

Doing the Right Thing

Williams' Code of Conduct for Suppliers and Contractors

At Williams, we are authentic. Our integrity cannot be compromised. We believe that it takes more than good business results to be a great company. We have built a culture based on our Mission and Core Values, where integrity is of the utmost importance and where unethical behavior will not be tolerated.

Our Core Values are engrained in how we do our work, every day, on behalf of our communities, customers, employees, and investors. We stand behind our reputation as a dependable and trustworthy business that delivers on our promises. This drives our commitment to be a good corporate citizen and to comply with all applicable laws and regulations, not only for those of us who work at Williams, but for all who interact with us.

Suppliers and contractors play a key role in our commitment to safely and reliably deliver natural gas products that fuel the clean energy economy. Williams encourages actions that are consistent with and further the objectives of our Core Values and Company Policies by using suppliers and contractors whose corporate values are consistent with ours.

The Code of Conduct for Suppliers and Contractors sets the expectations for those with whom we work.

Williams Core Values



CODE OF CONDUCT - SUPPLIERS AND CONTRACTORS

- **Authentic:** Our integrity cannot be compromised. For more than a century we've remained true to ourselves, always striving to do the right thing, every time.
- **Safety Driven:** Safeguarding our people and neighbors is engrained in our culture and fundamental to everything we do.
- **Reliable Performers:** We stand behind our reputation as a dependable and trustworthy business that delivers on our promises.
- **Responsible Stewards:** We are dedicated to strengthening our people and communities and to protecting the environment.

Human Rights. Williams expects its suppliers and contractors to comply with all applicable human rights and labor laws as well as **Williams' Human Rights Policy and Statement** and to follow **best practices** in the areas of **freely chosen employment, working hours, respect in the workplace, wages and benefits, and health and safety.**

Respect for Human Rights:

- **No Involuntary Labor, Human Trafficking, or Child Labor.** Suppliers and contractors must never participate in these activities. Any use will not be tolerated.
- **No Harassment or Discrimination.** Suppliers and contractors must ensure inclusive workplaces that are free of harassment and unlawful discrimination.
- **Reasonable Work Hours and Wages.** Suppliers and contractors must comply with all laws related to work hours, including overtime, minimum wage, and benefit requirements.
- **Respect for Indigenous Communities.** Suppliers and contractors must respect the rights of indigenous peoples, including their history, culture, and customs.
- **Ethical Sourcing.** Suppliers and contractors are expected to abide by all applicable laws and regulations related to ethical sourcing of goods, materials, and minerals. All necessary information to support reasonable country of origin inquiries and due diligence with respect to the source of goods, materials, and minerals must be provided upon request.

Ethics & Legal Compliance. Williams expects our suppliers and contractors to conduct business ethically and to comply fully with all laws and regulations.

- **Antitrust & Anticorruption:** Williams believes that fair competition and free enterprise serve the best interest of our company and its stakeholders. Williams does not tolerate the offering or accepting of bribes, kickbacks, or other payoffs designed to influence the recipient's judgment. Suppliers and contractors must comply with all applicable U.S. or international laws regarding fair competition, antitrust, and anticorruption

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- **Conflicts of Interest:** Williams' actions must always be in the best interest of the company. We expect our suppliers and contractors to act in this same manner and avoid or disclose any activity or relationship that may interfere, or have the appearance of interfering, with that commitment. This includes the offering of payments or gifts and entering into business relationships with Williams employees.
- **International Business Dealings:** Suppliers and contractors must be aware of and comply with international laws, including import and export laws, and may not use any suppliers, services, or equipment subject to or from locations which are subject to United Nations, U.S., or EU economic sanctions.

Asset and Information Protection. Williams expects our suppliers and contractors to safeguard Williams' information and protect our assets from loss, misuse, damage, or unauthorized use.

- **Protect Assets:** Suppliers and contractors must use Williams' assets responsibly and only for legitimate business purposes. Williams' assets include, but are not limited to, Williams' facilities, equipment, systems, technology, intellectual property, and office supplies. Suppliers and contractors shall not use Williams' trademarks, patents, copyrights, trade secrets, and other intellectual property without express written permission from Williams.
- **Protect Technology:** Suppliers and contractors must protect Williams' technology, including the infrastructure, technologies, hardware, software, or other information resources used by Williams for information processing transfer, storage, and communications. Suppliers and contractors should have no expectation of privacy when using Williams' technology, which may be monitored for any legitimate business purpose.
- **Protect Information:** Suppliers and contractors must protect and prevent the disclosure of Williams' confidential information and confidential information entrusted to Williams by others, including, but not limited to, Williams employees, business partners, customers, contractors, and suppliers. Confidential information means any nonpublic information, in any format, that is disclosed or made available to a receiving party, directly or indirectly, through any means of communication or observation. Suppliers and contractors must take reasonable steps to protect against all forms of cyberattacks or other intrusions, including phishing. All suppliers and contractors with access to Williams' systems must be vigilant, scrutinizing any email received from an unknown sender and reporting suspicious emails to the Williams Cybersecurity Team. Additionally, there is an expectation of timely completion of any assigned cyber security awareness training, and successfully reporting emails received in simulated phishing campaigns by the company used to verify user compliance and awareness. Failing simulated phishing campaign emails and/or actual phishing emails is a violation of this Policy.

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- **Protect Privacy:** Suppliers and contractors that have access to personal information that has been entrusted to Williams must take reasonable steps to prevent its misuse, theft, fraud, or improper disclosure and must comply with all applicable data privacy laws.

Environmental, Health & Safety. Williams is committed to the goal of healthy, safe, and environmentally sound business practices and operations. Williams expects all suppliers and contractors to be equally committed to those goals and work towards continuous improvement of environmental, health, and safety performance.

- **Protect the Environment:** Suppliers and contractors will comply with all applicable environmental laws and regulations. Suppliers will strive to reduce environmental impact in their operations through efforts such as minimizing greenhouse gas emissions and waste and using resources efficiently.
- **Protect Health & Safety:** Suppliers and contractors are responsible for complying with all applicable workplace health and safety laws and regulations and engaging in full and open discussion to address responsible standards and practices where laws and regulations do not exist.
- **Protect Communities:** Suppliers and contractors must commit to conducting their business in a manner that protects people and the environment. Suppliers and contractors must make environmental, health, and safety considerations a core component in existing operations and in the planning, design, and construction of new and expanded facilities, including the integration of physical risk management into their business and decision processes.

Reporting Concerns & Misconduct. Williams is committed to appropriate conduct by our employees, suppliers, and contractors. If a supplier or contractor is aware of, or has a concern regarding, the conduct of a Williams employee or anyone acting on behalf of Williams, they should inform a member of Williams management or contact the Williams Action Line.

- **Williams Action Line (800) 324-3606 or www.williams.ethicspoint.com.**
- **Williams does not tolerate retaliation for reports made in good faith.**

All Rights Reserved. Williams reserves the right to monitor suppliers' and contractors' compliance with this Code. Suppliers and contractors who are not in compliance with this Code may be subject to contract termination and/or precluded from consideration of future business. Any corrective actions necessary for a supplier or contractor to maintain or re-establish compliance with the Code must be promptly implemented.