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Contact Point for Questions Regarding the Report GRI 102-53

Sustainalytics Number: Contact

General Disclosures / Reporting Practice / Contact Point for Questions Regarding the Report GRI 102-53

Contact point for questions regarding the report or its contents.

Name:	Tory Payne
Title:	Corporate Financial Analyst
Mailing Address:	NorthWestern Energy 3010 South 69th Street Sioux Falls, SD 57106
Phone:	605-978-2851
Email:	tory.payne@northwestern.com

Additional Comments

Optional contact: Travis Meyer at 605-978-2967 or travis.meyer@northwestern.com. Physical mailing address is the same as above.

Board Industry Experience

Sustainalytics Number: CG.1.1

General Disclosures / Governance / Board Industry Experience

Number of board members with relevant work experience in the company's sector according to GICS Level 1 sector classification, excluding executive members and employee representatives.

Number of independent or non-executive members with industry experience (e.g., excludes executives):	5
Please list the independent or non-executive directors included in the above count: Tony Clark, Britt Ide, Linda Sullivan, Mahvash Yazdi, Jeff Yingling	
Attach up to five (5) public URLs indicating where this information is available in your public reporting or corporate website. 2021 Proxy Statement Page(s) 49	
Please select one of the following options. (Required) <input checked="" type="radio"/> We do report this information and have completed the table above. <input type="radio"/> We do not report this information. <input type="radio"/> Not applicable. Please provide explanations in the appropriate comment box below. <input type="radio"/> Not known	

Board Support and Responsiveness

Sustainalytics Number: CG.1.2

General Disclosures / Governance / Board Support and Responsiveness

Describe details of board failure to implement a shareholder resolution, response to low vote support for a management proposal, or low support or approval rate for directors. Attach public references as needed.	
None	
Lowest percentage of vote support received by management-nominated directors at most recent annual meeting:	83.19
Describe details of board members' service on other boards, including governance controversies and performance failures at other companies. Attach public references as needed.	
Other boards our directors are members of can be found in their individual biographies in the proxy on pages 50-53. There are no known governance controversies or performance failures at other companies.	

Additional Comments

Q49: None
 Q99: NA
 Q312: None
 Q345: No
 Q350: NA
 Q383: 83.19%

References:

 [2021 Proxy Statement](#) Page(s) 50-53

Board Capture

Sustainalytics Number: CG.1.3

General Disclosures / Governance / Board Capture

Seeks to identify board experience and level of independence

Identify board experience and level of independence

Northwestern's longest tenured director has been on the board for more than 12 years and our two shortest tenured directors have been on the board for less than two years. Only two of our directors have been on our board for more than ten years. None of our board members serve on other boards together and none of our executives serve on any boards related to our directors.

References:

 [2021 Proxy Statement](#) Page(s) pp. 49-53

Material Related-Party Transactions (RPTs)

Sustainalytics Number: CG.1.6

General Disclosures / Governance / Material Related-Party Transactions (RPTs)

Publicly available details of material related-party transactions (RPTs) at NorthWestern Energy

Percent of directors involved in material related-party transactions:	0
Information on whether directors with related-party transactions sit on key board committees.	
Information regarding director or CEO involvement in material related-party transactions. Attach publicly available supporting references as needed.	
Information regarding related-party transactions with significant shareholders.	

Additional Comments

Q50: 0%
 Q51: NA
 Q216: No

Stock Ownership

Sustainalytics Number: CG.1.7

General Disclosures / Governance / Stock Ownership

Publicly available information regarding stock options and ownership for executives and directors at NorthWestern Energy .

Describe holding or retention period for stock options as well as for restricted shares/stock awards for executives:	
The Company does not grant stock options.	
Directors are subject to stock ownership guidelines:	
Yes	Link to disclosure: https://www.northwestern...
What are the pricing conditions for stock options granted to executives?	
Proportion of directors with more than one year of service who own stock:	100
Information regarding pledging of company shares by any executive or director	
We are aware of no pledging of company shares. Our insider trading policy prohibits pledging of company shares.	

Additional Comments


Q134/135: There is an expected stock ownership level for executives based on position that must be maintained while in that position at the Company.

Q143: Yes. Directors are subject to stock ownership guidelines.

Q144: 100% of directors own stock

Q243: No

References:

 [Corporate Governance Guidelines](#) Page(s) 6

 [2021 Proxy Statement](#) Page(s) 63

Executive/Board Misconduct

Sustainalytics Number: CG.1.8

General Disclosures / Governance / Executive/Board Misconduct

Seeks to identify Executive or Board misconduct

Identify Executive or Board Misconduct

None.

Business Practices Controversies

Sustainalytics Number: CG.1.9

General Disclosures / Governance / Business Practices Controversies

Seeks to identify any business practices controversies

Identify any business practices controversies

None

Controversies Summary

Sustainalytics Number: CG.1.10

Management Approach / Controversies Summary

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

Controversy Category	Last Updated	Status	Headline	Source

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.

Engagement and Responsiveness to Shareholders

Sustainalytics Number: CG.1.11

General Disclosures / Governance / Engagement and Responsiveness to Shareholders

Describe company engagement with shareholders and responsiveness to shareholder concerns.

Details and range of company engagement with shareholders and responsiveness to shareholder concerns

In 2020, NorthWestern had over 1,200 interactions with 154 unique firms representing holders of over \$1 billion of NorthWestern's stock. These efforts included establishing a communication channel with the stewardship teams and portfolio managers / analysts of NorthWestern's top 25 stockholders.

We have received two shareholder proposals in the last 12 years. We engaged with each of these shareholders in an attempt to address their concerns. We were able to reach an agreement with the first shareholder to publicly provide the requested environmental information, without the need for a shareholder vote. We were unable to reach an agreement with the second shareholder, and a federal district court did not require us to include the second proposal in our proxy statement.

In the last several years, our shareholders have supported all management proposals with at least 90% approval.

We have received two shareholder proposals in the last 17 years. We engaged with each of these shareholders in an attempt to address their concerns. We were able to reach an agreement with the first shareholder to publicly provide the requested environmental information, without the need for a shareholder vote. We were unable to reach an agreement with the second shareholder, and a federal district court did not require us to include the second proposal in our proxy statement. In the last several years, our shareholders have supported all management proposals with at least 90% approval.

Chair of the Highest Governance Body GRI 102-23

Sustainalytics Number: CG.2.1

General Disclosures / Governance / Chair of the Highest Governance Body GRI 102-23

Whether the chair of the highest governance body is also an executive officer in the organization.

<input checked="" type="radio"/> Roles of Chairman and Chief Executive (or their equivalents) are separate. <input type="radio"/> Role of CEO and Chairman is split and former CEO-Chairman is now Chairman. <input type="radio"/> Role of CEO and Chairman is split and chairman is non-executive but not independent. <input type="radio"/> Role of CEO and Chairman is split and former CEO-Chairman is now Chairman, and an independent lead director is appointed. <input type="radio"/> Role of Chairman and CEO is joint. <input type="radio"/> Role of Chairman and CEO is joint, and an independent lead director is appointed.
If an independent lead director is appointed (split or joint), please indicate name:
The company has a presiding director in its Board of Directors: No
<input checked="" type="radio"/> Chairman is non-executive and independent <input type="radio"/> Chairman is an executive director
If chairman is non-executive and independent, indicate when this approach was adopted: 17 years ago
Data Publicly Available: Yes

Additional Comments

RID14 and MSCI: The Board Chair is independent

References:

 [2021 Proxy Statement](#) Page(s) 47

Board Age/Tenure

Sustainalytics Number: CG.2.2

General Disclosures / Governance / Board Age/Tenure

Age and tenure information on the Board of Directors

Board Age Limit:	NA
Average Age:	59.25
We use the following tenure limiting mechanisms to control which independent directors are on the board: Term limits	
How many directors have been on your company's Board for more than 17 years? None	
Data publicly available: Yes Link to disclosure: https://northwesternenerg...	

Nominating and Selecting the Highest Governance Body GRI 102-24



Sustainalytics Number: CG.2.4

General Disclosures / Governance / Nominating and Selecting the Highest Governance Body GRI 102-24

Nomination and selection processes for the highest governance body and its committees and the criteria used for nominating and selecting highest governance body members.

Our Board of Directors is elected by shareholders for one-year terms; each director is up for election by shareholders at each annual meeting. Generally, we have nominated our existing directors for additional one-year terms. If we need to add a new director due to retirements or other reasons, the Nominating and Governance Committee of our Board of Directors will conduct a search for candidates who meet our specific needs of skills, qualifications, and characteristics. We consider diversity, independence, experience, and other factors in our search. We have occasionally increased the size of our Board of Directors to add a new director for an abbreviated term until the next annual meeting of shareholders, at which time the director's nomination is voted on by shareholders. This process and the factors we consider are disclosed in our proxy statement and our charter for the Nominating and Governance Committee

References:

 2021 Proxy Statement	Page(s) 54-55
 Nominating and Governance Committee Charter	Page(s) 3-8

Director Biographies

Sustainalytics Number: CG.2.5

General Disclosures / Governance / Director Biographies

Does NorthWestern Energy publish biographies of the members of the Board of Directors?

Board member biographies are published: Yes

Additional Comments

Board member biographies are published in the proxy statement, which is available on the Company's public website: Proxy Materials (northwesternenergy.com)

References:

 2021 Proxy Statement	Page(s) 50-53
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Board Effectiveness

Sustainalytics Number: CG.2.6; CG.3.1

General Disclosures / Governance / Board Effectiveness

Effectiveness of the board of directors and the alignment with the (long-term) interests of shareholders.

