
EQUAL EMPLOYMENT OPPORTUNITY POLICY

Policy Statement

WPX Energy has a strong commitment to equal opportunity in the workforce and believes in treating people with dignity and providing equal employment and advancement opportunities for all. The Company values the unique contributions that each employee brings to his/her role within the Company and considers the variety of perspectives and backgrounds that exist within the Company a competitive advantage in the marketplace. The Company is committed to treating all employees fairly, without regard to any characteristics that have no bearing on job performance.

Objectives

The Company conducts business based on the following objectives:

- Recruit, hire, train, and promote persons in all job titles without regard to race, color, religion, sex, sexual orientation, national origin, age, marital status, disability, military status, genetic information or any other basis protected by applicable discrimination laws.
- Make employment-related decisions in a manner that furthers the principles of EEO.
- Ensure all personnel actions, such as compensation, benefits, transfers, layoffs, returns from layoff, company-sponsored training, education, tuition assistance, social and recreation programs, are administered without regard to race, color, religion, sex, sexual orientation, national origin, age, marital status, disability, military status, genetic information or any other basis protected by applicable discrimination laws.

Legal Requirements

The Company will comply with the following legal requirements as they pertain to EEO:

- Legally required notices will be openly displayed to ensure employee and applicant awareness of EEO policies.
- EEO-related records will be maintained in accordance with all applicable federal, state and local laws.
- If required by law, a written affirmative action program will be established and reviewed annually to ensure achievement of its objectives.
- Company personnel actions at all facilities will conform to this policy and to federal, state and local statutes regarding fair employment practices.

Applicability	<p>This policy applies to all employees and applicants of the Company. In addition, this policy applies to all terms and conditions of employment, including, but not limited to, hiring, placement, promotion, termination, layoff, recall, transfer, leaves of absence, compensation, and training.</p> <p>The Company is an Equal Employment Opportunity (EEO) employer and does not discriminate in any employer/employee relations based on race, color, religion, sex, sexual orientation, national origin, age, marital status, disability, military status, genetic information or any other basis protected by applicable discrimination laws.</p>
Consequences for Non-Compliance	<p>Adherence to policies is mandatory. A non-complying employee may face disciplinary action up to and including termination.</p>
Reservation of Rights	<p>The Company reserves the right to interpret, modify, terminate, or revise this policy or standard, in whole or in part, without notice. No provision in this policy or standard shall be construed as an employment contract or construed to alter any employee's at-will status. Similarly, statements within this policy or standard regarding behavior that may result in discipline or termination do not limit, in any way, the rights of the Company to discipline or terminate employees for only those behaviors described or referenced above. Each employee remains free to resign his or her employment at any time and for any reason or for no reason. Similarly, the Company reserves the right to terminate any employee at any time for any reason or for no reason. WPX reserves the right to terminate an employee with or without the use of progressive discipline.</p>
Effective Date	<p>11-01-2006 Revised: 01-01-2012</p>

ROLES AND RESPONSIBILITIES

Employees	<ul style="list-style-type: none"> ▪ Employees should direct questions regarding this policy to their supervisor or the Human Resources Department.
WPX Energy, Inc.	<p>The Company will:</p> <ul style="list-style-type: none"> ▪ Establish EEO policies and recruitment techniques designed to comply with those policies and all applicable federal, state and local laws. ▪ Monitor, enforce and support EEO to ensure compliance with the Company's EEO policy, and all applicable federal, state and local requirements. ▪ Conduct periodic audits and report to management on EEO performance. ▪ Review personnel actions on a regular basis to ensure equal opportunity exists for all employees. ▪ Endeavor to maintain a work environment free from discrimination and/or harassment. ▪ Provide avenues for employees to report a complaint about



discrimination and/or harassment.

- Investigate, discuss and take immediate and appropriate action on all employee complaints, and resolve these complaints to an appropriate conclusion.

ADMINISTRATIVE INFORMATION

Process Owner/Approver: Marcia MacLeod, Sr. Vice President, Human Resources & Administration

Signature: Approval document with signature on file with Human Resources

Approved: 12-31-2011

Effective: 01-01-2012

Reviewed: 24 months

Document Custodian: Kysa Rowe, Consultant, Human Resources