



Code of Business Conduct & Ethics

Version adopted 12/3/09

MESSAGE FROM THE CEO

It is not enough to achieve the right results. They must be achieved the right way.

Of course, business conduct issues are not always black and white. That is where this Code of Business Conduct and Ethics can help.

The Code applies to, and was designed, as a guide for all directors, officers and employees of the Partnership Group and to help them put the Partnership's Core Values and Beliefs into practice when performing their duties on behalf of the Partnership Group. While no Code can be totally comprehensive, it does provide guidance for some of the more common issues we might face.

This Code also identifies other resources available to all of us to help resolve ethical issues at work. We understand there are times when we all need help deciding the right thing to do, and it is important we know where we can turn for assistance in resolving such issues.

Corporate governance is taken very seriously by the Partnership Group, and we are all responsible for reading, understanding and adhering to the business conduct standards outlined in this Code.

Thank you for your continued commitment to the Partnership's Core Values and Beliefs and doing business the right way. The Partnership's future success depends on it.

Sincerely,

Steve Malcolm
Chairman of the Board and Chief Executive Officer
Williams Pipeline GP LLC

THE PARTNERSHIP'S CORE VALUES & BELIEFS

Integrity

Integrity must not be compromised. Honest relationships and trust are essential for long-term business success. We deal fairly in all our business relations.

Investors

We are committed to providing our investors an attractive return over the long term.

Customers

Customers are the essence of our business. Customers are all parties with whom we deal. We work to satisfy our customers' requirements and anticipate their expectations. To succeed, we must work with our customers to help make them winners, too.

Employees

People are the Partnership Group's most valuable resource. Employees possess immense powers of innovation, imagination, skill and a desire to accomplish something of significance. Working as a team enables all of us to realize our full potential.

Communities

We recognize and enthusiastically accept our responsibility to the communities we serve, through acting as a good neighbor and through involvement and support for community activities. We are committed to protecting the public, the environment and our natural resources by operating in a safe, reliable manner.

Entrepreneurial Spirit

We maintain a corporate culture that values originality, invention and creativity, and that nurtures these qualities through openness and reverence for the entrepreneurial spirit.

Tolerance for Risk

The Partnership Group's willingness to take risks in deploying new technology and investing in large capital projects is central to its culture and its success.

Efficiency

Efficiency means the difference between success and failure. We will relentlessly pursue a more efficient way to do everything we undertake.

Autonomy of Operating Units

The autonomy of operating units is important to promote focus, fast decision making and ultimately commitment, which is essential for success. At the same time, cooperation must exist so that operating units work efficiently together and share ideas. Autonomy and entrepreneurial spirit go hand in hand.

Change

We welcome change for the opportunities it offers.

GUIDANCE FOR RESOLVING AND REPORTING CONCERNS

Quick Ethics Check

If you are in doubt when faced with an ethical dilemma at work, ask yourself:

- Is it legal? If legal, is it the right thing to do?
- Is it consistent with the Partnership's policies, standards, and Core Values & Beliefs?
- What would my family think about it?
- How would it look in a newspaper article?

If you are still not sure what to do, seek guidance from one of the reporting channels listed in the next section.

Where to Seek Guidance

This Code is a guide for helping employees and directors conduct their business in a manner consistent with the Partnership's Core Values and Beliefs. Because our business can be very complex at times, the Code is not meant to provide all the answers. It also doesn't form the basis for a contract or claim of any kind. Instead, the Code is intended to be a practical guide to some of the more common situations that many of us may face from time to time.

Just like the Code, none of us is expected to have all the answers. When we have questions or concerns about business conduct, the Partnership Group expects us to seek the guidance we need from the following reporting channels. Personnel in these reporting channels are sensitive to requests for confidential and anonymous treatment. However, reports involving a threat to life and property, illegal activities or legal action against the Partnership Group are examples of when action required may not allow for complete confidentiality or anonymity.

- Supervisor – It is often most effective to report our concerns to our immediate supervisor. Supervisors are directly responsible for providing their employees with the resources necessary to resolve problems or concerns.
- Next Level(s) of Management – In the event an issue is not handled to our satisfaction or we are not comfortable discussing it with our immediate supervisor, we can take the matter to the next level(s) of management. Another effective channel for problem solving is Williams Human Resources, who has a primary role to support the employee. In addition, the Williams' Legal Department is there to assist us with legal issues.