	Indicators/measures
*Total number of corporate board meetings held in the past year:	5
Details of Directors participation in annual shareholder meetings:	<input type="checkbox"/> All directors of our company's Board are required to attend the company's annual shareholder meeting <input checked="" type="checkbox"/> Independent directors are encouraged to attend the company's annual shareholder meeting, but it is not a requirement <input checked="" type="checkbox"/> One or more of the independent directors of our company's Board makes themselves available for questions from shareholders <input type="checkbox"/> Not applicable, as our company does not have shareholders meetings <input type="checkbox"/> None of the above

<p>Number of meetings attended in percentage last business/fiscal year. Attach up to five (5) public URLs indicating where this information is available in your public reporting or corporate website.</p> <p>2021 Proxy StatementPage(s) 48, 49</p>	<p>Average board meeting attendance (%) for all board of directors / supervisory board members: 100</p>
	<p>Minimum of attendance required for all members, at least (in %): 0</p>
	<p>*% of board meetings attended by independent directors during the latest period: 100</p>
<p>*Number of directors that attended less than 75% of board meetings held as of the date of the last filing:</p>	0
<p>Attendance over two year period:</p>	<p><input checked="" type="radio"/> All directors attended at least 75 percent of Board and committee meetings for the period for which they served</p> <p><input type="radio"/> One director did not attend at least 75 percent of his or her Board and committee meetings for the period for which they served</p> <p><input type="radio"/> More than one director did not attend at least 75 percent of the aggregate of their Board and committee meetings for the period for which they served</p> <p><input type="radio"/> Organization does not track the attendance of directors</p>
<p>Number of non-executive/independent directors with 4 or less other mandates:</p>	<p>7</p> <p>Please provide the names of these directors. Dana Dykhouse, Tony Clark, Jan Horsfall, Britt Ide, Linda Sullivan, Mahvash Yazdi, Jeff Yingling</p>
<p>Number of other mandates for non-executive/independent directors all directors restricted to:</p>	
<p>Performance assessment of board of directors/ supervisory board members. Attach up to five (5) public URLs indicating where this information is available in your public reporting or corporate website.</p>	<p><input checked="" type="checkbox"/> Regular self-assessment of board performance, please specify or provide supporting documents: This information is not public</p> <p><input type="checkbox"/> Regular independent assessment of board performance, please specify or provide supporting documents:</p>
<p>Election of board members. Attach up to five (5) public URLs indicating where this information is available in your public reporting or corporate website.</p> <p>2021 Proxy StatementPage(s) 6, 7</p>	<p><input checked="" type="checkbox"/> Board members are elected and re-elected on an annual basis</p> <p><input checked="" type="checkbox"/> Board members are elected individually (as opposed to elected by slate)</p>
<p>Description of Board election process:</p>	<p><input type="radio"/> Directors are elected only if they receive a majority of the shares voting or present at the meeting; the Board does NOT have the discretion to accept or decline offers of resignation from directors who fail to secure a majority vote</p> <p><input checked="" type="radio"/> Directors are elected only if they receive a majority of the shares voting or present at the meeting; however, the Board has the discretion to accept or decline offers of resignation from directors who fail to secure a majority vote</p> <p><input type="radio"/> Directors are elected if they receive a "plurality vote" – they only need to get more votes than a competing candidate</p>
<p>Data publicly available:</p> <p>Yes</p> <p>Link to disclosure:Proxy Materials (northwesternenergy.com)</p>	
<p>Please select one of the following options. (Required)</p> <p><input checked="" type="radio"/> We do report this information and have completed the table above.</p> <p><input type="radio"/> We do not report this information.</p> <p><input type="radio"/> Not applicable. Please provide explanations in the appropriate comment box below.</p> <p><input type="radio"/> Not known</p>	

Shareholder Board Candidates

Sustainalytics Number: CG.2.7

General Disclosures / Governance / Shareholder Board Candidates

Ability for shareholders to submit candidates for the board

1.10 Can long-term shareholders submit their own independent director candidates for consideration on the company's proxy card (commonly known as "proxy access")? Please select all that apply.

- Yes, a group of shareholders owning more than three percent of company shares for some specified length of time can nominate independent directors, whose names will appear on company proxy ballots
- Yes, a group of shareholders owning more than five percent of company shares for some specified length of time can nominate independent directors, whose names will appear on company proxy ballots
- Yes, but the group of shareholders aggregating their shares to satisfy the ownership percentage requirement may not consist of more than ten shareholders
- Yes, but the group of shareholders aggregating their shares to satisfy the ownership percentage requirement may not consist of more than 20 shareholders
- No, shareholders wishing to nominate their own directors may not access the company's ballot
- Proxy access does not apply to our company because of the rules or procedures governing the exchange(s) where our company's stock is listed
- Other

Shareholder Meeting & Voting

Sustainalytics Number: CG.2.7; CG.3.7

General Disclosures / Governance / Shareholder Meeting & Voting

Publicly available information regarding shareholder voting standards as well as most recent annual meeting at NorthWestern Energy

Please check all that apply and attach publicly available supporting references as necessary:	
<input checked="" type="checkbox"/>	Majority vote standard in uncontested elections
<input type="checkbox"/>	Outstanding votes controlled by shares with enhanced voting rights
<input type="checkbox"/>	Directors on the board who are not up for election by all classes of common shareholders
<input type="checkbox"/>	Supermajority vote required to approve amendments to the charter or bylaws
<input checked="" type="checkbox"/>	Supermajority vote required to approve mergers or business combinations
If the company has a majority voting standard, is there a plurality carve-out in the case of contested elections?	
No	
Provide details and attach publicly available supporting references as necessary	
Percentage of vote support for the CEO at the most recent annual meeting:	99.8
Percentage of vote support for the Board Chair at the latest meeting:	83.2
Percentage of vote support for environmental or social shareholder resolutions at the most recent annual meeting:	
Has the company employed a show of hands at the last general meeting?	

Additional Comments

There were no environmental or social shareholder resolutions at the most recent annual meeting.

Effectiveness of Risk Management Process GRI 102-30

Sustainalytics Number: CG.2.8

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.

Governance Structure GRI 102-18

Sustainalytics Number: CG.2.8; CG.4.2

General Disclosures / Governance / Governance Structure GRI 102-18

Governance structure of the organization, including committees of the highest governance body and committees responsible for the decision-making on economic, environmental, and social topics.

Committee Function	Name of Committee	Formal Board Responsibility?	Number of Executive Directors	Number of Non-Executive Directors (NEDs)	Number of connected NEDs	Committee chairperson is independent
<input checked="" type="checkbox"/> Audit/Accounting	Audit Committee	<input checked="" type="checkbox"/>	0	3	0	<input checked="" type="radio"/> Yes <input type="radio"/> No
<input checked="" type="checkbox"/> Remuneration/ Compensation	Human Resources Committee	<input checked="" type="checkbox"/>	0	3	0	<input checked="" type="radio"/> Yes <input type="radio"/> No
<input checked="" type="checkbox"/> Nomination	Nominating and Governance Committee	<input checked="" type="checkbox"/>	0	3	0	<input checked="" type="radio"/> Yes <input type="radio"/> No
<input checked="" type="checkbox"/> Worldwide Labor Policies and Practices	Human Resources Committee	<input type="checkbox"/>	0	3	0	
<input checked="" type="checkbox"/> Human Rights Issues	Human Resources Committee	<input type="checkbox"/>	0	3	0	
<input checked="" type="checkbox"/> Diversity and Employment Equity	Human Resources Committee	<input checked="" type="checkbox"/>	0	3	0	
<input checked="" type="checkbox"/> Supply Chain Social Responsibility	Safety, Environmental, Technology and Operations Committee	<input type="checkbox"/>	0	3	0	
<input checked="" type="checkbox"/> Corp. Social Responsibility, Corp. Citizenship, Sustainable Development	Safety, Environmental, Technology and Operations Committee, Governance Committee, Board of Directors	<input checked="" type="checkbox"/>	0	3	0	
<input checked="" type="checkbox"/> Health and Safety	Safety, Environmental, Technology and Operations Committee	<input checked="" type="checkbox"/>	0	3	0	
<input checked="" type="checkbox"/> Environmental Issues	Safety, Environmental, Technology and Operations Committee	<input checked="" type="checkbox"/>	0	3	0	
<input checked="" type="checkbox"/> Risk Management	Audit Committee, Board of Directors	<input checked="" type="checkbox"/>	0	3	0	
<input checked="" type="checkbox"/> Ethics Issues	Audit Committee, Nominating and Governance Committee; Board of Directors	<input checked="" type="checkbox"/>	0	3	0	
<input checked="" type="checkbox"/> Political Involvement	Nominating and Governance Committee	<input checked="" type="checkbox"/>	0	3	0	
<input checked="" type="checkbox"/> Customer Service and Quality	Safety, Environmental, Technology and Operations Committee	<input checked="" type="checkbox"/>	0	3	0	
<input checked="" type="checkbox"/> Community and Public Relations	Nominating and Governance Committee	<input checked="" type="checkbox"/>	0	3	0	
<input checked="" type="checkbox"/> Charitable Giving	Nominating and Governance Committee	<input type="checkbox"/>	0	3	0	
Is the company's governance structure data publicly available? Yes Link to Corporate Governance disclosure: northwesternenergy.com ; Proxy Materials northwesternenergy.com						

Additional Comments

Bloomberg
- Committee were composed of 4 NEDs from 2013-2020; 2021 the committee size became 3 NEDs
- All committees and committee chairs are NEDs

ISS
Q23: The chair of the Nominating and Governance Committee is an Independent NED
Q27: There are no executives on the Human Resources Committee
Q28: The chair of the Human Resources Committee is an Independent NED
Q33: There are no executives on the Audit Committee
Q34: The chair of the Audit Committee is an Independent NED
Q306: There are no executives on the Nominating and Governance Committee

Board Diversity

Sustainalytics Number: CG.2.9

General Disclosures / Governance / Board Diversity

Total board seats occupied by women (as compared to men). Committee chairs occupied by women (as compared to men).

