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Climate Strategy

ISS Env & Soc QualityScore Number: 21; 22; 24; 25; 26; 35; 37

Environmental / Emissions / Climate Strategy

Please provide information below regarding the components included in NorthWestern Energy 's policy and strategy for reducing/managing carbon emissions risk.

<p>Company has a policy/statement/strategy addressing its direct or indirect impacts on climate change:</p> <div style="border: 1px solid black; padding: 5px; margin: 5px 0;"> <p>Our Vision For Montana</p> <p>Environmental Policy</p> </div>	<p><input checked="" type="checkbox"/> Yes and it is publicly available. Link to disclosure: https://www.northwesternenergy.com</p> <p><input type="checkbox"/> Yes, it is part of a wider environmental policy</p> <p><input type="checkbox"/> Yes, but it is not publicly available</p> <p><input type="checkbox"/> No, but we are currently developing a public policy</p> <p><input type="checkbox"/> No</p>
<p>Climate Change policy details:</p>	<p><input type="checkbox"/> Policy is at enterprise level</p> <p><input type="checkbox"/> Policy is a global policy applying the same comprehensive standards to all company operations regardless of geographic location</p> <p><input checked="" type="checkbox"/> Policy includes discrete, actionable elements from which programs can be derived and/or progress measured</p> <p><input type="checkbox"/> Policy specifically references areas of challenge for the company and its industry</p> <p><input checked="" type="checkbox"/> Policy specifically mentions the Board of Directors as having responsibility for the climate change policy</p> <p><input type="checkbox"/> Same policy standards for company apply to suppliers/vendors</p> <p><input type="checkbox"/> Same policy standards for company apply to partners</p>
<p>Policy addresses:</p>	<p><input checked="" type="checkbox"/> Green house gases</p> <p><input type="checkbox"/> Other emissions</p> <p><input type="checkbox"/> Energy use/conservation</p> <p><input type="checkbox"/> Water use/conservation</p> <p><input type="checkbox"/> Suppliers/vendors</p> <p><input type="checkbox"/> Partners</p>
<p>% of operations covered by climate change policy: 75%</p>	
<p>Company has committed to long-term (> or = 5 years) goals or targets covering its direct or indirect impacts relating to climate change:</p>	<p><input checked="" type="radio"/> Yes, and they are publicly available (please upload document/website)</p> <p><input type="radio"/> Yes, but they are not publicly available</p> <p><input type="radio"/> No, but we are currently developing long-term goals</p> <p><input type="radio"/> No</p>
<p>Company has committed to short-term (<5 years) goals or targets covering its direct or indirect impacts relating to climate change:</p>	<p><input type="radio"/> Yes, and they are publicly available (please upload document/website)</p> <p><input type="radio"/> Yes, but they are not publicly available</p> <p><input type="radio"/> No, but we are currently developing short-term goals</p> <p><input type="radio"/> No</p>
<p>Other commitments in policy:</p>	<p><input type="checkbox"/> Commitment to stakeholder involvement in the development of the climate change policy</p> <p><input type="checkbox"/> Commitment to stakeholder involvement in the implementation of the climate change policy</p> <p><input type="checkbox"/> Commitment to stakeholder involvement in the evaluation of effective outcomes of the policy's implementation</p> <p><input type="checkbox"/> Commitment to auditing</p> <p><input type="checkbox"/> Commitment to third-party auditing</p> <p><input type="checkbox"/> Commitment to public reporting</p>
<p><input type="checkbox"/> Company only has a mission/vision/values statement that includes reference to climate change without providing specific detail.</p>	<p>Specify document / link:</p>
<p><input type="checkbox"/> Company discloses its views and position on the issue of climate change legislation</p> <p><input type="checkbox"/></p>	<p>Specify document / link:</p>
<p>* Boundaries (scope) of responsibility to avoid or minimize damage associated with climate change:</p>	
<p><input type="checkbox"/> ** Measures to increase transport efficiency</p>	
<p><input type="radio"/> Not applicable. Please provide explanations in the comment box below.</p> <p><input type="radio"/> Not known</p>	

Opportunity Disclosure

ISS Env & Soc QualityScore Number: 28

General Disclosures / Strategy / Opportunity Disclosure

Identify and detail any climate-related opportunities with the potential to have a substantive financial or strategic impact on your business.

<p>C2.4 Have you identified any climate-related opportunities with the potential to have a substantive financial or strategic impact on your business?</p> <p>No</p>																
<p>C2.4a Detailed Opportunities</p> <p>Identifier</p>	<p>Location in value chain</p>	<p>Opportunity type</p>	<p>Primary climate-related opportunity driver</p>	<p>Primary potential financial impact</p>	<p>Company-specific description</p>	<p>Time horizon</p>	<p>Likelihood</p>	<p>Magnitude of impact</p>	<p>Able to provide potential financial impact?</p>	<p>Potential financial impact figure</p>	<p>Potential financial impact figure - minimum</p>	<p>Potential financial impact figure - maximum</p>	<p>Explanation of financial impact</p>	<p>Strategy to realize opportunity and explanation of cost calculation</p>	<p>Cost to realize opportunity</p>	<p>Comment</p>
<p>Provide "Opp1" to "Opp100"</p>																
<p>C2.4b Reason for No Opportunities</p> <p>Primary reason</p>	<p>Please explain</p>															
<p>Not yet evaluated</p>	<p>NorthWestern Energy is committed to providing responsible, sustainable energy to meet our customer's needs, while protecting, and even enhancing, the natural environment. We are vigilant in monitoring the impacts of our operations on the environment, in complying with the spirit, as well as the letter of environmental requirements, and managing responsibly natural resources under our stewardship.</p>															

References:

 [Environmental Policy](#)

Climate Change Strategy

ISS Env & Soc QualityScore Number: 23

Economic / Economic Performance / Climate Change Strategy

The following option best describes the risk management procedures for NorthWestern Energy with regard to climate change risks and opportunities:

Frequency of monitoring	How far in the future risks are considered	Comments
Details on your organization's process(es) for identifying and assessing climate-related risks		
Describe your process(es) for managing climate-related risks and opportunities:		
	Please explain	
<p>If no documented processes, main reason for not having a process:</p> <p>We are planning to introduce a risk identification, assessment, and management process in the next two years.</p>		
<p>Please select one of the following options. (Required)</p> <p><input type="radio"/> Integrated into multi-disciplinary company-wide risk management process (i.e. a documented process where climate change risks and opportunities are integrated into the company's centralized enterprise risk management program covering all types / sources of risks and opportunities). Please provide supporting evidence by attaching up to five (5) references.</p> <p><input type="radio"/> A specific climate change risk management process, i.e. a documented process which considers climate change risks and opportunities separate from other business risks and opportunities. Please provide supporting evidence by attaching up to five (5) references.</p> <p><input checked="" type="radio"/> There are no documented processes for assessing and managing risk and opportunities from climate change.</p> <p><input type="radio"/> Not applicable. Please provide explanations in the appropriate comment box below.</p> <p><input type="radio"/> Not known</p>		

Additional Comments

Our Audit Committee is primarily responsible for overseeing the company's risk management processes on behalf of the full Board by monitoring company processes for management's identification and control of key strategic, operational, financial, regulatory, compliance, and security risks. The Audit Committee receives reports from management at least quarterly regarding the company's assessment of risks. In addition, the Audit Committee reports regularly to the full Board, which also considers the company's risk profile. The Audit Committee and the full Board focus on the most significant risks facing the company and review the corporate risk appetite in evaluating strategic alternatives and business development opportunities. The Compensation Committee oversees risks in compensation plans, the Governance Committee oversees risks in corporate governance and social responsibilities, and the Operations Committee addresses risks regarding environmental, health, security (cyber and physical), operational and safety matters. The Board oversees the company's risk management, and our CEO and executive Enterprise Risk Management Committee act to ensure that our enterprise risk management and business continuity programs (ERM) achieve their objectives. While management is responsible for the day-to-day risk management processes, we have structured our ERM reporting relationship through our Chief Audit and Compliance Officer who has a direct reporting relationship to the Audit Committee. We believe this division of responsibilities is the most effective approach for addressing the risks facing our company and that our Board leadership structure supports this approach.

References:

 [2021 Proxy Statement](#) Page(s)
60

Climate-Related Scenario Analysis

ISS Env & Soc QualityScore Number: 36

General Disclosures / Strategy / Climate-Related Scenario Analysis

Does your organization use climate-related scenario analysis to inform your business strategy?


<p>C3.1 Have climate-related risks and opportunities influenced your organization's strategy and/or financial planning?</p> <p><input checked="" type="radio"/> Yes, and we have developed a low-carbon transition plan</p> <p><input type="radio"/> Yes</p> <p><input type="radio"/> No</p>	<p>Details of scenario analysis</p>
<p>C3.1a Is your organization's low-carbon transition plan a scheduled resolution item at Annual General Meetings (AGMs)?</p> <p>No, and we do not intend it to become a scheduled resolution item within the next two years</p>	
<p>C3.1b Does your organization intend to publish a low-carbon transition plan in the next two years?</p> <p>Yes, in the next two years</p>	<p>NorthWestern's low-carbon transition plan for Montana has been published and will continue to be refined over the coming years.</p>
<p>C3.1b* Intention to include the transition plan as a scheduled resolution item at Annual General Meetings (AGMs)</p> <p>No, we do not intend to include it as a scheduled AGM resolution item</p>	
<p>C3.2 Does your organization use climate-related scenario analysis to inform its strategy?</p> <p>No, but we anticipate using qualitative and/or quantitative analysis in the next two years</p>	
<p>C3.2a Provide details of your organization's primary use of climate-related scenario analysis.</p>	
<p>C3.2a Provide details of your organization's alternate use of climate-related scenario analysis.</p>	
<p>C3.2b Why does your organization not use climate-related scenario analysis to inform its strategy?</p> <p>NorthWestern Energy's policy is to provide cost-effective, reliable and stably priced energy while being good stewards of the natural resources and complying with environmental regulations. We apply the following environmental principles in our day-to-day business:</p> <ol style="list-style-type: none"> 1. Our business practices reflect a respect for, and a commitment to, sustainability and the long-term quality of the environment. 2. One of our priorities is being good stewards of natural and cultural resources at our hydroelectric projects. 3. We comply with the spirit as well as the letter of environmental laws and regulations. 4. Environmental issues and impacts are an integral part of our planning, operating and maintenance decisions. 5. We promote our customers' efforts to be energy efficient. 6. We support providing energy through non-carbon emitting and renewable resources when consistent with our statutory requirement to provide cost-effective energy. 7. We strive to minimize the generation of wastes and promote the reuse and/or recycling of materials. 8. We seek to improve our environmental compliance and stewardship continuously. 9. We embrace a team culture where positive environmental stewardship and compliance are encouraged, mentored and rewarded. 10. Our contractors and consultants must comply with this policy when working for or representing NorthWestern Energy 	
<p>Please select one of the following options. (Required)</p> <p><input type="radio"/> Yes, we use climate-related scenario analysis to inform our business strategy, and have completed the table above.</p> <p><input checked="" type="radio"/> No, but we anticipate doing so in the next two years.</p> <p><input type="radio"/> No, and we do not anticipate doing so in the next two years.</p> <p><input type="radio"/> Not applicable. Please provide explanations in the appropriate comment box.</p> <p><input type="radio"/> Not known.</p>	

Climate Strategy - CDP Alignment

ISS Env & Soc QualityScore Number: 108; 102; 109; 111; 45; 46; 48; 49; 222

Environmental / Other: Environmental / Climate Strategy - CDP Alignment



NorthWestern Energy 's reporting on response to climate change and GHG emissions follows:

Your company's reporting on response to climate change and GHG emissions: <input type="checkbox"/> Reports to Carbon Disclosure Project (CDP) (attach this year's response) <input type="checkbox"/> Makes CDP report publicly available <input type="checkbox"/> Climate Leader Partner <input type="checkbox"/> Makes use of the GHG Reporting Protocol			
The company's most recent Carbon Disclosure Performance Score falls within the following category: Company is not currently rated by the Carbon Disclosure Project			
C12.4 Other published information about your organization's response to climate change and GHG emissions performance for this reporting year:	Status	Content elements	Comment
In voluntary communications  Key Stustainability Statistics Report	Underway - previous year attached	Governance Strategy Risks & Opportunities Emissions figures Other metrics Other	
<input checked="" type="radio"/> Applicable. Please provide explanations in the appropriate comment box below. <input type="radio"/> Not known			

Additional Comments

NorthWestern does not currently disclose responses to climate change or greenhouse gas emissions through the Carbon Disclosure Project (CDP). However, NorthWestern does report and make publicly available Greenhouse Gas and other emissionstatistics.

References:

-  [EEI/ESG Sustainability Document](#)
-  [Key Stustainability Statistics Report](#)

Effectiveness of Risk Management Process GRI 102-30

ISS Env & Soc QualityScore Number: 106

General Disclosures / Governance / Effectiveness of Risk Management Process GRI 102-30

Highest governance body's role in reviewing the effectiveness of the organization's risk management processes for economic, environmental and social topics.

The audit committee of NorthWestern's board of directors oversees the company's entire risk management processes, including economic, environmental and social topics. The safety, environmental, technology and operations committee of the board reviews environmental matters; the nominating and governance committee of the board reviews the company's ESG public disclosure initiatives and community-related issues; and the human resources committee reviews certain social matters, such as diversity, equity, and inclusion, and well as numerous employee-related issues.

Climate Strategy Impacts

ISS Env & Soc QualityScore Number: 107

Environmental / Materials / Climate Strategy Impacts

Details related to emissions reduction initiatives that were active during the reporting year (including those in the planning and/or implementing phases) for NorthWestern Energy are as follows:

C4.3b Initiative category	Initiative type	Estimated annual CO2e savings (metric tonnes CO2e)	Scope	Voluntary/Mandatory	Annual monetary savings (unit currency)	[Lifetime] Investment required (unit currency)	Payback period (PP)	Estimated lifetime of the initiative	Comment
				<input type="radio"/> Voluntary <input type="radio"/> Mandatory					
Summary of Impact		Total estimated annual CO2e savings:			Total Annual Monetary Savings:	Annual Total Invest. (Last FY):	Average (# of years):		
Reporting Currency:									
Emissions reductions programs publicly disclosed:									
Please select one of the following options. (Required) Yes, we track this information and have completed at least the row above labeled "Summary of Impact". You may provide supporting evidence by attaching up to five (5) references. <input type="radio"/> We do not track this information or calculate these figures. <input type="radio"/> Not applicable. Please provide explanations in the appropriate comment box below. <input checked="" type="radio"/> Not known									

Oversight of Climate Issues

ISS Env & Soc QualityScore Number: 105; 110

Environmental / Other: Environmental / Oversight of Climate Issues

Provide details of board-level and below-board level oversight of climate issues within NorthWestern Energy .

C1.2 Name of management position or committee	[Financial Services Only] Reporting line	Responsibility	[Financial Services Only] Coverage of responsibility	Frequency of reporting to board
Safety, Health, Environment and Quality committee	Operations - COO reporting line	Both assessing and managing climate-related risks and opportunities	Risks and opportunities related to our own operations	Quarterly
C1.2a Describe where in the organizational structure this/these position(s) and/or committees lie, what their associated responsibilities are, and how climate-related issues are monitored. Our Board has delegated to our Safety, Environmental, Technology, and Operations Committee (Operations Committee) the following areas of oversight: <ul style="list-style-type: none"> • Safety; • Environmental compliance practices; • Security (including physical and cyber security, and business continuity); • Operations; and • Innovation, including emerging or competing technologies and alternative energy resources. Independence Each member of our Operations Committee is independent. Operations Committee Charter The Operations Committee was created in early 2020 to allow the Board, through this committee, to devote more time to safety, environmental, technology, and operations matters. The Operations Committee operates pursuant to a charter that is reviewed annually and was last amended in October 2020. The Charter is available on our website at NorthWesternEnergy.com under Our Company / Investor Relations / Corporate Governance.				

References:

 [2021 Proxy Statement](#)

 [NorthWestern Corporation Safety, Environmental, Technology, ...](#)

Low-carbon Investments

ISS Env & Soc QualityScore Number: 43

Environmental / Emissions / Low-carbon Investments

Disclose investments in low-carbon research and development, equipment, products, and services.

<p>C-EU9.6 Does your organization invest in research and development (R&D) of low carbon products or services related to your sector activities?</p> <p><input checked="" type="radio"/> Yes <input type="radio"/> No</p>	<p>Comment</p>			
<p>C-EU9.6a Technology area</p>	<p>Stage of development in the reporting year</p>	<p>Average % of total R&D investment over the last 3 years</p>	<p>R&D investment figure in the reporting year (optional)</p>	<p>Comment</p>
<p>Electric Utilities: Smart meters</p>	<p>Large scale commercial deployment</p>	<p>41 - 60%</p>	<p>0</p>	<p>Invested in 2018 and 2019 but not in 2020. Resumed investment in 2021 to continue into 2022</p>
<p>Electric Utilities: Smart grids</p>	<p>Pilot demonstration</p>	<p>≤20%</p>		<p>Smart grid development and research in Yellowstone National Park</p>
<p>Electric Utilities: Steam turbine and/or other component upgrades</p>	<p>Large scale commercial deployment</p>	<p>41-60%</p>		<p>Hydro Turbine Upgrades</p>
<p>Electric Utilities: Unable to disaggregate by technology area</p>	<p>Applied research and development</p>	<p>≤20%</p>		<p>Various Community Sustainability R&D projects - solar, solar/battery, other</p>
<p>Electric Utilities: Energy storage</p>	<p>Small scale commercial deployment</p>	<p>≤20%</p>		<p>Small Scale Energy Storage Project in South Dakota (Harrold - Blunt)</p>

Investments

ISS Env & Soc QualityScore Number: 59

General Disclosures / Governance / Investments

Describe how your company incorporates extra-financial risks and/or opportunities in its investment process.

<input type="checkbox"/> Considering extra-financial aspects when investing in shares or corporate bonds <input type="checkbox"/> Considering extra-financial aspects when investing in government bonds <input type="checkbox"/> Considering extra-financial aspects when investing in property (e.g. land, buildings... etc) <input type="checkbox"/> Considering extra-financial aspects in other investments <input type="checkbox"/> Policies publicly available
<p>Please select one of the following options. (Required)</p> <input type="radio"/> We consider extra-financial aspects, and have completed the table above. <input type="radio"/> We do not consider extra-financial aspects. <input checked="" type="radio"/> Not applicable. Please provide explanations in the comment box below. <input type="radio"/> Not known.
Details of Responsible Investment Program
<input type="checkbox"/> Managerial responsibility for responsible investment
<input type="checkbox"/> Requirements for investment managers to integrate ESG issues into investment strategies
<input type="checkbox"/> Prior ESG risk assessment of investments
<input type="checkbox"/> Continuous monitoring of ESG risks
<input type="checkbox"/> Active ownership
<input type="checkbox"/> Investment exclusions based on ESG factors
<input type="checkbox"/> Best-in-class investments based on ESG factors
<input type="checkbox"/> Other initiatives to promote responsible investment
<input type="checkbox"/> Reporting on RI implementation and performance
<input type="checkbox"/> Objectives and targets related to responsible investment

Additional Comments

NorthWestern is not an investment company. It does not buy shares, corporate bonds, government bonds, other investments, etc.

