



Introduction / PR Information:

a) Brief description of the company's services and extent of operations.

Originally founded in 1906 as an intrastate natural gas pipeline business in Oklahoma, ONEOK, Inc. is a Fortune 500 energy company and one of the nation's premier energy companies involved in the natural gas and natural gas liquids businesses. ONEOK has evolved from a traditional natural gas distributor into a diversified energy company. We are the general partner and own 43.4 percent of ONEOK Partners, L.P., one of the largest publicly traded master limited partnerships, which is a leader in the gathering, processing, storage and transportation of natural gas in the U.S. and owns one of the nation's premier natural gas liquids systems. ONEOK has three natural gas distribution companies: Oklahoma Natural Gas, Kansas Gas Service and Texas Gas Service – serving more than 2 million customers in Oklahoma, Kansas and Texas. Our nearly 4,900 employees work each day to provide safe, reliable energy and services to a wide range of diverse customers in the more than a dozen states where we operate.

b) Brief statement about your organization's guiding principles or core values.

ONEOK's values guide our decisions and drive responsible actions. We ask all employees to commit to our company's values of ethics, quality, diversity, value and service, and to apply them to all aspects of our business. They guide expectations for employee behavior and, just as importantly, they set an expectation for those outside the company – our stakeholders.

Values:

Ethics: Our actions are founded on trust, honesty and integrity through open communications and adherence to the highest standards of personal, professional and business ethics.

Quality: Our commitment to quality drives us to make continuous improvements in our quest for excellence.

Diversity: We value diversity, as well as the dignity and worth of each employee, and believe that a diverse and inclusive workforce is critical to our continued success.

Value: We are committed to creating value for all stakeholders – employees, customers, investors and our communities – through the optimum development and utilization of our resources.

Service: We provide responsive, flexible service to customers, and commit to preserving the environment, providing a safe work environment and improving the quality of life for employees where they live and work.

Mission: As a responsible corporate citizen, ONEOK provides reliable energy and energy-related services in a safe and environmentally responsible manner to our stakeholders.

c) Identify and summarize the top three processes, tools or practices that your company uses to reinforce ethical behavior in your business operations. In other words, what do you feel are the most effective methods used by your organization in maintaining its commitment of high standards?

Through the years, many policies, training practices, reviews and resources have been developed and implemented to ensure our core values are followed each day by our employees. Our top three practices and processes are below. These practices, combined with the numerous others detailed in the following pages of this application, create and cultivate an environment that ensures ONEOK's commitment to our core values is more than words written on a page – they guide our actions every day.

1.) "Tone from the top" through supervisor and leadership training: ONEOK's management emphasizes the importance of the company's integrity as well as employees' personal integrity. ONEOK leadership walks the talk. We created our corporate compliance and ethics department to develop, implement and oversee companywide compliance and ethics initiatives.

2.) Employee involvement and feedback: Employee surveys, performance reviews, exit interviews, employee feedback on ONEOK's intranet articles and companywide face-to-face employee meetings with senior management, including Chairman and Chief Executive Officer John Gibson, provide consistent opportunities for two-way communication.

3.) Ethics training and communication/reinforcement of the Code of Business Conduct and Ethics: Employee annual code review and acknowledgments, new hire corporate compliance training, live in-person code and ethics group training presentations, supervisor and leadership training, disciplinary actions for violations that involve training reinforcement and the availability of our hotline to report Code of Business Conduct and Ethics violations continually reinforce our efforts.



d) Contact information and website address.

ONEOK, Inc.

Neal Lehman

Vice President and Associate General Counsel - Compliance and Ethics

100 West Fifth Street

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Applicant Data

Organization Name: ONEOK, Inc.
Person Completing Application: Neal Lehman
Title: Vice President and Associate General Counsel - Compliance and Ethics
Phone: 918-588-7906
Mailing Address: 100 West Fifth Street, Tulsa, Oklahoma 74103
Email Address: neal.lehman@oneok.com

Please indicate the size of your organization:

What percentage of your total (full-time) workforce is based in Oklahoma? 52 percent in Oklahoma

Indicate the total number of employees working within the United States: 4,849 employees

Based on the number of employees in the U. S., indicate your company size category by checking the appropriate box below: **Large:** For-profit organization with more than 500 employees in *total* organization.

Does your organization involve franchising? No

Name and Location of Parent Organization (if different than above): N/A

Is your company publicly regulated? Yes

Do you have a formal governance program in place? Yes

The ONEOK and ONEOK Partners Boards of Directors provide independent oversight of our business and play an important role in setting company strategy. The boards have adopted many best practices in the area of corporate governance, including separate board committees at ONEOK for areas of audit, governance and executive compensation and separate board committees at ONEOK Partners for areas of audit and conflicts; written charters for each committee; a code of business conduct; and corporate governance guidelines. ONEOK's board is made up of a majority of independent directors, and all members of the Audit, Compensation and Governance Committees are independent. ONEOK Partners' board is also made up of a majority of independent directors, and all members of the Audit and Conflicts Committees are independent.

These governance controls were built upon a strong foundation of internal financial and compliance controls developed over the years. We continue to review and improve our corporate governance policies and practices to keep them current with the latest legal requirements and the best practices of other public companies. See the following corporate governance-related attachments:

- Tab A.1: Corporate Governance Committee Charter*
- Tab A.2: Corporate Governance Guidelines*
- Tab A.3: Audit Committee Charter*
- Tab A.4: Code of Business Conduct and Ethics*
- Tab A.5: Whistleblower Policy - Procedure to report complaints regarding accounting or auditing matters*



Tab A.6 *Statement of Policy Regarding Conflicts of Interest
Executive Compensation Committee Charter
Executive Committee Charter
Compliance & Ethics Office*

Do you have a conflict of interest policy in place? Yes

ONEOK's Code of Business Conduct and Ethics contains a section on conflicts of interest, and we also have a separate Statement of Policy Regarding Conflicts of Interest. It is ONEOK's policy that all employees avoid any situation or activity that involves, or may appear to involve, a conflict between the employee's personal interests (financial or otherwise) and the interests of ONEOK. In 2012, in an effort to standardize the process, we developed a new form – the "Request for Determination – Potential Conflict of Interest Form." This provides employees with a simple guide to follow when submitting a request for determination. *[Tab A.6: Excerpt from Code re Conflict of Interest; and Statement of Policy Regarding Conflicts of Interest; and Request for Determination form and Examples of when to submit]*

Our employee conflict of interest determination requests more than tripled in 2012, compared with 2011, specifically due to the heightened employee awareness of ONEOK's conflict of interest policy, the in-person training by our vice president and associate general counsel-compliance and ethics and the roll out of the new conflict of interest request form. In 2012, 68 conflict of interest requests were submitted, compared with 21 in 2011.

