



2018 Williams Way to Wellness

The 2018 Williams Way to Wellness Program (the "Program" or the "Wellness Program") is a voluntary wellness program available to all active employees and certain employees on a leave of absence¹ ("**Eligible Employees**") and their spouses or domestic partners. A detailed discussion of the terms and conditions of the Program is contained in the 2018 Williams Way to Wellness Incentive Program Rules For U.S. Participants (the "**Wellness Program Rules**") available at www.williamswellnessprogram.com.

Voluntary Authorization to Collect Medical Information. If you and/or your spouse or domestic partner choose to participate in the Wellness Program you will be asked to complete a Well-Being Assessment questionnaire that asks a series of questions about your health-related activities and behaviors and whether you have or had certain medical conditions (e.g., cancer, diabetes, or heart disease). You will also be asked to complete a health screening. ***You are not required to complete the Well-Being Assessment questionnaire or health screening. However, if you and/or your spouse or domestic partner choose 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 this medical information.***

Protections from Disclosure of Medical Information. The Wellness Program is required by law (the Health Insurance Portability and Accountability Act or HIPAA) to maintain the privacy and security of your personally identifiable health information ("**PHI**"). Your PHI that is provided in connection with the Wellness Program Well-Being Assessment or health screening 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 Well-Being Assessment or health screening in order to assist it in administering the Wellness Program and its group medical plans.

Your PHI will not be sold, exchanged, transferred, or otherwise disclosed except to the extent permitted by law to carry out specific activities related to the Wellness Program, and you will not be asked or required to waive the confidentiality of your PHI as a condition of participating in the Wellness Program or receiving an incentive. ***All individuals involved with the operation of the Wellness Program will abide by these restrictions.***

You may not be discriminated against in employment because of the medical information you provide as part of participating in the Wellness Program, nor may you be subjected to retaliation if you choose not to participate.

If you have questions or concerns regarding this notice, or about protections against discrimination and retaliation, please review the Wellness Program Rules or contact Williams Way to Wellness at williamswaytowellness@williams.com.

¹These include employees who are on FMLA leave, STD or Workers Compensation Leave for less than 26 weeks or Military Leave and receiving pay from Williams.