GHG Emissions Targets

ISS Env & Soc QualityScore Number: 38; 39; 40; 42

Environmental / Emissions / GHG Emissions Targets

Please indicate NorthWestern Energy 's corporate targets to reduce direct greenhouse gas emissions, in absolute emissions, relative emissions (emission intensity terms), or through renewable energy consumption and/or production targets. If you do not have a target please explain why not and forecast how your emissions will change over the next five years.

Company has intensity target(s)		
Standard Method	Absolute Targets	Relative Targets

Unit of data: lb of CO2/MWh	<input type="radio"/> Targets set <input type="radio"/> No absolute targets set <input type="radio"/> Not known	<input checked="" type="radio"/> Targets set <input type="radio"/> No relative targets set <input type="radio"/> Not known	
Is this a science-based target?		No	
Baseline year		2010	
*Scope of the emissions for which the target is defined	<input type="radio"/> Scope 1 <input type="radio"/> Scope 2 <input type="radio"/> Scope 1 and 2 combined <input type="radio"/> Scope 1 and 2, but separately <input type="radio"/> Not known	<input checked="" type="radio"/> Scope 1 <input type="radio"/> Scope 2 <input type="radio"/> Scope 1 and 2 combined <input type="radio"/> Scope 1 and 2, but separately <input type="radio"/> Not known	
% emissions in Scope		71	C7
Emission of base line year in tons of CO2e	tCO2e	tCO2e	C8
Value of intensity measure of base line year (note the definition of the intensity measured): 1.01 metric tons/MWh		tCO2e	
Target year		2045	
Reduction target as percentage of baseline value		90	
Target was set in year		2019	
% achieved (emission reductions)		55	C13
Description of target(s):		NorthWestern has committed to further reducing the carbon intensity of our electric generation in Montana by 90%, compared to 2010 levels, by 2045. See page 2 of the 2020 annual report under Environmental Sustainability.	
You may provide supporting evidence by attaching up to five (5) references.			
Alternative Method			
Target:			
KPI Metric:	Numerator:	Denominator (for intensity targets only)	
Baseline year:			
Target was set in year:			
Target year:			
KPI in baseline year:			
KPI in target year:			
Is the target part of an overarching initiative? (please specify at far right)			
You may provide supporting evidence by attaching up to five (5) references.			
EEI/ESG Sustainability Document Key Sustainability Statistics Report NorthWestern Corp. 2020 Annual Report Page(s) 2			
Reason for No Emissions Target	Five-year forecast	Please explain	
Primary reason			
Please select one of the following options. (Required)			
<input checked="" type="radio"/> We have absolute and/or relative (intensity) emissions targets using the Standard Method, and have completed the appropriate section of the table above. <input type="radio"/> We have emissions targets based on an Alternative Method, and have completed the appropriate section of the table above. <input type="radio"/> We do not set any targets for GHG emissions. <input type="radio"/> Not applicable. Please provide explanations in the appropriate comment box below. <input type="radio"/> Not known			

C7 This is a goal of our MT electricity supply portfolio which, in 2019, accounted for approximately 71% of the emissions associated with our supply portfolios in MT and SD.

C8 NorthWestern's goal is based on intensity not total tons. The CO2e associated with our MT and SD portfolios can be found in the EEI/ESG sustainability document or the Key Sustainability Statistics report, both of which are posted on NorthWestern's website. See reference below.

C13 The 2010 Baseline intensity of the Montana owned and long-term contracted resources used to serve our Montana customers was 2237 lbs/MWh. In 2019, the intensity was 999 lbs/MWh which is about a 55% reduction.

Additional Comments

NorthWestern's goal is based on intensity not total tons. The CO2e associated with our MT and SD portfolios can be found in the EEI/ESG sustainability document or the Key Sustainability Statistics report, both of which are posted on NorthWestern's website. See references .

It is important to note that on average 40% of the CO2 emissions associated with NorthWestern's MT electricity supply portfolio are associated with two Qualifying Facilities, one using petroleum coke as fuel and the other using waste coal as fuel, and NorthWestern is required by federal law to purchase the electricity from those two facilities. See line 7.3.1.2 on the "Montana" sheet of the referenced EEI/ESG Sustainability Excel document. These resources are required in NorthWestern's MT portfolio at least until the expiration of the associated contracts (one in 2024 and the other in 2028). NorthWestern cannot control the generation or emissions from these QF facilities.

References:





-  [EEI/ESG Sustainability Document](#)
-  [Key Stustainability Statistics Report](#)
-  [NorthWestern Corp. 2020 Annual Report](#) Page(s) 2

GHG and CO2 Emissions

ISS Env & Soc QualityScore Number: 50; 51; 52; 53; 54; 55; 56; 57

Environmental / Emissions / GHG and CO2 Emissions

Disclosures on GHG and CO2 emissions in metric tons

Totals in metric tons CO2	2020	2019	2018	2017	Public Disclosures	Disclosures at any level other than enterprise
Direct CO2 emissions					<p>The organization publicly discloses its direct CO2 emissions report.</p> <div style="border: 1px solid #ccc; padding: 5px; width: fit-content;">  EEI/ESG Sustainability Document Page(s) All  Key Stustainability Statistics Report </div>	NorthWestern calculates the CO2 and CO2e emissions associated with the energy supply portfolios in MT and SD, its natural gas T&D business and also those associated with its fleet. The energy supply portfolio emissions are published on NorthWestern's website and updated each year. CO2 emissions associated with NorthWestern's electricity supply portfolios and its natural gas business are included in the EEI/ESG and the AGA ESG reports located on NorthWestern's website.
Indirect CO2 emissions					The organization does not publicly disclose its indirect CO2 emissions report.	
Total CO2 emissions						
Direct GHG emissions					<div style="border: 1px solid #ccc; padding: 5px; width: fit-content;">  EEI/ESG Sustainability Document Page(s) ALL  Key Stustainability Statistics Report </div>	NorthWestern calculates the CO2 and CO2e emissions associated with the energy supply portfolios in MT and SD, its natural gas T&D business and also those associated with its fleet. The energy supply portfolio emissions are published on NorthWestern's website and updated each year. CO2 emissions associated with NorthWestern's electricity supply portfolios and its natural gas business are included in the EEI/ESG and the AGA ESG reports located on NorthWestern's website.
Indirect GHG emissions						
Scope 2 GHG emissions					The organization does not publicly disclose its Scope 2 GHG emissions report.	
Scope 3 GHG emissions					The organization does not publicly disclose its Scope 3 GHG emissions report.	
The organization discloses on CO2 emissions for any operations located outside primary domicile at any level other than enterprise:						
The organization discloses on GHG emissions for any operations located outside primary domicile at any level other than enterprise:						

Targets relating to GHG emissions: See page 2 of the 2020 annual report under Environmental Sustainability. NorthWestern has committed to replace 30% of out light-duty vehicles, 20% of new medium/heavy duty vehicles, 30% of new bucket trucks, and 100% of new forklifts with electric alternatives by 2030. NorthWestern has also committed to further reducing the carbon intensity of our electric generation in Montana by 90%, compared to 2010 levels, by 2045.						
Number of consecutive years of total GHG emissions data included in the most recent report: 5						
The organization discloses the percentage of scope 1 emissions covered under a regulatory program <input type="checkbox"/> Yes, the organization discloses the percentage of emissions covered under emissions-limiting regulations <input type="checkbox"/> Yes, the organization discloses the percentage of emissions covered under emissions-reporting regulations						
<input checked="" type="radio"/> Not applicable. Please provide explanations in the comment box below. <input type="radio"/> Not known						

Additional Comments

Scope 1 emissions-limiting and reporting regulations are not applicable to NorthWestern's service territory. Documents referenced below include energy supply resources by type of resource and a breakdown of MWhrs of energy delivered by resource type. NorthWestern strives to balance legal requirements to provide cost-effective, reliable and stably priced energy with being good stewards of natural resources and a diligent focus on sustainability. We own a mix of clean and carbon-free energy resources balanced with traditional energy sources that are necessary for us to deliver affordable and reliable electricity to our customers 24/7. In 2020, approximately 65 percent of our retail needs originated from carbon-free resources, more than two times better than the total U.S. electric power industry (29 percent carbon-free).

References:

-  [EEI/ESG Sustainability Document](#) Page(s) All
-  [Key Stustainability Statistics Report](#)
-  [NorthWestern Corp. 2020 Annual Report](#) Page(s) 2

GHG Verification

ISS Env & Soc QualityScore Number: 58

Environmental / Emissions / GHG Verification

NorthWestern Energy 's GHG inventory verification.

Scope	Verification/Assurance Status
Scope 1	<input type="checkbox"/>
Scope 2 type	<input type="checkbox"/>
Scope 3	<input type="checkbox"/>
<input type="radio"/> Not applicable. Please provide explanations in the comment box below. <input type="radio"/> Not known	

Additional Comments

NorthWestern does not currently independently verify GHG emissions data.

EMS: Certification/ Audit/ Verification

ISS Env & Soc QualityScore Number: 7; 8; 12; 60

Environmental / Other: Environmental / EMS: Certification/ Audit/ Verification

The company's Environmental Management System (EMS) is certified/verified/audited or employs the following external management systems, by percentages as indicated in the table below.

Name of Certification System	Percent coverage figures:	Percent certified in current reporting year by:	Target certification by NEXT reporting year
All EMS Systems	%	<input type="radio"/> Facilities/Sites <input type="radio"/> Turnover/Revenue <input type="radio"/> Production <input type="radio"/> Employees <input type="radio"/> Other	
<input type="checkbox"/> *ISO 14001 certified	*%	<input type="checkbox"/> *Entire company certified by third party or specialized companies <input type="checkbox"/> *Production facilities certified <input type="checkbox"/> *Administrative facilities certified <input type="checkbox"/> *Other facilities certified	
<input type="checkbox"/> *ISO 14001 attested	*%	<input type="checkbox"/> *Entire company attested <input type="checkbox"/> *Production facilities attested <input type="checkbox"/> *Administrative facilities attested <input type="checkbox"/> *Other facilities attested	
<input type="checkbox"/> EMAS (European Eco-management and Audit Schemes)	%	<input type="radio"/> Facilities/Sites <input type="radio"/> Turnover/Revenue <input type="radio"/> Production <input type="radio"/> Employees <input type="radio"/> Other	
<input type="checkbox"/> *ISO 50001 certification		*Details on ISO 50001 certification for the entire enterprise or at any facilities:	
<input type="checkbox"/> *Other EMS system or international standard	%	Specify details of internal verification:	
Total coverage for international standards:	%		
Percent coverage figures below are based on (e.g. % of operations, revenues, employees, etc.):			
<input type="checkbox"/> EMS is verified through international standards (e.g. ISO 14001, JIS Q 14001, EMAS certification)	% coverage:	Use the paperclip icon to attach supporting documentation. Up to five (5) references are allowed. Specify details of certification:	
<input type="checkbox"/> Internal verification/audit/certification by company's own specialists from headquarters	% coverage:	Use the paperclip icon to attach supporting documentation. Up to five (5) references are allowed. Specify details of internal verification:	
<input type="checkbox"/> Third party verification/audit/certification by specialized companies.	% coverage:	Use the paperclip icon to attach supporting documentation. Up to five (5) references are allowed. Specify details of third party verification:	
Total (should not exceed 100%)	% coverage:		
**Certified contractors:	% coverage:	Specify details of contractor certification:	
<input type="checkbox"/> *Company states that its Environmental Management System is based on ISO 14001 but not certified/attested to it.			
<input checked="" type="checkbox"/> Environmental management system is not verified/audited/certified			
Data publicly available:			
Please select one of the following options. (Required)			
<input type="checkbox"/> Our Environmental Management System (EMS) is certified / audited / verified, and we have completed the table above.			
<input checked="" type="checkbox"/> Not certified / audited / verified.			
<input type="checkbox"/> Not applicable. Please provide explanations in the appropriate comment box below.			
<input type="checkbox"/> Not known			

Additional Comments

NorthWestern's Environmental Management System is structured after the Plan-Do-Check-Act (PDCA) principles of ISO 14001 but has not been independently certified.

Energy Consumption Within the Organization GRI 302-1

ISS Env & Soc QualityScore Number: 61

Environmental / Energy / Energy Consumption Within the Organization GRI 302-1

Total fuel consumption within the organization from non-renewable sources, in joules or multiples, and including fuel types used.

Consumption by Fuel Type (Renewable)	Unit	2020	2019	2018	2017	
						C2
Total consumption from renewable fuel sources:						C19
Consumption by Fuel Type (Non-renewable)						
						C21
Total consumption from non-renewable fuel sources:						
Energy consumed						
Electricity	Megawatt hours (MWh)	20,391	21,860	21,724	20,968	
Heating						
Cooling						
Steam						
Total energy consumption	Megawatt hours (MWh)	20391	21860	21724	20968	
Energy Sold						C53
Electricity	Megawatt hours (MWh)	8,595,738	9,114,678	8,733,831	8,924,244	
Heating						
Cooling						
Steam						
Renewable Energy Certificates	thousand MWh	911.983	1,165.41	948.411	862.98	
Power Purchase Agreement	MWh					
*Percentage of total operational spending on energy (most recent reporting year): More than 0% but less than or equal to 5%						
*Our organization undertakes the following energy-related activities.						
<input checked="" type="checkbox"/> Consumption of fuel (excluding feedstocks)						
<input checked="" type="checkbox"/> Consumption of purchased or acquired electricity						
<input type="checkbox"/> Consumption of purchased or acquired heat						
<input type="checkbox"/> Consumption of purchased or acquired steam						
<input type="checkbox"/> Consumption of purchased or acquired cooling						
<input checked="" type="checkbox"/> Generation of electricity, heat, steam or cooling						
Standards, methodologies, and assumptions used: See comments below and attached references.						
Source of the conversion factors used:						
Publicly disclose a breakout of the sources of the renewable energy used Yes Link to disclosure: See Key Sustainability Statistics Report						
Data publicly available: Yes						C66

C2 The electricity used by NorthWestern is the same mix of resources in our MT and SD portfolios.

C19 The electricity used by NorthWestern is the same mix of resources in our MT and SD portfolios.

C21 The electricity used by NorthWestern is the same mix of resources in our MT and SD portfolios.




C53 See referenced documents.

C66 Annual FERC Form 1 Reports

Additional Comments

Documents referenced below include energy supply resources by type of resource and a breakdown of MWhrs of energy delivered by resource type. NorthWestern strives to balance legal requirements to provide cost-effective, reliable and stably priced energy with being good stewards of natural resources and a diligent focus on sustainability. We own a mix of clean and carbon-free energy resources balanced with traditional energy sources that are necessary for us to deliver affordable and reliable electricity to our customers 24/7. In 2020, approximately 65 percent of our retail needs originated from carbon-free resources, more than two times better than the total U.S. electric power industry (31 percent carbon-free).

References:

-  [Key Stustainability Statistics Report](#)
-  [NORTHWESTERN CORP 2020 10K](#) Page(s) 8
-  [2020 FERC Financial Report \(FORM No. 1\)](#) Page(s) 401a

Energy Disclosure

ISS Env & Soc QualityScore Number: 62; 63; 64; 65; 66; 67; 68; 69; 70

Environmental / Energy / Energy Disclosure

Details regarding public disclosure of energy consumption at NorthWestern Energy follow:

Publicly disclosed information:	Specify link(s) / documents(s)
<input checked="" type="checkbox"/> Total energy use	See Key Sustainability Statistic Report
<input type="checkbox"/> Normalized total energy use value	
<input type="checkbox"/> Energy use at any level other than enterprise	
<input type="checkbox"/> Percentage of energy used that is derived from renewable sources	
<input type="checkbox"/> Gross total of energy used that is derived from renewable sources	
<input type="checkbox"/> Total costs of energy consumption	
<input type="checkbox"/> Percentage of energy used that is derived from non-renewable sources	
<input type="checkbox"/> Gross total of energy used that is derived from non-renewable sources	
<input type="checkbox"/> Energy use for any of its operations located outside its primary domicile at any level other than enterprise	
<input type="checkbox"/> Amount of energy used that is derived from non-renewable sources at any level other than enterprise	
<input type="checkbox"/> Amount of energy used that is derived from non-renewable sources for any of its operations located outside its primary domicile at any level other than enterprise	
<input type="checkbox"/> Amount of energy used that is derived from renewable sources at any level other than enterprise	
<input type="checkbox"/> Amount of energy used that is derived from renewable sources for any of its operations located outside its primary domicile at any level other than enterprise	
<input type="radio"/> Not applicable. Please provide explanations in the comment box below.	
<input type="radio"/> Not known	

Additional Comments

Documents referenced below include energy supply resources by type of resource and a breakdown of MWhs of energy delivered by resource type. NorthWestern strives to balance legal requirements to provide cost-effective, reliable and stably priced energy with being good stewards of natural resources and a diligent focus on sustainability. We own a mix of clean and carbon-free energy resources balanced with traditional energy sources that are necessary for us to deliver affordable and reliable electricity to our customers 24/7. In 2020, approximately 65 percent of our retail needs originated from carbon-free resources, more than two times better than the total U.S. electric power industry (31 percent carbon-free).