Financial Health:

Please describe the financial health of your organization:

ONEOK's operating income has increased 34 percent since 2007, driven by growth at ONEOK Partners. ONEOK Partners completed more than \$2 billion in growth projects from 2006 to 2009 and has announced approximately \$5 billion in growth projects expected to be completed by 2015. We have created exceptional value for our shareholders. Since January 2006, we've increased our dividend 15 times, representing a 157 percent increase during that period. ONEOK is a Fortune 500 company and the top-ranked Oklahoma-based company on the list – ranking number 175 with more than \$15 billion in revenues. ONEOK's Chairman and Chief Executive Officer John Gibson stated "...we are especially proud of our being ranked sixth on the list of the 20 Biggest Stock Gainers in the FORTUNE 500, delivering total shareholder returns of more than 60 percent in 2011." *[Tabs A.7 and C.14: Articles regarding FORTUNE Magazine ranking]*



I. Leading with Integrity:

Leaders are expected to set the right tone for ethical behavior to flourish in their organizations. While latter aspects of this application will gauge additional methods used to promote an ethical culture, this section specifically focuses on leadership.

A. How does your company hold managers accountable for ensuring that integrity is an integral component of your company’s success?

What does “Doing The RIGHT Thing” mean to you? “Honor your leaders, assistant leaders and your fellow team members as yourself, treating one another fairly. Doing the right thing even when no one is looking.” – *Twilla Osagie, Oklahoma Natural Gas Company Information Center Team Leader, Oklahoma City*

ONEOK’s values of ethics, quality, diversity, value and service are a part of every decision we make. Our leaders set the example of how ONEOK employees are expected to act, treat customers and employees, and do business in our communities. The ONEOK Leader Expectations – a guideline for employees in management positions – emphasize the importance of values, integrity, focus, initiative, courage, teamwork and the development of employees. [Tab C.8: CEO presentation excerpts on leader expectations]

Through our processes and systems, we strive to instill, cultivate and verify integrity within our leadership and employees companywide. Below are some of the key methods we use to accomplish these goals.

Instilling Integrity

- **Board of Directors Oversight:** The ONEOK Board of Directors has adopted many best practices in the area of corporate governance, including separate independent board committees for each of the areas of audit, governance and executive compensation; written charters for each committee; a Code of Business Conduct and Ethics; and corporate governance guidelines. At every in-person audit committee meeting, members are updated on conflict-of-interest determinations and hotline and complaint reports. [Tabs A.1, A.2, A.3 Corp Governance Charter; Corp Governance Guidelines; Audit Committee Charter]
- **Creation of Compliance and Ethics Department:** ONEOK created an officer-level position in 2010 to oversee companywide compliance with rules, regulations and laws and for the development and implementation of continuing antitrust compliance and ethics training. Neal Lehman, vice president and associate general counsel - compliance and ethics, reports jointly to ONEOK’s general counsel and chief executive officer, and also attends the Board of Directors Audit Committee meetings. In 2012, a corporate compliance and ethics coordinator was hired to manage the creation and implementation of various compliance and ethics initiatives and training taking place companywide. [Tab C.9: Gibson’s article–introducing Neal Lehman, corporate compliance initiative]

Cultivating Integrity

- **ONEOK Hotline:** The ONEOK Hotline provides all employees, customers and suppliers a way to report any alleged wrongdoing, helping to ensure ONEOK’s leadership is held accountable for acting with integrity, honesty and in accordance with our Code of Business Conduct and Ethics. Upon receipt of a hotline complaint, the chair of the Board of Directors Audit Committee is notified as well as the following members of ONEOK’s senior management team: chairman of the board and chief executive officer, president, general counsel, and the vice president and associate general counsel-compliance and ethics.
- **Supervisors and Managers Training Program:** In 2012, our human resources attorneys piloted a new supervisor training program – “Trust and Verify – Supervisory Responsibility” – that reinforces the importance of accountability and setting a good example for employees. The program also stresses the importance of verifying employee productivity by performing audits of employee activities and verifying work progress. It is anticipated that with this training, supervisors will be more vigilant in identifying and preventing potential incidents in the field, which could reduce the number of complaints our legal department receives. Additional training classes taught by our human resources attorneys, “Employment Law Basics” is provided to supervisors and employees in management positions. Some of the topics covered in the training include being a leader and manager at ONEOK; performance



management and development; the ONEOK Code of Business Conduct and Ethics; compliance training; and corrective action and discipline training. [Tab C.10: ONEOK Leader Expectations training material excerpts; and Supervisor's Responsibility - Code of Business Conduct and Ethics]

Verifying Integrity

- **Internal Audits:** Our internal audit services department is a group of highly skilled and trained professionals with more than 215 years of collective experience, holding several professional certifications that require annual ethics training. The department conducts financial and operational audits companywide to examine and evaluate the effectiveness and efficiency of business activities. Our internal audit plan is presented to the ONEOK Board of Directors Audit Committee each year for approval. Auditing governance and compliance activities are ongoing. The findings are communicated to management of the respective business units who are then required to develop an action plan and provide the plan to our audit department. The department tracks completion dates to ensure issues are addressed on schedule. Missed deadlines are reported to senior management and the ONEOK Board of Directors Audit Committee. Additionally, every other year, our audit department conducts the Governance Risk and Compliance (GRC) audit, which is a specific audit of the company's governance, risk and compliance activities. The 2009 GRC audit resulted in the implementation of a formal Records-Retention Policy (part of the company's corporate compliance initiative) and updating the Code of Business Conduct and Ethics to include a question-and-answer section with real-world examples. No audit observations or risk considerations were identified as a result of the 2011 GRC audit.

[Tab C.11: More Details – Additional ways management is held accountable]

B. What indicators do you use to determine the effectiveness of your management team's endeavors to promote ethical behavior? In other words, how do you know the efforts are truly working?

Ethical behavior is something that is difficult to measure. ONEOK judges the effectiveness of our processes by looking at what we say about ourselves, what we learn about ourselves and what others say about us.

