

Anti-Bribery and Corruption Supplier Policy

Purpose, scope and responsibility

This Anti-Bribery and Corruption Policy (the “ABC Policy”) establishes the principles, conduct and ethical standards expected and required by The W.W. Williams Company, LLC (“Williams”) of all its Suppliers and third parties with which it contracts and does business (the “Suppliers”). All Suppliers warrant and represent that they comply with the U.S. Foreign Corrupt Practices Act (“FCPA”) and all other applicable anti-bribery and corruption laws enacted in any country in which it is incorporated or engages in business (collectively referred to as “ABC Laws”), and that the actions, relationships, or services provided by Supplier do not violate, will not violate, and will not place Williams in violation of any ABC Laws applicable to the Supplier.

All Suppliers will adhere to this ABC Policy as follows, and certifies that the Supplier:

- ▶ Has not performed any agreement or participated in any business relationship activities, including any services provided by any of its associates or employee family members, that have or will violate the ABC Laws;
- ▶ Has not, directly or indirectly, authorized, offered, promised, paid, given, or otherwise set out to provide any inappropriate inducement to a third-party, including any government officials as defined in any applicable ABC Laws, of anything of value, financial or otherwise, that could be used by or for the benefit of any third-party in order to influence any act or decision of such third-party in their official capacity, in violation of any ABC Laws;
- ▶ Has not been engaged in any conduct which would constitute an offense under an ABC Law (whether or not the Supplier is subject to the ABC Law);
- ▶ Has not, nor have any Supplier executives, officers, or affiliates, been convicted, charged or investigated of a criminal offense;
- ▶ Has not, and currently is not, the subject of any investigation or prosecution for breach of any ABC Laws;
- ▶ Has not done anything, and will not do anything, that could put Williams in breach of any ABC Laws;
- ▶ Has not breached of any duty of confidentiality owed to any third party in performing any obligation under this ABC Policy;
- ▶ Has not, directly or indirectly, facilitated any offense of tax evasion; and
- ▶ Has not, and will not, provide any facilitation or “grease” payments to any government officials.

Indemnification

Supplier shall indemnify and hold harmless Williams, its shareholders, parent company, employees, agents, representatives, officers and directors from and against all suits, actions, fines, demands, legal or administrative proceedings, damages, costs, expenses, liabilities and losses (including but not limited to any direct, indirect or consequential losses, loss of profit, and all interest, penalties, legal and other professional costs and expenses) asserted against, suffered or incurred by any such party and which arise out of, or directly or indirectly relate to, any actual or alleged breach or failure of the Supplier to comply with this ABC Policy or any applicable ABC Laws.

Reporting violations

Suppliers should seek clarification with their legal counsel on any questions or concerns regarding activities that may qualify as a violation of this ABC Policy or the interpretation of any ABC Law. Any violation of this ABC Policy or ABC Laws by Suppliers may be reported to Williams through its Compliance Hotline:

- ▶ **Website Reporting:** www.lighthouse-services.com/wwwilliams
- ▶ **Toll-Free Telephone Reporting:**
 - English speaking USA: 833-900-0070
 - Spanish speaking USA: 800-216-1288
 - Spanish speaking Mexico: 01-800-681-5340
- ▶ **E-mail Reporting:** reports@lighthouse-services.com (must include company name with report)