

Atmos Energy Corporation Categorical Standards of Director Independence

In accordance with the Atmos Energy Corporation Corporate Governance Guidelines, as well as applicable rules and regulations of the New York Stock Exchange, at least a majority of the Board of Directors shall be independent directors. For a director to qualify as independent, the Board of Directors must affirmatively determine, taking into account all of the relevant facts and circumstances, that such director has no material relationship with Atmos Energy Corporation or any of its subsidiaries (collectively, the “Company”), either directly or as a partner, shareholder, or officer of an organization that has a relationship with the Company.

The Board has established the following standards to assist it in determining whether a director has a material relationship with the Company. Each year, prior to nominating directors to stand for election at the annual meeting, the Board will evaluate whether any director or nominee has any material relationship with the Company other than as a director or nominee.

For purposes of these standards, an “immediate family member” of a person means such person’s spouse, parents, children, siblings, mothers and fathers-in-law, sons and daughters-in-law, brothers and sisters-in-law and anyone else (other than any domestic employees) who shares such person’s home but it does not include one who is no longer an immediate family member as a result of legal separation or divorce, or who has died or become incapacitated.

In order to assist the Board in making determinations of independence, a director may not be considered independent if:

- The director is, or has been within the last three years, an employee of the Company, or an immediate family member is, or has been within the last three years, an executive officer of the Company.
- The director has received, or has an immediate family member who has received, during any 12-month period within the last three years, more than \$120,000 in direct compensation from the Company, other than director and committee fees and pension or other forms of deferred compensation for prior service (provided such compensation is not contingent in any way on continued service).
- The director is a current partner or employee of a firm that is the Company’s internal or external auditor.

- The director has an immediate family member who is a current partner of a firm that is the Company's internal or external auditor.
- The director has an immediate family member who is a current employee of a firm that is the Company's internal or external auditor and personally works on the Company's audit.
- The director or an immediate family member was within the last three years a partner or employee of a firm that is the Company's internal or external auditor and personally worked on the Company's audit within that time.
- The director or an immediate family member is, or has been within the last three years, employed as an executive officer of another company where any of the Company's present executive officers at the same time serves or served on that company's compensation committee.
- The director is a current employee, or an immediate family member is a current executive officer, of a company that has made payments to, or received payments from, the Company for property or services in an amount which, in any of the last three fiscal years, exceeds the greater of \$1 million, or 2% of such other company's consolidated gross revenues.
- The director or an immediate family member is an executive officer of a foundation, university or other charitable organization to which the Company has contributed in any single fiscal year either directly, or indirectly, including through a donor advised fund or foundation, or through the provision of services, an amount that exceeded the greater of (a) \$500,000 or (b) two percent (2%) of the charitable organization's total annual receipts for any of the last three completed fiscal years.
- The director or an immediate family member is an executive officer of a significant lender of the Company. For the purposes of this categorical standard, a lender shall be considered significant if the credit extended is more than 5% of the consolidated assets of the Company.

Further, the Board has affirmatively determined that the following relationships are not material: (i) any relationships between the Company and an entity where a director is solely a non-management director and (ii) any transaction made in the ordinary course of business with a director, or an entity affiliated with a director, as a natural gas customer of the Company.

As Adopted by the Board of Directors
on August 4, 2020