What We Say About Ourselves

- **Employee Ethics Quotes:** In 2012, through an article on our internal website, we asked employees, "What does 'Doing The RIGHT Thing' mean to you?" The response was overwhelming and several of those responses are being featured on bi-monthly ethics posters in breakrooms companywide in an effort to promote awareness of the ONEOK Hotline and encourage employees to report unethical behavior. Page footers of this application contain some of the employee quotes. [Tab C.12: Employee ethics quote posters; and ONEOK Today story requesting employee ethics quotes]
- **Employee Retention:** In 2012, we retained 93 percent of our nearly 4,900 employees. The 7 percent we did not retain included retirements, resignations and terminations. Currently, we have more than 2,500 employees with at least 10 years of service with ONEOK, representing more than half our workforce. Additionally, we have approximately 1,600 employees who have more than 20 years of service at ONEOK, representing one-third of our workforce. John Gibson, ONEOK chairman and chief executive officer, often says, "Our employees are ONEOK's most important asset." Our employee retention record shows they are treated accordingly. In 2012, we had more than 13,000 people apply for approximately 450 positions that were filled with external candidates. This high demand shows that ONEOK's good reputation is well-known in the industry.

What We Learn About Ourselves

- **Employee Surveys:** In 2010, we conducted an independent, companywide employee survey where employees were asked to provide confidential feedback about the company and its culture, processes, management and performance. Of the 3,655 employees who participated, 68 percent had a favorable view of ONEOK overall – in line with industry norms. The survey also revealed that 61 percent felt that senior management's business practices are ethical and honest, while 27 percent remained neutral. Additionally, 71 percent of respondents said they "have confidence in the leadership ability of their supervisor." Members of the executive leadership team were assigned to determine root causes of dissatisfaction and make recommendations to address areas for improvement. Multiple communications have been published to keep employees informed on progress since the survey. Our 2012 survey of more than 1,000 employees in preparation for the *Great Place To Work* award application resulted in 82 percent of respondents stating "management is honest and ethical in its business practices" and 81 percent stating "my supervisors treat me with respect and dignity." Additionally, 87 percent agreed with the statement "when I look at what we accomplish, I feel a sense of pride," and 86 percent acknowledged they are proud to tell others they work for ONEOK. These results show that our employees



possess great pride in ONEOK. [Tab C.13: *Employee survey data; and Survey Findings; and ONEOK Quarterly story survey summary*]

- **Exit Interviews:** When employees leave ONEOK, they are given the opportunity to participate in an exit interview. Of the 170 exit interviews completed in 2011 and 2012, 97 percent of the interviewees said they were unaware of anything that could be interpreted as illegal or that would represent a violation of the Code of Business Conduct and Ethics. All concerns raised during the exit interviews were investigated. Of the 105 exit interviews completed in 2012, 86 percent agreed that their supervisor followed company policies and procedures, and 83 percent agreed they would recommend ONEOK as a good place to work.

What Others Say About Us

- **ONEOK's Reputation, Awards and Achievements:** Our reputation and achievements reflect how highly we value integrity and ethics. In December 2011, ONEOK was named to *Oklahoma Magazine's* list of Oklahoma's Best Companies to Work For and was also named one of Tulsa's best places to work by the *Tulsa Business Journal's* Employees' Choice Program. In 2012, ONEOK was ranked 175 on *FORTUNE Magazine's* List of the 500 Largest Corporations in America. ONEOK remains the top-ranked Oklahoma-based company on the list. ONEOK has been ranked among *FORTUNE Magazine's* list of the "World's Most Admired Companies" four of the last eight years. In 2010, we ranked first in quality of management and second in quality of products and services. See the attachment for other ONEOK achievements. [Tab C.14: *OK Magazine article; and Fortune magazine ranking story; and ONEOK's list of achievements*] [Tab C.15: *More Details – Additional effectiveness indicators*]



II. Cultivating an Ethical Culture:

Rules are not enough to promote good conduct in an organization. Companies must build and continually reinforce a culture that promotes integrity in the workplace.

A. Please provide a definition of ethical behavior as it relates to your particular organization. Explain how you ascertained your definition.

Why are ethics and compliance important? “Ethics and compliance not only help to maintain a pleasant and comfortable work environment, but they also contribute to the company’s culture of professional, caring and ethical employees. A company with strong ethics is a company with strong performance.” – Marianne Sicking, Kansas Gas Service communications consultant, Overland Park, Kansas

ONEOK’s actions are founded on trust, honesty and integrity through open communications and adherence to the highest standards of personal, professional and business ethics (from the ONEOK Values). We ask all employees to commit to ONEOK’s values and beliefs, and to live them every day. We encourage employees to have the courage to *do the right thing*.

“Do The RIGHT Thing” Initiative – In 2011, ONEOK introduced a new initiative to promote ethical behavior companywide. The theme of the initiative is “Do The RIGHT Thing,” a slogan that is consistent throughout all the related communications. “Do The RIGHT Thing” was developed with the combined efforts of our vice president and associate general counsel-compliance and ethics, corporate communications and senior management. This initiative was created to enhance and reinforce the existing ethical culture already in place and provide additional training for and encouragement and confidence in our employees. “Do The RIGHT Thing” has a strong presence with high visibility throughout the company. The initiative is promoted companywide on our employee intranet, in publications and in communications from our chief executive officer.

B. Please describe any codes, principles or values that are inherent in your organization.

At ONEOK our values are Ethics, Quality, Diversity, Value and Service. We believe that it is one thing to simply state our values; it is another to see our values in action. ONEOK’s values are being applied through employee-driven activities. We know our employees demonstrate these values through the following programs:

Our Values In Action

- **ONE Trust Fund:** The ONE Trust Fund is a voluntary-assistance program created by employees to help our fellow employees in times of need, personal crisis due to natural disasters, medical emergencies or other hardships. Employees support the fund by donating money or unused vacation days. The ONEOK Foundation matches contributions to the fund dollar for dollar up to \$5,000 per employee per calendar year, and all funds received from paper recycling at our headquarters also go to the ONE Trust Fund. In 2011 and 2012, 65 employees received \$102,295 in financial assistance, and more than 4,900 hours of vacation were donated to 89 employees. In 2012, nearly 500 employees donated financial assistance and vacation time to co-workers. *[Tab D.21: ONE Trust Fund magazine article and brochure, and Donating Vacation Time story]*
- **Employee Volunteer Program – Volunteers With Energy:** Volunteers With Energy (VWE), the company’s volunteer program established in 2003, allows employees, retirees and family members to participate in community projects of a charitable nature. Projects range from collecting hygiene products for local shelters to building Habitat for Humanity houses. Our employees volunteer annually to build homes for Habitat for Humanity. Since 2005, our volunteers have built eight homes in the Tulsa area. We also have



financially contributed to and built homes in Norman and Muskogee as well as other locations outside of Oklahoma. In 2011 and 2012, our employees invested more than 21,000 volunteer hours in our communities with a value of \$478,230*, reaffirming that ONEOK is indeed addressing a critical need in the communities we serve. Oklahoma-based employees alone volunteered more than 9,000 hours to organizations in their communities. (*Based on the estimated volunteer-hour value of \$21.79.)

