



Prohibiting Workplace Discrimination and Harassment Policy

Applicability	<p>This policy applies to all employees, applicants for employment, interns, whether paid or unpaid, contingent workers, vendors, customers, visitors to our facilities, and all other persons conducting business with Williams. In the remainder of this document, the term "covered persons" refers to this collective group. This policy also applies to all aspects of employment including, without limitation, to recruitment, hiring, compensation, promotions, transfers, discipline, demotions, terminations, and access to benefits and training.</p>
Purpose	<p>Consistent with our Core Values, Code of Business Conduct, and our legal obligations, we are committed to providing an inclusive work environment for all covered persons that is free of unlawful discrimination and harassment. Unlawful discrimination and harassment is a form of misconduct that damages our work environment and undermines the integrity of the employment relationship. We are committed to providing a work environment that is free of unlawful discrimination and harassment and will not tolerate any violation of this policy.</p>
Policy	<p>Williams is an equal opportunity employer committed to complying with all applicable anti-discrimination laws. Williams prohibits and does not tolerate unlawful discrimination against any covered persons on the basis of race, color, religion, national origin, ancestry, sex (including pregnancy), gender (including sexual orientation), gender identity, and status as a transgender or transsexual individual), age, physical or mental disability, citizenship, genetic information, past, current, or prospective service in the uniformed services, marital status, or any other characteristic protected under applicable federal, state, or local law.</p> <p>Williams further prohibits and does not tolerate unlawful harassment against any covered persons because of race, color, religion, national origin, ancestry, sex (including pregnancy), gender (including sexual orientation), gender identity, and status as a transgender or transsexual individual), age, physical or mental disability, citizenship, genetic information, past, current, or prospective service in the uniformed services, marital status, or any other characteristic protected under applicable federal, state, or local law.</p> <p>Reporting Workplace Discrimination and Harassment</p> <p>It is every covered person's responsibility to promptly report any incidents of suspected discrimination or harassment so that appropriate action may be taken. Anyone who witnesses or becomes aware of incidents of potential discrimination or harassment has an obligation to report such behaviors to:</p> <ul style="list-style-type: none">• A member of leadership,• Their Human Resources Business Partner,• The Business Ethics Resource Center,



	<ul style="list-style-type: none">• Employee Relations at employeerelations@williams.com, or• The Williams Action Line at 800-324-3606 or online at www.williams.ethicspoint.com. <p>Individuals may report allegations to any of the resources listed above, regardless of the chain of command, and can report anonymously via the Action Line.</p> <p>Leaders have an obligation to report discriminatory or harassing conduct of which they become aware. Leaders who observe such conduct or who receive any complaints of potential misconduct must report the conduct or complaint promptly to their Human Resources Business Partner so that an investigation and/or appropriate action may be initiated.</p> <p>The Company may also subject managers and supervisors who fail to promptly report suspected, known, or reported discrimination or harassment to disciplinary action, up to and including termination of employment.</p> <p>Prohibition Against Retaliation</p> <p>The Company will not tolerate retaliation against any covered person for making a complaint of discrimination or harassment in good faith or for cooperating in an investigation. Appropriate disciplinary action will be taken against any individual who interferes with an investigation or engages in retaliation in violation of this policy.</p> <p>If discrimination, harassment, or retaliation in violation of this policy is established, the Company will take appropriate corrective action, up to and including termination of employment. Third parties found to have acted in violation of this policy will be subject to removal from the premises and discontinuance of any business relationship.</p>
Consequences / Penalty for Non- Compliance	Adherence to this Policy is mandatory. Non-compliance may result in disciplinary action, up to and including termination.
Reservation of Rights	The Company reserves the right to interpret, modify, terminate, or revise this Policy in whole or in part, without notice. Statements within this Policy regarding conduct that may result in discipline do not limit, in any way, the Company's right to discipline employees for conduct not specifically described above. In addition, this Policy shall not be construed as an employment contract or to alter any employee's at-will status. Employees and the Company remain free to terminate the employment relationship at any time, with or without cause or notice. Similarly, the Company reserves the right to terminate an employee with or without the use of progressive discipline.



Terms and Definitions	
Discrimination	Unfair or unfavorable treatment on the basis of race, color, religion, national origin, ancestry, sex (including pregnancy), gender (including sexual orientation, gender identity, and status as a transgender or transsexual individual), age, physical or mental disability, citizenship, genetic information, past, current, or prospective service in the uniformed services, marital status, or any other characteristic protected under applicable federal, state, or local law.
Harassment	Harassment of any kind, including sexual harassment, includes, but is not limited to, verbal, physical, visual, and online conduct, or written or electronic material, designated to threaten, intimidate, or coerce covered persons. This policy prohibits any conduct that a reasonable person in the individual's circumstances would consider unwelcome, intimidating, hostile, threatening, violent, abusive, or offensive.
Harassing Conduct	Harassing conduct can take many forms and includes, but is not limited to, the following: slurs, epithets, jokes, pictures, cartoons, derogatory statements, gestures, threats, assault, unwelcome physical contact, online postings, or other conduct that interferes with an individual's normal work performance. This list is illustrative only and not exhaustive. No form of harassment will be tolerated.
Retaliatory Conduct	<p>Retaliatory conduct can take many forms and is unfair or unfavorable treatment, including but not limited to, the following:</p> <ul style="list-style-type: none">• Adverse action or threat of adverse action taken against a covered person for making a complaint of discrimination or harassment in good faith or for cooperating in an investigation• Termination, demotion, non-promotion, or non-selection• Harassing behavior• Significant changes to job duties, working conditions, or reduction of work hours
Sexual Harassment	<p>Sexual harassment is a form of harassment based on a covered person's sex or gender and includes, but is not limited to, harassment that is not sexual in nature (for example, offensive remarks about an individual's sex and gender), and the following types of conduct:</p> <ul style="list-style-type: none">• Unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature when such conduct is made explicitly or implicitly a term or condition of employment, is used as a basis for an employment decision, or unreasonably interferes with an employee's work performance or creates an intimidating, hostile or otherwise offensive environment. <p>Sexually harassing conduct can be by a person of either the same or opposite sex.</p> <p>Sexual harassment may consist of different forms. The following are examples of sexual harassment:</p> <ul style="list-style-type: none">• Physical harassment including, but not limited to, unwelcome physical contact such as touching, impeding or blocking movement, or any physical interference with work;• Verbal harassment including, but not limited to, disparaging or disrespectful comments, jokes, slurs, innuendoes, teasing, and



Prohibiting Workplace Discrimination and Harassment Policy

	<p>other sexual talk such as jokes, personal inquiries, persistent unwanted courting, and derogatory insults;</p> <ul style="list-style-type: none">• Nonverbal harassment including, but not limited to, suggestive or insulting sounds, obscene gestures, leering, or whistling;• Visual harassment including, but not limited to, displays of explicit or offensive calendars, circulation of derogatory content, posters, pictures, drawings, or cartoons that reflect disparagingly upon a class of persons or a particular person;• Online (for example, derogatory statements or sexually suggestive postings in any social media platform including Facebook, Twitter, Instagram, Snapchat, etc.).
Related Documents	<p>Equal Employment Opportunity Workplace Violence Risk Reduction and Response Conflict Resolution Policy</p>