

2021 Williams Way to Wellness Incentive Program Rules

Program Rules:

Incentive: Participation in the 2021 Williams Way to Wellness Incentive Program (the “Program” or the “Wellness Program”) is completely voluntary. Employees who choose to participate in the Program will receive up to a \$300 annual medical premium discount if they complete the required criteria described below by the applicable stated deadlines and are active participants in The Williams Companies, Inc. Group Medical-Health Plus Plan for Full-Time Employees or The Williams Companies, Inc. Group Medical-Health Plus Plan for Part-Time Employees (collectively, the “Medical Plan”) for the 2022 plan year. Employees will receive up to an additional \$300 annual medical premium discount if their eligible spouse or domestic partner chooses to participate in the Program, completes the required criteria described below by the applicable stated deadlines, and is an active Medical Plan dependent for the 2022 plan year. In addition, eligible employees will be eligible to participate in Amazon gift card drawings.

Employees who qualify for the incentive will see the incentive reflected during Annual Enrollment as a wellness credit and on each applicable paystub. The premium discount for both employee participation and spouse or domestic partner participation will be credited to the associated employee over 24 paychecks. No lump sum payments or credit balances will be issued. With respect to the Amazon gift card drawings, the value of the gift cards may be subject to certain taxes and withholding requirements. In the discretion of the company, the company may pay certain of these taxes on behalf of the employee. In order to receive the incentive payout, on the date of distribution, you must be an eligible employee, as described below, or the spouse or domestic partner of an eligible employee.

Incentive for Dual Employee Households: Williams has many employees who are part of a company couple and eligible either through marriage or domestic partnership to enroll in each other’s Medical Plan as dependents. If both employees are eligible and meet the criteria set forth below, Williams will provide the incentive to each regardless of whether they enroll in the Medical Plan as an employee or as a spouse or domestic partner. Therefore, the incentive would be a \$600 discount if enrolled as employee + spouse/domestic partner, or employee + family; or a \$300 discount if enrolled as employee only, or employee + children. If an employee is covered under the Medical Plan as a child of another employee, no incentive will be payable with respect to such child even though he or she is an employee of Williams.

Required Criteria for Incentive Eligibility: Employees, spouses or domestic partners who meet the eligible employee, spouse or domestic partner definition may complete certain activities to receive the Medical Plan premium discount in 2022. Employees may earn up to \$300 off 2022 Medical Plan premiums. Spouses and domestic partners may also earn up to \$300 off 2022 Medical Plan premiums. Completed and submitted health screenings and health surveys are required to earn all incentives. ***Employees and spouses or domestic partners are not required to complete the health survey or health screenings. However, if the employee, spouse or domestic partner chooses to do so, completion of the health survey***

and/or participation in the health screening will constitute written, voluntary authorization for the Wellness Program to collect the individual's medical information.

IMPORTANT NOTE ABOUT MISSION ACTIVITIES AND CHALLENGES: There are two types of activities included in the Williams Way to Wellness Program – self-tracked and verified. For self-tracked activities*, you must join the activity, complete the listed requirements, and track completion – all within the specific mission activity or challenge tile. For verified events, the requirements will be outlined in the specific mission activity or challenge tile, however, participation will be verified automatically through the site or by a third-party upon completion of the requirements (for example, rewards will be awarded automatically once screening results are loaded to the Rally site). Be aware, there may be a delay in awarding rewards for verified activities after activity completion.

Mission activities and challenges include nutrition, stress, work-life balance, preventive screenings, safety, social/family time, physical activity, etc. Point values, required effort, and tracking vary for each activity. You must join the applicable mission activity or challenge and complete required tracking to earn rewards*. Failure to enroll or track progress will result in rewards not being awarded. You must enroll and track progress online on the Williams Wellness Program portal found via the link.

***If you track activities using a tracking device, it is your responsibility to ensure that your tracking device is properly syncing and loading your data into the Rally website.**

