



Ethics and Compliance Policy	
Related Documents	Code of Business Conduct
Applicability	This policy applies to all employees of the Company.
Policy	<p>Williams is committed to conducting its business at a level consistent with the highest standards of ethics and compliance. Consistent with this commitment, employees are required to act as follows:</p> <ol style="list-style-type: none">1. Employees must comply with all governmental laws and regulations.2. Employees must understand and comply with Williams' ethical standards (including the Core Values and Beliefs and Code of Business Conduct and company policies/standards) relevant to their job.3. Employees must take appropriate steps to resolve business conduct issues. <p>In addition to the responsibilities imposed on all employees by this policy, the Corporate Compliance Officer is responsible for ensuring the effectiveness of Williams' Ethics and Compliance Program. Williams will promptly investigate all alleged violations of law or its policy and, where appropriate, will take corrective action including, where appropriate, disciplinary measures up to and including termination.</p>
Consequences / Penalty for Non-Compliance	<p>Adherence to standards is mandatory. Non-compliance with this policy may result in disciplinary action, up to and including termination.</p> <p>A violation, or suspected violation, of this policy or standard should be reported to your manager, your Human Resources Business Partner, the Business Ethics Resource Center, or the Williams Action Line.</p>
Reservation of Rights	<p>The Company reserves the right to interpret, modify, terminate, or revise this policy or standard, in whole or in part, without notice. Statements within this policy or standard 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 or standard 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.</p>