



# ONE WAY TO PARTNER

BUSINESS PARTNER CODE OF CONDUCT

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# Welcome to ONEOK

Every day at ONEOK, we're powering life – providing the safe, reliable energy that helps our customers and communities thrive. The work we do is vital to everyone we serve. That's why we hold ourselves and everyone we work with to the highest standards of ethics and integrity.

As a ONEOK business partner, whether a supplier (goods or services), consultant, vendor, contractor, agent or other third-party provider, you act as an extension of our business. For that reason, you share the responsibility to work ethically and continually reflect our Mission, Vision and Core Values. This Business Partner Code of Conduct ("Business Partner Code") will guide you throughout our partnership.

The Business Partner Code is here to help you follow the laws that apply to us and meet ONEOK's standards and practices for business partners. We ask that you familiarize yourself with the Business Partner Code, which can help you navigate situations that might come up while working with us. If anything is unclear, look to the Business Partner Code for key ONEOK resources and contacts for guidance.

Thank you for your commitment to the **ONE Way to Partner** and all you do to carry on ONEOK's legacy of integrity.



# Live Our Values

Every action we take at ONEOK is inspired by our Core Values, which form the foundation of our company and express what's most important to us. It's up to each of us to bring these ideals to life.



## Mission: Why we exist

We deliver energy products and services vital to an advancing world.



## Vision: What we want to be

To create exceptional value for our stakeholders by providing solutions for a transforming energy future.



## Core Values: Our compass



### Safety and Environmental

We **commit** to a zero-incident culture for the well-being of our employees, contractors and communities and to operate in an environmentally responsible manner.



### Ethics

We **act** with honesty, integrity and adherence to the highest standards of personal and professional conduct.



### Diversity and Inclusion

We **respect** the uniqueness and worth of each employee, and believe that a diverse, inclusive workforce is essential for a sense of belonging, engagement and performance.



### Excellence

We **hold** ourselves and others accountable to a standard of excellence through continuous improvement and teamwork.



### Service

We **invest** our time, effort and resources to serve each other, our customers and communities.

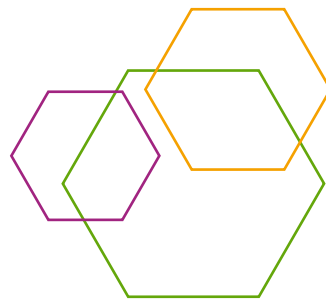


### Innovation

We **seek** to develop creative solutions by leveraging collaboration through ingenuity and technology.

# BUILD OUR PARTNERSHIP, FOLLOW OUR BUSINESS PARTNER CODE

The theme of our Code is “**ONE Way to Partner.**” It doesn’t mean there’s only one way to achieve success with us – we welcome your collaboration and unique contributions. We simply recognize the value of working with business partners who share our unwavering commitment to integrity.



## About This Business Partner Code

As our business partner, the way you work reflects on ONEOK's business. When you give **your** best, we can give others **our** best. Our Business Partner Code helps you along the way. It's not intended to take the place of our contracts with business partners – it's designed to strengthen and maintain our relationships with any organization that provides us with goods or services or represents ONEOK in any way.



## What to Expect, and What's Expected of You

### **We hold every business partner to the same criteria and expect you to:**

- › Operate in compliance with ONEOK's expectations, our Core Values and the law.
- › Read and carefully follow this Business Partner Code, which aligns with ONEOK's employee Code of Business Conduct and Ethics.
- › Communicate to your employees and business partners about what is expected.
- › Adopt responsible and ethical business practices throughout your operations and supply chain.
- › Protect the human rights of workers and provide a safe, healthy work environment.
- › Help us operate in a responsible manner by minimizing your environmental impact.
- › Speak up to a ONEOK resource when you have questions or concerns.

### **We understand that a good relationship is a two-way street. As your partner, ONEOK is committed to:**

- › Acting as a trusted business partner, upholding the law and the highest ethical standards.
- › Treating you and all our business partners fairly and with respect.
- › Maintaining open and regular communications with you.
- › Providing you with dedicated and experienced ONEOK staff to properly manage our relationship.
- › Protecting your confidential information and intellectual property.

## Complying With Laws

Our business is complicated, and a variety of laws apply. We're committed to following them and expect our business partners to do the same. That includes fulfilling your contractual obligations and complying with this Business Partner Code and all applicable laws, regulations, guidelines and industry standards.