References:

-  [Key Stustainability Statistics Report](#)

Energy Conservation Programs

ISS Env & Soc QualityScore Number: 71; 72; 73; 74; 75; 96; 97; 98; 99

Environmental / Energy / Energy Conservation Programs

Details of conservation programs for NorthWestern Energy follow:

Publicly disclosed energy conservation efforts/programs:	<p>NorthWestern Energy created the Efficiency Plus (E+) brand to signal ways that the consumer can reduce their use and seize the savings. Because we are a regulated utility, E+ program offerings vary depending upon which state our customers live in. We created the Efficiency Plus (E+) brand to identify tools and information for our customers to better manage their overall energy costs and, where applicable, obtain rebates or incentives to help offset the purchase and installation of qualifying measures.</p> <p>Two major projects for conservation efforts include: 1) installing smart meters in Montana starting in 2021 after we installed smart meters in the majority of our South Dakota and Nebraska service territory. 2) We are also in the middle of an LED streetlight upgrade for all street lights, yard lights and several home owner's association lights in Montana in the coming years.</p>
Company publicly discloses:	<p><input checked="" type="checkbox"/> Energy conservation resulting from such programs at any level other than enterprise Link to disclosure:https://www.northwesternenergy.com</p> <p><input type="checkbox"/> The amount of total investment in energy conservation programs</p> <p><input checked="" type="checkbox"/> Associated total savings or profits achieved as a result of energy conservation programs Link to disclosure:https://www.northwesternenergy.com</p> <p><input type="checkbox"/> The amount of investment in energy conservation programs at any level other than enterprise</p> <p><input type="checkbox"/> The associated savings or profits achieved as a result of energy conservation programs for any level other than enterprise</p> <p><input type="checkbox"/> Energy conservation results for any operations located outside the company's primary domicile at any level other than enterprise</p> <p><input type="checkbox"/> Savings or profits resulting from such programs for any operations located outside the company's primary domicile at any level other than enterprise</p>
<input type="radio"/> Not applicable. Please provide explanations in the comment box below. <input type="radio"/> Not known	

References:

 [Save Energy and Money](#)

Electricity Disclosures

ISS Env & Soc QualityScore Number: 78; 79; 80; 82; 83; 84; 85; 86; 87; 88; 89; 91

Environmental / Energy / Electricity Disclosures

Links and documents related to electricity that is purchased and used by NorthWestern Energy follow:

Publicly disclosed information:	Specify link(s)/document(s)
<input checked="" type="checkbox"/> Total electrical power use	20,391
<input type="checkbox"/> Normalized total electrical power use value	
<input type="checkbox"/> Electrical power use at any level other than enterprise	
<input type="checkbox"/> Percentage of electrical power used that is derived from non-renewable sources	
<input type="checkbox"/> Percentage of electrical power used that is derived from renewable sources	
<input type="checkbox"/> Gross total of electrical power used that is derived from non-renewable sources	
<input type="checkbox"/> Gross total of electrical power used that is derived from renewable sources	
<input type="checkbox"/> Breakout of the sources of the non-renewable electrical power used	
<input type="checkbox"/> Breakout of the sources of the renewable electrical power used	
<input type="checkbox"/> Total costs of electric power consumption	
<input type="checkbox"/> Electrical power use for any of its operations located outside its primary domicile at any level other than enterprise	
<input type="checkbox"/> Amount of electrical power used that is derived from non-renewable sources at any level other than enterprise	
<input type="checkbox"/> Amount of electrical power used that is derived from non-renewable sources for any of its operations located outside the U.S. at any level other than enterprise	
<input type="checkbox"/> Amount of electrical power used that is derived from renewable sources at any level other than enterprise	
<input type="checkbox"/> Amount of electrical power used that is derived from renewable sources for any of its operations located outside its primary domicile at any level other than enterprise	
<input type="radio"/> Not applicable. Please provide explanations in the comment box below.	
<input type="radio"/> Not known	

Additional Comments

Documents referenced below include energy supply resources by type of resource and a breakdown of MWhs of energy delivered by resource type. NorthWestern strives to balance legal requirements to provide cost-effective, reliable and stably priced energy with being good stewards of natural resources and a diligent focus on sustainability. We own a mix of clean and carbon-free energy resources balanced with traditional energy sources that are necessary for us to deliver affordable and reliable electricity to our customers 24/7. In 2020, approximately 65 percent of our retail needs originated from carbon-free resources, more than two times better than the total U.S. electric power industry (31 percent carbon-free).

References:

 [Key Sustainability Statistics Report](#)

Renewable Generation Capacity Approach

ISS Env & Soc QualityScore Number: 92; 93; 94; 95

Environmental / Energy / Renewable Generation Capacity Approach

Describe NorthWestern Energy 's approach to increasing generation capacity from renewable sources. Attach public references as necessary.

The selection of resources involves a complex analysis of customer and system needs in order to provide 24/7 reliable, least-cost electric service. Refer to the 2020 Supplement to the 2019 Electricity Supply Resource Procurement Plan (December 2020). This document addresses key resource planning issues including the development of a Resource Adequacy program for our region, application of Effective Load Carrying Capability (ELCC) as a measurement of the capacity contribution provided by variable energy resources like wind and solar and energy-limited resources like batteries and pumped hydro, and an analysis of the duration of events when NorthWestern is in capacity deficit situations and a discussion of the implications this has for future resource considerations. Our region is facing an increasing probability of near-term capacity deficits in the power supply during peak load conditions, and the chance of shortages is expected to grow unless the region invests in reliable capacity.

Additional Comments

NorthWestern strives to balance legal requirements to provide cost-effective, reliable and stably priced energy with being good stewards of natural resources and a diligent focus on sustainability. We own a mix of clean and carbon-free energy resources balanced with traditional energy sources that are necessary for us to deliver affordable and reliable electricity to our customers 24/7. Today, more than 60% of the energy produced by NorthWestern Energy for Montana comes from renewable and carbon-free sources, including hydro, wind and solar. Over the last decade, we have already reduced the carbon intensity of our energy generation in Montana by more than 50%. In the last five years alone, we have invested more than \$1 billion in clean energy projects, including hydro, wind and solar facilities. Information about our clean portfolio can be found on the "Our Company" page of our website at www.northwesternenergy.com.

References:

 [2020 Supplement to the 2019 Electric Supply Resource Procure...](#)

Controversies Summary

ISS Env & Soc QualityScore Number: 295

Management Approach / Controversies Summary

Details regarding environmental, social, or governance controversies at NorthWestern Energy

Controversy Category	Last Updated	Status	Headline	Source
<input checked="" type="radio"/> Not applicable. Please provide explanations in the comment box below. <input type="radio"/> Not known				

Additional Comments

As of May 3, 2021, NorthWestern Corporation is not aware of any pending or active environmental, social, or governance controversies. NorthWestern Corporation is subject to various other legal proceedings, governmental audits and claims that arise in the ordinary course of business. These are disclosed in NorthWestern's most recent quarterly filing with the SEC.

Company Reports

ISS Env & Soc QualityScore Number: 19

General Disclosures / Strategy / Company Reports

Do you publish the following reports? If so, please upload. Include recent documentation which has not been previously provided.

We publish these reports:

- Annual Report
- Financial Report
- Sustainability Report
- Environmental Report
- Social/Ethical Report
- Other Reports

Not applicable. Please provide explanations in the comment box below.
 Not known

Additional Comments

We live our values through a strong and binding commitment to safety in our work practices, excellence in service to our customers, treating everyone with respect, creating value for our stakeholders, conducting our business with the utmost integrity, community involvement, and environmental responsibility, each and every day As stewards of critical infrastructure, we have numerous publications that highlight our efforts.

References:



-  [BRIGHT Magazine](#)
-  [Environmental Stewardship: Our Commitment in Action](#)
-  [Code of Conduct and Ethics](#)
-  [Community Report](#)
-  [2021 Proxy Statement](#)
-  [NorthWestern Corp. 2020 Annual Report](#)

Corporate Environmental Policy Areas

ISS Env & Soc QualityScore Number: 1 ; 5

Environmental / Environmental Compliance / Corporate Environmental Policy Areas

Details regarding the environmental policy of NorthWestern Energy , whether stand alone or integrated into a broader policy statement.

Is the company's environmental management policy publicly available? Link to publicly available policy:  Environmental Policy	
Policy commitments:	Comment
<input checked="" type="checkbox"/> Commitment to environmental protection  Environmental Policy	NorthWestern's Environmental Policy reflects a commitment to environmental stewardship and compliance.

<input checked="" type="checkbox"/> Commitment to create environmental awareness 	<p>Under the Training Provision of the Environmental Policy, all employees are provided environmental and stewardship awareness training.</p>
<input checked="" type="checkbox"/> Commitment to implement an environmental management system 	<p>NorthWestern's commitment to its environmental management system is reflected in the Responsibilities Provision of the Environmental Policy. Further, NorthWestern maintains an environmental management information system as a central repository of environmental data and compliance actions.</p>
<input checked="" type="checkbox"/> Commitment to use natural resources or energy more efficiently 	<p>The Provisions of the Environmental Policy describe NorthWestern's commitment to the efficient use of natural resources and energy.</p>
<input checked="" type="checkbox"/> Commitment to reduce emissions, releases and waste 	<p>The Provisions of the Environmental Policy describe NorthWestern's commitment to supporting non-carbon emitting energy sources for our customers and minimizing waste.</p>
<input checked="" type="checkbox"/> Commitment to monitor the company's environmental performance NorthWestern Corporation Safety, Environmental, Technology ...	<p>The Board of Directors monitors the company's environmental performance. In addition, the Environmental Policy stipulates that environmental incidents will be tracked and reported.</p>
<input checked="" type="checkbox"/> Commitment to report regularly on environmental issues NorthWestern Corporation Safety, Environmental, Technology ...	<p>Quarterly environmental reports are provided to the NorthWestern Board. In addition, the Environmental Policy requires that environmental incidents be reported and tracked in its centralized environmental management information system.</p>
<input type="checkbox"/> Commitment to consult with stakeholders on environmental issues Missouri-Madison Protection, Mitigation and Enhancement Prog...	<p>Technical advisory committees have been established and provide input on fisheries, wildlife, and water quality protection, mitigation and enhancement projects associated with our hydroelectric projects.</p>
<input checked="" type="checkbox"/> Approved by senior management or the board of directors 	<p>The Environmental Policy is approved by multiple layers of management including the President and CEO.</p>
<p>Policy details:</p>	
<input checked="" type="checkbox"/> Date first issued Please specify: July 1, 2017 <input checked="" type="checkbox"/> Date last updated Please specify: Jul 1, 2017 <input type="checkbox"/> Part of another policy/code <input type="checkbox"/> Regularly updated/subject to periodic review <input type="checkbox"/> †Includes discrete, actionable elements from which programs can be derived and/or progress measured <input type="checkbox"/> Binding for all subsidiaries worldwide <input type="checkbox"/> Approved by the relevant board <input type="checkbox"/> †Board of Directors is specifically mentioned as having responsibility for the environmental policy <input checked="" type="checkbox"/> Publicly available <input checked="" type="checkbox"/> * Covers environmental impact of company's own operations <input type="checkbox"/> * Covers environmental impacts/risks of products & services <input type="checkbox"/> * Regular communication to executive management an/or board of directors <input checked="" type="checkbox"/> †Covers/ applies to suppliers and service providers (e.g. contractors) <input type="checkbox"/> †Covers/applies to other key business partners (e.g. non-managed operations, JV partners, etc.) <input type="checkbox"/> †Specifically references areas of challenge for the company and its industry <input checked="" type="checkbox"/> Applies to ___ % of the company's operations Please specify: 100% <input checked="" type="checkbox"/> †Policy is enterprise level <input checked="" type="checkbox"/> †Global policy applying the same comprehensive standards to all company operations regardless of geographic location <input type="checkbox"/> *Policy is in development and will be implemented in ___ months	
<p>Policy addresses:</p>	
<input checked="" type="checkbox"/> Greenhouse gases <input type="checkbox"/> Other emissions <input checked="" type="checkbox"/> Energy use/conservation <input type="checkbox"/> Water use/conservation	
<p>Policy provides commitments to:</p>	



<input type="checkbox"/> Stakeholder involvement in the development of the environmental policy <input type="checkbox"/> Stakeholder involvement in the implementation of the environmental policy <input type="checkbox"/> Stakeholder involvement in the evaluation of effective outcomes of the policy's implementation <input type="checkbox"/> Public reporting <input type="checkbox"/> Auditing <input type="checkbox"/> Third-party auditing <input type="checkbox"/> Quantifiable targets or goals	
<input checked="" type="checkbox"/> Company only has a mission/vision/values statement that includes reference to environmental issues without providing specific detail	
<input type="radio"/> Not applicable. Please provide explanations in the appropriate comment box below. <input type="radio"/> Not known	

Additional Comments

NorthWestern's Vision, Mission, and Value Statement is in its Code of Conduct and includes:

"Environment: We are committed to providing all customers with utility services that meet their current and future needs, while protecting and enhancing the quality of the environment. We will utilize our limited natural resources wisely and act responsibly to limit impacts on our air, water and land resources. "

References:

-  [Environmental Policy](#)
-  [Code of Conduct and Ethics](#)

Negative Environmental Impacts in the Supply Chain and Actions Taken GRI 308-2

ISS Env & Soc QualityScore Number: 6

Environmental / Supplier Environmental Assessment / Negative Environmental Impacts in the Supply Chain and Actions Taken GRI 308-2

Number of suppliers assessed for environmental impacts and the number identified as having significant actual and potential negative environmental impacts.

Number of suppliers subject to environmental impact assessments:	
Number of suppliers identified as having significant actual and potential negative environmental impacts:	
Significant actual and potential negative environmental impacts identified in the supply chain:	
Percentage of suppliers identified as having significant actual and potential negative environmental impacts with which improvements were agreed upon as a result of assessment:	
Percentage of suppliers identified as having significant actual and potential negative environmental impacts with which relationships were terminated as a result of assessment:	
Reason(s) for negative environmental impact terminations:	

Reason for Omission:

Unavailable
Steps being taken to obtain data and expected time frame for doing so:


Supplier Code of Conduct

ISS Env & Soc QualityScore Number: 366; 370

Social / Supplier Social Assessment / Supplier Code of Conduct

Information on the company's supplier code of conduct and whether it is publicly available.

Attach up to five (5) public URLs indicating where this information is available in your public reporting or corporate website.

 [Supplier Code of Conduct](#)

- Environmental standards for the suppliers' processes, products or services
- Child labor
- Fundamental human rights (e.g. labor rights, freedom of association, ILO conventions)
- Working conditions (e.g. working hours, lay-off practices)
- Remuneration
- Occupational health and safety
- Business ethics (e.g. corruption, anti-competitive practices)
- Our suppliers should have a sustainable procurement policy in place for their own suppliers

Please select one of the following options. (Required)

- Yes, our company has a Supplier Code of Conduct and it is publicly available. We have completed the table above.
- No, our company does not have a Supplier Code of Conduct OR this Code is not publicly available
- Not applicable. Please provide explanations in the appropriate comment box below.
- Not known

References:

 [Supplier Code of Conduct](#)

Certified Suppliers

ISS Env & Soc QualityScore Number: 18

General Disclosures / Ethics and Integrity / Certified Suppliers

Please provide the number and percentage of your suppliers that are ISO 14001 certified or other, and upload supporting documentation.

<input type="radio"/> Not applicable. Please provide explanations in the comment box below.	
<input checked="" type="radio"/> Not known	

Additional Comments

We encourage sound and prudent environmental, social and governance practices, and this Code applies to all Suppliers who support NorthWestern Energy, its partners and affiliates by delivering services or products necessary for the safe, successful and ethical conduct of our business. We expect our Suppliers to educate and supervise their employees, agents and subcontractors so they understand and comply with this Code. Compliance is an expectation for qualification as a Supplier with NorthWestern Energy.

References:

 [Supplier Code of Conduct](#)

CDP Survey Sign Off

ISS Env & Soc QualityScore Number: 198

General Disclosures / Reporting Practice / CDP Survey Sign Off

Details on the person that has signed off (approved) the CDP Climate Change and Water responses.

C15.1 CDP Climate Change	
Job Title	Corresponding Job Category
W10.1 CDP Water:	
Job Title	Corresponding Job Category
Job Title	
W10.2 Transfer of public data to the CEO Water Mandate's Water Action Hub:	
No	
<input type="radio"/> Not applicable. Please provide explanations in the comment box below. <input type="radio"/> Not known	

Water Use and Sources

ISS Env & Soc QualityScore Number: 203

Environment / Water & Wastewater Management / Water Use and Sources

(1) Total water withdrawn, (2) total water consumed, percentage of each in regions with High or Extremely High Baseline Water Stress

Water usage in thousands of cubic meters		
Total water from all sources	3897.96	
Significant sources of water	Water Source	Percentage of total use
	Yellowstone River	66%
Total water consumed in operations in thousands of cubic meters		
Activities in areas with High or Extremely High Baseline Water Stress None		
Percent of Total Water that is withdrawn in areas with High or Extremely High Baseline Water Stress	0	
Percent of Total Water consumed that is withdrawn from areas with High or Extremely High Baseline Water Stress	0	

Additional Comments

Water consumption at the thermal plants (coal and natural gas) is tracked and reported in the Key Sustainability Report. Water usage at the hydro facilities is non-consumptive. Risks associated with weather dependent generation sources is addressed in the 2019 and 2020 Supplement to the Electric Supply Resource Procurement Plan.

References:

-  [2020 Supplement to the 2019 Electric Supply Resource Procure...](#)
-  [Key Sustainability Statistics Report](#)

Inherent Risks

ISS Env & Soc QualityScore Number: 204; 205

Environmental / Water / Inherent Risks

A list of the inherent water risks that could generate a substantive change in business operations, revenue or expenditure, the potential impact to direct operations and the strategies to mitigate them.

W4.2 Country	River Basin	Primary risk driver	Type of potential impact	Company-specific description	Timeframe	Magnitude of potential impact	Likelihood	Able to provide potential impact figure?	Potential financial impact figure	Potential financial impact figure - minimum	Potential financial impact figure - maximum	Explanation of potential financial impact	Primary response to risk	Description of response	Cost of response	Explanation of cost of response
<input type="radio"/> Not applicable. Please provide explanations in the comment box below. <input checked="" type="radio"/> Not known																

Compliance Impacts

ISS Env & Soc QualityScore Number: 206

Environmental / Environmental Compliance / Compliance Impacts

For the current reporting year, describe any fines, enforcement orders, and/or other penalties for water-related regulatory violations.

W2.2 Was your organization subject to any fines, enforcement orders, and/or other penalties?					
No					
W2.2a Total number of fines	Total value of fines	% of total facilities/operations associated	Number of fines compared to previous year	Comment	
W2.2b Type of penalty	Financial value of penalty	Country	River basin	Type of incident	Description of penalty, incident, regulatory violation, significance and resolution

Additional Comments

Material environmental issues and legal proceedings are disclosed in the 10-Q.

References:

 [NorthWestern Corp. Q1 2021 10-Q](#)

CDP Introduction - Water

ISS Env & Soc QualityScore Number: 207

General Disclosures / Strategy / CDP Introduction - Water

Details on CDP reporting boundary and exclusions.

