

TITLE: Human Rights					
Policy Number	Issued Date	Effective Date	Revision Date	Last Reviewed/ Approved Date	Issuing Department
HR00046	11/17/2020	11/17/2020	11/17/2020	12/17/2020	Human Resources
Approved by:	Heather Burns, Director Human Resources; Bobbi Schroepel, VP Customer Care, Communications, and HR; Mike Nieman, Chief Audit & Compliance Officer; Heather Grahame, General Counsel and Vice President – Regulatory and Federal Government Affairs; ; Robert C. Rowe, President and CEO				

I. Statement of Policy

NorthWestern Energy believes that human rights are inherent to all human beings, regardless of race, color, religion, age, sex, national origin, disability status, genetics, protected veteran status, sexual orientation, gender identity or expression, or any other characteristic protected by federal, state or local laws.

II. Objective

The objective of this policy is to formally recognize NorthWestern Energy’s commitment to the highest standards of business and ethical behavior including compliance with all applicable laws and regulations, company policies, practices and procedures, and human rights standards. Furthermore, our efforts include engagement with our business partners to mitigate potential human rights impacts beyond our direct control.

In addition, this policy exists to:

- Establish NorthWestern Energy’s commitment to human rights;
- Inform employees, business partners and customers of NorthWestern Energy’s commitment to human rights; and to
- Set expectations for all employees and business partners when it comes to human rights

III. Scope

This policy applies to all NorthWestern Energy employees and anyone doing business for or with NorthWestern Energy and others acting on NorthWestern Energy’s behalf including business partners. This applies to all locations where NorthWestern Energy conducts business and to all company endorsed events.

IV. Definitions

- A. Human Rights: Basic rights universal to all human beings, based on the fundamental provisions of the Universal Declaration on Human Rights, as established by the General Assembly of the United Nations, the International Labor Organization’s Declaration of Fundamental Principles and Rights at Work, and the United Nations Guiding Principles on Business and Human Rights.

- B. Business Partner: A commercial entity or individual such as a contractor, supplier, vendor or consultant engaged in a business relationship with or on behalf of NorthWestern Energy.

V. Policy Provisions

- A. NorthWestern Energy conducts its business in a manner that respects the rights and dignity of all people, complying with all applicable laws and regulations. Our policies reflect our commitment to respecting the protection of internationally recognized human rights.
- B. All employment with NorthWestern Energy is voluntary. We do not use child or forced labor in any of our operations or facilities. We do not tolerate any form of unacceptable treatment of workers, including but not limited to the exploitation of children, human trafficking, physical punishment or abuse, or involuntary servitude. We comply with all applicable laws establishing a minimum age for employment.
- C. NorthWestern Energy is committed to providing a safe working environment and to following all occupational safety and health laws and statutes. We take our responsibility for health and safety seriously for employees and expect the same from business partners working on behalf of the company. We provide programs to support both the physical and mental health of our employees.
- D. NorthWestern Energy abides by all laws and regulations regarding work hours, pay practices and the classification of employment according to job level and status.
- E. NorthWestern Energy respects the human and ecological needs for water and use of land resources.
- F. Freedom of association and the right to bargain collectively are part of the International Bill of Human Rights and the International Labor Organization's (ILO's) Declaration on Fundamental Principles and Rights at Work. NorthWestern Energy respects our employees' right to join, form or not join a labor union without fear of reprisal, intimidation or harassment. Where employees are represented by a legally recognized union, we are committed to establishing a constructive dialogue with their freely chosen representatives. We are committed to bargaining in good faith with such representatives.
- G. Diversity is embraced at NorthWestern Energy. We value a diverse mix of backgrounds, skills and experiences and believe that diversity drives new ideas, products and services, and provides us with a sustained competitive advantage.
- H. NorthWestern Energy believes everyone should be treated with respect regardless of their background. We are committed to the elimination of discrimination based on gender, race, class, nationality, economic status, ethnic background, sexual orientation (LGBTQ), gender identity or expression, age, political beliefs, veteran status, disability, marital status or any other protected class. We abide by our Anti-Harassment policy.

- I. NorthWestern Energy's Supplier Code of Conduct sets the expectation for business partners to adhere to our Human Rights policy. NorthWestern Energy's contractual relationships include the expectation for partners, vendors and suppliers to adhere to our Equal Opportunity standards.
- J. NorthWestern Energy conducts business in a manner that demonstrates respect for the communities and stakeholders we serve. We engage our communities, customers, employees and stakeholders to gather feedback to ascertain the impacts of our business decisions.

VI. Monitoring & Reporting

- A. Any employee or business partner who experiences or witnesses a violation of human rights should immediately notify one of the following: his or her supervisor, human resources, the legal department, the chief audit and compliance officer, or the confidential Compliance Line at (877) 781-7286 or online at www.integrity-helpline.com/NW.jsp.
- B. Any person who receives a human rights complaint should immediately report the matter to one of the following: human resources, the legal department, the chief audit and compliance officer or the confidential Compliance Line at (877) 781-7286 or online at www.integrity-helpline.com/NW.jsp.
- C. Violation of this Policy, the refusal to cooperate, or where we have sound reason to believe that our partner organizations infringe on human rights, we reserve the right to cease those relationships as warranted, or take other corrective measures deemed appropriate. Business partners are expected to comply with this Human Rights Policy and to be alert to any evidence of human rights infringements whether at NorthWestern, their operations, or other business partners of NorthWestern. In any such event, we expect our business partners to report any situation in which a human rights infringement is suspected.
- D. NorthWestern Energy is committed to ongoing efforts to mitigate the potential for human rights infringements. NorthWestern Energy expects those with whom it does business to respect all human rights.

VII. Corporate Policy Provisions

- A. Nothing in this policy is intended to limit an employee's rights under the National Labor Relations Act (NLRA).
- B. If any of the provisions of this policy conflict with federal or state law, the provisions of the federal or state law prevail.
- C. If any of the provisions of this policy conflict with those of a collective bargaining agreement (CBA) for covered employees, the provisions of the CBA will prevail.

- D. All employees are expected to comply with this policy. Failure to do so may result in disciplinary action up to and including termination of employment.
- E. The existence of this policy does not create a contract or vested right of employment implied or otherwise. NorthWestern Energy is an at-will employer in South Dakota, Nebraska, and Wyoming.
- F. NorthWestern Energy reserves the right to amend, terminate, or otherwise modify this Policy at any time. The effect of any amendment or modification, however, will be prospective, not retroactive.

VIII. Additional Resources

- A. NorthWestern Energy Code of Conduct and Ethics
- B. Anti-Harassment Policy
- C. EEO Policy
- D. Employment Policy
- E. Supplier Code of Conduct
- F. Anti-Retaliation