



Supplier Code of **Business Conduct & Ethics**



ethics.ONEGas.com



A letter from the President and CEO

At ONE Gas, our Core Values are the foundation of our business. We have earned a reputation as a company with integrity. Integrity matters to our customers, regulators, investors, employees, and to the communities we serve. We expect our Suppliers to adhere to the same standards of conduct and behavior that we expect from our employees while conducting business with our company.

The following Supplier Code of Business Conduct and Ethics provides guidelines for a variety of issues that may arise when dealing with our employees, customers, suppliers, competitors, or the public. It is the responsibility of our Suppliers to understand and adhere to the guidelines outlined in this Code.



Please take time to read through the following pages and think about how this Code pertains to you and your business. While this Supplier Code of Business Conduct and Ethics covers a broad range of situations, it is impossible to create a policy to cover every circumstance, especially when issues arise under contracts or local laws. If you have questions or concerns after reviewing the Code, please seek guidance from a member of our Compliance and Ethics department or your ONE Gas contact.

We regard our Suppliers as a critical and necessary extension of our values, operations, and future success, and we appreciate your commitment to making compliance and ethics a top priority as you work with ONE Gas.

Sincerely,

Sid McAnnally
President and Chief Executive Officer, ONE Gas, Inc.

Table of Contents

Core Values	4
Introduction	5
Safety	5
Environment, Safety & Health.....	5
Drug-Free Workplace	6
Violence-Free Workplace.....	6
Ethics	7
Legal and Regulatory Compliance	7
Human Rights	7
Conflict of Interest	7
Gifts and Entertainment	8
Inclusion & Diversity.....	8
Discrimination.....	8
Harassment.....	8
Service	9
Privacy and Confidentiality of Private Information	9
Record Retention	9
Value	10
Engaging in Business with ONE Gas	10
Protection and Use of Company Assets	10
Fair Competition & Fair Dealing.....	10
How to Report a Violation of this Code	11
Summary	11

Core Values



Safety

We are committed to operating safely and in an environmentally responsible manner.



Ethics

We are accountable to the highest ethical standards and are committed to compliance.



Inclusion & Diversity

We embrace an inclusive and diverse culture that encourages collaboration. Every employee makes a difference and contributes to our success.