<p>W0.1</p> <p>Give a general description of and introduction to your organization.</p> <p>NorthWestern Corporation, doing business as NorthWestern Energy, provides electricity and/or natural gas to approximately 743,000 customers in Montana, South Dakota, Nebraska and Yellowstone National Park. For a discussion of NorthWestern's business strategy, see Management's Discussion and Analysis of Financial Condition and Results of Operations in our Annual Report on Form 10-K for the year ended December 31, 2020. We are working to deliver safe, reliable and innovative energy solutions that create value for customers, communities, employees and investors. This includes bridging our history as a regulated utility safely providing low-cost and reliable service with our future as a globally-aware company offering a broader array of services performed by highly-adaptable and skilled employees. We seek to deliver value to our customers by providing high reliability and customer service, and an environmentally sustainable generation mix at an affordable price. We are focused on delivering long-term shareholder value through:</p> <ul style="list-style-type: none"> • Infrastructure investment focused on a stronger and smarter grid to improve the customer experience, while enhancing grid reliability and safety. This includes automation in distribution and substations that enables the use of changing technology. • Integrating supply resources that balance reliability, cost, capacity, and sustainability considerations with more predictable long-term commodity prices. • Continually improving our operating efficiency. Financial discipline is essential to earning our authorized return on invested capital and maintaining a strong balance sheet, stable cash flows, and quality credit ratings. <p>We expect to pursue these investment opportunities and manage our business in a manner that allows us to be flexible in adjusting to changing economic conditions by adjusting the timing and scale of the projects.</p>	
<p>W0.2 State the start and end date of the year for which you are reporting data.</p> <p>From: January 1</p> <p>To: December 31</p>	
<p>W0.3</p> <p>List of countries for which you will be supplying data.</p> <p>United States of America</p>	
<p>W0.4</p> <p>What is the currency used for all financial information disclosed throughout your response?</p> <p style="text-align: right;">US Dollar</p>	
<p>W0.5 Category that describes the reporting boundary for companies, entities or groups for which water impacts are reported.</p> <p>Companies, entities or groups over which financial control is exercised</p>	
<p>W0.6 Within this boundary, are there any geographies, facilities, water aspects, or other exclusions from your disclosure?</p> <p>Yes</p>	
<p>W0.6a</p> <p>Geographies, facilities, water aspects, or other exclusions from our disclosure:</p> <p>Administrative offices and warehouse facilities are not included. All jointly owned generating facilities are included.</p>	<p>Explanation for this exclusion:</p> <p>These facilities are very small users of water. They use a relatively small amount of water primarily for sanitary purposes.</p>
<p><input type="radio"/> Not applicable. Please provide explanations in the comment box below.</p> <p><input checked="" type="radio"/> Not known</p>	

Water Withdrawal, Discharge and Consumption

ISS Env & Soc QualityScore Number: 208; 210

Environmental / Water / Water Withdrawal, Discharge and Consumption

What are the total volumes of water withdrawn, discharged, and consumed across all your operations, and how do these volumes compare to the previous reporting year?

W1.2b Water aspect	Volume (megaliters/year)	Comparison with previous reporting year	Please explain
Total withdrawals		Lower	These totals reflect 2020 water withdrawals for use by NorthWestern's natural gas plants and the portion of water withdrawals for use at the joint owned coal plants based on NorthWestern's ownership percentage. Water usage at the thermal plants varies based on megawatts generated so while it would appear there is an improvement (a reduction in water withdrawals), it could be the reduction is a result of fewer megawatts being generated at owned or jointly owned facilities that might be offset with market purchases that may or may not require water withdrawals.
Total discharges			Most of the water withdrawn for use at the natural gas projects and the jointly owned coal projects is consumed in the generating processes or through evaporation. Only the Neal 4 Coal Plant has a system that results in roughly the same amount of water withdrawn being discharged.
Total consumption	3897.96		Consumption includes water used in the various processes as well as evaporation.

Additional Comments

Water consumption (usage) is tracked for the thermal generating stations (coal and natural gas) and reported in the Key Sustainability Report.

References:

 [Key Sustainability Statistics Report](#)

Water Aspects Measured

ISS Env & Soc QualityScore Number: 209;212;213

Environmental / Water / Water Aspects Measured

Water aspects that are regularly measured and monitored and an explanation as to why or why not (for total operations).

W1.2 Water Aspects	% of sites/facilities/operations	Explanation
Water withdrawals – total volumes		
Water withdrawals – volume by sources		
[METALS & MINING SECTOR ONLY] Entrained water associated with your metals & mining sector activities - total volume		
Water withdrawals quality		
Water discharges – total volumes		
Water discharges – volume by destination		
Water discharges – volume by treatment method		
Water discharge quality - standard effluent parameters		
Water discharge quality – temperature		
Water consumption – total volume	76-99%	Water consumption (net) is reported in the Key Sustainability Report for all of the thermal facilities (coal and natural gas).
Water recycled/reused		
The provision of fully-functioning, safely managed WASH services to all workers		
Does a water recycling program exist? No		
Total amount of recycled water used is publicly disclosed: No		
The percentage of total water use that is satisfied through the use of recycled water is publicly disclosed: No		
<input type="radio"/> Not applicable. Please provide explanations in the comment box below. <input checked="" type="radio"/> Not known		

Additional Comments

NorthWestern collects and tracks water usage at the thermal plants annually. Results are published in the Key Sustainability Report. NorthWestern's primary water use is a non-consumptive use; using river water to generate electricity at its hydroelectric plants. Risks associated with weather dependent generation, including hydro, is addressed in the 2019 and 2020 Supplement to the Electricity Supply Resource Procurement Plan.

References:

 [2020 Supplement to the 2019 Electric Supply Resource Procure...](#)

 [Key Stustainability Statistics Report](#)

Air Emissions Disclosures

ISS Env & Soc QualityScore Number: 118; 119; 120; 121; 137

Environmental / Emissions / Air Emissions Disclosures

Describe NorthWestern Energy disclosures about reducing NOx, SOx and other significant air emissions. Attach public references as necessary.

Describe disclosures about reducing NOx, SOx and other significant air emissions. Attach public references as necessary.

Additional Comments

NorthWestern is currently retiring older dual-fueled units and ULSD fired units and replacing them with new reciprocating internal combustion engines to provide capacity to SPP.

In 2019, NorthWestern released a Request for Proposals for a project involving the retirement of dual-fueled combustion turbine electric generating units at its Huron Generating Station with efficient and flexible, natural gas fired reciprocating internal combustion engines. The original equipment did not have any emissions controls equipment. The new units will have selective catalytic reduction to control NOx and oxidation catalysts for control of CO and VOCs. The units are also lean-burn engines which provide primary NOx control.

On June 18, 2021 NorthWestern released a Request for Proposals for a project involving the replacement of a diesel-fueled combustion turbine electric generating unit with more efficient and flexible natural gas fired reciprocating internal combustion engines. The existing combustion turbine does not have emissions controls and the new engines will have selective catalytic reduction to control NOx and oxidation catalysts for control of CO and VOCs. The units are also lean-burn engines which provide primary NOx control.

Volatile Organic Compounds Emissions

ISS Env & Soc QualityScore Number: 125

Environmental / Emissions / Volatile Organic Compounds Emissions

Direct Volatile Organic Compounds (VOC) emissions for the company's operations for which there is a reliable and auditable data acquisition and aggregation system.

Direct VOC emissions	Unit	FY 2017	FY 2018	FY 2019	FY 2020	What was your target for FY 2020?	C1
Direct VOC emissions	metric tons						
Data coverage (as % of denominator)	percentage of:	%	%	%	%		
Third-party verification <input type="checkbox"/> Our data has been third-party verified in the most recent financial year reported. Please provide supporting evidence							
<input type="checkbox"/> We report publicly on this information, but the data in the table above differs from our publicly reported figures.							
<input type="checkbox"/> Please briefly explain if a merger, acquisition, divestment, etc. has temporarily caused a reduction in your ability to report optimal coverage or caused your target to appear abnormal:							
<input type="checkbox"/> We are not able to report this information in absolute terms, the information provided in the table above is normalized data.							
Please select one of the following options. (Required) <input type="radio"/> We track Volatile Organic Compounds (VOC) emissions, and have completed the table above. <input type="radio"/> We do not track Volatile Organic Compounds (VOC) emissions <input checked="" type="radio"/> Not applicable. Please provide explanations in the appropriate comment box below <input type="radio"/> Not known							

C1 NorthWestern does not currently report, in a single location, emissions of total VOCs from its energy supply portfolios but is in the process of developing an emissions database for its portfolios which will be included in its Key Sustainability Statistics Report posted on its website.

Additional Comments

NorthWestern does not currently report, in a single location, emissions of total VOCs from its energy supply portfolios but is in the process of developing an emissions database for its portfolios which will be included in its Key Sustainability Statistics Report posted on its website.

Waste by Type and Disposal Method GRI 306-2

ISS Env & Soc QualityScore Number: 159; 161; 162; 163; 164; 165; 166; 167

Environmental / Effluents and Waste / Waste by Type and Disposal Method GRI 306-2

Total weight of waste by type and disposal method.

Method of disposal and weight (metric tons) of non-hazardous waste	2020	2019	2018	2017
Reuse:				
Recycling:	391.25			
Composting:				
Recovery (including energy recovery):				
Incineration (mass burn):				
Deep well injection:				
Landfill:	346.94			
On-site storage:				
Other:				
Total weight of non-hazardous waste disposed:	738.19			
Method of disposal and weight (metric tons) of hazardous waste				
Reuse:				
Recycling:	24.61			
Composting:				
Recovery (including energy recovery):				
Incineration (mass burn):	18.25			
Deep well injection:				
Landfill:				
On-site storage:				
Other:				
Total weight of hazardous waste disposed:	42.86			
Total weight of non-hazardous and hazardous waste disposed:	781.05			
Report how the waste disposal method has been determined: 1. Disposed of directly by the organization or otherwise directly confirmed Please provide details on method 1: Manifests or disposal documentation				

Additional Comments

NorthWestern put a process in place starting in 2020 to track and report in the Key Sustainability Statistics Report generation and disposal of hazardous waste and other waste for its owned facilities. The process will be ongoing.

References:



 [Key Sustainability Statistics Report](#)

Hazardous Waste Management

ISS Env & Soc QualityScore Number: 160

Environmental / Effluents and Waste / Hazardous Waste Management

Provide details of NorthWestern Energy 's hazardous waste management program.

Program Attribute	Comment
<input checked="" type="checkbox"/> Commitment to reduce hazardous waste  Environmental Policy Page(s) 2	As stated in its Environmental Policy, NorthWestern strives to minimize generation of wastes
<input type="checkbox"/> Initiatives to reduce hazardous waste	
<input type="checkbox"/> Targets and deadlines	
<input checked="" type="checkbox"/> Monitoring and measurement  Key Stustainability Statistics Report	NorthWestern tracks hazardous waste generated and the amount recycled.

Additional Comments

Hazardous waste generated at all of NorthWestern's owned facilities is tracked and reported in the Key Sustainability Statistics Report.

References:

 [Key Stustainability Statistics Report](#)

Waste Management Programs

ISS Env & Soc QualityScore Number: 168; 169; 170; 172; 174; 175; 176; 177; 178

Environmental / Emissions / Waste Management Programs

Details of waste management programs at NorthWestern Energy follow:

We publicly disclose:	
<input type="checkbox"/>	Waste management programs.
<input checked="" type="checkbox"/>	Primary hazardous waste materials generated. Please specify: See referenced Key Sustainability Statistics Report
<input type="checkbox"/>	Hazardous waste disposal program.
<input type="checkbox"/>	Hazardous waste generation at any level other than enterprise.
<input type="checkbox"/>	Hazardous waste generation for any of its operations located outside its primary domicile at any level other than enterprise.
Waste management programs exist for the following waste items:	
<input type="checkbox"/>	Business waste.
<input type="checkbox"/>	Production waste.
<input type="checkbox"/>	Packaging waste.
<input type="checkbox"/>	Consumer product waste.
<input type="checkbox"/>	Chemical waste.
<input type="checkbox"/>	Solid waste.
<input type="checkbox"/>	Other waste.
<input checked="" type="radio"/>	Not applicable. Please provide explanations in the comment box below.
<input type="radio"/>	Not known

Additional Comments

NorthWestern's Safety, Health and Environmental Services Handbook includes information about managing solid waste, hazardous and non-hazardous waste, oil spills, PCB management, recycling used oil, and employee training among many other safety and environmental topics. This handbook is not currently disclosed publicly.

References:

 [Key Stustainability Statistics Report](#)

Hazardous Waste Reduction

ISS Env & Soc QualityScore Number: 181; 182; 183

Environmental / Emissions / Hazardous Waste Reduction

Does NorthWestern Energy have targets and programs in place to reduce hazardous waste production or increase recycling of hazardous waste? Please complete the following and include explanations in Additional Comments.

	Corporate-wide program with targets and measuring plan	Involves management incentives	Includes employee training
Hazardous waste minimization programs	<input type="radio"/> yes <input type="radio"/> no	<input type="radio"/> yes <input type="radio"/> no	<input type="radio"/> yes <input type="radio"/> no
<input type="radio"/> Not applicable. Please provide explanations in the comment box below. <input type="radio"/> Not known			

Human Rights Policy

ISS Env & Soc QualityScore Number: 282; 316; 329; 375; 376; 389




Social / Human Rights Assessment / Human Rights Policy

Please provide NorthWestern Energy's formal policy or code of conduct regarding human rights of internal stakeholders as it applies to NorthWestern Energy's worldwide operations, including operations in countries or regions with poor human rights records, dictatorial countries, or conflict zones. (This may be uploaded.) Also indicate which statements below apply to NorthWestern Energy's human rights policy.

Policy Information:	
<input checked="" type="checkbox"/>	*Discrete, actionable elements from which programs can be derived and/or progress measured
<input checked="" type="checkbox"/>	*The policy specifically applies to all company operations
<input type="checkbox"/>	*The policy exists at enterprise level
<input type="checkbox"/>	The policy addresses relevant company activities and significant impacts or issues identified
<input checked="" type="checkbox"/>	The policy is approved by the relevant board
<input checked="" type="checkbox"/>	The policy is available throughout the company
<input checked="" type="checkbox"/>	The policy is regularly reviewed and updated
<input checked="" type="checkbox"/>	The policy is publicly available
Link(s) to disclosure: https://www.northwesternenergy.com	
<input checked="" type="checkbox"/>	*The policy supports and/or has clear reference to conformance with the Universal Declaration of Human Rights
<input type="checkbox"/>	The policy covers sector-specific issues or issues mentioned in the UN Human Rights Norms for Business
<input type="checkbox"/>	There is a human rights policy for security forces
<input type="checkbox"/>	*Company discloses the number of personnel involved in the implementation of the company's human rights policy
<input checked="" type="checkbox"/>	*A department or staff is dedicated to the implementation of the company's human rights policy
<input type="checkbox"/>	*Company discloses third party involvement in the development of the company's human rights policy
<input checked="" type="checkbox"/>	*The policy supports any specific recognized public convention/external standard
List standards: 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.	
<input checked="" type="checkbox"/>	*Same human rights policy standards apply to suppliers/vendors
<input type="checkbox"/>	*Policy specifically references areas of challenge for the company and its industry
<input type="checkbox"/>	*The policy standards apply to franchisees
<input checked="" type="checkbox"/>	*Same policy standards for company apply to partners
<input checked="" type="checkbox"/>	*The policy specifically address the issue of human trafficking
<input type="checkbox"/>	*The policy specifically mentions the Board of Directors as having responsibility for the company's human rights policy
<input type="checkbox"/>	*Policy includes a training element
<input type="checkbox"/>	Policy includes civil liberties and freedom of speech
<input type="checkbox"/>	Web address:
Human Rights Details:	
<input checked="" type="checkbox"/>	Company makes a commitment to the provision of competitive compensation and benefits to its workforce
<input type="checkbox"/>	Company has a stated minimum age of employment
<input type="checkbox"/>	Company has a mission/vision/values statement concerning human rights
<p>Programs to develop workforce awareness, minimise risks of discriminatory practices and prevent workplace bullying or harassment, and improvement of human rights performance against any reported violations or weaknesses:</p> <p>NorthWestern Energy Code of Conduct and Ethics and related annual training for all employees.</p> <p>New supervisor training curriculum</p> <p>Leadership Bootcamp training curriculum</p> <p>Standardized exit interview process</p> <p>Code of Conduct and Ethics reporting channels including anonymous compliance line</p> <p>Employee engagement survey</p> <p>Chief Compliance Officer direct report to board audit committee chair</p>	
<input type="radio"/>	Not applicable. Please provide explanations in the comment box below.
<input type="radio"/>	Not known

Additional Comments

References:

-  [Code of Conduct Internal Investigation Policy](#)
-  [Code of Conduct and Ethics](#)
-  [Human Rights Policy](#)

Human Rights Policy Issues

ISS Env & Soc QualityScore Number: 317; 318; 378; 334; 381; 336; 338; 342; 331

Social / Human Rights Assessment / Human Rights Policy Issues

NorthWestern Energy 's policy or code of conduct on human rights addresses the following issues.

Policy includes and outlines:	
<input type="checkbox"/>	ILO conventions/standards
<input type="checkbox"/>	Protection of workers' rights
<input checked="" type="checkbox"/>	Child labor in non-U.S. operations
<input checked="" type="checkbox"/>	Forced labor in non-U.S. operations
<input type="checkbox"/>	Prison labor, and/or indentured labor
<input checked="" type="checkbox"/>	Requires supplier/vendor compliance
<input checked="" type="checkbox"/>	Clearly states protection of women's rights
<input checked="" type="checkbox"/>	Clearly states protection of minority groups' rights
<input type="checkbox"/>	Clearly states protection of indigenous peoples' rights
<input type="checkbox"/>	Guarantees free prior informed consent
<input type="checkbox"/>	Clear reference to conformance with the OECD Guidelines for Multinational Enterprises
<input checked="" type="checkbox"/>	Component of the policy(ies) addresses partners
<input checked="" type="checkbox"/>	Policy standards apply to partners
<input checked="" type="checkbox"/>	Policy is a global policy applying the same comprehensive standards to all company operations regardless of geographic location
<input checked="" type="checkbox"/>	Explicitly identifies the right to water as a fundamental human right
<input checked="" type="checkbox"/>	Business ethics policy extends to contract security providers
Policy commits to the following:	
<input type="checkbox"/>	Stakeholder involvement in the development of the company's human rights policy
<input type="checkbox"/>	Stakeholder involvement in the implementation of the human rights policy
<input type="checkbox"/>	Stakeholder involvement in the evaluation of effective outcomes of the policy's implementation
<input type="checkbox"/>	Public reporting
<input type="checkbox"/>	Auditing
<input type="checkbox"/>	Third-party auditing
<input type="checkbox"/>	Quantifiable targets or goals
<input type="checkbox"/>	Philanthropic programs to support local economic development (hospitals, schools, infrastructure)
<input type="checkbox"/>	Job creation - local hiring
<input type="checkbox"/>	Ethical business conduct with respect to violence and conflict
Corporate participation in the following:	
<input type="checkbox"/>	Voluntary Principles on Security and Human Rights (VPSHR)
Provide any additional information on human rights policies as applicable:	
<input type="radio"/> Not applicable. Please provide explanations in the comment box below.	
<input type="radio"/> Not known	

References:

 [Human Rights Policy](#)

Ruggie Framework

ISS Env & Soc QualityScore Number: 379

General Disclosures / Organizational Profile / Ruggie Framework

Familiarity with the UN Framework and Guiding Principles on Business and Human Rights (the Ruggie Framework) and its potential implications for our business:

Is your company aligned with an internationally accepted definition of human rights?	
<input checked="" type="checkbox"/>	Yes, with the United Nations Guiding Principles on Business and Human Rights
<input checked="" type="checkbox"/>	Yes, with another internationally accepted definition of human rights
<input type="checkbox"/>	No
<input type="checkbox"/>	Not sure
<input type="radio"/> Not applicable. Please provide explanations in the comment box below.	
<input type="radio"/> Not known	

References:

 [Human Rights Policy](#)

Human Rights Due Diligence Process

ISS Env & Soc QualityScore Number: 382

Social / Human Rights Assessment / Human Rights Due Diligence Process

Has NorthWestern Energy developed a due diligence process to proactively identify and assess potential impacts and risks relating to respecting human rights?