G1. Board Diversity	Number of women	Total	Percentage of positions held by women
G1-A: Total Board seats occupied by women	3	8	0.38
G1-B: Committee Chairs occupied by women	2	4	0.5

Shareholder Votes

Sustainalytics Number: CG.3.2; CG.3.3; CG.3.5

General Disclosures / Governance / Shareholder Votes

Information on voting shares for NorthWestern Energy and if classes of stock have equal voting rights (i.e., is one share entitled to one vote) follows.

Company has a dual or multiple class(es) of shares with unequal/restricted voting rights	No Explain: We do not have dual or multiple classes of shares.
Company classes of stock have equal voting rights	Yes Explain: We only have one class of stock
Controlling shareholder	No
Ownership structure deviates from one share, one vote	No
Company has failed to adopt majority voting standards	No
Does the company make its data on voting shares and voting rights publicly available? Yes Link to disclosure: https://northwesternenerg...	

Ownership and Legal Form GRI 102-5

Sustainalytics Number: CG.3.3

General Disclosures / Organizational Profile / Ownership and Legal Form GRI 102-5

Nature of ownership and legal form.

Registrant Name: NORTHWESTERN CORP
Doing Business as: NorthWestern Energy
Form of Ownership: Corporation
State of Incorporation: Delaware
Publicly Owned
Common Stock is traded on Nasdaq under the ticker symbol "NWE"

References:

 [NORTHWESTERN CORP 2020 10K](#)

Page(s) 1

Capital-Related and Liquidity-Related Risks



Sustainalytics Number: CG.3.4

Leadership & Governance / Systemic Risk Management / Capital-Related and Liquidity-Related Risks

Description of approach to managing capital- and liquidity-related risks associated with systemic non-insurance activities

Approach to managing capital- and liquidity-related risks associated with systemic non-insurance activities
See the "Liquidity and Capital Resources" section of NorthWestern's Annual 10-K and Quarterly 10-Q.

References:

 NORTHWESTERN CORP 2020 10K	Page(s) 48
 NorthWestern Corp. 2020 Annual Report	Page(s) 31

Shareholder Rights & Restrictions

Sustainalytics Number: CG.3.5

General Disclosures / Governance / Shareholder Rights & Restrictions

Publicly available information regarding provisions or standards that enhance or restrict shareholder rights at NorthWestern Energy .

Shareholders may act by written consent
No
Please indicate which of the following apply:
<input type="checkbox"/> Company has an exclusive venue or forum provision
<input type="checkbox"/> Board may modify company's equity structure without shareholder approval
<input type="checkbox"/> Company has a fee-shifting provision
<input type="checkbox"/> Company has a representative claim litigation or other significant litigation rights
Has the company entered into a private placement in the past year without an accompanying share purchase plan (SPP)?
What is the dilution limit of the general mandate to issue shares? What is the discount limit of the general mandate to issue shares?

Poison Pill Plan

Sustainalytics Number: CG.3.6

General Disclosures / Governance / Poison Pill Plan

Details on the poison pill plan at NorthWestern Energy

Company does not have a poison pill plan
<input type="checkbox"/> Approved by shareholders
<input type="checkbox"/> Poison pill plan has a (TIDE) Three-Year Independent Director Evaluation provision
<input type="checkbox"/> Poison pill plan has a sunset provision
<input type="checkbox"/> Poison pill is designed to preserve tax assets (NOL pill)
<input type="checkbox"/> Poison pill has a modified slow-hand or dead-hand provision
<input type="checkbox"/> Poison pill plan has a qualified offer clause
Poison pill expiration date
Date when poison pill was implemented or renewed:
% threshold of shares outstanding for the company's poison pill to trigger:
Data publicly available: Yes Link to disclosure: https://northwesternenerg...

Compensation Report

Sustainalytics Number: CG.4.1; CG.4.5

General Disclosures / Governance / Compensation Report

Details on transparency of senior management remuneration at NorthWestern Energy .

Company communicates the remuneration/compensation of its board of directors/supervisory board members and other highest paid directors/senior executives (e.g. CEO) externally: Yes, on individual level for each board member and CEO and additional highest paid senior executives https://northwesternenerg...	
Executive officers eligible for multi-year guaranteed bonuses	None
NEOs paid a guaranteed bonus in the most recent fiscal year or guaranteed a bonus in the future	None
What is the aggregate level of stock ownership of the officers and directors as a percentage of shares outstanding?	
Is there a cap on the CEO's annual bonus?	
Is there a cap on executives', excluding the CEO, annual bonus?	
What percentage of the annual bonus for the CEO is or can be deferred?	
What percentage of the annual bonus for executives, excluding the CEO, is or can be deferred?	
Ratio of CEO's non-performance-based compensation to base salary:	1
Ratio of CEO's total compensation to the next highest paid executive:	2.37
Size of the CEO's 1-year pay as a multiple of the median pay for the company's peers (MOM):	.72
Degree of alignment between the company's TSR and change in CEO pay over the past five years (PTA):	Unknown
Average outside directors' total compensation as a multiple of the peer median:	Unknown
Degree of alignment between the company's annualized 3-year pay percentile rank, relative to peers, and its 3-year annualized TSR rank, relative to peers (RDA):	26.67
<input checked="" type="checkbox"/> Company employs at least one metric that compares its performance to a benchmark or peer group (relative performance)	

Say On Pay Provision

Sustainalytics Number: CG.4.3

General Disclosures / Governance / Say On Pay Provision

Details on a say on pay provision at NorthWestern Energy .

Company has a say on pay provision Frequency of Say on Pay votes as ratified by shareholders in years as of the date of the last filing: Annually	
Data publicly available:	Yes
Link to disclosure:	https://northwesternenerg...
If relevant, vote record of Say on Pay provision at most recent shareholder meeting.	
Votes For	45,660,562
Votes Against	622,452

Pay Controversies

Sustainalytics Number: CG.4.4

General Disclosures / Governance / Pay Controversies

Seeks to identify any pay controversies

Identify any pay controversies

None

Long-Term Incentives for Employees

Sustainalytics Number: CG.4.6

Social / Employment / Long-Term Incentives for Employees

Details on whether NorthWestern Energy provides long-term incentives (beyond one year performance period) for employees below the senior management level (i.e. maximum two levels away from the CEO or any equivalent position).

Please briefly describe 1) the long-term incentive program (e.g. stock options, restricted stock units, cash incentives, etc.); and 2) the type of employees the program applies to. Please provide supporting evidence	Our long-term incentives for employees below the senior management level are on average paid out after:	% workforce below senior management level (max. two levels from the CEO) that this program applies to:	Explanation of whether long-term incentives include targets associated with sustainability performance
We do offer a long term incentive program in the form of restricted stock below senior management level to a limited group of senior leadership.	3 years	3.2	Sustainability performance is not a factor
Please select one of the following options. (Required) <input checked="" type="radio"/> Yes, we offer long-term incentive programs for employees below the senior management level, and have completed the table above. <input type="radio"/> No, we do not offer long-term incentive programs for employees below the senior management level. <input type="radio"/> Not applicable. Please provide explanations in the appropriate comment box below <input type="radio"/> Not known			

CEO Compensation - Long-Term Performance Alignment

Sustainalytics Number: CG.4.6

General Disclosures / Governance / CEO Compensation - Long-Term Performance Alignment

Does your company have the following compensation structures in place to align with long-term performance? Please indicate where this information is available in your **public reporting** or **corporate website**.

Please attach up to five (5) public URLs to indicate where this information is available in your public reporting or corporate website. 	
Deferral of Bonus for Short-term CEO Compensation	
Percentage of the short-term bonus deferred in the form of shares. 0	
Performance Period for Variable CEO Compensation	
Please attach up to five (5) references indicating where this information is available in your public reporting or corporate website. 	
Longest performance period covered by your executive compensation plan, in years. 5	
We have a clawback provision in place. No	
Time Vesting for Variable CEO Compensation	
Please attach up to five (5) references indicating where this information is available in your public reporting or corporate website. 	
Longest time vesting period for variable CEO compensation 5	
Please select one of the following options. (Required)	
<input checked="" type="radio"/> Yes, our company has guidelines on deferred bonus, time vesting, and performance period for the CEO's variable compensation, and we have completed the table above. <input type="radio"/> No, we do not have a performance-based variable compensation system. <input type="radio"/> Not applicable. Please provide explanations in the appropriate comment box below. <input type="radio"/> Not known	

References:

[2021 Proxy Statement](#) Page(s) 14-36

CEO Pay Ratio

Sustainalytics Number: CG.4.7; CG.4.11

Social / Employment / CEO Pay Ratio

The ratio of the company's CEO to average full time employee compensation. Does NorthWestern Energy report this in regulatory filings?

S1. CEO Pay Ratio. Use your Reporting Currency.	
CEO Compensation (including salary + cash bonus + value of equity awarded) in the last reporting year	3,102,048
Median Compensation of Full-Time Employee in the last reporting year	125,303
S1-A: Median Compensation of Full-Time Employee/CEO Compensation	24.76
S1-B: Does the company report this metric in regulatory filings?	Yes

References:

[2021 Proxy Statement](#) Page(s) 5

Remuneration Policies GRI 102-35

Sustainalytics Number: CG.4.8; CG.4.9; CG.4.10

General Disclosures / Governance / Remuneration Policies GRI 102-35

Remuneration policies for the highest governance body and senior executives by type of remuneration.