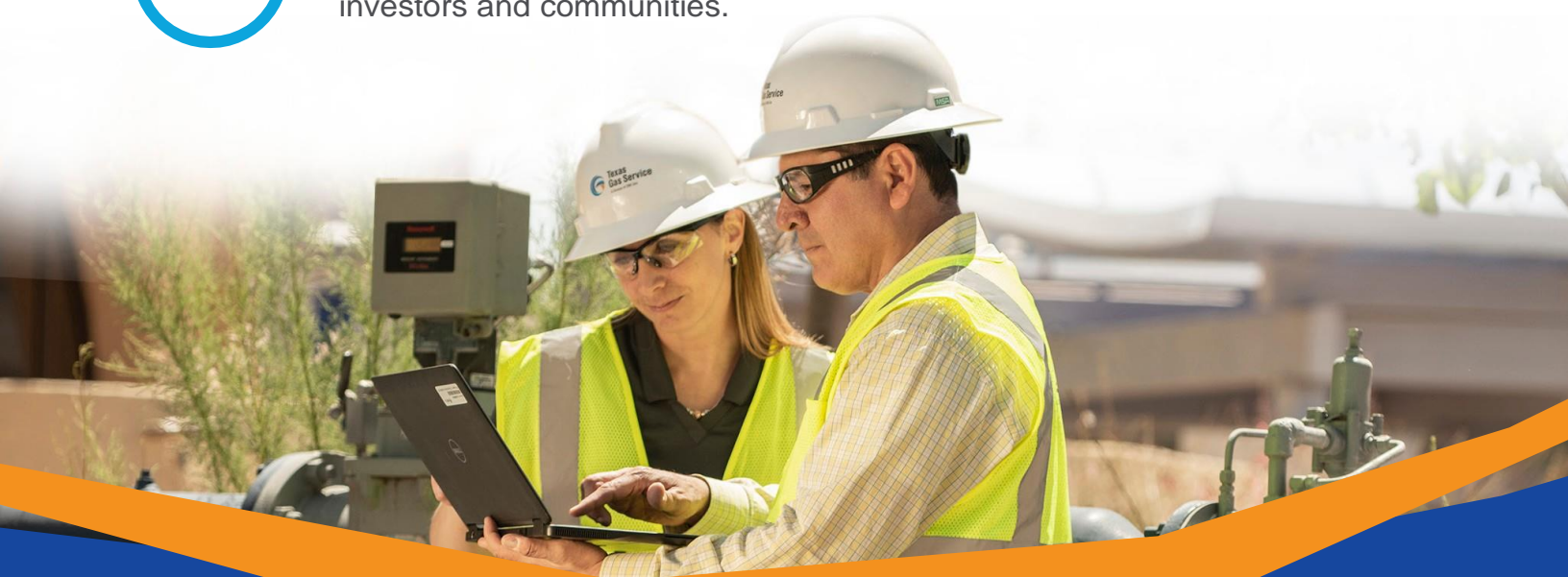
Service

We provide exceptional service and make continuous improvements in our pursuit of excellence.



Value

We create value for all stakeholders, including our customers, employees, investors and communities.



Introduction

At ONE Gas, Inc. (“ONE Gas” or the “Company”), our mission is to deliver natural gas for a better tomorrow. Our vision is to be a premier natural gas distribution company, creating exceptional value for our stakeholders. In alignment with our mission/vision and as a part of our ongoing sustainability efforts, we have developed this Supplier Code of Business Conduct and Ethics (“the Code”) to assist all of our business partners, contractors, suppliers, and vendors (“Suppliers”) in meeting our expectations of doing business as they relate to certain legal requirements, ethical practices, human rights and environmental management. Suppliers are responsible for compliance with the standards and reporting obligations set out in this Code. The Company may update the Code periodically and our Suppliers

are responsible for reviewing and complying with any changes to the Code.

ONE Gas seeks to develop and strengthen partnerships with and support the success of our Suppliers based on a shared commitment of transparency, collaboration, and mutual respect. We recognize that our Suppliers are independent businesses and the exclusive employer of their workers. However, it is possible the actions of our business partners can be attributed to the Company affecting not only our reputation, but the level of trust we have worked hard to earn from our employees, partners, and customers. The standards of this Code do not supersede the provisions of any legal agreement or contract between a Supplier and ONE Gas.

Safety



Safety is more than our number one value. It’s the foundation of who we are and drives everything we do as a company. We expect our Suppliers to operate safely and in an environmentally responsible manner.

Environment, Safety & Health

The **safety** of employees, suppliers, and the public is the highest priority of ONE Gas. We also believe we have a shared responsibility to care for our planet and are committed to finding ways to reduce emissions and engage in proactive conservation efforts, as we move toward a low carbon future. Suppliers must share the Company’s commitment to provide a safe and healthy workplace and to conduct operations in an environmentally responsible manner. Suppliers must observe environmental, safety and health laws and regulations that apply to their operations.

As a valued partner, you should:

- Integrate safe work practices into your business activities;
- Provide a workplace that meets or exceeds applicable safety and health laws and regulations;
- Minimize exposure to health risks and curtail any potentially harmful impact to the community;
- Perform background checks on your employees to help maintain a safe and healthy work environment;

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- Prohibit smoking in our facilities, including electronic cigarettes;
- Prohibit firearms or other weapons in Company facilities or on jobsites, even if an employee possesses a concealed weapon permit;
- Support the sustainable use of natural resources including water conservation, the reduction and beneficial reuse of waste, and energy conservation;
- Know and understand the environmental issues associated with the production of goods and services you provide; and
- Promptly report all accidents, injuries, incidents and actual or potential safety, health, or environmental hazards to the appropriate regulatory agencies and your Company contact, if warranted.

Drug-Free Workplace

All Suppliers performing work, labor, or services for ONE Gas are expected to maintain a drug-free workforce and a drug-free workplace policy that conforms to the ONE Gas policy and includes any drug testing required by applicable state or federal law.

Suppliers must uphold a drug-free workplace whether on or off the Company's premises.

Your employees shall not sell, use, manufacture, distribute or be under the influence of alcohol, drugs not prescribed to them, drugs prescribed to them that may impair their ability to perform their duties, or illegal drugs. You should immediately report if you believe someone appears to be working on or Company premises under the influence of drugs or alcohol.

