

TABLE OF CONTENTS

1. STATEMENT OF PURPOSE.....2

2. COMMITMENT STATEMENT2

3. DIVERSITY AND INCLUSION3

4. CODE OF BUSINESS CONDUCT AND ETHICS3

5. HEALTH, SAFETY, AND ENVIRONMENTAL POLICY4

6. VOLUNTARY INTERNATIONAL INITIATIVES.....4

7. LABOR POLICY.....5

8. COMMUNITY ENGAGEMENT AND SOCIAL DEVELOPMENT.....7

9. APPROVALS8

UNCONTROLLED DOCUMENT

1. STATEMENT OF PURPOSE

This Pioneer Natural Resources USA, Inc. (PNR) Commitment expresses our position on human rights issues and is intended to supplement our Human Rights Policy.

This document will be reviewed regularly, or every **3yr**, to ensure content and terms are current and representative of corporate and industry best practices.

This document does not supersede any federal, state, or local laws or regulations.

In case of conflict between documents, notify PNR and clarification will be issued.

2. COMMITMENT STATEMENT

PNR has committed to being a responsible corporate citizen and force for good, advocating for progress on environmental, sustainability, and social inclusion in addition to equality within our communities, industries, and societies at large.

As part of this commitment, PNR recognizes the dignity of all human beings and embraces the inalienable rights for all people to live free from all forms of discrimination or abuse.

PNR conducts all aspects of business in accordance with our RESPECT core values, which serve as the cultural foundation of our company and our commitment to human rights.

The acronym for RESPECT is outlined below.

R	Respect	We respect one another and the communities in which we operate.
E	Ethics and Honesty	We are ethical and honest and committed to upholding our strong reputation.
S	Safety and Environment	We believe no job is so important that it cannot be done in a safe and environmentally sound manner.
P	Personal Accountability	We are disciplined and personally accountable for our decisions, actions, attitudes, and results.
E	Entrepreneurship	We have an entrepreneur’s mindset, driving innovation and striving for excellence in all we do.
C	Communication	We openly and professionally communicate among all levels and between departments and teams.
T	Teamwork and Inclusion	We believe in diverse perspectives and teams collaborating toward common objectives with a can-do attitude.

UNCONTROLLED DOCUMENT

3. DIVERSITY AND INCLUSION

PNR is committed to creating an inclusive environment where all Employees feel respected, valued, and connected to the business. PNR strives to be a workplace where individuals are authentic and successful in achieving goals. An inclusive workplace enables us to embrace the diverse backgrounds and perspectives of Employees and attract the best talent.

As part of this commitment, PNR has created our One Pioneer diversity and inclusion program that includes a vibrant Employee Resource Group, championing our culture of RESPECT and community stewardship.

Principles of our One Pioneer Employee Resource Group are outlined below.

- We listen, show up, and speak up as allies for people and communities different from our own.
- We believe in an accessible and inclusive workplace that supports Employees with permanent and temporary disabilities.
- We embolden our Employees to be their authentic selves at work regardless of sexual orientation, gender identity, or gender expression.
- We advocate for the recruitment, development, and support of military personnel and families.
- We appreciate and celebrate individuals from all cultural backgrounds and foster a culture of inclusion through promoting a constructive understanding of our differences and potential biases.
- We connect Employees through mentorship, networking, and shared learning to adapt and succeed at every stage of careers in a rapidly changing workplace.
- We promote equality through the development, retention, and advancement of women and people of color at PNR.

4. CODE OF BUSINESS CONDUCT AND ETHICS

The commitment PNR makes to human rights and engaging with those who may be impacted by our business is also reflected in our Code of Business Conduct and Ethics (the Code). PNR cares how business results are obtained and not the fact of obtainment.

The Code states that PNR will tolerate nothing less than honesty, fair dealing and sound business ethics, and expresses the standards of integrity and business conduct that every PNR Employee, Contractor, Supplier, Officer, and Director must uphold.

Additionally, follow PNR standard master service agreements contractually obligate its Contractors and Suppliers to comply with the Code as well.

This commitment to maintaining a culture that promotes honesty and integrity includes the prevention, detection, and resolution of unethical and unlawful conduct. PNR Employees, Contractors, Suppliers, Officers, and Directors have an obligation to report concerns or conduct that may violate the Code and may do so without fear of retaliation or retribution from PNR.

