



Gift Policy Pertaining to Government and Regulatory Officials and Employees	
Applicability	This policy applies to all employees and non-employee/contingent workers.
Purpose	Williams is committed to compliance with all applicable laws, regulatory requirements, and internal policies and procedures related to gifts to government and regulatory employees.
Policy	<p>There are very strict rules pertaining to gifts to employees of federal, state, local and other governmental agencies, including, in some cases, a complete ban on gifts.</p> <p>Williams employees are prohibited from giving gifts to government and regulatory employees due to the potential appearance of impropriety and the potential for mistakes due to the complexity of the rules. This policy applies even in the case where the government or regulatory employee agrees to reimburse Williams or the Williams employee for the gift. It is the responsibility of all Williams employees to comply with the prohibition on gifts and understand that there are penalties for non-compliance.</p> <p>Many government agencies do not consider minor food items to be gifts. These items include snacks, which are nominal food items (e.g., coffee, soft drinks, water, cookies, or similar modest food items). There may be times when meetings, inspections, public outreach, site visits, or similar events with government employees take place during a normal lunch period. During these meetings, a modest lunch may be offered if the cost is less than \$20 and the agency has confirmed that they may accept the lunch.</p> <p>Any exception to this policy, including meals exceeding \$20, require prior written approval from the General Counsel by submitting the Approval Form.</p>



<p>Consequences / Penalty for Non-Compliance</p>	<p>Adherence to this Policy is mandatory. Non-compliance may result in disciplinary action, up to and including termination.</p> <p>Exceptions or deviations must be requested and approved according to the Exception Procedure or disciplinary action may apply. Any deviation from or exception to a Policy will be granted at Williams’ sole discretion and should not be deemed as a general deviation from or exception to the Policy as a whole.</p> <p>A violation, or suspected violation, of this policy should be reported to your manager, your Human Resources Business Partner, the Business Ethics Resource Center, or the Williams Action Line at 800-324-3606 or online at www.williams.ethicspoint.com.</p>
<p>Reservation of Rights</p>	<p>The Company reserves the right to interpret, modify, terminate, or revise this Policy in whole or in part, without notice. Statements within this Policy regarding conduct that may result in discipline do not limit, in any way, the Company’s right to discipline employees for conduct not specifically described above. In addition, this Policy shall not be construed as an employment contract or to alter any employee’s at-will status. Employees and the Company remain free to terminate the employment relationship at any time, with or without cause or notice. Similarly, the Company reserves the right to terminate an employee with or without the use of progressive discipline.</p>
<p>Terms and Definitions</p>	<p>Gifts: A gift is any item of value. Business gifts, broadly defined, include company logo’d items, meals, travel, entertainment, access to high-profile events, and items of nominal costs including refreshments.</p>
<p>Related Documents</p>	<p>Approval Form</p>

<p>Administrative Information</p>	
<p>Policy Owner</p>	<p>SVP & General Counsel</p>
<p>Policy Custodian</p>	<p>PAC Manager</p>
<p>Last Revised</p>	<p>August 1, 2020</p>
<p>Approval Date</p>	<p>August 1, 2020</p>
<p>Effective Date</p>	<p>August 1, 2020</p>