Violence-Free Workplace

We are committed to providing a violence-free workplace. Threats or assaults made directly, or indirectly, towards any worker, customer, or any other individual, will not be tolerated regardless if it is during or after work hours. Consistent with local laws, Suppliers and their representatives are not allowed to carry, store or transport dangerous weapons or firearms either open or concealed, on any property owned or leased by the Company, any Company job site, or anywhere the Company conducts business or provides service regardless of whether an individual possesses a concealed weapons permit or is allowed by law to possess a weapon. We expect our Suppliers to report any act, whether physical or psychological, which threatens or harms another person in a violent or potentially violent manner.



Ethics



We are committed to the highest level of ethical standards in everything we do, and we make decisions by evaluating outcomes through the lens of our core values. No illegal or unethical conduct by our Suppliers will be tolerated.

Legal and Regulatory Compliance

We require our Suppliers to fully comply with all laws, rules and regulations applicable to their operations and any applicable laws or regulations where we operate. In addition, we require our Suppliers to comply with all applicable ONE Gas policies made available to you, including this Code.

Suppliers and their agents must be in full compliance with laws and regulations that include, but are not limited to:

- Antitrust and fair competition laws;
- Anticorruption laws of the countries where the supplier does business, including the United States Foreign Corrupt Practices Act (“FCPA”);
- Antiboycott laws;
- Antikickback laws; and
- Laws and regulations associated with insider trading.

Suppliers must never, directly, or indirectly (including through third parties), accept or offer bribes or kickbacks to obtain or gain an unfair business advantage. Additionally, no Supplier may offer, promise or give, directly or indirectly, a gratuity or anything of value regardless of amount, to induce or influence a government decision.

Human Rights

ONE Gas respects and supports human rights, no matter where a person calls home. We strive to foster an inclusive and respectful workplace and demand the same from our Suppliers. We expect Suppliers throughout our supply chain to adopt, enforce and comply with all applicable laws, rules, and regulations.

Suppliers must:

- Not utilize or participate in the exploitation of workers, children, and forced or involuntary labor, including human trafficking and child labor;
- Comply with all applicable federal, state and local labor standards and wage and hour laws and treat all employees with dignity and respect;
- Promote and adopt policies and practices regarding non-discrimination, anti-harassment, equal employment opportunities, and the proper investigation of complaints;
- Respect your employees’ rights to associate, self-organize, form, join or assist labor organizations, along with the right to bargain collectively through representatives of their choosing regarding wages, hours, and working conditions or to refrain from engaging in such activities; and
- Hire without regard to race, religion, color, sex, national origin, age, sexual orientation, gender identity or expression, disability, military status or other categories protected by applicable laws and prohibit unlawful discrimination and harassment.

Conflict of Interest

A conflict of interest may exist whenever a Suppliers’ personal interests, personal activities or relationships interfere or appear to interfere with the duties performed at or owed to ONE Gas. Suppliers must avoid any situation that may create or appear to create a potential conflict of interest with the Company. You must disclose to the Company any situation that could create an actual or even the appearance, of a conflict of interest. Below are some examples of conflicts of interest.

- Never use your relationship with ONE Gas for personal gain;

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- You should not have an interest in any transaction involving the Company beyond your interest as a Supplier;
- Do not conduct business with a close family member who works for ONE Gas without disclosing the potential conflict of interest for further investigation; and
- Never offer, provide, solicit or accept anything of value to or from anyone in return for favorable consideration.

Gifts and Entertainment

No Supplier may offer, promise or give, directly or indirectly, a gratuity or anything of value regardless of amount to induce or influence a business decision or to secure an improper advantage. The Code forbids excessive entertainment, travel or gifts of other than nominal value.

- Do not develop personal relationships with employees that might impair your judgment

- when conducting business with the Company;
- Do not give or offer ONE Gas employees gifts, entertainment, travel, or favors above nominal value. (e.g., lodging, discounts, travel, tickets, stock, etc.);
 - Examples of nominal gifts include pens, hats, calendars, mugs, or small promotional items related to business or an occasional reasonably priced meal or attendance at a sporting event with a business contact;
- Do not give gift cards, cash, loans, or payments to employees; and
- Do not offer employees kickbacks or grease payments.