If a contract provision, local law or requirement ever conflicts with a requirement in our Business Partner Code, we expect you to follow the more restrictive requirement. If you're not sure which requirement is more restrictive, seek guidance before proceeding.

Be aware that ONEOK may monitor our business partners' compliance with this Business Partner Code. We also take violations seriously. In fact, we may take legal action against or terminate our relationship with a business partner that violates our Business Partner Code or the law when working on ONEOK's behalf.



## Reporting Concerns

When our business partners have questions or concerns, we want to hear them. Whether it's a question about our Business Partner Code, policies or the law, or a concern about potential violations related to our work together, ONEOK both welcomes and expects business partners to speak up.

Feel free to report any concerns to your contact at ONEOK or by contacting [ONEOK Compliance and Ethics](#). An alternative resource is the ONEOK Hotline, which is available:



By phone at  
**888-393-6825**



Or online at  
[secure.ethicspoint.com](https://secure.ethicspoint.com)

This service is available 24 hours a day, seven days a week and is operated by an independent third-party provider. An operator or online web form documents your concern and forwards it to the appropriate ONEOK resource. You may report anonymously or identify yourself to help us review your concern.

ONEOK takes every report seriously, even if you don't have all of the details. We investigate reports discreetly, objectively and promptly, disclosing information only to those who need to know, and we expect anyone involved to cooperate fully and honestly in the investigation process.

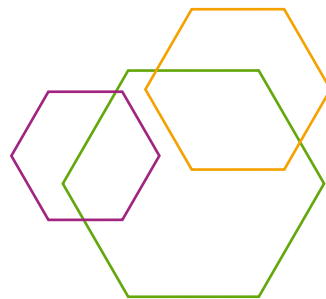
### Could I Face Retaliation?

In a word, no. We understand speaking up isn't always easy. It takes courage. We won't tolerate retaliation of any kind against anyone who reports in good faith or helps with an investigation. Retaliation goes against our Core Values and our Business Partner Code and won't be permitted at ONEOK.



# SHARE OUR COMMITMENT

We rely on every partner who works on ONEOK's behalf to understand and uphold our high standards of conduct and operate with honesty and integrity. This section of the Business Partner Code gives you an overview of those standards and what we expect from you as our partner.





## Diversity and Inclusion

Diversity is a source of strength for ONEOK and our business partners. We make all employment decisions objectively, including hiring, promoting and compensation and expect the same from our business partners. Follow employment laws and base employment decisions on job requirements and qualifications, never on protected traits such as:

- › Race.
- › Color.
- › Religion.
- › Sex.
- › Gender expression or identity.
- › Sexual orientation.
- › National origin.
- › Age.
- › Disability.
- › Genetic information.
- › Veteran status.
- › Any other category protected by applicable law.

Give every person equal access to resources and opportunities and let us know about acts of discrimination or improper treatment.

## Respect in the Workplace

We are committed to maintaining a workplace that's welcoming and rewarding. Whether employees work for ONEOK or one of our business partners, they should never be subjected to harassment or disrespect. As our business partner, you have a duty to keep this behavior out of your operations and supply chain. Ensure that your employees:

- › Learn to recognize harassment in all its forms (whether verbal, visual or physical), including sexual harassment.
- › Promote dignity and respect in every interaction.
- › Watch for and report signs of disrespect, harassment, bullying or abuse, no matter who is involved or where it happens.



## Health and Safety

The safety of our employees, customers, business partners and communities is paramount, and each of us plays a critical role. ONEOK expects our business partners to provide a safe, clean and healthy work environment for employees and comply with all applicable health and safety laws, regulations and policies. Make sure your employees:

- Know and follow ONEOK's safety policies and procedures without exception.
- Complete all required training and adopt safe daily work practices.
- Carefully follow physical security policies.
- Watch for and report unsafe conditions, including workplace hazards, property damage, threats, intimidation or the possession of weapons.

Be aware, ONEOK also prohibits the use, possession, sale or distribution of drugs or controlled substances. We also prohibit alcohol consumption on company property, while using company equipment or during working hours unless at a ONEOK-authorized event.

## Use of ONEOK's Name and Assets

ONEOK's name and reputation are among our most important assets and anyone who partners with us has a responsibility to protect them. That includes never using ONEOK's name or logo or disclosing a business relationship with our company without authorization. We require business partners to obtain written consent from ONEOK before issuing press releases or other publicity related to our partnership. We also prohibit business partners from speaking to the press on behalf of our company. When it comes to all other ONEOK assets, including our facilities and equipment, we expect you to use them only for legitimate work – never for any personal, illegal or inappropriate purpose.