- **ONEOK Women in Leadership (ONEWIL):** ONEWIL was established to assist women with professional and personal development, help them focus on business goals and objectives that support the company and provide mentoring and educational opportunities. It is open to all ONEOK employees and currently has more than 425 members companywide. ONEWIL's Tulsa chapter is sponsoring an apartment at the Lindsey House of Tulsa, a transitional living center for women and their children who are temporarily homeless. [Tab D.22: ONEWIL article]
- **LIVE Smart:** A health and wellness initiative launched in 2011 to provide employees with smart living choices. We regularly provide employees with healthy-living tips and information, support employee-driven weight loss competitions and host health and wellness fairs throughout the company. Each week we provide boxes of fruit for employees to choose a snack from for a minimal fee as a healthier alternative to vending machine snacks. The American Heart Association recognized our efforts to promote a wellness culture by naming us a gold-level Fit Friendly company in July 2012. We also were recognized recently by the Oklahoma State Department of Health, Oklahoma Academy, State Chamber of Oklahoma and Oklahoma Turning Point Council as a Certified Healthy Business, receiving the Excellence Award – their highest award.

[Tab D.23: More Details – Other codes, principles, values inherent to ONEOK]

1. What steps does your company take in the selection process to ensure that new recruits' values are consistent with that of the organization?

- **Behavior-Based Interviewing:** ONEOK has established a list of core competencies tied to company norms, values, ethics, culture and diversity that is used as part of the interviewing and hiring process. ONEOK uses behavior-based interview questions derived from that list to identify candidates who represent the best organizational and job fit. When interviewing applicants for employment, we use an interview guide that provides questions regarding ethical scenarios so that we are able to gauge their level of integrity and personal morals. [Tab D.26: Interview Guide excerpts, and Behavior Based Questions excerpts]
- **Background Checks and Drug Screening:** Potential employees are subject to drug and alcohol screening and background checks as part of the pre-employment protocols. ONEOK does not merely follow Department of Transportation (DOT) requirements, we also have a non-DOT drug and alcohol testing policy, through which employees are subject to random screenings during their employment per ONEOK's Drug-Free Workplace Policy. Twenty-five percent of our employee base is tested annually. ONEOK also offers an Employee Assistance Program to help with addictions and a variety of other issues.

[Tab D.27: More Details – Ensuring recruits' values are consistent with ONEOK values]

2. What is your process for ensuring that the organization's values are embraced by new employees?

- **New-hire Onboarding Program and Orientation:** New employees are introduced to ONEOK's policies, procedures and compliance requirements during new-hire orientation. A human resource representative holds a face-to-face meeting with each new employee, usually during their first week of employment, and provides them with a "Welcome to ONEOK" binder and PowerPoint presentation. This detailed information includes the company's values, mission, vision, Code of Business Conduct and Ethics and corporate compliance training. It also includes an overview of important policies such as the Antitrust Guidelines, Harassment Policy and an entire section devoted to ONEOK Corporate Policy Compliance, which was updated in 2012. Supervisors receive an orientation checklist to assist them with the orientation process and are required to perform 30-, 60- and 90-day follow-ups with new employees. [Tab D.29: New hire onboarding article; Excerpts from new hire presentation and Welcome to ONEOK booklet; and Supervisor follow-up form]
- **New-hire Corporate Compliance Training and Code Acknowledgment:** The corporate compliance and ethics coordinator enrolls all new hires in an online acknowledgement of the company's policies, including the Code of Business Conduct and Ethics. All new hires are required to read and acknowledge the Code of Business Conduct and Ethics. We track enrollment to ensure completion within the new hire's first week at ONEOK.
- **Performance Feedback Assessments:** Professional and personal development is a priority at ONEOK. A performance-feedback system encourages ongoing dialogue between managers and their employees to ensure that evaluations and feedback are taking



place year round. Each year, employees work with their supervisors to create personal development plans and list internal customers who can provide feedback on their progress. This peer-review system is another tool that encourages accountability among employees. Approximately 4,000 (non-bargaining unit) employee performance reviews were completed in 2012, with 98 percent of employees receiving a rating of “meets expectations” or “exceeds expectations.” *[Tab C.16: CEO email-Performance Discussions Are Important]*

[Tab D.30: More Details – Additional processes ensuring ONEOK’s values are upheld by new employees]

C. Describe any other processes that your company may have in place to ensure that an ethical culture is consistently reinforced. In sharing these examples, please provide measures the company uses to determine the effectiveness of these processes.