REMUNERATION TYPE	DETAILS
Fixed pay and variable pay:	
<input checked="" type="checkbox"/> Performance-based pay <input checked="" type="checkbox"/> Equity-based pay <input checked="" type="checkbox"/> Bonuses <input checked="" type="checkbox"/> Deferred or vested shares	Pay components for executives include: Base Salary, Annual Cash Incentive (performance metrics include: financial, safety, reliability and customer satisfaction), Performance Unit Awards under the Long-Term Incentive Program (LTIP) (performance units based on company financial performance), and Restricted Share Grants under the Executive Retirement/Retention Program (ERRP) ((share grants based on company performance)
<input type="checkbox"/> Sign-on bonuses or recruitment incentive payments	
<input type="checkbox"/> Termination payments	
<input type="checkbox"/> Clawbacks	
<input checked="" type="checkbox"/> Retirement benefits	The company closed its pension plans to new participants in 2008. As a result, all but one of our executives participate in our pension plan. The company does not maintain a non-performance-based supplemental retirement plan for executives; however we do provide a performance-based executive retention and retirement program, which provides annual performance-based equity grants to executives that vest over a five year period, and if vested, are available to executives only following a separation from service (i.e., retirement).
How performance criteria in the remuneration policy relate to the CEO and senior executives' economic, environmental and social objectives:	

References:

 [2021 Proxy Statement](#) Page(s) 14-36

Golden Parachute Agreements

Sustainalytics Number: CG.4.9; CG.4.10

General Disclosures / Governance / Golden Parachute Agreements

Details on whether NorthWestern Energy has any change of control benefits/severance benefits/golden parachute agreements in place for any of its executives, as of the fiscal year end wherever available, otherwise as of the date of the latest filing.

<p>Details of any Change-of-Control or Severance Benefits/Golden Parachute Agreements</p> <p>NorthWestern does not (a) have any change-in-control agreements, golden parachute agreements, or severance agreements and (b) provide excise tax gross-ups for change-in-control payments (2021 Proxy Statement p. 16). NorthWestern's equity compensation plan provides Board discretion to accelerate the vesting of awards or provide cash or other consideration in exchange for the satisfaction and cancellation of outstanding awards (2021 Proxy Statement, p. 92). NorthWestern has a Key Employee Severance Plan (2021 Proxy Statement, p. 42) which does not provide for change-in-control payments, but does provide severance benefits upon an involuntary termination without cause. Those severance benefits include 2x base pay plus 2x targeted annual cash incentive plus the interrupted annual bonus prorated to end of month of separation of service based on actual performance, along with COBRA premiums for 24 months and outplacement services for 12 months.</p>
<p>Data publicly available:</p> <p>Yes</p> <p>Link to disclosure: https://www.sec.gov/Archi...</p>

References:

 [2021 Proxy Statement](#) Page(s) 16, 42, 92

Median Compensation

Sustainalytics Number: CG.4.11

General Disclosures / Governance / Median Compensation

The annual compensation for the chief executive officer of NorthWestern Energy and the median of the annual compensation of all other NorthWestern Energy employees, as well as the ratio between the two.

Currency: US Dollars		
The total annual compensation of the chief executive officer, or any equivalent position:	3102048	
Total number of full-time employees:	1530	
Total payroll costs:	164,162,908	
Employee Compensation	Median Employee Compensation	Mean Employee Compensation
Median or mean annual compensation of all employees, except the Chief Executive Officer (or any equivalent position)	125303	107296
Ratio of the total annual compensation of the Chief Executive Officer to the annual mean or median employee compensation	24.76	28.91
Data is publicly disclosed: Yes Link to disclosure:2021 Proxy Statement (pp. 24-25)		

References:

 [2021 Proxy Statement](#) Page(s) 24-25

Clawback Provision for Executive Compensation

Sustainalytics Number: CG.4.12

General Disclosures / Governance / Clawback Provision for Executive Compensation

Details on whether the company has any compensation clawback provisions in place as of the fiscal year end wherever available, otherwise as of the date of the latest filing.

Details on any compensation clawback provisions in place as of the fiscal year end wherever available, otherwise as of the date of the latest filing:
The Company does not currently have a clawback policy, however, any awards distributed are subject to a future clawback policy, should one be put in place.
Data publicly available: Yes Link to disclosure: https://northwesternenerg...

Additional Comments

Q155, MSCI, Sustainalytics: The company does not have a clawback policy in place

Indep Committees

Sustainalytics Number: CG.5.1; CG.5.2; CG.6.1

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)			

Audit Fees

Sustainalytics Number: CG.5.3

General Disclosures / Governance / Audit Fees

Details on audit and non-audit related fees paid by NorthWestern Energy .

Currency unit:	USD				
	2020	2019	2018	2017	
Audit fees:	1324114	1349114	1418264	1382084	
Audit-related fees:					
Non-audit-related fees, excluding tax services:					
Total audit fees (amount):	1324114	1349114	1418264	1382084	

References:

 [2021 Proxy Statement](#) Page(s) 8

Auditor Ratification and Employment

Sustainalytics Number: CG.5.4; CG.5.5

General Disclosures / Ethics and Integrity / Auditor Ratification and Employment

Details on auditor ratification and employment at NorthWestern Energy .

Ratification Details of the Auditor in recent shareholder meeting:	
Auditor has been ratified in the recent shareholder meeting	
Link to disclosure: https://www.sec.gov/ix?do...	
Number of years the auditor has been employed:	20
Auditor ratification votes at most recent shareholder meeting.	
Votes For	47,746,606
Votes Against	153,193

Audit Details

Sustainalytics Number: CG.5.6

General Disclosures / Governance / Audit Details

Details regarding accounting audits and findings at NorthWestern Energy

Independent Auditor:	Deloitte
Qualified auditor opinion, most recent reporting period	No Please Explain The opinion wasn't qualified.
Accounting investigations in last two years	No
Material weakness in internal controls	No
Restatements or special charges in last two years	No
Late Filings	No
Auditor has issued an adverse opinion in the past year	No
Report Disclosed	Yes Please Explain Audit report is disclosed in 10-K

CSR and Board Committee

Sustainalytics Number: CG.6.1

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).	

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.

Compensation Linkage

Sustainalytics Number: CG.6.5

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:				
Please explain the performance period for the latest active long-term incentive plan or the proposed plan for executives:				

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:

 [2021 Proxy Statement](#) Page(s) 14-35

Political Donations

Sustainalytics Number: CG.6.6

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	

References:

-  [Corporate Political Contributions Policy](#)
-  [Code of Conduct and Ethics](#)

Political Contribution GRI 415-1

Sustainalytics Number: CG.6.7

Social / Public Policy / Political Contribution GRI 415-1

Total value of political contributions by country and recipient/beneficiary

Reporting Currency:	2020	2019	2018	2017
Recipient:				
Country:				
Data publicly available:				

Reason for Omission:

Not Applicable

Why considered not applicable:

Additional Comments

NorthWestern Energy does not make direct or indirect contributions to candidates for political office, political parties or committees, or political committees, organized for the advancement of political candidates, whether federal, state or local.

References:

-  [Corporate Political Contributions Policy](#)

Page(s) 2

Contributions & Other Spending

Sustainalytics Number: CG.6.7

Economic / Other: Economic / Contributions & Other Spending

Annual total monetary contributions to and spending for political campaigns, political organizations, lobbyists or lobbying organizations, trade associations and other tax-exempt groups. PAC contributions by employees should not be included.

Itemized Figures		FY 2017	FY 2018	FY 2019	FY 2020
Attach up to five (5) references.					
Lobbying, interest representation or similar		118235	66000	107903	66000
Local, regional or national political campaigns / candidates		0	0	0	0
Trade associations or tax-exempt groups (e.g. think tanks)		484191	492772	512021	529025
Other (e.g. spending related to ballot measures or referendums)		0	0	0	0
Total contributions and other spending	Use your Reporting Currency				
Data coverage (as % of denominator)	Percentage of:				
Total Figures Only					
Attach up to five (5) references.					
Lobbying, interest representation or similar	Included				
Local, regional or national political campaigns / candidates	No contribution				
Trade associations or tax-exempt groups (e.g. think tanks)	Included				
Other (e.g. spending related to ballot measures or referendums)	No contribution				
		FY 2017	FY 2018	FY 2019	FY 2020
Total contributions and other spending	Use your Reporting Currency				
Data coverage (as % of denominator)	Percentage of:				
Please select one of the following options. (Required)					
<input checked="" type="radio"/> We are able to itemize the figures, and have completed the "Itemized Figures" table above.					
<input type="radio"/> We can only report the total spending figures, and have completed the "Total Figures Only" table above.					
<input type="radio"/> We do not track our annual monetary contributions and other spending for political and related purposes.					
<input type="radio"/> Not applicable. Please provide explanations in the appropriate comment box below.					
<input type="radio"/> Not known					

Additional Comments

We do not make direct or indirect contributions to candidates for political office, political parties or committees, or political committees organized for the advancement of political candidates, whether federal, state, or local. We do reflect internal lobbying costs. In Montana, the legislature meets every other year; the legislatures in South Dakota and Nebraska meet annually.

References:

-  [Community Works Fund](#)
-  [Corporate Political Contributions Policy](#)

Corruption & Bribery

Sustainalytics Number: CG.6.8

General Disclosures / Ethics and Integrity / Corruption & Bribery

Aspects covered by the company's anti-corruption and bribery policy at a group level (including subsidiaries).