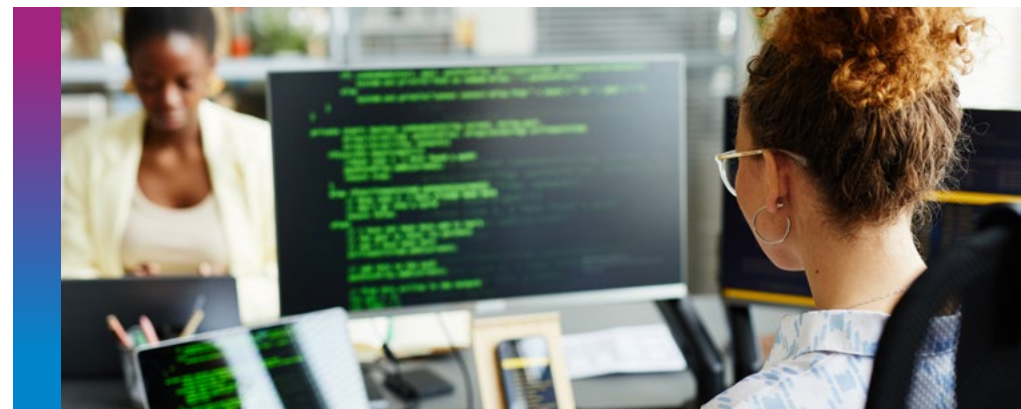
## Confidentiality and Data Privacy

Sensitive, confidential information, intellectual property and personal data are essential to our business and our ability to innovate and compete. Whether this information belongs to ONEOK, our employees, customers or other entities, our business partners have a responsibility to treat it with respect and protect it from loss, disclosure and misuse. Make sure your employees handle confidential information, ideas, technical data and innovations with care by:

- Following the law and Information Technology policies to keep confidential information secure.
- Using this information only for legitimate business purposes.
- Only sharing it with those with a business need to know, never discussing it in public places or on social media or accessing it on unsecured networks.

**When it comes to personal data, no matter who owns it, have employees protect it by:**

- Collecting the minimum amount of personal information needed to do your work.
- Following applicable data protection laws and security measures.
- Immediately reporting any data breaches or suspected data breaches.



## Conflicts of Interest

Every decision we and our business partners make for ONEOK must be grounded in objectivity and honesty. That means never allowing personal interests to interfere with our business decisions or influence them in any way – possible conflicts of interest. Situations that create (or appear to create) conflicts can harm ONEOK, our relationships and our reputation, so recognize them and avoid them. Conflicts often arise with employment or business opportunities, inappropriate offers of gifts or entertainment, financial interests or investments and outside advisory positions. If you believe you may be facing a conflict of interest, disclose it immediately to your ONEOK contact for guidance.

## Business Partner Relationships

ONEOK is committed to partnering with third parties who share our commitment to integrity and excellence, and we expect you to do likewise. Whether you're working with consultants, agents, suppliers or other third parties, business partners should conduct their business with integrity and follow all laws that apply. To ensure ethical business partnerships, make sure your organization:

- Selects business partners based on objective criteria such as quality, price, service, delivery record and the third party's reputation for operating ethically and lawfully.
- Monitors business partner performance to ensure the fulfillment of obligations and high standards of business conduct. That includes avoidance of conflicts of interest, compliance with anti-bribery and anti-corruption laws and the protection of confidential information.

## Fair Competition

At ONEOK, we believe in healthy and fair competition. In other words, we play by the rules, carefully following the antitrust and competition laws wherever we operate. Our business partners must hold themselves to these same standards and avoid conduct that might appear to be anti-competitive. That includes never making an agreement with a competitor to restrict trade, limit production or keep others from competing. It also includes never using unfair practices such as manipulation, abuse of confidential information, or falsification or concealment of facts to take advantage of someone.



## Anti-Bribery and Anti-Corruption

We're proud of ONEOK and confident in the quality of our work – we never resort to acts of bribery, corruption or any other unethical or illegal practices to succeed. Everyone at ONEOK, including our business partners, must be committed to winning business fairly and complying with anti-bribery and anti-corruption laws wherever we do business. To keep bribery and corruption out of our operations, make sure your employees (and those working on your behalf) never offer or accept anything of value to influence a business decision or gain a business advantage. That includes offers of gifts or entertainment that violate our policies or yours. Follow the law and maintain accurate records to ensure transparency.