Please provide no more than five (5) supporting evidence of a risk mapping or other form of assessment to identify areas of potential risk. <input type="text"/>
<input type="checkbox"/> Risk identification in our own operations <input type="checkbox"/> Risk identification in our value chain or activities related to our business <input type="checkbox"/> Risk identification in new business relations (mergers, acquisitions, joint ventures...) <input type="checkbox"/> We do a systematic periodic review of the risk mapping of potential issues.
Please indicate the issues and vulnerable groups covered in your due diligence risk identification process. Please attach up to five (5) public supporting evidence: <input type="text"/>
Actual or potential human rights issues covered: <input type="checkbox"/> Forced labor <input type="checkbox"/> Human trafficking <input type="checkbox"/> Child labor <input type="checkbox"/> Freedom of association <input type="checkbox"/> Right to collective bargaining <input type="checkbox"/> Equal remuneration <input type="checkbox"/> Discrimination <input type="checkbox"/> Other
Groups at risk of human rights issues covered: <input type="checkbox"/> Own employees <input type="checkbox"/> Women <input type="checkbox"/> Children <input type="checkbox"/> Indigenous people <input type="checkbox"/> Migrant people <input type="checkbox"/> Third-party contracted labor <input type="checkbox"/> Local communities <input type="checkbox"/> Other
Please provide up to five (5) supporting evidence. <input type="text"/>
Please select one of the following options. (Required) <input type="radio"/> Yes, we have a due diligence process, and completed the table above. <input type="radio"/> We are developing a process, but we have not yet conducted any assessments. Please provide up to five (5) references. <input checked="" type="radio"/> No, we do not have a process <input type="radio"/> Not applicable. Please provide an explanation in the comment box below <input type="radio"/> Not known <input type="text"/>

Community/Society Controversies

ISS Env & Soc QualityScore Number: 302

Economic / Economic Performance / Community/Society Controversies

Please provide the details of NorthWestern Energy 's involvement in any controversies related to community and/or society.

<input type="radio"/> Not applicable. Please provide explanations in the comment box below.
<input checked="" type="radio"/> Not known

Additional Comments

As of April 3, 2021, NorthWestern Corporation is not aware of any relevant pending or active community and / or society controversies. NorthWestern Corporation is subject to various other legal proceedings, governmental audits and claims that arise in the ordinary course of business. These are disclosed in NorthWestern's most recent quarterly filing with the SEC.

References:


 [NorthWestern Corp. Q1 2021 10-Q](#)

Supplier Social Compliance

ISS Env & Soc QualityScore Number: 345; 359; 360; 361; 416; 463

Social / Human Rights Assessment / Supplier Social Compliance

Information on the company's supplier Code of Conduct assessments and audits.

Supply Chain Standards
We have a supplier Code of Conduct or set of standards
 Supplier Code of Conduct
Code of Conduct
Supplier code of conduct covers:
<input checked="" type="checkbox"/> Forced Labor
<input checked="" type="checkbox"/> Child Labor
<input checked="" type="checkbox"/> Working Hours
<input checked="" type="checkbox"/> Paid Overtime
<input checked="" type="checkbox"/> Minimum Wage
<input checked="" type="checkbox"/> Anti-Discrimination
<input checked="" type="checkbox"/> Freedom of Association
<input checked="" type="checkbox"/> Health & Safety
<input type="checkbox"/> Regular Employment
<input type="checkbox"/> Migrant Workers
<input type="checkbox"/> Acceptable Living Conditions
<input type="checkbox"/> Corporal Punishment/Disciplinary Practices
<input type="checkbox"/> Other
Training of Suppliers:
We have not taken steps to train suppliers on the Code of Conduct and/or specific labor issues
Is labor management performance is a factor when selecting new suppliers or awarding new contracts with existing suppliers? Please explain:
Scope of Supplier Audits
Type of audit used to assess suppliers' compliance with the Code of Conduct:
<input type="checkbox"/> Auditors are internal
<input type="checkbox"/> Third-Party
<input type="checkbox"/> Other
Suppliers and type of audits:
<input type="checkbox"/> Tier 1 (Final product assembly)
<input type="checkbox"/> Tier 2 (Components)
<input type="checkbox"/> Tier 3 (Raw Materials)
Public reporting of suppliers' non-compliance or violations of the Code of Conduct
<input type="checkbox"/>
Actions taken to address the issues of suppliers' non-compliance with the Code of Conduct:
<input type="radio"/> Not applicable. Please provide explanations in the comment box below.
<input type="radio"/> Not known

Additional Comments

We are not aware of any instances of non compliance with our supplier code of conduct.

Human Rights Supplier Audits

ISS Env & Soc QualityScore Number: 346; 347; 374; 344

Social / Human Rights Assessment / Human Rights Supplier Audits

Details related to audits of Supplier Human Rights Compliance at NorthWestern Energy follow:

An audit program is in place to evaluate suppliers' performance in the area of human rights (including human trafficking and slavery):	No
Frequency of audits conducted to evaluate suppliers' performance in the area of human rights:	
Percentage of the company's vendors subject to these audits in a given year:	0
<input checked="" type="radio"/> Not applicable. Please provide explanations in the comment box below.	
<input type="radio"/> Not known	

Additional Comments

Economic Inclusion - Suppliers

ISS Env & Soc QualityScore Number: 349

Social / Human Rights Assessment / Economic Inclusion - Suppliers

NorthWestern Energy discloses policies and practices used to promote economic inclusion when selecting suppliers

Does the company disclose its policies and practices used to promote economic inclusion when selecting suppliers? <input type="radio"/> Yes, we disclose policies and practices. <input type="radio"/> No, we do not disclose policies and practices.	Link to disclosure/reference title:
<input checked="" type="radio"/> Not applicable. Please provide explanations in the comment box below. <input type="radio"/> Not known	

Additional Comments

Policies and practices to encourage economic inclusion remain under development at NorthWestern

Significant Investment Agreements and Contracts That Include Human Rights Clauses or That Underwent Human Rights Screening GRI 412-3

ISS Env & Soc QualityScore Number: 350

Social / Human Rights Assessment / Significant Investment Agreements and Contracts That Include Human Rights Clauses or That Underwent Human Rights Screening GRI 412-3

Total number and percentage of significant investment agreements and contracts that include human rights clauses or that have undergone human rights screening.

Definition of 'significant investment agreements':	2020		2019		2018		2017	
	Number	%	Number	%	Number	%	Number	%
Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening								

Human Trafficking in Supply Chain

ISS Env & Soc QualityScore Number: 354; 357; 358

Social / Forced or Compulsory Labor / Human Trafficking in Supply Chain

Details on human trafficking and slavery in the supply chain for NorthWestern Energy follow:

We disclose:	
<input type="checkbox"/>	Our engagement in verification of our supply chain to evaluate and address risks of human trafficking and slavery in the following link/document.
<input type="checkbox"/>	Our requirement of direct suppliers to certify that materials used comply with the laws regarding slavery and human trafficking of the country or countries in which we are doing business
<input type="checkbox"/>	Our maintenance of internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and trafficking.
<input type="checkbox"/>	Our provision of training on human trafficking and slavery to employees and management with direct responsibility for supply chain management
<input type="checkbox"/>	We have disclosures relating to the California Transparency in Supply Chains Act of 2010.
<input type="radio"/>	Not applicable. Please provide explanations in the comment box below.
<input type="radio"/>	Not known

Conflict Minerals

ISS Env & Soc QualityScore Number: 395; 396; 397; 398; 399

Economic / Procurement Practices / Conflict Minerals

Details on a comprehensive strategy in place to avoid contributing to conflict through purchasing decisions and practices.

<p>If you have a publicly available policy in place for minerals from conflict-affected and high-risk areas, attach up to five (5) references indicating where this information is available in your public reporting or corporate website.</p>				
<p>Risk Identification</p> <p>Does your company have a formalized process/operating procedure in place to track minerals through the supply chain and identify and assess risks from minerals from conflict-affected and high-risk areas? Please attach supporting documents.</p>				
<p>The process covers the following:</p> <p><input type="checkbox"/> Necessity (e.g. what conflict minerals are used, how and why they are necessary to the functionality of the product)</p> <p><input type="checkbox"/> Supplier survey</p> <p><input type="checkbox"/> Response verification</p> <p><input type="checkbox"/> Country of origin determination</p> <p><input type="checkbox"/> Other</p>				
<p>Risk Management</p>				
<p>Has your company developed a risk management plan at smelter or refinery (SOR) or supplier level to mitigate or remediate identified risks from minerals from conflict-affected and high-risk areas?</p>				
<p><input type="checkbox"/> Additionally, we are investigating alternative sources for these minerals</p>				
<p>Quantification</p>	FY 2017	FY 2018	FY 2019	FY 2020
<p>Percentage of total revenues from products containing minerals from conflict-affected and high-risk areas</p>				
<p>Percentage of total revenues from products containing minerals from conflict-affected and high-risk areas coming from suppliers that have been verified conflict-free</p>				
<p>Labeling</p>				
<p>Does your company have any ongoing initiatives to label your products as conflict-free?</p>				
<p>Please select one of the following options. (Required)</p> <p><input type="radio"/> Yes, we have such a policy in place and have completed the table above.</p> <p><input type="radio"/> No, we do not have such a strategy in place.</p> <p><input checked="" type="radio"/> Not applicable, we don't purchase or procure conflict minerals. Please provide an explanation in the comment box.</p> <p><input type="radio"/> Not known</p>				

Additional Comments

NorthWestern does not mine or trade any minerals and therefore, does not source minerals from conflict-affected or high-risk areas.

Labor Policy




ISS Env & Soc QualityScore Number: 413; 414; 456; 457

Social / Labor/Management Relations / Labor Policy

Does NorthWestern Energy have a policy, set of principles, or code of conduct regarding labor standards and/or employee relations? If so, please upload supporting documentation, including date policy was created, and when it was last updated. Check all that apply below.

<input checked="" type="checkbox"/>	†Policy exists at enterprise level		
<input checked="" type="checkbox"/>	†Policy includes discrete, actionable elements from which programs can be derived and/or progress measured		
<input checked="" type="checkbox"/>	Policy applies to all of the company's operations (including world-wide)		
<input checked="" type="checkbox"/>	Policy applies to all of the company's U.S. operations		
<input checked="" type="checkbox"/>	Policy applies to all of the company's non-U.S. operations		
<input checked="" type="checkbox"/>	†Policy addresses partners		
<input checked="" type="checkbox"/>	†Policy addresses suppliers/vendors		
<input checked="" type="checkbox"/>	Policy applies to contract operations		
<input checked="" type="checkbox"/>	†Same policy standards for company apply to suppliers/vendors		
<input checked="" type="checkbox"/>	†Same policy standards for company apply to partners		
<input checked="" type="checkbox"/>	Policy addresses employee rights		
<input checked="" type="checkbox"/>	†Policy addresses forced labor, prison labor, and/or indentured labor		
<input checked="" type="checkbox"/>	†Clearly states workforce policy regarding the use of child labor		
<input checked="" type="checkbox"/>	*Policy addresses freedom of association		
<input checked="" type="checkbox"/>	*Percentage of employees covered by collective bargaining agreements	Please specify:	42
<input checked="" type="checkbox"/>	Policy meets ILO minimum standards		
<input checked="" type="checkbox"/>	The company publishes policies/principles regarding employees		
<input checked="" type="checkbox"/>	Policy applies to a percentage of company's employees	Please specify:	100
<input type="checkbox"/>	†Policy includes a commitment to quantifiable targets or goals		
<input checked="" type="checkbox"/>	*Policy addresses working conditions		
<input checked="" type="checkbox"/>	Policy addresses anti-discrimination/diversity and inclusion		
<hr/>			
<input type="checkbox"/>	Company only has a mission/vision/values statement concerning its approach to workforce development and management		
<input type="radio"/>	Not applicable. Please provide explanations in the comment box below.		
<input type="radio"/>	Not known		

References:

-  [Human Rights Policy](#)
-  [Supplier Code of Conduct](#)
-  [Code of Conduct and Ethics](#)

GC Advanced Criterion 6

ISS Env & Soc QualityScore Number: 458

Social / Labor/Management Relations / GC Advanced Criterion 6

The COP describes robust commitments, strategies or policies in the area of labor

Best Practices	GRI Indicator(s):
<input type="checkbox"/> Any relevant policies, procedures, and activities that the company plans to undertake to fulfill this criterion, including goals, timelines, metrics, and responsible staff	
<input type="checkbox"/> Reference to principles of relevant international labor standards (ILO Conventions) and other normative international instruments in company policies	
<input type="checkbox"/> Reflection on the relevance of the labor principles for the company	
<input type="checkbox"/> Written company policy to obey national labor law, respect principles of the relevant international labour standards in company operations worldwide, and engage in dialogue with representative organization of the workers (international, sectoral, national).	
<input type="checkbox"/> Inclusion of reference to the principles contained in the relevant international labor standards in contracts with suppliers and other relevant business partners	
<input type="checkbox"/> Specific commitments and Human Resources policies, in line with national development priorities or decent work priorities in the country of operation	
<input type="checkbox"/> Participation and leadership in wider efforts by employers' organizations (international and national levels) to jointly address challenges related to labor standards in the countries of operation, possibly in a tripartite approach (business – trade union – government).	
<input type="checkbox"/> Structural engagement with a global union, possibly via a Global Framework Agreement	
<input type="checkbox"/> Other established or emerging best practices:	
<input checked="" type="radio"/> Not applicable. Please provide explanations in the comment box below.	
<input type="radio"/> Not known	

Additional Comments

NorthWestern Energy only has U.S. employees

Culture Measurements

ISS Env & Soc QualityScore Number: 305; 306

Social / Diversity and Equal Opportunity / Culture Measurements

Description of the compliance and ethics function's approach to culture measurements at NorthWestern Energy .

<p>4G.1 Indicate which of the following, if any, accurately describe your company's approach to measuring corporate ethical culture. <i>Select all that apply and complete followup questions as noted. Regardless of selections, all respondents are asked to complete 4G.16 at bottom of page.</i></p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Employee focus groups (either in-person or using virtual gatherings on Zoom, etc.) <input checked="" type="checkbox"/> Employee interviews (non-managers) to assess ethical culture and employee perceptions <input checked="" type="checkbox"/> Management interviews to assess ethical culture and employee perceptions <input checked="" type="checkbox"/> Employee survey(s) that includes questions specific to the ethical culture of your company <input type="checkbox"/> Surveys of external stakeholders, such as clients, customers, vendors, or partners, that include questions specific to the ethical culture of your company <input type="checkbox"/> Visits by ethics and compliance personnel to sites outside of headquarters (if in-person site visits by ethics and compliance personnel were initially conducted in 2020 but discontinued on account of the COVID-19 pandemic, please select this response) <input checked="" type="checkbox"/> Reviewing social media (e.g., Twitter, Facebook) or other websites that include feedback or comments about the company (e.g., Glassdoor.com) <input type="checkbox"/> Monitoring a real-time, direct-to-employee feedback system or tool (e.g. Salesforce Feedback app, Yammer comments, intranet site comments) that allows for comments, suggestions, or input <input type="checkbox"/> Our company's culture measurement uses a unique approach 	
<p>4G.2 You indicated your organization conducts visits by ethics and compliance personnel to sites outside of headquarters. Before the COVID-19 pandemic, approximately how frequently did these site visits by ethics and compliance personnel occur?</p>	
<p>4G.3 You indicated that your company uses an employee survey(s) to measure employee perceptions of ethical culture and/or the compliance program. Which of the following types of surveys are used to measure ethical culture within your organization?</p> <ul style="list-style-type: none"> <input type="checkbox"/> A survey primarily developed to measure employee perceptions of ethical culture and/or the compliance program <input checked="" type="checkbox"/> Include questions on measuring employee perceptions of ethical culture and/or the compliance program as part of a broader employee engagement survey <input type="checkbox"/> Include questions on measuring employee perceptions of ethical culture and/or the compliance program as part of employee exit questionnaires <input type="checkbox"/> Include questions on measuring employee perceptions of ethical culture and/or the compliance program as part of employee onboarding questionnaires or assessments <input type="checkbox"/> Short "pulse"-type surveys distributed multiple times in a given calendar year that include questions on measuring employee perceptions of ethical culture and/or the compliance program <input type="checkbox"/> Other 	
Dedicated Culture Survey	Employee Engagement Survey
<p>4G.4 You indicated that your company uses a survey primarily developed to measure employee perceptions of ethical culture and/or the compliance program. Please indicate the frequency with which this survey is administered.</p>	<p>4G.5 You indicated that your company includes questions on measuring employee perceptions of ethical culture and/or the compliance program as part of a broader employee engagement survey. Please indicate the frequency with which engagement surveys are generally administered.</p> <p>Less frequently than every three years</p>