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

- Bribes in any form (including kickbacks) on any portion of contract payments or soft dollar practices
- Direct or indirect political contributions
- Political contributions publicly disclosed. Please attach supporting reference using the corresponding paperclip icon below.
- Charitable contributions and sponsorship
- Charitable contributions and sponsorship publicly disclosed. Please attach supporting reference using the corresponding paperclip icon below.

If you ticked "Political contributions publicly disclosed" above, please indicate public web address here.

 [Corporate Political Contributions Policy](#) Page(s) All

If you ticked "Charitable contributions and sponsorship publicly disclosed" above, please indicate public web address here.

 [Key Sustainability Statistics Report](#) Page(s) 6-7

Please select one of the following options. (Required)

- Yes, our group-wide anti-corruption and bribery policy is publicly available, and we have completed the table above.
- No anti-corruption & bribery policy.
- Not applicable. Please provide explanations in the appropriate comment box below.
- Not known

Additional Comments

We have a Code of Conduct and Ethics and a Supplier Code of Conduct which each prohibit bribery by company employees and our suppliers.

References:

 [Code of Conduct and Ethics](#) Page(s) 22

 [Supplier Code of Conduct](#) Page(s) 7

Bribery, Corruption and Business Ethics








Sustainalytics Number: CG.6.8

General Disclosures / Ethics and Integrity / Bribery, Corruption and Business Ethics

Details of the company's programs on bribery, corruption and business ethics.

Bribery and Corruption Program <ul style="list-style-type: none"><input checked="" type="checkbox"/> Managerial responsibility for bribery and corruption<input checked="" type="checkbox"/> Regular bribery and corruption risk assessments<input checked="" type="checkbox"/> Operating guidelines addressing record keeping, approval procedures and appropriate behaviour<input checked="" type="checkbox"/> Annual signoff of the policy on bribery and corruption by employees<input checked="" type="checkbox"/> Regular training on bribery and corruption<input checked="" type="checkbox"/> Internal monitoring system to detect corruption<input checked="" type="checkbox"/> Mechanisms for employees to consult on ethical issues
Business Ethics Program <ul style="list-style-type: none"><input checked="" type="checkbox"/> Commitment to address major business ethics risks<input checked="" type="checkbox"/> Board responsibility for business ethics issues<input checked="" type="checkbox"/> Managerial responsibility for business ethics<input checked="" type="checkbox"/> Ethical risk assessments<input checked="" type="checkbox"/> Operating guidelines<input checked="" type="checkbox"/> Annual training of employees on the Code of Conduct<input checked="" type="checkbox"/> Measures to deter non-compliance and reduce exposure to unethical opportunities<input checked="" type="checkbox"/> Incident investigation and corrective actions

References:


 Code of Conduct and Ethics	Page(s) All
 Supplier Code of Conduct	Page(s) All
 https://www.northwesternenergy.com/docs/default-source/default-source/defau...	Page(s) All
 Auditing and Accounting Complaints Policy	Page(s) All
 Anti-Fraud Policy	Page(s) All
 Code of Conduct Internal Investigation Policy	Page(s) All
 Conflicts of Interest and Gifts Policy	Page(s) All

Tax Strategy and Governance

Sustainalytics Number: CG.6.13

Economic / Tax / Tax Strategy and Governance

Details on whether NorthWestern Energy has a publicly available and group-wide tax policy, strategy or principles in place which indicate your approach towards taxation.

<p>Please provide the relevant weblink to your publicly available tax policy. Up to three (3) references are allowed.</p> <div style="border: 1px solid #ccc; padding: 5px; margin-bottom: 10px;"> NorthWestern Corp. 2020 Annual Report Page(s) 54</div>
<p>Our tax policy covers the following elements:</p> <ul style="list-style-type: none"><input checked="" type="checkbox"/> A commitment to compliance with the letter as well as the spirit of the tax laws and regulations in the countries in which the company operates<input checked="" type="checkbox"/> A commitment not to transfer value created to low tax jurisdictions<input checked="" type="checkbox"/> A commitment not to use tax structures without commercial substance<input checked="" type="checkbox"/> A commitment to undertake transfer pricing using the arm's length principle<input checked="" type="checkbox"/> A commitment not to use secrecy jurisdictions or so-called "tax havens" for tax avoidance<input checked="" type="checkbox"/> An approval process of the tax policy by the board of directors
<p>Please select one of the following options. (Required)</p> <ul style="list-style-type: none"><input checked="" type="radio"/> Yes, we have a publicly available, group-wide tax policy in place, and have completed the table above.<input type="radio"/> No, we do not have a publicly available and group-wide tax policy.<input type="radio"/> Not applicable. Please provide explanations in the appropriate comment box below.<input type="radio"/> Not known

Tax Reporting

Sustainalytics Number: CG.6.13

Economic / Tax / Tax Reporting

Details on the public reporting of key business, financial and tax information by country in which the company operates.

Please attach up to five (5) references with the weblink for information regarding your company's public reporting on key business, financial and tax information for regions or countries in which you operate. If your company publicly reports both country and regional data, please answer at the country level.

-  [2020 FERC Financial Report \(FORM No. 1\)](#) Page(s) Various
-  [NorthWestern Corp. 2020 Annual Report](#) Page(s) Various

We publicly report on the following for each tax jurisdiction in which we operate:

- Names of all the resident entities
- Primary activities
- Number of employees
- Revenue
- Profit (Loss) before tax
- Income tax accrued (Current year)
- Income tax paid

Please select one of the following options. (Required)

- We publicly report tax-related metrics for each tax jurisdiction in which we operate, and have completed the table above.
- No, we do not report on tax related metrics on a tax jurisdiction basis.
- Not applicable. Please provide explanations in the appropriate comment box below.
- Not known

Additional Comments

Our operations are located within the United States of America, so all taxes reported / paid are in one country. [Note: We do have one very immaterial investment in a natural gas pipeline that partially resides in Canada. This represents approximately \$4 million "investment in subsidiaries" of our total \$2.1 billion equity balance (or < 0.2%).]

Non-Discrimination

Sustainalytics Number: CG.6.14

Social / Non-Discrimination / Non-Discrimination



Does NorthWestern Energy follow a sexual harassment and/or a non-discrimination policy?

S6. Non-Discrimination

S6-A: Does the company follow a sexual harassment and/or a non-discrimination policy?

Yes

References:

-  [Human Rights Policy](#) Page(s) 2
-  [Code of Conduct and Ethics](#) Page(s) 16

Supplier Implementation

Sustainalytics Number: CG.6.15

Social / Supplier Social Assessment / Supplier Implementation

Details on whether NorthWestern Energy monitors its suppliers'/contractors' implementation of and compliance with social/ethical standards.

Program for monitoring suppliers'/contractors' suppliers'/contractor': No Please Explain: We have provided supplier code of conduct to our largest vendors, smaller vendors are in process
Monitors compliance of suppliers'/contractors in non-OECD countries: No Please Explain: We do not have a monitoring program in place yet
Monitors compliance of suppliers'/contractors with local law: No Please Explain: We would respond if notified

References:


 [Supplier Code of Conduct](#)

Emissions Reduction Targets

Sustainalytics Number: CG.6.17

Environmental / Emissions / Emissions Reduction Targets

Please provide data in the following table and where possible indicate NorthWestern Energy 's reduction targets and explain the trend and performance against the target.

Indicator	Unit of analysis or other if different	FY2020	FY2019	FY2018	FY2017	Quantitative reduction target for FY2020:	
Total direct GHG emissions	<input type="checkbox"/> Metric tonnes CO2 <input type="checkbox"/> Other unit						C2
Total energy consumption	<input type="checkbox"/> Giga Joules <input type="checkbox"/> Other unit						
Total water use	<input type="checkbox"/> Cubic meters (m3) <input type="checkbox"/> Other unit						C4
Total waste generated	<input type="checkbox"/> Metric tonnes <input type="checkbox"/> Other unit						C5
Program Attribute	Comment						
<input checked="" type="checkbox"/> Policy commitment to reduce GHG emissions  NorthWestern Corp. 2020 Annual Report Page(s) 2	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. Since these commitments are recent, NorthWestern will track progress going forward.						
<input type="checkbox"/> Managerial responsibility for GHG emissions							
<input type="checkbox"/> Initiatives to reduce GHG emissions							
<input type="checkbox"/> GHG reduction targets and deadlines							

<input checked="" type="checkbox"/> GHG emissions monitoring and measurement Key Sustainability Statistics Report EEI/ESG Sustainability Document	<p>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.</p> <p>Direct CO2 emissions associated with NorthWestern's electricity supply portfolios and vehicle fleet are included in the Key Sustainability Statistics Report.</p>					
<input type="checkbox"/> Regular GHG audits or verification						
<input type="checkbox"/> No such data collected						

C2

Direct emissions are reported in the Key Sustainability Statistics Report.
 Also see EEI ESG/Sustainability Report and the AGA ESG Report located on NorthWestern's website.

C4

Total water use is reported in the Key Sustainability Statistics Report.

C5

Wastes generated at NorthWestern owned facilities are tracked and reported in the Key Sustainability Statistics Report.

References:

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

Environmental Procurement

Sustainalytics Number: CG.6.18

Environmental / Materials / Environmental Procurement

Description of the company's environmental procurement guidelines or policy.

