

2017 Williams Way to Wellness Incentive Program Rules For US Participants

Program Rules:

Incentive: Participation in the 2017 Williams Way to Wellness Incentive Program is completely voluntary. Employees who choose to participate in the program will receive up to a \$300 annual medical premium discount if they complete the required criteria described below by the applicable stated deadlines and are active medical plan participants for the 2018 plan year. Employees will receive up to an additional \$300 annual medical premium discount if their eligible spouse or domestic partner chooses to participate in the program and completes the required criteria described below by the applicable stated deadlines and are active medical plan dependents for the 2018 plan year. In addition, eligible employees will be eligible to participate in Amazon gift card drawings.

Employees who qualify for the incentive will see the incentive reflected during Annual Enrollment as a wellness credit and on each applicable paystub. The premium discount for both employee participation and spouse or domestic partner participation will be credited to the associated employee over 24 paychecks. No lump sum payments or credit balances will be issued. With respect to the Amazon gift card drawings, the value of the gift cards may be subject to certain taxes and withholding requirements and will be administered in US dollars. In the discretion of the company, the company may pay certain of these taxes on behalf of the employee. In order to receive the incentive payout, you must be an eligible employee, as described below, or the spouse or domestic partner of an eligible employee on the date of distribution.

Incentive for Dual Employee Households: Williams has many employees who are a couple and eligible either through marriage or domestic partnership to enroll in each other's medical plan as dependents. If both employees are eligible and meet the criteria set forth below, Williams will provide the incentive to each regardless of whether they enroll in the medical plan as an employee or as a spouse or domestic partner. Therefore, the incentive would be a \$600 discount if enrolled as employee + spouse/domestic partner, or employee + family; or \$300 discount if enrolled as employee only, or employee + children. If an employee is covered under the Williams medical plan as a child of another employee, no incentive will be received with respect to such child even though he is an employee of Williams.

Required Criteria for Eligibility of Incentive: Employees, spouses or domestic partners who meet the eligible employee, spouse or domestic partner definition may complete up to three levels to receive the medical premium discount in 2018. Employees may earn up to \$300 off 2018 medical plan premiums. Spouses and domestic partners may earn up to \$300 off 2018 medical plan premiums. Completed and submitted health screenings and Well-Being Assessments are required to earn all incentives. ***Employees and spouses or domestic partners are not required to complete the Well-Being Assessment or health***

screenings. However, if the employee, spouse or domestic partner chooses to do so, completion of the assessment and/or participation in the health screening will constitute written, voluntary authorization for the wellness program to collect the individual's medical information.

IMPORTANT NOTE ABOUT ACTIVITIES AND CHALLENGES: There are two types of activities included in the Williams Way to Wellness program – self-tracked and verified. For self-tracked activities, you must join the activity using the “Join now” button, complete the listed requirements, and track completion – all within the specific challenge tile. For verified events, the requirements will be outlined in the specific challenge tile, however, participation will be verified automatically through the site or by a third-party upon completion of the requirements (for example, points will be awarded automatically once screening results are loaded to the Limeade site). Be aware, there may be a delay in awarding points for verified activities after activity completion.

Activities and challenges include nutrition, stress, work-life balance, preventive screenings, safety, social/family time, physical activity, etc. Point values, required effort, and tracking vary for each activity. You must join the applicable activity or challenge and complete required tracking to earn points. Failure to enroll or track progress will result in points not being awarded. You must enroll and track progress online on the Williams Wellness Program portal found via the link.

