

[About EthicsPoint](#)

[Reporting – General](#)

[Reporting Security & Confidentiality](#)

[Tips & Best Practices](#)

About EthicsPoint

What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool that works with the Williams Action Line to assist leaders and employees to work together to address fraud, abuse, and other misconduct in the workplace, all while cultivating a positive work environment.

Why do we need a system like EthicsPoint?

Our employees are our most important asset. By creating open channels of communication, we can promote a positive work environment and maximize productivity. At Williams, we hope this tool provides an effective reporting system to supplement our other efforts and to foster a culture of integrity and ethical decision-making.

Reporting – General

May I report using either the Internet or the telephone?

Yes. With the Williams Action Line (through EthicsPoint), you have the ability to file a confidential, anonymous report via the telephone (Action Line toll free number is 1-800-324-3606) or make an online report at williams.ethicspoint.com.

What type of situations should I report?

The Williams Action Line (through EthicsPoint) is designed for employees and other interested parties to report any violation of our Code of Business Conduct, or other concern you may have.

If I see a violation, shouldn't I just report it to my manager, security, or human resources and let them deal with it?

When you have a concern regarding safety, ethics or business conduct, we expect you to report it. Ideally, you should bring any concerns forward to your next level of management, your HR business partner, or the Williams Business Ethics Resource Center at 918-573-3284. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. It is for such circumstances that we have partnered with EthicsPoint to offer the Williams Action Line. You are welcome to call the Williams Action Line at 1-800-324-3606 or make an online report at williams.ethicspoint.com and you can choose to be anonymous if you'd like.

Why should I report what I know? What's in it for me?

Integrity is the foundation of our Williams Core Values and Beliefs. We all have the right to work in a positive environment and with that right comes the responsibility of acting in an ethical manner and letting the appropriate people know if someone is not acting appropriately. By working together, we can maintain a healthy and productive environment.

Does management really want me to report?

We certainly do. In fact, we *need* you to report. You know what is going on in our company - both good and bad. You may have initial knowledge of an activity that may be cause for concern. Your reporting can minimize the potential negative impact on the company and our people. Also, offering positive input may help identify issues that can improve corporate culture and performance.

Where do these reports go? Who can access them?

Reports are entered directly on the EthicsPoint secure server to prevent any possible breach in security. EthicsPoint makes these reports available only to specific individuals in the Williams Business Ethics Resource Center who keep these reports in the utmost confidence, and are responsible for evaluating and investigating the concern.

Isn't this system just an example of someone watching over me?

No. The Williams Action Line is a positive aspect of our overall philosophy, and allows us to assure a safe, secure, and ethical workplace. Seek guidance whenever you have an ethical dilemma, have positive suggestions, or want to communicate a concern. Effective communication is critical in today's workplace and this is a great tool to enhance that communication.

Reporting - Security & Confidentiality

It is my understanding that any report I send from a company computer generates a server log that shows every web-site that my PC connects with, and won't this log identify me as a report originator?

EthicsPoint does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to EthicsPoint is available. In fact, EthicsPoint is contractually committed to not pursue a reporter's identity.

If you feel uncomfortable making a report on your work PC, you have the option of using a PC outside our work environment (such as one located at an Internet café, at a friend's house, etc.) through the EthicsPoint secure website. Many people choose this option, as EthicsPoint's data shows that fewer than 12% of reports are generated during business hours.

Can I file a report from home and still remain anonymous?

A report from home, a neighbor's computer, or any Internet portal will remain secure and anonymous. An Internet portal never identifies a visitor by screen name and the EthicsPoint system strips away Internet addresses so that anonymity is totally maintained. Plus, EthicsPoint is contractually committed to not pursue a reporter's identity.

Are reports to the toll-free Williams Action Line telephone number confidential and anonymous too?

Yes. You will be asked to provide the same information that you would provide in an Internet-based report and an interviewer will type your responses into the EthicsPoint Web site. These reports have the same security and confidentiality measures applied to them during delivery.

What if I want to be identified with my report?

There is a section in the report for identifying yourself, if you wish.

Tips & Best Practices

I am aware of some individuals involved with unethical conduct, but it doesn't affect me. Why should I bother reporting it?

Our company promotes and supports ethical behavior. All unethical conduct, at any level, ultimately hurts all of us. You only have to consider what happened in recent corporate scandals to see the disastrous effects that a seemingly harmless lapse in ethics can have on an otherwise healthy company. So if you know of any incidents of misconduct or ethical violations, consider it your duty to yourself and your coworkers to report it.

I am not sure if what I have observed or heard is a violation of company policy, or involves unethical conduct, but it just does not look right to me. What should I do?

File a report. EthicsPoint can help you prepare and file your report so it can be properly understood. Then, the situation can be properly evaluated to determine if there is any wrongdoing. We'd rather you report a situation that turns out to be harmless, than let possible unethical behavior go unchecked because you weren't sure.

What if my boss or other managers are involved in a violation? Won't they get the report and start a cover-up?

The EthicsPoint system and report distribution are designed so that implicated parties are not notified or granted access to reports in which they have been named.

What if I remember something important about the incident after I file the report? Or what if the company has further questions for me concerning my report?

When you file a report with the Williams Action Line telephone number or through the online williams.ethicspoint.com web site, you receive a unique user name and are asked to choose a password. You can return to the EthicsPoint system again either by Internet or telephone and access the original report to add more detail or answer questions posed by a company representative and add further information that will help resolve open issues. We strongly suggest that you return to the site in the time specified to answer company questions. You and the company now have entered into an "anonymous dialogue," where situations are not only identified, but can also be resolved, no matter how complex.

Are these follow-ups on reports as secure as the first one?

All Williams Action Line correspondences are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity.

Can I still file a report if I don't have access to the Internet?

You can file a Williams Action Line online report from any computer that can access the Internet. You can file from home. Many public locations, including the public library, have Internet computers. If you don't have access to or are uncomfortable using a computer, you can call the Williams Action Line toll-free at 1-800-324-3606, 24 hours a day, 365 days a year.