

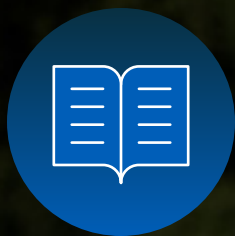


WE MAKE CLEAN ENERGY HAPPEN™

# 2019 Sustainability Report







# Overview

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Cover Photo: Communication Specialist Nicole Nascenzi,  
Field Office Administrator Tammy Bonnace and  
Environmental Specialist Adam Hills in Wysox, Pennsylvania.

Interior Photo: Environmental Specialist Tara Meek and  
Engineer Nathan Weimer in West Virginia.



# CEO Letter

GRI 102-14

For more than a century, Williams has been providing the essential infrastructure that safely delivers natural gas. With the growing urgency to transition to a low-carbon fuel future, our strategy provides a practical and immediate path to reduce industry emissions, support the viability of renewables and grow a clean energy economy. Our roots run deep, and today we handle about a third of the natural gas in the United States that is used every day to reliably and affordably heat our homes, cook our food and generate our electricity. We work hard to maintain our reputation as a responsible and dependable business that delivers on our promises, and our four Core Values are engrained in how we do our work every day on behalf of our stakeholders.

## Authentic

A culture of authenticity, integrity and open communication is at the heart of Williams. We are transparent about the opportunities and challenges that come with transporting natural gas as a reliable source of clean fuel, heat and power, so in the spirit of open communication, we met with institutional investors in 2019 to better understand what they wanted to see from Williams in our sustainability strategy and reporting. Aligned with our commitment to transparency, we are pleased to address Sustainable Accounting Standards Board disclosures in this report. Further, we are exploring how to address the recommendations of the Task Force on Climate-related Financial Disclosures.

## Safety Driven

We continue to drive a safety-first culture by training and empowering our people to complete projects, perform maintenance and operate our assets in a way that continuously improves the industry standard. Every employee has full stop work authority when they recognize a safety issue and are empowered to shut down our activities to make it right. In 2019, we implemented Shifting Gears, a new reward program to recognize employees for identifying and mitigating workplace hazards, and thanks to the ongoing efforts of our employees, we beat our 2019 goal for reducing recordable injuries by 200% and updated our 2020 goal to improve even further.

## Reliable Partners

Demand for clean, reliable natural gas is at an all-time high, particularly in markets where it has had a direct impact on significantly improving regional air quality. In 2019, we demonstrated our ability to work with a wide range of stakeholders in a constructive manner to address regulatory, political and community concerns while still permitting and building important infrastructure expansions in challenging markets. We also adopted new ways of partnering with more environmentally and socially conscious suppliers and contractors, and we are now in the process of rolling out the new policies across Williams in 2020.

## Responsible Stewards

Doing what is right for our environment and our communities is critical to our ability to manage risk and deliver long-term value to stakeholders. We invest in responsible environmental stewardship as part of every project and reducing methane emissions is a critical component of our climate strategy. In 2019, we implemented a methane emissions reduction initiative in the northeast to identify new opportunities to reduce greenhouse gas emissions across our gathering and processing operations. We also entered a partnership to implement a dairy biogas project in Washington expected to go into service in 2020, which we estimate will offset approximately 50,000 metric tons of greenhouse gas emissions each year.

Stewardship also means being a good neighbor, and we are always seeking opportunities to partner with our communities, invest in local priorities and respond to community concerns. Through our 2019 charitable giving efforts, we invested \$9.7 million in the communities where we operate, and our employees donated 33,000 hours of volunteer manpower at organizations across the United States.

Of course, as I write this letter, supporting our communities has taken on even greater importance as our world has changed in ways we couldn't have imagined due to the ongoing impact of COVID-19. First and foremost, Williams has taken action to safeguard the health and safety of our employees. As a critical natural gas infrastructure provider, we maintain robust plans and contingencies to ensure business and operational continuity. We continue to make immediate changes to business practices to stay aligned with federal and state guidelines related to coronavirus.





We also are monitoring the volatility in the energy market and the potential impact this will have in those communities whose livelihood comes from this industry. That's why in March 2020, we funded an additional \$1 million to the Williams Foundation for COVID-19 relief, and we accelerated payment on budgeted grants to first responders, food pantries and other social service agencies.

Williams has also taken steps to safeguard the company and our shareholders amid the severe disruption in the energy market. The adoption of the Shareholders Rights Plan in March 2020 was intended to protect the interests of our shareholders by reducing the likelihood that any person or group could take advantage of volatile markets and gain control of the company through open market accumulation or other tactics without paying a fair value for the company.

We often take our warm and well-lit homes for granted, but it has taken great dedication, extra effort and resourcefulness to keep our most basic energy needs available during these disruptive times.

At Williams, we view sustainability as synonymous with strong business fundamentals, and this letter outlines just a few of our accomplishments in 2019. We strongly believe that natural gas has been — and will continue to be — a cornerstone of our nation's prosperity in the 21st century. Natural gas has driven significant reductions in U.S. CO<sub>2</sub> emissions, lowered consumers' utility bills and paved the way for investment in renewables. Looking forward, we will continue to respond to evolving market dynamics as we responsibly manage our environmental, social and governance performance and meet the financial expectations of our shareholders. As interest around a clean energy future accelerates, our strategy provides significant solutions that we can execute on today.

We look forward to continuing this journey we've been on for over a century.

A handwritten signature in black ink, appearing to read 'Alan S. Armstrong', with a stylized, sweeping flourish at the end.

**Alan S. Armstrong, President and Chief Executive Officer**

WILLIAMS WAY SPOTLIGHT

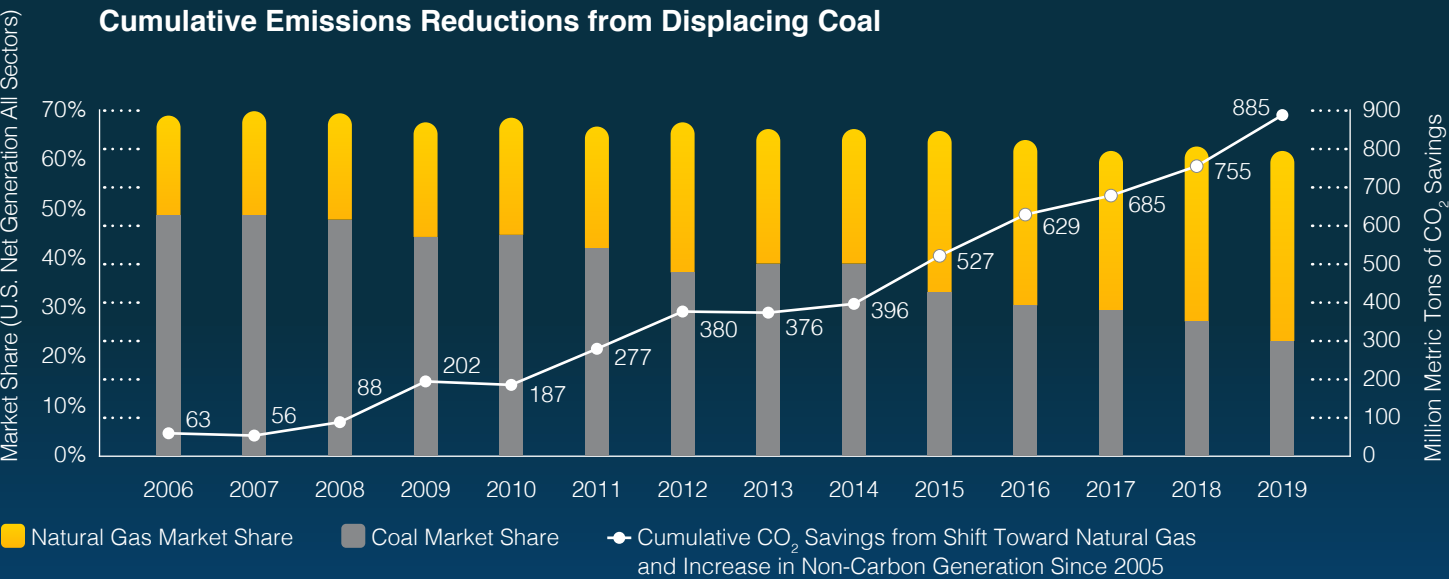
# Williams Participation in National Petroleum Council Study

Williams supports government-led research efforts to advance industry knowledge and broaden public understanding of our industry. In 2019, Williams' president and chief executive officer led Dynamic Delivery, America's Evolving Oil and Natural Gas Transportation Infrastructure, a National Petroleum Council (NPC) study on energy infrastructure requested by the U.S. Secretary of Energy. The purpose of the study was to determine the future need for U.S. oil and gas infrastructure under a variety of supply and demand scenarios. The study found that natural gas will continue to be a significant part of meeting the nation's energy demand through the study horizon of 2040 — even in low carbon demand scenarios. The study also highlighted the resiliency of natural gas infrastructure today and recommended research and development opportunities that can take our industry to the next level of safety and efficiency.



Harrison Hub facility in Scio, Ohio.

Global energy systems need to undergo a major transformation over the next 30 years to reduce carbon emissions. The current federal permitting policies are a key challenge to achieving this transformation. The NPC study calls on Congress to address this problem by clarifying the National Environmental Protection Act permit process. The study also recommends enacting a comprehensive national policy to reduce greenhouse gas emissions. Bipartisan actions by Congress and the Executive Branch in response to the study, including mechanisms to expedite the permitting process for large infrastructure projects, represent positive steps in the right direction.



Source: U.S. Energy Information Administration, Net Generation from All Sectors; Energy-Related Carbon Dioxide Emissions

“ One of the key findings of the study was that even in the low-carbon, high-renewable demand scenarios, natural gas will continue to play a leading role in meeting our nation’s energy demand throughout the study time horizon of 2040. ”

AMY SHANK, DIRECTOR OF PIPELINE INTEGRITY, SAFETY AND OPERATIONAL DISCIPLINE;  
CHAIR OF THE COORDINATING SUBCOMMITTEE

# About Williams

SASB EM-MD-000.A and GRI 102-1; 102-2; 102-4; 102-6; 102-7; 102-8; 102-16; 102-40; 102-42; 102-43; 102-44

Williams is committed to being the leader in providing infrastructure that safely delivers natural gas products to reliably fuel the clean energy economy. Williams is a publicly traded Fortune 500 company with nearly 4,800 employees. Based in Tulsa, Oklahoma, our operations span 26 U.S. states, including in the Gulf of Mexico, Rockies, Pacific Northwest and Eastern Seaboard regions. We own an interest in and operate 28 processing facilities, seven natural gas liquid (NGL) fractionation facilities and approximately 23 million barrels of NGL storage capacity. We deliver natural gas and NGL to markets with the greatest demand. Our transmission, gas gathering and liquids pipelines serve utilities, power generators, industrial customers and liquefied natural gas facilities.

Williams owns and operates more than 30,000 miles of pipelines systemwide — including Transco, the nation's largest volume and fastest growing pipeline — and handles approximately 30% of the natural gas in the United States that is used every day for clean power generation, heating and industrial use. See our [2019 Filing 10-K Annual Report](#) for our financial data.

Williams recognizes the important role natural gas plays in fueling the clean energy economy of today and tomorrow, particularly when it comes to displacing or providing alternatives to more polluting fuels. Natural gas is helping to significantly reduce emissions from the electric generation sector. It is also the ideal partner for renewable energy since it can quickly and reliably provide power when wind and solar resources are not available. Increased natural gas production coupled with a growing renewable energy market have helped the United States reduce carbon emissions to the lowest levels since 1988. Since 2005, our infrastructure has helped the United States decrease greenhouse gas emissions by 33 million metric tons — the equivalent of removing 7,006,369 gasoline-powered cars from the road for a year.

From 2005–2018, natural gas as a percent of total electricity generation in the United States has doubled<sup>1</sup>. At the same time, related CO<sub>2</sub> emissions decreased by 27%<sup>2</sup>.

## Our Core Values

Our Core Values are ingrained in how we do our work every day on behalf of our stakeholders.



### Authentic

Our integrity cannot be compromised; for more than a century we've remained true to ourselves, doing the right thing, every time.



### Safety Driven

Safeguarding our people and neighbors is ingrained 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

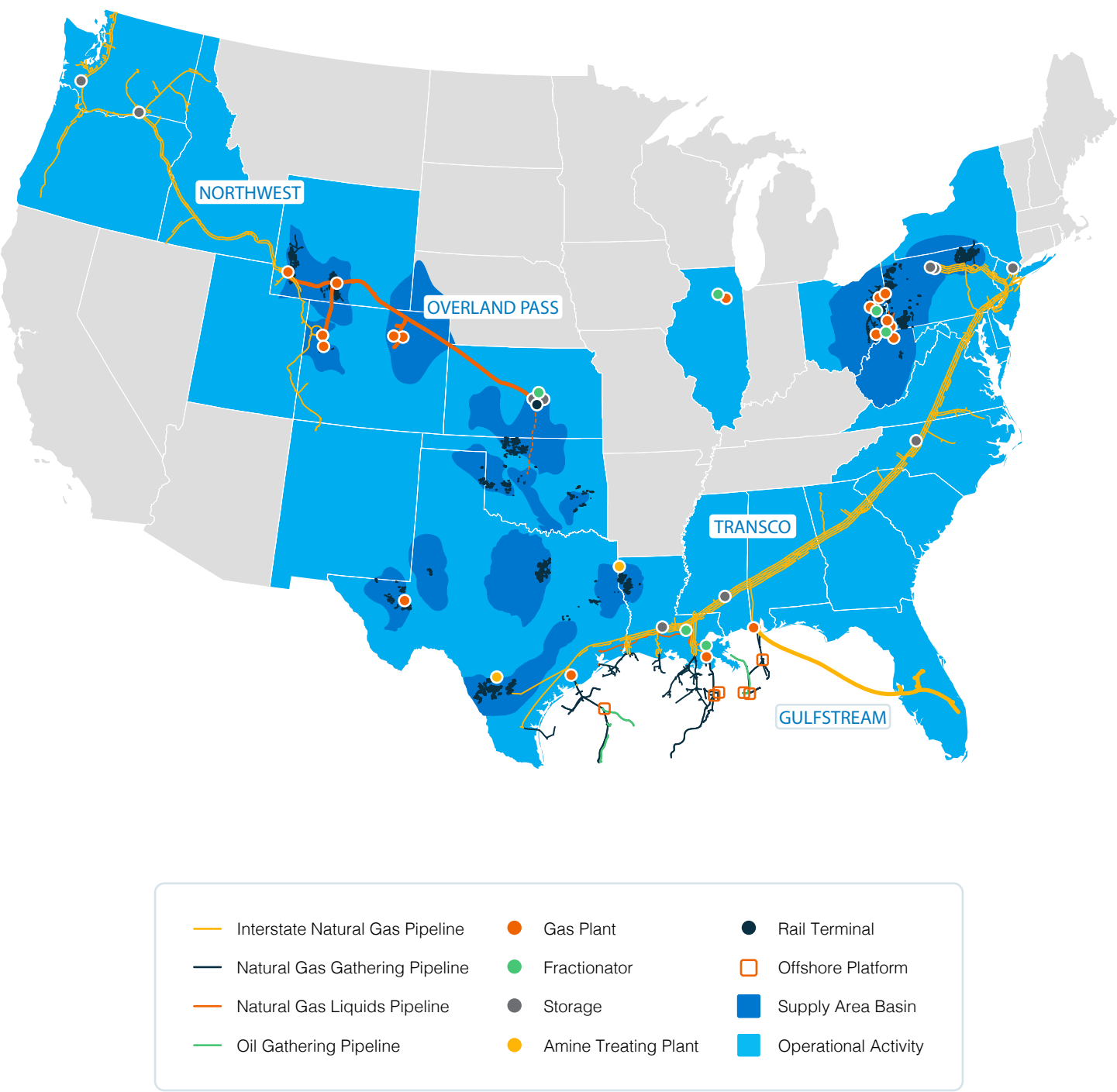
We are dedicated to strengthening our people and communities and to protecting the environment.

<sup>1</sup>U.S. Energy Information Association Natural Gas Explained.

<sup>2</sup>U.S. Energy-Related Carbon Dioxide Emissions, 2018.

# Williams Overview

At Williams, we understand the direct link between sustainable business operations, corporate stewardship and long-term financial success. By developing natural gas infrastructure responsibly, we can position our company to create long-term value.





## Williams by the Numbers

### Total Number of Permanent Employees by Region

|                    |       |
|--------------------|-------|
| Atlantic-Gulf      | 1,229 |
| Northeast          | 1,374 |
| West               | 1,127 |
| Tulsa Headquarters | 1,063 |

Operations Technician Lead  
Garrett Reese at the Harrison  
Hub facility in Scio, Ohio.



### WILLIAMS WAY SPOTLIGHT

## Integrating ESG Management Across Our Operations

The Williams Integrated Management System defines how we identify and mitigate operational risk to our people, assets and the environment. It drives integrated environmental, social and governance (ESG) practices into our everyday operations with the goal of making Williams a more sustainable company. The Williams Integrated Management System applies to all Williams employees, contractors, operating assets, projects and offices. We reference how we use our Integrated Management System to manage Williams' key ESG topics throughout this report.

# Stakeholder Engagement

In 2019, Williams engaged a diverse group of stakeholders, including employees, landowners, customers, industry associations, local communities, Native American tribes, investors and suppliers to understand different perspectives. Any stakeholder interaction with Williams is an important opportunity to demonstrate our Core Values. We pride ourselves on being an accessible and responsible corporate citizen in the communities where we serve and operate. We prioritize engagements with stakeholder groups that influence our business or are directly affected by our operations.

Williams regularly interacts with stakeholders using a variety of mechanisms, including in-person meetings, social media, open houses and community events. We work to identify the best engagement approach for each unique stakeholder group. Our objective is to maintain and strengthen relationships by understanding local needs, listening to stakeholder priorities and identifying opportunities to collaborate.

We actively pursue stakeholder feedback because it is critical to building collaborative relationships that develop appropriate solutions. Industry groups are an important source and representation of stakeholder concerns regarding environmental issues. Williams participates in various external sustainability initiatives, including Our Nation's Energy Future Coalition, Inc. (ONE Future), U.S. Environmental Protection Agency's Natural Gas STAR program and American Petroleum Institute Environmental Partnership to demonstrate our commitment to understanding stakeholder concerns and to reducing emissions from our operations.

In recent years, some of Williams' investors have asked for more insight into our sustainability practices. We are working to increase transparency related to our ESG performance, including through our Sustainability Report and the CDP climate change questionnaire. In 2019, we met with institutional investors to solicit feedback on our 2018 Sustainability Report. We used the feedback provided to inform the development of this year's report.



Conducted  
40 meetings  
with Native  
American tribes



Hosted more than  
100 community  
engagements

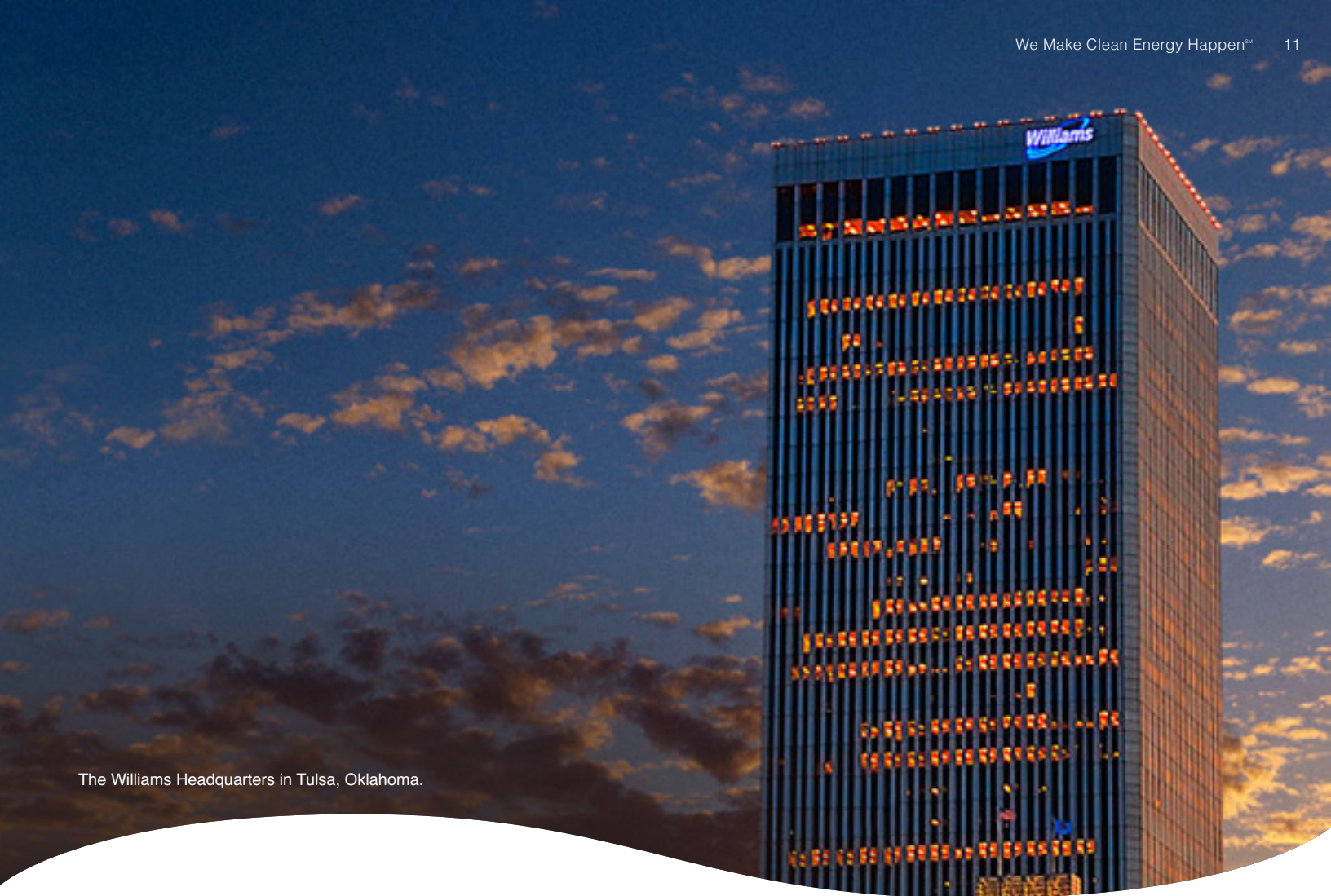


Maintained relationships  
with more than  
100,000 landowners



Participated in 33  
investor interactions  
featuring Williams  
management





The Williams Headquarters in Tulsa, Oklahoma.

# About This Report

GRI 102-46; 102-47; 102-50; 102-52; 102-53

Our annual Sustainability Report uses both qualitative descriptions and quantitative metrics to describe our policies, programs, practices and performance in environmental, social and governance areas. This 2019 Sustainability Report covers Williams' operations from January 1, 2019, through December 31, 2019, unless otherwise indicated. The report reflects the most accurate information available at the time of publishing. In this report, Williams (which includes The Williams Companies, Inc., and our subsidiaries) is at times referred to in the first person as "we," "our" or "the company."

In 2020, we conducted independent third-party limited assurance for select 2019 greenhouse gas emissions and safety data. See our ERM CVS Assurance Statement on [page 82](#) for more information.

Williams referenced the Sustainability Accounting Standards Board (SASB), Task Force on Climate-related Financial Disclosures (TCFD) and Global Reporting Initiative (GRI) Standards to guide the development of our 2019 Sustainability Report. This report has been prepared in accordance with the GRI Standards: Core option. At each stage in the report development process, we considered key reporting principles, including stakeholder inclusiveness, sustainability context, materiality and completeness. The report content reflects our most important sustainability topics as identified through our materiality assessment. For more information or to offer comments and suggestions about this report, contact [WilliamsContact@williams.com](mailto:WilliamsContact@williams.com).



Project Manager Nathan Salsi, Commercial Development Representative Amethyst Cavallaro and Supply Chain Manager Clem Collins in Pittsburgh, Pennsylvania.

## Materiality Assessment

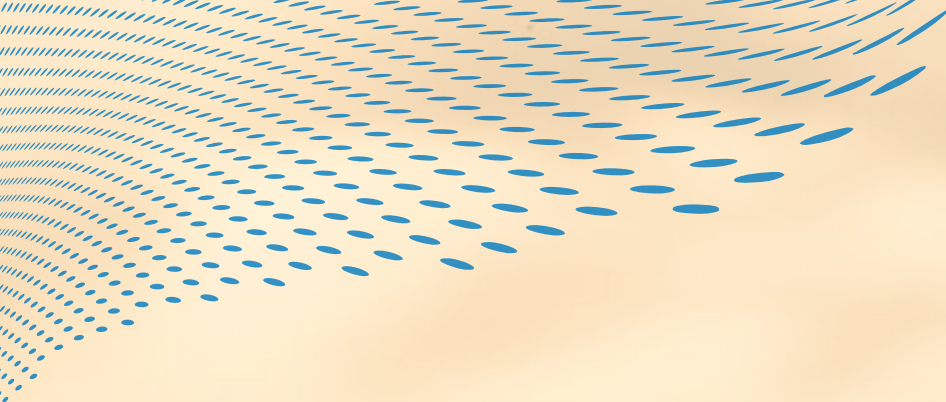
In 2018, we conducted a materiality assessment to better understand the sustainability topics most critical to Williams and our stakeholders. As part of this process, we surveyed a cross-functional group of Williams subject matter experts, interviewed senior leadership and reviewed internal documents to identify priority topics for the business. We conducted desktop research to understand the perspectives of external stakeholders, including a media review, peer company benchmark and reporting framework evaluation. We also reviewed the alignment between the topics we identified and the United Nations Sustainable Development Goals.

The outcome of this substantive assessment resulted in 13 material topics under the pillars of environment, social and governance, detailed in this report. We plan to conduct our next materiality assessment in preparation for our 2020 Sustainability Report. We envision this to be a highly collaborative process that will build on the foundation set in 2018. As such, there were no changes to our material topics in 2019.

| Topic                     | Definition  | Reporting Boundary  | Interested Stakeholders   |
|---------------------------|---|---|---|
| <b>Environment</b>        |   |   |   |
| Air Emissions             | Mitigating air emissions from our operations through operational efficiency initiatives, compliance with local and regional regulations, and participation in industry research.  | Internal: transmission, gas gathering, liquids pipelines, processing facilities<br>External: local communities              | Communities, Nongovernmental Organizations, Government, Customers                                   |
| Biodiversity & Land Use   | Managing impacts on biodiversity located near Williams' operations and contributing to environmentally focused organizations while protecting land by properly retiring assets, preserving soil and mitigating erosion.               | Internal: transmission, gas gathering, liquids pipelines, processing facilities<br>External: local communities, environment | Nongovernmental Organizations, Landowners, Government, Native American Tribes                       |
| Climate Change            | Managing the business and societal risks of rising global temperatures by expanding access to cleaner-burning natural gas while working to reduce greenhouse gas emissions.   | Internal: all operations<br>External: the public, investors   | Nongovernmental Organizations, Customers, Communities, Government, Shareholders, Trade Associations |
| Environmental Stewardship | Acting as good stewards of the environment and managing environmental impacts associated with water, waste, noise and spills through compliance with applicable regulations and adherence to strong internal policies and procedures. | Internal: all operations, environmental assessment team<br>External: local communities, environment                         | Nongovernmental Organizations, Communities, Customers   |



| Topic                          | Definition  | Reporting Boundary   | Interested Stakeholders  |
|--------------------------------|---|--|--|
| <b>Social</b>                  |   |  |  |
| Community Engagement           | Cultivating and maintaining relations with local communities, landowners and Indigenous Peoples while supporting local economic development and charitable giving in the locations where Williams operates.   | Internal: Williams community and project outreach team, Williams Foundation, corporate social responsibility team<br>External: local communities | Communities, Suppliers, Employees, Nongovernment Organizations, Government, Native American Tribes |
| Safety                         | Creating a safety culture that drives continuous improvement and managing the many aspects of safety at Williams, including personnel and process safety, asset and mechanical integrity, and emergency preparedness and response.                      | Internal: all operations<br>External: local communities, contractors, emergency responders   | Employees, Communities, Suppliers, Shareholders, Customers   |
| Supply Chain Management        | Supervising the procurement of goods and services necessary for Williams' operations, including overseeing environmental, social and governance practices, through effective policies, internal controls and audits.                                    | Internal: procurement<br>External: suppliers   | Suppliers, Communities, Customers  |
| Workforce Health & Development | Promoting the health and wellness of employees through medical benefits and wellness programs while creating a positive work environment through a strong focus on employee attraction and retention, employee development and diversity and inclusion. | Internal: all operations, human resources<br>External: local communities   | Employees  |
| <b>Governance</b>              |   |  |  |
| Board Leadership               | Selecting and maintaining a capable board of directors to oversee company operations and risk management through a rigorous board selection process and executive compensation programs that incentivize long-term business success.                    | Internal: board of directors, executive leadership<br>External: investors  | Shareholders   |
| Cybersecurity                  | Managing the evolving risks of cyberattacks on physical assets and business-critical information through training programs, policies and preventive measures.   | Internal: information technology, all operations<br>External: customers, local communities   | Customers, Government, Public  |
| Ethics & Integrity             | Embedding Williams' Core Values into the company culture and upholding the highest standards of ethics and compliance through our Code of Business Conduct, confidential reporting mechanisms and training courses.                                     | Internal: all operations<br>External: suppliers, customers, government officials, investors  | Employees, Customers, Shareholders, Landowners   |
| Government Relations           | Engaging with government officials related to Williams' operations and advancing the company's policy priorities.   | Internal: Williams government affairs and outreach team<br>External operations: federal, state and local governments                             | Government, Trade Associations   |
| Shareholder Relations          | Cultivating and maintaining positive relationships with shareholders through regular engagement across several communication mechanisms, and by incorporating shareholder feedback.   | Internal: investor relations<br>External: shareholders   | Shareholders   |



Environmental Specialist Tara Meek and  
Engineer Nathan Weimer in West Virginia.





WE MAKE CLEAN ENERGY HAPPEN<sup>SM</sup>

# Environment

As Williams develops and operates the large-scale infrastructure to help fuel the clean energy economy, we incorporate environmental considerations into our decision-making process. We want to preserve the environment for future generations while improving standards of living today. Williams takes care to reduce emissions, safeguard biodiversity and manage natural resources responsibly.

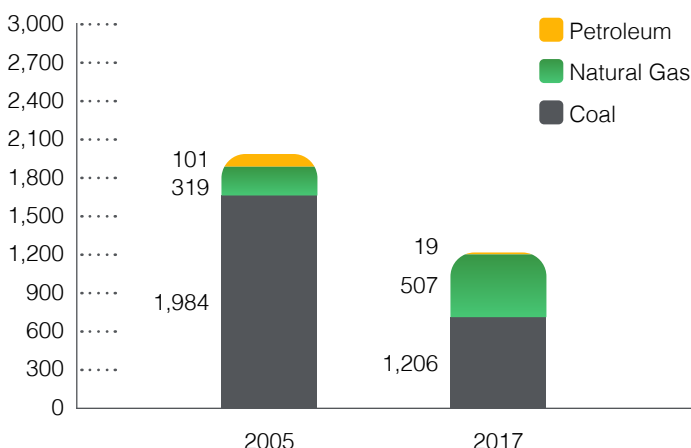
# Climate Change

SASB EM-MD-110a.1; EM-MD-110a.2 and GRI 103-1; 103-2; 103-3; 305-1; 305-2

Society faces an unprecedented challenge: meeting the world's growing energy demand while simultaneously addressing the risks of climate change. Williams recognizes the risks of climate change and our strategy provides a practical and immediate path to reduce industry emissions, support the viability of renewable energy sources and grow a clean energy economy.

As an energy infrastructure company, our primary objective is to be a leader in safely delivering the products people rely on for electricity generation, heating and cooking while contributing to the clean energy economy. We believe natural gas is an integral part of the low-carbon future, particularly when it comes to displacing higher-emission fuels such as coal and heating oil. Natural gas generates up to 60% fewer greenhouse gas emissions than coal. It is also a reliable fuel source, making it the ideal partner for intermittent renewable energy sources like wind and solar power. In fact, during extreme weather events, natural gas has remained a reliable and uninterrupted source of energy during times when it is needed most.

## 2005 & 2017 U.S. CO<sub>2</sub> Emissions from Electric Power Sector (Million Metric Tons CO<sub>2</sub>)



Source: [Energy Information Administration](#).



Commercial Development Manager Perrin Boone and Project Manager Paulina Hoyos in Pittsburgh, Pennsylvania.

According to the U.S. Energy Information Administration, between 2005 and 2017, CO<sub>2</sub> emissions from the electricity sector declined by 28%<sup>1</sup>. More than 60% of this total was attributed to natural gas replacing coal- and oil-based electricity generation<sup>2</sup>. This significant achievement represents the growing momentum and opportunity for natural gas to play an even larger role to reduce emissions in the United States without unfunded subsidies or negative economic impact. As we seek to meet growing demand for American-made energy, we remain committed to reducing greenhouse gas emissions from our operations, while also helping our customers achieve their emissions reductions goals.

In 2017, the Financial Stability Board's Task Force on Climate-related Financial Disclosures (TCFD) published a series of recommended climate disclosures that provide decision-useful information for investors, lenders and insurance underwriters. TCFD structured the recommendations in four areas: governance, strategy, risk management and metrics and targets. To increase transparency and respond to growing interest in our climate-related practices and performance, we are working to align our climate change reporting with the recommendations established by TCFD. For additional information on how Williams manages the risks and opportunities of climate change, see our response to the [CDP climate change questionnaire](#).

<sup>1</sup>U.S. Energy-Related Carbon Dioxide Emissions, U.S. Energy Information Administration (2017)

<sup>2</sup>The Role of Natural Gas in the Transition to a Lower-Carbon Economy, Interstate Natural Gas Association of America (2019)

## Governance

Our commitment to mitigating climate change risk extends to all levels of the organization, from operations managers to the board of directors. The board of directors oversees the effectiveness of the company's environmental, social and governance (ESG) risk management approach and ensures senior leadership is focused on relevant ESG matters, including climate change. While climate-related topics can arise in the context of all board committees and the full board, the governance and sustainability committee has primary oversight over climate change matters. Members of Williams' executive leadership regularly communicate on ESG topics to relevant committees and to the full board.

Highlighting Williams' commitment, the company appointed an environmental, social and governance director to develop and execute our strategy for increasing ESG integration, raising the visibility of our ESG capabilities, and engaging with shareholders to understand ESG expectations and communicate our performance. Because these responsibilities tie directly to our corporate strategy, the environmental, social and governance director reports to Williams' vice president of corporate strategic development.

## Strategy

Natural gas is critical to addressing and slowing climate change. It creates an immediate, practical and affordable solution for reducing emissions from oil and coal-fired electricity generation and is key to scaling renewable energy to the power grid in large volumes.

Our strategy to address the risks and opportunities of climate change includes:

- Connecting the best supplies to the best markets to maximize transportation efficiency, improve cost-effectiveness and significantly reduce emissions;
- Operating our assets efficiently through preventive maintenance and equipment upgrades;
- Using data analytics to identify and drive strategic emissions reduction initiatives;
- Collaborating with peer companies through key industry initiatives and trade organization involvement to uncover and implement innovative best practices;
- Exploring and implementing renewable energy opportunities, including renewable natural gas and solar energy;
- Focusing on the use of existing rights of way to reduce deforestation; and
- Funding and participating in research related to emissions detection, quantification and reduction technologies.

We are actively responding to and working with government regulators and customers who are developing greenhouse gas emissions reduction targets. In all cases, switching to lower-emission and renewable electricity sources will be a critical element of meeting emissions reduction targets. Williams is working to deliver clean natural gas while increasing our capabilities to reduce our own emissions and identifying renewable sources of fuel to supply to our customers.

### WILLIAMS WAY SPOTLIGHT

## Harnessing Solar Energy to Power Our Operations

We are taking steps to develop solar energy installations at facilities to provide electricity to our existing natural gas transmission and processing operations, an investment made possible through generous federal and state tax credits. Williams has been identifying locations where solar power installations are both economical and can be primarily sited on company-owned land that is adjacent to existing facilities. Sites under consideration span Williams' footprint, with initial sites identified in Alabama, Colorado, Georgia, Louisiana, New Jersey, North Carolina, Ohio, Pennsylvania and Virginia. These facilities are expected to be placed into service beginning late 2021. In total, Williams' facilities currently draw an average over 400 megawatts of electricity, purchased from our very reliable grid each day. We anticipate that agreements with local utilities will allow excess solar power not used by existing facilities to be sold back into the grid.



For example, Williams delivers renewable natural gas by partnering with energy companies in Washington, Ohio and Texas to transport landfill-produced methane, a byproduct of the waste decomposition process that occurs in landfills. Landfill-produced methane is a renewable fuel because methane is captured as biogas rather than being released directly into the atmosphere. Williams employs advanced gas analysis equipment to ensure the renewable gas stream is pipeline quality and can be safely commingled with conventionally produced gas.

Additionally, in 2019, Williams partnered with a dairy farm in Washington by building the necessary infrastructure to connect the biogas to our pipeline. The project is expected to go into service in 2020. As part of the project, we changed tariff specifications to allow for more renewable natural gas in our Northwest Pipeline system, while still ensuring safe transportation of the blended fuel. We anticipate the project will offset approximately 50,000 metric tons of greenhouse gas emissions — the equivalent of taking more than 10,800 cars off the road each year.

According to the U.S. Environmental Protection Agency (U.S. EPA), as of July 2019, there were 62 landfill-to-gas operational projects in the United States, with 35 being planned or under construction. The U.S. EPA has identified an additional 475 landfills across the United States with the potential for renewable gas projects. Williams is at the forefront of this technological advancement, and is committed to pursuing additional opportunities in this space.

Williams is a signatory of Interstate Natural Gas Association of America's Methane Emissions Commitment to implement methane reduction activities and perform leak surveys at all transmission and storage compressor stations by 2022. We use infrared cameras to quickly identify and repair leaking equipment, which can represent a large source of emissions for our industry. We are in the process of implementing a

formalized leak detection and repair program in 2020 to enhance how we mitigate unintended releases from transmission and storage equipment and measure associated success.

**From 1993–2019, Williams avoided more than 9 million tons of CO<sub>2</sub>e by implementing industry best practices and partnering with the Natural Gas STAR program, equivalent to taking nearly 2 million cars off the road each year.**

We have also been a member of the U.S. EPA Natural Gas STAR program since its inception in 1993. Natural Gas STAR is a voluntary partnership that encourages oil and natural gas companies to adopt cost-effective technologies and practices that improve operational efficiency and reduce methane emissions. We successfully implemented recompression measures to lower gas line pressure before pipeline maintenance to reduce methane emissions and make more natural gas available for sale. In cases where recompression technology was utilized in 2019, Williams successfully reduced pipeline blowdown greenhouse gas emissions by 87%.

In 2019, Williams joined the American Petroleum Institute Environmental Partnership, which provides a forum for participants to share information and analyze best practices and technological breakthroughs aimed at responsibly developing natural gas and oil resources. The Partnership represents a growing coalition of U.S. production, processing and transmission companies responsible for meeting the nation's growing demand for low-cost energy. Participating companies are committed to improving environmental performance by accelerating methane emissions reductions from key emissions sources.



Montauk Energy values our partnership with Williams at our Apex RNG facility in New Holland, Ohio. This facility cleans and processes landfill gas into RNG for injection into the Williams pipeline system. Williams' support of this project enables the beneficial use of RNG, the equivalent of reducing CO<sub>2</sub> emissions from 3.2 million gallons of gasoline consumed per year.



SCOTT HILL, VICE PRESIDENT OF OPERATIONS AT MONTAUK ENERGY

## Risk Management

Successfully managing our ESG performance is inextricably linked to our ability to mitigate risk and deliver long-term value to shareholders. We integrate climate-related considerations as a component of operational risk, which is integrated into key business planning and our annual risk assessment process.

Williams recognizes the reputational and physical risks that climate change can have on our business, and we implement appropriate mitigation measures. We pay particular attention to reducing methane emissions, which make up an estimated 15% of our assets' greenhouse gas emissions profile.

While natural gas is critical to the clean energy economy, we recognize that stakeholder opposition to natural gas development may affect our ability to maintain and expand our operations. That's why Williams plays an active role in educating and engaging communities, customers, nongovernmental organizations, industry associations and government officials to conduct research, understand different perspectives and explore collaborative solutions built on feedback. We host town hall and community meetings in person, when appropriate, to listen to different perspectives and discuss the benefits of our projects to communities and the economy.

Since 2012, we have reduced our reported methane emissions from gas processing plants and transmission compressor stations more than 41%. Over the same period, the throughput capacity at these facilities increased 40%.

We maintain extensive community outreach programs as well as provide informational websites and contact information, allowing stakeholders to ask questions or express concerns. We see this as critical to reducing risks to our business strategy that originate from misinformation and philosophical differences.

For a full list of Williams' risk factors, including those related to climate change, see our [2019 Filing 10-K Annual Report](#).



26% reduction in predicted methane emissions from 2017 to 2020.

Williams' Harrison Hub facility in Scio, Ohio.

### WILLIAMS WAY SPOTLIGHT

## Northeast Methane Emissions Reduction Initiative

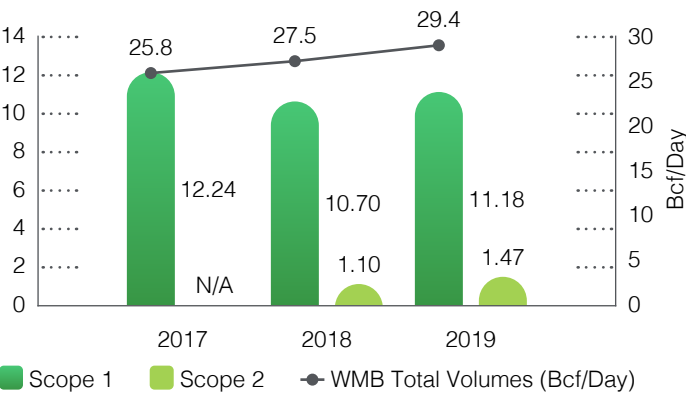
Williams implemented a methane emissions reduction initiative in 2019 to identify additional opportunities to reduce greenhouse gas emissions across our northeast gathering and processing operations. Williams invested an estimated \$475,000 in the initiative, resulting in a 26% reduction in predicted methane emissions for the year 2020 compared to 2017 — the equivalent of taking more than 14,300 cars off the road each year. As part of the initiative, Williams worked to prioritize opportunities with the highest potential to reduce emissions in a strategic and targeted manner to manage costs and maximize outcomes.

Using the U.S. EPA reported methane emissions for 2017, it was determined in the northeast that the best opportunities for methane reduction are equipment modification/replacement at existing facilities. This equipment includes, but is not limited to, pneumatic controller replacements, switching controllers to instrument air, replacement of gas-driven pneumatic pumps with electric pumps on dehydrator skids and installing more efficient burner units in dehydrator systems.

Metrics & Targets

Our Williams Integrated Management System includes requirements for monitoring greenhouse gas emissions and complying with federal and state reporting requirements. We prepare and submit an annual greenhouse gas emissions inventory to the U.S. EPA for our midstream gathering, processing and interstate transmission and storage operations. We also track and report Scope 1 and Scope 2 emissions data in accordance with the Greenhouse Gas Protocol.

Scope 1 & Scope 2 Greenhouse Gas Emissions (Million Metric Tons CO<sub>2</sub>e)<sup>1</sup>



<sup>1</sup>For more information on greenhouse gas emissions data, methodology and exclusions, see performance data table on page 66. 2019 data has been assured by an independent external assurance provider.

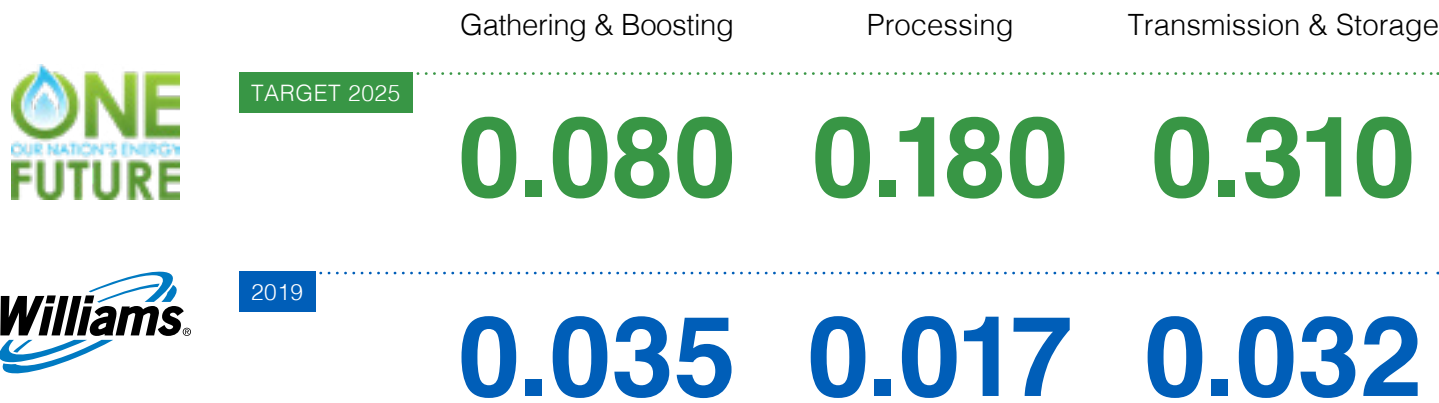
Accurately tracking greenhouse gas emissions with measurable data enables us to identify opportunities to increase operational efficiency and reduce emissions. Our subject matter experts and engineering groups work directly with environmental specialists and operations personnel to use this data to develop and implement initiatives to mitigate greenhouse gas emissions at our compressor stations, processing plants and storage facilities. Examples include conducting leak detection and repair assessments, installing electric motors on compressors and installing emission combustion devices.

In 2019, Williams joined Our Nation’s Energy Future Coalition, Inc. (ONE Future), a group of natural gas companies voluntarily working to reduce methane emissions by identifying policy and technical solutions that better manage emissions associated with the production, processing, transmission and distribution of natural gas. ONE Future members set a goal to reduce collective methane emissions in the natural gas supply chain to 1% by 2025. Williams has committed to the ONE Future 2025 methane intensity goals for industry sectors of 0.08% for gathering and boosting, 0.18% for processing and 0.31% for transmission and storage. As shown below, Williams is exceeding anticipated progress toward the ONE Future greenhouse gas reduction goal.


“ We use optical gas imaging infrared cameras at Williams stations to identify and repair fugitive emissions sources from compressor engines, as well as other types of vessels and piping. This is just one of the many practices Williams uses to mitigate emissions from our assets. ”

CHAD JOHNSON, ENVIRONMENTAL, HEALTH AND SAFETY SPECIALIST

ONE Future Methane Emissions Target & Williams Methane Emissions Performance (Percent)







A Williams right of way in Cecil County, Maryland.

# Environmental Stewardship

SASB EM-MD-160a.4 and GRI 103-1; 103-2; 103-3; 307-1

At Williams, we take care to preserve the environment for future generations while improving the standards of living today by delivering natural gas products that reliably fuel the clean energy economy. We incorporate environmental considerations into our decision-making process at all stages of our operations to reduce emissions, safeguard biodiversity and responsibly manage critical natural resources.

We aim to serve as responsible stewards of the environment while recognizing that the assets we operate and the products we deliver can affect people and the environment. We have processes in place to mitigate environmental risk across our operations and we meet or exceed applicable laws and regulations. Williams is committed to facilitating full and open discussions to address stakeholder concerns and develop responsible standards where regulations do not exist. We work to achieve the greatest benefit for all interested parties.

Our [Environmental, Health and Safety Policy](#) outlines our commitment to protect the environment and integrate environmental considerations into our core business activities. Every employee and contractor is responsible for adhering to this policy. Williams' environmental, health and safety committee within the board of directors oversees our company-wide culture of environmental protection, as outlined in our Environmental, Health and Safety Policy.

The Williams Integrated Management System is how we put our Environmental, Health and Safety Policy into action. The management system serves as our company-wide platform for providing requirements, guidelines, procedures, standards and specifications to manage and reduce operational risk and environmental risk. Our employees use the Williams Integrated Management System every day to conduct critical work, assure compliance with regulations and mitigate impacts to the environment. Updates to the system are driven by changing regulatory requirements and our steadfast commitment to continuous improvement.

Our Environmental Assessment program helps identify corrective actions to enhance compliance. We utilize internal resources to communicate findings and share best practices between franchises. The teams consist of internal and third-party environmental and audit professionals working collaboratively across the company to identify potential issues and evaluate environmental performance trends. We track all findings from the Environmental Assessment program to communicate strengths and opportunities from different operating areas across the company. In 2019, we assessed 12 of Williams' facilities through the Environmental Assessment program.



Operations Technician  
Cody Still at Williams'  
Harrison Hub facility  
in Scio, Ohio.

## Environmental Compliance

Upholding compliance with local, state and federal regulations while protecting the environment is critical to maintaining operational excellence, protecting our license to operate and delivering value to our shareholders. We are committed to meeting or exceeding all applicable environmental laws and regulations. The Williams Integrated Management System provides specific guidelines and policies for employees to follow, including regulatory requirements and industry standards. As such, adherence to the management system serves as a company-wide control for managing compliance risk and reliability.

In 2019, we updated our compliance tracking system to enhance how we manage business-critical work. As part of the process, we assign and track tasks to monitor completion of recurring environmental compliance responsibilities. Reminders associated with each task go out to relevant employees ahead of due dates to minimize risks of noncompliance.

To reinforce the importance of maintaining company compliance, Williams continues to reward front-line employees for timely completion of required tasks through the quarterly bonus incentive.

**Since 2017, we have reduced environmental-related notices of noncompliance by 60%.**

As an additional layer to promote compliance, our Environmental Assessment program establishes an evaluation process to systematically assess Williams' compliance with federal, state and local environmental regulations. By identifying opportunities for improvement, the program evaluates the effectiveness of our existing environmental programs and procedures. In 2019, Williams received 20 environmental-related notices of noncompliance. We continue to strive to reduce this number to zero. In 2018, we set a goal to reduce notices of noncompliance by 15%. We achieved that goal in 2019 with a 31% reduction and set a new goal to reduce notices of noncompliance by an additional 10% in 2020.

## Spill Performance

Williams views sustainability as synonymous with strong business fundamentals. We operate in a manner that protects the environment while delivering on the growing demand for cleaner energy in North America. Williams' track record shows that we are committed to preventing spills and releases from our operations, which can negatively affect the environment and the communities we serve.

### In 2019, we achieved a 39% reduction in reportable spills to soil and water from 2018 levels, exceeding our goal.

Our spill prevention, control and countermeasure operating requirements within the Williams Integrated Management System include company-wide procedures for preventing spills and mitigating the impacts of potential spills. Specifically, the requirements help determine when spill plans are needed and how to develop, implement and maintain effective plans. The plans also address compliance with regulatory requirements for pollution prevention at our owned and operated assets. If a spill occurs, we have processes and assets in place for controlling the spill to reduce its impact, reporting to regulatory and community stakeholders as required, remediating resulting impacts, investigating root causes and subsequently improving program management and other controls to reduce the risk of future events.