<p>4G.6 You indicated that your company uses a survey primarily developed to measure employee perceptions of ethical culture and/or the compliance program. What percentage of your total global workforce was offered the opportunity to participate in the most recent survey used to measure ethical culture and employee perceptions?</p>	<p>4G.7 You indicated that your company includes questions on measuring employee perceptions of ethical culture and/or the compliance program as part of a broader employee engagement survey. What percentage of your total global workforce was offered the opportunity to participate in the most recent employee engagement survey which included ethical culture and employee perception questions?</p> <p>90-100 percent</p>
<p>4G.8 You indicated that your company uses a survey primarily developed to measure employee perceptions of ethical culture and/or the compliance program. Of the employees who were provided the opportunity to respond to your survey(s), what percentage actually responded?</p>	<p>4G.9 You indicated that your company includes questions on measuring employee perceptions of ethical culture and/or the compliance program as part of a broader employee engagement survey. Of the employees who were provided the opportunity to respond to your survey(s), what percentage actually responded?</p> <p>70-79 percent</p>
<p>4G.10 You indicated that your company uses a survey primarily developed to measure employee perceptions of ethical culture and/or the compliance program. Indicate whether your company conducts this survey internally or with the assistance of a third party.</p>	<p>4G.11 You indicated that your company includes questions on measuring employee perceptions of ethical culture and/or the compliance program as part of a broader employee engagement survey. Indicate whether your company conducts this survey internally or with the assistance of a third party.</p> <p>Our company develops and administers the survey using a third party Please specify which third party Great Places to Work</p>
<p>4G.12 You indicated that your company uses a survey primarily developed to measure employee perceptions of ethical culture and/or the compliance program. Which topics are included within this survey?</p> <ul style="list-style-type: none"> <input type="checkbox"/> Employee's awareness of compliance resources (e.g., hotline awareness, Code of Conduct awareness) <input type="checkbox"/> Employee's opinion of executive ethical leadership or tone from the top <input type="checkbox"/> Employee's opinion of manager's ethical leadership or mood from the middle <input type="checkbox"/> Whether the employee has observed misconduct <input type="checkbox"/> Whether the employee is comfortable reporting misconduct <input type="checkbox"/> Employee's perceptions of the ethics and compliance function <input type="checkbox"/> Employee's perceptions of organizational justice (i.e., whether the company acts fairly) <input type="checkbox"/> Employee's perceptions of his or her peer environment and culture <input type="checkbox"/> Employee's perceptions of the effectiveness of the Code of Conduct <input type="checkbox"/> Employee's perceptions of the effectiveness of policies <input type="checkbox"/> Employee's perceptions of the effectiveness of compliance training <input type="checkbox"/> Whether the employee feels pressure to commit misconduct <input type="checkbox"/> Perceived frequency with which managers discuss ethics- or compliance-related issues <input type="checkbox"/> Other topics 	<p>4G.13 You indicated that your company includes questions on measuring employee perceptions of ethical culture and/or the compliance program as part of a broader employee engagement survey. Which topics are included within the engagement survey?</p> <ul style="list-style-type: none"> <input type="checkbox"/> Employee's awareness of compliance resources (e.g., hotline awareness, Code of Conduct awareness) <input type="checkbox"/> Employee's opinion of executive ethical leadership or tone from the top <input type="checkbox"/> Employee's opinion of manager's ethical leadership or mood from the middle <input type="checkbox"/> Whether the employee has observed misconduct <input checked="" type="checkbox"/> Whether the employee is comfortable reporting misconduct <input type="checkbox"/> Employee's perceptions of the ethics and compliance function <input checked="" type="checkbox"/> Employee's perceptions of organizational justice (i.e., whether the company acts fairly) <input type="checkbox"/> Employee's perceptions of his or her peer environment and culture <input checked="" type="checkbox"/> Employee's perceptions of the effectiveness of the Code of Conduct <input checked="" type="checkbox"/> Employee's perceptions of the effectiveness of policies <input type="checkbox"/> Employee's perceptions of the effectiveness of compliance training <input type="checkbox"/> Whether the employee feels pressure to commit misconduct <input type="checkbox"/> Perceived frequency with which managers discuss ethics- or compliance-related issues <input type="checkbox"/> Other topics
<p>Short "pulse"-type surveys</p>	
<p>4G.14 You indicated that your company conducts frequent "pulse"-type surveys that include questions on measuring employee perceptions of ethical culture and/or the compliance program. Which topics are generally included within these surveys?</p> <ul style="list-style-type: none"> <input type="checkbox"/> Employee's awareness of compliance resources (e.g., hotline awareness, Code of Conduct awareness) <input type="checkbox"/> Employee's opinion of executive ethical leadership or tone from the top <input type="checkbox"/> Employee's opinion of manager's ethical leadership or mood from the middle <input type="checkbox"/> Whether the employee has observed misconduct <input type="checkbox"/> Whether the employee is comfortable reporting misconduct <input type="checkbox"/> Employee's perceptions of the ethics and compliance function <input type="checkbox"/> Employee's perceptions of organizational justice (i.e., whether the company acts fairly) <input type="checkbox"/> Employee's perceptions of his or her peer environment and culture <input type="checkbox"/> Employee's perceptions of the effectiveness of the Code of Conduct <input type="checkbox"/> Employee's perceptions of the effectiveness of policies <input type="checkbox"/> Employee's perceptions of the effectiveness of compliance training <input type="checkbox"/> Whether the employee feels pressure to commit misconduct <input type="checkbox"/> Perceived frequency with which managers discuss ethics- or compliance-related issues <input type="checkbox"/> Other topics 	
<p>4G.15 You indicated that your company conducts frequent "pulse"-type surveys that include questions on measuring employee perceptions of ethical culture and/or the compliance program. Please describe the frequency, scope, and methodologies used in the administration of these surveys.</p>	
<p>Analysis and explanation of assessment results</p>	
<p>4G.16 Please describe what types of analysis, if any, is being done following the completion of your company's assessment of employees' perception of culture of ethics and/or the compliance program.</p> <p>Our third party vendor provides us with benchmark comparisons and we provide our managers with dashboards that allow them to review and further analyze engagement data for their area, however we do so in a manner that preserves anonymity.</p>	
<ul style="list-style-type: none"> <input type="radio"/> Not applicable. Please provide explanations in the comment box below. <input type="radio"/> Not known 	

Unfair Labor

ISS Env & Soc QualityScore Number: 300; 297

Social / Labor/Management Relations / Unfair Labor

Details on employee- and staff-related controversies, fines, settlements at NorthWestern Energy follow:

	2020	2019	2018	2017
Employee Related Controversies:	0	0	0	0
<input type="radio"/> Not applicable. Please provide explanations in the comment box below. <input type="radio"/> Not known				

Minimum Wage Policy

ISS Env & Soc QualityScore Number: 484

Social / Employment / Minimum Wage Policy

Does NorthWestern Energy have a formal policy statement or code of conduct addressing wages or minimum wages (see Guidance Notes)? Please select all that apply below, and upload relevant documents.

<input type="checkbox"/> Wages in general <input type="checkbox"/> Minimum wages at all locations <input type="checkbox"/> All employees in all countries are paid at least minimum wage <input type="checkbox"/> All employees in all countries are paid more than minimum wage <input type="checkbox"/> All employees in all countries are paid clearly more than minimum wage <input type="checkbox"/> The lowest compensation paid to one of company's employees (calculated for 100% job) is <input type="checkbox"/> *Minimum wages to ensure a decent standard of living for a worker and family
Details of commitment to ensure payment of a fair wage to all Group employees:
Policy publicly available:
<input checked="" type="radio"/> Not applicable. Please provide explanations in the comment box below. <input type="radio"/> Not known

Additional Comments

NorthWestern Energy follows federal guidelines for minimum wage and only operates in the U.S.

H&S Policy

ISS Env & Soc QualityScore Number: 459; 460; 461

Social / Occupational Health and Safety / H&S Policy

Does NorthWestern Energy have a policy or code of conduct addressing health and safety, and wellness, in the workplace?

	When created	When updated	% of workforce affected	% of operations affected
Worldwide policy/code: Does the company have a worldwide policy/code of conduct addressing health and safety, and wellness, in the workplace? No				
US policy/code only: Does the company have a US only policy/code of conduct addressing health and safety, and wellness, in the workplace? Yes	2002	2020	100	100
Non-US policy/code only: Does the company have a Non-US only policy code of conduct addressing health and safety, and wellness, in the workplace? No				
Policy addresses relevant company activities and significant impacts or issues identified: Does the company's policy/code of conduct on health and safety, and wellness, in the workplace address the relevant company activities and significant impacts or issues identified? Yes				
*Policy contains text regarding employee safety and/or safety training (see attached): *Does the company's policy or code of conduct addressing health, safety, and wellness, in the workplace contain text regarding employee safety and/or safety training (see attached)? Yes				
Policy is approved by the relevant board: Is the company's policy/code of conduct addressing health and safety, and wellness, in the workplace approved by the board? Yes				
Policy statement is available throughout the company: Is the policy/code of conduct addressing health and safety, and wellness, in the workplace available throughout the company? Yes				
Policy is regularly reviewed and updated: Is the company's policy/code of conduct addressing health and safety, and wellness, in the workplace regularly reviewed and updated? Yes				
Policy is publicly available: Is the company's policy/code of conduct addressing health and safety, and wellness, in the workplace publicly available? No				
Policy is applicable to contractors: Is the company's policy/code of conduct addressing health and safety, and wellness, in the workplace applicable to contractors? Yes				
<input type="radio"/> Not applicable. Please provide explanations in the comment box below. <input type="radio"/> Not known				

References:

 [Code of Conduct and Ethics](#)

H&S Management

ISS Env & Soc QualityScore Number: 465; 479

Social / Occupational Health and Safety / H&S Management

Information about NorthWestern Energy 's systems for managing health and safety issues follows. Please include managerial structure, responsibility and procedures, and the number of employees in health and safety management positions. Upload any relevant documentation.

Health and Safety Policy is group wide	Yes
Has a formal health and safety management system	Yes
Health and safety performance a factor in executive compensation	Yes
System for identifying and tracking work-related risks:	
<input checked="" type="checkbox"/> Requirement to track near misses in the system.	
Attributes of Health & Safety Mgmt program	
<input checked="" type="checkbox"/> Formal health and safety policy commitment	
<input checked="" type="checkbox"/> Managerial responsibility for health and safety issues	
<input checked="" type="checkbox"/> Procedures for hazard identification and risk assessment	
<input checked="" type="checkbox"/> Regular health and safety training programs for employees	
<input checked="" type="checkbox"/> Operating guidelines or procedures that are relevant for the industry	
<input checked="" type="checkbox"/> Targets to reduce health and safety incidents	
<input checked="" type="checkbox"/> Emergency preparedness procedures	
<input checked="" type="checkbox"/> Performance monitoring and measurement	
<input checked="" type="checkbox"/> Internal or external health and safety audits conducted at least every three years	
<input checked="" type="checkbox"/> Reporting on health and safety programs and performance	
*Details on formal health and safety management system: Internal safety management system in place	
*Certification of the health and safety management system to an international standard: Does the company have certification of the health and safety management system to an international standard? No	
Health and Safety policy is enforced with auditing at least every three years: Yes Please explain:Part of our internal auditing purview	
Percentage of health and safety system certified to OSHAS 18001:	0
Data publicly available: Is the data on the company's systems for managing health and safety issues publicly available? No	
<input type="radio"/> Not applicable. Please provide explanations in the comment box below. <input type="radio"/> Not known	

Accidents, Fatalities and Incidents

ISS Env & Soc QualityScore Number: 467; 468; 469; 470; 471; 472; 473

Social / Occupational Health and Safety / Accidents, Fatalities and Incidents

Employee, contractor and third party accidents, fatalities and incidents totals and rates.

Employees					
Incident Category	Unit of Measurement	2017	2018	2019	2020
Total number of accidents:		8	10	10	6
Total number of hours of lost work due to accidents:		6632	2536	2504	992
Total number of recordable incidents:		30	27	29	21
Lost-Time Incident Rate (LTIR):	Per 100 employees	0.51	0.64	0.65	0.39
Total Recordable Incidence Rate (TRIR) or Equivalent:	Per 100 employees	1.92	1.73	1.87	1.37
Total number of fatalities:		0	0	0	0
Fatality rate:	Per 100 employees	0	0	0	0
Contractors and Third Parties					
Incident Category	Unit of Measure	2017	2018	2019	2020
Total number of accidents:					
Total number of recordable incidents:					
Lost-Time Incident Rate (LTIR):					
Total number of fatalities:					
Total number of third party fatalities:					
Total number of employee and contractor fatalities:		0	0	0	0
Public Disclosure of TRIR or Equivalent: No, we do not publicly disclose our TRIR or TRIR Equivalent					
Details on TRIR and a description of the TRIR Equivalent if it was used instead of a TRIR:					
Explanation for the employee's Lost-Time Incident Rate (LTIR) trend:					
Public Disclosure of NMFR: No, we do not publicly disclose our NMFR					
<input type="radio"/> Not applicable. Please provide explanations in the comment box below.					
<input type="radio"/> Not known					

Additional Comments

We do not have a formalized process for tracking contractor recordable injuries or fatalities. Safety related incidents are reviewed at the point of contact. If there is an incident it gets reported to the company representative and an investigation is completed but we do not track OSHA Recordables or Lost Time.

References:

 [Key Sustainability Statistics Report](#) Page(s) 7

OHS Training & Education

ISS Env & Soc QualityScore Number: 475

Social / Occupational Health and Safety / OHS Training & Education

Which of the following does NorthWestern Energy 's health and safety systems provide for? Please upload evidence or examples of each.

<input checked="" type="checkbox"/>	Staff training on health and safety.	
<input checked="" type="checkbox"/>	Clear targets for health and safety improvements.	
<input checked="" type="checkbox"/>	Regular monitoring of key performance indicators (KPIs).	
<input checked="" type="checkbox"/>	Ongoing identification of hazards/risks identification.	
<input type="checkbox"/>	Other:	
<hr/>		
<input checked="" type="checkbox"/>	Internal or external seminars, training on potential health issues/risks	
<input checked="" type="checkbox"/>	Internal or external seminars, training on prevention measures	
<input checked="" type="checkbox"/>	Documentation or information systems available, e.g. brochures on potential health issues/risks and prevention measures, dissemination of health issues/risks and prevention measures information via intranet, etc.	
<input checked="" type="checkbox"/>	Emergency training	
<input checked="" type="checkbox"/>	Tracking of hours spent on education/training	
<input checked="" type="checkbox"/>	Quantified targets of education/training	
<input checked="" type="checkbox"/>	Link to tangibles: measures resulting in reduced number of work-related risks	
<input checked="" type="checkbox"/>	Coverage (%) in terms of business units/regions	Please specify: 100%
<input type="checkbox"/>	No such training in place to prevent work-related risks and/or occupational health hazards across the organization	
<hr/>		
<input type="radio"/>	Not applicable. Please provide explanations in the comment box below.	
<input type="radio"/>	Not known	

H&S Targets

ISS Env & Soc QualityScore Number: 476; 477; 478

Social / Occupational Health and Safety / H&S Targets

Does NorthWestern Energy have specific occupational, health and safety/wellness goals, objectives, or performance targets? If yes, please mark all that apply and upload any additional information.

	% coverage across overall business
Performance improvement targets have been set for business operations	<input type="radio"/> 0 % <input type="radio"/> 1-25% <input type="radio"/> 26-50% <input type="radio"/> 50-75% <input checked="" type="radio"/> >75%
Targets were achieved across the business last reporting year	<input type="radio"/> 0 % <input type="radio"/> 1-25% <input type="radio"/> 26-50% <input type="radio"/> 50-75% <input checked="" type="radio"/> >75%
Targets are in the public domain	<input checked="" type="radio"/> 0 % <input type="radio"/> 1-25% <input type="radio"/> 26-50% <input type="radio"/> 50-75% <input type="radio"/> >75%
Performance against targets are in the public domain	<input checked="" type="radio"/> 0 % <input type="radio"/> 1-25% <input type="radio"/> 26-50% <input type="radio"/> 50-75% <input type="radio"/> >75%
The company's main targets are:	Lost Time Incident Rate OSHA Recordable Incident Rate % of Completed Training
<input type="radio"/> Not applicable. Please provide explanations in the comment box below. <input type="radio"/> Not known	

Additional Comments

We compare ourselves to ourselves and to industry benchmarking to establish our safety targets

Women's Diversity

Does NorthWestern Energy have programs to support the hiring, retention, and promotion of women? Do these include any of the following? Please upload documentation, and select all that apply below.

Programs	% of employees affected
<input checked="" type="checkbox"/> Mentoring	10
<input checked="" type="checkbox"/> Diversity training	100
<input type="checkbox"/> Affinity/networking groups	
<input type="checkbox"/> Other:	
<input type="checkbox"/> Other:	
<input checked="" type="checkbox"/> *Company's workforce policy address the employment of women.	Specify link/attachment: https://www.northwesternenergy.com
<input type="radio"/> Not applicable. Please provide explanations in the comment box below. <input type="radio"/> Not known	

Diversity Tracking

Please provide the company's workforce diversity targets and information related to those targets.


Diversity performance objectives and targets: NorthWestern Energy's diversity plan includes the following objectives: <ul style="list-style-type: none"> • Realize the moral, ethical, and strategic innovation benefits of a diverse and valued workforce as a result of our overall Diversity, Equity, and Inclusion program efforts • Grow our inclusive culture demonstrating value for all forms of through employee feedback, employee and leadership education programs such as unconscious bias and inclusiveness, conscious communication efforts, and the encouragement of inclusive behaviors • Cultivate and recruit diverse candidates for energy careers in our service through general and targeted outreach and career development programs • Maintain ongoing fairness and compliance in our human resources processes and practices through ongoing training, measurement and monitoring 	
Has company achieved its targets?	
Systems to monitor/track diversity data and indicate if baseline data have been established: NorthWestern Energy is an Affirmative Action employer and as such maintains an annual affirmative action plan.	
Diversity Program Attribute	Comment
<input checked="" type="checkbox"/> Managerial or board level responsibility for diversity initiatives <input type="checkbox"/>	
<input checked="" type="checkbox"/> Targeted recruitment <input type="checkbox"/>	
<input checked="" type="checkbox"/> Training and guidance regarding diversity <input type="checkbox"/>	
<input checked="" type="checkbox"/> Diversity initiatives that go beyond legal compliance <input type="checkbox"/>	
<input type="checkbox"/> Employee affinity groups, diversity councils, or networking groups <input type="checkbox"/>	
<input checked="" type="checkbox"/> Mentorship programs <input type="checkbox"/>	
<input checked="" type="checkbox"/> Initiatives supporting a diverse workforce <input type="checkbox"/>	
<input checked="" type="checkbox"/> Diversity monitoring or audits <input type="checkbox"/>	
<input type="checkbox"/> Not applicable. Please provide explanations in the comment box below. <input type="checkbox"/> Not known	

Equal Opp Policy

ISS Env & Soc QualityScore Number: 430; 431; 432; 433; 434; 435; 436; 437; 438

Social / Diversity and Equal Opportunity / Equal Opp Policy

Details on a written policy that addresses equal employment opportunity and diversity for NorthWestern Energy follow.