Percentage of operations covered by environmental procurement policy: 100	
Description:	
Policy Attribute	Comment
<input checked="" type="checkbox"/> Policy addressing process related requirements	NorthWestern is in the process of developing Sustainable Purchasing and Practices Guidelines.
<input type="checkbox"/> Policy addressing product related requirements	
<input checked="" type="checkbox"/> Policy or initiatives addressing office products	
<input type="checkbox"/> Engagement with suppliers to improve environmental performance	

Additional Comments



NorthWestern is in the process of developing Sustainable Purchasing and Practices Guidelines. A standing committee made up of various employees from a cross section of the company has been established to steward this initiative. The Guidelines will be put in place in Q4 2021.

Corporate Environmental Policy Areas

Sustainalytics Number: E.1.1

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.

<p>Is the company's environmental management policy publicly available?</p> <p>Link to publicly available policy:</p> <p> Environmental Policy</p>	
<p>Policy commitments:</p>	<p>Comment</p>
<p><input checked="" type="checkbox"/> Commitment to environmental protection</p> <p> Environmental Policy</p>	<p>NorthWestern's Environmental Policy reflects a commitment to environmental stewardship and compliance.</p>
<p><input checked="" type="checkbox"/> Commitment to create environmental awareness</p>	<p>Under the Training Provision of the Environmental Policy, all employees are provided environmental and stewardship awareness training.</p>
<p><input checked="" type="checkbox"/> Commitment to implement an environmental management system</p>	<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>
<p><input checked="" type="checkbox"/> Commitment to use natural resources or energy more efficiently</p>	<p>The Provisions of the Environmental Policy describe NorthWestern's commitment to the efficient use of natural resources and energy.</p>
<p><input checked="" type="checkbox"/> Commitment to reduce emissions, releases and waste</p>	<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>
<p><input checked="" type="checkbox"/> Commitment to monitor the company's environmental performance</p> <p> NorthWestern Corporation Safety, Environmental, Technology, ...</p>	<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>
<p><input checked="" type="checkbox"/> Commitment to report regularly on environmental issues</p> <p> NorthWestern Corporation Safety, Environmental, Technology, ...</p>	<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>
<p><input type="checkbox"/> Commitment to consult with stakeholders on environmental issues</p> <p> Missouri-Madison Protection, Mitigation and Enhancement Prog...</p>	<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>
<p><input checked="" type="checkbox"/> Approved by senior management or the board of directors</p>	<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		
Policy addresses:		
<input checked="" type="checkbox"/> Greenhouse gases		
<input type="checkbox"/> Other emissions		
<input checked="" type="checkbox"/> Energy use/conservation		
<input type="checkbox"/> Water use/conservation		
Policy provides commitments to:		
<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		

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](#)

Environmental Policy

Sustainalytics Number: E.1.1; CG.6.10

Environmental / Environmental Compliance / Environmental Policy

Details on whether NorthWestern Energy has an environmental policy, whether standalone or integrated into a broader policy statement, follow.

<input checked="" type="checkbox"/> Company has a group-wide environmental policy. <input type="checkbox"/> Company does not have a group-wide environmental policy.	
Environmental Policy Detail	Comment
<input checked="" type="checkbox"/> Commitment to environmental protection	NorthWestern's Environmental Policy reflects a commitment to environmental stewardship and compliance.
<input checked="" type="checkbox"/> Commitment to create environmental awareness	Under the Training Provision of the Environmental Policy, all employees are provided environmental and stewardship awareness training.
<input checked="" type="checkbox"/> Commitment to implement an environmental management system	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.
<input checked="" type="checkbox"/> Commitment to use natural resources or energy more efficiently	The Provisions of the Environmental Policy describe NorthWestern's commitment to the efficient use of natural resources and energy.
<input checked="" type="checkbox"/> Commitment to reduce emissions, releases and waste	The Provisions of the Environmental Policy describe NorthWestern's commitment to supporting non-carbon emitting energy sources for our customers and minimizing waste.
<input checked="" type="checkbox"/> Commitment to monitor the company's environmental performance NorthWestern Corporation Safety, Environmental, Technology, ...	The Board of Directors monitors the company's environmental performance. In addition, the Environmental Policy stipulates that environmental incidents will be tracked and reported.
<input checked="" type="checkbox"/> Commitment to report regularly on environmental issues NorthWestern Corporation Safety, Environmental, Technology, ...	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.
<input type="checkbox"/> Commitment to consult with stakeholders on environmental issues Missouri-Madison Protection, Mitigation and Enhancement Prog...	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.
<input checked="" type="checkbox"/> Approved by senior management or the board of directors	The Environmental Policy is approved by multiple layers of management including the President and CEO.


References:

 [Environmental Policy](#)

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 	
<input type="checkbox"/> Externally certified (provide details of certifications at right)	

Additional Comments

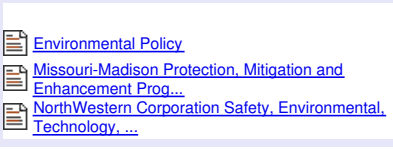

NorthWestern's Environmental Management System is not certified however it is generally structured after the framework of ISO 14000 and 14001-2015.













Biodiversity Program

Sustainalytics Number: E.1.2.1


Environmental / Biodiversity / Biodiversity Program

Please indicate whether NorthWestern Energy has a formal policy, action plan, or programs to reduce impact on land and/or biodiversity/wildlife. Please provide supporting documentation. If plan is under development, please indicate date it will be in place.

<input type="checkbox"/> Company does not have a biodiversity policy or action plan, but will have one by:	Date:
<input checked="" type="checkbox"/> Company has had a biodiversity policy or action plan since:	Date: July 1, 2017
*Company publicly discloses the presence of land conservation programs:	Yes Please NorthWestern's Protection, Mitigation and Enhancement Program for its hydroelectric projects includes several projects to specify: enhance habitats or conserve lands. Description of PM&E Projects are publicly available at https://www.northwesternenergy.com
*Company publicly discloses the presence of a Biodiversity Program:	Yes Link to disclosure: https://www.northwesternenergy.com
<input type="checkbox"/> The company has a policy to source natural resources from suppliers with an operating biodiversity policy or certification scheme	Timber sourcing: % of products certified: Agricultural sourcing: % of products certified: Fish sourcing: % of products certified:
<input checked="" type="checkbox"/> The company carries out local biodiversity enhancement projects or funds local biodiversity action	Details: NorthWestern funds biodiversity enhancement projects through its Missouri-Madison FERC Project 2188 Protection, Mitigation and Enhancement Programs. All PM&E Projects are publicly available at Our Environment (northwesternenergy.com).
Program Attributes	Comment
<input checked="" type="checkbox"/> Managerial or board level responsibility for biodiversity issues 	Responsibility for environmental compliance, including biodiversity is described in our Environmental Policy.
<input checked="" type="checkbox"/> Identification of biodiversity priority areas 	Priority areas for protection, mitigation or enhancement projects are identified through an annual collaborative process with the Technical Advisory Committees (TACs). The TACs are made up of biologists and other technical experts from resource agencies and NorthWestern.
<input type="checkbox"/> Biodiversity management plans for priority areas	

<input type="checkbox"/> Systematic consideration of local threats to biodiversity beyond the company's business activities 	
<input type="checkbox"/> Implementation of best-practice mitigation hierarchy 	
<input type="checkbox"/> Targets and deadlines related to biodiversity 	
<input checked="" type="checkbox"/> Engagement with local residents or biodiversity experts 	<p>Protection, mitigation or enhancement projects are identified through a collaborative process with the Technical Advisory Groups who provide technical advise and guidance on the Protection, Mitigation and Enhancement Program. The annual TAC meetings are open to local residents or other stakeholders interested in the projects.</p>
<input checked="" type="checkbox"/> Reporting on biodiversity programs or impacts 	<p>Reports are prepared annually on PM&E projects and posted on the NorthWestern Energy website Our Environment (northwesternenergy.com)</p>
<input type="checkbox"/> Formal policy commitment to avoid operating in areas with the highest biodiversity value 	
<input type="checkbox"/> Formal commitment to 'no net loss' or having a 'net positive impact' on biodiversity 	
<input checked="" type="checkbox"/> Formal commitment to minimize impact on biodiversity or to consider biodiversity in planning  Environmental Policy 	<p>The Environmental Policy includes principles that NorthWestern is to be good stewards of the environment and that environmental concerns be considered in business planning and decision making.</p>
<input type="checkbox"/> Framework for minimizing impacts in High Conservation Value (HCV) areas 	
<input type="checkbox"/> Framework for minimizing impacts in High Conservation Value (HCV) areas includes references to external standards or guidelines 	
<input type="checkbox"/> Framework for minimizing impacts in High Conservation Value (HCV) areas describes a formal process for evaluating projects 	

References:

 [Missouri-Madison Protection, Mitigation and Enhancement Prog...](#)

EMS

Sustainalytics Number: E.1.2; E.1.3

Environmental / Other: Environmental / EMS




Please indicate whether NorthWestern Energy has implemented an Environmental Management System (EMS). Please upload a full description of the company's EMS, including managerial structure, responsibility and procedures, and number of employees in environmental management positions. If NorthWestern Energy does not have an EMS, please upload a full description of any systems in place for managing environmental issues. Select all that apply to the company's EMS below.

