

## Northwest Natural Holding Company

### HUMAN RIGHTS POLICY

#### Preamble

While the responsibility to respect, protect, promote and fulfill human rights primarily falls on governments, we believe that these rights can also be supported by the private sector. In reaching this conclusion, we reviewed a variety of policies, declarations and principles, including, but not limited to: the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, United Nations Universal Declaration of Human Rights, United Nations Guiding Principles on Business and Human Rights, UN Global Compact, Organization for Economic Cooperation and Development Guidelines for Multinational Enterprises, as well as certain non-governmental human rights organization principles and charters. Informed by these various policies, declarations and principles, and after due consideration to the practices we engage in every day in our work, we have adopted the NW Natural Holding Company Human Rights Policy.

#### Policy Statement

Human rights are fundamental rights, freedoms and standards of treatment to which all people are entitled. This belief is deeply rooted in our core values of Integrity, Safety, Service Ethic, Caring and Environmental Stewardship, and is foundational to our [Code of Ethics](#), our workplace policies and practices, and our longstanding commitment to diversity, equity and inclusion. Northwest Natural Holding Company and its subsidiaries (collectively, we or the company) strive to abide by all laws and regulations and to uphold and respect human rights.

#### Application

In accordance with our [Code of Ethics](#), we expect our third party providers to be governed by values that are consistent with ours. All directors, officers, and employees, wherever located, are responsible for complying with this policy, and we expect everyone working on the company's behalf, including consultants, agents, vendors and other business partners to adhere to these standards while performing work for the company. This policy, along with our [Code of Ethics](#), is publicly available on [www.nwnatural.com](http://www.nwnatural.com).

#### Prevention of Discrimination and Harassment

We strive to promote an environment free from discrimination and harassment. We implement these principles through our [Code of Ethics](#) and other workplace policies and practices, including our *Equal Employment Opportunity* and *Prohibition on Discrimination and Harassment* policies, which prohibit discrimination and harassment based on race, color, religion, national origin, age, sex, sexual orientation, gender identity, disability, genetic information, marital status, status as a covered veteran or other status or characteristic protected by applicable law.

#### Diversity

We value and work to promote a diverse, equitable and inclusive work environment. Our vision is to acknowledge, embrace, and value differences so that everyone may thrive. We actively promote diversity, equity and inclusion (DE&I), and incorporate DE&I into NW Natural's culture, values and

strategies. We are committed to the principles of equal opportunity. At Northwest Natural Gas Company, we maintain an EEOC compliance program, a Diversity, Equity and Inclusion Program, including a Diversity, Equity and Inclusion Council, a Chief Diversity Officer position and a supplier diversity program, and provide a Diversity Report to members of the Board of Directors annually.

### **Gender Equity**

We believe that women's rights and economic inclusion are priorities for long term success. We regularly assess our employment and compensation practices with respect to women.

### **Work Hours, Wages, and Benefits**

We strive to comply with all applicable labor and employment laws and rules, including but not limited to those governing hours of work and relevant mandatory practices.

The company pays employees at least the minimum wages and overtime rates required by law and any governing collective labor agreements. If no such laws or agreements apply, the company will strive to pay wages in line with marketplace practices.

### **Prohibition on Child or Forced Labor**

We prohibit the use at our companies' operations all forms of child, compulsory or forced labor, and oppose any form of human trafficking. We expect all those working on the company's behalf to demonstrate similar intolerance for such practices.

### **Freedom of Association and Collective Bargaining**

We respect our employees' right to join, form or not join a labor union, seek representation, bargain or not bargain collectively in accordance with applicable laws, and without fear of reprisal, intimidation, or harassment. Where employees are represented by legally recognized unions, we aim to have constructive dialogues with their chosen representatives and bargain in good faith with such representatives.

### **Safe and Healthy Workplace**

We strive to provide a safe and hygienic work environment, including water, sanitation and other facility requirements, for all employees and contractors in premises under our control.

Our safety goal is no accidents or injuries. Employees are encouraged to and responsible for stopping or refusing to perform a job if it is not safe or cannot be performed safely. We work to provide and maintain a safe, healthy and productive workplace, in consultation with our employees, by addressing and remediating identified risks of accidents, injury and health impacts.

We strive to support our employees' personal health and well-being, including physical and emotional well-being, and we offer benefits and services in furtherance of these aims.

### **Security**

We are committed to maintaining a workplace that is free of violence, harassment, intimidation and other unsafe or disruptive conditions due to internal or external threats. We are committed to providing appropriate security safeguards for employees.

## **Environmental Stewardship, Natural Resources and Biodiversity**

Our commitment to environmental stewardship is reflected in our core values, and we are dedicated to protecting and enhancing the quality of the natural environment and to operating our business in an increasingly sustainable manner. That commitment is embodied in our [Environmental Policy](#).

We additionally recognize the significant human rights implications of land use and water use in our operations, which we address through our Environmental Stewardship policies and actions.

In terms of biodiversity, we strive to minimize our impact on communities, including respecting indigenous peoples. We work to acknowledge tribal, historic and custom lands throughout our service territory, and work to conduct the appropriate impact assessments such as community and biodiversity, as appropriate.

## **Anti-Corruption and Bribery**

As further described in our [Code of Ethics](#), we strive to deal fairly and in good faith with our customers, shareholders, employees, regulators, suppliers, competitors and others. Bribery and corruption are not in line with these values and are not permissible.

## **Reporting and Accountability**

If an employee, business partner, supplier, customer or other stakeholder witnesses or learns of any incident that may involve a violation of this policy, they can report their concern, anonymously, if desired, via our Integrity Hotline (866-546-3696) or [NWNIntegrity.com](#), available 24 hours a day, seven days a week. Every report made to the Integrity Hotline is reviewed, and where appropriate, investigated. In addition, company employees may report a concern to their immediate supervisor, the next level of management above their supervisor, or to any member of the Business Integrity team. We do not tolerate retaliation against individuals who report concerns in good faith.

Any substantiated violation of this policy, or refusal to cooperate with an investigation under this policy, will result in disciplinary action, up to and including termination and referral to the appropriate authorities. Where we have reason to believe that someone working on our behalf has infringed on human rights, we reserve the right to cease that relationship as warranted.

## **Stakeholder Engagement**

Our community of stakeholders starts with our employees and extends to our customers, business partners, suppliers, organized labor unions, investors and shareholders, lenders, financial analysts, regulators, government officials, community leaders, non-profits and other organizations, the media and others in the communities in which we operate. Where appropriate, we engage with stakeholders in those communities to ensure that we listen to, learn from, collaborate with and incorporate their views as we conduct our business. We strive to carefully consider engagement mechanisms in order to communicate with and respond to our stakeholders as appropriate under the circumstances. We pay particular attention to individuals or groups who may be at greater risk of negative human rights impacts due to their vulnerability or marginalization and recognize that minority, female and disadvantaged groups may face different risks.

**Education**

Each employee has a duty to be familiar with and comply with this Human Rights Policy and other company policies, programs, standards and procedures regarding human rights. As part of this duty, each employee has an obligation to complete all required training with respect to human rights, including but not limited to the company's [Code of Ethics](#).

**Governance**

This policy was approved by our Board of Directors. The Public Affairs and Environmental Policy Committee of our Board of Directors oversees implementation of this policy at the board level, and management oversight of this policy rests with our Business Integrity Team, led by our Chief Compliance Officer, working in collaboration with legal, human resources, community affairs, and governmental affairs departments.

We will periodically review and evaluate compliance with this policy. We reserve the right to amend this policy at any time.