Level	Required Activity	Time Period for Completion	Incentive
Level 1	<ul style="list-style-type: none"> • Complete a health screening that collects routine medical information, such as weight, blood pressure and cholesterol, at an onsite health screening event or send an original physician form completed* by an appropriate medical professional to Limeade c/o Aduro. Participants will also receive 500 points toward other incentive levels. • Complete a Well-Being Assessment questionnaire that collects basic information regarding your wellbeing such as nutrition, physical activity, social support, etc. by logging onto the Limeade website via the Williams Wellness Program link at www.williamswellnessprogram.com. Participants will also receive 500 points toward other incentive levels. <p><i>Completion of the assessment and/or participation in the health screening will constitute written, voluntary authorization by the participating individual for the wellness program to collect this medical information.</i></p> <p>Note: Your results for both the health screening and well-being assessment will be reported to you and you will receive follow-up information, advice or suggested action regarding your results.</p>	1/10/2017 – 9/17/2017	\$150 off 2018 medical premiums
Level 2	Accumulate 2,000 to 2,999 points by participating in wellness activities and	1/10/2017 – 9/17/2017	\$75 off 2018 medical

Level	Required Activity	Time Period for Completion	Incentive
	challenges on the Williams Wellness Program portal.		premiums
Level 3	Accumulate 3,000 to 3,999 points by participating in wellness activities and challenges on the Williams Wellness Program portal.	1/10/2017 – 9/17/2017	\$75 off 2018 medical premiums
Level 4	Accumulate 4,000 or more points by participating wellness activities and challenges on the Williams Wellness Program portal.	1/10/2017 – 12/17/2017	Entry into drawing for Amazon gift card
* The physician form must be appropriately completed including the signature of the participant and the physician.			

Accommodations: Rewards for participating in a wellness program are available to all eligible employees and their spouses or domestic partners who are enrolled in the Williams Medical Plan. If you think you might be unable to meet a standard for a reward under this program, you might qualify for an opportunity to earn the same incentive by different means. Contact williamsway2answers@williams.com and we will work with you (and, if you wish, with your doctor) to find a different means for you to qualify for the incentive. You must make the request within a reasonable period of time prior to the September 17 deadline to allow for the alternative standard. This program complies with the Health Insurance Portability and Accountability Act and the information you provide will only be used by the administrators for purposes of the program and the medical plan. Health information that is provided in connection with the wellness program will not be provided to Williams or your supervisors or managers and may never be used to make decisions regarding your employment. Williams may only receive aggregated de-identified health information from the wellness program in order to assist it in administering the wellness program and its group medical plans. Williams reserves the right to amend or terminate the wellness program at any time.

Program Timeframe and Deadline: The program period will run from January 10, 2017 through December 17, 2017. Level one requirements (health screening and Well-Being Assessment) must be completed and received by Limeade as instructed by September 17, 2017 to be considered eligible for the premium discount. Levels two and three must be completed as instructed and received by Limeade by September 17, 2017 to be considered eligible for the additional premium discounts.

Eligible Employee Definition: All active employees and certain employees on a leave of absence, as described in the chart below, are eligible to participate in the program. To be eligible for the premium discount incentive, you must be an eligible employee, enrolled in the Williams medical plan and have completed the requirements by stated deadlines. To be eligible for the drawings, you must be an eligible employee, described in the chart below, and have completed the requirements by stated deadlines. You are not required to be enrolled in the Williams medical plan to be eligible for drawings. Specific eligibility for employees is discussed in more detail in the table below.

Eligible Spouse and Domestic Partner Definition: To be eligible for the program and incentives, you must be a current spouse or domestic partner of an eligible employee, as described in the chart below, be enrolled in the Williams medical plan and have completed the requirements by the stated deadlines. Survivor spouses and domestic partners are not eligible for the program or program incentives. Specific eligibility for spouses and domestic partners is discussed in more detail below.

New Hires: Employees hired after August 31, 2017 will not be able to participate in the program to receive the premium discount. They will however, be eligible to participate in the Amazon gift card drawings if required activities including the biometric screening, Well-Being Assessment and 4,000 points are completed by December 17, 2017. Employees hired after September 30, 2017, will not be able to participate in the 2017 program. The aforementioned timeline and requirements for new hires also applies to spouses or domestic partners covered as dependents on the new hire employee's medical coverage.

Specific Eligibility Situations:

	Eligibility to Participate in Program	Eligibility to Receive Incentive Credits
Individuals on LTD and Workers Compensation Leave (extending beyond approximately 26 weeks)	No	No
Individuals on FMLA Leave (paid and unpaid)	Yes	Yes
Individuals on STD and Workers Compensation Leave less than approximately 26 weeks	Yes	Yes
Individuals on Military Leave being paid by Williams and receiving coverage on the same terms as an active employee	Yes	Yes
Individuals on Military Leave not being paid by Williams and not receiving coverage on the same terms as an active employee	No	No
Individuals on Personal, Educational or other Unpaid Leave	No	No
Retirees	No	No
Individuals on COBRA	No	No
Interns	No	No
Temporary Employees	No	No
Independent Contractor	No	No
Survivor Spouse or Domestic Partner	No	No

Termination of Incentive: For all participants, including both employees and spouses/domestic partners, any incentive or remaining balance of incentive will be forfeited on the date an eligible employee or spouse/domestic partner ceases to meet the definition of eligible employee or spouse/domestic partner, as applicable. The incentive is not available for those who are covered under COBRA or a retiree medical plan offered by Williams. If the participant becomes eligible again during the plan year, they may resume participation and receive the incentive credit prospectively.

Disclaimer: This program is void where prohibited by applicable law. While every effort has been made to ensure the information contained in this communication is correct, if there is any omission or misstatement, the applicable legal plan document(s), policy(ies) or program(s) will control. The eligibility for any benefit will be governed by the terms of the applicable benefit plan, program or policy. The plan administrator (and its designee or the insurer or claims administrator, as applicable) has the power, including, without limitation, discretionary power to make all determinations that the plan(s) require for its administration, and to construe and interpret the plan(s) for purposes of determining eligibility and benefits. Williams or the applicable plan entity/committee as detailed in the applicable benefit plan, as applicable, reserves the right to amend, modify or terminate any plan(s) or benefit policies or programs in whole or in part at any time. The employee benefit policies, programs and plans are not individually or collectively an employment contract and do not give any employee any right to be retained in the services of the company. The information in this communication is not medical advice and it is not intended to replace the advice of your physician. The information is intended to help you take greater responsibility for your own health, to work with your personal physician, and to make better health and wellness decisions.

Claim and Appeal Information: If a participant is dissatisfied with Limeade’s determination with respect to his or her eligibility to participate or satisfaction of the requirements to receive the wellness incentive, the participant may submit a written claim to the appropriate Claims Administrator at the following address:

Health and Group Benefits Delegate
of the Administrative Committee
PO Box 2400, MD 42
Tulsa, OK 74102
Fax # 918-573-9046

Keep in mind that all claims regarding Limeade’s determination with respect to eligibility or satisfaction of Program requirements must be submitted within one year of the end of the Program timeframe (premium discount claims by 9/17/17 and gift card claims by 12/17/17).

If a participant is dissatisfied with an adverse benefit determination (denial) of the claim, the participant may submit a written appeal to the Plan Administrator at the following address:

The Administrative Committee
PO Box 2400, MD 42
Tulsa, OK 74102
Fax # 918-573-9046

All appeal requests must be made within 180 days of the date you receive notice of the adverse benefit determination. Any review will take into account all comments, documents, records and other information you submit relating to the appeal, even if it was not submitted or considered in the initial claims determination. Your written appeal communication should include:

- The participant’s legal name;
- A detailed description of the events surrounding your claim situation including, but not limited to, the facts of the situation, any corrective actions taken, your rationale for bringing the claim, and any other facts or circumstances to justify your claim; and
- Any documentation or other written information to support your request.

For full information on the appeal process, please refer to the current Summary Plan Description (SPD).

Additional Information:

Williams Wellness Program Website: www.williamswellnessprogram.com and click on the blue “Williams Wellness Program” button.

[Wellness Notice and Authorization](#)

Questions? Contact Williams Way to Answers via email: williamsway2answers@williams.com