Are there formal policies in place to address environmental impact? Formal policies are in place to address environmental impact (air emissions, water discharges and waste)	
Description of the company's EMS (check all that apply): <input type="checkbox"/> Company has not implemented an EMS <input checked="" type="checkbox"/> Applies worldwide <input type="checkbox"/> Applies in non-OECD† countries <input type="checkbox"/> Has no internal audits <input type="checkbox"/> Contains specific goals and objectives <input type="checkbox"/> Has management incentives <input type="checkbox"/> Has publicly disclosed external audits certified by third party <input checked="" type="checkbox"/> Includes an environmental policy <input checked="" type="checkbox"/> Staff training and awareness measures <input type="checkbox"/> Conducts periodic management reviews of the EMS <input checked="" type="checkbox"/> Applies to a percentage of company's activities Please specify: 100%	
List the business units to which EMS applies:	EMS applies to all of NorthWestern's business units including Energy Supply and Electric and Gas Transmission and Distribution.
*Climate change is integrated into business strategy:	Yes See NorthWestern's 2020 Supplement to the 2019 Electric Energy Supply Resource Plan. 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. Since these commitments are recent, NorthWestern will track progress going forward.
Incentives are given to employees for meeting company energy conservation goals:	No
Publicly disclose the presence of an Environmental Management System:	Yes Link to disclosure(s): NorthWestern's EMS is described generally in its Environmental Policy
Percentage of sites with hazardous waste guidance that achieved HAZWOPER certification or follow ISO 14001:	0%
Publicly disclose the percentage of sites with HAZWOPER certification or ISO 14001:	No
Extent to which a strategy is established to reduce any supply chain toxic release footprint:	

Additional Comments

NorthWestern's Environmental Management System generally reflects the framework of an effective environmental program as described in ISO 14000 and 14001-2015.

References:

-  [2020 Supplement to the 2019 Electric Supply Resource Procure...](#)
-  [Environmental Policy](#)
-  [NorthWestern Corp. 2020 Annual Report](#)

Page(s) 2

Air Emission Reduction

Sustainalytics Number: E.1.3.3

Environmental / Emissions / Air Emission Reduction

The following targets and programs are in place to reduce air emissions.


<input type="checkbox"/> Corporate-wide program with targets and measuring plan <input type="checkbox"/> Involves management incentives <input type="checkbox"/> Includes employee training
Percent of operations covered by program(s):
Description of program(s) to reduce air emissions:

Global Totals by Year

Sustainalytics Number: E.1.3.3

Environmental / Emissions / Global Totals by Year



Global totals of capacity, production, emissions, and emissions intensity for all countries included in NorthWestern Energy 's CDP response.

Year ending	Nameplate capacity (MW)	Production (GWh)	Absolute emissions (metric tonnes CO2e)	Emissions intensity (metric tonnes CO2e/MWh)	C1
Current reporting year					C2
Historical reporting year					C3
Forecasted reporting year					C4
Program Attributes	Comment				
<input checked="" type="checkbox"/> Commitment to reduce air emissions 	<p>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.</p> <p>NorthWestern has also committed to further reducing the carbon intensity of our electric generation in Montana by 90%, compared to 2010 levels, by 2045.</p>				
<input type="checkbox"/> Identification of relevant air emissions					
<input type="checkbox"/> Initiatives to reduce air emissions					
<input type="checkbox"/> Targets to reduce air emissions					
<input type="checkbox"/> Deadlines to reduce air emissions					

<input checked="" type="checkbox"/> Air emissions monitoring Key Sustainability Statistics Report	<p>NorthWestern Energy tracks and reports air emissions associated with its owned fossil fueled power plants individually as required by applicable air quality permits. This information is publicly available from the relevant permitting authority. NorthWestern currently reports emissions of GHGs, NOx, SOx, and Hg for owned (including jointly owned facilities) and purchased power on the EEI/ESG Sustainability form, which can be found on its corporate website at www.northwesternenergy.com.</p> <p>NorthWestern does not currently report, in a single location, emissions of CO, PM10 and VOCs from its energy supply portfolios or the percentages of emissions near areas of dense population but is in the process of developing an emissions database for its portfolios which will be posted to its website and included in its Key Sustainability Statistics Report.</p>			
--	--	--	--	--

- C1 See referenced documents below.
- C2 See referenced documents below.
- C3 See referenced documents below.
- C4 See referenced documents below.

References:

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

Water Reduction

Sustainalytics Number: E.1.3.4

Environmental / Water / Water Reduction

What measures is NorthWestern Energy taking to reduce water consumption or increase efficiency of water use? Are there any quantifiable objectives and have there been any improvements with respect to water use? Please describe, and upload relevant documentation.

Measures taken to reduce water consumption or increase efficiency of water use:	
Details on company's use of alternative water sources	
Percentage of water consumption from alternative water sources (i.e. grey water, rainwater, sewage):	
*Specific objectives and expected date of attainment:	
Improvements with respect to water use, and implemented measures:	
<input type="checkbox"/> These measures are tied to the following policy, strategy, plan:	
Data publicly available: The company's data on their measures to reduce water consumption or increase efficiency of water use is publicly available:	
Program Attributes	Comment
<input type="checkbox"/> Policy commitment to reduce water use	
<input type="checkbox"/> Managerial responsibility for water use	
<input type="checkbox"/> Initiatives to reduce fresh water use	
<input type="checkbox"/> Water reduction targets and deadlines	
<input type="checkbox"/> Water use monitoring and measurement	
<input type="checkbox"/> Water use reporting	

Additional Comments

No policies or procedures currently in place but potential policies and procedures to reduce water consumption will be evaluated.

CO2e Intensity

Sustainalytics Number: E.1.9; E.1.10

Environmental / Emissions / CO2e Intensity

Details on CO2e intensity as a management KPI at NorthWestern Energy follow:

	Unit of Data/Dimension	Indicator Value for Most Recent Financial Year	
Carbon Intensity KPI	Metric Tons / MWh	0.417	Comment on carbon intensity trend: NorthWestern Energy commits to a 90% reduction to the carbon intensity of our electric energy portfolio for Montana by 2045 (as compared with our 2010 baseline carbon intensity of 1.12 metric tons of CO2 / MWh)
<input type="checkbox"/> Carbon Intensity is not used as a management KPI. Please explain in Additional Comments			

Additional Comments

References:

-  [Our Vision For Montana](#) Page(s) 2
-  [EEI/ESG Sustainability Document](#) Page(s) 5

Intensity Targets

Sustainalytics Number: E.1.9; E.1.10

Environmental / Emissions / Intensity Targets

Details of intensity targets for NorthWestern Energy follow:

ID	Scope	% of emissions in scope	% reduction from base year	Metric	Base year	Start year	Normalized base year emissions (metric tonnes CO2e)	Target year	Science-based target	% achieved (emissions)	Target status	Please explain	% change anticipated in absolute Scope 1+2 emissions	% change anticipated in absolute Scope 3 emissions	
	Scope 1	71	90	metric tonnes CO2e per megawatt hour (MWh)*	2010	2019		2045	No, and we do not anticipate setting one in the next 2 years	55	Underway	The 2010 Baseline intensity of the Montana owned and long-term contracted resources used to serve our Montana customers was 1.01 MT/MWh. In 2019, the intensity was .45 MT/MWh which is about a 55% reduction. The 2010 Baseline intensity can be found on NorthWestern's website on the ESG Sustainability page in the Our Vision for Montana document which is also referenced below.	90		C2



C2

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.

Additional Comments




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:

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

Supplier Environmental Programs

Please provide NorthWestern Energy 's targets and programs for environmental improvement by suppliers.

Program Attribute	Comment
<input checked="" type="checkbox"/> Company-wide managerial responsibility for environmental management of suppliers  Environmental Policy  Supplier Code of Conduct	See Environmental Policy and Supplier Code of Conduct
<input type="checkbox"/> Systematic consideration of suppliers' environmental performance during procurement	Sustainable Procurement and Practices Guidelines being developed. Anticipated adoption Q4 2021.
<input checked="" type="checkbox"/> Compliance with environmental standards included in legally binding agreements with suppliers  Supplier Code of Conduct	Besides the Supplier Code of Conduct, NorthWestern includes provisions in its contracts requiring compliance with environmental requirements.
<input type="checkbox"/> Monitoring of suppliers' environmental performance	
<input type="checkbox"/> Engagement with suppliers to address non-compliance or improve their environmental performance	
<input type="checkbox"/> Targets and deadlines for the environmental improvement of suppliers	
<input type="checkbox"/> External certification (ISO 14001, organic, etc) covering over 50% of the company's suppliers	
<input type="checkbox"/> Engagement with NGOs or industry peers to address environmental issues in the supply chain	
<input type="checkbox"/> Reporting on environmental issues in the supply chain	
Percentage of suppliers receiving external certification	

References:

 [Environmental Policy](#)

 [Supplier Code of Conduct](#)




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	

Company only has a mission/vision/values statement concerning its approach to workforce development and management

References:

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

Diversity Tracking

Sustainalytics Number: S.1.3

Social / Diversity and Equal Opportunity / Diversity Tracking

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

<p>Diversity performance objectives and targets: NorthWestern Energy's diversity plan includes the following objectives:</p> <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 	
<p>Has company achieved its targets?</p>	
<p>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.</p>	
<p>Diversity Program Attribute</p>	<p>Comment</p>
<p><input checked="" type="checkbox"/> Managerial or board level responsibility for diversity initiatives</p>	
<p><input checked="" type="checkbox"/> Targeted recruitment</p>	
<p><input checked="" type="checkbox"/> Training and guidance regarding diversity</p>	
<p><input checked="" type="checkbox"/> Diversity initiatives that go beyond legal compliance</p>	
<p><input type="checkbox"/> Employee affinity groups, diversity councils, or networking groups</p>	
<p><input checked="" type="checkbox"/> Mentorship programs</p>	
<p><input checked="" type="checkbox"/> Initiatives supporting a diverse workforce</p>	
<p><input checked="" type="checkbox"/> Diversity monitoring or audits</p>	

Employee Turnover Rate

Sustainalytics Number: S.1.5

Social / Employment / Employee Turnover Rate

Please indicate your company's total, voluntary and involuntary turnover rates for the last four years as a percentage of total number of employees in the table below.