As part of our operations, we use tanks to store large quantities of hydrocarbon products such as natural gas liquids. Williams has an extensive tank inspection and testing program that adheres to industry standards to prevent spills from our tanks. The program provides guidelines for tank inspections conducted by Williams personnel, as well as third-party certified tank inspectors.

Our preventive maintenance plan is also a critical component of Williams' spill reduction efforts. In 2019, we implemented a safety and environmentally critical checklist to designate critical equipment and prioritize preventive maintenance activities accordingly. We took this voluntary step in response to incidents experienced by companies in the midstream sector. We work to implement best practices based on our own experiences, as well as the experiences of our industry peers.

In 2019, Williams reported eight hydrocarbon spills to soil and water, equaling 68 barrels of hydrocarbons in total. We have data collection initiatives in place to investigate, mitigate and share lessons learned to reduce the likelihood of a spill. In 2018, we started measuring and reporting a near-miss-to-incident ratio. In 2019, we increased our analysis of spill and release event data to identify leading indicators of more severe event occurrences. As a result of this increased awareness, the number of spills with environmental impact has decreased.

In January 2019, Williams experienced a rupture of a natural gas pipeline, resulting in the release of natural gas condensate into Parachute Creek, Colorado. Within 30 minutes, Williams acted to shut in the line. The rupture resulted in an estimated 13 barrels of spilled hydrocarbons, of which 12 barrels were recovered. The incident did not lead to groundwater contamination. Williams determined the event was the result of a lightning strike, knocking out power to the area, causing an over-pressure event to a section of pipe that experienced wall loss due to corrosion. We have identified lessons learned from this incident and applied mitigation measures to prevent future occurrences.

For example, Williams enhanced the monitoring and treatment of the pipelines and facilities in the area. Several of these preventive maintenance items include lowering the maximum allowable pressure of pipelines and facilities, installing monitoring devices to detect bacteria that cause internal corrosion, injecting biocide treatments and developing a five-year plan to target high-priority pipelines for enhanced inspection.

We set a loss of primary containment goal in 2020 to encourage further improvements in spill performance. This goal makes up 5% of our annual incentive program for employees, providing an increased focus on activities that help us meet enterprise safety and environmental commitments. While we target having zero spills, we also set a goal to achieve an additional 10% reduction in reportable spills in 2020.



## Noise Mitigation

Williams strives to be a good neighbor in the communities where we operate by managing noise from our facilities. Elevated sound levels can negatively affect humans and the environment, which is why we take responsibility for controlling noise from our operations and confirming compliance with federal, state and local regulations.

“The impact of noise on the surrounding environment is a key consideration in our engineering process. From selecting sites that offer a natural buffer between our facilities and our neighbors to specifying equipment to minimize sound levels, we are committed to being a good neighbor.”

GLENN KOCH, VICE PRESIDENT OF PROJECT EXECUTION, TRANSMISSION AND GULF OF MEXICO

Effective sound control begins with the permitting and design of any noise-generating facility. We incorporate equipment and architectural acoustics that meet or exceed applicable federal, state and local noise regulations to establish maximum decibel levels. We use a variety of technologies to reduce sound levels, including exhaust silencers, low-speed fans and centrifugal compressor units. We complement technology measures with building and landscaping designs that use trees and noise walls for sound deflection and absorption. As our operations expand or the local landscape evolves, we adapt to make sure we remain in compliance with noise regulations to remain good neighbors.

## Waste Management

Properly managing nonhazardous and hazardous waste from Williams' operations mitigates environmental impacts, promotes safe operations and protects human health. Williams focuses on proactively reducing waste from our operations and effectively managing the waste we do generate. The Williams Integrated Management System establishes a standardized process for managing hazardous and nonhazardous waste at company sites that includes waste characterization, storage, handling, packaging, transporting and disposal. This process, combined with training and compliance audits, forms the basis of our waste management approach. For example, waste management practices and performance are evaluated as a part of the Environmental Assessment program for further compliance assurance.

Williams manages waste from our operational activities through prescriptive measures, including placing waste in designated, labeled containers; maintaining waste storage areas; conducting inspections; and disposing of waste based on all applicable regulations. Our environmental specialists assist operations with waste classification, disposal and reporting. Common types of waste from our facilities and pipeline systems include used oil, pipeline coating, scrap metal and contaminated soils.

In our corporate offices, we pay special attention to recycling items such as paper, plastic and cardboard. In 2019, our Tulsa headquarters collected and recycled an estimated 23 tons of materials. We continue to seek practical opportunities to reduce waste from our offices and field operations. For example, we are conducting an internal assessment to identify facilities with the greatest potential to switch existing lighting technology to more efficient LED lightbulbs.

To promote the use of our products in a safe and environmentally sound manner, we manage chemical inventory reporting through the Williams Integrated Management System operating requirement for Tier II reporting and hazard communication. Environmental specialists prepare and submit Tier II chemical inventory reports to the appropriate regulatory agencies annually. Williams' Safety Data Sheets are publicly available to provide interested stakeholders with detailed information and meet local, state and federal requirements. For more information about Williams' Safety Data Sheets, visit our [website](#).

## Water Management

While water consumption is not a normal day-to-day part of operations, we understand this is an important topic for several stakeholders, including local communities and nongovernmental organizations. We believe water is a precious resource, and we recognize the importance of effectively managing any amount of water use.

Williams protects water resources during construction, operation and asset retirement through our environmental inspection and compliance programs. We adhere to all applicable environmental laws, regulations and permit conditions related to water. Williams also takes into account water resources when developing an asset or planning a new pipeline right of way. As part of our detailed routing and construction process, we thoughtfully review routing options to minimize impacts to the environment, including water resources. As part of the process, we seek to avoid constructing through forested wetlands and sensitive streams.

Williams focuses on preserving water at the highest rate possible, which is why we return the majority of the water back into the original watershed. We are able to do this because of a relentless focus on preserving water quality by adhering to stringent water quality standards established through federal and state regulations and permitting requirements. That means all the water we use must meet acceptable standards before returning it to the ground or surface. The majority of our water use is for hydrostatic testing during the commissioning process.

In 2019, we used approximately 15.76 million gallons of water for hydrostatic testing, most of which was returned to the same basin where it originated, or reused. Williams used less water in 2019 than in 2018 because we commissioned fewer pipeline expansion projects.

Williams also supports broad-based research on water-related topics. Williams is collaborating with state agencies to advance the understanding of seismicity in Kansas and is a member of the Consortium to Study Trends in Seismicity (CSTS), a public-private project to study trends in seismicity in Kansas. The CSTS has installed seismic stations strategically around the state and preliminary data shows that formation fluid pressures and corresponding reduction of seismicity may be occurring as a result of reduced injection fluid volumes.

# Air Emissions

SASB EM-MD-120a.1 and GRI 103-1; 103-2; 103-3; 305-7

At Williams, we understand the direct link between sustainable business operations and environmental stewardship. We pay close attention to air emissions that can impact local air quality and public health.

Williams actively works to reduce air emissions by maximizing operational efficiency and ensuring compliance with federal and state requirements. In doing so, we can limit our environmental footprint, support the health of community members where we operate and maintain long-term business value.

We recognize our responsibility to control air emissions — including volatile organic compounds, sulfur dioxide, nitrogen oxides and particulate matter — from our operations to minimize environmental risks and impacts to human health.

Our air quality management procedure within the Williams Integrated Management System establishes a standard approach for the construction, operation and maintenance of assets. The procedure outlines the required process for tracking and submitting air quality data to maintain compliance with applicable regulations and permits. We provide air quality permit training for employees who maintain our facilities and support capital projects. By tracking air releases from our operations, we are able to evaluate our performance and identify opportunities for improvement.

## 2019 Air Emissions

| Emission Type                             | Tons   |
|---|--------|
| Sulfur dioxide (SO <sub>2</sub> ) emitted | 425    |
| Nitrogen oxides (NOx) emitted             | 32,196 |
| Volatile organic compounds (VOCs) emitted | 9,208  |
| Persistent organic pollutants emitted     | 0      |
| Hazardous air pollutants emitted          | 2,655  |
| Particulate matter emitted                | 1,156  |

As we develop and operate the large-scale infrastructure that makes clean energy happen, we strive to achieve emissions reductions through innovative design and sound operating practices. In 2019, we surpassed our target to reduce the number of reportable air releases to the atmosphere by 15% from 2018 levels by achieving a 52% reduction. To demonstrate our commitment to continuous improvement, we established a 2020 goal to reduce reportable air releases to the atmosphere by an additional 10% from 2019 levels.

**In 2019, we surpassed our target to reduce reportable air releases by 15% from 2018 levels by achieving a 52% reduction.**

We regularly assess opportunities to reduce emissions from our operations. For example, we conduct routine equipment maintenance to improve fuel efficiency and perform tests on combustion units to confirm equipment is operating properly. We also implemented the following technologies to further reduce air emissions:

- Non-selective catalytic reduction, high-pressure fuel injection and pre-combustion chamber technology on legacy reciprocating engines and selective catalyst reductions on new combustion turbines to control nitrogen oxide emissions.
- Oxidation catalysts on reciprocating engines and turbines to control carbon, volatile organic compound and formaldehyde emissions.
- New compression designs, including turbine compressor startup and shutdown, site-wide emergency shutdown testing and a compressor vent gas reduction system.

Additionally, the Transco Emissions Reduction program is a proposed plan to replace more than 150 units with state-of-the-art equipment and emissions control technology over a seven-year period, significantly reducing key air pollutants, particularly nitrogen oxides and methane.



# Biodiversity & Land Use

SASB EM-MD-160a.2; EM-MD-160a.3 and GRI 103-1; 103-2; 103-3; 304-4

## Protecting Biodiversity

At Williams, we take pride in being a good steward of the environment as well as a trusted neighbor. Our goal is to operate in a manner that protects the health of local ecosystems so we can leave a better world for future generations.

Williams' biodiversity practices are governed by regulatory and company-driven policies. We use a systematic approach to incorporate biodiversity into the planning process of all proposed projects, including extensive research to identify sensitive habitats within a proposed project footprint.

Our environmental assessments incorporate geographic information system (GIS) analyses, computer-based reviews and site surveys to pinpoint sensitive environmental and cultural areas. We pay special attention to streams and wetlands; rare, threatened or endangered species; and culturally important sites. Based on the results of our assessments, we implement site-specific management plans that avoid or minimize negative impacts. We develop plans in compliance with all applicable regulations, including those promulgated or enforced by the U.S. Fish and Wildlife Service, Bureau of Land Management, U.S. Army Corps of Engineers and the Federal Energy Regulatory Commission.

To the extent practicable, we design projects that use existing rights of way and avoid areas with high biodiversity. We follow the hierarchy of avoid, minimize and mitigate as required by federal permitting agencies on infrastructure development projects.

If sensitive areas cannot be avoided by rerouting during the design phase, Williams works closely with state and federal agencies to obtain the necessary permits and approvals to minimize impacts. In such instances, we collaborate with interest groups, biodiversity experts, community organizations and land management agencies to develop appropriate mitigation plans. Common mitigation measures include revising timing, minimizing construction footprints and implementing specialized construction methods. In 2019, 35% of land owned, leased and operated by Williams was within or near areas of protected conservation status or endangered species habitat. The table below shows the number of International Union for Conservation of Nature (IUCN) red listed species within the counties where Williams operates.

### 2019 International Union for Conservation of Nature Red List Species in Williams' Areas of Operation

| Threat Level          | Number     |
|-----------------------|------------|
| Critically Endangered | 28         |
| Endangered            | 47         |
| Vulnerable            | 34         |
| Near Threatened       | 16         |
| Least Concern         | 30         |
| <b>Total</b>          | <b>155</b> |



Transmission station 605 in Clinton Township, Pennsylvania.

We identify tangible means of demonstrating our ongoing commitment to being good environmental stewards. For example, Williams committed nearly \$12 million to establish a Voluntary Mitigation Fund to offset the impacts of our Atlantic Sunrise project on migratory bird and bat habitats, including the eastern small-footed bat. To date, the program has funded nine projects that collectively protect more than 6,600 acres of migratory bird and bat habitat across nine counties in Pennsylvania. We completed six of these projects in 2019 as part of our ongoing efforts to support threatened and endangered species in the region.



Contractors conducting cultural resource surveys on the Bluestem Pipeline right of way.

Portions of Williams' existing northeast and northwest U.S. pipeline systems are located in sloped, landslide-susceptible terrain. Williams is committed to reducing the risk of landslides, which can potentially affect pipeline integrity and disrupt the environment. Williams assesses landslide potential on proposed pipelines and implements mitigation measures during new pipeline construction to prevent landslides from occurring on new rights of way. We continually monitor and remediate susceptible sites using field and aerial patrols coupled with annual light detection and ranging surveys. As part of this effort, we employ best-in-class technologies such as unmanned aerial vehicles. Williams follows [The Nature Conservancy guidelines](#) to help reduce the risk of landslides, slips and erosion from tree-clearing and earthwork performed to install pipelines.

## Land Use

Williams is committed to appropriately retiring and remediating land used for our facilities and pipeline projects. We strive to return land to its original state and create opportunities for beneficial reuse. In 2019, Williams' environmental services team managed 110 active remediation sites.

Williams' asset retirement and removal obligation is a planning mechanism that allows us to identify the potential environmental impacts and associated costs of retiring an asset so we can proactively identify suitable solutions. As part of the process, we initiate a property assessment and subsurface investigation prior to any demolition or abandonment activity. The findings from the assessments help determine the most appropriate approach for restoring land no longer used as part of our operations.

When remediating land, we work to re-establish native plant and animal species and preserve soil and water resources. Our remediation plans meet state and local regulatory standards, and often include practices that exceed regulatory compliance. For example, we voluntarily implement restoration seed mixes at all new northeast gathering locations to promote both plant and pollinator diversity to help combat global declines in pollinator species. In 2019, Williams disturbed 24,132 acres of terrestrial land.

During construction of the North Seattle lateral upgrade project in Washington, an old cedar tree was felled to make room for a facility. When the cedar tree was cut, Williams discovered a hollow void with a large honeybee hive. The environmental inspector for the project contacted the Williams natural resource permitting specialist to check if there were any permit requirements for saving honeybees. While no specific honeybee permit requirements existed, Williams felt it was within our corporate responsibility to save the honeybee colony. Work began immediately to locate a local beekeeper that was available to relocate the colony. The beekeepers estimated that Williams helped save more than 200,000 bees through the relocation process. Saving the bees was above and beyond the construction permit requirements, demonstrating Williams' passion for doing the right thing.

## WILLIAMS WAY SPOTLIGHT

## Supporting Biodiversity in the Areas Where We Operate

**Ruffed Grouse in Pennsylvania**

In 2019, Williams participated in a cooperative effort between the Pennsylvania Game Commission, Ruffed Grouse Society and Energy Transfer Partners to improve wildlife habitat on state game lands in Bradford County, Pennsylvania. This effort is part of a multi-phase initiative to increase the amount of habitat acreage on state game lands. The habitat, known as “early successional habitat,” is being developed to meet the needs of wildlife requiring young forests to flourish. Species dependent on this habitat include the ruffed grouse, American woodcock and golden-winged warbler, along with deer, bear and turkey.

**Mule Deer in Wyoming**

Mule deer migrate hundreds of miles across western Wyoming each year and need to move freely over great distances. Residential and commercial development in the area has hindered mule deer migration. Williams is partnering with the Wyoming Game and Fish Department to convert 25 miles of hazardous fencing near Wyoming’s grizzly wildlife habitat management area to wildlife-friendly designs that will promote the health of migrating mule deer. The project started in spring 2019 and is being conducted over five years with five miles of fence conversion per year.

**Waterfowl in Texas**

The Richland Creek wildlife management area southeast of Dallas-Fort Worth is home to environmentally critical waterfowl habitat. In 2019, Williams partnered with Ducks Unlimited to fund the implementation of water control structures at the Richland Creek wildlife management area. The controls help create and manage water flow in the wetlands, resulting in roughly 150 acres of new wintering waterfowl habitat. This effort represents one of several voluntary projects funded by Williams to benefit critical species’ habitat and water quality near our areas of operation in Texas.



These energy development companies have interests on state game lands and are committed to giving something back to wildlife and sportsmen.



PHIL KASPER, GAME COMMISSION LAND MANAGEMENT GROUP SUPERVISOR









WE MAKE CLEAN ENERGY HAPPEN<sup>SM</sup>

# Social

Williams could not make clean energy happen without our dedicated employees. We operate in a manner that protects our employees and contractors while safeguarding the public. We also recognize our responsibility to positively impact local communities through trusted relationships, meaningful investments and economic opportunities.

Operations Supervisors Jeremie Detling and Erika Baldauff at Williams' Oak Grove processing plant in Moundsville, West Virginia.

# Safety

SASB EM-MD-540a.1; EM-MD-540a.2; EM-MD-540a.3; EM-MD-540a.4 and GRI 103-1; 103-2; 103-3; 403-1; 403-2; 403-4; 403-5; 403-7; 403-8; 403-9

## Personnel Safety

Employees are the driving force behind our ability to operate safely and reliably. As we deliver the products that heat homes and generate electricity for millions of Americans, we remain committed to doing the right thing, every time. Aligned with our Core Values, we operate in a safety-driven manner that protects our employees and contractors while safeguarding the public.



Operations Technician Megan Oliver at our central compressor station in Kingsley, Pennsylvania.

Our [Environmental, Health and Safety Policy](#) provides a framework for integrating safety performance into our core business activities. Every employee and contractor is responsible for implementing this policy. The environmental, health and safety committee within the board of directors is responsible for governance and oversight regarding environmental, health and safety matters.

The Williams Integrated Management System is how we put our Environmental, Health and Safety Policy into action. The management system serves as our company-wide platform to manage and reduce risks in our operations, including safety risks. Senior leadership within each operating area is responsible for implementing the appropriate operating requirements, project standards and site-specific procedures set forth through the Williams Integrated Management System. The system aligns with the Occupational Safety and Health Administration (OSHA) and Pipeline and Hazardous Materials Safety Administration (PHMSA) requirements.

## Training & Awareness

We empower all employees and contractors to stop work if they suspect a safety hazard at any Williams location. Williams regularly recognizes our employees for their resolve to foster a safe work environment. In 2019, we implemented Shifting Gears, a new reward program aimed at recognizing employees for identifying and mitigating workplace hazards.

Since 2017, Williams has achieved a 47% reduction in employee recordable injuries.

Every employee completes safety training designed to promote on-the-job competency. Our annual training plan is tailored to the role of each employee based on the varying needs of office, field support and core field employees. In 2019, we developed a required training questionnaire tool to help managers confirm direct reports receive appropriate safety and compliance training based on specific roles and responsibilities. We have processes in place to assess training proficiency, including written knowledge checks and performance-based evaluations.

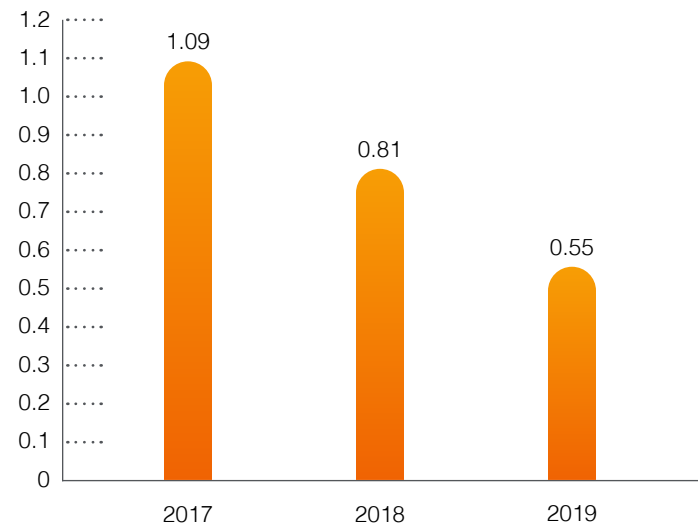
We also promote behavior-based initiatives to minimize safety risks from human factors. To strengthen these initiatives, we implemented a Hazard Recognition Focus project in 2019 aimed at teaching personnel about workplace hazards and how to identify them. The main types of work-related injuries we experienced in 2019 included muscle strain, and hand and finger injuries.

We maintain a strong safety culture by identifying, mitigating and communicating safety risks across the company. Williams expects every employee and contractor to report all incidents and near-misses related to personnel and process safety. We compile the results and share them with the entire company weekly to accelerate continuous improvement. Preliminary incident communications for both high potential severity and high actual severity incidents are communicated within a week to all employees to share initial findings and key takeaway messages. In 2019, we deployed an incident investigation training program to support our efforts to help standardize the incident investigation process.



We remain disciplined in our approach to improve our safety culture and performance. Our continuous improvement team has an ongoing responsibility to improve safety, reliability and performance by evaluating existing processes and incorporating lessons learned. In 2018, we set a goal to reduce recordable injuries for employees by 15% in 2019. We exceeded that goal with a 36% reduction in 2019. We set a new goal to achieve a 10% reduction in 2020. Additionally, we are taking a proactive approach to measuring our safety culture. Our environmental, health and safety assurance team is facilitating safety culture assessments across the organization, with a goal to complete an assessment at each of our 22 franchises within the next three years. To date, we have completed six assessments. Approximately one year after the baseline reviews, follow-up assessments will be conducted to ensure improvements in safety culture are being realized.

**Employee Total Recordable Incident Rate per 200,000 Work Hours**



#### WILLIAMS WAY SPOTLIGHT

## Life Critical Focus Program

Our Life Critical Focus program is designed to promote a daily culture of ongoing awareness of our 10 life-critical operating requirements. In 2019, we consolidated the number of operating requirements from 12 to 10 in an effort to streamline the program. We also redesigned our Life Critical annual field training with emphasis on applying relevant operating requirements to real-world situations. Williams' leaders and employees received informational material each month designed to raise awareness of the requirements.



DISABLING/BYPASSING A  
SAFETY CONTROL DEVICE



ELECTRICAL  
SAFETY



MANAGEMENT OF  
CHANGE (MOC)



SAFE WORK  
MANAGEMENT



LOCKOUT/TAGOUT



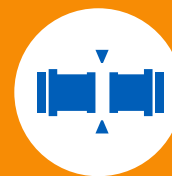
HOT WORK



CONFINED  
SPACE ENTRY



PRE-STARTUP  
SAFETY REVIEW



LINE BREAK



TRENCHING &  
EXCAVATING

## Contractor Safety

Our dedication to safety extends to third-party suppliers and contractors. Williams actively engages with contractors to support a safe work environment. Our standard contract language includes expectations for contractor and subcontractor safety qualifications, performance, competency and safety execution minimum requirements. We hold contractors accountable for satisfying contractual requirements and complying with all applicable laws, regulations and industry standards.

Williams' contractor safety management plan helps us pre-screen contractors, confirm compliance with safety guidelines and monitor contractor safety performance. Our safety grading process assesses contractors based on key performance areas including total recordable incident rate, fatalities, citations, drug and alcohol program compliance and safety management system compliance. Contractors not meeting our minimum requirements must submit a Contractor Risk Management Plan that needs to be approved by leadership and implement improvements in order to do business with us.

Williams conducts third-party safety audits and internal evaluations of our contractors to confirm they are meeting both regulatory and contractual requirements. Action items for the audits are tracked to closure. Failure to close actions by the due date results in a change of contractor status to "deficient" until actions are completed. Our environmental, health and safety specialists work with our contractors daily to maintain a safe and environmentally responsible work environment.

We provide a site- and project-specific orientation for all contractors at the start of each project. Williams uses a visitor log system to manage on-site registration and check the status of all contractors entering the site. We utilize an environmental, health and safety questionnaire process on projects over \$1 million to review the contractor's safety management system and safety leadership maturity as part of our bid evaluation process. Prior to mobilization, contractors' site-specific and environmental, health and safety management plans are reviewed against regulatory and contractual requirements to ensure contractors are integrated throughout the process.

For large projects, we conduct four-hour safety leadership workshops for contractors and employees to emphasize the importance of superior safety performance, and provide the entire project workforce safety leadership and hazard recognition skills training. In 2019, we implemented a safety leadership workshop for on-site contractors and employees engaged in our Hillabee project in Alabama. In total, more than 280 personnel participated in the four-hour workshop.

As part of our commitment to contractor safety, we collect and evaluate contractor safety metrics. We expect contractors to report all incidents and share lessons learned by completing incident investigations. In 2019, our contractor lost-time incident rate and total recordable incident rate were 0.09 and 0.83, respectively.

## Motor Vehicle Safety

Motor vehicle safety continues to be a focus for Williams and the energy industry at large. We seek to eliminate preventable motor vehicle accidents through a combination of equipment updates and employee awareness. Telematics units are installed on all employee fleet vehicles to track, measure and improve driver safety. We collect metrics on acceleration, cornering, speeding and braking, and share the data with employee leaders.

**In 2019, we achieved a 36% reduction in total claims costs, reflecting a decrease in the severity of motor vehicle accidents.**

In alignment with our robust reporting culture, we continue to report and evaluate all minor incidents such as a small dent in a bumper. Despite these efforts, we continue to face challenges achieving year-over-year reductions in our preventable motor vehicle accident rate. We will continue working until we achieve our target of zero motor vehicle accidents.

While we have made great progress reducing our higher-severity motor vehicle accidents, we have more work to do to reduce our low-severity incidents, particularly around hitting stationary objects at low speeds. We will continue to work on improving training and awareness in this area, including tools that will help us to improve our safe driving culture.

## Process Safety

Strong safety performance is synonymous with a well-managed company. We integrate safety into all aspects of Williams' operations, including how we manage our facilities and assets. Williams implements processes and equipment to prevent the uncontrolled release of hydrocarbons and hazardous substances. The Williams Integrated Management System includes a comprehensive set of policies and standards to manage process safety that ranges from pre-startup safety review policies to process hazard analysis requirements. To create a uniform approach to conducting safety reviews, we implemented a standardized management of change and pre-startup safety review software across the organization that more thoroughly evaluates and tracks modifications to our assets.

