

## Subject: ANTI-HARASSMENT & NON-DISCRIMINATION

Policy No. OKEhr\_1.0027  
Owner Director – Talent Management

Date Issued Pre-2001

Date Revised 05/11/2021

Date Reviewed 05/11/2021

### Purpose/Expectation

As part of its commitment to promote a productive work environment, ONEOK, Inc. and its subsidiaries and affiliates prohibits discrimination and harassment of or by employees, in any manner, on the basis of race, color, sex (with or without sexual conduct), pregnancy, sexual orientation, age, religion, creed, national origin, gender identity, disability, military/veteran status, genetic information, other categories protected by applicable law, or protected activity (e.g., voicing opposition to prohibited discrimination, filing a charge of discrimination with the EEOC, making an internal report of harassment, participating, testifying, or assisting in an EEOC/Company investigation). Those who violate this policy, including supervisors and co-employees will be subject to appropriate disciplinary action, up to and including termination.

### Applicability/ Exceptions

Applies to all employees. The scope of this policy also applies to vendors, temporary employees and contingent workers, contractors, leased employees, and outside visitors.

### Policy

#### WHAT IS HARASSMENT?

Harassment is defined as a course of comments or actions that are unwelcome, or should reasonably be known to be unwelcome, to the person towards whom they are addressed. Non-sexual harassment includes but is not exclusive to bullying and intimidation. Sexual harassment includes but is not exclusive to offensive remarks about a person's sex and unwelcome sexual advances, requests for sexual favors, and other verbal or physical harassment of a sexual nature.

#### WHAT IS DISCRIMINATION?

Discrimination is defined as unequal treatment of different people or groups on the basis of race, color, sex, pregnancy, sexual orientation, age, religion, creed, national origin, gender identity, disability, military/veteran status, genetic information, other categories protected by applicable law or any of those aspects in the person's relatives, friends, or associates. Discrimination can include both sexual and non-sexual harassment.

#### EXAMPLES OF PROHIBITED CONDUCT

- Threatening or insinuating, either explicitly or implicitly, that an employee's refusal or willingness to submit to sexual advances will affect the employee's terms or conditions of employment.
- Engaging in unwanted physical contact or conduct of any kind, including inappropriate touching.
- Verbally harassing others with lewd comments, sexual jokes or references that may be perceived as offensive, demeaning, insulting or intimidating based on the categories mentioned above. Displaying in the workplace demeaning, insulting, intimidating, or sexually suggestive objects, pictures, drawings, graffiti, or photographs.
- Transmitting demeaning, insulting, intimidating, or sexually suggestive messages, in any way, including via telephone, voice mail, computer, e-mail, internet access, regular or Company mail, or any other means.
- Treating individuals unequally by imposing unequal burdens based on the categories mentioned above.

#### EMPLOYEE EDUCATION

Anti-harassment and non-discrimination training regarding the Company's policy, reporting systems and investigation process is provided on a recurring basis and is required of all employees.

#### INDIVIDUAL RESPONSIBILITY & REPORTING

To enforce this policy, ONEOK relies on the full cooperation of its employees to bring any incident to the immediate attention of the Company because many times discrimination or harassment is private in nature and difficult for the Company to detect. Therefore, if any employee believes that he/she or a coworker is being discriminated against or harassed, the employee should immediately report the incident to any of the following people with whom they feel comfortable reporting such matters: their supervisor, vice president, members of the human resources department, the Administrator of the ONEOK Corporate Compliance Program, or the ONEOK Hotline (888-393-6825). Discrimination and/or harassment may be reported to the ONEOK Hotline 24 hours/day, seven days/week.

Supervisors, managers, and officers who observe or who are informed of any discrimination or harassment shall immediately notify a member of the Human Resources Department or the Administrator of the ONEOK Corporate Compliance Program of a possible harassment situation so that a prompt investigation will be initiated.

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### INVESTIGATION

Complaints will be investigated promptly, impartially, and as confidentially as practicable consistent with the effective conduct of an investigation. The investigation will allow both the complainant and the accused the opportunity to be heard. Employees are required to fully cooperate in any investigation. To facilitate the investigation, employees may be requested to absent themselves from the workplace with pay while an investigation is underway. Such suspensions are not a disciplinary measure and will not be noted in the personnel file. Each situation will be evaluated on a case by case basis taking into account the severity or pervasiveness of the conduct, whether it was a single instance or a pattern of conduct, whether supervision was involved, whether there was a tangible job consequence, the nature of the harassment, the credibility of the parties and witnesses and any other factor the investigator believes may reasonably be considered. If the investigator determines that discrimination or harassment has occurred, then the Company will take prompt and appropriate corrective action, up to and including termination, if warranted, against the party responsible for the discrimination or harassment.

### NON-RETALIATION POLICY

The Company prohibits any form of retaliation against employees for bringing complaints in good faith, providing information about discrimination or harassment, or cooperating in an investigation of discrimination or harassment.