- Functional Vice President – If these previous steps do not resolve the issue, we can make arrangements to review the situation with our functional vice president.
- Business Ethics Resource Center – If the above channels do not provide a satisfactory resolution, we may also contact the Williams Business Ethics Resource Center (see contact information at the end of this Code). All concerns reported to the Business Ethics Resource Center will be evaluated to determine the appropriate course of action to be taken. **If we want to report anonymously, we may call the Action Line (1-800-324-3606).**

In addition, the Audit Committee of the General Partner has established procedures for the receipt, retention and treatment of complaints regarding accounting, internal accounting controls or auditing matters. If we have unresolved concerns regarding questionable accounting or auditing matters, we should promptly contact one of the reporting channels listed above. These reporting channels should immediately communicate those concerns to the Williams Business Ethics Resource Center, which is responsible for reporting such information to the General Partner's Audit Committee.

Reporting Suspected Violations

We all have a responsibility for promptly reporting unauthorized or unlawful activity or violations of the Code. The Partnership Group understands employees may be reluctant to report violations if they believe the reporting employee will be subjected to retaliation. **Therefore, it is important for us to understand that the Partnership Group will not tolerate retaliation against any employee who reports a suspected violation in good faith.**

Investigations and Corrective Actions

All reports of suspected violations of laws, rules, regulations or the Code will be evaluated by a member of the Partnership Group or Williams. An investigation will be conducted if the evaluation points to a potential problem. If the results of an investigation indicate that corrective action needs to be taken, a member of the Partnership Group or Williams will determine the appropriate steps, including employee discipline, dismissal and possible legal proceedings. Such actions will also be brought against individuals who have willfully failed to report known violations.

Waivers

Any waiver of any of the provisions of this Code for any executive officer or director may be made only by the Board of Directors of the General Partner. Any such waiver must be promptly disclosed to unitholders in accordance with the applicable rules of the New York Stock Exchange as well as in accordance with the rules and regulations of the Securities and Exchange Commission.

OUR WORK ENVIRONMENT

A good working environment helps support many of the Partnership's Core Values and Beliefs. It helps protect our most valuable resource, the employees, and allows us all to reach our greatest potential. It is also consistent with our recognized responsibility to serve our communities by helping to protect the public and the environment. Our work environment includes the work site, partnership events, and anywhere employees may serve as representatives of the Partnership Group.

A positive work environment helps promote a willingness among employees to embrace change, take risks, and work together as efficiently as possible. It also creates a culture that nurtures our entrepreneurial spirits, and supports us when it is more effective to be autonomous.

We all are responsible for promoting the most productive and positive working environment possible. Our behaviors can affect our work environment, as well as the Partnership's reputation in the community. We expect that employees will maintain a high degree of integrity and honesty, and are committed to professional behavior at work and anywhere they might be acting as representatives of the Partnership Group. By doing so, we support the Partnership's Core Values and Beliefs and contribute to the Partnership's future success.

Equal Opportunity, Affirmative Action and Diversity

The Partnership Group has a strong commitment to equal opportunity, affirmative action and diversity in the work force. The Partnership Group believes in treating people with dignity and providing equal employment and advancement opportunities based on merit, experience and other work-related criteria.

The Partnership Group values the unique contributions that every employee brings to her or his role and consider the variety of perspectives and backgrounds that exist as a competitive advantage in the marketplace. The Partnership Group is committed to treating all employees fairly, without regard to any characteristics that have no bearing on job performance.

Harassment/Violence

Respecting the rights of others in the workplace is a primary focus of the Partnership Group. There are certain behaviors that are not acceptable under any circumstances – such as harassment and/or violence of any kind. Examples include any unwelcome behavior such as advances, inappropriate jokes, intimidation, offensive language, physical contact, threats or other inappropriate behavior that creates a hostile working environment for other employees. This also covers such acts that occur off partnership premises involving someone who is acting in the capacity of a representative of the Partnership Group.

Health, Safety and the Environment

The Partnership Group is committed to the goal of healthy, safe and environmentally sound business practices and operations. We are responsible for using all reasonable efforts to operate in a manner that preserves the environment and protects the health and safety of employees and others. We are also responsible for complying with all applicable laws and regulations relating to the protection of the environment and the maintenance of a healthy and safe workplace.