5. HEALTH, SAFETY, AND ENVIRONMENTAL POLICY

The PNR Health, Safety, and Environmental Policy (HSE Policy) illustrates how PNR conducts its business with respect for people and the environment, accountability to local authorities in the communities in which we live and operate, and the manner in which we collaborate and engage with our stakeholders and others who may be impacted by our operations.

As stated in the HSE Policy, PNR is committed to protecting our Employees - and those who work in or live near our areas of operations - from injury, health risks, or damage to the environment.

This HSE policy provides that PNR will identify and manage HSE risks and impacts through business decisions, plans, and operations by creating a focus on environmental stewardship and a proactive and predictive network of systems to ensure federal, state, and local regulatory compliance. Consequently, at-risk behaviors and/or conditions will be addressed promptly, HSE incidents and/or compliance concerns will be addressed and reported in a timely manner, required HSE training will be successfully completed, and PNR HSE Best Practices and regulatory requirements will be met or exceeded.

6. VOLUNTARY INTERNATIONAL INITIATIVES

PNR adheres to the laws in the United States and recognizes the importance of international voluntary initiatives aimed at promoting and protecting the fundamental human rights of all people.

PNR believes businesses have a constructive role to play to advance respect for human rights. PNR operations are limited to a single basin the United States, and as such are subject to robust federal, state, and local laws and regulations governing the employment, working conditions, and safety and environmental aspects of our business. At the same time, we recognize the importance of the human rights philosophies expressed in the global frameworks described below.

- We operate our business consistent with the [Universal Declaration of Human Rights](#), which declares specific principles affirming freedom, equality, and opportunity for all individuals and the duty to protect these basic human rights and freedoms of others.
- PNR business practices also follow key aspects of the [United Nations Guiding Principles on Business and Human Rights](#), which places the responsibility on businesses, in addition to the states, to respect the human rights of others and to address adverse human rights impacts.
- Further, PNR respects the principles articulated in the [International Labour Organization Declaration on Fundamental Principles and Rights at Work](#), which addresses the link between social progress and economic growth.
- Congruent with the core principles mentioned above, PNR also values the principles articulated in the [United Nations Declaration on the Rights of Indigenous Peoples](#) and the [International Labour Organization Convention 169](#) concerning inherent protections granted to indigenous and tribal peoples.

PNR is developing training for Employees to enhance compliance with these international initiatives. By the end of 2023, PNR commits to have trained **100%** of its Employees on human rights and will conduct refresher training at regular intervals¹ thereafter.

In the event potential human rights concerns resulting from our operations are identified by PNR or the communities in which we operate, PNR will take specific actions to manage and mitigate such risk.

7. LABOR POLICY

Concurrent with the Code, which illustrates the positive, culture inclusive and highly ethical standards at PNR, the Equal Employment Opportunity Policy (EEO) of PNR provides equal employment opportunity for all qualified Employees and applicants without regard to aspects outlined below.

• Age	• Other legally protected status
• Color	• Pregnancy
• Disability	• Race
• Gender Identity	• Religion
• Genetic Information	• Sex
• Marital Status	• Sexual Orientation
• National Origin	• Veteran Status

This obligation applies to all employment practices including, but not limited to, those listed below.

- Recruiting, hiring, promoting, transferring, demoting, laying off, terminating, and training
- Treatment during employment
- Rates of pay or other forms of compensation and benefits
- Selection for training including apprenticeship and on-the-job training, as applicable
- Social and recreational activities or programs

In addition, PNR does not and will not discriminate against any Employee or Applicant for employment on any of the aforementioned factors in regard to any position for which the Employee or Applicant for employment is qualified.

PNR Chief Executive Officer, Rich Dealy, has committed to and fully supports the principles of equal employment opportunity.

The objective at PNR is to employ individuals who are qualified or trainable for positions by virtue of job-related standards of education, training, experience and other applicable and valid qualifications. PNR makes and will continue to make every effort to provide reasonable accommodations to any physical and mental limitation of individuals with disabilities and disabled veterans unless such accommodations would impose an undue hardship to PNR business.

