

TITLE: Workplace Violence Prevention					
Policy Number	Issued Date	Effective Date	Revision Date	Last Reviewed/ Approved Date	Issuing Department
HR0004	04/15/2009	04/15/2009	12/21/2020	12/21/2020	Human Resources
Approved by:	Heather Burns, Director Human Resources; Bobbi Schroepfel, VP Customer Care, Communications, and HR; Mike Nieman, Chief Audit & Compliance Officer; Heather Grahame, General Counsel and Vice President- Regulatory and Federal Government Affairs; Robert C. Rowe, President and CEO				

I. Statement of Policy

It is the policy of NorthWestern Energy to maintain a safe environment.

II. Objective

The objective of this policy is to address issues of intimidation, harassment, threats of and/or actual violence.

III. Scope

This policy applies to all NorthWestern Energy employees, non-employees, visitors, vendors, contractors and guests.

IV. Definitions

- A. *Threat of Violence:* Any behavior that is intended to harm a person or damage property. Threats may include but are not limited to oral, written, or communicated through gestures, conventional mail, electronic mail, fax or telephonic means and may be direct or implied.
- B. *Bullying:* Any behavior that threatens, humiliates, intimidates, degrades, or hurts another person either physically, emotionally, or mentally.
- C. *Hazing:* Any behavior, used as a way of initiating a person into a group regardless of the person's willingness to participate, that causes embarrassment, ridicule, harassment, abuse or humiliation.

V. Policy Provisions

- A. All employees should be treated with courtesy and respect at all times.
- B. Anyone determined to be responsible for threats of violence, actual violence, bullying, hazing, or conduct that is in violation of this Policy, the Code of Conduct and Ethics or other NorthWestern Energy policies may be subject to disciplinary action up to and including termination of employment.

- C. NorthWestern Energy encourages employees to bring their disputes or differences to the attention of their supervisor or human resources generalist as it becomes evident that the situation cannot be resolved by the parties involved or before the situation escalates.
- D. NorthWestern Energy is committed to assist in the resolution of employee disputes.
- E. Employees are expected to refrain from fighting, “horseplay”, or any other conduct that may be dangerous to themselves or others.
- F. Firearms, weapons, and other dangerous or hazardous non-work required devices or substances are prohibited, at all times, while employees are engaged in work or work-related activities and on NorthWestern Energy premises.
- G. Conduct, in coordination with the Anti-Harassment and Anti-Retaliation Policies, which threatens, intimidates, or coerces another employee, a contractor, a customer, or a member of the public at any time while at work will not be tolerated. Any off duty conduct meeting this description and related to the work environment will also not be tolerated. Conduct includes all acts of harassment, including harassment that is based on an individual’s race, color, religion, sex (including pregnancy, gender identity, and sexual orientation), national origin, age, disability, veteran status, or any other protected class in accordance with applicable federal or state laws and statutes.
- H. All NorthWestern Energy employees have an obligation to immediately report conduct that threatens, intimidates, or coerces another employee, a contractor, a customer, or a member of the public. Any actual act or threat of violence should be reported immediately to 911 or to any manager, the human resources generalist, the legal department, the chief audit and compliance officer, or the Compliance Line at 1-877-781-7286 (or online at: www.integrity-helpline.com/NW.jsp).
- I. NorthWestern Energy will promptly and thoroughly investigate all reports or threats of violence. The identity of the individual making a report will be protected as much as is practical but complete anonymity cannot be guaranteed. Employees still have an obligation to report. Reports may be made anonymously.
- J. NorthWestern Energy may place an employee on Administrative Leave in accordance with the Employment Policy pending the investigation and resolution of any reported workplace violence or threats.

VI. Corporate Policy Provisions

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

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

VII. Additional Resources

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