



NorthWestern Corporation

doing business as

NorthWestern Energy

ISS Environment & Social  
Disclosure Report

For Calendar Year 2022

Disclosed December 2023

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# Carbon and Climate

## Carbon and Climate: Management Policies, Systems, and Disclosure

### Climate Change Risks, Performance, and Opportunities

Carbon and Climate / Carbon and Climate: Management Policies, Systems, and Disclosure / Climate Change Risks, Performance, and Opportunities

Publicly available information on climate change policies that address risk, performance, and opportunities at NorthWestern Energy

Does the company disclose a climate change policy or equivalent information that specifically addresses the company's climate change risks, performance, and opportunities?

Yes

-  [Net Zero by 2050 \(pdf\)](#) Page(s) 1-20
-  [2022 Annual Report](#) Page(s) 26-33 and F41-F43
-  [2023 Proxy Statement](#) Page(s) 68-69

Does the company's climate change disclosure specifically address climate change risks?

Yes

-  [Net Zero by 2050 \(pdf\)](#) Page(s) 1-20
-  [2022 Annual Report](#) Page(s) 26-33 and F41-F43
-  [2023 Proxy Statement](#) Page(s) 68-69

Does the company's climate change disclosure specifically address climate change opportunities?

Yes

-  [Net Zero by 2050 \(pdf\)](#) Page(s) 1-20
-  [2022 Annual Report](#) Page(s) 26-33 and F41-F43
-  [2023 Proxy Statement](#) Page(s) 68-69

Does the company's climate change disclosure specifically address climate change strategy?

Yes

-  [Net Zero by 2050 \(pdf\)](#) Page(s) 1-20
-  [2022 Annual Report](#) Page(s) 26-33 and F41-F43
-  [2023 Proxy Statement](#) Page(s) 68-69

Does the company's climate change disclosure specifically address climate change performance?

Yes

-  [Net Zero by 2050 \(pdf\)](#) Page(s) 1-20

Does the company's climate change disclosure specifically address climate change targets?

Yes

-  [Net Zero by 2050 \(pdf\)](#) Page(s) 1-20


Does the company's climate change disclosure specifically provide analysis of performance against targets?

Not Disclosed

Does the company's climate change disclosure describe the impact of climate-related risks and opportunities on the organization's businesses, strategy, and financial planning?

Yes

 [Net Zero by 2050 \(pdf\)](#) Page(s) 1-20

 [2022 Annual Report](#) Page(s) 26-33 and F41-F43

Does the company's climate change disclosure present and describe multiple scenarios for the potential impact of climate-related risks and opportunities on its businesses, strategy, and financial planning?

Yes

 [Net Zero by 2050 \(pdf\)](#) Page(s) 1-20

Does the company's climate change disclosure include an impact scenario that references 2°C limits?

Yes

 [Net Zero by 2050 \(pdf\)](#) Page(s) 1-20

References:

 [Environmental Policy](#)

 [Enterprise Risk Management Charter](#)

 [Enterprise Risk Management Policy](#)

**Aligned Frameworks/Raters**

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## Environmental Disclosures Through CDP

Carbon and Climate / Carbon and Climate: Management Policies, Systems, and Disclosure / Environmental Disclosures Through CDP

Information on the company's CDP disclosures

What frequency of monitoring does the company disclose for their risk management procedures in their most recent CDP disclosure? N/A
In the company's most recent CDP disclosure, which CDP option has been selected as best describing its risk management procedures with regard to climate change risks and opportunities? N/A
How far into the future does the company monitor risk management procedures according to its most recent CDP disclosure? N/A
In the company's most recent CDP disclosure, to whom within the company's organizational structure are the results of risk management procedures with regard to climate change risks and opportunities reported? N/A
Does the company report GHG emissions data to the CDP? Not Applicable
Which is the most recent year the company has submitted GHG emissions data for to the CDP? N/A <a href="#">Key Sustainability Statistics Report</a>
If the company reports GHG emissions data to the CDP, what is its recent-year CDP score? N/A
Has the company, for the last three consecutive years, received lower than a C grade in any of CDP's scoring methodologies? Not Applicable
Does the company disclose quantitative and qualitative environmental information through CDP's forests questionnaire? Not Disclosed
Does the company disclose quantitative and qualitative environmental information through CDP's water questionnaire? Not Applicable

Aligned Frameworks/Raters  
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**Process for Assessing Climate Risk**





Carbon and Climate / Carbon and Climate: Management Policies, Systems, and Disclosure / Process for Assessing Climate Risk

Does the company describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organization's overall risk management? Yes <hr/>
Does the company disclose the metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management process? Yes <hr/>
Does the company describe management's role in assessing and managing climate-related risks and opportunities? Yes <hr/>
Does the company describe the board's oversight of climate-related risks and opportunities? Yes <hr/>

**Additional Comments**

NorthWestern has adopted a Net Zero by 2050 Plan. In the normal course of business, management oversees execution and the board of directors oversees progress and risks associated with implementation. In addition, weather-driven generation is addressed in the Montana Integrated Resource Plan 2023/

**References:**

-  [SETO Committee Charter](#)
-  [Net Zero by 2050 \(web portal\)](#)
-  [Montana Integrated Resource Plan 2023](#)
-  [2022 Annual Report](#) Page(s) 26-33 and F41-F43



**Aligned Frameworks/Raters**  
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## Technology and Opportunity

### Carbon and Climate Technology and Opportunity

Carbon and Climate / Technology and Opportunity / Carbon and Climate Technology and Opportunity

Publicly available information on low carbon investments at NorthWestern Energy

Does the company disclose investments in low carbon opportunities? Yes <hr/>  <a href="#">Net Zero by 2050 (pdf)</a>  <a href="#">Montana Integrated Resource Plan 2023</a> <span style="margin-left: 20px;">Page(s) 20</span>
Does the company disclose a formal strategy for managing exposure to investments in the fossil-fuel sector? <hr/>

**Additional Comments**

NorthWestern invests extensively in carbon free hydroelectric and wind facilities to add carbon free generation to our supply portfolio. Weather driven renewable generation and demand are addressed in NorthWestern's Montana Integrated Resource Plan 2023.

Our Net Zero by 2050 Document describes NorthWestern's current plan and commitment to achieve net zero Scope 1 and Scope 2 carbon emissions by 2050 while continuing to provide reliable, affordable services for our customers.

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## GHG Emissions

### GHG Reduction Targets

Publicly disclosed information on GHG reduction targets at NorthWestern Energy

Does the company disclose targets for reducing GHG emissions? Yes <a href="#">Net Zero by 2050 (pdf)</a>
Does the company define GHG emissions reduction targets at group level? Yes <a href="#">Net Zero by 2050 (pdf)</a>
Are the company's GHG emissions reduction targets clearly aligned with the 2°C scenario? Yes <a href="#">Net Zero by 2050 (pdf)</a> Page(s) 14 & 18
Does the company indicate that GHG emissions reduction targets have been approved by The Science Based Targets initiative? No

**Aligned Frameworks/Raters**



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**GHG Emissions Disclosures**

Publicly available information on disclosures of GHG emissions

Does the company provide quantitative metrics about GHG emissions? Yes <a href="#">Key Sustainability Statistics Report</a> Page(s) 5 Scope 1 and 2 CO2 emissions <a href="#">EEI/ESG Sustainability Document</a> <a href="#">AGA ESG Template</a>
Does the company disclose its total Direct GHG emissions? Yes <a href="#">Key Sustainability Statistics Report</a> Page(s) 5 <a href="#">EEI/ESG Sustainability Document</a> <a href="#">AGA ESG Template</a>
3BL Media: Scope 1 GHG Emissions-Direct Emissions 2,822,803 <a href="#">Key Sustainability Statistics Report</a> Page(s) 5 2022 estimate in Metric Tons for Owned Electric Generation, Electric Transmission and Company Owned Fleet
Does the company disclose its total Scope 2 GHG emissions? Yes <a href="#">Key Sustainability Statistics Report</a> Page(s) 5



3BL Media: Scope 2 GHG Emissions-Indirect Emissions
9,070
 <a href="#">Key Sustainability Statistics Report</a> Page(s) 5 2022 estimate in metric tons
Does the company disclose its total Scope 3 GHG emissions?
No
3BL Media: Scope 3 GHG Emissions-Indirect Emissions
Does the company disclose its direct GHG emissions at any level other than enterprise (including facility, business unit, region, etc.)?
No
Does the company disclose the percentage of scope 1 emissions covered under a regulatory program?
Not Disclosed
 <a href="#">Key Sustainability Statistics Report</a> Page(s) 5 2022 estimate of emissions in metric tons. All emissions are related to our regulated business
Does the company disclose the percentage of emissions covered under emissions-limiting regulations?
Not Applicable
Does the company disclose the percentage of emissions covered under emissions-reporting regulations?
No
Has the company obtained independent third-party verification for its GHG disclosure?
No

**Additional Comments**

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

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

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

**Aligned Frameworks/Raters**

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## Energy and Fuel Efficiency

### Energy Disclosure

Carbon and Climate / Energy and Fuel Efficiency / Energy Disclosure

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

Are the company's operations covered by a certified ISO 50001 or does the company reference ISO 50001 in connection with its energy efficiency management systems or strategies?
No

Does the company provide quantitative metrics about energy consumption?

Yes

-  [Key Sustainability Statistics Report](#) Page(s) 2-4
-  [2022 FERC Form 1 Report](#) Page(s) 401a - Line 26

Does the company disclose its total energy use?

Yes

-  [Key Sustainability Statistics Report](#) Page(s) 5

3BL Media only: Total energy use normalized

3BL Media only: Total energy use in megawatt hours

Does the company disclose information on energy derived from renewable and non-renewable sources?

Yes

-  [EEI/ESG Sustainability Document](#) Page(s) 2

Does the company disclose the percentage of energy used that is derived from renewable sources?

Yes

-  [Key Sustainability Statistics Report](#) Page(s) 4-5

Does the company disclose the gross total of energy used that is derived from renewable sources?

No

Does the company disclose a breakout of the sources of the renewable energy used?

Yes

-  [EEI/ESG Sustainability Document](#) Page(s) 2

Does the company disclose the percentage of energy used that is derived from non-renewable sources?


Yes

-  [EEI/ESG Sustainability Document](#) Page(s) 2

Does the company disclose the gross total of energy used that is derived from non-renewable sources?


Does the company disclose the amount of energy used that is derived from non-renewable sources at any level other than enterprise (including facility, business unit, region, etc.)?

Yes

-  [EEI/ESG Sustainability Document](#) Page(s) 2 By Jurisdiction - Montana & South Dakota

Does the company disclose the amount of energy used that is derived from renewable sources at any level other than enterprise (including facility, business unit, region, etc.)?

Yes

 [EEI/ESG Sustainability Document](#) Page(s) 2 By Jurisdiction - Montana & South Dakota

**Additional Comments**

Documents referenced below include energy supply resources by type of resource and a breakdown of MWhs of energy delivered by resource type. NorthWestern strives to balance legal requirements to provide cost-effective, reliable and stably priced energy with being good stewards of natural resources and a diligent focus on sustainability. We own a mix of clean and carbon-free energy resources balanced with traditional energy sources that are necessary for us to deliver affordable and reliable electricity to our customers 24/7. In 2022, approximately 55 percent of our retail needs originated from carbon-free resources, better than the total U.S. electric power industry (40 percent carbon-free).

**References:**

 [Key Sustainability Statistics Report](#)

 [2022 Annual Report](#) Page(s) 11 of the 10K portion

**Aligned Frameworks/Raters**  
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**Energy Conservation Programs**

Carbon and Climate / Energy and Fuel Efficiency / Energy Conservation Programs  
Publicly available information on energy conservation programs at NorthWestern Energy

Does the company disclose information on energy conservation programs and performance?

Yes

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

Does the company disclose the total amount of energy conserved through its energy conservation programs? (This should be a total amount, not a percentage)

Yes

 [Key Sustainability Statistics Report](#) Page(s) 7 Electricity and natural gas

Does the company disclose its energy conservation resulting from such programs at any level other than enterprise (including facility, business unit, region, etc.)?

No

Does the company disclose the amount of total investment in energy conservation programs?

Yes

 [EEI/ESG Sustainability Document](#) Page(s) 3 - Line 3.3

Does the company disclose the associated total savings or profits achieved as a result of energy conservation programs?

No

Does the company disclose a clear approach to reduce energy consumption from non-renewable sources?

Yes

 [Net Zero by 2050 \(pdf\)](#)


Does the company's approach to reducing energy consumption from non-renewable sources include relative targets?

Yes

 [Net Zero by 2050 \(pdf\)](#)

Does the company's approach to reducing energy consumption from non-renewable sources include absolute targets?


Yes

 [Net Zero by 2050 \(pdf\)](#)

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Does the company's approach to reducing energy consumption from non-renewable sources include specific information on an implementation timeline?

Yes

 [Net Zero by 2050 \(pdf\)](#)



**Additional Comments**

Our commitment at NorthWestern Energy is to provide our customers and communities reliable, affordable and responsible critical energy infrastructure and essential service. We are stewards of over \$7 billion in electric and natural gas infrastructure dedicated to serve our customers in Montana, South Dakota, Nebraska and Yellowstone National Park. In 2023 we expect to invest another \$510 million of capital in this infrastructure. Because of the special places we are privileged to serve, environmental stewardship is core to who we are and what we do.

While staying true to our core responsibilities, we are also committing to achieve carbon neutrality in our electric and natural gas operations by 2050 – net zero carbon and methane emissions. This will allow us to do our part, as a relatively small company serving a large and dynamic region, to help achieve the goal of limiting the global temperature increase to less than 2° Celsius (3.6° Fahrenheit).

Our Net Zero commitment is part of our much larger focus on Environmental, Social, and Governance (ESG) work. Moody's Investor Services has rated NorthWestern's corporate governance practices fifth best among all publicly traded energy and utility companies in North America. For the past two years, an internal ESG team has undertaken a complex project to identify and disclose an extensive array of ESG practices and policies, and also identify and address gaps – places where we can, will, and are doing better.

**References:**

-  [Save Energy and Money](#)
-  [Net Zero by 2050 \(pdf\)](#)

**Aligned Frameworks/Raters**  
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**Electricity Disclosures**

Carbon and Climate / Energy and Fuel Efficiency / Electricity Disclosures

Publicly available information on electricity use.

Does the company disclose its total electrical power use? Yes  <a href="#">Key Sustainability Statistics Report</a> Page(s) 5
Does the company disclose a normalized total electrical power use value? No
Does the company disclose its electrical power use at any level other than enterprise (including facility, business unit, region, etc.)? No
Does the company disclose the percentage of consumed energy from the grid? No
Does the company disclose information on electrical power derived from renewable and non-renewable sources? Yes  <a href="#">Key Sustainability Statistics Report</a> Page(s) 4-5
Does the company disclose the percentage of electrical power used that is derived from non-renewable sources? No
Does the company disclose the percentage of electrical power from renewable sources? No
Does the company disclose the gross total of electrical power used that is derived from non-renewable sources? No
Does the company disclose the gross total of electrical power used that is derived from renewable sources? No
Does the company disclose a breakout of the sources of the non-renewable electrical power used? Yes  <a href="#">Key Sustainability Statistics Report</a> Page(s) 4-5
Does the company disclose a breakout of the sources of the renewable electrical power used? Yes  <a href="#">Key Sustainability Statistics Report</a> Page(s) 4-5
Does the company disclose the amount of electrical power used that is derived from renewable sources at any level other than enterprise (including facility, business unit, region, etc.)? No

References:

 [Key Sustainability Statistics Report](#) Page(s) 4-5

## Renewable Generation Capacity Approach

Carbon and Climate / Energy and Fuel Efficiency / Renewable Generation Capacity Approach

Publicly available information on approach to increasing generation capacity from renewable sources at NorthWestern Energy

Does the company disclose a clear approach to increase generation capacity from renewable sources? Yes <a href="#">Net Zero by 2050 (pdf)</a>
Does the company's approach to increasing generation capacity from renewable sources include relative targets? Yes <a href="#">Net Zero by 2050 (pdf)</a>
Does the company's approach to increasing generation capacity from renewable sources include absolute targets? No
Does the company's approach to increasing generation capacity from renewable sources include specific information on an implementation timeline? Yes <a href="#">Net Zero by 2050 (pdf)</a>

### Additional Comments

Our Net Zero by 2050 Document describes NorthWestern's current plan and commitment to achieve net zero Scope 1 and Scope 2 carbon emissions by 2050 for our electric and gas businesses while continuing to provide reliable, affordable services for our customers. It also includes information regarding the electrification of our fleet vehicles and our EV infrastructure investments.

NorthWestern strives to balance legal requirements to provide cost-effective, reliable and stably priced energy with being good stewards of natural resources and a diligent focus on sustainability. We own a mix of clean and carbon-free energy resources balanced with traditional energy sources that are necessary for us to deliver affordable and reliable electricity to our customers 24/7.

Approximately 60% of the energy produced by NorthWestern Energy for Montana comes from renewable and carbon-free sources, including hydro, wind and solar. Over the last decade, we have already reduced the carbon intensity of our energy generation in Montana by more than 50%. In the last five years alone, we have invested more than \$1 billion in clean energy projects, including hydro, wind and solar facilities. Information about our clean portfolio can be found on the "Our Company" page of our website at [www.northwesternenergy.com](http://www.northwesternenergy.com).

### References:

[Net Zero by 2050 \(pdf\)](#)

### Aligned Frameworks/Raters

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## Management of Environmental Risks and Opportunities

### Environmental Controversy

Management of Environmental Risks and Opportunities / Environmental Controversy

Publicly available information on whether or not NorthWestern Energy has suffered and responded to any environmental controversies

If the company suffered a major environmental controversy, has it failed to adopt an adequate remedial action?

No

### Additional Comments

NorthWestern did not suffer a major environmental controversy that required remedial actions in 2022 or to date in 2023. The legal challenges to the air quality permit for the Yellowstone County Generating Station are described in the April 2023 10-Q. Since that writing, the permit vacature has been stayed and construction has been reinitiated.





### Aligned Frameworks/Raters

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# Enterprise Level Environmental Policy

Management of Environmental Risks and Opportunities / Enterprise Level Environmental Policy



Publicly available information on the presence of a group-level and formal environmental policy at NorthWestern Energy

Does the company's annual/integrated/sustainability report identify specific salient risks that its activities and business relationships pose on the environment? Yes  <a href="#">2022 Annual Report</a> Page(s) 26-33 and F41-F43
Does the company have an enterprise level environmental policy? Yes  <a href="#">Environmental Policy</a> Page(s) 1-3
Does the company's environmental policy apply the same standards to suppliers or vendors? Yes  <a href="#">Environmental Policy</a> Page(s) 3  <a href="#">Supplier Code of Conduct</a> Page(s) 9
Does the company disclose the priority non-conformance rate and associated corrective action rate for suppliers' compliance with environmental policies? No

## Additional Comments

At NorthWestern Energy, it is our privilege to be stewards of essential infrastructure and to provide utility services across an extraordinary part of America – Montana, Nebraska, South Dakota and Yellowstone National Park – for more than 100 years. Every day we work together to achieve our mission of delivering safe, reliable and innovative energy solutions that create value for customers, communities, employees and our investors. To accomplish this mission, NorthWestern Energy employees focus on safety, honesty and respect, with an expectation of operating ethically and with integrity in accordance with our Employee Code of Conduct and Ethics. The work of all contractors, suppliers and vendors and their employees, agents and subcontractors (our "Suppliers") is critical to the success of our mission and directly reflects upon NorthWestern Energy. Accordingly, our Suppliers must embody our "SERVICE" values of Safety, Excellence, Respect, Value, Integrity, Community and Environment. NorthWestern Energy's expectations for Suppliers are described in this Supplier Code of Conduct ("Code"). We encourage sound and prudent environmental, social and governance practices, and this Code applies to all Suppliers who support NorthWestern Energy, its partners and affiliates by delivering services or products necessary for the safe, successful and ethical conduct of our business. We expect our Suppliers to educate and supervise their employees, agents and subcontractors so they understand and comply with this Code. **Compliance is an expectation for qualification as a Supplier with NorthWestern Energy.**

## References:

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


## Aligned Frameworks/Raters

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# Code of Vendor Conduct: Environmental Expectations

Management of Environmental Risks and Opportunities / Code of Vendor Conduct: Environmental Expectations

Publicly available information on environmental expectations in the Code of Vendor Conduct at NorthWestern Energy

Does the company's publicly disclosed Code of Vendor Conduct address the environmental impact of supplier products or services? Yes  <a href="#">Supplier Code of Conduct</a> Page(s) 9
Does the company's publicly disclosed Code of Vendor Conduct address supply chain audits for environmental management? No

## Aligned Frameworks/Raters

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# Environmental Management System Disclosures

Management of Environmental Risks and Opportunities / Environmental Management System Disclosures

Publicly available information on environmental management systems at NorthWestern Energy

Does the company disclose the presence of an Environmental Management System? Yes <a href="#">Environmental Policy</a> ECO System
Does the company disclose that its Environmental Management System is certified and/or attested to ISO 14001? No <a href="#">Environmental Policy</a>
Is the company as a whole ISO 14001 attested? No
Does the company disclose the percentage of the suppliers' operations covered by a certified ISO 14001 or EMAS environmental management system? No
Does the company disclose whether its environmental management system lead reports directly to the CEO or management board? No

## Additional Comments

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

## References:

[Supplier Code of Conduct](#)

[Environmental Policy](#)

## Aligned Frameworks/Raters

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# Natural Resources

## Water

### UN Global Compact CEO Water Mandate

Natural Resources / Water / UN Global Compact CEO Water Mandate

Publicly available information about endorsement of the UN Global Compact CEO Water Mandate

Does the company endorse the UN Global Compact CEO Water Mandate?

Not Applicable

## Aligned Frameworks/Raters




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## Water Use and Withdrawal

Natural Resources / Water / Water Use and Withdrawal



Publicly available information on water use and withdrawal at NorthWestern Energy

Does the company disclose its total water use? Yes  <a href="#">Key Sustainability Statistics Report</a> Page(s) 5
Does the company's disclosed data regarding water use identify the total water withdrawn? Yes  <a href="#">Key Sustainability Statistics Report</a> Page(s) 5
3BL Media only: Total water consumed normalized (cubic meters)
3BL Media only: Total water consumed (cubic meters)
Does the company's disclosed data regarding water use identify the total water consumed? Yes  <a href="#">Key Sustainability Statistics Report</a> Page(s) 5
Does the company break out its disclosed water withdrawal by source? Not Disclosed
Does the company disclose the percentage of water sourced from regions with High or Extremely High Baseline Water Stress? Not Disclosed
Does the company disclose information on risks associated with water withdrawal or scarcity? Not Disclosed
Does the company provide information on strategies to mitigate water withdrawal or scarcity risks? Not Disclosed
Does the company disclose information on incidents of non-compliance with water quality or quantity permits, standards, or regulations? Not Disclosed
Does the company disclose its water use for any of its operations located outside its primary domicile (e.g. the U.S. for Russell 3000 companies) at any level other than enterprise (including facility, business unit, region, etc.)? Not Applicable

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**Water Discharge and Recycling**

Natural Resources / Water / Water Discharge and Recycling

Does the company disclose its total wastewater discharge? Yes <input type="text"/>
Does the company disclose a water recycling program? No <input type="text"/>
Does the company disclose information about water recycled and reused? Yes <input type="text"/>
Does the company's disclosed information about water recycled and reused include the percentage recycled? Not Applicable <input type="text"/>
Does the company's disclosed information about water recycled and reused include the percentage reused? No <input type="text"/>

References:

 [Key Sustainability Statistics Report](#) Page(s) 5

**Aligned Frameworks/Raters**

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## Waste and Toxicity

### Emissions and Spills

#### Air Emissions Targets

Waste and Toxicity / Emissions and Spills / Air Emissions Targets

Publicly available information on reducing NOx, SOx and other significant air emissions at NorthWestern Energy

Does the company disclose specific targets for reducing NOx, SOx, and other significant air emissions? <input type="text"/>
Do the company's targets for reducing NOx, SOx, and other significant air emissions include relative targets? <input type="text"/>
Do the company's targets for reducing NOx, SOx, and other significant air emissions include absolute targets? <input type="text"/>
Do the company's targets for reducing NOx, SOx, and other significant air emissions include specific information on an implementation timeline? <input type="text"/>

Additional Comments

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

In 2019, NorthWestern released a Request for Proposals for a project involving the retirement of dual-fueled combustion turbine electric generating units at its Huron Generating Station with efficient and flexible, natural gas fired reciprocating internal combustion engines. The new units at the Huron Generating Station (renamed the Bob Glanzer Generating Station) began commercial operation in June of 2022.

The old, original equipment at the Huron Generating Station did not have any emissions controls equipment. The new units are equipped with selective catalytic reduction to control NOx and oxidation catalyst to control CO and VOC emissions. The new units also have a much better heat rate meaning it takes much less fuel to generate the same amount of electricity.

**Aligned Frameworks/Raters**

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### Quantitative Information on Air Emissions

Publicly available information on quantitative disclosures of significant air emissions at NorthWestern Energy

Does the company disclose quantitative information on significant air emissions? Yes
Does the company disclose quantitative information on significant air emissions from nitrogen oxides (NOx), excluding N2O? Yes
Does the company disclose quantitative information on significant air emissions from sulphur oxides (SOx)? Yes
Does the company disclose quantitative information on significant air emissions from non-methane volatile organic compounds (VOCs)? Yes
Does the company disclose quantitative information on significant air emissions from particulate matter (PM)? No
Does the company disclose quantitative information on significant air emissions from hazardous air pollutants (HAPs)? No
Does the company disclose quantitative information on significant air emissions from mercury (Hg)? Yes
Does the company disclose quantitative information on significant air emissions from lead (Pb)? No
Does the company disclose quantitative information on significant air emissions from polycyclic aromatic hydrocarbons (PAHs)? No
Does the company disclose quantitative information on significant air emissions from hydrogen sulfide (H2S)? No
Does the company's disclosure of quantitative information on significant air emissions identify the percentage of emissions in or near areas of dense population? No

Additional Comments

NorthWestern Corporation (dba NorthWestern Energy) is among the Edison Electric Institute (EEl) and American Gas Association (AGA) member companies utilizing the voluntary Environmental, Social, Governance (ESG) / Sustainability reporting templates. This information is being provided in response to the desire of investors and other stakeholders for ESG/Sustainability information that is consistent across member companies in the electric and natural gas utility sectors.

NorthWestern Energy provides electricity and/or natural gas to approximately 764,200 (462,900 electric & 301,300 natural gas) customers in Montana, South Dakota, Nebraska, and Yellowstone National Park. We are working to deliver safe, reliable and innovative energy solutions that create value for customers, communities, employees and investors. This includes bridging our history as a regulated utility safely providing low-cost and reliable service with our future as a globally-aware company offering a broader array of services performed by highly-adaptable and skilled employees. We seek to deliver value to our customers by providing high reliability and customer service, and an environmentally sustainable generation mix at an affordable price. The energy landscape is changing and we are committed to meeting the changing demands of our customers through continued investment to enhance reliability, security and safety, grid modernization, and integrate even more renewables, while meeting our growing demand for capacity. We are focused on delivering long-term shareholder value through:

- Infrastructure investment focused on a stronger and smarter grid to improve the customer experience, while enhancing grid reliability and safety. This includes automation in customer meters, distribution and substations that enables the use of proven new technologies.
- Investing in and integrating supply resources that balance reliability, cost, capacity, and sustainability considerations with more predictable long-term commodity prices.
- Continually improving our operating efficiency. Financial discipline is essential to earning our authorized return on invested capital and maintaining a strong balance sheet, stable cash flows, and quality credit ratings.

We expect to pursue these investment opportunities and manage our business in a manner that allows us to be flexible in adjusting to changing economic conditions by adjusting the timing and scale of the projects.

In 2022, approximately 55 percent of our retail needs originated from carbon-free resources, compared to approximately 40 percent for the total U.S. electric power industry. Our vision for the future builds on the progress we have made, including our hydroelectric system in Montana, which is 100 percent carbon free and is readily available capacity. Wind generation is a close second and continues to grow. We are committed to working with our customers and communities to help them achieve their sustainability goals and add new technology on our system.

References:

 [EEI/ESG Sustainability Document](#)

 [Key Sustainability Statistics Report](#)

 [AGA ESG Template](#)

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## Hazardous and Non-hazardous Waste

### Hazardous and Non-Hazardous Waste

Waste and Toxicity / Hazardous and Non-hazardous Waste / Hazardous and Non-Hazardous Waste

Publicly available information on hazardous and non-hazardous waste at NorthWestern Energy

Does the company disclose its total hazardous waste generation? Yes <input type="text"/>
Does the company disclose its hazardous waste generation for any of its operations located outside its primary domicile (e.g. the U.S. for Russell 3000 companies) at any level other than enterprise (including facility, business unit, region, etc.)? Not Applicable <input type="text"/>
3BL Media only: Total weight of generated hazardous waste trend <input type="text"/>
3BL Media only: Total weight of generated hazardous waste normalized <input type="text"/>
3BL Media only: Total weight of generated hazardous waste (metric ton) <input type="text"/>
Does the company disclose details regarding its hazardous waste disposal program? No <input type="text"/>
Does the company provide information about non-hazardous waste? Yes <input type="text"/>
Does the company's disclosed information on non-hazardous waste include quantitative metrics? Yes <input type="text"/>
Does the company's disclosed information on non-hazardous waste cover all operations? No <input type="text"/>
Does the company's disclosed information on non-hazardous waste include the percentage of waste recycled? Yes <input type="text"/>
Does the company's disclosed information on non-hazardous waste include the percentage of waste incinerated? No <input type="text"/>
Does the company's disclosed information on non-hazardous waste include the percentage of waste landfilled? No <input type="text"/>

References:

 [Key Sustainability Statistics Report](#) Page(s) 5

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## Waste Management Programs

Waste and Toxicity / Hazardous and Non-hazardous Waste / Waste Management Programs

Details of waste management programs at NorthWestern Energy

Does the company disclose information on its waste management and recycling programs? Yes <a href="#">Key Sustainability Statistics Report</a>
Does the company disclose a business waste recycling program? Other Please specify: See comments below.
Does the company disclose a production waste recycling program? Not Applicable
Does the company disclose a consumer product recycling program? Not Applicable
Does the company disclose a business waste management program? Other Please specify: See comments below.
Does the company disclose a production waste management program? Not Applicable
Does the company disclose a packaging waste management program? Not Applicable
Does the company disclose a consumer product waste management program? Not Applicable
Does the company disclose a chemical waste management program? Other Please specify: See comments below.

### Additional Comments

NorthWestern's Safety, Health and Environmental Services Handbook includes information about managing solid waste, hazardous and non-hazardous waste, oil spills, PCB management, recycling used oil, and employee training among many other safety and environmental topics. This handbook is not currently disclosed publicly. Further, our newly established Sustainable Procurement and Practices Guidelines include standards for reducing all waste.

NorthWestern also has an internal Waste Management Plan that includes information about hazardous waste generation and regulation, specific guidelines for management of various waste streams, specific guidelines on how to minimize each waste stream, training requirements, internal and regulatory reporting requirements, an internal environmental emergency response flowchart and other applicable information.

### References:

[Key Sustainability Statistics Report](#)

### Aligned Frameworks/Raters

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## Hazardous Waste Reduction

Waste and Toxicity / Hazardous and Non-hazardous Waste / Hazardous Waste Reduction

Publicly available information on waste reduction targets at NorthWestern Energy .

Does the company disclose specific targets for reducing hazardous and non-hazardous waste? No <input type="text"/>
Does the company's disclosed information regarding targets for reducing hazardous and non-hazardous waste include quantitative targets? No <input type="text"/>
Does the company's disclosed information regarding targets for reducing hazardous and non-hazardous waste include specific information on an implementation timeline? No <input type="text"/>

**Additional Comments**

NorthWestern's Environmental Policy includes a provision that we "strive to reduce generation of waste and promote the reuse and/or recycling of materials." Further, our newly established Sustainable Procurement and Practices Guidelines includes standards for reducing all waste. NorthWestern has an internal Waste Management Plan that includes information about hazardous waste generation and regulation, specific guidelines for management of various waste streams, specific guidelines on how to minimize each waste stream, training requirements, internal and regulatory reporting requirements, an internal environmental emergency response flowchart and other applicable information.

**References:**

 [Environmental Policy](#)

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# Human Rights

## Human Rights: Management Policies, Systems, and Disclosure

### Human Rights Policies, Systems, and Disclosure

Human Rights / Human Rights: Management Policies, Systems, and Disclosure / Human Rights Policies, Systems, and Disclosure

Publicly available information on human rights management policies, systems, and disclosure at NorthWestern Energy




Does the company disclose an enterprise level human rights policy? Yes <input type="text"/>
Does the company's human rights policy address the protection of minority groups' rights? Yes <input type="text"/>
Does the company's human rights policy address the protection of women's rights? Yes <input type="text"/>
Does the company's human rights policy specifically address the issue of human trafficking? Yes <input type="text"/>
Does the company's publicly disclosed human rights policy include a training element? Yes <input type="text"/>
Does the company explicitly identify the right to water as a fundamental human right in its environmental policy, human rights policy, or other policy document? Yes <input type="text"/>
Does the company disclose information on the applicability of its human rights policy to operations, suppliers, vendors, or partners? Yes <input type="text"/>
Is the company's human rights policy a global policy applying the same comprehensive standards to all company operations regardless of geographic location? Yes <input type="text"/>

Does the company indicate that it applies the same human rights policy standards to partners? Yes
Does the company indicate that it applies the same human rights policy standards to suppliers/vendors? Yes
Does the company's annual/integrated/sustainability report identify specific salient risks that its activities and business relationships pose on human rights? No
Does the company disclose strategies to prevent and mitigate identified risks? Yes
Does the company disclose a formal grievance reporting process for concerns related to human rights? Yes
Does the company's human rights or other formal policy cover community consultations and indigenous rights? Yes
Does the company's publicly disclosed human rights policy include a guarantee of free, prior and informed consent (FPIC)? No
Does the company's publicly disclosed human rights policy include a commitment to stakeholder involvement in the development of the policy, the implementation of the policy, and/or the evaluation of effective outcomes of the policy's implementation? Yes
Is the Board of Directors specifically mentioned as having responsibility for the company's human rights policy? No

**Additional Comments**

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

**References:**

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

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**Human Rights Policy and Public Conventions**

Human Rights / Human Rights: Management Policies, Systems, and Disclosure / Human Rights Policy and Public Conventions

Publicly available information about support for recognized public conventions in human rights policy

Does the company indicate that the company's human rights policy supports any specific recognized public convention? Yes <a href="#">Human Rights Policy</a>
Does the company's human rights policy have clear reference to conformance with the UN Universal Declaration of Human Rights? Yes
Does the company's human rights policy have clear reference to conformance with the OECD Guidelines for Multinational Enterprises? No
Does the company's human rights policy have clear reference to conformance with the UN Guiding Principles on Business and Human Rights? Yes

Additional Comments

NorthWestern Energy is not a multinational enterprise.

References:

[Human Rights Policy](#)

Aligned Frameworks/Raters

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## Human Rights/Corruption Controversy

Human Rights / Human Rights: Management Policies, Systems, and Disclosure / Human Rights/Corruption Controversy

Publicly available information on any controversy linked to human rights or corruption and response at NorthWestern Energy

If the company suffered a major controversy linked to human rights or corruption, has it failed to adopt an adequate remedial action?

Not Applicable

Additional Comments

As of May 19, 2023, NorthWestern Corporation is not aware of any relevant pending or active community and / or society controversies. NorthWestern Corporation is subject to various other legal proceedings, governmental audits and claims that arise in the ordinary course of business. IF there were any controversy, these issues would be disclosed in NorthWestern's most recent annual and quarterly filings with the SEC.

References:

[2022 Annual Report](#)

Aligned Frameworks/Raters

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## Supply Chain Standards

### Supply Chain Standards: Labor

Human Rights / Supply Chain Standards / Supply Chain Standards: Labor



Publicly available information on labor standards covered in supply chains at NorthWestern Energy

Does the company disclose that its supplier policy prohibits the use of child labor? Yes <input type="text"/>
Does the company disclose that its supplier policy prohibits the use of forced labor? Yes <input type="text"/>
Does the company's publicly disclosed Code of Vendor Conduct have clear reference to conformance with ILO standards? No <input type="text"/>
Does the company's publicly disclosed Code of Vendor Conduct address freedom of association? No <input type="text"/>
Does the company's publicly disclosed Code of Vendor Conduct address collective bargaining? No <input type="text"/>
Does the company's publicly disclosed Code of Vendor Conduct address working hours? Yes <input type="text"/>
Does the company disclose the priority non-conformance rate and associated corrective action rate for suppliers' compliance with health and safety policies? No <input type="text"/>

References:

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

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### Supplier Human Rights Audits

Human Rights / Supply Chain Standards / Supplier Human Rights Audits  
Publicly available information on audits of supplier human rights compliance at NorthWestern Energy

Does the company disclose an audit program to evaluate its suppliers' performance in the area of human rights (including human trafficking and slavery)? Yes <input type="text"/>
How frequently does the company conduct audits to evaluate suppliers' performance in the area of human rights? No <input type="text"/>
Does the company disclose the percentage of vendors subject to performance audits in the area of human rights in a given year? No <input type="text"/>
Does the company disclose the priority non-conformance rate and associated corrective action rate for suppliers' compliance with human rights policies? No <input type="text"/>
Does the company disclose programs in place to assist its suppliers in improving their performance in the area of human rights? No <input type="text"/>

References:

-  [Supplier Code of Conduct](#)

## Economic Inclusion - Suppliers

Human Rights / Supply Chain Standards / Economic Inclusion - Suppliers

Publicly available information on policies and practices to promote economic inclusion when selecting suppliers

Does the company disclose policies and practices used to promote economic inclusion when selecting suppliers? Yes <hr/>
Does the company disclose a program to screen its new suppliers for any of the following: environmental performance, labor practices or human rights performance? Yes <hr/>

Additional Comments

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

## Human Trafficking in Supply Chain

Human Rights / Supply Chain Standards / Human Trafficking in Supply Chain

Publicly available details on human trafficking and slavery in the supply chain for NorthWestern Energy

Does the company disclose information on efforts to address the risks of human trafficking and slavery in the supply chain? No <hr/>
Does the company disclose that it maintains internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and trafficking? Yes <hr/>
Does the company disclose that it provides training on human trafficking and slavery to its employees and management with direct responsibility for supply chain management? No <hr/>

References:

 [Human Rights Policy](#)

 [Supplier Code of Conduct](#)




## Ethical Sourcing

### Ethical Sourcing

Human Rights / Ethical Sourcing / Ethical Sourcing

Does the company's human rights or other publicly disclosed policy cover security arrangements? Not Applicable
Is the company a Corporate Participant to the Voluntary Principles on Security and Human Rights (VPSHR)? Not Applicable
Does the company disclose a specific policy on conflict minerals? Not Applicable
Does the company's policy on conflict minerals reference external standards, e.g., OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas? Not Applicable
Does the company's policy on conflict minerals include due diligence measures for tracing and sourcing? Not Applicable
Has the company published a conflict minerals report for the past fiscal year? Not Applicable
Does the company's conflict minerals report include information on the percentage of smelters and refiners within the supply chain that are verified "conflict-free" for tungsten? Not Applicable
Does the company's conflict minerals report include information on the percentage of smelters and refiners within the supply chain that are verified "conflict-free" for tin? Not Applicable
Does the company's conflict minerals report include information on the percentage of smelters and refiners within the supply chain that are verified "conflict-free" for tantalum? Not Applicable
Does the company's conflict minerals report include information on the percentage of smelters and refiners within the supply chain that are verified "conflict-free" for gold? Not Applicable

References:

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

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## Labor, Health, and Safety

### Labor Relations and Management

#### Labor Relations and Management

Labor, Health, and Safety / Labor Relations and Management / Labor Relations and Management

Does the company disclose an enterprise level workforce/labor rights policy? Yes <input type="text"/>
Does the company disclose a labor rights or other formal policy that encompasses freedom of association and the right to collective bargaining? Yes <input type="text"/>
Does the company's labor rights or other formal policy reference relevant conventions or standards, e.g., ILO 87 or 98? Yes <input type="text"/>
Does the company disclose an International Framework Agreement with a global union federation? No <input type="text"/>
If the company suffered a controversy linked to labor standards, has it failed to adopt an adequate remedial action? No <input type="text"/>
Does the company indicate that it applies the same workforce policy standards to suppliers/vendors? Yes <input type="text"/>
Does the company disclose the priority non-conformance rate and associated corrective action rate for suppliers' compliance with labor rights policies? No <input type="text"/>
Does the company disclose a labor rights certification program for suppliers? No <input type="text"/>

References:

 [Human Rights Policy](#) Page(s) 2

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## Employee Satisfaction

Labor, Health, and Safety / Labor Relations and Management / Employee Satisfaction  
Publicly available information on employee satisfaction at NorthWestern Energy

Does the company disclose that it monitors employee satisfaction or engagement? Yes <input type="text"/>
Does the company's quantitative metrics for employee engagement include a percentage value? Yes <input type="text"/>

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## Compensation and Benefits

### Compensation and Benefits

Labor, Health, and Safety / Compensation and Benefits / Compensation and Benefits

Publicly available information on compensation and benefits at NorthWestern Energy

Does the company state a commitment to a fair or living wage for all employees? Yes <input type="text"/>
If the company suffered a controversy linked to "living wage", has it failed to adopt an adequate remedial action? Not Applicable <input type="text"/>

References:

 [Code of Conduct and Ethics](#) Page(s)  
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## Occupational Health and Safety

### OHS Policy

Labor, Health, and Safety / Occupational Health and Safety / OHS Policy

Publicly available information on occupational health and safety policy at NorthWestern Energy .

Does the company disclose a policy that specifically addresses occupational health and safety? Yes <input type="text"/>
Does the company's occupational health and safety policy explicitly encompass all facilities and operations? Yes <input type="text"/>
Does the company's publicly disclosed occupational health and safety policy explicitly extend to suppliers? No <input type="text"/>

References:

 [Code of Conduct and Ethics](#)

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### OHS Performance

Labor, Health, and Safety / Occupational Health and Safety / OHS Performance

Publicly available information on occupational health and safety performance at NorthWestern Energy

Does the company disclose what percentage of the company's operations is certified to OHSAS 18001? Indicate percentage 0 <input type="text"/>
Does the company disclose information about OH&S performance, including injuries, occupational diseases, and work-related fatalities? No <input type="text"/>
Does the company's disclosed information regarding occupational health and safety performance include quantitative metrics? No <input type="text"/>
Do the company's occupational health and safety performance metrics include injury data? Yes <input type="text"/>
Do the company's occupational health and safety performance metrics include the Fatality Rate? Yes <input type="text"/>
Do the company's occupational health and safety performance metrics include the Near Miss Frequency Rate (NMFR)? No <input type="text"/>
Does the company disclose quantitative occupational health and safety performance metrics for full-time employees? No <input type="text"/>
Does the company disclose quantitative occupational health and safety performance metrics for contract employees? No <input type="text"/>
Does the company disclose quantitative occupational health and safety performance metrics for short-service, seasonal, or migrant employees? No <input type="text"/>
Do the company's occupational health and safety performance metrics cover all operations? Yes <input type="text"/>

Additional Comments

We have completed onboarding a vendors within the Avetta platform. This is a formalized process for contractor to provide NWE OSHA 300 and 300A information, which include fatalities. There are defined criteria and reveiws that occur at the vendor and company level. There is continued work to define exact requirements based on work performed.