We design and operate our facilities to proactively manage process safety risks while complying with all applicable regulations and industry standards. We follow the [American Petroleum Institute](#) Recommended Practice 754 to track process safety occurrences. In 2019, we experienced 16 process safety Tier 1 events. We are always working to reduce this number to zero. We set a goal to decrease process safety incidents by 15% in 2019, and successfully achieved a 28% reduction. We set a new goal to decrease process safety incidents by an additional 10% in 2020. Williams continues to emphasize near-miss identification and reporting, which serves as a leading indicator of process safety hazard recognition. As a result, we are able to better investigate potential incidents and mitigate actual incidents before they occur. In 2019, we developed a key performance indicator dashboard for process safety incidents to further assess our safety performance and identify areas for improvement. We share lessons learned across the company to promote best practices.

Operations Technician Gerald Hawkins and Operations Supervisor Jeremie Detling at Williams' Oak Grove processing plant in Moundsville, West Virginia.





## Pipeline & Mechanical Integrity

### Pipeline Integrity

We operate more than 30,000 miles of pipeline systems to deliver the products the United States depends on for heating, cooking and electricity. All pipelines are thoroughly tested and inspected to rigorous standards when installed to ensure a baseline of high integrity, reliability and safety. Our assets must be safe and reliable to serve our customers and communities and to generate value for our shareholders.

We develop and maintain [Integrity Management Plans](#) for our transmission pipeline systems that provide a structured approach for continually evaluating risks and threats to safe and reliable operations. We implement controls to prevent or mitigate the effects of potential incidents. We use Integrity Assessments of pipelines and repairs of identified defects as one key element of maintaining pipeline integrity, reliability and safety. As of 2019, Williams has completed Integrity Assessments and all needed repairs on 92% of our transmission pipelines. Williams experienced 10 reportable pipeline incidents in 2019, 40% of which were significant.

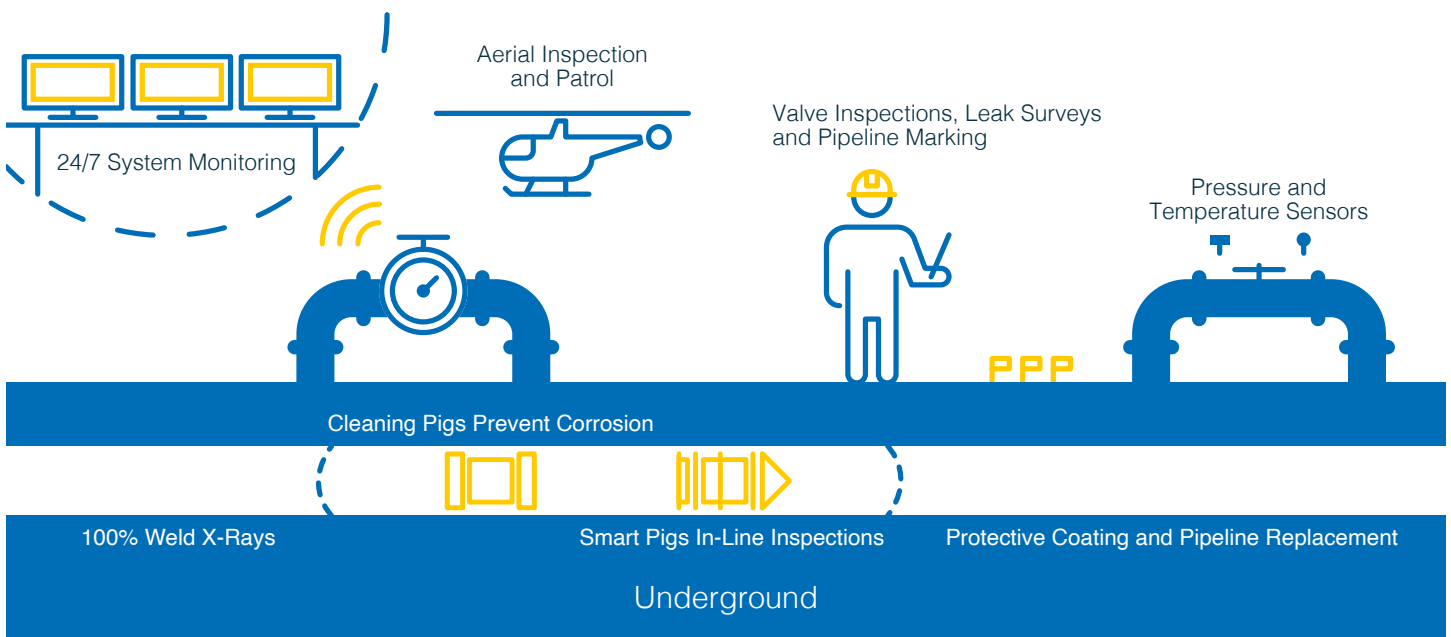
Williams continuously monitors pipelines for flow, pressure, temperature and other factors through our dedicated control centers, which include automated system response to potential leak conditions. Technologies such as infrared, acoustic and lasers also facilitate leak detection.

Williams continues to use Light Detection and Ranging (LIDAR) technology to monitor and respond to changing conditions in areas subject to landslides that could adversely affect pipelines. We also employ unmanned aerial vehicles to monitor pipelines for right-of-way activities that need investigation or response. We train pipeline control specialists on how to recognize abnormal conditions that could be the result of a pipeline leak and how to respond accordingly.

Williams completes aerial patrols at intervals prescribed by pipeline regulations and, in certain areas of more dense population, we complete the patrols more frequently than required. We also run cleaning pigs and use in-line inspection tools when needed for flow assurance and to manage the threat of internal and external corrosion. We coat all new pipelines with modern coating systems that act as the primary barrier to corrosion. In addition, we apply cathodic protection as a second line of defense to prevent corrosion.

Williams conducts an annual performance evaluation to assess all elements of the integrity programs, pinpoint any opportunities for improvement and develop action items to track completion of recommended improvements. As part of this process, in 2019, Williams identified additional metrics to add to our annual program evaluation, including tracking the number of pipeline assessments that required no remediation and those that required no in-field evaluations.

## Williams' Pipeline Integrity Program



In addition, Williams is in the process of implementing a comprehensive pipeline safety management system (PSMS) in accordance with the American Petroleum Institute Recommended Practice 1173. Our PSMS journey began in 2017 and will be fully implemented by 2022. PSMS is an elective program based on the Plan-Do-Check-Act philosophy of continuous improvement, and something Williams believes will have a measurable positive impact on our safety performance. Once fully implemented, Williams' PSMS will integrate several existing safety-related systems and processes, and will help identify and mitigate gaps that could result in incidents if left unchecked.

Williams conducts annual internal audits of our pipeline integrity initiatives along with external, third-party audits at least every three years. Williams completed an external, third-party audit of our liquid integrity management procedures in 2019. We also initiated a risk assessment improvement project for pipeline risk analysis to improve the reliability of our risk assessment results and facilitate better decision making to identify and prioritize improvements. We work to remain in compliance with all applicable laws related to our pipelines. In 2019, we experienced \$1.9 million in monetary losses as a result of legal proceedings associated with federal pipeline and storage regulations.

### **Mechanical Integrity**

Williams operates gathering and processing facilities across the continental United States. Maintaining the integrity of these facilities is critical to safeguarding our employees, contractors and the public, while ensuring the continued safe operation of those facilities. The mechanical integrity requirements and guidelines, captured in the Williams Integrated Management System, outline company expectations for managing mechanical integrity quality assurance, data management and midstream inspections.

Williams conducts assessments and visual inspections of facilities on an interval-based schedule using a corrosion-based analytical process, including special emphasis assessments at higher-risk areas. When new equipment is installed, inspections are performed prior to startup or asset commissioning to establish a mechanical integrity assessment baseline. All historical design, inspection and testing information is compiled into a condition monitoring database for accurate inspection and data analysis. Through this process, Williams is able to identify assets that require comprehensive engineering assessments for continued safe operations.

As part of the overall Quality Assurance process, Williams audits integrity plans and procedures annually to reflect improvements from external and internal reviews and lessons learned through program implementation and participation in industry trade association committees. Additionally, Williams implements program maintenance through a continuous audit process that assists in annual planning.



Operations Technician Chris Clark at Williams' Oak Grove processing plant in Moundsville, West Virginia.

## **Emergency Preparedness & Public Safety**

### **Emergency Preparedness**

As a responsible member of the communities where we operate, Williams has robust processes in place to prepare for and appropriately respond to a wide range of emergency situations. Our goal is to protect Williams' workforce and the communities surrounding our operations.

The Williams Integrated Management System includes company-wide requirements for implementing midstream and pipeline emergency response procedures. Operating managers are responsible for establishing site-specific emergency plans at our facilities. We evaluate emergency plans annually to confirm the required notification lists, evacuation processes and operating requirements are in place. In 2019, Williams reviewed 33 emergency response plans.

Williams provides employees with annual safety drills and training exercises to prepare for a diverse set of emergencies, including accidental releases and security-related incidents. For example, Williams conducted an emergency response training in South Carolina in 2019 to review communication processes, practice our Incident Management System procedures and gain experience applying Williams' Emergency Plan and Preparedness Manual. More than 50 participants from 13 external organizations participated in the exercise.

We regularly engage with firefighters, emergency management officials, law enforcement officers, public officials and planning agencies to review emergency response procedures and conduct emergency response drills. Williams requires emergency responders to be included in relevant training exercises and drills at least every three years. We provide instructor-led training courses and web-based training programs to emergency responders through our online portal. We also conduct outreach efforts with emergency responders, including in-person meetings, facility tours and informational mailers. In 2019, Williams sent more than 19,900 public awareness mailers to emergency response agencies.

If an emergency incident does occur, we fully investigate the cause to prevent future occurrences. Our remediation management process establishes a standard method for managing post-emergency responses at company sites. By maintaining updated notification lists, Williams can coordinate with local emergency response organizations to effectively communicate necessary information to local communities.

We care greatly about the well-being of the communities where we operate, especially during times of emergency. Through our corporate giving channels, Williams provides financial contributions to support local emergency response teams. In 2019, we collaborated with the Shoshone Paiute Duck Valley Reservation Fire Department to help maintain equipment and replace aging gear. We also make charitable investments to employees and communities affected by natural disasters. Our disaster relief program provides short-term assistance to employees experiencing severe financial need due to a disaster. For more information on community giving, see [page 50](#).

## Public Safety

Engagement with local stakeholders helps us prevent potential safety incidents and reduce third-party damage to pipelines. Williams has ongoing procedures in place to proactively educate the public on pipeline safety. These processes integrate best practices from the Common Ground Alliance, a member-driven association committed to preventing damage to underground infrastructure.


## Williams did not experience any Department of Transportation reportable releases from third-party damages in 2019.

One of the greatest challenges to maintaining safe pipeline operations is accidental damage caused by excavation, construction, farming activities and homeowner maintenance. We design public awareness programs to enhance safety by increasing knowledge of pipeline locations and safety prevention measures. Williams sends an annual public awareness mailer to surrounding landowners and community members detailing the importance of calling "811" at least three days before the start of any digging project so underground utilities can mark their lines. We also send a mailer to farming and ranching communities within 10 miles of our pipelines. We always encourage individuals to contact one of our 24-hour control centers to report abnormal conditions or an emergency at Williams' pipelines and facilities.

Emergency officials, excavators and public officials receive our baseline mailer annually while affected public entities, including schools and farms, receive our baseline mailer biannually. Additionally, we send supplemental mailers frequently depending on the area affected and the types of assets in the area.

Williams' public awareness and damage prevention steering committee oversees the communication and implementation of public awareness and damage prevention initiatives. Our online prevention toolkit provides field personnel with tools, resources and technologies for identifying and preventing line strikes. We update the toolkit regularly as new best practices, lessons learned, or improved tools and technologies become available. In 2019, Williams created a dashboard that communicates trends in near-miss and line-strike data across the company and helps drive consistency in reporting.





Budget and Administration Supervisor Quincy Jones, Operations Manager Ben Kittka and Environmental Specialist Amy Louwers in Canton, Ohio.

# Workforce Health & Development

GRI 102-41; 103-1; 103-2; 103-3; 403-3; 403-6; 404-1; 404-3; 405-1

## Employee Health & Wellness

Our employees are our most valued resource and the driving force behind our reputation as a safe, reliable company that does the right thing, every time. Cultivating a healthy work environment aligns with our Core Values, increases productivity and promotes long-term value creation.

We offer comprehensive programs and services to support the health and wellness of employees during and after work, including robust medical plan benefits, disease management programs and wellness coaching. These benefits are available to most employees regardless of location.

Our Williams Way to Wellness program is a key component of our employee total rewards package. The program is available to employees as well as eligible spouses and domestic partners. As part of the program, we provide annual biometric health screenings and well-being assessments to employees with a focus on assessing overall health and early identification of any possible medical risks. More than 50% of registered employees completed health screenings in 2019, resulting in discounts and incentives on healthcare benefits.

The Way to Wellness program also works to gamify healthy living through annual employee initiatives from physical activity to financial planning. For example, we offer a Real Appeal weight-loss program at no cost to eligible employees, spouses, domestic partners and dependents enrolled in Williams' medical plan. In total, the more than 550 Real Appeal program participants lost a combined 5,173 pounds in 2019.

**The Williams medical plan has experienced a 3% annual cost trend since 2010, enabling monthly medical premiums to remain flat for five of the past seven years.**

We are dedicated to continuously improving health and wellness practices at Williams. We evaluate participation and engagement in existing programs to determine design enhancements and inform communications efforts. We integrate our employee health and wellness activities with our employee safety efforts to leverage the natural synergies between employee health and safety. For information about personnel safety, see [page 32](#).

## Employee Attraction & Retention

Working at Williams isn't just a job, it's an opportunity to impact the quality of people's lives every day by safely delivering products that fuel the clean energy economy. Williams employs more than 4,800 people across the United States. We work to attract and retain the best talent by creating an environment where employees feel fulfilled and supported in their personal and professional development. Our efforts enabled Williams to maintain a low voluntary turnover rate of 6.1% in 2019.

As our company grows, we remain focused on creating a safe, inclusive workplace where employees feel valued and heard. We conduct employee engagement surveys to identify Williams' strengths and weaknesses from our employees' perspectives. The survey results help us evaluate and continuously improve our approach to employee engagement.

### Talent Recruitment

Attracting the best talent in the industry is critical to driving Williams' strategic and operational business results. We leverage various recruiting strategies to hire candidates aligned with our business needs. Our primary recruitment platforms include external job boards and our Williams Careers site. We also offer a Talent Scout Incentive program to broaden Williams' candidate pool through employee referrals.

Williams partners with universities and technical schools in the United States to recruit for entry-level opportunities and paid internships. In 2019, we received more than 1,000 applicants for our summer internship program designed to provide meaningful work and resources to individuals preparing for entry-level disciplines. Williams' 2019 intern class included 46 individuals.

Veterans gain exceptional experience and rigorous technical training through the military, making them ideal candidates for positions at Williams. These skills directly align with our need for adaptability, quick learning, accountability and effective project execution. We strategically recruit military veterans through virtual career fairs, targeted social media campaigns, virtual information sessions and direct partnerships. We recruit veterans for positions at all levels in the organization.



Engineer Steven Wheeler and Commercial Developer Representative Sarah Lederach at the Apex landfill in Amsterdam, Ohio.

Williams sponsors the Disabled America Veterans Guide to Hiring and Retaining Veterans with Disabilities. Based on proven best practices for hiring and retaining veterans, the guide is a map to empower employers to become thought leaders in the veteran employment space. More than 7% of Williams employees in 2019 were veterans. In addition to military leave, Williams provides pay offset by any military pay, and benefits, for up to 12 months of military leave.

### In 2019, more than 7% of Williams employees were veterans.

We value our employees and want to provide internal opportunities for development. When hiring for a position, we also look internally to identify potential candidates. Williams' internal human resources system allows employees to view and apply to all currently posted requisitions. We fill approximately 30% of all open positions from within.

## Employee Benefits

Our employees are our greatest asset and we offer them a leading benefits package. Williams provides a comprehensive total rewards program that includes base salary, an all-employee Annual Incentive program, retirement benefits and a health and wellness program. Our benefits program exceeds the benchmarks for both our segment of the industry and the energy industry as a whole.

Williams provides employees with company-paid life insurance, disability coverage and paid parental leave for both birth and non-birth parents. Additionally, more than 95% of Williams' employees are saving for retirement through our 401(k) plan. Employees receive company-paid retirement benefits regardless of their personal decision to save in our 401(k) plan or not.

We want to recognize and reward our employees who play a critical role in our company's success. Williams' discretionary Annual Incentive program is an important component of our total employee rewards offering. This program offers incentives based on company-wide performance, individual performance and select environmental and safety metrics to drive business results, enhance collaboration and motivate employees.

We believe that, by having a stake in the success of the company, employees will find more opportunities to make Williams stronger. To that end, Williams provides an employee stock purchase plan to purchase company stock at a 15% discount. As of 2019, 42% of employees elected to participate in the program.

Organized labor serves as an important voice advocating for the necessary expansion of domestic energy infrastructure. We have strong relationships with unions in many of our pipeline areas. Williams recognizes the right of employees under the National Labor Relations Act to, among other things, organize, form, join or assist unions and to engage in protected, concerted activities. Williams is dedicated to creating a workplace that respects and values all employees and maintains an environment of open and direct communication. We strive to develop mutually rewarding relationships with our employees through fairness, trust and integrity. Because we encourage a direct partnership with our employees, we do not believe in the need for an outside group to speak on their behalf. In 2019, none of Williams' employees were represented under collective bargaining agreements.

## Employee Development

We recognize our people for their contributions to our success and provide them with a work environment where their careers thrive. Williams offers robust corporate and technical training programs coupled with strong employee engagement to support the professional development of our employees and the long-term value of our business.

Williams provides training opportunities that reflect an employee's position, specific responsibilities and the local regulatory environment. On average, Williams' employees completed 36 hours of compliance and technical training in 2019, in addition to leadership and development training that is not tracked through our learning management system. Field employees typically require more training than office-based personnel due to the nature of the job requirements.

We encourage employees to engage in open dialogue regarding their professional development through ongoing, one-on-one meetings with supervisors and during formal performance reviews. Performance is measured through the achieved results associated with attaining annual business goals, operational and functional area strategies and personal development plans. Additionally, we evaluate observable skills and behaviors based on our defined competencies that contribute to workplace effectiveness and career success.

We are always seeking new opportunities to improve our training programs. In 2019, we continued to enhance our front-line operations training programs with supplemental instructor-led courses, web-based courses and targeted on-the-job training to enrich specific technical skills. We are also in the process of implementing a focused development program for our project management teams in 2020 to deliver foundational information and skills-based knowledge.

### 2019 Employee Training Data

| Employee Category | Average Training Hours |
|-------------------|------------------------|
| Total Workforce   | 36.5                   |
| Office Personnel  | 14.0                   |
| Field Personnel   | 52.3                   |



Williams provides development opportunities for all employees, from recent graduates to senior leadership. Our Early Career Professional Development program enables post-undergraduate employees to participate in an intensive, three-year rotational or non-rotational program to build technical expertise. And, our baseline leadership programs help support current leaders by providing tools and training resources to promote success in their roles.

**100% of employees received a performance assessment in 2019 and nearly 13% of our employees received a promotion.**

In 2019, we piloted a learning and development café event to provide Tulsa-based employees an opportunity to hear about development opportunities from company leaders, including Williams' senior vice president and chief human resources officer.

Williams engages in talent review and succession planning to assess our organizational capability and guarantee ongoing talent capacity. Our Talking Talent program enables us to evaluate talent across the company and calibrate accordingly. Additionally, our Talking Development program provides the opportunity for managers to think strategically about the broader spectrum of development needs and identify themes. Aligning these themes to the strategic priorities of the organization helps ensure that succession and development plans support the growth of individuals and the business. As part of our succession analysis, we look at the demographics of our potential successor pool.

We utilize career transition services to support transitioning individuals through a combination of career coaching, networking, industry-specific job leads, reskilling and upskilling.

#### WILLIAMS WAY SPOTLIGHT

## Seven Core Competencies for Success

In support of Williams' mission, we work to develop a knowledgeable and skilled workforce. We introduced seven core competencies in 2019 that align with our Core Values and reflect the key to success for all Williams employees. By demonstrating these qualities during everyday functions, employees can live out our Core Values and positively contribute to the company culture. The core competencies help describe what is expected from employees, what employees can do to strengthen performance and the key focus areas for professional development at Williams. The seven core competencies also provide employees with insight into the skills needed to advance to higher-level positions.



CUSTOMER FOCUS



ENSURES ACCOUNTABILITY



ACTION ORIENTED



DRIVES RESULTS



COLLABORATES



COMMUNICATES EFFECTIVELY



INSTILLS TRUST

## Diversity & Inclusion

We want all employees to feel respected and valued for their contributions. Williams considers diverse perspectives and backgrounds as a competitive advantage in the marketplace. Through employee education programs and a strong focus on leadership accountability, we are working to embed diversity and inclusion in every part of our organization.

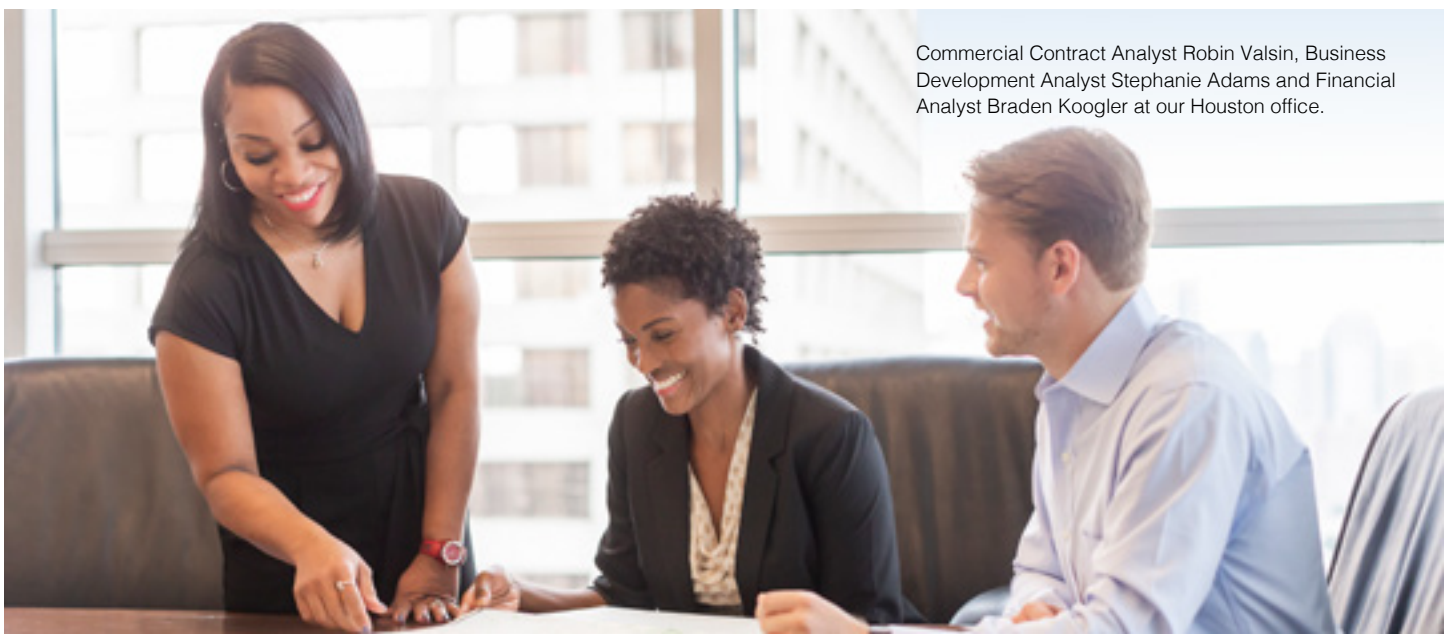
Williams has several policies that reinforce our commitment to an inclusive workplace. Our [Code of Business Conduct](#) includes expectations for creating a positive work environment. Williams' [Equal Employment Opportunity Policy](#) outlines our approach to providing equal employment and advancement opportunities for all. Our [Prohibiting Workplace Discrimination and Harassment Policy](#) defines our commitment to preventing workplace discrimination and harassment. Williams communicates diversity-related policies to employees through our internal intranet site, company-wide communications and team meetings.

Diversity and inclusion fosters innovation and collaboration, brings out the best in our people and drives business success. We believe that every employee contributes to building an inclusive culture. In 2019, all employees completed a new sexual harassment training to promote a workplace of dignity and respect that is free from harassment. We endorse business resource groups at Williams to support networking and professional development opportunities for veterans, women and LGBTQ employees. These groups function in a flexible and responsive way to the changing needs of our organization and our employees.

In 2019, Williams' vice president-general manager of Rockies gathering and processing received the Randy Barnard Leave the Ladder Down Award. This award honors those who serve as a champion of inclusion and reinforce Williams' inclusive culture. The Leave the Ladder Down Award program began in 2008 as a way to recognize leaders who model the Williams Way — treating employees, customers, business partners, shareholders and the communities we serve with respect and dignity.

We strive for diverse representation at all levels through our talent management practices and employee development programs. We are committed to helping all employees elevate into leadership positions in our company by creating a more equitable playing field. We emphasize diversity and inclusion during all development conversations including our Talking Talent Development programs and succession planning initiatives. Through strategic partnerships with organizations such as Catalyst and Women's Energy Network, we are accelerating leadership development and expanding opportunities for diverse employees. In 2019, female or ethnically diverse employees represented nearly 26% of management roles at Williams.