Period	Data Source	Activity	Medical Plan Participants \$300 Premium Discount	Medical Waives Tracking Only (Premium Discount would be applied if employee becomes medical plan participant)
1/1/21 – 9/30/21	Assessment: Rally (10-15 min) Biometric Screening: Quest/Rally	Dual Gatekeeper: Health Assessment Completion AND Biometric Screening Completion (onsite or provider)	\$100 (Entry into sweepstakes at the end of the program)	\$100 (Entry into sweepstakes at the end of the program)
1/1/21 – 9/30/21	Rally	Register AND Health Assessment Completion	Entry into Sweepstakes at the end of program	Entry into Sweepstakes at the end of program
1/1/21- 9/30/21 (look back to 10/1/20)	UHC Claims (CPT Code)	Age/Gender Strat. Preventative Cancer Screening (Mammogram, Cervical, Colorectal, Prostate)	\$25	N/A
1/1/21 – 9/30/21 (look back to 10/1/20)	UHC Claims (CPT Code) Maternity Support Program	Complete BOTH of the following: Prenatal Exam AND Enroll Maternity Support Program	\$25	N/A
1/1/21 – 9/30/21	HealthCare Cost Estimate	Complete a HealthCare Cost Estimate	\$10	N/A
1/1/21 – 9/30/21 (look-back to 10/1/20)	Real Appeal Program (9 sessions)	Real Appeal program (complete 9 sessions)	\$25	N/A
1/1/21- 9/30/21 (look-back to 10/1/20)	DM Program	Disease Management Program: Asthma, CAD, COPD, CHF, & Diabetes)	\$25	N/A
1/1/21- 9/30/21	Virtual Visit	Virtual Visit Complete	\$10	N/A
Quarterly Q1 – Q3	Rally/ Self-Entry (min. 4 weeks)	Rally Missions	Q1 2021 \$10 per Mission (up to \$50 Per Quarter Max) Q2 & Q3 Complete <u>any</u> 3 Missions to earn \$50 per quarter (must complete at least 3 Missions to earn the \$50)	Q1 2021 \$10 per Mission (up to \$50 Per Quarter Max) Q2 & Q3 Complete <u>any</u> 3 Missions to earn \$50 per quarter (must complete at least 3 Missions to earn the \$50)
Quarterly Q1 – Q3	Rally/Tracker/ Self-Entry Optional (3 days – [TBD private challenge length])	Complete a Challenge	\$5 Per Challenge (\$25 Per Quarter Max)	\$5 Per Challenge (\$25 Per Quarter Max)

Accommodations: Rewards for participating in the Wellness Program are available to all eligible employees and their spouses or domestic partners who are enrolled in the Williams Medical Plan. If you think you might be unable to meet a standard for a reward under this Program, you might qualify for an opportunity to earn the same incentive by different means. Contact williamsway2answers@williams.com and we will work with you (and, if you wish, with your doctor) to find a different means for you to qualify for the incentive. You must make the request within a reasonable period of time prior to the September 30 deadline to allow for completion of the alternative standard. This Program complies with the Health Insurance Portability and Accountability Act, and the information you provide will only be used for purposes of the Program and the Medical Plan. Your individually identifiable health information that is provided in connection with the Wellness Program health assessment or biometric screening will not be provided to your supervisors or managers and may never be used to make decisions regarding your employment. Williams may receive aggregated de-identified health information from the Wellness Program health assessment or biometric screening in order to assist it in administering the Wellness Program and its group medical plans. Employees of Williams who are involved with the administration of the Medical Plan may also receive individually identifiable information associated with participation in the Wellness Program for purposes of administering claims and appeals. Williams reserves the right to amend or terminate the Wellness Program at any time.

Program Timeframe and Deadline: The Program period will run from January 1, 2021, through December 16, 2021. All rewardable activities must be completed as instructed and received by Rally by September 30, 2021, to be considered eligible for premium discounts.

Eligible Employee Definition: All active employees and certain employees on a leave of absence, as described in the chart below, are eligible to participate in the Program. To be eligible for the premium discount incentive, you must be an eligible employee, enrolled in the Williams Medical Plan and have completed the requirements by stated deadlines. To be eligible for the drawings, you must be an eligible employee, described in the chart below, and have completed the requirements by stated deadlines. You are not required to be enrolled in the Williams Medical Plan to be eligible for drawings. Specific eligibility for employees is discussed in more detail in the table below.

Eligible Spouse and Domestic Partner Definition: To be eligible for the Program and incentives, you must be a current spouse or domestic partner of an eligible employee, as described in the chart below, be enrolled in the Williams Medical Plan and have completed the requirements by the stated deadlines. Surviving spouses and surviving domestic partners are not eligible for the Program or Program incentives. Specific eligibility for spouses and domestic partners is discussed in more detail below.

New Hires: Employees hired after August 31, 2021, will not be eligible to participate in the Program to receive the premium discount. Employees hired in September 2021 will however, be eligible to participate in the Amazon gift card drawings if required activities including the biometric screening and health assessment are completed by September 30, 2021. Employees hired after September 30, 2021, will not be eligible to participate in the 2021 Program. The aforementioned timeline and requirements for new

hires also applies to spouses or domestic partners covered as dependents on the new hire employee's medical coverage under the Williams Medical Plan.