Alcohol and Substance Abuse

Our work benefits from our clear thinking and ability to react quickly. It is important for us to understand that the Partnership Group will not tolerate unauthorized use, possession and distribution, or being under the influence of alcohol or illegal drugs in the workplace. A voluntary Employee Assistance Program (EAP) is available through Williams for those seeking to overcome drug or alcohol related problems.

Williams VP-level or General Partner VP-level approval is required before serving alcohol on partnership premises or at a partnership-sponsored event. If alcohol is served at a partnership-sponsored event or anywhere an employee is representing the Partnership Group, the employee is expected to behave respectfully and responsibly for their safety and the safety of others.

Employee Privacy

The Partnership Group respects the privacy of others. The Partnership Group maintains employee privacy through the careful handling of employee information at all times. We, as employees, have the right to expect that our personnel records will only be accessed by those with a legitimate reason for doing so. In turn, we must understand the Partnership Group's right to access all company property, communications, records and information created in the business setting.

Q&A

What if my supervisor starts to play favorites with job assignments and overtime, and I begin to feel discriminated against? What should I do?

You should tell your supervisor in clear and specific terms that you feel you have not been treated fairly in terms of job assignments and overtime. If you feel your supervisor has not responded to your concerns in a fair manner, take advantage of the other reporting channels available to you and identified above under the caption "Guidance for Resolving and Reporting Concerns."

If I had a manager that kept asking me out socially after work, even though I had no interest and had continually refused the invitations, what should I do?

Tell him or her no. You should immediately report the situation, most likely to your manager's boss or Williams Human Resources.

If I receive a call from another company requesting a reference check on a former employee, how should I handle the call?

You should not provide any information, but should politely refer the caller to Williams Human Resources. By establishing Williams Human Resources as a clearinghouse for all reference requests, we can ensure that the information we release is accurate, authorized, and representative of the Partnership's position.

COMPLIANCE WITH ALL LAWS

The Partnership Group believes an honest and trusting relationship with all our stakeholders (investors, customers, employees and communities) is essential to our long-term business success. This belief drives our commitment to be a good corporate citizen and to comply with all applicable laws, rules and regulations.

We must understand the laws affecting our business activities and be responsible for compliance. Complying with both the spirit and letter of the law best serves the interest of the Partnership and its stakeholders.

The following is a brief listing of some of the major laws that can impact our business. Because legal issues can be very complex, if in doubt, we are encouraged to seek guidance from our management and legal counsel.

Antitrust

We believe that fair competition and a free enterprise system serves the best interest of the Partnership and its stakeholders. The antitrust laws were enacted to help preserve the free enterprise system by promoting competition. These laws prohibit business practices that result in unreasonable restraints of trade or discriminatory trade practices. The following are examples of practices that may be illegal:

- creation of a monopoly or attempts to create a monopoly;
- agreements among competitors to fix prices, divide markets, allocate customers or limit the quality or production of products; and
- price discrimination and other predatory trade practices.

Trading on Insider Information

The Partnership Group recognizes the importance of strong and healthy securities markets. To ensure such markets, and to prevent the misappropriation of the Partnership Group's confidential information, the law forbids us from purchasing or selling securities if we have material information which has not been made public (inside information). Material information covers such topics as earnings, acquisitions or divestitures, new products or services, changes in strategy, etc.

The law applies equally to Partnership securities and the securities of others who are involved with the Partnership in what would be a significant transaction for those other entities. Thus, whenever the Partnership is negotiating an acquisition of an entity, employees should not trade in equity securities of the Partnership or the to-be-acquired entity. This includes "tipping" others about material, non-public information.

Public Disclosures

The Partnership Group is committed to complying with all public disclosure laws and regulations, including but not limited to the Securities Exchange Act of 1934 and the Sarbanes-Oxley Act of 2002. We must assure that all disclosures made in all periodic reports and documents filed with the Securities and Exchange Commission, and other public communications by or on behalf of the Partnership are fair, accurate, timely and understandable. This is an obligation of all employees involved in any aspect of the process of preparing and/or certifying to a public disclosure.

Political Contributions

It is important to recognize that we have corporate interests at stake at the federal and state levels, and there are times when it is in our best interests to make our combined voices heard by our elected representatives. Laws governing political contributions are complex and vary in each state and country. Employees and directors may not use the Partnership Group's funds or assets for contributions of any kind to any political party or committee in the United States or to any candidate for, or holder of, any office of any national, state or local government in the United States except in cases where such use of the Partnership Group's funds or assets with respect to certain non-federal political matters is clearly permitted by all applicable laws. In countries other than the United States, the Partnership's policy shall be determined in accordance with local law and practice, as well as U.S. law. The use of the Partnership's funds or assets for political purposes must be approved through the Williams Government Affairs Department which, among other things, will obtain Williams Legal Department confirmation that the proposed use is permissible under federal, state, or other applicable law.