If a ONE Gas employee receives anything that does not comply with ONE Gas' policies, they must return it or decline the gift. If you have any questions about whether a gift or entertainment may comply with ONE Gas' policy, please seek guidance from a member of our Compliance and Ethics Department.

Inclusion & Diversity



At ONE Gas, we stand for inclusion and diversity and recognize the value of every employee's voice and unique perspective. We believe in listening to understand and learning from what we hear. As a leader in our industry and the communities we serve, we are committed to listening, learning and leading.

Discrimination

Discrimination has no place in workplace decisions. We expect our Suppliers to:

- Recruit, promote and support the professional development of a diverse workforce;
- Hire without regard to race, religion, color, sex, national origin, age, sexual orientation, gender identity or expression, disability, military status or other categories protected by applicable laws;
- Train, promote and compensate based on the ability, achievement, experience and conduct of the employee without regard to race, religion, color, sex, national origin, age, sexual orientation, gender identity or expression, disability or military status or other categories protected by applicable law; and

- Embrace the diversity of each other's talents, abilities and experiences.

Harassment

Harassment of any person, including but not limited to ONE Gas employees and the personnel of any Supplier will not be tolerated in maintaining a workplace environment consistent with our values. We prohibit harassment of or by employees, in any manner on the basis of sex (with or without conduct), race, religion, color, national origin, age, sexual orientation, gender identity or expression, disability or military status. Suppliers must commit to providing employees with a work environment free from harassment, intimidation, and other inappropriate behavior.

Service



We care about our customers and provide exceptional service and solutions to meet their needs. At ONE Gas, we continually look for ways to improve and we expect the same from our Suppliers.

Privacy and Confidentiality of Private Information

ONE Gas expects all Suppliers to protect confidential and proprietary information. Confidential information means any information relating or belonging to ONE Gas or any affiliated company that is sensitive or has economic or competitive value and is not available to the general public. Confidential information must not be disclosed to anyone outside of the Company and should be disclosed internally only to those who need the information to perform their duties. Suppliers should assume information about the Company or information about its customers, suppliers or other associated third parties is confidential unless it has clearly been made public by an authorized representative of the Company. Unless you have written permission from ONE Gas and any applicable third party to do so, you must not use or disclose any confidential or proprietary information belonging to any third party in the course of your work for ONE Gas. The obligation to safeguard confidential information continues even after the Supplier no longer conducts business with the Company.

Suppliers must comply with privacy and information security laws and regulatory requirements when information and data about or from ONE Gas customers, consumers, employees, or suppliers is collected, stored, processed, transmitted or shared. If you are unsure as to the appropriate treatment of certain information, ask your ONE Gas contact before disclosing the information.

Record Retention

ONE Gas expects our Suppliers' records to be managed with integrity and in compliance with requirements. Records are important business assets containing valuable information. Suppliers have a responsibility to manage the Company's information assets (records) in compliance with federal, state, and operational requirements. Records must be maintained long enough to meet contractual, legal and business requirements; be accessible, authentic and reliable; and be readily available to meet research, regulatory and discovery requirements.

Maintaining accurate and complete records is important to sustaining an open, honest, and ethical business practice. It is never acceptable to destroy records before the appropriate retention period has expired; no matter the potential consequences to the employee or the Supplier during an audit or legal matter.

Suppliers should always keep Accurate, Complete, and Timely records — A.C.T.



Value



We create value for all stakeholders, including our employees, customers, suppliers, investors and communities.

Engaging in Business with ONE Gas

Suppliers should engage in the highest ethical standards during requests for information, requests for proposal, bidding and selecting procedures.

We recognize the value of diverse suppliers such as minority-owned, women-owned and all categories of small business ownership. We are committed to developing strong working relationships with diverse suppliers, encouraging major suppliers of ONE Gas to support supplier diversity and seeking opportunities to develop the competitiveness of diverse suppliers through instruction, mentoring and capacity building.

