and providing equal employment opportunities to all, regardless of age, sex, race, color, religion, national origin, disability, sexual orientation, or any other status protected under applicable law. PDC Energy also recognizes and respects the principles set forth in the International Labor Organization’s Declaration of Fundamental Principles and Rights at Work, such as freedom of association and prohibitions on forced labor and child labor.

Our commitment to human rights is demonstrated by:

- Supporting the rights of our employees and contractors to work in a safe environment through our relevant health, safety, and environmental requirements and oversight;
- Ensuring anyone working on our locations is legally authorized to do so;
- The right to issue stop work orders to anyone on PDC Energy locations;
- Promoting a respectful workplace, by having a zero-tolerance policy for any form of harassment, including sexual harassment, discrimination or hostile behavior;
- Prohibiting child labor and the use of forced or compulsory labor within our business;
- Ensuring all individuals are entitled to their right for remedy and equal protection under the law if their human rights are violated;
- Protecting and promoting gender equality.

As noted above, our Code of Business Conduct and Ethics and other various policies outlined above, located in our Policy & Procedure Manual provides additional principles and policies for both our employees and contractors and further outlines how PDC Energy approaches and mitigates the impacts of our operations and strives for excellence in environmental and social stewardship.

Throughout our operations, we engage with our stakeholders, including employees, contractors, suppliers, shareholders, landowners, and community members to ensure we are contributing to a positive impact in the communities in which we live and work.

PDC Energy recognizes the need for routine and ongoing impact assessments to assess human rights risk regarding the scope of our operations, products and services. PDC Energy acknowledges risks may change and vary over time due to many different variables within our operational scope.

PDC Energy will require all employees to comply with this policy and related policies and will work to ensure our contractors and other business partners understand and acknowledge their role in upholding this policy.