- **“Do The RIGHT Thing” Initiative:** This initiative was started in 2011 by Neal Lehman, vice president and associate general counsel - compliance and ethics, who sent a letter to all 4,800 employees encouraging ethical practices on a daily basis.
 - **Pocket Guide to Ethics:** Accompanying the letter was a wallet-sized “pocket guide to ethics” for employees to reference should they find themselves in an ethical dilemma. This pocket guide and Lehman’s letter are now included in the welcome packet for all ONEOK new hires. *[Tab D.33: Pocket Guide to Ethics and Lehman’s letter to employees]*
 - **Ethics Posters:** We developed a series of ethics posters that are sent to each of ONEOK’s 187 locations and displayed in breakrooms as a reminder to “Do The RIGHT Thing” and to encourage the use of the ONEOK Hotline. A new poster is distributed every other month. *[Tab D.34: Ethics Posters]*
 - **Call for Employee Ethics Quotes:** In 2012, through an article on our internal website, we asked employees, “What does ‘Doing The RIGHT Thing’ mean to you?” The response was overwhelming and several of those responses are being featured on the bi-monthly ethics posters in breakrooms companywide. *[Tab C.12: Employee Ethics Quotes Posters]*
 - **Ethics Articles – “Do The RIGHT Thing” Website:** In 2012, we created the “Do The RIGHT Thing” website on our intranet. Ethics-based articles are posted twice a month featuring topics from a section of our Code of Business Conduct and Ethics. The sections are selected based on trends seen in hotline calls and complaint issues. This page also features short humorous ethics videos that coincide with that week’s article. Since its inception, the number of page views has increased by more than 600 percent. See the attached readership analytics graph for more details. *[Tab D.35: Do The RIGHT Thing webpage screenshots, articles and Readership analytics graph]*
 - **Famous Ethics Quotes – Employee Intranet:** In 2012, we implemented a flashing banner across the top of ONEOK Online, our employee intranet, which intermittently displays famous ethics quotes that change every two weeks and are accompanied by our “Do The RIGHT Thing” logo. *[Tab D.35: Ethics quote screenprints]*
- **Live In-Person Ethics Training:** Since implementation in 2011, as part of the *Do The RIGHT Thing* initiative, Neal Lehman, vice president and associate general counsel- compliance and ethics, has given a total of 106 in-person training presentations at 50 locations to more than 3,000 employees, which is approximately 63 percent of our employees. Of those 106 presentations, 25 were Antitrust Guidelines training and 81 were Code of Business Conduct and Ethics training. The locations of the in-person ethics presentations are partly determined by the trends we are seeing with incoming hotline calls and other complaints tracked within our database. Problem locations are targeted for these ethics presentations as well as continuing ethics education at other locations. The presentations have been well-received. Since these began, we have seen an increase in complaint reporting due to employees’ heightened awareness. *[Tab D.31: Code of Business Conduct and Ethics presentation]*
- **Annual Code of Business Conduct and Ethics Acknowledgement:** Every employee is required annually to electronically acknowledge that they have read and agree to comply with the following policies: Code of Business Conduct and Ethics, Statement of Policy Regarding Conflict of Interest and the Securities and Insider Trading Policy. They also acknowledge they are not aware of any current violations of the Code of Business Conduct or these policies. The corporate compliance and ethics coordinator sends reminders to any individuals who fail to complete the acknowledgment on time, and reminder articles are posted to our employee intranet. Senior management also receives a report of who in their business segments has not completed the acknowledgements. This process holds employees and managers accountable. ONEOK had a 99.6 percent acknowledgment rate in 2011 and a 99.9 percent acknowledgment rate in 2012, with the 0.1 percent attributed to those employees who were out on leave.

[Tab D.36: More Details – Additional processes ensuring ethical culture is reinforced]



D. How does your organization recognize and/or reward those employees, customers, vendors or partners who have gone “above and beyond” in their demonstration of highly ethical principles?

- **ONEOK Recognition Award Program:** The ONEOK Recognition Award Program is an employee-recognition program for rewarding individuals who have accomplished an extraordinary achievement within the workplace. All non-officer, full-time and part-time employees are eligible. Recipients are approved by the executive leadership team and receive a one-time monetary award of up to \$5,000 and recognition from their peers and managers. In 2013, our corporate compliance and ethics coordinator received this award for her outstanding performance. *[Tab D.40: ONEOK Today story on Recognition Award Program]*
- **Larry Brummett Courage Award:** Beginning in 2013, ONEOK will annually award a deserving employee the Larry Brummett Courage Award. Larry Brummett served as chairman and chief executive officer of ONEOK from 1994 until his death from cancer in 2000. The Larry Brummett Courage Award has previously been awarded to a local student athlete, whose characteristics exemplify those that Larry Brummett stood for – determination, courage and community service. Now, in an effort to continue to honor Larry’s legacy, and help exemplify what being a leader at ONEOK really means, the company will begin annually naming an *employee* as the recipient of this prestigious award. Even though Brummett was successful in business, he is most remembered for his integrity, compassion and determination to help others. , The company encourages employees to nominate a worthy colleague as a recipient, one who exemplifies one or more of the following characteristics: ethical and values-driven leadership; determination and courage; overcoming a significant adversity; spirit of community service; and an innovative mindset. John Gibson, chairman and chief executive officer, will present the recipient with a significant monetary award as well as a crystal eagle trophy. *[Tab D.41: ONEOK Email – Larry Brummett Award]*
- **One Good Deed Volunteer Recognition Award:** ONEOK’s volunteer recognition award, ONE Good Deed, helps recognize employees who volunteer in the communities where they live. Employees chosen to receive this award are featured in an article on the homepage of our employee intranet under a section titled “Community Matters,” and each receives a \$100 grant to be given to their favorite nonprofit organization. Since the program’s inception in August 2010, 22 employees have received the award. *[Tab D.42: Community Matters story-ONE Good Deed]*

[Tab D.43: More Details – Several ONEOK employee recognition and award programs]

E. How does your company monitor and respond to breaches of ethical behavior?

- **Investigation and Response to Violations:** The company promptly investigates complaints and other reports of alleged unethical behavior and Code of Business Conduct and Ethics violations according to our policies, which have in some instances resulted in terminations. Employees can report concerns to the ONEOK Hotline or speak to a manager, a member of human resources, the legal department or to the compliance and ethics department (compliance-ethics@oneok.com). Upon receipt of a hotline complaint, the chair of the Board of Directors Audit Committee is notified as well as the following members of ONEOK’s senior management team: chairman of the board and chief executive officer, president, general counsel, and the vice president and associate general counsel-compliance and ethics. In 2011, we received 87 concerns from employees or third parties. In 2012, we received 149 concerns. These concerns were investigated and resulted in either the finding of no violation or disciplinary action, employee counseling, training, suspension or termination. We attribute the increase in complaints to the heightened employee awareness of our Code of Business Conduct and other policies due to our training and live ethics presentations. ONEOK’s Discipline Policy serves as a consistent guide when handling issues regarding ethical behavior or failures to meet responsibilities or follow company rules.
- **Complaints Database and Reporting:** In 2012, we developed a robust complaint database and reporting system where all complaints and other reports of unethical behavior and violations, no matter notification method, are compiled and tracked to ensure every complaint companywide is investigated, reported and resolved in a timely manner. It also facilitates consistency in disciplinary actions. Trends in complaints are tracked and routinely provided to the individual business units, human resources, senior management and other interested groups to help identify problem locations or repetitive complaints that would warrant employee training, counseling or in-person presentations concerning our Code of Business Conduct and Ethics. The database tracks the number of complaints received for the various issues such as harassment, retaliation, discrimination and conflicts of interest. We communicate these reports to our audit committee three times a year at the in-person audit committee meetings. We report the status of all pending complaints to the vice president and associate general counsel-compliance and ethics on a weekly basis. Complaints also are communicated promptly to our chairman and chief executive officer, president and general counsel. In comparing 2012 with 2011, we have seen an increase in the number of hotline calls and other complaints, and we attribute this spike