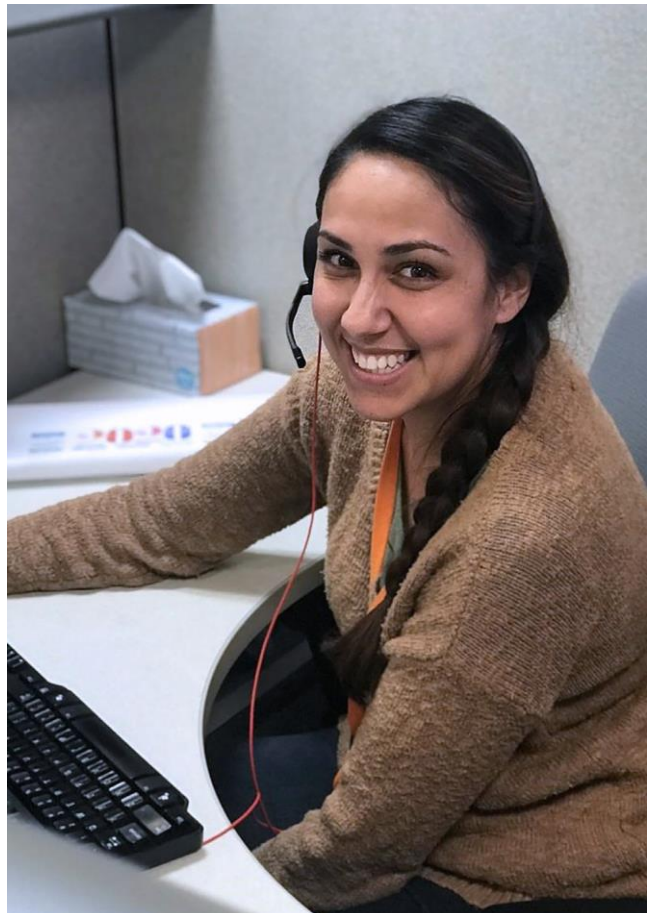
Protection and Use of Company Assets

Suppliers are responsible for safeguarding Company assets. Among other property, information, materials, supplies, time, intellectual property, software, hardware, websites and facilities are valuable resources owned, licensed or otherwise belonging to the company. All Company assets should be used only for legitimate business purposes. The personal use of Company assets without permission is prohibited.

Fair Competition & Fair Dealing

ONE Gas is committed to vigorous competition and fair dealing in the marketplace. Conduct aimed at limiting this competition is inconsistent with the Code and may violate antitrust and other laws.

- Suppliers should not discuss sensitive business topics such as prices, sales terms, business or marketing plans, margins, costs, production capacity, inventory levels, trade programs or discounts with competitors.
- If a competitor raises any of these issues, no matter how casually, stop the conversation immediately.
- You should immediately report any inappropriate conversations with competitors to your Company contact.



How to Report a Violation of this Code

Every Supplier has the responsibility to ask questions, seek guidance, report suspected violations and express concerns regarding compliance with this Code to their ONE Gas business contact or to the Compliance and Ethics Department.

Any Supplier who knows or believes any Supplier, employee or representative of ONE Gas has engaged or is engaging in conduct that violates applicable law or this Code should report such information immediately by contacting the Compliance and Ethics Department.

Code violations are taken seriously; therefore, all allegations of illegal or unethical conduct will be investigated. Suppliers must cooperate fully with any investigation by ONE Gas of a potential violation. To the extent possible, ONE Gas will

maintain confidentiality of anyone reporting suspected or known misconduct and will not tolerate any retaliatory acts or threats against anyone for reporting such misconduct. Failure to cooperate with any such inquiry or investigation may result in disciplinary action, including termination of the contract.

To report a potential code violation, contact the Compliance and Ethics Department using one of the methods below:

- Email: **OGS.compliance-ethics@onegas.com**
- Call the Compliance & Ethics Helpline: **855.654.5560**
- Use the Web-based System: **ethics.onegas.com**

Summary

The Company expects our Suppliers to maintain a high ethical standard in all areas of business focusing on trust, honesty and integrity. Our customers, employees, regulators, suppliers, communities and other stakeholders look to us to make ethical decisions. As important as it is for us to do the right thing when no one is looking, it is just as important that we have the courage to do what is right when others are watching. This Code provides guidance to assist us in conducting our business with integrity and in full compliance with all laws and regulations.

The standards of this Code are only intended to outline the Company's general expectations of Suppliers and do not supersede the provisions of any legal agreement or contract between a Supplier and ONE Gas.

If you have any questions about the Code, please seek guidance from a member of our Compliance and Ethics Department or your ONE Gas contact.





15 East Fifth Street, Tulsa, OK 74103
918.947.7000 | ONEGas.com