In 2019, Williams participated in Women in the Workplace, a multi-year joint research effort led by McKinsey & Company to conduct the largest comprehensive study of the state of women in corporate America. Williams was one of the 329 participating companies from a variety of industries. As part of this effort, Williams employees were surveyed on their workplace experiences related to topics including gender biases and equal opportunity. The results of the study provide targeted recommendations on how to improve female representation at all levels in the workplace.



Commercial Contract Analyst Robin Valsin, Business Development Analyst Stephanie Adams and Financial Analyst Braden Koogler at our Houston office.

Williams works to cast a wide net of potential employees to make sure we are considering all qualified applicants. We recruit diverse talent through digital platforms and direct outreach. We also partner with universities and technical schools to support education and internship opportunities for diverse students. Examples include our partnership with the University of Oklahoma Multicultural Engineering program and participation in the Oklahoma State University Diversity Breakfast. Williams' 2019 internship program consisted of 34% female and 30% ethnically diverse employees.

Williams received a Human Rights Campaign Foundation's Corporate Equality Index rating of 90 out of 100 in 2020.

Our Early Career Professional Development program provides opportunities for high-performing and high-potential college graduates to obtain full-time, entry-level positions at Williams. The program consistently achieves strong representation across diversity dimensions, helping build a robust pipeline of future talent. For more information on talent attraction at Williams, see [page 40](#).

## Diversity Data

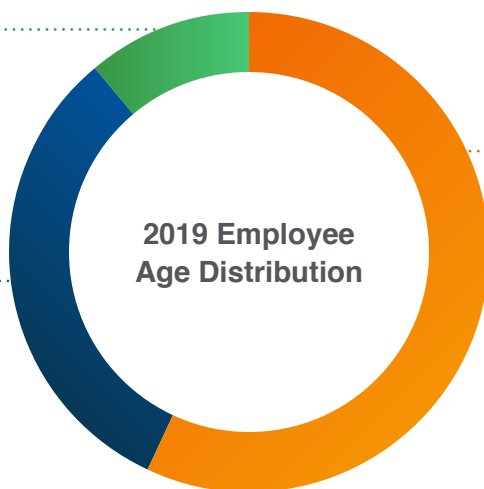
| Employee Category   | 2017  | 2018  | 2019  |
|---|-------|-------|-------|
| Number of Permanent Employees at Year End                     | 5,460 | 5,337 | 4,793 |
| Percent Men   | 79    | 79    | 80    |
| Percent of Men in Technical and Support Roles                 | 52    | 50    | 53    |
| Percent of Men in Professional and Managerial Roles           | 48    | 50    | 47    |
| Percent Women   | 21    | 21    | 20    |
| Percent Women in Technical and Support Roles                  | 35    | 31    | 29    |
| Percent Women in Professional and Managerial Roles            | 65    | 69    | 71    |
| Percent Ethnic Diversity                                      | 16    | 15    | 15    |
| Percent Ethnic Diversity in Technical and Support Roles       | 47    | 41    | 40    |
| Percent Ethnic Diversity in Professional and Managerial Roles | 53    | 59    | 60    |
| Percent of Management Roles Held by a Diverse Population      | 23    | 27    | 26    |
| Percent Men   | 85    | 84    | 84    |
| Percent Women   | 15    | 16    | 16    |

11%

Employees Under  
30 Years Old

32%

Employees Over  
50 Years Old



57%

Employees Between  
30 and 50 Years Old





From left (front row): President and CEO Alan Armstrong, Contract Analyst Ambar Malik, Director of Market Intelligence and Strategy Jaclyn Presnal, Manager of Commercial Development Perrin Boone, Director of Financial Planning and Analysis Teresa Palacios, SVP of Corporate Strategic Development Chad Zamarin, Supervisor of Information Technology Dana Goe, and SVP and General Counsel Lane Wilson. From left (back row): Director of Projects GeJuan Cole, SVP and CFO John Chandler, Coordinator of Maintenance Seth Bandurraga, SVP and CHRO Debbie Cowan, and Director of Operations Briana Schulze. Members not pictured: EVP and Chief Operating Officer Micheal Dunn, Director of Operations Stephen Furbacher, Manager of Projects Missie Hills and Vice President of Rockies Gathering & Processing Candyce Fly Lee.

## WILLIAMS WAY SPOTLIGHT

# Diversity & Inclusion Council

An inclusive culture allows us to attract, develop and retain high-performing employees who are passionate about making Williams a great place to work for all. One part of the overall strategy to enhance our inclusive culture is the creation of a Diversity and Inclusion Council. The council, chaired by our chief executive officer, includes members of the executive officer team, organizational and operational leaders, and individual employees selected via a self-nomination process.

The purpose of the Diversity and Inclusion Council is to promote policies, practices and procedures that support the growth of a high-performing workforce where all individuals can achieve their full potential. The council serves as the governing body over enterprise diversity and inclusion initiatives.



It's our goal to provide a workplace where employees are comfortable bringing their authentic selves to work each day. I'm really proud of Williams' continued focus promoting all aspects of diversity, inclusion and acceptance.



DEBBIE COWAN, CHIEF HUMAN RESOURCES OFFICER AND  
MEMBER OF THE WILLIAMS DIVERSITY AND INCLUSION COUNCIL

# Community Engagement

GRI 103-1; 103-2; 103-3; 411-1

## Community Relations

We strive to sustain positive relationships with the communities where we operate so we can serve as a good neighbor. Our employees work and live in the communities where we operate, so we take great pride in developing strong community relationships. Williams actively engages with a variety of stakeholders, from local business owners and community leaders to public officials and nongovernmental organizations. We employ multiple communication channels to foster open dialogue, including digital platforms, in-person meetings, newsletters and open houses. Our goal is to engage stakeholders throughout the lifecycle of our projects and operations.

Williams upholds a diligent process for receiving, analyzing and responding to community concerns, including a dedicated email address to manage local concerns. Williams employs the Federal Energy Regulatory Commission's (FERC) voluntary pre-filing process to engage affected stakeholders prior to the submittal of a formal project certificate application. Activities include public meetings and consultations with elected officials, community leaders and affected landowners. We followed this process for all FERC projects in 2019.

Williams' community and project outreach team serves as the central contact point for stakeholder engagement efforts related to pipeline projects. The team develops and maintains a project-specific public participation plan for major projects. The plans are implemented using our Public Outreach Strategy Guide, which formally outlines Williams' approach to community engagement and consultation. The guide emphasizes the importance of early contact, continual communication and being flexible whenever possible.

Executive oversight of community engagement falls within the responsibility of our vice president of communications and corporate social responsibility, and the vice president of government affairs and public outreach.

In 2019, we participated in more than 100 stakeholder engagements with local communities, including 50 community events, three open houses, 40 meetings with Native American tribes, seven meetings with chambers of commerce and 32 meetings with county commissioners. We are in the early stages of deploying a new stakeholder management system that will enable Williams to better track interactions with stakeholders, log meeting information and map relevant stakeholders for each of our projects.



Engineer Ogu Laniel volunteers to support local children in Tulsa, Oklahoma.

Our stakeholder engagement initiatives include efforts to help educate community members on Williams' operations. For example, Williams participated in a cross-industry energy learning program in the northeast United States. Members of the program deployed an in-person learning module that provided hundreds of fifth-grade students at more than 12 schools the opportunity to learn about energy while meeting curriculum requirements.

## Landowner Relations

To operate our critical energy infrastructure systems that span 26 states, we must establish permanent easements across private land. It is critically important to maintain successful partnerships with landowners who grant us this privilege. We collaborate with more than 100,000 landowners throughout the United States. We strive to treat landowners fairly by providing them reasonable financial compensation, protecting and restoring their land, and respectfully operating on their property. By building landowner relationships based on mutual trust, Williams is able to deliver value to our investors and clean energy to the people who rely on it.

“ I enjoy our partnership with Williams in the Wamsutter field. The working relationship we have with Williams has become more than a business relationship, and even more than being neighbors. I would call it a friendship. ”

WARREN ADAMS, CATTLE  
RANCHER IN WYOMING

Williams directly and regularly engages with our landowner partners through email, phone calls, open houses and in-person meetings. We abide by the [Interstate Natural Gas Association of America's Commitment to Landowners](#), a set of recommended behaviors that member companies agree to follow when engaging landowners. We also adhere to applicable state regulations such as the Texas Landowner Bill of Rights.

For existing partnerships, we conduct an annual checkup of our assets on landowner properties to confirm that our infrastructure continues to operate safely and unobtrusively. We have ongoing communications with landowners to expeditiously resolve concerns and complaints. For instance, in 2019, the Williams outreach and land team assisted a landowner in Pennsylvania affected by flooding by providing the resources needed to reconstruct a bridge destroyed by the floodwater. This effort was an act of goodwill based on Williams' relationship with the landowner through ongoing outreach.

For proposed pipeline projects, we apply a standardized approach for engaging potentially affected landowners early in the process. Our focus on early engagement enables us to explain the project, obtain permission to survey the land and conduct a formal negotiation process. Williams recognizes that landowners can have concerns related to our projects, including apprehension related to safety, property value and construction impacts. We encourage landowners to ask questions, voice concerns and communicate their preferences so we can create mutually beneficial solutions.

Throughout the project planning process, Williams proactively circulates relevant project information to landowners, including company policies, frequently asked questions and steps for acquiring rights of way. For projects certified by the FERC, Williams is required to notify landowners up to half a mile from the proposed pipeline route. We distribute a brochure developed by the FERC that describes what to expect if a proposed project runs through a landowner's property.

We work to minimize the impact on communities by locating the pipeline along existing rights of way, roadways or other utility corridors. Our corporate philosophy is to introduce eminent domain only as a last resort. We try to reroute when possible to avoid property owners who do not want to work with us. For projects certified by the FERC, we use a federal eminent domain process. As part of this process, Williams maintains a formal landowner complaint resolution procedure to identify concerns and determine an appropriate resolution in a timely manner.



## Indigenous Peoples

Respect for different cultures, traditions and beliefs is ingrained in our company culture. We value our partnerships with Native American tribes and respect the tribal sovereignty of the federally recognized Native American tribes in the United States. Within Williams' areas of operations, there are 143 federally recognized Native American tribes. In 2019, we held 40 meetings with Native American tribes in our areas of operation to support open communication and seek mutually beneficial outcomes.

As part of our commitment to building positive relationships with Native American tribes, we provide meaningful financial contributions to tribal communities.

As a company with interstate natural gas pipelines regulated by the FERC, we adhere to Section 106 of the National Historic Preservation Act. The Act requires consultation on all activities that may affect property of cultural or religious significance to tribes. As part of Section 106, tribes must have a reasonable opportunity to identify concerns about affected properties and to advise Williams on the identification and evaluation of these properties. Williams' public outreach team has primary responsibility for tribal outreach efforts.

We regularly identify opportunities to incorporate feedback from Native American tribes into our project planning. For example, as part of the permit requirements for the North Seattle lateral upgrade project in Washington, Williams agreed to retain all large, woody material from trees felled within 200 feet of all fish-bearing streams along the project right of way. This was a specific request from the Muckleshoot Tribe to improve fish habitat. The modification required a significant amount of planning coordination.

Our [Human Rights Policy and Statement](#) outlines our commitment to respect human rights and avoid complicity in human rights abuses. The statement includes respecting the rights of indigenous peoples. In 2019, Williams had no incidents of violations involving the rights of indigenous peoples.

We donated to several organizations in 2019, including the IllumiNative initiative to support increased education about native peoples in North America, and the Coosawattee Foundation, Inc., to heighten public awareness of the importance of archaeological resources. We also joined a community-led committee at Indian Health Care Resource Center to gain awareness of the needs of the Native American community in our headquarters city. We also supported the Center's first Native American Youth Summit with one of our engineers participating on a science, technology, engineering and math (STEM) education panel and sponsored Native American Day in Tulsa. For more information on community giving at Williams, see [page 50](#).

### WILLIAMS WAY SPOTLIGHT

## Bluestem Pipeline Tribal Outreach

In 2019, Williams began laying the groundwork for the Bluestem Pipeline expansion project that will provide a critical connection to allow Williams to transport natural gas liquids from Conway, Kansas, to Kingfisher, Oklahoma. We have partnered with Targa Resources, which will transport the natural gas liquids to growing markets in Mont Belvieu, Texas. As part of the project planning efforts, Williams' outreach team identified the need for early engagement with Native American tribes in Kansas and Oklahoma. The outreach team sent a letter to the Tribal Historic Preservation Officer of tribes in the potentially affected areas to provide information on the expansion project.

The team also reached out to interested tribes to develop relationships, learn more about the interests of each tribe and discuss the proposed pipeline study area. In total, Williams engaged with 15 tribes in face-to-face meetings, either with a representative group from the tribe or with the governing council of the tribe. This direct engagement helped build trust with the tribes and created an opportunity to identify areas of concern early in the process.

## Local Economic Development

In addition to playing a critical role in a clean energy economy, the abundant supply of natural gas in the United States also supports domestic energy independence. By harnessing this local resource, we can help reduce the country's demand for foreign energy sources, spur local economic development and positively influence global economies.

For example, in 2019, Williams completed the Gateway expansion project — approximately 11 months ahead of schedule — to meet growing demand for clean energy in New Jersey. The project provides the transportation services needed to meet the daily home heating, hot water and cooking needs of an estimated 280,000 homes. The expansion project also guarantees sufficient access to reliable, affordable natural gas to support continued economic growth in the region.

Williams supports economic development in the areas where we operate by creating jobs, investing in civic improvements and working with local service providers. We identify opportunities to improve local economic development through partnerships with local chambers, economic development groups and public officials.

Williams has a long-standing practice of assessing local talent first for all available job positions. Our efforts to hire locally include career fairs, employee referral programs and hiring bonuses in remote areas. We also support technical schools, colleges and universities through partnerships and scholarships to develop a pool of future candidates.

We provide locally hired individuals with opportunities to develop technical and leadership skills that will benefit them throughout their careers. As one of the larger employers in many smaller communities, we are pleased to offer job opportunities to local talent to allow them to stay and prosper in the communities they call home.

In 2019, Williams supported the Newark Workforce Development Board's A.D.E.P.T. Fund in Trenton, New Jersey, to assist with workforce development in the region. The fund provides customized training and career pathways in construction trades and advanced manufacturing for long-term, unemployed workers and residents with significant barriers to employment. Program participants receive at least 80 hours of introductory craft skills training. Upon completion, participants obtain industry-certified credentials for introductory crafts skills training, qualifying them for entry-level employment in the construction industry.

Williams provides local infrastructure investments tailored to address community-specific needs to show our support and commitment to communities. Examples include medical centers, parks, libraries and sports complexes. We continually seek input from local leaders and other economic development entities to better understand the infrastructure needs of local communities. In addition to civic infrastructure improvements, Williams brings economic benefits to local governments through taxes. In 2019, we spent nearly \$168 million in property taxes across our locations. We have contributed more than \$240 million in total Employer Federal Insurance Contribution Act taxes over the past five years.

### WILLIAMS WAY SPOTLIGHT

## Global Economic Development

Just as natural gas helps advance economic development in the United States, increased access to natural gas products can positively affect the global economy. According to The World Bank, nearly half the world lives on less than \$5.50 a day. Expanding access to the energy needed to fuel modern life translates to improved living standards. Around the world, people are being lifted out of poverty and the middle class is growing like never before. As this growth accelerates, so does the demand for modern amenities such as hot water and cooking appliances. Natural gas can help meet this growing demand and improve the quality of life for millions of people.

Increased access to natural gas in developing countries can also benefit human health. An estimated 3 billion people still cook and heat their homes using open fires fueled by polluting kerosene, biomass and coal. Each year, more than 4 million people die from illness attributable to household air pollution. Natural gas is an affordable, clean and reliable source of energy for cooking and heating.

## Community Giving

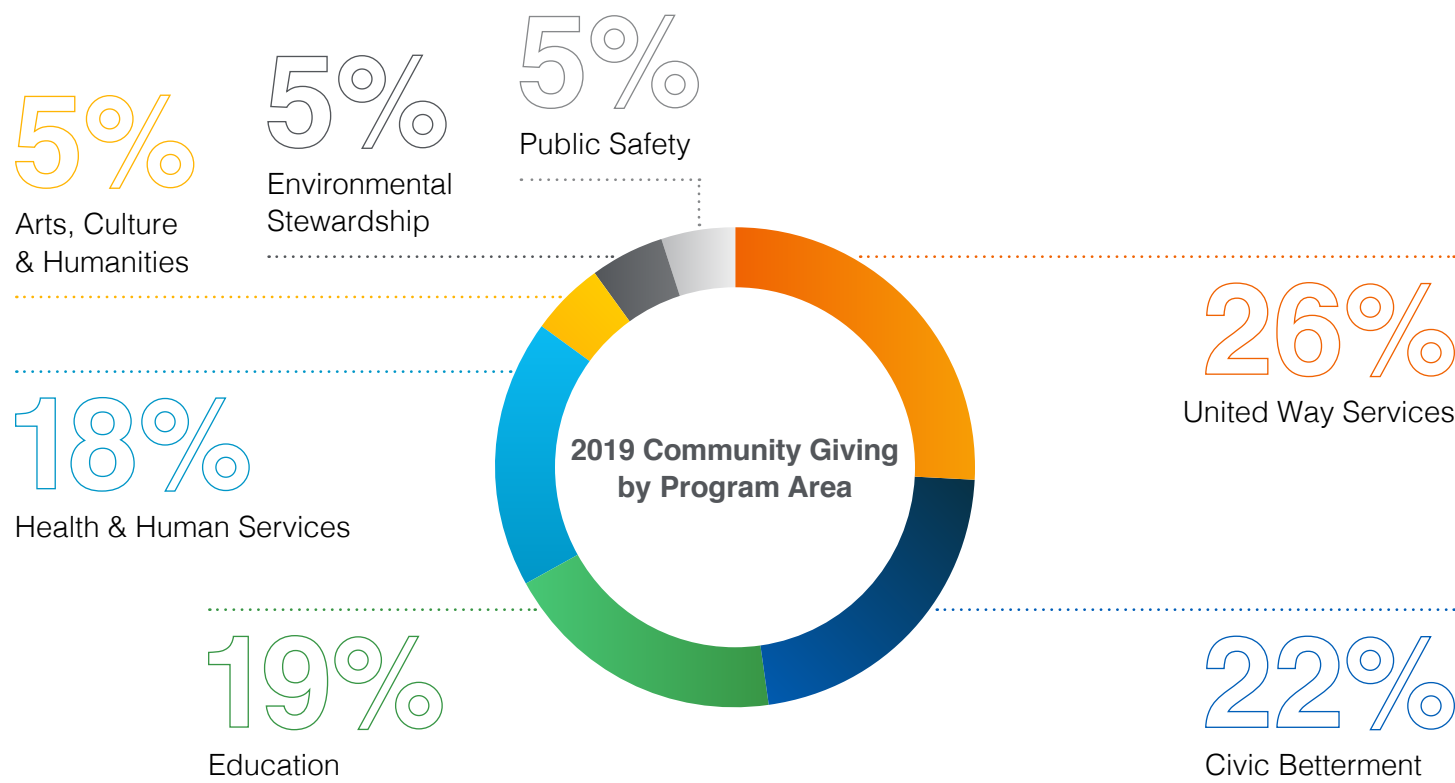
Williams is dedicated to strengthening the communities where we operate through involvement with and support for community activities. The Williams Foundation helps guide our approach to community giving. The Foundation board collaborates with executive leaders and our corporate social responsibility team to develop and approve budgets for supporting specific charitable programs. The Williams Foundation bylaws and charitable contributions standards outline our giving process and safeguard the integrity of our contributions.

### Charitable Contributions

We focus our community giving on initiatives that help energize employees, develop targeted skills and enhance business execution. In 2019, we contributed more than \$9 million to nearly 2,000 organizations through our many channels for community giving, including cash contributions, in-kind donations and matching programs.

Involvement in the communities where our employees live and work is at the heart of Williams. We support several methods of charitable giving aimed at making a difference in local communities through investments in the environment, education, safety, arts and human health. Williams' operating area leaders help identify community investments that best support the specific needs of each community.

In 2019, we continued to focus on efforts related to education. We are committed to helping our local schools prepare the next generation of employees, particularly in the fields of science, technology, engineering and math (STEM). We contributed \$887,633 in support of STEM education in 2019. For example, we supported the STEM Like ME! program in Everett, Washington, which empowers teachers to introduce STEM professionals in the classroom setting, engaging and inspiring students by expanding awareness about STEM industry opportunities.





\$5.1 million contributed to United Way by Williams, its employees, retirees, board members and through fundraisers in 2019.



From left: IT Systems Administrator Ken Slaton, IT Business Systems Analyst Bradley Davis and Corporate Social Responsibility Specialist Sam Swindell in Tulsa, Oklahoma.



## WILLIAMS WAY SPOTLIGHT

# Supporting United Way

Our partnership with United Way is one of the many ways we take a leadership role in driving sustainable change through collaboration with strong community partners. In 2019, we continued our company-wide efforts to support United Way by contributing to more than 180 local area United Way agencies. Employees, board members and retirees receive a dollar-for-dollar match of their contributions up to \$25,000 to United Ways in areas of Williams operations.

For example, in 2019, Williams provided \$25,000 to the Newark Water Fund established by United Way of Essex and West Hudson. The funds were used to purchase bottled water for Newark residents when the city's water supply contained high lead levels.

We are also proud to announce that 2019 also marks the 30th consecutive year that Williams raised more than \$1 million for the Tulsa Area United Way. As one of 125 Global Corporate Leadership companies, our partnership with United Way helps keep us tightly woven into the fabric of communities across the United States.



We take a long-term view and work hard to maintain our reputation as an industry standout and community leader. Strengthening our hometowns through active employee involvement and company investments — while providing clean energy — is at the heart of what we do.



LAURA CREEKMUR, VICE PRESIDENT, COMMUNICATIONS AND CORPORATE SOCIAL RESPONSIBILITY; PRESIDENT OF THE WILLIAMS FOUNDATION



Project Manager Howard Humphrey participates in Williams Day of Caring.



A valued member of the national STEM Funders Network and an active ally of the Tulsa Regional STEM Alliance, Williams exemplifies why cross-sector partnership is so critical. Through their support in aligning great local work with national efforts to improve STEM learning experiences for youth, they are championing the next generation of STEM workers, thinkers and innovators. Williams stands tall both as a great leader within the local community and among corporate foundations.



DR. KATHERINE BIHR, TGR FOUNDATION, A TIGER WOODS CHARITY; 2019 CHAIR, STEM FUNDERS NETWORK

## Employee Participation

Williams believes in generously giving both time and resources to help make a difference. We support volunteer efforts by granting employees time off to volunteer with charitable organizations. Across the country, our employees serve on nonprofit boards and as mentors, coaches, committee members and volunteer firefighters. In 2019, Williams employees volunteered 32,968 hours with charitable organizations, representing more than \$838,000 in value.

To help employees maximize employee contributions to local communities, we fund employee-driven charitable giving programs, including our homegrown giving and matching gifts programs. Our homegrown giving program enables employees to support the unique needs of their local communities through grants designed to support eligible, nonprofit organizations. Williams' matching gifts program annually matches contributions to eligible organizations up to \$10,000 per employee or board member and up to \$5,000 per retiree.



# Supply Chain Management

GRI 102-9; 103-1; 103-2; 103-3

Williams worked with more than 3,400 suppliers across the United States in 2019 to procure the materials, goods and services needed to support our daily operations. Our suppliers directly impact the financial success of our operations, influencing our ability to deliver value to our customers and investors and local communities alike. For that reason, it is imperative that we develop relationships with suppliers that share our commitment to operational excellence and uphold our Core Values.

Williams' [standard contractor language](#) outlines our supplier expectations. Suppliers are obligated to comply with Williams' health and safety requirements, including the policies set forth in our Contractor Safety Handbook. When surveying the market for potential suppliers, we only procure from qualified organizations that meet our safety, compliance and credit requirements. We are in the process of implementing a new supplier qualification process that will enhance how we capture data and enable us to incorporate additional environmental and social criteria as part of the supplier grading process.

For existing suppliers, Williams uses a supplier relationship management process to segment suppliers and develop appropriate management strategies. Through the process, we can identify Tier 1 suppliers with the highest spending, strategic value and potential risks. Tier 1 suppliers represent the top 80% of total spending. We evaluate our Tier 1 suppliers to confirm compliance with company policies and regulatory requirements. Suppliers not meeting our expectations may be subject to contractual remedies, including termination.

In 2019, we realigned our organizational structure to allow for better oversight and influence on spending with environmentally and socially conscious suppliers and contractors. As part of this initiative, we identified opportunities to create policies that standardize and embed environmental, social and governance criteria into our procurement process. Williams is currently developing these policies, and we expect a company-wide rollout of the new policies in 2020.

We make efforts to hire local suppliers to promote economic development in our areas of operation. Our ability to hire locally depends on the availability of appropriately qualified individuals. Additionally, we support suppliers from historically underrepresented groups including women and minorities. In 2021, we will finalize implementation of an enterprise-wide resource planning system that will enhance our process for identifying and collaborating with diverse suppliers.

## Respecting Human Rights

We recognize our responsibility to protect internationally recognized human rights within our own operations and avoid contributing to human rights infringements within our supply chain. Since 1992, Williams has offered the Action Line, a 24/7 toll-free number, which empowers employees and other stakeholders to report concerns, including those related to human rights. Internal procedures are in place for the confidential handling of all concerns made to the Williams Action Line. For more information, see [page 57](#).

Our [Human Rights Policy and Statement](#) outlines our commitment to respect human rights and avoid complicity in human rights abuses. The statement includes our expectations related to workplace discrimination, diversity and inclusion, workplace conditions and freedom of association. Our commitment applies to everyone involved in Williams' operations, including employees, officers, contractors, leased workers, suppliers, vendors and customers. In situations where Williams does not have overall control of operations, we will take reasonable steps to confirm that involved parties follow human rights best practices.