¹ Intended to be annual unless data indicates effectiveness would be served on a more frequent or less frequent basis.

Harassment is both illegal and against the policy of PNR for any Employee, Supervisor, Manager or Independent Contractor to harass anyone on the basis of aspects outlined below.

• Age	• Other legally protected status
• Color	• Pregnancy
• Disability	• Race
• Gender Identity	• Religion
• Genetic Information	• Sex
• Marital Status	• Sexual Orientation
• National Origin	• Veteran Status

7.1. Setting the proper tone by leaders

Ensuring compliance and continued implementation of PNR EEOP, anti-harassment, and other policies is the responsibility and priority of our Chief Executive Officer and the other members of our Management Committee.

Workplace safety is also a high priority initiative for PNR, as evidenced in the Code and PNR HSE Policy. PNR strictly enforces the safety aspects of these policies and routinely promotes the importance of safety in the oil and gas field as well as the office environment. Each day, field Employees begin with a safety meeting, including vehicle checks, and each meeting begins with a ‘safety moment’. The Code states the goal of PNR is to conduct its operations in a manner that protects the safety of Employees, others involved in its operations, and the public.

Accident prevention is everyone’s responsibility and PNR Employees each have a responsibility not to endanger themselves or others. PNR Employees must learn the relevant, job-specific safety procedures and not begin or continue with any work activity contrary to those procedures. Any PNR employee uncertain of the safety procedures relevant to an operation must seek out a Supervisor and be trained in those procedures before beginning the operation. In addition, PNR Employees must use safety equipment as required by law, regulation and PNR Best Practices.

Further, as the Code mandates, PNR will not tolerate threats or acts of violent behavior against co-workers, Vendors, Customers or others while conducting Company business, at Company-sponsored functions, in or out of the workplace, or at any time. Any PNR Employee who becomes aware of a threat or act of violent behavior (including by a third party) that has affected or may affect a PNR facility or the people at or near the facility must immediately notify their Supervisor of the details of the act or threat. Supervisors who receive such a notification must immediately notify PNR Corporate Security Department or Human Resources Department. Nothing in this Code prevents or discourages a report being made directly to any regulatory body or law enforcement agency. As evidence of our commitment to workplace safety, PNR has conducted additional training courses such as active shooter training.

UNCONTROLLED DOCUMENT

8. COMMUNITY ENGAGEMENT AND SOCIAL DEVELOPMENT

PNR policies emphasize proactive stakeholder engagement, social risk and impact management, and strategic social investments that provide both direct and indirect benefits to the communities where we operate.

PNR headquarters have been in the Dallas area since 1997, and PNR and its predecessor companies have been operating in the Midland basin since the 1950s.

We strive to model the importance of becoming a force for good in our local communities and can proudly say that we have a true culture of giving within the company. PNR routinely demonstrates its strong commitment to the community through donations, fundraising initiatives, a generous Employee donation match program, and the coordination and support of Employee volunteerism.

We have partnerships with various, diverse sets of local and national organizations across a variety of areas such as the education and well-being of children, disaster relief, and the advancement of equality and inclusion. In addition, PNR is a founding member of the Permian Strategic Partnership which addresses five (5) critical issues in the region as listed below.

- Affordable Housing
- Healthcare
- Public Education
- Safer Roads
- Workforce Development

Within PNR, we have a third-party operated compliance and ethics hotline that provides a mechanism for anyone to report violations or concerns.

PNR requires all Employees, as well as Contractors and Suppliers, to comply with this commitment, and we encourage our other business partners to share our commitment to human rights and corporate social responsibility as well.

9. APPROVALS

Approver signature symbol(s) below represent wet signature(s) on file, and indicate signatories have read, fully understand, and endorse this document and its contents.

/s/	01/31/2024
<i>Signature</i>	<i>Date</i>
Ron Schindler	
Vice President, Legal and Chief Compliance Officer	
/s/	01/31/2024
<i>Signature</i>	<i>Date</i>
Tyson Taylor	
Senior Vice President, Human Resources	
/s/	01/31/2024
<i>Signature</i>	<i>Date</i>
Caroline Braich	
Managing Associate General Counsel	

UNCONTROLLED DOCUMENT