



Gift Policy Pertaining to U.S. Government and Regulatory Employees

Policy Statement Williams is committed to compliance with all applicable laws, regulatory requirements and internal policies and procedures related to gifts to U.S. government and regulatory employees.

There are very strict rules pertaining to gifts to U.S. federal government employees and to employees of state, county, local and other governmental agencies. Some states and other governmental agencies completely ban gifts to their employees of any amount or nature. It is the responsibility of all Williams employees to know that rules regulate this conduct, that there are penalties for non-compliance and that full compliance is expected. Williams employees shall not give any gift to a government employee that would cause that employee to violate any applicable rule pertaining to gifts.

Williams employees are prohibited from giving gifts to government and regulatory employees due to the potential appearance of impropriety and the potential for mistakes due to the complexity of the rules, which vary by state and agency. This policy applies even in the case where the legislator or government employee agrees to reimburse Williams or the Williams employee for the gift.

Many government agencies do not consider minor food items to be gifts. These items include snacks, which are nominal food items (e.g., coffee, soft drinks, water, cookies, or similar modest food items). There may be times when meetings, inspections, public outreach, site visits or similar events with government employees take place during a normal lunch period. During these meetings, a modest lunch may be offered if the cost is less than \$20 and the agency has confirmed they may accept the lunch. Meals exceeding \$20 require prior written approval from the General Counsel.

Applicability Williams Enterprise

Related Standards [Code of Business Conduct](#)
[Government Affairs Site](#)

Related Procedures [Approval Form](#)

Consequences / Penalty for Non-Compliance Adherence to policies is mandatory. Non-compliance with this policy may subject the company to fines and various penalties from government agencies. A non-complying employee may face disciplinary action up to and including termination.



Reservation of Rights This policy is subject to change or modification at the sole discretion of the Company. From time-to-time, employees may receive updated information concerning changes to this policy and any related standards. Any such revisions will be effective on the date established by the Company.

Terms and Definitions

Employee For purposes of this policy, all full-time, part-time, temporary Williams' employees and contractors.

Gifts Business gifts, broadly defined, include company logo'd items, travel, entertainment, access to high-profile events, and items of nominal cost.

Approval Request An authorization form must be completed by the employee, approved by their supervisor and submitted to the General Counsel for approval prior to giving a meal exceeding \$20 to any government employee.

Roles and Responsibilities

Government Affairs Department Is responsible for verifying that all gift requests are compliant with all regulations and applicable laws.

VP of Government Affairs Is responsible for reviewing all due diligence and approving or rejecting all requests to give a gift to a government employee.

Employees Are responsible for knowing company policy and requesting prior approval to give a meal exceeding \$20.

Administrative Information

Policy Owner / Approver Senior Vice President and General Counsel

Signature

Approval Date April 14, 2015

Effective Date April 14, 2015

Expiration Date

Policy Custodian June M. Pennell
PAC Manager



Change Log:

Date	Reason for Change	Change Made By

Key Words:
