

CONTRACTOR ENVIRONMENTAL, HEALTH AND SAFETY EXPECTATIONS

1. INTRODUCTION AND Purpose

Williams employs a diverse group of contractors who provide specific labor or service functions necessary to its operations. While diverse in nature, all contractors have a common need for effective EH&S programs to protect Williams' employees, contractors, and the community from injury, illness and losses associated with incidents arising from contractors' work.

The purpose of Williams' Contractor EH&S Program is to ensure that contractors and their subcontractor(s) understand the environmental, health and safety requirements as they apply to the general scope of the contractor's work. Williams expects contractors to comply with the Williams' Contractor EH&S Program. All references to "contractor" below will also apply to sub-contractors hired by the contractor. The contractor is responsible for all subcontractors on a Williams' site at the contractor's request.

The Contractor EH&S Program provides Williams with methods to monitor and improve contractor EH&S performance and regulatory compliance, while maintaining the independent contractor relationship.

Benefits that result from improved EH&S practices include:

- Safety and well being of employees are increased.
- Exposure to litigation and regulatory action is decreased.
- Adequately trained personnel result in improved productivity and quality.
- The potential for damage to facilities and equipment is minimized.

The requirements of Williams' Contractor EH&S Program apply to service contractors including, but not limited to, those who perform on-site services related to the construction, maintenance, repair, operation, specialty work or renovation/modification on or to company building structures or related facilities/systems. These Program requirements do not apply to incidental services such as janitorial, laundry, supply, delivery, office services, offsite repair and professional services (accounting, engineering, etc).

Since the functions performed by contractors are diverse, Program requirements may vary from one contractor to another, depending on the scope of their work. Therefore, it is the contractor's responsibility to evaluate their specific job hazards and comply with the EH&S requirements associated with these activities.

2. CONTRACTOR RESPONSIBILITIES

As a condition of doing business with Williams, contractors are expected to develop and maintain EH&S programs that address the scope of the contractor's work, and comply with applicable local, state and federal regulatory requirements, as well as Williams' EH&S policies and programs. Ensuring that their employees and subcontractors comply with all requirements of the contractor's and Williams' EH&S programs, shall be the sole responsibility of the contractor.

2.1. Key Contractor Responsibilities include:

- Comply with federal, state, and local EH&S regulations, as well as the conditions and requirements of this EH&S Program.
- Promptly notify Williams of any observed site hazards or adverse EH&S condition.
- Cooperate with Williams to resolve issues that may arise.
- Establish, publish, and distribute EH&S policies and procedures to employees.

- Designate and name personnel to monitor and carry out EH&S program requirements.
- Establish and maintain employee EH&S training programs.
- Conduct and document regularly scheduled “general” EH&S and job-site/job specific “Tail Gate” meetings.
- Immediately report injury or adverse EH&S incident to Williams and appropriate regulatory agencies as required.
- Maintain complete and accurate records of all injuries/incidents as required by law and provide records to Williams upon request.
- Investigate serious incidents and near misses according to internal policy or upon Williams’ request. Provide Williams with written reports based upon the results of the investigation.
- Immediately notify Williams of any regulatory agency review or notice of non-compliance.
- Promptly correct any non-compliance issue when notified by an agency or Williams.
- Ensure that personnel and visitors have and use the proper personal protective equipment while on the job. Williams is not responsible for supplying personal protective equipment to contractor personnel.

3. ProceDUre

3.1. Contractor EH&S Program:

This Contractor EH&S Program explains Williams’ contractor EH&S program requirements and outlines contractor and Company responsibilities. The Contractor EH&S Program will be distributed to all contractors.

3.2. Contractor REVIEWS:

Because tasks performed by Williams’ contractors vary and many require skills and expertise that are not typically found within Williams’ workforce, Williams must rely on the expertise of its contractors to perform in a manner that is protective of the environment and health and safety of their employees, subcontractors, and the community. In order to ensure that Williams’ resources and assets are adequately protected from the actions of contractors, they may be reviewed by Williams on their performance and work practices relating to environmental, health and safety (EH&S) risks. To verify compliance, contractors may be subject to a detailed EH&S review at any time during the term of the working relationship with Williams.

3.2.1. Pre-Approval Reviews

Pre-approval reviews will be conducted using the Contractor EH&S Performance Questionnaire form found in the Contractor Pre-Approval Packet. The Williams’ project manager or supervisor responsible for hiring the contractor will be responsible for ensuring the Pre-Approval Packet is completed and returned to the EH&S Department prior to the contractor beginning work for Williams. Failure to complete the Contractor Pre- Approval Packet will exclude the contractor from Williams’ Approved Contractor List.

3.2.2. Periodic Reviews

Williams may also choose to conduct an on-site EH&S review after approval. Performance Review forms. Reviews may be conducted at the discretion of Williams, and/or specifically as a result of the following incidents:

- Fatality
- Severity and Frequency of Accidents
- Observation of unsafe acts by Williams or other Personnel

3.3. Information and Training:

It is solely the contractor's responsibility to ensure that its employees and sub-contractors are adequately trained.

Project Orientation and EH&S Meetings:

The contractor shall conduct an initial orientation meeting with its employees to ensure that each employee understands the scope of the work, the associated hazards, and the requirements of the Williams' Contractor EH&S Program, as well as any applicable regulations. The orientation shall include a minimum of the elements contained in this Contractor EH&S Program, as well as any additional topics relevant to the scope of work. The content of the orientation shall be documented and each employee must sign the document to indicate that he or she fully understands the topics covered. The completed documentation should be maintained by the contractor and supplied to Williams upon request.

The contractor shall conduct "tailgate" EH&S meetings as appropriate to the job to advise the contractor's employees of changes that could affect the safety of their job or impact the quality of the environment. A copy of the meeting contents and who attended the meeting shall be documented and such documentation provided to Williams upon request.

Depending on the scope of services being provided, contractors may also be required as appropriate to complete a Job Safety Analysis (JSA). Copies of JSA's shall be retained by the contractor on-site and be made available to Williams upon request.

3.4. MASTER SERVICE AGREEMENTS AND CERTIFICATES OF INSURANCE:

Williams requires specific contractors to execute a Master Service Agreement and provide Williams with a current copy of the contractor's Certificates of Insurance, evidencing all the required coverages. The specific insurance coverage requirements are outlined in the Master Service Agreement. If a Master Service Agreement is not executed or current Certificates of Insurance are not kept on file with Williams, this will result in contractor being removed from Williams' Approved Contractor List.

3.5. COMPLIANCE WITH GOVERNMENT REGULATIONS:

Regulatory requirements that apply to contractors may vary by operation and state. Each contractor shall be responsible for determining the applicability of specific regulations to the scope of their work, and for maintaining compliance with applicable EH&S regulations.

Specific regulations that each contractor must comply with as applicable include, but are not limited to:

- Title 29 of the Code of Federal Regulations (CFR), Parts 1910 and 1926 (OSHA)
- Title 49 of the Code of Federal Regulations (CFR), Parts 191, 192, 195 and 199 (DOT)
- Statutes and regulations regarding the environment including, but not limited to, the Federal Clean Air Act, the Federal Water Pollution Control Act, the Resource Conservation and Recovery Act, the Toxic Substance Control Act, and the Safe Drinking Water Act, as well as all associated state delegated or authorized program requirements.

4. GENERAL EH&S POLICIES

The following policies are **minimum EH&S requirements** (in addition to compliance with all Federal, State and Local laws, rules, and regulations) that must be met by contractors and their subcontractors. Contractors are expected to develop and maintain EH&S programs that address the scope of the contractor's work, and comply with (or exceed) applicable local, state, and federal regulatory requirements, as well as Williams' EH&S policies.

Williams requires contractor personnel to be fully trained and knowledgeable of their assigned duties. This includes all applicable requirements for EH&S protection associated with the full scope of the contractor's work.

Safety devices, such as relief valves, shutdowns, alarms, fire suppression systems and vibration devices, etc., shall not be removed, bypassed or disconnected without prior approval from the Williams' project supervisor.

Smoking on Williams' property is prohibited except in designated areas. Contractor employees should consult the Williams' project manager/contact to determine where smoking is allowed.

Intoxicants, narcotics, or illicit drugs shall not be consumed or possessed while using Williams' equipment, working on a Williams' site, or while working on a Williams' project. Any contractor employee under the influence of intoxicants, narcotics, or illicit drugs while at work will be removed from the work location immediately.

Firearms of any kind are prohibited on Williams' property, including the possession of a firearm in a vehicle or other equipment.

It shall be the contractor's responsibility to practice good housekeeping methods to the fullest extent possible. This will include, but not be limited to:

- The proper disposal of trash and waste;
- Keeping materials and supplies orderly, appropriately labeled, and stored safely; and
- Keeping equipment and material from obstructing roads and walkways.

Contractor personnel shall operate vehicles in a responsible and safe manner anytime they are on Williams' property. Contractor personnel shall have a current and valid driver's license and comply with all applicable local and/or State laws governing motor vehicle use.

The contractor shall be responsible for the proper conduct of all contractor employees. Horseplay or conduct that may be termed as disruptive or unsafe will not be permitted on-site.

Contractor and its subcontractors are not authorized to speak or act as an agent or representative on behalf of the Company.

Contractor and its subcontractors are required to immediately notify the Company Project Manager/contact in the event that any federal, state or other law enforcement or regulatory enforcement agency requests permission to inspect or enter the Contractor's worksite at a Company owned or leased facility or premise.

5. PERSONAL PROTECTIVE EQUIPMENT (PPE)

The contractor shall be responsible for assessing the hazards present before any work begins, requiring its employees to use appropriate PPE, and strictly enforcing its use. Contractors and their subcontractors are required to provide, wear, and use PPE consistent with any site-specific Williams' PPE requirements and applicable regulations. Contract personnel shall dress appropriately for the intended work. This includes wearing full-length pants and sleeved shirts. Loose-fitting or baggy clothing shall not be worn in areas where it could be caught in moving equipment. The following are not allowed:

- Shorts
- Sleeveless shirts
- Tank tops and/or wearing no shirt at all

In addition to specific project-related safety equipment, other equipment that may be required based on risk associated with the task may require the use of at least the following general safety equipment items:

- Hard hats;
- Safety glasses with side-shields,
- Hearing protection,
- Fall Protection,

- Gloves; and Protective footwear,
- Goggles and/or face shields,
- Body coverall (tyvex suits),
- Flame resistant clothing,
- Respirators/SCBAs (Contractor personnel must be fully trained on the

proper use and maintenance of this equipment.)

The contractor shall ensure personnel are familiar with the provided safety equipment and its limitations, use, and how it is to be inspected. The contractor is responsible for making sure that all protective equipment is inspected, well maintained, and in working condition at all times.

6. RESPIRATORY PROTECTION

Contractors involved in work that requires respiratory protection shall have a written respiratory protection program that conforms to the requirements contained in OSHA 29 CFR 1910.134. A written copy of the program shall be furnished to Williams upon request. The contractor is responsible for providing their own respiratory protection equipment, including any spare parts that may be necessary. Documentation of employee qualification training records, respiratory exams, and fit tests shall be made available to Williams upon request.

7. CONFINED SPACE ENTRY

Contractors involved in work that requires entry into a permit-required confined space shall have a written confined space entry program that conforms to the requirements contained in OSHA 29 CFR 1910.146. A written copy of the program shall be furnished to Williams upon request. In addition the following requirements apply:

The contractor must obtain a Confined Space Entry Permit from the Williams' project manager/ contact or delegate before entry into a confined space.

All contractors involved in confined space entry activities must provide certification of training documenting that each employee understands and has the skills necessary for safe performance of their assigned duties.

Contractors involved in confined space entry shall provide all PPE and retrieval equipment necessary for the type of entry being performed.

Contractors shall provide, maintain, and demonstrate the use of calibrated and appropriate air monitoring equipment prior to all confined space entries.

Contractor shall develop a site specific confined space emergency response plan and review the plan with personnel prior to entering the permit required confined space.

8. FIRE PREVENTION

When contractors are performing hot work a fire prevention plan shall be in place. Hot work includes but is not limited to welding, cutting torch, "weed burner," etc. The contractor must inform the Williams' project manager/contact or delegate before any hot work is needed to be performed. The contractor is responsible for working with the Williams' project manager/contact or delegate to ensure that necessary precautions are taken and implemented when hot work is performed. The fire prevention plan may include fire extinguishers, water hose, spark containment/control methods, etc. The contractor is responsible for providing all the items required by the fire prevention plan.

9. LOCKOUT/TAGOUT

Contractors involved in work that requires isolation of energy sources shall have a written lockout/tag-out program that conforms to the requirements of 29 CFR 1910.147. A copy of the program shall be furnished to Williams upon request. In addition, the following must be provided:

Documentation ensuring that personnel who will be involved with the lockout/tag-out process are properly trained in the specifics of the contractor's written equipment-specific lockout/tag-out procedures.

All lockout/tag-out activity must also conform and be consistent with Williams' lockout/tag-out procedure. It is the contractor's responsibility to coordinate any lockout/tag-out with the Williams' project contact or delegate.

The contractor shall provide and have available their own lockout equipment including locks, chains, and tags that may be necessary during the lockout procedure.

Lockout/tag-out devices including those installed by either Williams or the contractor are never to be bypassed, ignored, or otherwise defeated.

10. EXCAVATIONS

Contractors involved in work that requires excavations must have an Excavation and Trenching Safety Program that complies with 29 CFR, Part 1926.650 through .653. In addition, the contractor must:

Ensure that a competent person is available to oversee, monitor, and inspect any excavation site, and that the designated competent person is on-site whenever work is occurring in an excavation.

The competent person shall inspect excavations, the adjacent areas and protective systems for evidence of possible cave-ins, failures, hazardous atmospheres, or other hazardous conditions. Any employee exposed to a hazardous condition shall be removed from the area until necessary precautions have been taken.

The contractor's competent person must conduct inspections:

Each day prior to the start of work;

As needed throughout the shift; and

After a change in weather conditions (i.e., rainstorm, snow, etc.) or other possible hazard-causing event.

Locate buried utilities that may cross the proposed excavation prior to the start of any excavation. Locates shall be accomplished using the state "One-Call" system in coordination with Williams' personnel.

Determine the exact location of buried facilities by hand digging the final 18" or by other safe method when excavation approaches the estimated location of a buried structure. The contractor shall ensure that exposed underground facilities are properly supported and protected.

Provide ladders or sloped walkways for safe entrance and exit for personnel walking in trenches or excavations four (4) feet or more in depth. The contractor shall provide such means of entry and exit within 25 feet laterally from any point where employees are working in a trench.

No person will be permitted to work in excavations while heavy equipment is being operated nearby.

All materials and equipment must be kept at least two (2) feet from the excavation to protect employees for the hazard of material and/or equipment falling or rolling into the excavation.

11. ROAD-SIDE WORK

The contractor shall ensure that employees working in a public road right-of-way or otherwise exposed to vehicular traffic will be provided with, and instructed to wear, warning vests marked with (or made of) reflective or highly visible material. The contractor shall ensure that barricades, flaggers, cones, flashers, and warning signs are placed at strategic locations when working on or near roads and other areas where vehicular traffic may be a hazard. Signage and flashers must meet applicable local and state traffic requirements.

12. HAZARD COMMUNICATION

The contractor is responsible for establishing a Hazard Communication Program in accordance with the requirements of 29 CFR 1910.1200. Employee training documentation must be provided to Williams upon request. In addition, the contractor must:

Maintain an inventory and Material Safety Data Sheets (MSDS) for hazardous chemicals used or stored on site. Williams maintains copies of MSDS sheets for hazardous chemicals at each facility. Contractors may request MSDSs from the Williams' project manager/contact or from the Williams' Corporate Environmental, Health & Safety Department.

Identify chemical hazards, communicate chemical hazard information to its employees and Williams employees, and ensure that recommended and appropriate precautions, including PPE usage, are taken when working with hazardous chemicals.

Label contractor-owned chemical containers as to their content and hazards. Labeling shall comply with the requirements of OSHA 29 CFR 1910.1200.

13. WORKING IN ELEVATED WORK AREAS

The contractor is responsible for ensuring that all contract personnel are properly trained in the hazards of working in elevated positions in excess of 6 feet in height. The contractor will be responsible for providing affected employees with full body harnesses with lanyards, and ensuring that contractor employees who must work at heights where safe work platforms are not available use the equipment. Contractor-owned equipment, such as ladders and scaffolding, must be maintained and used in compliance with OSHA rules contained in 29 CFR 1910.25 – 1910.30 and approved for the type of work being performed.

14. INCIDENT REPORTING and INVESTIGATION

Contractors shall immediately or as soon as practical, notify the Williams' project manager/contact of all incidents involving contractor employees resulting in an OSHA recordable injury, spill/release of a hazardous material to the environment, fire/explosion, or damages in excess of \$5,000 while working on-site at a Corporate location. Contractors shall investigate and document all incidents and forward a copy to the Williams' project supervisor who will in turn forward it to the Corporate EH&S department within 48 hours of the accident. Upon request, the contractor shall furnish Williams with copies of all final incident investigations and supporting documentation. The contractor shall conduct post accident drug and alcohol tests for all accidents or injuries as required by the contractor's testing policy and/or as deemed necessary by Williams.

15. EVACUATION

The contractor shall be responsible for complying with (or establishing, if necessary) an emergency evacuation plan with the Williams' project manager/contact or delegate, prior to starting the project. All contractor employees will have a full understanding of the various emergency alarm sounds, what each alarm means, and what the most appropriate response will be to that particular alarm. The contractor is responsible for communicating the emergency evacuation plan to its employees, and for ensuring that all contractor employees follow the plan in the event of an alarm.

16. REPORTING UNSAFE CONDITIONS

Contractors have the responsibility to make sure safe work conditions are maintained at the work site at all times. Contractor employees shall promptly report to the Williams' project supervisor any unsafe condition or work practice. The contractor will be responsible for ensuring the reported condition is satisfactorily addressed.