	2020	2019	2018	2017
Employee Turnover Rate (% of total employees). Please provide supporting evidence by attaching up to three (3) references (public URLs only)	9.4	8.0	8.6	7.1
% of company this employee turnover rate covers	100	100	100	100
Voluntary turnover (% of total employees). Please provide supporting evidence by attaching up to three (3) references (public URLs only)	8.8	9.8	10.1	9.0
Involuntary turnover (% of total employees)	.6	1.1	1.2	.8
Voluntary turnover (% of total turnover)	8.8	9.8	10.1	9.0
Percentage of company covered by indicators	100	100	100	100
Company breaks down the data of the total employee turnover rate based on the following categories. Please provide supporting evidence by attaching up to three (3) references: <input type="checkbox"/> Age group <input checked="" type="checkbox"/> Gender <input type="checkbox"/> Management level (e.g. junior/low level, middle, senior/top level management) <input checked="" type="checkbox"/> Race, ethnicity, nationality, country of origin or cultural background				
Currency used for average hiring cost/FTE				
Average hiring cost /FTE for the last fiscal year: Not tracked				
Data publicly available: No				
Please select one of the following options. (Required) <input type="radio"/> We track employee turnover and hiring costs, and have completed the table above. <input checked="" type="radio"/> We do not track employee turnover and hiring costs. <input type="radio"/> Not applicable. Please provide explanations in the appropriate comment box below. <input type="radio"/> Not known				

H&S Management

Sustainalytics Number: S.1.6.2.1

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	

Accidents, Fatalities and Incidents

Sustainalytics Number: S.1.6.5

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					

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

Supplier Social Compliance

Sustainalytics Number: S.2.1; CG.6.15

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 
Actions taken to address the issues of suppliers' non-compliance with the Code of Conduct:

Additional Comments


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

Community Engagement

Sustainalytics Number: S.4.2.2

General Disclosures / Stakeholder Engagement / Community Engagement

Note whether NorthWestern Energy has formal programs for engagement and/or consultation with affected community stakeholders, such as community advisory panels, or action boards, NGOs, government agencies or other community entities.

Does your company have a formal community involvement strategy: Yes, it is aligned with the overall corporate strategy
Our company:
<input checked="" type="checkbox"/> Participates in community involvement programs <input checked="" type="checkbox"/> Has established strategic community partnerships <input checked="" type="checkbox"/> Has an operations team in charge of community involvement issues
Community involvement programs include:
<input checked="" type="checkbox"/> Process for identifying stakeholders <input checked="" type="checkbox"/> Has formal programs for engagement/consultation with affected communities <input type="checkbox"/> †Provides support for disaster response and humanitarian relief efforts <input checked="" type="checkbox"/> Performance objectives, goals and/or benchmarks <input checked="" type="checkbox"/> Consults local communities <input checked="" type="checkbox"/> Builds relationships/partners with NGOs <input checked="" type="checkbox"/> †Builds relationships/partners with non-profit organizations <input checked="" type="checkbox"/> Community involvement projects independently assessed <input checked="" type="checkbox"/> Mechanisms for integrating community feedback into corporate practices <input checked="" type="checkbox"/> Takes measures to enhance community awareness and outreach <input checked="" type="checkbox"/> Executive responsibility for community relations <input type="checkbox"/> Community consultation guidelines <input checked="" type="checkbox"/> Consultation conducted at early stages of a project
With regards to community involvement, please indicate which of the following apply to your company:
<input checked="" type="checkbox"/> Set specific goals for community involvement <input checked="" type="checkbox"/> Use key performance indicators (KPIs) to measure progress towards community involvement goals <input checked="" type="checkbox"/> Monitor and evaluate community projects, including information on outcome and impact <input checked="" type="checkbox"/> Evaluate business decisions in the context of societal impact <input checked="" type="checkbox"/> Disclose total value of community spending by category (cash, in-kind donations, employee time)
 Community Report
In what ways do you encourage employees to support and add value in local communities:
<input checked="" type="checkbox"/> Matching employee charitable donations <input checked="" type="checkbox"/> Paid time off for employee volunteer efforts <input checked="" type="checkbox"/> Encouraging or requiring employees serve on the boards of charitable organizations <input checked="" type="checkbox"/> Facilitating donation drives, (e.g., clothing, food, etc.) <input checked="" type="checkbox"/> Other unique or innovative ways Toys for Tots Please specify Food Bank food drives Christmas Drives for community organizations
Describe Access to Basic Services programs
Website Community Relations and Governmental Affairs

Community Development Program

Sustainalytics Number: S.4.2.11

Social / Local Communities / Community Development Program
Information on community development

<input checked="" type="checkbox"/> Commitment to promote community development	Please provide details Economic Development Plan At-A-Glance Economic Impact Analysis Grant Program Charitable Contribution Programs Dedicated employees working in community relations, economic development and key account activities Community Volunteerism Sponsorship Program Community Infrastructure Upgrades/Expansions
<input checked="" type="checkbox"/> Community development initiatives	Please provide details Economic Development Plan At-A-Glance Economic Impact Analysis Grant Program Charitable Contribution Programs Community Volunteerism Sponsorship Program Community Infrastructure Upgrades/Expansions LED Street Light & Area Conversion Advanced Metering Infrastructure (AMI) Upgrade Energy Efficiency Programs Renewable Energy Pilot Programs
<input checked="" type="checkbox"/> Systematic involvement of local stakeholders in community development planning and/or monitoring	Please provide details Advantage South Dakota Montana Economic Developers Association Local Economic Development and Chamber of Commerce Montana Ambassadors Specialized Stakeholder Groups such as: -DSM -Green Tariff -Specialized Infrastructure Working Groups
<input checked="" type="checkbox"/> Community development targets and deadlines	Please provide details Load Growth Revenue Growth Customer Growth/Stability Annual Community Development Budget DSM Targets EV Implementations Fleet Electrification Natural Gas Expansion in South Dakota Sustainable Energy Portfolio Renewable Targets
<input checked="" type="checkbox"/> Monitoring of community development programs	Please provide details JD Power Customer Satisfaction Survey Flynn Wright Operational & Reputational Survey Key Account Customer Satisfaction Survey Business Leader Survey Community Development Related Budget Reviews Renewable Energy Pilot Programs Sustainability Plans (Missoula MOU)
<input checked="" type="checkbox"/> Initiatives to promote economic development after closure	Please provide details Succession Planning Workforce Development Next Step Consultation/Identification of Alternatives Facility Reuse Rate Deviation in South Dakota
<input checked="" type="checkbox"/> Reporting on community development programs and results	Please provide details Community Works Program JD Power Customer Satisfaction Survey Flynn Wright Operational & Reputational Survey Key Account Customer Satisfaction Survey Business Leader Survey Community Development Related Budget Reviews Renewable Energy Pilot Programs Sustainability Plans (Missoula MOU) Annual Environmental Report

References:


-  [Montana's LED street and yard lighting project](#)
-  [Natural Gas Expansion in South Dakota](#)
-  [Community Report](#)
-  [At A Glance Fact Sheets](#)

Code of Conduct

Sustainalytics Number: G.1.1

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 publicly available? Yes	

References:

 [Code of Conduct and Ethics](#)

Whistleblowing Programs

Sustainalytics Number: G.1.2; CG.6.12

Economic / Anti-Corruption / Whistleblowing Programs

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)

 [Community Report](#)

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

 [Key Sustainability Statistics Report](#)

*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.

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](#)

Identifying and Managing Economic, Environmental, and Social Impacts GRI 102-29

Sustainalytics Number: G.2.5

General Disclosures / Governance / Identifying and Managing Economic, Environmental, and Social Impacts GRI 102-29

Highest governance body's role in identifying and managing economic, environmental, and social topics and their impacts, risks, and opportunities – including its role in the implementation of due diligence processes.

Describe the highest governance body's role in the identification, management, and stakeholder consultation of economic, environmental and social impacts, risks, and opportunities.

The primary oversight responsibilities for ESG fall within the Board's Nominating and Governance Committee's purview. The Governance Committee's charter indicates it is responsible for ESG matters. However, certain topics related to ESG are covered by other committees. For instance, the Board's Human Resources Committee oversees a variety of social issues, such as work force diversity, equity, and inclusion, and a host of employee related matters. Our Board's Safety, Environmental, Technology, and Operations Committee oversees safety and environmental matters, among other responsibilities. Each of these committees hears from company and external subject matter experts on these topics and receives reports on these topics at each meeting.

Diversity of Governance Bodies and Employees GRI 405-1

Sustainalytics Number: G.2.7.1

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:

 [2021 Proxy Statement](#) Page(s) 49

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

Sustainalytics Number: G.2.7.1; G.2.9.1; CG.2.3; CG.2.9

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			
Vacancies on the board:				
Board member	Other commitments	Competences relating to economic, environmental and social impacts	Stakeholder representation	Tenure/term length
Dana Dykhouse	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 Surfboard, 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
<p>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.</p> <p>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</p>				
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:

Notes for Sustainalytics

Sustainalytics Number: Notes for Sustainalytics

General Disclosures / Reporting Practice / Notes for Sustainalytics

Additional information, comments and/or explanatory information for the Sustainalytics analyst(s).

Notes to Sustainalytics analyst:

Please see our Key Sustainability Statistics report for a history of robust quantitative ESG metric and disclosures.

References:

 [Key Sustainability Statistics Report](#)