Williams strives to respect human rights through our supply chain by partnering with suppliers that share our corporate values in the areas of freely chosen employment, working hours, respect in the workplace, wages and benefits, and health and safety. Recognizing our responsibility for greater accountability of our suppliers, we are in the process of developing a Supplier Code of Conduct that will hold our suppliers to the same reasonable level of human rights best practices expected from the Williams workforce. Our goal is to launch the Supplier Code of Conduct in 2020.



Pipeline Controller Jerrod Stubblefield and Pipeline System Specialist Marlin Nossman at our controller room in Houston, Texas.





WE MAKE CLEAN ENERGY HAPPEN<sup>SM</sup>

# Governance

We believe it takes more than good business results to be a great company. As Williams delivers the products people rely on for electricity, heating and cooking, we act ethically and with integrity. We actively engage with shareholders to communicate our viewpoints and performance on topics that affect our business results. Our efforts are underpinned by the Williams board of directors.



# Ethics & Integrity

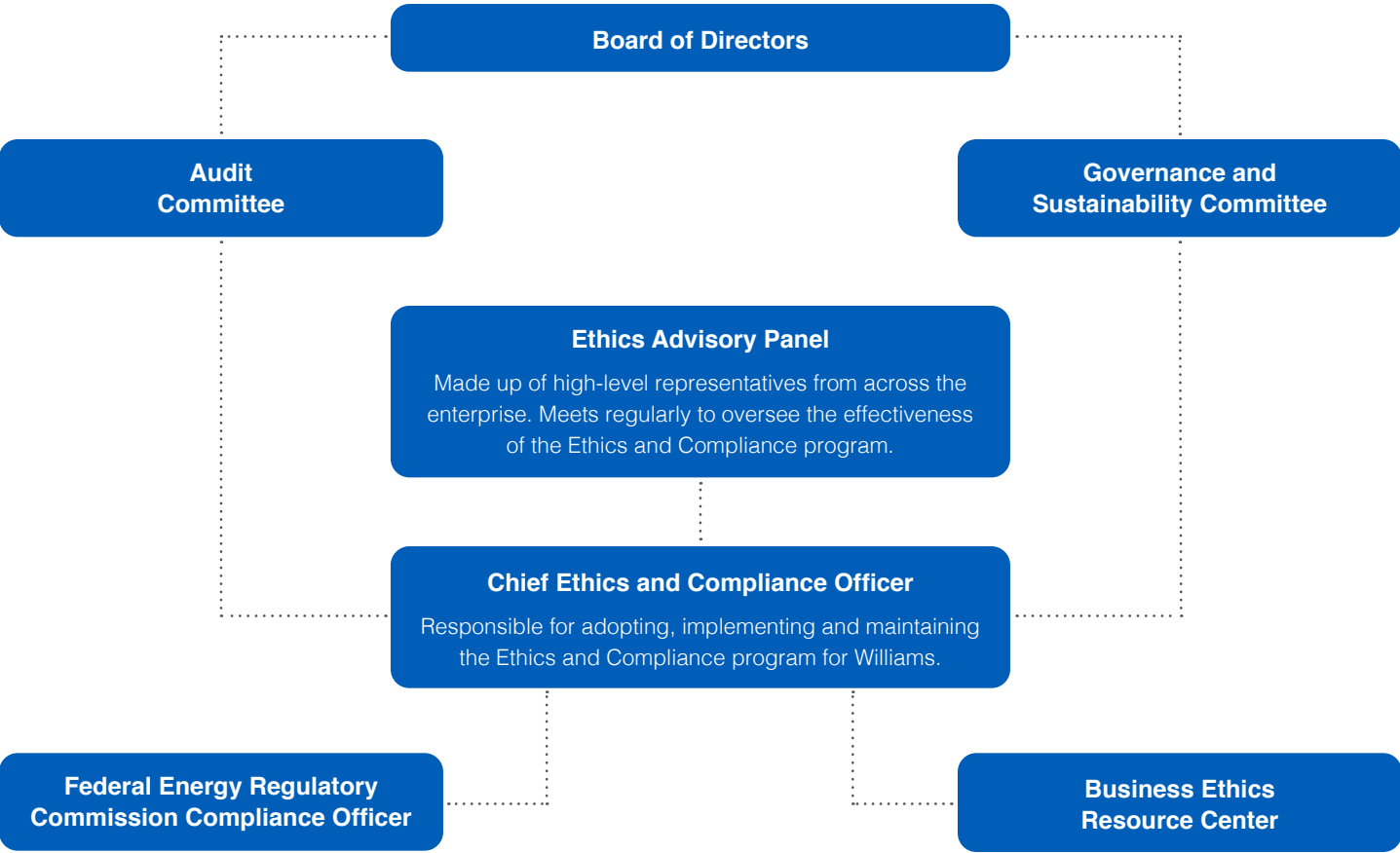
GRI 102-16; 102-17; 103-1; 103-2; 103-3; 206-1

Williams has a long history rooted in ethics and integrity. Our founders, Dave and Miller Williams, set the tone in 1908 as they began a legacy with the motto, “a good job on time.” Today, our commitment to upholding the highest standards of ethics and compliance represents a key driver of our ability to operate a sustainable, profitable company for the long run.

Our Core Values are ingrained in how we do our work every day on behalf of our stakeholders. Acting authentically, safely, reliably and responsibly is the foundation for conducting our business. In 2019, we updated our Core Values to reflect the company’s current priorities and expectations of employees. The Williams board of directors and members of senior management approved the revised Core Values.

The [Code of Business Conduct](#) sets the ethical conduct expectations for officers, directors and employees at all levels. It also applies to Williams subsidiaries and, in certain cases, our joint ventures. Our Code is the primary mechanism guiding our efforts to comply with all laws, avoid conflicts of interest, maintain a safe and inclusive workforce and report ethical concerns. The Code of Business Conduct is our primary mechanism to drive compliance with all laws, avoid conflicts of interest, maintain a safe and inclusive workforce and report ethical concerns. Key topics addressed by our Code of Business Conduct include prohibitions of bribery, corruption and the making of facilitation payments.

## Ethics and Compliance Governance Structure





All employees must annually complete a Code of Business Conduct ethics and compliance training. As part of this computer-based training, employees must acknowledge that they have read and understand the Code of Business Conduct expectations. In addition, senior leadership must complete an 11-question certification to confirm their understanding of Code of Business Conduct expectations. New employees must complete the training within the first 30 days of employment.

## In 2019, 100% of Williams employees completed compliance and ethics training courses.

We strictly prohibit any act of corruption, including bribery, the making of facilitation payments, fraud, extortion, conflicts of interest and the giving or receiving of gifts that are designed to influence the recipient's judgment. The Williams board of directors audit committee has established procedures for the receipt, retention and treatment of complaints regarding accounting, internal accounting controls or auditing matters. Williams was not involved in any pending or completed legal actions, fines or settlements in 2019 regarding bribery, corruption or anti-competitive violations.

The Williams Ethics and Compliance program is designed to effectively communicate and manage key elements of ethics and integrity, including through our Core Values, Code of Business Conduct and guidelines for reporting suspected violations. Williams' chief ethics and compliance officer has oversight responsibility for our Ethics and Compliance program.

The Williams Ethics Advisory panel is tasked with assessing the effectiveness of the Ethics and Compliance program and recommending enhancements as necessary. We incorporate benchmark comparative metrics in our annual assessment as part of the evaluation process. In coordination with the Ethics Advisory panel, internal subject matter experts and internal audit team, we also conduct an annual risk assessment to review compliance with our ethics policies.

## Reporting Violations

We encourage our employees to report suspected violations of any law, regulation or company policy. It is against company policy for employees to engage in or tolerate retaliation or any form of harassment directed against an employee who reports a suspected problem in good faith.

Williams offers several confidential mechanisms for reporting, including the Williams Business Ethics Resource Center, the Williams Action Line and our online ethics mailing address. The Williams Action Line is available to our employees 24 hours a day, seven days a week, and is operated by an independent third party to ensure confidentiality. We proactively communicate these resources through the Williams Ethics and Compliance program and on our internal and external websites.

Williams evaluates all alleged violations of law or company policies to assess the need for and level of investigation. Williams determines the appropriate next steps and, where warranted, takes appropriate corrective action, up to and including dismissal. In 2019, we received 210 concerns through ethics reporting channels. The Williams board of directors receives quarterly reporting regarding the Ethics and Compliance program.

## Number of Inquiries Received Through Ethics Reporting Channels

| Reporting Concerns               | 2017       | 2018       | 2019       |
|----------------------------------|------------|------------|------------|
| Human resources                  | 71         | 74         | 58         |
| Action line                      | 55         | 51         | 32         |
| Management                       | 56         | 40         | 70         |
| Business ethics resources center | 13         | 5          | 6          |
| Other reporting channels         | 20         | 33         | 44         |
| <b>Total</b>                     | <b>215</b> | <b>203</b> | <b>210</b> |

# Board Leadership

GRI 102-18; 102-20; 102-23; 102-24; 102-32; 103-1; 103-2; 103-3; 405-1

Good governance is the foundation of long-term business success. Our board of directors is responsible for establishing broad corporate policies and overseeing overall company performance. Board members are kept informed about the business through discussions with the chief executive officer and other senior officers, regular reports and board and committee meetings. In 2019, the board met seven times.

## Board Structure & Corporate Governance

In 2019, the Williams board of directors consisted of 12 accomplished and capable directors. All the directors are independent with the exception of our president and chief executive officer. At this time, the board's current preferred governance structure is to have an independent director serve as board chair. The board of directors is required to stand for election at our annual meeting of stockholders. Our [Corporate Governance Guidelines](#) serve as a framework for governing the board of directors.

The Williams board has four standing committees: audit; compensation and management development; governance and sustainability; and environmental, health and safety. Each of our board committees is entirely composed of independent directors, and during 2019, no fewer than five independent directors served on each committee. The committees provide updates at each regular board meeting to keep the entire board of directors abreast of pertinent information. For detailed information on each board committee, please see the [board committees and charters](#) page of our website.

We have a board policy limiting the number of public company boards on which a Williams director can serve. Directors are apprised of the policy and our corporate secretary group annually reviews the director's responsibilities to make sure over-boarding does not occur.

The compensation and management development committee oversees the establishment and administration of Williams' compensation programs, including incentive compensation and equity-based plans. Our compensation programs are designed to align with company priorities. For example, safety metrics comprise 10% of the Annual Incentive program targets for all employees, including our executive officers.

In coordination with the full board of directors, the committee works to uphold compensation programs that support the interests of our long-term shareholders. In 2019, more than 96% of the votes cast in the stockholder advisory vote on executive compensation were in favor of the company's executive compensation program. For more details on our executive compensation program, see the [2019 Proxy Statement](#).

In addition to our board structure, our board has adopted other practices to facilitate strong corporate governance. For instance, the board and each of its committees conduct annual evaluations and self-assessments. Non-employee directors meet without management present at each regularly scheduled board meeting. We have a majority vote standard for the election of directors in uncontested elections. Our directors, as well as our officers and other employees, are prohibited from engaging in short sales or hedging transactions in Williams securities.

## Board Selection Process

We value a diverse board of directors that provides a range of viewpoints and perspectives. We seek highly qualified, non-employee candidates with, among other qualities, demonstrated leadership abilities, a reputation for honesty and integrity and a commitment to represent shareholder interests. The governance and sustainability committee is responsible for recommending to the board new directors who reflect an appropriate balance of experience, skills and characteristics.

At each of its regularly scheduled meetings, the governance and sustainability committee evaluates the board's composition to assess if the board has the right mix of skills and experience. As part of its director selection and nominating process, the committee annually assesses the board's diversity in such areas as geography, race, gender, ethnicity and age. We strive to maintain a board of directors with diverse occupational and personal backgrounds. The mandated retirement date for a director is the first annual meeting of stockholders following the director's 75th birthday, unless otherwise voted on and waived.

We have a board policy limiting the number of public company boards on which a Williams director can serve. Directors are apprised of the policy and our corporate secretary group annually reviews the director's responsibilities to make sure over-boarding does not occur.

## Sustainability Oversight

Sustainability topics can arise in the context of all committees and the full board. The governance and sustainability committee has primary responsibility for providing oversight and guidance on environmental, social and governance (ESG) matters. The governance and sustainability committee also receives progress updates on the development of our Sustainability Report during regularly scheduled committee meetings. Building on our commitment to sustainability, in 2019, we renamed our nominating and governance committee to governance and sustainability committee to better reflect the committee's ESG oversight responsibilities.

The environmental, health and safety committee is responsible for reviewing, monitoring and reporting to the full board on the company's environmental, health and safety performance, including reviewing key metrics and reviewing compliance with applicable regulations. Sustainability topics of particular interest to the board of directors in 2019 included safety, environmental issues, human capital and cybersecurity, among others.

Responsibility and oversight of ESG topics does not end with the board. Williams has processes in place to make sure that accountability for ESG performance cascades across the organization. Williams' environmental, social and governance director is responsible for developing and executing our ESG integration strategy and engaging with Williams' shareholders to understand ESG expectations and communicate our performance. Our sustainability steering committee is a designated leadership team tasked with supporting the development of Williams' sustainability communications and implementing operational initiatives across the business.

## Risk Management

The board of directors is responsible for oversight and guidance on organizational planning, strategy and risk management. As part of this effort, the board participates in an annual strategy session positioned to evaluate Williams' long-term strategy, including top risks that could affect the execution of the company's strategy.

Williams' top risks are identified during an annual strategic risk assessment process conducted by the strategy team with input from senior leaders. For each top risk, a tolerance is defined and a risk alignment rating is assigned. The risks may directly or indirectly correspond with sustainability topics for the company. Results from the strategic risk assessment are presented to the board of directors during the annual strategy session.

### WILLIAMS WAY SPOTLIGHT

## Recognition for Female Board Representation

The nonprofit organization, [2020 Women on Boards](#), recognized Williams for having a board of directors composed of 25% women. Senior Vice President and Chief Human Resources Officer Debbie Cowan accepted the award on behalf of Williams in Oklahoma City in November 2019. 2020 Women on Boards is a grassroots campaign supported by individuals, organizations and companies that embrace the principle that diversity in the boardroom encourages good corporate decisions. The organization's mission is to help raise the percentage of women who serve on corporate boards in the United States to 20% or greater by 2020.



# Shareholder Relations

GRI 103-1; 103-2; 103-3

Shareholders depend on our track record of safe, reliable operations that deliver long-term, stable returns. Running a sustainable business is an expected behavior at Williams. We have proven experience working with regulators, policymakers and stakeholders to minimize risk in order to build the critical infrastructure needed to fuel our clean energy economy.



Environmental Specialist Barry Mahar, Field Office Administrator Sue Conner and Liaison Project Manager Mark Machalek in Wysox, Pennsylvania.

We actively engage with shareholders to communicate our viewpoints and performance on topics that influence our business results. Williams' corporate governance policies and activities are designed to provide our shareholders with company information that is accurate, timely and meaningful. We are committed to providing our investors an attractive return over the long term.

Our dialogue with shareholders allows us to address issues, share relevant information and align on facts. In 2019, members of our executive management team attended 15 investor conferences, 13 on-site investor meetings and two non-deal roadshows. We host an annual Williams analyst day, during which Williams management gives in-depth presentations covering all the company's businesses.

We provide our shareholders several outlets for communicating with Williams. We host an earnings webcast and conference call each quarter, which enables our executive management team to respond to questions regarding both historical results and forward-looking information. Our dedicated investor relations group receives and responds to shareholder telephone calls, emails and other communications. Shareholders can also communicate directly with our board of directors by contacting our corporate secretary or the board chair. In 2019, we made efforts to modernize and streamline the [Williams investor relations webpage](#) to strengthen how we deliver online communications to shareholders.

Sustainability topics continue to be a focus for many of our investors. Williams recognizes that ESG matters can significantly affect a public company's long-term financial value. We publish an annual Sustainability Report to provide investors with transparency related to our ESG performance. Williams also responds to the CDP climate change questionnaire to disclose decision-useful information for shareholders related to climate change.

In 2019, we engaged several of our largest active and passive shareholders, representing an estimated 15% of shares outstanding, to request feedback on our ESG reporting. Based on this feedback, we took steps to increase the comparability of Williams' performance relative to industry peers by aligning our reporting with the Sustainable Accounting Standards Board's (SASB) industry standards. For more information on our alignment with SASB, please see [page 72](#).

At Williams, we understand our responsibility to our shareholders, and we continually seek opportunities to improve our engagement strategies. In 2019, Williams worked with a third party to conduct an investor perception study that included in-depth interviews with more than 30 investors and analysts. The results of the study will influence how we manage shareholder relations in 2020.

# Government Relations

GRI 102-13; 103-1; 103-2; 103-3; 415-1

Government policies at the federal, state and local level impact Williams' existing operations and future project plans. Continued company growth is dependent on government support for energy infrastructure expansion in North America. Williams works with government stakeholders and regulatory agencies on topics related to Williams' operations and policies that can affect company priorities. In 2019, we engaged on a variety of issues, including energy infrastructure, pipeline project permitting, pipeline safety and tax policies.

Our government affairs and outreach team has primary responsibility for engaging policymakers and other government stakeholders on our projects and policy positions. In 2019, the team continued proactive outreach and education at all levels of government, including close collaboration with local government stakeholders to discuss our project work and address questions and concerns. Williams is in the process of updating our stakeholder management system to enhance engagement with individuals through newsletters and other corporate communications. The new system will also allow Williams to better track support for company initiatives.



Having had the pleasure of engaging Williams' personnel from support staff to the CEO, I have been impressed with the company's leadership in collaborating with key stakeholders to identify solutions that meet shared clean energy goals. At an energy conference, I observed Williams' CEO taking the time to thoughtfully engage with individual landowners and stakeholders about ways to improve community engagement and project development. It was refreshing to see.



COLETTE D. HONORABLE, FORMER COMMISSIONER, FEDERAL ENERGY REGULATORY COMMISSION; PARTNER AT REED SMITH LLP



Williams President and Chief Executive Officer, Alan Armstrong, participating on a Bipartisan Policy Center webcast on America's Energy Infrastructure.



Williams' Fort Lupton  
gas plant in Colorado.

## Trade Associations

Williams belongs to a number of trade associations at the national, state and local levels. Active membership in trade associations helps us amplify the industry voice and collectively work on public policy priorities. We serve as board members, participate in technical and public policy committees, and support advocacy and public education efforts. The primary trade associations we engage with include the following:

- American Petroleum Institute
- American Society of Mechanical Engineers
- American Society of Safety Engineers
- Association of Oil Pipelines
- GPA Midstream
- Interstate Natural Gas Association of America
- Marcellus Shale Coalition
- National Petroleum Council
- National Society of Professional Engineers
- Northwest Gas Association
- Southern Gas Association
- Tulsa Regional Chamber of Commerce

One example of our engagement with trade associations was our work in 2019 with the Marcellus Shale Coalition, West Virginia Oil and Natural Gas Association and Ohio Oil and Gas Association. During the endeavor, we provided in-depth information to policymakers, regulators and other public stakeholders in Pennsylvania, West Virginia and Ohio on the positive impacts responsible natural gas production is having on local communities in these areas.

The trade associations that we engage with have varied positions on key public policy issues that are often, but not always, aligned with those of Williams. Williams discloses all expenditures of corporate funds to these associations used for nondeductible lobbying and political expenditures on our [website](#).

## Political Contributions

Williams makes political contributions that support the advancement of the company's interests and those of our industry. When Williams contributes to candidate campaigns, our legal department reviews to confirm adherence with applicable laws and regulations. Additionally, the governance and sustainability committee of the board of directors annually reviews the company's political contributions.

WILLCO PAC, Williams' political action committee, was created in 1985 and is a nonprofit committee registered with the Federal Election Commission. WILLCO PAC is an independent, nonpartisan entity that raises contributions from eligible Williams employees to support candidates for congressional and state offices where permitted by law. Employee participation in WILLCO PAC is strictly voluntary.

WILLCO PAC giving and corporate political giving include bipartisan contributions to federal and state campaign committees and candidates for elected office. In 2019, Williams' corporate political contributions included \$50,000 in total disbursements to the Democratic Governors Association; \$63,950 in corporate political contributions in Maryland, South Carolina and Virginia; and \$38,100 to various state-level candidates and organizations.

We are fully compliant with all lobby registration requirements and verify that our contract lobbyists are in compliance. Williams' federal disclosures for our lobbying activities are available on our [website](#), including the company's aggregate spending for lobbying and payments to lobby service providers.



# Cybersecurity

GRI 103-1; 103-2; 103-3

Cyberattacks can result in physical harm, financial losses and reputation damage. We are committed to protecting Williams' facilities, operations and business-critical information to preserve stakeholder trust and promote the long-term sustainability of our business. Williams implements preventive measures, company-wide policies and training courses to avert unauthorized access to our physical locations and computerized systems. In 2019, we blocked nearly 125,000 emails, internet access attempts and malicious actions.

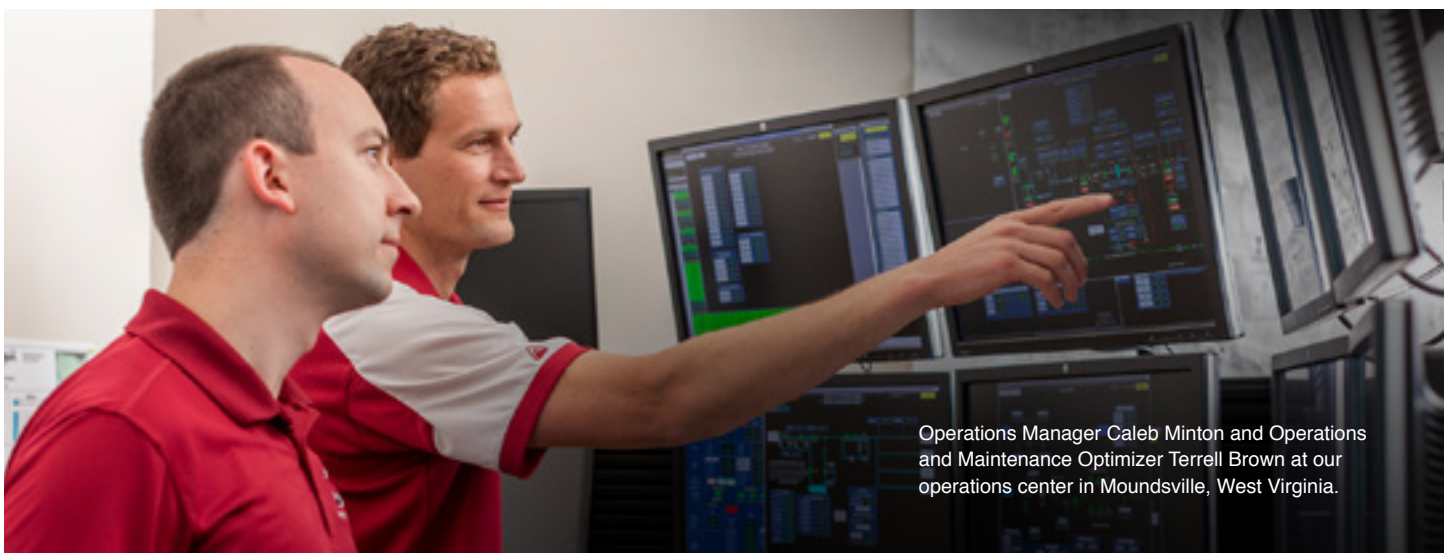
Williams has several policies in place related to cybersecurity, from data classification and protection to password management. Our Cybersecurity Incident Response Policy provides a structured and systematic process for managing incidents that can affect Williams and any applicable third parties. The policy includes step-by-step guidelines for establishing a timely, consistent response to mitigate the effects of any security incidents on our customers, partners and employees.

Our cybersecurity awareness and training standard helps ensure that all employees, contractors and vendors are aware of cybersecurity risks. In 2019, 99.4% of our employees completed cybersecurity training to reduce risk exposure. We also deploy simulated phishing emails to practice identifying and responding to email attacks. Employees or contractors who fail a phishing email test are required to complete additional training. Because of these efforts, we successfully reduced the number of unsuccessful phishing tests by 50% in 2019.

Williams supplements training programs with awareness initiatives that call attention to cybersecurity through posters, presentations, newsletters and events. For the past five years, Williams has hosted a Know Williams event during national Cybersecurity Awareness Month to inform employees about the different types of cybersecurity risks. In 2019, we created an Escape Room activity that gave employees an opportunity to learn valuable principles about cybersecurity in a fun, team setting.

Our commitment to mitigating cybersecurity risks extends to all levels of the organization, from facility personnel to the board of directors. We develop a quarterly Cybersecurity Board Report to communicate our performance and any identified risks to the board of directors. In 2019, we developed an executive-level steering committee to provide additional oversight on Williams' cybersecurity initiatives.

We conduct regular internal audits and risk strategy sessions to assess cybersecurity threats and respond accordingly. To complement this effort, Williams contracts with a third party to evaluate our corporate and operations networks. We remain focused on continuously improving our approach to managing cybersecurity. In 2019, we developed a maturity benchmark to better evaluate our performance.



Operations Manager Caleb Minton and Operations and Maintenance Optimizer Terrell Brown at our operations center in Moundsville, West Virginia.



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# Appendix





Business Analyst Lola Boja (retired), Project Manager Chris Pisanelli, Operations Supervisor Jake Burnett, Construction Analyst Kristen Hennings, and Safety and Health Specialist Scott Golden in Canton, Ohio.