In accordance with applicable laws and regulations, Williams has established a Political Action Committee (PAC). Employee participation in the Williams PAC is voluntary, and employees have a right not to participate without fear of retaliation.

Commercial Bribery

The Partnership Group considers one of its most valuable assets to be its reputation of integrity. We seek fair and honest business relationships with all our stakeholders and suppliers. To that end, the Partnership Group does not tolerate the offering or accepting of bribes, kickbacks or other payoffs designed to influence the recipient's judgment.

The following are examples of prohibited conduct:

- payment or receipt of money, gifts, loans or other favors that are designed, or may tend, to compromise our ability to make objective and fair business decisions;
- payment or receipt of kickbacks for obtaining business; and
- payment of bribes to government officials to obtain favorable treatment.

Fraudulent Conduct

The Partnership Group is committed to conducting its business dealings in an honest and non-fraudulent manner. We will not intentionally deceive to gain an advantage over or injure another party. All Partnership Group information provided to any person or entity must be free from deliberate misrepresentation. For example, when dealing with a business associate, we must not make representations we know are false or lack the proper authority.

Obstruction of Justice

The Partnership Group recognizes the importance and benefits of a properly functioning justice system. We must always conduct ourselves in a way that does not interfere with or obstruct the operation of any legal or governmental system. This includes:

- obeying and not hindering the activities supported by legal and governmental mandates;
- not tampering with or illegally influencing any person who is scheduled to appear as a witness in any legal or governmental proceeding; and
- retaining documents consistent with the Partnership Group's retention policies, and not destroying any records with the intent to impede or obstruct any governmental investigation

FERC Standards of Conduct

The Partnership Group is committed to treating every customer fairly and equitably, and is committed to compliance with the FERC regulations. The FERC Standards of Conduct expressly prohibits Williams' and the Partnership's interstate natural gas pipelines (Williams' pipelines) from giving marketing function employees, through a tariff provision or otherwise, undue preference over non-affiliate customers to ensure that transportation services are provided on a non-discriminatory basis. This prohibition includes the improper exchange of information between Williams' pipelines and its marketing function employees as to non-public transmission function information or non-affiliate shipper information.

Foreign Business Dealings

Those of us involved in global business must be aware of and comply with international laws, which are frequently complex and unique. One of the most significant laws in this area is the Foreign Corrupt Practices Act. This Act makes it illegal to get or keep business by making improper payments to foreign officials, political parties and governments. The Act also requires significant accounting practices to deter the creation of slush funds to finance illegal payments.

Occasionally, Williams has found that certain foreign government officials refuse to perform their ordinary duties without the payment of some small amount, even though they are not significant policy or decision-makers. In some situations, a delay in their performance may materially and adversely affect the regular operations. Under these conditions, and if allowed by law, officers of the General Partner are permitted to authorize “facilitating payments” in small amounts to these officials in order to protect the Partnership’s operations. Because the laws and interpretations of each foreign country are complex, legal counsel must be consulted before any payments are made.

Q&A

I will be attending a trade association meeting next month and I am curious about our chances for receiving a contract award. I would like to discuss this with other bidders who will be there. Is that all right?

No. You should not discuss bids, terms of contracts, or similar proprietary business information with employees of competing firms. This might give others an unfair advantage, and it might create an antitrust problem. Don’t initiate such conversations or respond to any outside inquiries.

My family and friends often ask me about the Partnership and whether they should buy common units. If I tell them what I know about our business prospects and suggest they buy the common units, would that be a problem?

Yes, The rules of “inside” information apply whether you buy or sell securities yourself or if you give the information to someone else. If another person buys or sells securities based on non-public information or “tips” provided by you, both of you could be held liable for violation of federal securities laws. In any case, you should at all times refuse to recommend that anyone buy or sell Partnership units or other securities. Besides this concern, employees should never discuss confidential business information with anyone who does not have a need to know it.

Is it permissible for a business representative to entertain a government decisionmaker by taking him or her on an extravagant outing in an effort to speed up a decision on a matter?