2013 OK ETHICS COMPASS AWARD APPLICATION



to the high visibility of our “Do The RIGHT Thing” initiative, including our new website and the in-person ethics training. *[Tab C.18: Graphs of Complaints]*

- **Non-Retaliation Policy:** ONEOK’s Non-Retaliation Policy ensures that employees cannot lose their job or benefits, or be demoted, suspended, threatened, harassed or discriminated against for raising a concern. This is reiterated to the parties of each complaint. *[Tab D.45: Retaliation Excerpt from Code of Business Conduct and Ethics]*

[Tab D.46: More Details – How ONEOK monitors and responds to breaches of ethical behavior]

What does “Doing The RIGHT Thing” mean to you? “Doing The RIGHT Thing’ means striving for excellence in every decision or action made in my daily life. Excellence is a favorable trait everyone has a chance to attain.” – *Chris Leon, Oklahoma Natural Gas Company customer service manager, Oklahoma City*



III. Fortright **Communications:**

Transparency is a term that has broadened beyond the standard reference to accounting procedures.

A. How does your company demonstrate open/transparent communication occurs throughout the organization?

What does “Doing The RIGHT Thing” mean to you? “As I read this question, honesty comes to mind. This single word represents what ONEOK’s values are all about.” – Joe Alvarado, Texas Gas Service field technician, El Paso, Texas

- **Chief Executive Officer Communications:** Our intranet, ONEOK Online, features a column written by John Gibson, our chairman and chief executive officer, which highlights important issues, upcoming events and employee encouragement. Employees are encouraged to post comments to his columns. Gibson frequently sends out emails to all employees regarding important issues and also writes a column titled “ONE-ON-ONE” for the *ONEOK Quarterly* magazine that is sent to all employees’ and retirees’ homes each quarter. New employees are welcomed to the company with a letter from Gibson. [Tab E.48: Gibson welcome letter; A Message from John article “Expectations of ONEOK Leaders”; and Gibson’s story “Together We Can Make a Difference”]
- **ONEOK Quarterly – Employee Magazine:** The *ONEOK Quarterly* is mailed to homes of employees and retirees and is another source of employee information. One recent issue had a front cover feature on “Ethics and Compliance – Doing The RIGHT Thing,” which contained helpful “What Should You Do” scenarios. Our ONEOK Hotline poster was featured on the back cover of this issue to remind employees about the hotline. Hotline administrators say employees have referenced the magazine to find the hotline number, proving the reminder was effective. [Tab E.49: Ethics and Compliance feature in magazine and back cover]
- **“Do The RIGHT Thing” articles:** In December 2012, for our Do The Right Thing webpage on ONEOK’s intranet, we published the article “Ethical Dilemmas – Putting Your Job on the Line,” in which we included the top reasons for 2012 employee terminations concerning misconduct and violations. This was our first attempt to be more transparent with employees about company actions concerning ethical misconduct. We are attempting to communicate the consequences of unethical behavior while emphasizing ethical decision making, and to show that unethical behavior is addressed when reported. We plan to provide this data to employees at least annually. This article remains one of the most-read articles since inception of the site. [Tab E.50: Ethical Dilemmas article]
- **Executive Officer Employee Meetings:** John Gibson, our chairman and chief executive officer, annually holds in-person employee meetings to address important issues and welcomes comments and questions from the audience.. In 2012, Gibson together with Terry Spencer, ONEOK president, and Pierce Norton, executive vice president, commercial, met with more than 1,600 employees at 24 different locations, which is more than one-third of ONEOK’s workforce. [Tab E.51: Story – Gibson Employee Meeting 2012]

[Tab E.52: More Details – Other Communication Methods]

How has the effectiveness of these communications been measured?

- **Increase in Complaint Reporting:** Due to the increased visibility of our compliance and ethics initiatives; the “Do The RIGHT Thing” webpage and ethics articles; and Lehman’s live in-person training of the Code of Business Conduct and Ethics, we’ve experienced an increase in reports of complaints or possible code violations confirming that our communications have been effective. [Tab C.18: Graph of Complaints]



- **Employee Surveys:** A 2010 employee survey not only provided information on employee opinions of our company, senior leadership and our operations, but also helped highlight areas where the company can improve. Survey results were reported to all employees. They revealed that 66 percent of employees agreed that their supervisor effectively communicates organizational goals and objectives and that 71 percent felt senior management communicates the direction ONEOK is headed. At the conclusion of the survey, employees had the opportunity to make comments, and we received more than 4,000. In 2012, we surveyed more than 1,000 employees in preparation for the *Great Place To Work* application, which revealed high employee satisfaction in which 86 percent acknowledged “*I’m proud to tell others I work here,*” and 82 percent agreed “*Taking everything into account, I would say this is a great place to work.*” We also routinely survey employees after every employee meeting with our executive officers. [Tab C.13: *Employee survey results*]
- **Exit Interviews:** When employees leave ONEOK, they are given the opportunity to participate in an exit interview. Exit interviews cover many topics, including, but not limited to, communication, safety, performance feedback and their supervisor. Of the 105 exit interviews completed in 2012, 87 percent of participants agreed that communications were adequate for keeping employees informed on key events, company financial performance and other company information.

How does ONEOK uphold the values of compliance and ethics? “ONEOK upholds the values of compliance and ethics by carrying out the direction that the senior leaders of the organization are setting for the employees. Our senior leadership sets a great example for every employee to follow every day of every year in compliance and ethics.” – Greg Lindblom, ONEOK director of pipeline operations, Egan, Minnesota



IV. Corporate Social Responsibility:

A. Describe your company's **strategy** with regard to issues of social responsibility or corporate philanthropy. In other words, how does your company identify which community activities to support?

What does "Doing The RIGHT Thing" mean to you? "Doing The RIGHT Thing' means being honest without exception. There is no gray area."
– Deana Gawey, ONEOK tax analyst, Tulsa, Oklahoma

Primary focus areas for ONEOK's community investments are education, health and human services, arts and culture and community improvement. ONEOK gives priority consideration to educational programs and to health and human services organizations, particularly organizations with programs that help people become self-sufficient and self-sustain. With employees and operations in more than a dozen states, we recognize and believe that good corporate citizenship is an essential responsibility. ONEOK has a long and rich history of giving back to the communities where we operate and where our employees work and live.