<input checked="" type="checkbox"/> Age <input type="checkbox"/> Child care facilities/subsidy <input checked="" type="checkbox"/> Disability <input checked="" type="checkbox"/> Flexible working hours <input type="checkbox"/> Job sharing <input checked="" type="checkbox"/> Gender <input checked="" type="checkbox"/> gender identity and/or gender expression <input checked="" type="checkbox"/> Ethnic or social origin <input checked="" type="checkbox"/> Sexual orientation <input type="checkbox"/> Sabbatical/career breaks <input checked="" type="checkbox"/> Religion <input checked="" type="checkbox"/> Race <input checked="" type="checkbox"/> Other <small>Please specify: Color; Genetics; Protected Veteran Status; Ancestry; National Origin; Marital Status</small> <input type="checkbox"/> Company has set management objectives on diversity <input checked="" type="checkbox"/> †Commits to fair and equal wages to employees regardless of gender <input checked="" type="checkbox"/> Policy and its outcomes are regularly reviewed <input checked="" type="checkbox"/> Policy applies to indicated percentage of the company <small>Please specify: 100%</small> <input checked="" type="checkbox"/> Policy is publicly available <small>Link to disclosure: https://www.northwesternenergy.com</small> <input type="checkbox"/> No such policy; company plans to implement one by (date):	
Percentage of company covered by equal opportunity policy: 100	
Measures to promote equal opportunities, and diversity and inclusion: Details on measures the company has taken to promote equal opportunities, and diversity and inclusion:	
Are the company's Equal Opportunity policies publicly available? Policy publicly available. <small>Link to disclosure and text: https://www.northwesternenergy.com</small>	
Policy Attributes	Policy Attributes
<input checked="" type="checkbox"/> Lists the types of discrimination the company is committed to eliminate	race, color, religion, creed, age, gender, national origin, ancestry, disability, veteran status, sexual orientation or gender identity or any other protected class in accordance with applicable federal or state laws and statute
<input checked="" type="checkbox"/> Commitment to ensure equal opportunity	Promotes employee and job applicant access to open positions or advancement based on job requirements and qualification to perform a job without regard to race, color, religion, creed, age, gender, national origin, ancestry, disability, veteran status, sexual orientation or gender identity or any other protected class in accordance with applicable federal or state laws and statutes unless the reasonable demands of the job require a distinction to be made. Actions including, but not limited to, recruitment, hiring, placement, training, promotion, benefits, transfer, compensation, and termination. See additional comments
<input checked="" type="checkbox"/> Reference to the ILO conventions  Human Rights Policy	
<input type="radio"/> Not applicable. Please provide explanations in the comment box below. <input type="radio"/> Not known	

Additional Comments

NorthWestern Energy will make reasonable accommodation for qualified individuals with known disabilities unless doing so would result in an undue hardship. All employees are responsible for supporting equal opportunity and assisting NorthWestern Energy in meeting the objectives of this policy. Employees with questions or concerns about discrimination in the workplace are encouraged to bring the issues to the attention of their immediate supervisor or their human resources generalist. All employees found to be engaging in any type of adverse employment action or unlawful discrimination will be subject to disciplinary action, up to and including termination of employment.

Social / Diversity and Equal Opportunity / Diversity of Governance Bodies and Employees GRI 405-1

Composition of governance bodies and breakdown of employees per employee category according to gender, age group, and other indicators of diversity.

	Male		Female		Minority or Vulnerable Group		Age groups					
	Number	%	Number	%	Number	%	% <30 yrs old	% 30-50 yrs old	% >50 yrs old			
Governance body (e.g., board) members	5	62.5	3	37.5	1	12.5	0	25	75			
	Male		Female		Minority Groups		Age groups					
Employees by job category (per company breakout)	Global number	% in home country	Global %	Global number	% in home country	Global %	Global number	% in home country	Global %	% <30 yrs old	% 30-50 yrs old	% >50 yrs old
Total	1118		73	421		27	47		3.1	11	50	49
Managers	164	100	74	57	100	26	5	100	2.25	1.4	52.5	46.1
Employee Average Age:	45											
Data publicly available:												
Yes												

Reason for Omission:
 Not Applicable
 Why considered not applicable:
 All information requested has been provided, no information has been omitted.

Additional Comments

Q390: Does the board exhibit ethnic or racial diversity?
 A: Yes, the board has one director of Middle Eastern descent.

References:

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Composition of the Highest Governance Body and its Committees GRI 102-22

General Disclosures / Governance / Composition of the Highest Governance Body and its Committees GRI 102-22

Composition of the highest governance body and its committees.

	Male	Female	Total Number	
Total board members with executive functions	1	0	1	
Total non-executive directors (excluding independent directors)	0	0	0	
Total independent non-executive directors on the board	4	3	7	
Total board	5	3	8	
	Total			
Membership of under-represented social groups	1			
Stakeholder Representation:	0			
Board member	Other commitments	Competences relating to economic, environmental and social impacts	Stakeholder representation	Tenure/term length
Dana Dykhous	Chief Executive Officer, First PREMIER Bank	Finance, executive, service territory, board.	No	12
Tony Clark	Senior Advisor, Wilkinson Barker	Utility, executive, regulatory, legal/public policy, board.	No	5
Jan Horsfall	Managing Partner, Red Surtboard, LLC	Finance, executive, technology, information, cyber, legal/public policy, marketing, board.	No	6
Britt Ide	President, Ide Energy & Strategy	Utility, executive, regulatory, engineering, technology, information, cyber, service territory, legal/public policy, marketing, board.	No	4
Bob Rowe	Chief Executive Officer, NorthWestern Corporation	Utility, finance, executive, regulatory, service territory, legal/public policy, board.	No	13
Linda Sullivan	Retired Executive Vice President and Chief Financial Officer of American Water	Utility, finance, executive, regulatory, technology, information, cyber, board.	No	4
Mahvash Yazdi	President, Feasible Management Consulting	Utility, finance, executive, technology, information, cyber, board.	No	2
Jeff Yingling	Partner, Energy Capital Ventures	Utility, finance, executive, technology, information, cyber, board.	No	2
Diversity is a concept that is difficult to simply define or measure, especially in a questionnaire completed by companies located around the world. For this reason, explain any diversity, as your company defines it, among the directors on your Board or other governing authority.				
Ethnic Diversity: 1 Middle Eastern director Gender Diversity: 3 female, 4 male directors Age Diversity: age 40-49, 2 directors; age 50-59, 1 director; age 60-69, 5 directors Tenure Diversity: less than two years, 2; 3-9 years, 4; 10+ years, 2				
Board type				
<input checked="" type="radio"/> One-tier <input type="radio"/> Two-tier				
Female Chief Executive Officer or Equivalent				
<input type="radio"/> Yes <input checked="" type="radio"/> No				
Female Chairperson or Equivalent				
<input type="radio"/> Yes <input checked="" type="radio"/> No				
Data publicly available:				
Yes Link to disclosure:Proxy Materials (northwesternenergy.com)				

References:

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Supply Chain Human Rights Policy

Does NorthWestern Energy have a formal human rights policy statement or code of conduct governing its sourcing/supply chain (i.e. suppliers, vendors, contractors and sub-contractors)? If so, please upload this policy, and select all that apply to this policy below.

Also please describe below in Additional Comments any other systems/programs to manage human rights issues in the supply chain.

<input checked="" type="checkbox"/>	*We have a clearly stated policy regarding our expectations from suppliers in the area of human rights (i.e. Code of Vendor Conduct)	
Details:		
<input type="checkbox"/>	The company is in the process of developing a code of conduct for suppliers to be implemented by	
<input type="checkbox"/>	Vendors, contractors and suppliers are required to comply with the company's own formal policy with regard to human rights issues worldwide	
<input checked="" type="checkbox"/>	*Respect for/reference to core ILO labour standards relating to equal opportunities/non-discrimination; freedom of association; the right to collective bargaining; the use of forced labour	
<input type="checkbox"/>	*Reference to conformance with the UN Universal Declaration of Human Rights	
<input type="checkbox"/>	*Reference to conformance with the OECD Guidelines for Multinational Enterprises	
<input type="checkbox"/>	*Statement on working hours and leave	
<input type="checkbox"/>	Statement on living conditions	
<input checked="" type="checkbox"/>	*Statement on freedom of association	
<input checked="" type="checkbox"/>	*Statement on collective bargaining	
<input checked="" type="checkbox"/>	*Statement on child labor	
<input checked="" type="checkbox"/>	*Statement on forced labor	
<input type="checkbox"/>	*Statement on debt bondage	
<input checked="" type="checkbox"/>	When was policy created?	Please specify: 11/17/2020
<input checked="" type="checkbox"/>	When was policy last updated?	Please specify: 11/17/2020
<input type="checkbox"/>	Policy has been translated and disseminated to all suppliers	
<input type="checkbox"/>	Policy has been translated and disseminated to all suppliers and their employees	
<input type="checkbox"/>	How many tiers of vendors/suppliers does policy apply	
<input type="checkbox"/>	How often is policy required to be signed off on by vendors/suppliers	
<input checked="" type="checkbox"/>	*Policy is publicly available	
<input checked="" type="checkbox"/>	Policy is available on request	
<input type="checkbox"/>	Policy is integrated with other aspects of supplier policy	
<input type="checkbox"/>	Policy includes commitments (if company is a major user of agricultural products) to guarantee fair payments to small producers	
<input type="checkbox"/>	*Programs are in place to assist suppliers in improving their performance in the area of human rights	
<p>Initiatives to reduce the social risks in supply chain: NorthWestern Energy developed and implemented in late 2020 a Supplier Code of Conduct and Human Rights Policy. Efforts to communicate standards and further develop policies and practices to reduce social risk in supply chains are in process.</p>		
<input type="radio"/>	Not applicable. Please provide explanations in the comment box below.	
<input type="radio"/>	Not known	

References:

-  [Human Rights Policy](#)
-  [Supplier Code of Conduct](#)

Training Information

Please provide information on NorthWestern Energy 's employee training programs as requested below. Include details about the programs in Additional Comments and upload relevant documentation.

Company-wide policy exists for training and education:				
Reporting Currency:	2020	2019	2018	2017
Total budget for training	1086373	1258261	1108981	1328247
Average amount spent on training per employee	332	644	580	668
Hours spent on employee training during the reporting period	22134	42286	32350	27459
Average number of paid training hours per employee	13.5	25	18	16
Average number of paid training days per employee	1.67	3	2.25	2
Average number of paid training days per full-time male employee	17.5	25	19	17
Average number of paid training days per full-time female employee	10.5	15	11	15
Proportion of employees that have a training and development review each year				
Average number of paid training days per board member	.5	.5	.5	.5
Other (please specify):				
Data publicly available:				
Is the company's data on employee training publicly available?				
No				
<input type="radio"/> Not applicable. Please provide explanations in the comment box below. <input type="radio"/> Not known				

Customer Satisfaction Measurement

ISS Env & Soc QualityScore Number: 307

Economic / Other: Economic / Customer Satisfaction Measurement

Information on whether NorthWestern Energy monitors and sets quantitative targets to improve customer satisfaction, and whether targets and results are communicated externally follows.

Customer satisfaction as % satisfied customers out of total number of customers responding to the survey	Unit	2020	2019	2018	2017	Target for most recent reporting year
Satisfied Customers	% of satisfied customers out of total number of customers responding to the survey					
Data coverage: % of customers surveyed (both respondents and non-respondents) out of total number of customers, % of revenues, etc.	percentage of:					
<input type="checkbox"/> We measure customer satisfaction with the unit "% of satisfied customers out of total number of customers responding to the survey." <input type="checkbox"/> Please tick this option if your supporting evidence is available in the public domain						
Different approach/unit for measuring customer satisfaction						
Different approach/unit used to measure customer satisfaction: JD Power Residential Gas and Electric Survey	Specify unit: 1 - 1000	721.6	718.9	710.7	696.6	687.2
Data coverage: % of customers surveyed (both respondents and non-respondents) out of total customers, % of revenues, etc.	percentage of:					
<input type="checkbox"/> We use another approach or unit to measure satisfaction <input checked="" type="checkbox"/> Please tick this option if your supporting evidence is available in the public domain Key Sustainability Statistics Report Page(s) 5						
Please select one of the following options. (Required) <input type="radio"/> We measure customer satisfaction with the unit "% of satisfied customers out of total number of customers responding to the survey" and have completed ONLY THE FIRST TABLE above. <input checked="" type="radio"/> We use another approach or unit to measure satisfaction, and have completed ONLY THE SECOND TABLE above. <input type="radio"/> Customer satisfaction is not monitored. <input type="radio"/> Not applicable. Please provide explanations in the appropriate comment box below. <input type="radio"/> Not known						

Additional Comments

We also do the following surveys -
 Flynn Wright Operational and Reputational
 Key Account Survey

Types of Audits

ISS Env & Soc QualityScore Number: 371 ; 373

Social / Human Rights Assessment / Types of Audits

Please provide the information requested below regarding NorthWestern Energy 's types of supplier audits.

If not applicable, please indicate in the No Data section and explain in Additional Comments.

Types of supplier audits addressed in vendor code of conduct:
<input type="checkbox"/> Generic <input type="checkbox"/> Environmental Management <input type="checkbox"/> Product Safety <input type="checkbox"/> Workplace Labor Issues
<input type="radio"/> Not applicable. Please provide explanations in the comment box below. <input type="radio"/> Not known

Incidents of Non-Compliance Concerning Product and Service Information and Labeling GRI

417-2

ISS Env & Soc QualityScore Number: 308

Social / Marketing and Labeling / Incidents of Non-Compliance Concerning Product and Service Information and Labeling GRI 417-2

Total number of incidents of non-compliance with regulations and voluntary codes concerning product and service information and labeling, by type of outcomes

Company has not identified non-compliance with regulations or voluntary codes regarding product and service information and labeling				
	2020	2019	2018	2017
Total number of incidents of non-compliance with product and service information and labeling regulations resulting in a fine or penalty:				
Total number of incidents of non-compliance with product and service information and labeling regulations resulting in a warning:				
Total number of incidents of non-compliance with voluntary codes for product and service information and labeling:				

Reason for Omission:

Not Applicable

Why considered not applicable:

Fraud Litigation

ISS Env & Soc QualityScore Number: 309

Economic / Anti-Competitive Behavior / Fraud Litigation

Details on whether NorthWestern Energy has paid any fines/penalties/settlements or court-imposed awards in billing, deceptive marketing and/or fraud cases within the last three years.

7.7 In the past five years, which of the following (if any) apply to your company (including any subsidiaries or joint ventures) or any members of senior leadership?

Subject to a deferred prosecution or non-prosecution agreement
 Subject to a corporate integrity agreement
 Required to have a compliance monitor
 Indicted
 Debarred
 None of the above

7.8 As part of the evaluation process, Ethisphere conducts a review of public filings and adverse media. If there is a significant issue Ethisphere will find as part of this evaluation, please provide any details you would like to present on that issue.

Not applicable. Please provide explanations in the comment box below.
 Not known

United Nations Global Compact

ISS Env & Soc QualityScore Number: 239; 240

General Disclosures / Organizational Profile / United Nations Global Compact

Information on the company's, or its subsidiaries, involvement with the UN Global Compact.

No, we are not a signatory to the UN Global Compact

Data publicly available:

Not applicable. Please provide explanations in the comment box below.
 Not known

Additional Comments

NorthWestern Corp only operates in the United States and has not elected to pursue membership in the UN Global Compact at this time.

CSR Report

ISS Env & Soc QualityScore Number: 241; 242; 245; 246; 247

General Disclosures / Stakeholder Engagement / CSR Report

Details on how corporate social responsibility (CSR) at NorthWestern Energy is communicated.

Does your company produce a report regarding its corporate citizenship, responsibility and sustainability:

No

Yes, we produce a stand-alone Corporate Citizenship, Responsibility and Sustainability Report ("CSR Report")

Yes, we produce a stand-alone CSR Report and our CSR Report is publicly available

Yes, we include such reporting as part of our annual report

Yes, we maintain an interactive website that summarizes our CSR initiatives

Yes, while we don't maintain an interactive website that summarizes our CSR initiatives, we do include information regarding such initiatives on our website equivalent to that found in a CSR/EHS report.


Please provide the URL: [https://www.northwestern...](https://www.northwesternenergy.com)


Yes, and our reporting adheres to GRI Sustainability Reporting Guidelines


Yes, but we do not report on CSR initiatives in a CSR Report, rather our reporting is contained in a unique report

Title of the report: Community Report

Yes, and our reporting adheres to a set of standard reporting guidelines other than GRI (Please specify the reporting standard in the space provided)

 [Key Sustainability Statistics Report](#)

 [Community Report](#)

 [Environmental Stewardship: Our Commitment in Action](#)

*If CSR/EHS report is not explicitly GRI based, does the company use language that references GRI implying that its CSR/EHS report incorporates GRI elements: No

How often is your CSR Report or other report regarding your company's CSR initiatives produced:

Annually

Year of the company's FIRST report on corporate responsibility: 2016

Date of MOST RECENT report: 2020

Details on CSR Report audit or assurance:

We self-audit our CSR Report

Details on assurances and practices to ensure reporting quality of environmental data:
Our Community and Environmental Reports are reviewed by various members of our ESG committee to ensure the report is accurate.

Not applicable. Please provide explanations in the comment box below.

Not known

Additional Comments

NorthWestern's Community Report is published annually and our Environmental Report is published every two years. Our last Community Report was released in May 2020 and our last Environmental report was released December 2019

References:

 [Community Report and Environmental Report](#)

CSR and Board Committee

ISS Env & Soc QualityScore Number: 275

General Disclosures / Governance / CSR and Board Committee

Disclosure of how the highest governance body at NorthWestern Energy is established and structured in support of the company's purpose, and how this purpose, related to economic, environmental and social aspects, are evaluated and managed.

Frequency of the meeting:	Quarterly (+1 extra)
Reporting frequency:	Quarterly
Ratio of the sustainability investment comparing with the corporate revenue:	
The progress and achievements of the overall sustainable development:	
The improvement plan according to the overall sustainable development	
NorthWestern has announced an initiative to reduce its carbon emissions by 90% by 2045 (from 2010 levels).	
<input type="radio"/> Not applicable. Please provide explanations in the comment box below. <input type="radio"/> Not known	

Additional Comments

RatingID 275: The board discusses environmental, health and safety, and social matters at every board meeting; which are quarterly at a minimum, and on an as-needed basis.

Indep Committees

General Disclosures / Governance / Indep Committees

Details of different Board Committees independent of Executive Managers at NorthWestern Energy (e.g. Remuneration Committee, Audit Committee, Nomination Committee).

Name	Independent	Proportion of Independence	Committee Details
<input type="checkbox"/> Remuneration Committee			
<input checked="" type="checkbox"/> Audit Committee # ind. directors:3	Yes	Comprised of Independent Directors	The committee was comprised of 4 independent directors in the previous 5+ years. Q6: one is a financial expert, the others are financially literate Q31: 100% Q382: 100% MSCI: 100% of committee directors are independent Sustainalytics: 3 members, 100% are independent, one has financial expertise, and the other two are financially literate; there were 5 meetings held in 2020
<input checked="" type="checkbox"/> Nomination Committee # ind. directors:3	Yes	Comprised of Independent Directors	The committee was comprised of 4 independent directors in the previous 5+ years. Q19: 100%
<input type="checkbox"/> Sustainability	Yes		
<input checked="" type="checkbox"/> Compensation # ind. directors:3	Yes	Comprised of Independent Directors	The committee was comprised of 4 independent directors in the previous 5+ years. Q25: 100% Q380 & 381: 100% MSCI: 100% of committee directors are independent
<input type="checkbox"/> Information Security			
Other: Safety, Environmental, Operations and Technology Committee	Yes	Comprised of three Independent Directors	The committee was comprised of four independent directors in the previous 5+ years. RID 276 - yes RID 277: Yes RID 278: The committee is chaired by an independent board member and reports directly to the board of directors RID 279: the committee met four times in 2020 RID 280: all committee members attended every meeting. Q396: 100% Q403: 100%
Data publicly available: Is the company's data on different Board Committees that are independent from Executive Managers publicly available? Yes Link to disclosure: Proxy Materials (northwesternenergy.com)			
<input type="radio"/> Not applicable. Please provide explanations in the comment box below. <input type="radio"/> Not known			

Environmental Management System

Environmental / Other: Environmental / Environmental Management System

Provide details of the company's Environmental Management System.