Generally the law prohibits any payment, whether direct or, as in this case, indirect, whose purpose is to influence a government employee's behavior. Williams, the Partnership, the business representative and the government decisionmaker could all be prosecuted for bribery, if the offer were made and accepted.

Several of my co-workers and I strongly support a certain political candidate. May we work together to support this candidate?

Of course. The Partnership Group encourages participation in the political process. However, you may not use the Partnership Group's funds, equipment or materials to support the candidate, claim to represent the Partnership Group's opinions or views of a candidate or issue, and you may not engage in political activities while you are on the job.

We will be attending a foreign trade show and have shipped our product displays from the United States. What if we experience unusual delays in getting our displays released by the customs officials of the foreign country? I'm told it is customary in this country to pay \$100 to speed up processing of the customs document. Would this be proper?

In some foreign cultures, it is customary and necessary to make payments called "facilitating payments." These payments are for expediting routine governmental actions such as obtaining a permit or visa. In some cases, these payments may be illegal or improper. Before making such a payment, consult first with the Williams Legal Department.

CONFLICTS OF INTEREST

The Partnership's Core Values and Beliefs represent a strong commitment to investors, customers, employees and communities. We always want to act in the best interest of these stakeholders. Therefore, we all are expected to avoid or disclose any activity that may interfere, or have the appearance of interfering, with our responsibilities to the Partnership and its stakeholders. Activities that cannot be avoided must be disclosed to the immediate supervisor. That supervisor is responsible for establishing and monitoring procedures that ensure the Partnership is not disadvantaged.

Although no list of potential conflicts of interest can be complete, the following examples highlight activities which could cause conflicts:

Personal Benefits

Officers, directors or employees, or a member of such person's family, should not receive improper personal benefits as a result of his or her position in the Partnership Group. Employees, officers and directors and their family members are prohibited from accepting any personal loans from the Partnership Group or allowing the Partnership Group to guarantee any of their personal obligations, except as may be permitted and accurately disclosed under applicable law.

Corporate Opportunities

We owe a duty to the Partnership to advance its legitimate interests when the opportunity to do so arises. We should not personally compete with the Partnership, take for ourselves opportunities that are discovered through the use of its property, information or position or use its property, information or our position to divert business opportunities away from the Partnership for our own personal gain.

Outside Employment

The success of the Partnership depends on our strong commitment to our job responsibilities. While we may be permitted to work outside of the Partnership Group, we must make sure that such employment does not prevent us from fulfilling our job responsibilities to the Partnership Group. We may not be employed by or perform services for a competitor, customer or supplier without prior supervisory approval.

Financial Interests

We are all encouraged to pursue a secure financial future for ourselves. At the same time, we want to always take care that our financial involvements do not

have a negative impact on our ability to make sound and objective business decisions.

In regard to ourselves or a close relative or associate, a direct or indirect financial interest in any enterprise which does business with, or is a competitor of, the Partnership Group (other than Williams) represents a potential conflict of interest and should be fully reported to our immediate supervisor. In addition, the Partnership Group prohibits the following:

- employee participation in directed share (sometimes known as friends and family) programs offered by other business entities that have or may develop commercial relationships with the Partnership Group; and
- compensation, either directly or indirectly by an external party, to employees who represent the Partnership Group on the advisory boards of key vendors or industry groups.

Gifts and Entertainment

The Partnership Group understands that business gifts and entertainment can help build strong relationships with our business partners. However, we must understand that the Partnership Group does not tolerate the offering or receiving of gifts and entertainment designed to influence the recipient's judgment. There is no substitute for good judgment in this situation and if we are concerned about any particular situation, we should err on the side of caution.

Relatives

Situations may arise where a relative (defined as one who is related to another by blood or marriage) is employed or has a financial stake in an entity that does business with the Partnership Group. Frequently, this is not a problem, but the potential for actual or perceived conflicts of interest may exist. Such situations include, but are not limited to, the following:

- a relative involved in a business seeking to provide goods and services to the Partnership;
- gifts or other benefits offered to a relative by any enterprise that does business with the Partnership; and
- a relative working for a competitor.

We all need to be cautious of situations that can result in our inability to make objective business decisions, or lead to the disclosure of competitive or confidential information.

Q&A

I am thinking about starting my own outside business to bring in some extra income. Would this be a conflict of interest?