- **ONEOK Foundation Board of Directors:** Our commitment to investing in our communities starts at the top of our organization. The ONEOK Foundation Board of Directors is comprised of nine of our executive officers. The ONEOK Foundation was established in 1997 to enable a consistent level of contributions to charitable and nonprofit organizations in order to support the communities where ONEOK employees work and live.
- **Environment, Safety and Health Focus:** Corporate responsibility at ONEOK is about more than supporting communities financially, it is a part of our everyday business operations. We are committed to operating our assets safely, efficiently and environmentally responsibly. Over the last few years, ONEOK has made significant progress to unify, strengthen and improve our environmental, safety and health performance. *[Tab F.55: Additional information on ESH Focus]*
- **Annual Corporate Responsibility Report:** In 2012, we published our fourth annual Corporate Responsibility Report, highlighting the company's performance in the areas of safety and health, greenhouse gas emissions, conservation and community investments. This report is not a mandated publication, but we voluntarily create and distribute one annually. *[Tab F.56: "Impact: Investing in Our Communities" excerpt from 2011-2012 Corporate Responsibility Report –entire report is back pocket of binder]*

B. What has been your company's direct **impact** on the community? In other words, please state how your organizations' involvement has made a difference. Provide an overview of: **Your company's involvement in the community; and benefits to the community.**

Below are some of ONEOK's direct impacts on the community. *[Tab F.57: More Details of Community Involvement]*

- **ONEOK Foundation and Corporate Contributions:** Since its inception in 1997, the ONEOK Foundation has awarded more than \$45.4 million in grants to support nonprofit organizations throughout our operating areas. In 2012, we contributed more than \$5.3 million to support nonprofit organizations across our operating areas. See attached list of ONEOK's contributions to the communities where we operate. *[Tab F.58: ONEOK Foundation Approves Grants]*
- **Supporting Education – Public School Foundations Program:** A priority of the ONEOK Foundation has always been supporting education at all levels to ensure the viability of the future workforce. The Public School Foundations Program was established in 2002 with the goal of improving the educational experience for K-12 students in public school districts where we operate. To date,



more than \$600,000 has been awarded by the ONEOK Foundation to local school foundations for classroom-enrichment programs, school supplies and equipment, or assistance for disadvantaged students.

- **Higher Education Contributions:** ONEOK has supported higher education with legacy gifts totaling more than \$8 million. We contributed \$1 million (\$500,000 contribution/match) for a professorship in Business Ethics in the College of Business at the University of Tulsa. The endowed professorship entails an annual lecture series focused on business ethics called the ONEOK Business Ethics Lecture Series. In 2010, our chief executive officer, John Gibson, was the inaugural keynote speaker for the series. See attachments for full list of higher education contributions. *[Tab F.59: ONEOK's Higher Education Contributions]*.
- **Energy-Assistance Program:** The ONEOK Foundation is proactive in meeting the basic needs of families in the communities in which we operate through our natural gas distribution companies' energy-assistance programs, Share The Warmth. When paying their utility bill, our natural gas distribution customers are encouraged to make a contribution to aid low-income customers with home-heating costs. The ONEOK Foundation matches a percentage of annual contributions. In 2011 and 2012, the ONEOK Foundation matched 15 percent of annual customer contributions, totaling more than \$130,000.
- **ONEOK Scholarship Program:** Since it began in 1960, the ONEOK Scholarship Program has changed the lives of more than 600 students who have received their undergraduate degrees thanks, in part, to ONEOK. In 2012, ONEOK awarded 25 \$2,000 scholarships to children of employees. The scholarships may be renewed annually for up to four years as long as the students maintain eligibility. *[Tab F.60: Scholarship article "A Way of Learning"]*

To what extent are employees actually engaged in the company's social responsibility activities?

Below are some of our key employee social responsibility activities. *[Tab F.62: More Details – ONEOK Employees' Involvement]*

- **United Way Campaign:** The ONEOK Foundation provides a dollar-for-dollar match of employee contributions to annual United Way campaigns, making our total contribution to United Way since 1997 more than \$26 million. For the last four consecutive years, our Tulsa employees, with support from the ONEOK Foundation, broke the million-dollar mark and were recognized as members of The Tulsa Area United Way's "Million Dollar Club." In the 2012 United Way campaign, we raised \$1,189,877 with a 76 percent employee participation rate, contributing an average of \$330 per employee – a rate four times the national average. Together with 185 volunteers, our employees participated in fundraising activities including a rally day, pancake breakfast, book and bake sale, companywide online auction, mini-golf tournament, raffles and more. *[Tab F.63: United Way articles]*
- **Employee Matching Grants Program:** Our employee matching grants program was established in 1998 and provides a dollar-for-dollar match of employee contributions to charitable organizations, up to \$5,000 a year per employee. More than \$1.6 million has been awarded to date through this program. In 2013, retirees' contributions became eligible, with the company matching up to \$2,500 of retirees' contributions to qualifying organizations.
- **ONE Good Deed:** ONEOK's volunteer recognition award, ONE Good Deed, helps recognize employees who volunteer in the communities where they live. Employees chosen to receive this award are featured in an article and on the homepage of our employee intranet site under a section titled "Community Matters," and receive a \$100 grant to be given to their favorite non-profit organization. *[Tab F.64: ONE Good Deed...A Commitment to the Community; and Community Matters article "Nominations Being Accepted for ONE Good Deed"]*
- **ONE Trust Fund:**
See previous section B under Cultivating an Ethical Culture on page 11.
- **Employee Volunteer Program – Volunteers With Energy:**
See previous section B under Cultivating an Ethical Culture on page 11.
- **ONEOK Women in Leadership (ONEWIL):**
See previous section B under Cultivating an Ethical Culture on page 11.

[See Tab F.65: 2012-2013 ONEOK listing of community involvement and employee participation]



How does ONEOK uphold the values of compliance and ethics? “By the people ONEOK hires. I believe the employees of ONEOK show their integrity through their active roles in the office, in the field and in the community.” – Emily Reh, ONEOK process improvement analyst, Tulsa, Oklahoma

V. Building Trust in Customer Relations

Sometimes, customers’ interests may conflict with an organization’s desired revenue goals. In these situations, it may be tempting to compromise ethical standards.

How does your company monitor the effectiveness of customer relations, specifically as it pertains to handling of customer concerns in a forthright and fair manner?

