

Human Exploitation Policy

ONEOK



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ONEOK Human Exploitation Policy

1. Purpose/Expectation

Human exploitation traps millions of people, including children, in horrific situations around the world, including here in the United States. Individuals who engage in human exploitation use violence, threats, deception, debt bondage and other manipulative tactics for the purpose of exploiting people, sexually and otherwise, for profit.

ONEOK, Inc. and its subsidiaries and affiliates (collectively “ONEOK” or the “Company”) are committed to conducting business in an environment free from Human Exploitation of any kind.

Thus, ONEOK has adopted this Human Exploitation Policy to reinforce its commitment.

This Policy is consistent with ONEOK’s Code of Business Conduct and Ethics, core values and commitment to conduct its business in an ethical manner and in full compliance with applicable U.S. and foreign laws.

2. Applicability

This Policy applies to all employees of the Company.

In addition, ONEOK will instruct third parties through whom it conducts business (such as contractors, suppliers, vendors, partners and others) to behave in a manner consistent with this Policy.

3. Roles and Responsibilities

ONEOK’s Vice President and Associate General Counsel – Compliance and Ethics, or his/her designee, is responsible for overseeing compliance with this Policy as well as implementing, maintaining and updating the Policy, as necessary.

ONEOK employees are responsible for reading, understanding and complying with this Policy.

4. Key Definitions

“Human Exploitation” means the recruitment, transportation, transfer, harboring, obtaining or receipt of a person, by means of a threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve control over that person for the purpose of exploitation, sexually or otherwise.

“Commercial sex acts” means any sex act on account of which anything of value is given or received by another person.

“Forced labor” means all work or service, not voluntarily performed, that is obtained from a person under the threat of force or penalty.

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5. Policy

ONEOK prohibits Human Exploitation of any kind in connection with its business.

In this regard, ONEOK employees and third parties through whom ONEOK conducts business must not engage in any practice that constitutes Human Exploitation. This includes, but is not limited to, the following exploitation-related activities:

- Engaging in any form of sex trafficking in persons;
- Procuring Commercial sex acts;
- Using Forced labor in the performance of any work;
- Intentionally destroying, concealing, confiscating or otherwise denying access by an individual to the individual's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority;
- Using intentionally misleading or fraudulent practices during the recruitment of candidates or offering of employment/contract positions;
- Knowingly using recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
- Charging applicants/candidates unlawful recruitment fees;
- If required by law or contract, failing to provide return transportation or failing to pay for the cost of return transportation upon the end of employment;
- If required by law or contract, failing to provide or arrange housing that meets the host country housing and safety standards; or
- If required by law or contract, failing to provide an employment contract, recruitment agreement or other required work document in writing.

6. Policy Noncompliance

Failure to comply with this Policy can result in serious consequences for ONEOK, its reputation as well as employees and third parties through whom ONEOK conducts business.

Employee noncompliance may result in disciplinary action, up to and including termination of employment and disclosure to law enforcement officials and government agencies.

Third party noncompliance may result in the termination of a business relationship and/or contract with ONEOK and disclosure to law enforcement officials and government agencies.

Violation of applicable laws may also result in criminal prosecution of the responsible individuals and/or entities by law enforcement officials and/or government agencies.

7. Reporting Violations

Reporting suspected violations of this Policy is critical, and we all have a responsibility to do so.

Information relating to a suspected violation of this Policy by an employee, a third party through whom ONEOK conducts business or any other individual must be promptly reported to **ONEOK's Vice President and Associate General Counsel, Compliance and Ethics**, or via the **ONEOK Hotline** at 1-888-393-6825. Call Specialists are available 24 hours a day, seven days a week to take Hotline calls. If you do not feel comfortable using your name, you can report your concern anonymously. Interpreters are available.

In addition, information relating to potential Human Exploitation may also be reported to the **National Human Trafficking Resource Center** at 1-888-373-7888. Call Specialists are available 24 hours a day, seven days a week to take calls. All reports are confidential, and you may remain anonymous. Interpreters are available. Online reports may be made to the National Human Trafficking Resource Center via the internet at <https://traffickingresourcecenter.org/report-trafficking>.