# Performance Data Table

SASB EM-MD-110a.1; EM-MD-110a.2; EM-MD-120a.1; EM-MD-520a.1; EM-MD-540a.1; EM-MD-540a.2; EM-MD-000.A and GRI 206-1; 304-4; 305-1; 305-2; 305-7; 307-1; 403-9; 404-1; 404-3; 405-1; 411-1; 415-1

| Metric   | 2015 | 2016   | 2017   | 2018   | 2019   |
|--|------|--------|--------|--------|--------|
| <b>Environment</b>   |      |        |        |        |        |
| Scope 1 greenhouse gas emissions CO <sub>2</sub> e, million metric tons /A/ <sup>1</sup>       | N/A  | 13.27  | 12.24  | 10.70  | 11.18  |
| CO <sub>2</sub> (excluding emissions from exported power and heat)                             | N/A  | 11.45  | 10.38  | 9.06   | 9.47   |
| Methane (CO <sub>2</sub> -equivalent)  | N/A  | 1.81   | 1.85   | 1.64   | 1.70   |
| N <sub>2</sub> O (CO <sub>2</sub> -equivalent)   | N/A  | 0.0042 | 0.0034 | 0.0031 | 0.0035 |
| Scope 1 greenhouse gas emissions CO <sub>2</sub> e, percent methane <sup>1</sup>               | N/A  | 14     | 15     | 15     | 15     |
| Carbon emissions intensity, Scope 1 CO <sub>2</sub> e/million USD revenue <sup>2</sup>         | N/A  | 1,769  | 1,524  | 1,232  | 1,363  |
| ONE Future methane intensity, percent gathering and boosting <sup>3</sup>                      | N/A  | N/A    | N/A    | 0.043  | 0.035  |
| ONE Future methane intensity, percent processing <sup>3</sup>                                  | N/A  | N/A    | N/A    | 0.020  | 0.017  |
| ONE Future methane intensity, percent transmission and underground storage <sup>3</sup>        | N/A  | N/A    | N/A    | 0.031  | 0.032  |
| Scope 2 greenhouse gas emissions CO <sub>2</sub> e, million metric tons /A/ <sup>4</sup>       | N/A  | N/A    | N/A    | 1.10   | 1.47   |
| Sum of Scope 1 and Scope 2 greenhouse gas emissions CO <sub>2</sub> e, million metric tons /A/ | N/A  | N/A    | N/A    | 11.80  | 12.65  |
| Energy use, billion kilowatt-hours <sup>5</sup>  | N/A  | N/A    | N/A    | 2.204  | 3.233  |
| Gas flaring, thousands of metric tons <sup>6</sup>   | N/A  | N/A    | N/A    | N/A    | 130.60 |

<sup>1</sup>Gross direct (Scope 1) greenhouse gas emissions in millions of metric tons of CO<sub>2</sub>-equivalent. The consolidation approach is operational control and includes CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O. Emissions are based on calendar years and are calculated using the U.S. Environmental Protection Agency Mandatory Greenhouse Gas Reporting Rule methodology for all assets that Williams owned and operated by December 31 of the calendar year, and adding the additional methane sources covered under ONE Future for 2018 and 2019 only. Data excludes emissions from offshore assets, corporate office buildings and company vehicles. Global Warming Potential rates are 25 for CH<sub>4</sub> and 298 for N<sub>2</sub>O. No Williams facilities are covered by emissions limiting regulations. Williams does not produce biogenic emissions from its direct operations. Data is restated from 2016–2018 from the previous year's report if corrections or methodology changes resulted in a change greater than 10,000 metric tons.

<sup>2</sup>Gross direct (Scope 1) greenhouse gas emissions in metric tons of CO<sub>2</sub>-equivalent, divided by total revenue in million USD. Includes CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O.

<sup>3</sup>The methane emissions intensity is by Williams' segment, and is calculated in accordance with the ONE Future methodology. Units are mass of methane emitted per mass of methane throughput. Intensity is based on company-specific methane throughput and is not adjusted to gross production.

<sup>4</sup>Gross location-based energy indirect (Scope 2) greenhouse gas emissions in millions of metric tons of CO<sub>2</sub>-equivalent. The consolidation approach is operational control. 2019 emissions were calculated using U.S. Environmental Protection Agency Power Profiler Emissions Tool 2018, using emission factors from U.S. Environmental Protection Agency eGRID2018 multiplied by kWh energy use for all assets that Williams owns and operates. Emissions in 2018 were calculated using the eGRID2016, which was the tool available at time of calculation and more representative of the emissions factors at the time. Corporate building energy use is excluded.

<sup>5</sup>Figure represents Williams owned and operated assets, excludes corporate offices. Increased purchased power use from 2018 to 2019 is partly a result of the purchase of the UEO plants in Ohio, as well as new electric gas compression stations beginning operation.

<sup>6</sup>Metric tons of waste gas routed to a flare, thousands.

/A/ indicates data assured by ERM CVS.

| Metric   | 2015    | 2016    | 2017    | 2018    | 2019   |
|--|---------|---------|---------|---------|--------|
| Sulfur dioxide (SO <sub>2</sub> ) emitted, tons <sup>7</sup>   | 696     | 695     | 671     | 488     | 425    |
| Nitrogen oxides (NOx) emitted, tons <sup>7</sup>   | 31,372  | 29,408  | 30,696  | 29,697  | 32,196 |
| Volatile organic compounds (VOCs) emitted, tons <sup>7</sup>   | 14,334  | 14,213  | 13,173  | 9,353   | 9,208  |
| Persistent organic pollutants emitted, tons <sup>8</sup>   | 0       | 0       | 0       | 0       | 0      |
| Hazardous air pollutants emitted, tons <sup>8</sup>  | N/A     | N/A     | N/A     | N/A     | 2,655  |
| Particulate matter emitted, tons <sup>8</sup>  | N/A     | N/A     | N/A     | N/A     | 1,156  |
| Nitrogen oxides emission intensity, kg/million USD revenue <sup>9</sup>  | 3,867   | 3,558   | 3,467   | 3,102   | 3,561  |
| Sulfur dioxides emission intensity, kg/million USD revenue <sup>9</sup>  | 86      | 84      | 76      | 51      | 47     |
| Volatile organic compounds emission intensity, kg/million USD revenue <sup>9</sup>   | 1,767   | 1,719   | 1,488   | 977     | 1,019  |
| Number of reportable spills and releases <sup>10</sup>   | 183     | 129     | 139     | 92      | 55     |
| Volume of reportable spills to soil or water, thousands of barrels <sup>10</sup>   | N/A     | N/A     | 1,570   | 1,090   | 0,317  |
| Number of reportable spills to soil or water <sup>10</sup>   | N/A     | 49      | 78      | 44      | 27     |
| Number of hydrocarbon spills > 1 bbl. <sup>11</sup>  | N/A     | N/A     | 28      | 15      | 8      |
| Volume of hydrocarbon spills > 1 bbl., thousands of barrels <sup>11</sup>  | N/A     | N/A     | 1,030   | 0,698   | 0,068  |
| Volume of hydrocarbon spills > 1 bbl. in Arctic environments, thousands of barrels <sup>11</sup>                                     | 0       | 0       | 0       | 0       | 0      |
| Number of environmental-related notices of noncompliance   | 37      | 15      | 45      | 26      | 18     |
| Spending on environmental penalties and fines, dollars   | 171,847 | 638,642 | 299,891 | 351,150 | 98,639 |
| Environmental accrual for remediation, millions of dollars <sup>12</sup>   | 39.2    | 41.5    | 39.5    | 36.7    | 33.5   |
| Number of active remediation sites managed by Williams   | N/A     | N/A     | N/A     | 75      | 110    |
| Terrestrial acreage disturbed, acres <sup>13</sup>   | N/A     | N/A     | N/A     | N/A     | 24,132 |
| Percent of land owned, leased, or operated within areas of protected conservation status or endangered species habitat <sup>14</sup> | N/A     | N/A     | N/A     | N/A     | 51     |

<sup>7</sup>Emissions are calculated according to permit requirements. If no annual emissions inventory or rolling 12-month emissions recordkeeping is required, the facilities' permitted potential to emit was used in its place. Sulfur dioxide emissions data excludes nitrogen oxides.

<sup>8</sup>Emissions are calculated according to permit requirements. If no annual emissions inventory or rolling 12-month emissions recordkeeping is required, the facilities' permitted potential to emit was used in its place.

<sup>9</sup>Emissions are calculated according to permit requirements, normalized by dollars of revenue. If no annual emissions inventory or rolling 12-month emissions recordkeeping is required, the facilities' permitted potential to emit was used in its place.

<sup>10</sup>Agency reportable is defined as requiring reporting to federal, state or local agency.

<sup>11</sup>Spills include reportable spills only, greater than 1 barrel, containing hydrocarbons. Williams has no operations in the Arctic.

<sup>12</sup>Accrued liabilities related to environmental cleanup, remediation and monitoring activities.

<sup>13</sup>Land disturbed total is calculated using total owned acreage for aboveground facilities. Rights of way are assumed to be restored according to federal, state, and other agency requirements post construction.

<sup>14</sup>Percentage includes aboveground facilities and pipeline rights of way that are assumed to be 50 ft wide. "In" or "near" are defined as within 5 km of the boundary of an area that is protected conservation status or an endangered species habitat. GIS layers used include WDPA and federally listed areas of biodiversity importance including FWS critical habitat, FWS national wildlife refuge, and endangered species habitat. Only 10% of aboveground facilities are in or near these protected or endangered areas.

| Metric   | 2015 | 2016 | 2017 | 2018 | 2019 |
|--|------|------|------|------|------|
| Number of International Union for Conservation of Nature (IUCN) Red List Species in Williams' areas of operation <sup>15</sup> | N/A  | N/A  | N/A  | 140  | 155  |
| Critically endangered  | N/A  | N/A  | N/A  | 26   | 28   |
| Endangered   | N/A  | N/A  | N/A  | 42   | 47   |
| Vulnerable   | N/A  | N/A  | N/A  | 30   | 34   |
| Near threatened  | N/A  | N/A  | N/A  | 12   | 16   |
| Least concern  | N/A  | N/A  | N/A  | 30   | 30   |

## Social

|   |      |       |      |      |      |
|---|------|-------|------|------|------|
| Community investments, millions of dollars <sup>16</sup>                                  | 11.7 | 11.2  | 10.7 | 10.2 | 9.7  |
| Total cash donations  | 11.2 | 11.0  | 10.3 | 10.0 | 9.6  |
| Value of in-kind donations  | 0.53 | 0.24  | 0.40 | 0.17 | 0.12 |
| Value of time contributed by employees  | 0.49 | 0.35  | 0.26 | 0.66 | 0.84 |
| Incidents of violations involving the rights of Indigenous Peoples                        | N/A  | N/A   | N/A  | 0    | 0    |
| Lost-time incident rate (LTIR) per 200,000 work hours — employees /A/ <sup>17, 18</sup>   | 0.17 | 0.35  | 0.26 | 0.25 | 0.06 |
| Lost-time incident rate (LTIR) per 200,000 work hours — contractors <sup>17, 18</sup>     | N/A  | N/A   | N/A  | N/A  | 0.09 |
| Total recordable incident rate (TRIR) per 200,000 work hours — employees /A/              | 0.83 | 1.07  | 1.09 | 0.81 | 0.55 |
| Total recordable incident rate (TRIR) per 200,000 work hours — contractors <sup>18</sup>  | N/A  | N/A   | N/A  | N/A  | 0.83 |
| Number of contractor recordable accidents <sup>18</sup>                                   | N/A  | N/A   | N/A  | N/A  | 46   |
| Number of days away, restricted or transferred (DART) <sup>19</sup>                       | 613  | 1,598 | 696  | 985  | 488  |
| Rate of days away, restricted or transferred (DART) <sup>20</sup>                         | 0.26 | 0.44  | 0.42 | 0.35 | 0.18 |
| Number of high-consequence work-related injuries — employees <sup>21</sup>                | 0    | 2     | 0    | 3    | 0    |
| Number of high-consequence work-related injuries — non-employee workers <sup>18, 21</sup> | 0    | 0     | 0    | 0    | 0    |

<sup>15</sup>Data collected using the U.S. Fish and Wildlife Service's Information for Planning and Consultation online tool.

<sup>16</sup>2018 community investment data restated in 2019 to include Atlantic Sunrise environmental stewardship grant payments.

<sup>17</sup>Incidents include both injuries and illnesses.

<sup>18</sup>Contractors are employed by a third-party company that provides specific services to Williams pursuant to an agreement under which the third-party company retains the right to control the means and manner of achieving the contracted-for services. Non-employee workers are generally workers employed by a third-party company temporary services agency. These workers are commonly engaged on an individual basis through a temporary agency to provide limited services to Williams on a short-term basis.

<sup>19</sup>DART numbers listed include employee and non-employee days away, restricted and transferred.

<sup>20</sup>DART rate includes employee and non-employee days away, restricted and transferred.

<sup>21</sup>Data calculated based on 200,000 hours worked. Excludes fatalities.



| Metric  | 2015       | 2016       | 2017      | 2018       | 2019       |
|---|------------|------------|-----------|------------|------------|
| Rate of high-consequence work-related injuries — employees <sup>21</sup>                      | 0          | 0.04       | 0         | 0.06       | 0          |
| Rate of high-consequence work-related injuries — non-employee workers <sup>18, 21</sup>       | 0          | 0          | 0         | 0          | 0          |
| Number of recordable work-related injuries — employees <sup>22</sup>                          | 53         | 55         | 55        | 45         | 29         |
| Number of recordable work-related injuries — non-employee workers <sup>18, 22</sup>           | 0          | 2          | 0         | 0          | 0          |
| Rate of recordable work-related injuries — employees <sup>22</sup>                            | 0.88       | 1.10       | 1.15      | 0.87       | 0.57       |
| Rate of recordable work-related injuries — non-employee workers <sup>18, 22</sup>             | 0          | 1.63       | 0         | 0          | 0          |
| Number of fatalities — employees /A/  | 0          | 1          | 0         | 0          | 0          |
| Employee fatality rate per 1,000 employees /A/  | 0          | 0.18       | 0         | 0          | 0          |
| Employee fatality rate per 200,000 work hours /A/   | 0          | 0.02       | 0         | 0          | 0          |
| Number of fatalities — contractors <sup>18</sup>  | 4          | 0          | 1         | 0          | 0          |
| Non-employee worker fatality rate per 200,000 work hours <sup>18</sup>                        | 0          | 0          | 0         | 0          | 0          |
| Number of fatalities — third-party <sup>23</sup>  | 0          | 0          | 0         | 0          | 0          |
| Number of fatalities — non-employee workers /A/ <sup>18</sup>                                 | 0          | 0          | 0         | 0          | 0          |
| Number of hours worked — employees /A/  | 12,102,461 | 10,024,823 | 9,538,142 | 10,307,130 | 10,243,612 |
| Number of hours worked — non-employee workers <sup>18</sup>                                   | N/A        | 244,690    | 339,831   | 327,882    | 306,112    |
| Preventable motor vehicle accident rate per 1,000,000 miles — employees <sup>24</sup>         | 2.59       | 2.32       | 2.34      | 1.90       | 2.13       |
| Number of Tier 1 process safety events <sup>25</sup>  | N/A        | N/A        | 57        | 29         | 16         |
| Number of Department of Transportation reportable releases as a result of third-party damages | 1          | 0          | 1         | 0          | 0          |
| Number of reportable pipeline incidents   | 3          | 4          | 15        | 4          | 10         |
| Percent of reportable pipeline incidents considered significant                               | 100        | 50         | 60        | 50         | 40         |
| Miles of natural gas and hazardous liquid pipelines inspected                                 | 1,268.9    | 2,118.3    | 3,027.4   | 3,728.0    | 3,271.5    |
| Percent of natural gas and hazardous liquid pipelines inspected                               | 7.0        | 11.8       | 16.1      | 19.7       | 17.8       |
| Number of new-hire employees  | 582        | 215        | 578       | 583        | 389        |
| Voluntary turnover rate <sup>26</sup>   | 5.8        | 7.0        | 6.4       | 6.1        | 6.1        |

<sup>22</sup>Data calculated based on 200,000 hours worked. Includes fatalities.

<sup>23</sup>Third-party fatalities are those that are not employees, contractors, or non-employee workers who have died on a company site or on a company facility or as a result of a company's operations.

<sup>24</sup>A preventable incident is one in which the driver failed to do everything reasonable to avoid the incident and could include: backing, hitting a fixed object, rear-ending a vehicle, striking a pedestrian, misjudging available clearance, not driving at a speed consistent with the existing conditions of the road, weather, traffic or sight distance.

<sup>25</sup>Data based on API RP 754 guidance.

<sup>26</sup>Data includes employees voluntarily terminating from Williams, excluding any impacts from non-recurring programs or offerings.

| Metric   | 2015  | 2016  | 2017  | 2018  | 2019  |
|--|-------|-------|-------|-------|-------|
| Total number of temporary employees                                      | 0     | 0     | 0     | 0     | 0     |
| Percent of employees under collective bargaining agreements at year end  | 0     | 0     | 0     | 0     | 0     |
| Number of permanent employees at year end                                | 6,686 | 5,670 | 5,460 | 5,337 | 4,793 |
| Percent men  | 76    | 78    | 79    | 79    | 80    |
| Percent women  | 24    | 22    | 21    | 21    | 20    |
| Percent ethnically diverse   | 16    | 16    | 16    | 15    | 15    |
| Percent of management roles held by a diverse population                 | 24    | 24    | 23    | 27    | 26    |
| Percent women  | N/A   | N/A   | 15    | 16    | 16    |
| Percent men  | N/A   | N/A   | 85    | 84    | 84    |
| Number of permanent employees by region <sup>27</sup>                    |       |       |       |       |       |
| Atlantic-Gulf  | N/A   | N/A   | 1,375 | 1,325 | 1,229 |
| Northeast  | N/A   | N/A   | 1,387 | 1,548 | 1,374 |
| West   | N/A   | N/A   | 1,530 | 1,295 | 1,127 |
| Tulsa Headquarters   | N/A   | N/A   | 1,168 | 1,169 | 1,063 |
| Number of full-time employees by gender <sup>27</sup>                    |       |       |       |       |       |
| Women  | N/A   | N/A   | 1,099 | 1,107 | 979   |
| Men  | N/A   | N/A   | 4,143 | 4,176 | 3,813 |
| Number of part-time employees by gender <sup>27</sup>                    |       |       |       |       |       |
| Women  | N/A   | N/A   | 35    | 30    | 26    |
| Men  | N/A   | N/A   | 6     | 3     | 3     |
| Percent of employees under 30 years old                                  | N/A   | N/A   | 11    | 11    | 11    |
| Percent of employees between 30–50 years old                             | N/A   | N/A   | 51    | 53    | 57    |
| Percent of employees over 50 years old                                   | N/A   | N/A   | 38    | 36    | 32    |
| Corporate and technical training hours completed by employees, thousands | 111   | 114   | 182   | 172   | 175   |
| Corporate and technical training hours completed per employee            | 17    | 20    | 33    | 32    | 37    |
| Corporate and technical training expenditures, millions of dollars       | 6.57  | 2.92  | 3.71  | 3.54  | 3.77  |
| Percent of employees who received a performance review <sup>28</sup>     | 100   | 100   | 100   | 100   | 100   |

<sup>27</sup>Data compiled using HRIS system of record. No variations in employees by type and contract. Our workforce trends with the state of the business/market, not with seasons. Region data presented is based on primary work location. Due to the change in our human capital system of record, data prior to 2017 is not available. Williams does not employ temporary workers.

<sup>28</sup>100% of eligible employees received a year-end performance rating. Ineligible employees include interns, employees on long-term disability leave, and external new hires joining the organization on or after August 1 and thus deemed too new to assess.

| Metric  | 2015  | 2016   | 2017   | 2018  | 2019      |
|---|-------|--------|--------|-------|-----------|
| <b>Governance</b>   |       |        |        |       |           |
| Spending on taxes, millions of dollars <sup>29</sup>  | 195.0 | 216.9  | 260.9  | 261.2 | 263.8     |
| Percent votes for the company's executive compensation program <sup>30</sup>  | 97.78 | 88.87  | 96.85  | 97.29 | 96.87     |
| Percent of employees that completed compliance and ethics training  | 100   | 100    | 100    | 100   | 100       |
| Number of inquiries received through ethics reporting channels  | 265   | 212    | 215    | 203   | 210       |
| Number of inquiries received through ethics reporting channels by Code of Business Conduct category                                 |       |        |        |       |           |
| Work environment  | 186   | 161    | 149    | 134   | 134       |
| Health, safety and the environment  | 11    | 10     | 30     | 31    | 45        |
| Conflicts of interest   | 22    | 20     | 18     | 19    | 10        |
| Protecting company assets   | 46    | 21     | 18     | 19    | 21        |
| Number of inquiries received through ethics reporting channels by reporting channel <sup>31</sup>                                   |       |        |        |       |           |
| Human resources   | 62    | 58     | 71     | 74    | 58        |
| Action line   | 100   | 72     | 55     | 51    | 32        |
| Management  | 76    | 37     | 56     | 40    | 70        |
| Business ethics resources center  | 17    | 18     | 13     | 5     | 6         |
| Other reporting channels  | 10    | 27     | 20     | 33    | 44        |
| Percent of board members between 30–50 years old <sup>32</sup>  | 17    | 0      | 0      | 8     | 8         |
| Percent of board members over 50 years old <sup>32</sup>  | 83    | 100    | 100    | 92    | 92        |
| Female board members, percent <sup>32</sup>   | 31    | 17     | 18     | 25    | 25        |
| Ethnically diverse board members, percent <sup>32</sup>   | 8     | 0      | 0      | 8     | 8         |
| Percent of employees that completed cybersecurity training  | N/A   | N/A    | N/A    | 99.0  | 99.4      |
| Monetary losses as a result of legal proceedings associated with federal pipeline and storage regulations, dollars <sup>33</sup>    | 0     | 39,700 | 53,500 | 0     | 1,944,700 |
| Legal and regulatory fines and settlements associated with violations of bribery, corruption or anti-competitive standards, dollars | 0     | 0      | 0      | 0     | 0         |

<sup>29</sup>Includes Social Security, Medicare, state franchise, property, federal, state, foreign, federal and state transaction taxes paid. ACMP property taxes only included in 2017–2019 (once property tax work was prepared in-house). Excludes property tax amounts for assets sold by Williams. The Federal portion is primarily Federal Excise Tax and Federal PERC Fees. The State portion is primarily Sales/Use, OH CAT Tax, TX Utility Tax, NM Gas Processors Tax and WV Motor Fuel Tax. In 2019, Williams restated 2015–2018 data because FICA was double counted.

<sup>30</sup>Percentage is calculated based on votes reported in the applicable Form 8-K. Percentage is calculated as votes “for” divided by the sum of votes “for” plus votes “against” plus “abstain” votes.

<sup>31</sup>Other reporting channels include the Williams call center, social media and enterprise security.

<sup>32</sup>The 2015, 2016 and 2017 percentages are based upon the board structure as of that year's proxy statement.

<sup>33</sup>In 2019, the Company incurred monetary losses as a result of legal proceedings associated with federal pipeline and storage regulations. Legal proceedings include: (1) A PHMSA Notice of Probable Violation associated with the March 2014 incident at Northwest Pipeline's Plymouth LNG facility. The matter is fully resolved. (2) A PHMSA Notice of Probable Violation to Transco for its Princeton and Charlottesville divisions associated with the timing of inspections, compliance with certain procedures, and the maintenance of certain records. The matter is resolved. (3) A PHMSA Notice of Probable Violation following the October 2015 incident at Transco's Compressor Station 62 in Louisiana, which related to maintenance work performed by third-party contractors on the slug catcher. The matter is resolved.