## Insider Trading

We believe in doing what's right, including in the way we invest. Having access to material, nonpublic (or "inside") information could unfairly influence someone's investment decisions. Working with ONEOK may give our business partners access to inside information about our company or other companies with which we do business. We expect you to recognize inside information and keep it secure. That means never trading on inside information or sharing it with others so they may trade (an act known as "tipping"). These acts can disrupt financial markets and violate the law.

## International Trade

ONEOK recognizes that doing business globally is both a privilege and a challenge. We and everyone who partners with us must follow trade compliance laws. Those rules involve export controls, economic sanctions, import laws, regulations and more. If you help ONEOK conduct business across borders or with foreign nationals in the United States or abroad:

- Know and comply with all the requirements that apply in the countries where you do business.
- Make sure that your customers, suppliers and transactions comply with these requirements.
- Classify imports and exports completely and accurately and obtain all necessary licenses and approvals.

## Accurate Records

When ONEOK's records are accurate, we're better able to meet our obligations, make good business decisions and plan for the future. As an extension of our company, our business partners have a responsibility to enhance those records and, at the same time, our financial and operational integrity. We rely on you and your employees to help prevent fraud and misconduct by maintaining complete and accurate records, following all internal controls, ensuring proper disclosures and complying with applicable laws, regulations and accounting practices. Be ethical in the contracting process, cooperate fully with audits and investigations, and if you see suspicious financial activity or irregularities, report it immediately.

## Government Interactions

Because ONEOK works in a highly regulated industry, we make a special commitment to upholding the standards and rules that apply to us. We rely on our business partners to help us by demonstrating integrity in every interaction and disclosure to government officials. Ensure that your employees and third parties know and follow the regulatory and contractual requirements that apply to our government interactions. Treat officials with respect and never offer them anything of value. Protect confidential government information and be accurate and transparent in all statements and disclosures.



## Human Rights

Our work is all about helping people and communities thrive. That's why we take our responsibility seriously to protect the safety and dignity of everyone who contributes to our business. Our business partners must share ONEOK's commitment by following laws designed to uphold human rights in the countries where they do business. We also trust them to watch for and speak up immediately about human rights abuses such as forced or child labor, modern slavery and human trafficking. Make sure anyone who contributes to our operations or supply chain (or yours) is paid a legal wage, has a safe place to work and is free to choose whether or not to work.

## Environmental Protection and Sustainability

At ONEOK, we recognize the impact our business can have on our environment and are committed to operating in an environmentally responsible manner. That's why our business partners must comply carefully with all applicable environmental laws, regulations, guidelines and industry codes, obtain all required environmental permits and licenses and follow all applicable operational and reporting requirements. We rely on you in your daily operations, and throughout your supply chain, to help ONEOK:

- Reduce greenhouse gas emissions.
- Safely handle, store and dispose of hazardous materials.
- Recycle material and reduce overall waste.
- Source materials responsibly, seeking sustainable materials where possible.
- Identify and immediately report environmental hazards.

## Business Continuity

An important part of our work is being prepared for anything, including service disruptions. We look to our business partners to help us prepare by creating and implementing an emergency response and disaster recovery plan designed to notify and potentially evacuate employees, protect data and intellectual property and ensure continuity of services they provide to ONEOK. Make sure your plans account for weather emergencies, natural disasters, infectious diseases, labor and other resource challenges and system, power, telecommunications or facilities outages. Test continuity plans regularly.



## Be the ONE

Thank you for taking the time to read and commit to our Business Partner Code.

At ONEOK, we believe there's only ONE way to work – with integrity and with business partners who share our vision and commitment to doing what's right. We appreciate that you're among those valued partners. Remember, your actions and your relationship with ONEOK matters a great deal to our company and our customers. We look forward to a long and successful future together.

If you have questions about this Business Partner Code or have concerns of any kind, please reach out to your usual ONEOK business contact, [ONEOK Compliance and Ethics](#) or the [ONEOK Hotline](#).

### BE THE ONE WHO ...

- > Lives our Core Values.
- > Welcomes and values every individual.
- > Promotes quality, safety and sustainability.
- > Maintains accurate records.
- > Protects information and assets.
- > Avoids conflicts of interest and inappropriate offers.
- > Competes fairly and represents ONEOK with integrity.