ONEOK will seek to assist employees suspected of being victims of, or witnesses to, prohibited activities.

8. Non-Retaliation

As an employee, you cannot lose your job or benefits, or be demoted, suspended, threatened, harassed or discriminated against for reporting, honestly and in good faith, suspected violations of this Policy and/or truthfully participating in a Company or external investigation. Reporting honestly means that you believe you are being truthful and accurate. If you believe someone is retaliating against you, please report it to **ONEOK's Vice President and Associate General Counsel, Compliance and Ethics**, or via the **ONEOK Hotline** at 1-888-393-6825. Call Specialists are available 24 hours a day, seven days a week to take Hotline calls. Interpreters are available. All reports of retaliation will be investigated.

9. Training

Appropriate training on this Policy will be provided to employees. The frequency and content of such training may vary depending upon the nature of an employee's responsibilities.

10. Questions Related to This Policy

Questions about this Policy should be directed to ONEOK's Vice President and Associate General Counsel, Compliance and Ethics:

Name: Patrick W. Cipolla
Email: pcipolla@oneok.com
Phone: 918-588-7781
Mail: ONEOK, Inc.
100 West 5th Street
Tulsa, Oklahoma 74103
Fax: 918-732-1455

11. Reference or Related Policies

ONEOK Code of Business Conduct and Ethics

12. Recordkeeping Requirements

ONEOK business records created or received in association with this Policy are subject to the Company's *Records and Information Management Policy* and *Records Retention Schedule*, where applicable.

13. Posting

Corporate Human Resources will oversee the physical posting of a short form "ONEOK Policy Statement against Human Exploitation" and a "Human Exploitation Awareness" flyer in common work areas at ONEOK Plaza and Field Locations.

Appendix



Human Exploitation Awareness



Are you or someone you know being exploited? Is human exploitation happening in your community?

Recognizing **POTENTIAL RED FLAGS** and **KNOWING THE INDICATORS** of human exploitation is a key step in identifying more victims and helping them find the assistance they need.

Common Work and Living Conditions: The individual(s) in question

- Is not free to leave or come and go as he/she wishes
- Is under 18 and is providing commercial sex acts
- Is in the commercial sex industry and has a pimp / manager
- Is unpaid, paid very little or paid only through tips
- Works excessively long and/or unusual hours
- Is not allowed breaks or suffers under unusual restrictions at work
- Owes a large debt and is unable to pay it off
- Was recruited through false promises concerning the nature and conditions of his/her work
- Is subject to high security measures at work and/or living locations (e.g. opaque windows, boarded up windows, bars on windows, barbed wire, security cameras, etc.)

Poor Mental Health or Abnormal Behavior: The individual(s) in question

- Is fearful, anxious, depressed, submissive, tense, avoids eye contact or nervous/paranoid
- Exhibits unusually fearful or anxious behavior after bringing up law enforcement

Poor Physical Health: The individual(s) in question

- Lacks health care
- Appears malnourished
- Shows signs of physical and/or sexual abuse, physical restraint, confinement or torture

Lack of Control: The individual(s) in question

- Has few or no personal possessions
- Is not in control of his/her own money, no financial records or bank account
- Is not in control of his/her own identification documents (ID or passport)
- Is not allowed or able to speak for themselves (a third party may insist on being present and/or translating)

Other: The individual(s) in question:

- Claims of just visiting and inability to clarify where he/she is staying/address
- Lacks knowledge of whereabouts and/or does not know what city he/she is in
- Lacks a sense of time
- Has numerous inconsistencies in his/her story

This list is not exhaustive and represents only a selection of possible indicators. Red flags in this list may not be present in all exploitation cases and are not cumulative. Learn more at www.traffickingresourcecenter.org.

To request help or report suspected human exploitation, call the **National Human Trafficking Resource Center hotline** at 1-888-373-7888 (24/7), text "HELP" to: BeFree (233733) or contact the National Human Trafficking Resource Center via the internet at <https://traffickingresourcecenter.org/report-trafficking>.