# Content Index

GRI 102-55

## SASB Oil & Gas: Midstream Sustainability Accounting Standard

| Material Topic                  | SASB Disclosure  | Report Section or Direct Response                      | Page   | Omissions   |
|---------------------------------|--|--|--------|---|
| <b>Greenhouse Gas Emissions</b> |  |  |        |   |
| <b>Accounting Metric</b>        |  |  |        |   |
| Climate Change                  | EM-MD-110a.1: Gross global Scope 1 emissions, percentage methane, percentage covered under emissions-limiting regulations  | <a href="#">Climate Change, Performance Data Table</a> | 20, 66 | Elements of this metric were omitted based on lack of availability. Williams does not report gross global Scope 1 greenhouse gas emissions for hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, and nitrogen trifluoride. |
|                                 | EM-MD-110a.2: Discussion of long-term and short-term strategy or plan to manage Scope 1 emissions, emissions reduction targets, and an analysis of performance against those targets   | <a href="#">Climate Change, Performance Data Table</a> | 20, 66 |   |
| <b>Air Quality</b>              |  |  |        |   |
| <b>Accounting Metric</b>        |  |  |        |   |
| Air Emissions                   | EM-MD-120a.1: Air emissions of the following pollutants:<br>(1) NO <sub>x</sub> (excluding N <sub>2</sub> O),<br>(2) SO <sub>x</sub> ,<br>(3) volatile organic compounds (VOCs), and<br>(4) particulate matter (PM <sub>10</sub> ) | <a href="#">Air Emissions, Performance Data Table</a>  | 26, 66 |   |

| Material Topic            | SASB Disclosure   | Report Section or Direct Response                                 | Page   | Omissions  |
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| <b>Ecological Impacts</b> |   |   |        |  |
| <b>Accounting Metric</b>  |   |   |        |  |
| Biodiversity and Land Use | EM-MD-160a.1: Description of environmental management policies and practices for active operations  | <a href="#">Biodiversity and Land Use</a>                         | 27     | Elements of this metric were omitted based on lack of applicability. Williams does not disclose the degree to which our policies and practices are aligned with the International Finance Corporation's Performance Standards on Environmental and Social Sustainability.  |
|                           | EM-MD-160a.2: Percentage of land owned, leased, and/or operated within areas of protected conservation status or endangered species habitat         | <a href="#">Biodiversity and Land Use, Performance Data Table</a> | 27, 66 |  |
|                           | EM-MD-160a.3: Terrestrial acreage disturbed, percentage of impacted area restored   | <a href="#">Performance Data Table</a>                            | 27, 66 | Elements of this metric were omitted based on lack of applicability. The majority of our operations are underground, and aboveground rights of way are restored vegetation. Instead, Williams reports the number of active remediation sites within the performance data table, which provides the most accuracy and comparability for stakeholders.   |
|                           | EM-MD-160a.4: Number and aggregate volume of hydrocarbon spills, volume in Arctic, volume in Unusually Sensitive Areas (USAs), and volume recovered | <a href="#">Spill Performance, Performance Data Table</a>         | 23, 66 | Elements of this metric were omitted based on the lack of availability. Williams is working to improve the accuracy of its data related to the volume of hydrocarbon spills recovered and the volume of hydrocarbon spills in unusually sensitive areas as defined by PHMSA. We are in the process of implementing new data collection processes, and anticipate reporting this information in our 2020 Sustainability Report. |

| Material Topic              | SASB Disclosure | Report Section or Direct Response | Page | Omissions |
|-----------------------------|-----------------|-----------------------------------|------|-----------|
| <b>Competitive Behavior</b> |                 |                                   |      |           |

#### Accounting Metric

|                      |   |  |    |  |
|----------------------|---|--|----|--|
| Ethics and Integrity | EM-MD-520a.1: Total amount of monetary losses as a result of legal proceedings associated with federal pipeline and storage regulations | <a href="#">Performance Data Table</a> | 66 |  |
|                      |   |  |    |  |

#### Operational Safety, Emergency Preparedness and Response

#### Accounting Metric

|        |   |  |        |  |
|--------|---|--|--------|--|
| Safety | EM-MD-540a.1: Number of reportable pipeline incidents, percentage significant   | <a href="#">Asset &amp; Mechanical Integrity, Performance Data Table</a>   | 36, 66 |  |
|        | EM-MD-540a.2: Percentage of (1) natural gas and (2) hazardous liquid pipelines inspected  | <a href="#">Asset &amp; Mechanical Integrity, Performance Data Table</a>   | 36, 66 |  |
|        | EM-MD-540a.3: Number of (1) accident releases and (2) nonaccident releases (NARs) from rail transportation  | N/A  | N/A    | This metric was omitted based on the lack of applicability. Williams is not responsible for rail transportation. |
|        | EM-MD-540a.4e: Discussion of management systems used to integrate a culture of safety and emergency preparedness throughout the value chain and throughout project lifecycles | <a href="#">Personnel Safety, Emergency Preparedness and Public Safety</a> | 32, 37 |  |

#### Activity Metric

#### Sustainability Disclosure Topics and Accounting Metrics 2018

|  |   |  |    |   |
|--|---|--|----|---|
|  | EM-MD-000.A: Total metric ton-kilometers of: (1) natural gas, (2) crude oil, and (3) refined petroleum products transported, by mode of transport | <a href="#">Performance Data Table</a> | 66 | This metric was omitted based on the lack of applicability. Instead, Williams reports our ONE Future methane intensity metric within the performance data table, which provides the most accuracy and comparability for stakeholders. |
|--|---|--|----|---|



## GRI Content Index: General Disclosures

| GRI Disclosure   | Report Section or Direct Response  | Page  |
|--|--|-------|
| <b>Organizational Profile</b>  |  |       |
| <b>GRI 102: General Disclosures 2016</b>                             |  |       |
| 102-1: Name of the organization                                      | The Williams Companies, Inc.   | N/A   |
| 102-2: Activities, brands, products, and services                    | <a href="#">About Williams</a>   | 7     |
| 102-3: Location of headquarters                                      | Tulsa, Oklahoma  | N/A   |
| 102-4: Location of operations  | <a href="#">About Williams</a>   | 7     |
| 102-5: Ownership and legal form                                      | Fortune 500 company with common stock (NYSE: WMB) as a component of the S&P 500.   | N/A   |
| 102-6: Markets served  | <a href="#">About Williams</a>   | 7     |
| 102-7: Scale of the organization                                     | <a href="#">About Williams</a><br><br>See our <a href="#">2019 Filing 10-K Annual Report PDF page 76</a> for information on net revenues and quantity of products provided in 2019.  | 7     |
| 102-8: Information on employees and other workers                    | <a href="#">About Williams, Diversity &amp; Inclusion</a>  | 7, 44 |
| 102-9: Supply chain  | <a href="#">Supply Chain Management</a>  | 53    |
| 102-10: Significant changes to the organization and its supply chain | There were no significant changes to Williams' operations or our supply chain in 2019.   | N/A   |
| 102-11: Precautionary principle or approach                          | Williams does not formally follow the precautionary principle. We assess environmental risks across our operations and have a comprehensive risk management plan in place through our Williams Integrated Management System. | N/A   |
| 102-12: External initiatives   | ONE Future Coalition; U.S. Environmental Protection Agency's Natural Gas STAR; American Petroleum Institute Environmental Partnership; and The National Petroleum Council Infrastructure Study.                              | N/A   |
| 102-13: Membership of associations                                   | <a href="#">Trade Associations</a>   | 62    |
| <b>Strategy</b>  |  |       |
| <b>GRI 102: General Disclosures 2016</b>                             |  |       |
| 102-14: Statement from senior decision-maker                         | <a href="#">CEO Letter</a>   | 4     |
| <b>Ethics and Integrity</b>  |  |       |
| <b>GRI 102: General Disclosures 2016</b>                             |  |       |
| 102-16: Values, principles, standards and norms of behavior          | <a href="#">About Williams, Ethics and Integrity</a>   | 7, 56 |
| 102-17: Mechanisms for advice and concerns about ethics              | <a href="#">Ethics and Integrity</a>   | 56    |

| GRI Disclosure  | Report Section or Direct Response   | Page   |
|---|---|--------|
| <b>Governance</b>   |   |        |
| <b>GRI 102: General Disclosures 2016</b>  |   |        |
| 102-18: Governance structure  | <a href="#">Board Structure</a>   | 58     |
| 102-20: Executive-level responsibility for economic, environmental, and social topics | <a href="#">Sustainability Oversight</a>  | 59     |
| 102-23: Chair of the highest governance body  | <a href="#">Board Structure</a>   | 58     |
| 102-24: Nominating and selecting the highest governance body                          | <a href="#">Board Selection Process</a>   | 58     |
| 102-32: Highest governance body's role in sustainability reporting                    | <a href="#">Sustainability Oversight</a>  | 59     |
| <b>Stakeholder Engagement</b>   |   |        |
| <b>GRI 102: General Disclosures 2016</b>  |   |        |
| 102-40: List of stakeholder groups  | <a href="#">Stakeholder Engagement</a>  | 10     |
| 102-41: Collective bargaining agreements  | <a href="#">Employee Attraction and Retention</a>   | 39     |
| 102-42: Identifying stakeholders  | <a href="#">Stakeholder Engagement</a>  | 10     |
| 102-43: Approach to stakeholder engagement  | <a href="#">Stakeholder Engagement</a>  | 10     |
| 102-44: Key topics and concerns raised  | <a href="#">Materiality Assessment</a>  | 12     |
| <b>Reporting Practices</b>  |   |        |
| <b>GRI 102: General Disclosures 2016</b>  |   |        |
| 102-45: Entities included in consolidated financial statements                        | See our <a href="#">2019 Filing 10-K Annual Report PDF page 9</a> for a list of all entities included Williams' consolidated financial statements.  | N/A    |
| 102-46: Defining report content and topic Boundaries                                  | <a href="#">Materiality Assessment, About this Report</a>   | 12, 11 |
| 102-47: List of material topics   | <a href="#">Materiality Assessment</a>  | 12     |
| 102-48: Restatements of information   | 2018 community investment data restated to include Atlantic Sunrise environmental stewardship grant payments, resulting in an increase in performance. 2015–2018 tax spending data restated because FICA was double counted, resulting in a decrease in reported spending. 2016–2018 greenhouse gas emissions data restated if corrections or methodology changes resulted in a change greater than 10,000 metric tons. | N/A    |
| 102-49: Changes in reporting  | No changes in reporting in 2019.  | N/A    |
| 102-50: Reporting period  | This 2019 Sustainability Report covers Williams' operations from January 1, 2019, through December 31, 2019, unless otherwise indicated.  | N/A    |
| 102-51: Date of most recent report  | Williams' 2018 Sustainability Report published on June 26, 2019.  | N/A    |
| 102-52: Reporting cycle   | Williams reports on an annual cycle.  | N/A    |

| GRI Disclosure   | Report Section or Direct Response   | Page |
|--|---|------|
| 102-53: Contact point for questions regarding the report         | For more information or to offer comments and suggestions about this report, contact <a href="mailto:WilliamsContact@williams.com">WilliamsContact@williams.com</a> . | N/A  |
| 102-54: Claims of reporting in accordance with the GRI Standards | This report has been prepared in accordance with the GRI Standards: Core option.  | N/A  |
| 102-55: GRI Content Index  | <a href="#">Content Index</a>   | 72   |
| 102-56: External assurance                                       | <a href="#">Assurance Statement</a>   | 82   |

## GRI Content Index: Topic-Specific Disclosures

| Material Topic                                 | GRI Disclosure  | Report Section or Direct Response   | Page   | Omissions |
|--|---|---|--------|-----------|
| <b>Anti-Competitive Behavior</b>               |   |   |        |           |
| <b>GRI 103: Management Approach 2016</b>       |   |   |        |           |
| Ethics and Integrity                           | 103-1: Explanation of the material topic and its Boundary   | <a href="#">Ethics and Integrity</a>  | 56     |           |
|  | 103-2: The management approach and its components   | <a href="#">Ethics and Integrity</a>  | 56     |           |
|  | 103-3: Evaluation of the management approach  | <a href="#">Ethics and Integrity</a>  | 56     |           |
| <b>GRI 206: Anti-Competitive Behavior 2016</b> |   |   |        |           |
| Ethics and Integrity                           | 206-1: Legal actions for anti-competitive behavior, anti-trust, and monopoly practices                            | <a href="#">Ethics and Integrity</a> ,<br><a href="#">Performance Data Table</a>      | 56, 64 |           |
| <b>Biodiversity</b>                            |   |   |        |           |
| <b>GRI 103: Management Approach 2016</b>       |   |   |        |           |
| Biodiversity and Land Use                      | 103-1: Explanation of the material topic and its Boundary   | <a href="#">Biodiversity and Land Use</a>   | 27     |           |
|  | 103-2: The management approach and its components   | <a href="#">Biodiversity and Land Use</a>   | 27     |           |
|  | 103-3: Evaluation of the management approach  | <a href="#">Biodiversity and Land Use</a>   | 27     |           |
| <b>GRI 304: Biodiversity 2016</b>              |   |   |        |           |
| Biodiversity and Land Use                      | 304-4: IUCN Red List species and national conservation list species with habitats in areas affected by operations | <a href="#">Biodiversity and Land Use</a> ,<br><a href="#">Performance Data Table</a> | 27, 64 |           |



| Material Topic | GRI Disclosure | Report Section or Direct Response | Page | Omissions |
|----------------|----------------|-----------------------------------|------|-----------|
|----------------|----------------|-----------------------------------|------|-----------|

## Emissions

### GRI 103: Management Approach 2016

|                                  |   |                               |        |  |
|----------------------------------|---|-------------------------------|--------|--|
| Climate Change,<br>Air Emissions | 103-1: Explanation of the material topic and its Boundary | Climate Change, Air Emissions | 16, 26 |  |
|                                  | 103-2: The management approach and its components         | Climate Change, Air Emissions | 16, 26 |  |
|                                  | 103-3: Evaluation of the management approach              | Climate Change, Air Emissions | 16, 26 |  |

### GRI 305: Emissions 2016

|                |  |  |        |  |
|----------------|--|--|--------|--|
| Climate Change | 305-1: Direct (Scope 1) GHG emissions  | Climate Change, Performance Data Table | 16, 66 |  |
|                | 305-2: Energy indirect (Scope 2) GHG emissions   | Climate Change, Performance Data Table | 16, 66 |  |
| Air Emissions  | 305-7: Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions | Air Emissions, Performance Data Table  | 26, 66 |  |

## Environmental Compliance

### GRI 103: Management Approach 2016

|                           |   |                           |    |  |
|---------------------------|---|---------------------------|----|--|
| Environmental Stewardship | 103-1: Explanation of the material topic and its Boundary | Environmental Stewardship | 21 |  |
|                           | 103-2: The management approach and its components         | Environmental Stewardship | 21 |  |
|                           | 103-3: Evaluation of the management approach              | Environmental Stewardship | 21 |  |

### GRI 307: Environmental Compliance 2016

|                           |  |  |        |  |
|---------------------------|--|--|--------|--|
| Environmental Stewardship | 307-1: Noncompliance with environmental laws and regulations | Environmental Compliance, Performance Data Table | 22, 66 |  |
|---------------------------|--|--|--------|--|

## Supplier Environmental Assessment

### GRI 103: Management Approach 2016

|                         |   |                         |    |  |
|-------------------------|---|-------------------------|----|--|
| Supply Chain Management | 103-1: Explanation of the material topic and its Boundary | Supply Chain Management | 53 |  |
|                         | 103-2: The management approach and its components         | Supply Chain Management | 53 |  |
|                         | 103-3: Evaluation of the management approach              | Supply Chain Management | 53 |  |

| Material Topic   | GRI Disclosure   | Report Section or Direct Response        | Page   | Omissions  |
|--|--|--|--------|--|
| <b>GRI 308: Supplier Environmental Assessment 2016</b> |  |  |        |  |
| Supply Chain Management                                | 308-1: New suppliers that were screened using environmental criteria   | Data not available for 2019.             | N/A    | Information unavailable for 308-1: Data will be available in 2020 as part of Williams' new supplier qualification process. |
| <b>Occupational Health and Safety</b>                  |  |  |        |  |
| <b>GRI 103: Management Approach 2016</b>               |  |  |        |  |
| Safety   | 103-1: Explanation of the material topic and its Boundary  | Safety                                   | 32     |  |
|  | 103-2: The management approach and its components  | Safety                                   | 32     |  |
|  | 103-3: Evaluation of the management approach   | Safety                                   | 32     |  |
| <b>GRI 403: Occupational Health and Safety 2018</b>    |  |  |        |  |
| Safety   | 403-1: Occupational health and safety management system  | Personnel Safety                         | 32     |  |
|  | 403-2: Hazard identification, risk assessment, and incident investigation  | Personnel Safety                         | 32     |  |
| Workforce Health and Development                       | 403-3: Occupational health services  | N/A                                      | N/A    | Information unavailable for 403-3: Williams is working to disclose this information in our 2020 Sustainability Report.     |
| Safety   | 403-4: Worker participation, consultation, and communication on occupational health and safety                       | N/A                                      | N/A    | Information unavailable for 403-4: Williams is working to disclose this information in our 2020 Sustainability Report.     |
|  | 403-5: Worker training on occupational health and safety   | Personnel Safety                         | 32     |  |
| Workforce Health and Development                       | 403-6: Promotion of worker health  | Workforce Health and Development         | 39     |  |
| Safety   | 403-7: Prevention and mitigation of occupational health and safety impacts directly linked by business relationships | Personnel Safety                         | 32     |  |
|  | 403-8: Workers covered by an occupational health and safety management system  | Personnel Safety                         | 32     |  |
|  | 403-9: Work-related injuries   | Personnel Safety, Performance Data Table | 32, 66 |  |

| Material Topic                                       | GRI Disclosure  | Report Section or Direct Response                                | Page       | Omissions |
|--|---|--|------------|-----------|
| <b>Training and Education</b>                        |   |  |            |           |
| <b>GRI 103: Management Approach 2016</b>             |   |  |            |           |
| Workforce Health and Development                     | 103-1: Explanation of the material topic and its Boundary                                   | Workforce Health and Development                                 | 39         |           |
|  | 103-2: The management approach and its components   | Workforce Health and Development                                 | 39         |           |
|  | 103-3: Evaluation of the management approach  | Workforce Health and Development                                 | 39         |           |
| <b>GRI 404: Training and Education 2016</b>          |   |  |            |           |
| Workforce Health and Development                     | 404-1: Average hours of training per year per employee                                      | Employee Development, Performance Data Table                     | 42, 66     |           |
|  | 404-3: Percentage of employees receiving regular performance and career development reviews | Employee Development, Performance Data Table                     | 42, 66     |           |
| <b>Diversity and Equal Opportunity</b>               |   |  |            |           |
| <b>GRI 103: Management Approach 2016</b>             |   |  |            |           |
| Workforce Health and Development                     | 103-1: Explanation of the material topic and its Boundary                                   | Diversity and Inclusion, Board Leadership                        | 44, 58     |           |
|  | 103-2: The management approach and its components   | Diversity and Inclusion, Board Leadership                        | 44, 58     |           |
|  | 103-3: Evaluation of the management approach  | Diversity and Inclusion, Board Leadership                        | 44, 58     |           |
| <b>GRI 405: Diversity and Equal Opportunity 2016</b> |   |  |            |           |
| Workforce Health and Development                     | 405-1: Diversity of governance bodies and employees   | Board Structure, Diversity and Inclusion, Performance Data Table | 58, 44, 66 |           |
| <b>Rights of Indigenous Peoples</b>                  |   |  |            |           |
| <b>GRI 103: Management Approach 2016</b>             |   |  |            |           |
| Community Engagement                                 | 103-1: Explanation of the material topic and its Boundary                                   | Indigenous Peoples   | 48         |           |
|  | 103-2: The management approach and its components   | Indigenous Peoples   | 48         |           |
|  | 103-3: Evaluation of the management approach  | Indigenous Peoples   | 48         |           |
| <b>GRI 411: Rights of Indigenous Peoples 2016</b>    |   |  |            |           |
| Community Engagement                                 | 411-1: Incidents of violations involving rights of indigenous peoples                       | Indigenous Peoples, Performance Data Table                       | 48, 66     |           |



| Material Topic                               | GRI Disclosure   | Report Section or Direct Response               | Page   | Omissions |
|--|--|---|--------|-----------|
| <b>Public Policy</b>                         |  |   |        |           |
| <b>GRI 103: Management Approach 2016</b>     |  |   |        |           |
| Government Relations                         | 103-1: Explanation of the material topic and its Boundary  | Government Relations                            | 61     |           |
|  | 103-2: The management approach and its components          | Government Relations                            | 61     |           |
|  | 103-3: Evaluation of the management approach               | Government Relations                            | 61     |           |
| <b>GRI 415: Public Policy 2016</b>           |  |   |        |           |
| Government Relations                         | 415-1: Political contributions                             | Political Contributions, Performance Data Table | 62, 66 |           |
| <b>Shareholder Relations (Non-GRI Topic)</b> |  |   |        |           |
| <b>GRI 103: Management Approach 2016</b>     |  |   |        |           |
| Shareholder Relations                        | 103-1: Explanation of the material topic and its Boundary  | Shareholder Relations                           | 60     |           |
|  | 103-2: The management approach and its components          | Shareholder Relations                           | 60     |           |
|  | 103-3: Evaluation of the management approach               | Shareholder Relations                           | 60     |           |
| <b>Self-Selected Metric</b>                  |  |   |        |           |
| Shareholder Relations                        | Number of shareholder engagements                          | Shareholder Relations                           | 60     |           |
| <b>Cybersecurity (Non-GRI Topic)</b>         |  |   |        |           |
| <b>GRI 103: Management Approach 2016</b>     |  |   |        |           |
| Cybersecurity                                | 103-1: Explanation of the material topic and its Boundary  | Cybersecurity                                   | 63     |           |
|  | 103-2: The management approach and its components          | Cybersecurity                                   | 63     |           |
|  | 103-3: Evaluation of the management approach               | Cybersecurity                                   | 63     |           |
| <b>Self-Selected Metric</b>                  |  |   |        |           |
| Cybersecurity                                | Percent of employees that completed cybersecurity training | Cybersecurity, Performance Data Table           | 63, 66 |           |

# Independent Assurance Statement to Williams Companies Inc.

GRI 102-56

ERM Certification and Verification Services (ERM CVS) was engaged by Williams Companies Inc. ('Williams') to provide assurance in relation to the information set out below and presented in the 2019 Sustainability Report ('the Report').

## Engagement Summary

### Scope of Our Assurance Engagement

Whether the 2019 selected GHG and safety data are fairly presented, in all material respects, with the reporting criteria.

#### GHG Emissions

- Total 2019 Scope 1 GHG Emissions (absolute) 'facility-direct emissions' (million metric tons CO<sub>2</sub>e) using an operational control boundary' (million metric tons CO<sub>2</sub>e)
- Total 2019 Scope 2 GHG emissions (location based) (million metric tons CO<sub>2</sub>e)
- Total 2019 GHG emissions (Scope 1 & 2) (million metric tons CO<sub>2</sub>e)

#### Safety

- Lost-time incident rate per 200,000 work hours — employees
- Total recordable incident rate per 200,000 work hours — employees
- Employee fatality rate per 200,000 work hours
- Employee fatality rate per 1,000 employees
- Number of hours worked — employees
- Fatalities — employees
- Fatalities — non-employee workers

### Reporting Criteria

WBCSD/WRI Protocol for GHG emissions, EPA GHG Reporting Requirements, OSHA definitions for safety indicators (as appropriate based on selected scope), and Williams' internal reporting criteria and definitions (where relevant).

### Assurance Standard

ERM CVS' assurance methodology, based on the International Standard on Assurance Engagements ISAE 3000 (Revised).

### Assurance Level

Limited assurance.

### Respective Responsibilities

Williams is responsible for preparing the Report and for the collection and presentation of the information within it. ERM CVS's responsibility is to provide conclusions on the agreed scope based on the assurance activities performed and exercising our professional judgement.

## Our Conclusions

Based on our activities, as described below, nothing has come to our attention to indicate that the 2019 selected GHG and safety data listed under 'Scope' above are not fairly presented, in all material respects, with the reporting criteria.

## Our Assurance Activities

A multi-disciplinary team of sustainability and assurance specialists performed a range of assurance procedures which varied across the disclosures covered by our assurance engagement, as follows:

- 'Virtual' interviews with management representatives responsible for the selected metrics.
- 'Virtual' interviews with relevant EHS staff, including EHS regional managers and emission source Specialists for Midstream and Transmission & Storage for greenhouse gas data, to understand and evaluate the relevant data collection and reporting processes, as well as internal review procedures used for the selected disclosures.

<sup>1</sup>Excludes office buildings and company vehicles.

- Walkthrough of both the safety and emissions data management systems with the systems administrators.
- A review at corporate level of a sample of greenhouse gas calculation workbooks.
- Examination of safety data readouts, Human Resources hours worked references and Williams' safety reports.
- An analytical review of the data and a check on the completeness and accuracy of the corporate data consolidation, including conversion factors and emission factors used.
- Evaluation of the consistency of reported annual data with selected underlying source data for each indicator in scope, including a more detailed review of specific data from a sample of locations.
- Reviewing the presentation of information relevant to the scope of our work in the Report to ensure consistency with our findings.

## The Limitations of Our Engagement

The reliability of the assured information is subject to inherent uncertainties, given the available methods for determining, calculating or estimating the underlying information. It is important to understand our assurance conclusions in this context. During our assurance engagement, travel restrictions were imposed following the outbreak of COVID-19. As a result of these we were unable to carry out our assurance activities as originally planned and agreed with Williams. We agreed to replace in person head office visit with 'virtual' visits via conference and video calls for this year's assurance engagement.



Jennifer Iansen-Rogers, Head of Corporate Assurance  
14 July 2020  
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ERM CVS is a member of the ERM Group. The work that ERM CVS conducts for clients is solely related to independent assurance activities and auditor training. Our processes are designed and implemented to ensure that the work we undertake with clients is free from bias and conflict of interest. ERM CVS and the staff that have undertaken work on this assurance exercise provide no consultancy related services to Williams in any respect.

# Forward-Looking Statements

This report of The Williams Companies, Inc. (Williams) may contain or incorporate reference statements that do not directly or exclusively relate to historical facts. Such statements are "forward-looking statements" within the meaning of Section 27A of the Securities Act of 1933, as amended, and Section 21E of the Securities Exchange Act of 1934, as amended. These forward-looking statements relate to anticipated financial performance, management's plans and objectives for future operations, business prospects, outcome of regulatory proceedings, market conditions and other matters. We make these forward-looking statements in reliance on the safe harbor protections provided under the Private Securities Litigation Reform Act of 1995. All statements, other than statements of historical facts, included herein that address activities, events or developments that we expect, believe or anticipate will exist or may occur in the future, are forward-looking statements.

Forward-looking statements can be identified by various forms of words such as "anticipates," "believes," "seeks," "could," "may," "should," "continues," "estimates," "expects," "forecasts," "intends," "might," "goals," "objectives," "targets," "planned," "potential," "projects," "scheduled," "will," "assumes," "guidance," "outlook," "in-service date" or other similar expressions. These forward-looking statements are based on management's beliefs and assumptions and on information currently available to management. Certain important factors that could cause actual results to differ, possibly materially, from expectations or estimates reflected in such forward-looking statements can be found in the "Risk Factors" and "Forward-Looking Statements" sections included in Williams's Annual Report on Form 10-K filed with the SEC on February 24, 2020, and in Part II, Item 1A Risk Factors in our Quarterly Reports on Form 10-Q. Given the uncertainties and risk factors that could cause our actual results to differ materially from those contained in any forward-looking statement, we caution investors not to unduly rely on our forward-looking statements. We disclaim any obligations to, and do not intend to, update any particular forward-looking statement included in this report or announce publicly the result of any revisions to any of the forward-looking statements to reflect future events or developments.



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