EMS Attribute	Comment
<input checked="" type="checkbox"/> Managerial or board level responsibility for environmental issues NorthWestern Corporation Safety, Environmental, Technology, ... Environmental Policy	
<input checked="" type="checkbox"/> Identification of products, activities, and services that have significant impacts on the environment Environmental Policy	Key Provision #4 of NorthWestern's Environmental Policy

<input checked="" type="checkbox"/> Compliance with environmental regulation Environmental Policy	Key Provision #3 of NorthWestern's Environmental Policy
<input type="checkbox"/> Objectives, targets and deadlines	
<input checked="" type="checkbox"/> Environmental programmes Environmental Stewardship: Our Commitment in Action	
<input checked="" type="checkbox"/> Assigned roles and responsibilities Environmental Policy Page(s) 3	The Responsibilities Provision of the Environmental Policy specifies assigned roles and responsibilities.
<input checked="" type="checkbox"/> Training and awareness programmes for employees Environmental Policy	Onboarding and refresher Environmental awareness training required in the Environmental Policy is provided through NorthWestern's internal iLearn application.
<input checked="" type="checkbox"/> Internal and external communications on environmental management issues Environmental Policy Page(s) 2-3 Environmental Stewardship: Our Commitment in Action NorthWestern Corporation Safety, Environmental, Technology, ...	Management reporting responsibilities concerning environmental issues are described in the Environmental Policy. NorthWestern also publishes an Environmental Stewardship Report that is widely distributed and available on its website. Reports are also made quarterly to the Board of Directors.
<input checked="" type="checkbox"/> Monitoring and measurement Environmental Policy Page(s) 2 - 3	Environmental compliance events are reported through NorthWestern's Environmental Management Software System (Eco System). Work flow and corrective actions are monitored by internal management via the system reporting tools and automated escalation emails.
<input checked="" type="checkbox"/> Environmental performance records Environmental Policy	As described in the Environmental Policy, EcoSystem (the Environmental Management Software System) is the central repository for environmental records.
<input type="checkbox"/> External environmental audits	
<input checked="" type="checkbox"/> Internal environmental audits	Eco System, NorthWestern's Environmental Management Software System, is used to conduct periodic internal compliance audits.
<input checked="" type="checkbox"/> Corrective actions to stimulate continual improvement Environmental Policy	
<input type="checkbox"/> Externally certified (provide details of certifications at right)	

Additional Comments

NorthWestern's Environmental Management System is not certified however it is generally structured after the framework of ISO 14000 and 14001-2015.

Compensation Linkage

ISS Env & Soc QualityScore Number: 291; 293; 289; 286; 303

General Disclosures / Governance / Compensation Linkage

Linkage between compensation for members of the highest governance body, senior managers, and executives (including departure arrangements), and the organization's performance (including social and environmental performance).

	Financial	Environmental	Social	Corporate Governance
Senior management compensation	<input checked="" type="checkbox"/> linkage	<input type="checkbox"/> linkage	<input checked="" type="checkbox"/> linkage	<input type="checkbox"/> linkage
Executive compensation	<input checked="" type="checkbox"/> linkage	<input type="checkbox"/> linkage	<input checked="" type="checkbox"/> linkage	<input type="checkbox"/> linkage
Board member compensation	<input type="checkbox"/> linkage	<input type="checkbox"/> linkage	<input type="checkbox"/> linkage	<input type="checkbox"/> linkage
Data publicly available: Yes Link to disclosure: Proxy Materials (northwesternenergy.com)				
Please explain policies and programs related to compensation linkage and upload relevant documents:				
Please explain the level of disclosure on E&S performance measures for the short-term incentive plan for executives:				
Please explain the level of disclosure on E&S performance measures for any long-term incentive plan for executives granted in the last fiscal year:				
<input type="radio"/> Not applicable. Please provide explanations in the comment box below. <input type="radio"/> Not known				

Additional Comments

RID 291: NA
 RID 293: NA
 RID 289: NA
 RID 286: Yes
 RID 303: NA
 Q246: Performance measures can be found in the proxy statement - the link is included
 Q394: NA
 Q395: NA

References:

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Executive Compensation - Success Metrics and Vesting

ISS Env & Soc QualityScore Number: 290

General Disclosures / Governance / Executive Compensation - Success Metrics and Vesting

NorthWestern Energy 's pre-defined corporate indicators relevant for the variable compensation of executive/top management.

<input checked="" type="checkbox"/> Internal financial success metrics (e.g., cash flow, EBIT, revenues) Please specify: Net income, return on average equity, earnings per share growth <input checked="" type="checkbox"/> External financial success metrics (e.g., share price, Tobins Q) Please specify: Relative total shareholder return <input checked="" type="checkbox"/> External perception metrics (e.g., reputational risks, customer satisfaction, feedback from stakeholder engagement) Please specify: customer satisfaction, reliability <input type="checkbox"/> *Environmental metrics (e.g., corporate emission reduction) <input checked="" type="checkbox"/> *Social figures (e.g., corporate health & safety figure) Please specify: safety <input type="checkbox"/> *Governance (e.g., ethics)	
The longest performance period covered by your executive compensation plan (in years):	5
We do not have a clawback provision in place	
Time frame for variable payout of CEO compensation	% of total variable compensation
0-3 years	83
Longer than 3 years	17
Longest time vesting period for variable CEO compensation (in years):	5
<input type="checkbox"/> We do not have a performance based incentive system	
<input type="radio"/> Not applicable. Please provide explanations in the appropriate comment box below. <input type="radio"/> Not known	

References:


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Code of Conduct

ISS Env & Soc QualityScore Number: 250; 251; 252; 253; 254; 255; 256; 257; 264

Social / Other: Social / Code of Conduct

Details regarding formal policies or code of conduct/ethics for NorthWestern Energy .

Does your company maintain a stand-alone, company-wide written Code of Ethics and Business Conduct ("Code"): Yes, and the Code is publicly available  Code of Conduct and Ethics	
Policy issue	Company has formal policy
*Discrimination	<input checked="" type="checkbox"/>
*Corruption	<input type="checkbox"/>
Money laundering	<input type="checkbox"/>
*Facilitation payments (or restrictions and/or controls limiting facilitation payments)	<input type="checkbox"/>
*Whistle blowing guidelines	<input checked="" type="checkbox"/>
Anticompetitive/antitrust practices	<input type="checkbox"/>
Insider trading/dealing	<input checked="" type="checkbox"/>
Validity of financial information	<input type="checkbox"/>
*Bribes in any form, including kickbacks, on any portion of contract payments or soft dollar practices	<input checked="" type="checkbox"/>
No detriment to employees for refusing to pay or take bribes	<input type="checkbox"/>
Giving or receiving gifts	<input checked="" type="checkbox"/>
*Conflict of interest issues	<input checked="" type="checkbox"/>

Obeying relevant laws and regulations	<input checked="" type="checkbox"/>
Transparency on payments to (local) host governments	<input checked="" type="checkbox"/>
Code of Conduct Translation	
Does your company translate the Code into multiple languages: No, our company's employee base speaks one primary language and the Code is already in that language	
Details of Third Party Code	
Our company maintains a third party (e.g., supplier, agent, intermediary, reseller) Code of Conduct: No	
Is your Third Party Code translated into multiple languages? No	
Which of the following risk areas are included in the Third Party Code? <input type="checkbox"/> Conflicts of interest <input type="checkbox"/> Gifts and entertainment <input type="checkbox"/> Responsibility to report concerns to the company <input type="checkbox"/> Anti-bribery and corruption <input type="checkbox"/> Sustainability expectations <input type="checkbox"/> Labor laws and human rights <input type="checkbox"/> Protecting company confidential information <input type="checkbox"/> Workplace safety and health <input type="checkbox"/> Discrimination/harassment/bullying <input type="checkbox"/> Accurate records/company's right to audit <input type="checkbox"/> Conflict minerals, as relevant <input type="checkbox"/> Trade controls, as relevant <input type="checkbox"/> Reminder of the company's non-retaliation policy	
Bribery & Corruption Policy Attributes	Comment
<input type="checkbox"/> Prohibition of bribery	
<input type="checkbox"/> Definition of bribery or corruption	
<input type="checkbox"/> Prohibition and definition of conflicts of interest	
<input type="checkbox"/> Prohibition and definition of facilitation payments	
<input type="checkbox"/> Guidelines of what is considered acceptable behavior	
Data publicly available:	
Is the company's data regarding its formal policies or code of conduct/ethics is publicly available? Yes	
<input type="radio"/> Not applicable. Please provide explanations in the comment box below. <input type="radio"/> Not known	

References:


 [Code of Conduct and Ethics](#)

Manager Training

ISS Env & Soc QualityScore Number: 258

Social / Training and Education / Manager Training

Details on manager training on compliance and ethics.

Does your company provide targeted training to managers with direct reports (i.e., employees with supervisory responsibility) on their special responsibilities with regards to compliance and ethics: Yes, to all managers  Code of Conduct and Ethics
Select the following that applies to the manager training on compliance and ethics: Conducted as a part of new manager orientation (upon hire or promotion) Conducted on a periodic basis, at least every two years Content is reviewed and refreshed periodically, at least every two years Tracked for completion rates Completion is mandatory for all managers with direct reports
Select the following topics that are addressed by the manager training on compliance and ethics: Communicating ethics to subordinates, including expectations around frequency of communications Leveraging resources available to managers to support their communications regarding ethics and compliance topics Promoting a culture of compliance and ethics Incorporating ethics in business decision making Handling employee reports or concerns Understanding which types of concerns must be escalated so the company is aware of them Identifying and preventing retaliation Creating and maintaining an open door environment Conducting employment interviews Understanding techniques to ensure active listening to employee concerns
What percentage of your manager training is typically delivered in-person? 1-20 percent
<input type="radio"/> Not applicable. Please provide explanations in the comment box below. <input type="radio"/> Not known

Whistleblowing Programs

ISS Env & Soc QualityScore Number: 259; 261

Economic / Anti-Corruption / Whistleblowing Programs






Details on the company's "whistleblowing" programs.

Attributes of our whistleblower policy <input checked="" type="checkbox"/> Proactively communicated to employees <input type="checkbox"/> Available to suppliers, customers and other third parties <input checked="" type="checkbox"/> An independent, reporting hotline is available 24/7 <input checked="" type="checkbox"/> Possibility for anonymous reporting, and reports are treated confidentially <input checked="" type="checkbox"/> Non-retaliation policy <input checked="" type="checkbox"/> Structures in place to process whistleblower reports <input checked="" type="checkbox"/> Disclosure on the number of reports received, the types of misconduct and measures taken <input type="checkbox"/> Available in local languages
<input checked="" type="radio"/> Not applicable. Please provide explanations in the comment box below. <input type="radio"/> Not known

Additional Comments

We don't have a whistleblower policy per se, but we have a code of conduct and business ethics and other processes which cover this area.

References:

-  [Anti-Fraud Policy](#)
-  [Code of Conduct Internal Investigation Policy](#)
-  [Code of Ethics for CEO and Sr Financial Officers](#)
-  [Code of Conduct and Ethics](#)
-  [Supplier Code of Conduct](#)

Corruption Prevention

Economic / Anti-Corruption / Corruption Prevention










Details on whether NorthWestern Energy has developed and implemented a mechanism or means to prevent corruption.

Anti-corruption policy or objective:	
It is the objective of this policy to promote ethical organizational behavior by providing guidelines to employees regarding appropriate relationships, including accepting or giving gifts that may cause a conflict between an employee's personal interest and his or her job performance or the company's interests.	
Details of the system to counter corruption (e.g. reporting violations, regular internal/ external anti-corruption audit, training, supplier and contractor assessment, etc)	
The progress and achievements of the system:	
Improvement plan according to the progress and achievements:	
Total number and percentage (%) of training hours for employees, representatives, contractors and suppliers about corruption:	
Employee and representatives training hours:	1
% of employees and representatives:	100
Contractor training hours:	0
% of contractors:	0
Supplier training hours:	0
% of suppliers:	0
<input type="radio"/>	Not applicable. Please provide explanations in the comment box below.
<input type="radio"/>	Not known

Additional Comments

NorthWestern's company policies, including Conflict of Interest, Antitrust and Code of Conduct and Ethics, provides direction so that all of us, at all times, in any situation, and in every location, can do the right thing. Our Code is organized around our SERVICE values of Safety, Excellence, Respect, Value, Integrity, Community and Environment and support our core commitments. However, policies and training cannot address every possible situation. If employees have a question or concern, we encourage them to visit with a supervisor. NorthWestern Energy's leaders at all levels are responsible both for their own actions and for fostering an ethical and inclusive culture. Employees may also contact Human Resources, the Chief Audit and Compliance Officer or our compliance line administered by a third party.

References:

-  [Anti-Fraud Policy](#)
-  [Code of Conduct Internal Investigation Policy](#)
-  [Code of Ethics for CEO and Sr Financial Officers](#)
-  [Complaint Procedure for Audit Committee of Board](#)
-  [Conflicts of Interest and Gifts Policy](#)
-  [Corporate Political Contributions Policy](#)
-  [Code of Conduct and Ethics](#)
-  [Supplier Code of Conduct](#)
-  [Antitrust Policy](#)

Taxes Paid

Economic / Tax / Taxes Paid

Please provide the total sum of taxes of all types paid broken down by country.

Currency:	US Dollars	2020	2019	2018	2017
Home country:					
United States of America		185,619,518	183,524,758	179,679,425	168,009,774
Total Taxes Paid:		185,619,518	183,524,758	179,679,425	168,009,774
Data publicly available:					
Yes					
Link to disclosure: See link below for Most Recent FERC Form 1. Historical FERC Form 1 reports are also available for years 2017-2019 on NorthWestern's website.					
<input type="radio"/> Not applicable. Please provide explanations in the comment box below.					
<input type="radio"/> Not known					

Additional Comments

Taxes include Payroll, Use/sales taxes, Gross Receipts, Property, Energy, Regulatory, Income and other taxes.

References:

 [2020 FERC Financial Report \(FORM No. 1\)](#) Page(s) 262 & 262.1

Country-by-Country Reporting GRI 207-4

ISS Env & Soc QualityScore Number: 486; 487; 488; 489; 490; 491

Economic / Tax / Country-by-Country Reporting GRI 207-4

Tax reporting for each tax jurisdiction

Country-by-Country Reporting	Jurisdiction	Names of resident entities	Primary activities	Number of employees	Basis of calculation	Revenue from third-party sales	Revenues from intra-group transactions with other tax jurisdictions	Profit/loss before tax	Tangible assets other than cash and cash equivalents	Corporate income tax paid on a cash basis	Corporate income tax accrued on profit/loss	Reasons for difference between income tax accrued on profit/loss and tax due if statutory tax rate is applied	Time period covered
													Start Date End Date
Country-by-Country Additional Reporting	Jurisdiction	Total employee remuneration	Taxes withheld and paid on behalf of employees	Taxes collected from customers	Industry related and other taxes or payments to governments	Significant uncertain tax positions	Balance of intra-company debt held by entities in the jurisdiction	Basis of calculation of interest paid on the debt					

Reason for Omission:

Not Applicable

Why considered not applicable:

NorthWestern Corporation is incorporated in the United States of America (Delaware). If of its operations in the USA, Other than a very small immaterial natural gas transmission pipeline that extends into Canada, all of NorthWestern Corporation's operations and customers are located in the USA. All financial information can be found in our Annual Report or FERC Form 1 report.

Political Donations

ISS Env & Soc QualityScore Number: 267; 268; 269; 270; 271; 272

Social / Other: Social / Political Donations

Information on the company's code of conduct or policy that addresses political donations. Please upload this code or policy and select all that apply below.

<input type="checkbox"/> The company does not have such a code or policy	
<input checked="" type="checkbox"/> The policy covers both direct and indirect political donations	
<input type="checkbox"/> The company's code or policy is publicly disclosed	
<input checked="" type="checkbox"/> The policy or code prohibits donations to political parties	
<input checked="" type="checkbox"/> Political donations permitted when clear authorization and disclosure procedures are met	
<input type="checkbox"/> Political donations are publicly disclosed at:	
<input type="checkbox"/> Disclosure of taxes / royalties paid to governments	
<input type="checkbox"/> †Disclosure of the amount of corporate contributions undertaken	
<input type="checkbox"/> †Disclosure of the amount of corporate contributions undertaken include 'soft money' contributions	
<input type="checkbox"/> †Policy addresses contributions to 527 organizations	
<input type="checkbox"/> †Company sponsors a Political Action Committee	
<input type="checkbox"/> †Company discloses involvement in government lobbying	
Political Involvement Policy Attributes	Comment
<input type="checkbox"/> Prohibits political involvement of any kind on the company's behalf	
<input type="checkbox"/> Partially prohibits political involvement	
<input type="checkbox"/> Approved by senior management	
<input type="checkbox"/> Commits the company to disclose political donations and/or lobbying expenditures	
<input type="radio"/> Not applicable. Please provide explanations in the comment box below.	
<input type="radio"/> Not known	

References:

 [Corporate Political Contributions Policy](#)

 [Code of Conduct and Ethics](#)

Approach to Stakeholder Engagement GRI 102-43

ISS Env & Soc QualityScore Number: 402; 403

General Disclosures / Stakeholder Engagement / Approach to Stakeholder Engagement GRI 102-43

Organization's approach to stakeholder engagement, including frequency of engagement by type and by stakeholder group, and an indication of whether any of the engagement was undertaken specifically as part of the report preparation process.

Stakeholder Type / Stakeholder Group	Frequency of engagement	Approach	Portion of engagement undertaken as part of the report preparation process
Customer Vision Stakeholder Group	varied	A collaborative process to provide a forum for understanding stakeholder perspective of the utility of the future. We intend this effort to lead to real outcomes that benefit our customers and the communities we serve.	
Demand Side Management Stakeholder Group	varied	Discuss re-envisioning of the electric DSM programs offered by NWE for the 2020-2021 program year (items to be discussed include branding, methods of marketing, cost-effectiveness calculations, and energy savings estimates). The group shall make recommendations to NorthWestern for consideration in the development of the 2020-2021 electric DSM program offerings.	
Electric Technical Advisory Committee	varied	The Electric Technical Advisory Committee advises NorthWestern Energy in the preparation of its electric biennial Resource Procurement Plan.	
Green Power Stakeholder Advisory Group	varied	The Green Power Stakeholder Advisory Group has been formed to advise NorthWestern Energy in its review of the current Efficiency Plus (E+) Green Program and consideration of options for a new renewable energy product tariff.	
<input type="checkbox"/> No stakeholder engagement approach			

Additional Comments

Stakeholder engagement is very important to us. We work with local, state and federal agencies as well as affected non-governmental organizations, consumer advocates and concerned citizens to develop collaborative solutions to a variety of issues.

References:

 [Stakeholder Engagement](#)