Specific Eligibility Situations:

	Eligibility to Participate in Program	Eligibility to Receive Incentive Credits
Individuals on LTD and Workers Compensation Leave (extending beyond approximately 26 weeks)	No	No
Individuals on FMLA Leave (paid and unpaid)	Yes	Yes
Individuals on STD and Workers Compensation Leave less than approximately 26 weeks	Yes	Yes
Individuals on Military Leave being paid by Williams and receiving coverage on the same terms as an active employee	Yes	Yes
Individuals on Military Leave not being paid by Williams and not receiving coverage on the same terms as an active employee	No	No
Individuals on Personal, Educational or other Unpaid Leave	No	No
Retirees	No	No
Individuals on COBRA	No	No
Interns	No	No
Temporary Employees	No	No
Independent Contractor	No	No
Surviving Spouse or Surviving Domestic Partner	No	No

Termination of Incentive: For all participants, including both employees and spouses/domestic partners, any incentive or remaining balance of incentive will be forfeited on the date an eligible employee or spouse/domestic partner ceases to meet the definition of eligible employee or spouse/domestic partner, as applicable. The incentive is not available for those who are covered under COBRA or a Retiree Medical Plan offered by Williams. If the participant becomes eligible again during the plan year, they may resume participation and receive the incentive credit prospectively.

Disclaimer: This Program is void where prohibited by applicable law. While every effort has been made to ensure the information contained in this communication is correct, if there is any omission or misstatement, the applicable legal plan document(s), policy(ies) or Program(s) will control. The eligibility for any benefit will be governed by the terms of the applicable benefit plan, Program or policy. The plan administrator (and its designee or the insurer or claims administrator, as applicable) has the power, including, without limitation, discretionary power to make all determinations that the plan(s) require for its administration, and to construe and interpret the plan(s) for purposes of determining eligibility and benefits. Williams or the applicable plan entity/committee as detailed in the applicable benefit plan, as applicable, reserves the right to amend, modify or terminate any plan(s) or benefit policies or Programs in whole or in part at any time. The employee benefit policies, programs and plans are not individually or collectively an employment contract and do not give any employee any right to be retained in the services of the company. The information in this communication is not medical advice, and it is not intended to replace the advice of your physician. The information is intended to help you take greater responsibility for your own health, to work with your personal physician, and to make better health and wellness decisions.

Claim and Appeal Information: If a participant is dissatisfied with Rally's determination with respect to his or her eligibility to participate or satisfaction of the requirements to receive the wellness incentive, the participant may submit a written claim to the appropriate Claims Administrator at the following address:

Health and Group Benefits Delegate
of the Administrative Committee
PO Box 2400, MD 42
Tulsa, OK 74102
Fax # 918-732-1808

Keep in mind that all claims with respect to eligibility or satisfaction of Program requirements must be submitted within one year of the applicable Program timeframe (premium discount claims must be submitted by September 30, 2022 and gift card claims must be submitted by December 17, 2022).

If a participant is dissatisfied with an adverse benefit determination (denial) of the claim, the participant may submit a written appeal to the Plan Administrator at the following address:

The Administrative Committee
PO Box 2400, MD 42
Tulsa, OK 74102
Fax # 918-732-1808

All appeal requests must be made within 180 days of the date you receive notice of the adverse benefit determination with respect to your claim. Any review will take into account all comments, documents, records and other information you submit relating to the appeal, even if it was not submitted or considered in the initial claim determination. Your written appeal communication should include:

- The participant's legal name;
- A detailed description of the events surrounding your claim situation including, but not limited to, the facts of the situation, any corrective actions taken, your rationale for bringing the claim, and any other facts or circumstances to justify your claim; and
- Any documentation or other written information to support your request.

For full information on the appeal process, please refer to the current Summary Plan Description (SPD). If you want to bring a legal action against the Company, its subsidiaries, affiliates, employees, officers or directors, the Plan Administrator, applicable Claim Administrator, or insurance company, as applicable, you must do so within three years from the earlier of (i) the expiration of the time period in which a request for reimbursement must be submitted or you lose any rights to bring such an action against such individuals and/or entities or (ii) the date you are notified of our final decision on your appeal or you lose any rights to bring such an action against such individuals and/or entities.

Additional Information:

Williams Wellness Program Website: www.williamswellnessprogram.com and click on the blue “Williams Wellness Program” button.

[Wellness Notice and Authorization](#)

Questions? Contact Williams Way to Answers via email: williamsway2answers@williams.com

Revised April 1, 2021