An outside business activity does not necessarily put you in a conflict of interest situation. If your outside business activity did not compete with the Partnership, and your participation in this business was accomplished outside your normal work hours and did not adversely impact your ability to do your job, this would probably not be a conflict of interest. However, you should review the matter with your supervisor before starting the activity.

An officer of the General Partner is thinking about taking a potential customer to an exclusive resort. Would this be acceptable?

If the purpose of this activity is to help build a good working relationship with the potential customer, then it would be acceptable. However, the activity would be against Partnership policy if (1) it was offered in return for securing the potential customer's business or (2) it was an attempt by the officer to compromise the potential customer's ability to make objective and fair business decisions.

What are the guidelines if I have a relative that works for one of the Partnership's competitors?

There is nothing wrong with relatives (or other personal relations) working for competitors or suppliers. However, you should be doubly aware of any potential conflict of interest (for example, there should be no discussion or exchange of sensitive information). It would be a good idea to alert your supervisor, thereby evidencing your appreciation of the potential sensitivity of the situation.

PROTECTING PARTNERSHIP GROUP ASSETS

Taking care of Partnership Group assets is a critical part of our ability to be successful. We are all responsible for safeguarding the Partnership Group's resources entrusted to us. The wise use of these assets significantly benefits the Partnership and its stakeholders.

Use of Partnership Group Assets

How we use and care for Partnership Group assets can have a direct impact on our financial success. We are responsible for properly handling those assets that

are entrusted to us. In general, we may not take, loan, donate, sell, damage or use Partnership Group assets for non-business purposes unless specifically authorized. However, occasional personal use of certain Partnership Group equipment (i.e. personal telephone calls, facsimiles, e-mails, Internet access) is permissible if the frequency and cost of such use is not excessive and does not conflict with Partnership Group's business or policy.

Recording of Funds, Assets, Etc.

The proper management and recording of Partnership Group funds, assets, liabilities and business transactions is critical for supporting the Partnership's day-to-day operations. It allows the Partnership to maximize the benefits of all its available resources. Thus, we must maintain books and records, through adequate internal controls and procedures, which reflect actual transactions and conform to generally accepted accounting principles.

Confidential Information

Much of the information developed or held by the Partnership Group is confidential and must be protected from unauthorized disclosure. This information plays a key role in our business strategies. We are responsible for safeguarding such information in order to maintain our competitive advantage in the marketplace. Accordingly, employees, officers and directors must maintain the confidentiality of information entrusted to them by the Partnership Group or its customers, except when disclosure is authorized or legally mandated.

Confidential information includes all non-public information that might be of use to competitors, or harmful to the Partnership Group or its customers, if disclosed. A few examples of confidential information are financial data, employee records, customer records, marketing research, pricing and sales programs. Materials that contain confidential information, such as notebooks, e-mail, memos, etc., should always be securely stored and shared only on a need-to know basis.

Intellectual Property

Our ideas, concepts and other information we produce are important assets to the Partnership Group. This "intellectual property" is central in developing new products and attracting new business opportunities. Examples of intellectual property include patents, trademarks, copyrights and trade secrets.

We are responsible for identifying and protecting the Partnership Group's intellectual property at all times. In addition to protecting the intellectual property of the Partnership Group, we will also afford this same respect toward the intellectual property of others.

Q&A

My group is receiving new personal computers and printers. The local elementary school in my neighborhood could really use the old equipment. May I donate it to the school on the Partnership's behalf?

Though equipment may be obsolete, there are other factors that must be considered before the Partnership Group chooses to discard or donate it, such as accounting practices and contribution policies. Therefore, check with management before making a donation of Partnership Group property.

If a supplier inadvertently leaves a document in my office that is related to a competitor's product, can I keep or make a copy of the document and share it with others to benefit the Partnership?

No. The document may be confidential and cannot be disclosed without proper authorization. Reviewing it would violate our policy and may lead to a lawsuit. Once such a document is discovered, it should be brought to the attention of your supervisor and the Williams Legal Department.

CONTACTING THE WILLIAMS BUSINESS ETHICS RESOURCE CENTER

Call:

1-918-573-2139

1-800-324-3606 (Action Line, if you want to call anonymously)

Stop by:

38th Floor of The Williams Tower

FAX:

1-918-573-6831

E-Mail:

actionline@williams.com

Regular Mail:

Williams Pipeline Partners L.P.

One Williams Center

Tulsa, Oklahoma 74172

Attn: Business Ethics Resource Center, MD 38-4