What does “Doing The RIGHT Thing” mean to you? - “Doing the right thing is purposeful. We are trained to consistently uphold the company in a way that would be above reproach. When I see coworkers taking full responsibility for their area and making things happen for the best possible outcome it makes me proud to be an ONEOK Employee.” ~ Keith Landers, ONEOK IT Tech Support, Tulsa, Oklahoma

ONEOK’s commitment to quality drives us to make continuous improvements in our quest for excellence. ONEOK is committed to creating value for all stakeholders – employees, customers, investors and our communities – through the development and utilization of our resources. ONEOK strives to provide responsive, flexible service to customers, and commits to preserving the environment, providing a safe work environment and improving the quality of life for employees where they live and work. Below outlines how ONEOK monitors and ensures effectiveness of customer relations.

- **Customer Service Representative (CSR) Training:** As the eighth largest natural gas distribution business in the nation serving more than 2 million customers, ONEOK has a legacy of delivering value and service to customers for more than a century. Our three natural gas distribution companies, Kansas Gas Service, Oklahoma Natural Gas and Texas Gas Service, conduct training for all CSRs. The training curriculum is consistent among all three companies with the primary differences related to regulatory requirements. This training is administered to all new hires. In addition, a minimum of 16 hours of refresher training on select topics is required annually for all CSRs to ensure ongoing, quality customer service. We have a department that monitors calls for quality assurance and customer satisfaction. Each employee is provided with a monthly feedback scorecard, which includes results in the following areas: quality assurance, first-contact resolution, productivity, availability and dependability. Minimum standards are set for each category, and these performance metrics are used for annual goal setting and individual performance reviews, which impact salary and incentives. In 2012, we achieved our targets of 90 percent first-contact resolution and an average quality assurance score of 90 percent.
- **Customer Complaint Resolutions:** The majority of customer concerns are handled by our Information Center to better ensure consistent handling by trained CSRs. Escalated calls are referred to a team of experts for immediate resolution. The majority of customer contacts are received via telephone and, in most cases, the inquiries are handled while the customer is on the phone. Our average call length for all of our natural gas distribution companies was approximately 5.5 minutes in 2012. A specialized team handles customer inquiries received through our website. Our goal is to respond to and resolve online inquiries within 48 hours of receipt. In 2012, we achieved the following average response times for online inquiries: Oklahoma Natural Gas - 32 hours; Kansas Gas Service - 25 hours; and Texas Gas Service - 16 hours.



- **Customer Satisfaction Surveys:** In 2012, our natural gas distribution companies conducted in-house customer satisfaction surveys. A random selection of customers for which service orders were submitted was called within approximately one hour of the service order completion. The goal of the surveys was to gauge customer satisfaction with the CSR that handled the initial phone call, the technician that completed the service order or the Interactive Voice Response (if applicable). Interactive Voice Response system enables callers to use their telephone keypad (or spoken commands if speech recognition is used) to access company's computer system for the purpose of retrieving or updating information, conducting a business transaction, or routing their call. Through this feedback, we identified improvement opportunities that will enhance the customer experience. This may include process improvements, employee training or employee recognition when appropriate. Customers appreciate the opportunity to provide feedback and have their opinions heard. Through our efforts to obtain customer feedback and consistently deliver quality service, we are proud to have received recognition for customer service from several external agencies. This recognition has validated our own internal performance measurements and our commitment to customer service. Following are the 2012 customer satisfaction survey results for each of our three natural gas distribution companies.

Percentages of respondents who rated their experience with the CSR as excellent or good:

- Oklahoma Natural Gas – 91 percent
- Texas Gas Service – 97 percent
- Kansas Gas Service – 96 percent

Percentages of respondents who rated their experience with the service technician as excellent or good:

- Oklahoma Natural Gas – 99 percent
- Texas Gas Service – 99 percent
- Kansas Gas Service – 99 percent

- **Informal Feedback – Customer Praises:** At ONEOK, customer service is a priority, and we are proud of the many accolades our employees receive from customers. These accolades may come from the customer-satisfaction surveys or from customers who call or write to praise our employees for their actions. We recognize and celebrate employees for customer compliments in many different ways, including public recognition within the employee's department, a story posted on our internal company website or recognition from senior leadership. Plans are under way to create an even more robust customer service recognition program in the near future. *[Tab G.67: Customer Praises of our Employees; and Cheers from The Crowd story]*
- **National Customer Satisfaction Survey Rankings:** In 2012, our Texas Gas Service division ranked highest in the South Region of a nationally recognized business customer satisfaction survey for the third consecutive year. In 2011, Oklahoma Natural Gas went from being ranked seventh to second in the region behind Texas Gas Service and maintained its second place ranking in 2012. *[Tab G.68: ONG Ranks First in Recent Survey story; and JD Power & Associates Report-Customer Satisfaction]*

[Tab G.69: More Details - ONEOK's Monitoring & Ensuring Customer Relations Effectiveness]

What does "Doing The RIGHT Thing" mean to you? "Being accountable and considerate of the choices we make, because what we do not only affects us but also everyone around us." – Philecia Thompson, ONEOK staff accountant, Tulsa, Oklahoma



VI. Looking to the Future

A. What are some of the major ethical issues that you anticipate your employees or organization will likely encounter in the future?

There are two significant areas that likely will present ethical issues within our company. The first is the increasing use of social media by employees. As the use of social media becomes more prevalent, there is potential for employees to communicate proprietary information inadvertently or to express dissatisfaction with their job or co-workers. To help prevent these potential issues, ONEOK has enacted a social computing policy. This policy sets guidelines for employee participation in social computing and social networks. The policy also applies to other users, such as vendors and contractors, who provide services and products to ONEOK and participate in social computing.

The second area – conflicts of interest – is not a new one, but an area of continuous concern. As ONEOK’s workforce evolves and new employees are hired, there is a continuing need for ethics training. This training teaches less experienced employees to recognize situations that might present a conflict of interest. In addition, ONEOK provides supervisor training that helps supervisors teach their employees to recognize and model good ethical behavior. Supervisors also are trained to detect unethical behavior and address it appropriately.

B. What proactive approaches are you taking now, or considering taking in the near future, so that your organization is better prepared to effectively handle these types of issues?

- **Hiring and Employee Development:** Hiring the right people is the first step. We look to our values when hiring and developing employees, and we use our Attract, Develop and Retain initiative to guide our process. We are putting a larger focus on attracting not only good talent but also people who fit our culture and want to have long-term careers at ONEOK.
- **Live Ethics Training:** ONEOK’s vice president and associate general counsel - compliance and ethics will continue training employees on matters related to business ethics in an effort to expand ONEOK’s already strong ethical culture.
- **Ethics Reporting:** We will continue to monitor complaint reporting, analyze developing trends and conduct training in any problem areas.

VII. Supporting Documentation:

See Table of Contents.