References:

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

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**Efforts to Reduce OHS Incidents**

Labor, Health, and Safety / Occupational Health and Safety / Efforts to Reduce OHS Incidents

Publicly available information on efforts to reduce the occurrence of injuries, occupational diseases, and work-related fatalities at NorthWestern Energy .

Does the company disclose specific efforts for reducing the occurrence of injuries, occupational diseases, and work-related fatalities? No <hr/>
Does the company's disclosed information on reducing the occurrence of injuries, occupational diseases, and work-related fatalities include quantitative targets? No <hr/>
Does the company's disclosed information on reducing the occurrence of injuries, occupational diseases, and work-related fatalities include an implementation timeline? No <hr/>
Does the company disclose information on management systems used to integrate a culture of safety and emergency preparedness? No <hr/>

Additional Comments

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

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## Workforce Diversity and Equality

### Gender Diversity Strategy

Labor, Health, and Safety / Workforce Diversity and Equality / Gender Diversity Strategy  
Publicly available information on gender diversity strategy at NorthWestern Energy .

Does the company publicly disclose a gender diversity strategy or similar commitment to ensure appropriate gender representation at the board, senior management, or workforce levels? No <hr/>
Does the company publicly disclose a gender diversity strategy or similar commitment to ensure appropriate gender representation at the board level? No <hr/>
Does the company publicly disclose a gender diversity strategy or similar commitment to ensure appropriate gender representation at the senior management level? No <hr/>
Does the company publicly disclose a gender diversity strategy or similar commitment to ensure appropriate gender representation at the workforce level? No <hr/>

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### Diversity Strategy

Labor, Health, and Safety / Workforce Diversity and Equality / Diversity Strategy

Publicly available information on diversity strategy to ensure equality at NorthWestern Energy

Does the company publicly disclose a diversity strategy or similar commitment to ensure workforce equality beyond gender at the board, senior management, or workforce levels? Yes <hr/>
Does the company apply a diversity strategy (beyond gender) to the board level? Yes <hr/>
Does the company apply a diversity strategy (beyond gender) to the senior management level? Yes <hr/>
Does the company apply a diversity strategy (beyond gender) to the workforce level? Yes <hr/>

Additional Comments

Q387: 2 women were NEOs in 2020

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**Labor Rights Policy and Discrimination**

Labor, Health, and Safety / Workforce Diversity and Equality / Labor Rights Policy and Discrimination



Publicly available information on labor rights policies that address discrimination at NorthWestern Energy

Does the labor rights policy address discrimination (including gender, race, disability, ethnicity, nationality, religion, LGBTQ), workforce equality, or fair employment? Yes <input type="checkbox"/>
Does the company's labor rights policy address discrimination based on gender? Yes <input type="checkbox"/>
Does the company's labor rights policy address discrimination based on race? Yes <input type="checkbox"/>
Does the company's labor rights policy address discrimination based on disability? Yes <input type="checkbox"/>
Does the company's labor rights policy address discrimination based on ethnicity? Yes <input type="checkbox"/>
Does the company's labor rights policy address discrimination based on nationality? Yes <input type="checkbox"/>
Does the company's labor rights policy address discrimination based on religion? Yes <input type="checkbox"/>
Does the company's labor rights policy address discrimination based on sexual orientation? Yes <input type="checkbox"/>
Does the company's labor rights policy address discrimination based on gender identity or gender expression? Yes <input type="checkbox"/>

Additional Comments

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

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Diversity Disclosures

Labor, Health, and Safety / Workforce Diversity and Equality / Diversity Disclosures


Publicly available information on diversity at NorthWestern Energy

Does the company publicly disclose data on workforce equality connected with gender, race, disability, ethnicity, nationality, religion, LBGTO, or other potentially-protected classes? Yes <input type="checkbox"/> <a href="#">Key Sustainability Statistics Report</a>
Does the company's disclosed information on workforce equality include data on equality for the board? Yes <input type="checkbox"/>
Does the company's disclosed information on workforce equality include data on equality for senior management? Yes <input type="checkbox"/>

Does the company's disclosed information on workforce equality include data on equality for the workforce? Yes <input type="checkbox"/>
Does the company provide workforce demographic disclosure? Yes <input type="checkbox"/>
Does the company's disclosed information on workforce demographics include race? Yes <input type="checkbox"/>
Does the company's disclosed information on workforce demographics include age? Yes <input type="checkbox"/>
Does the company's disclosed information on workforce demographics include ethnicity? Yes <input type="checkbox"/>
Does the company's disclosed information on workforce demographics include gender? Yes <input type="checkbox"/>
Does the company provide workforce disclosure on gender and racial/ethnic group representation? Yes <input type="checkbox"/>
3BL Media only: Does the company disclose the percentage of women for executives and senior management? Yes <input type="checkbox"/>
3BL Media only: Does the company disclose the percentage of women across the total workforce? Yes <input type="checkbox"/>
Does the company disclose information on gender and racial/ethnic group representation across the total workforce? Yes <input type="checkbox"/>
Does the company disclose information on gender and racial/ethnic group representation for executives and senior management? Yes <input type="checkbox"/>
Does the company disclose information on gender and racial/ethnic group representation for professionals or technical staff? Yes <input type="checkbox"/>
Does the company disclose information on gender and racial/ethnic group representation for non-contingent staff? Yes <input type="checkbox"/>
Does the company disclose information on gender and racial/ethnic group representation for contingent staff? No <input type="checkbox"/>

Additional Comments  
Q387: 2 women were NEOs in 2020

References:

-  [2022 Proxy Statement](#) Page(s) 49-53
-  [Key Sustainability Statistics Report](#)

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**Training and Development**

## Training and Development

Labor, Health, and Safety / Training and Development / Training and Development

Publicly available information on training and development opportunities at NorthWestern Energy

What is the scope of the company's disclosed training or professional development programs for employees?

NorthWestern Energy provides a broad range of training for employees including safety, technical and compliance training along with personal, professional, leadership and management development opportunities. We have structured training plans for new hires, new supervisors and for individual job groups. We offer a robust job-specific and broad based safety training program along with an intensive new supervisor training program covering a broad range of topics including but not limited to EQ, business acumen, legal compliance and management techniques. Our Leadership NorthWestern Program is a year-long business acumen and networking opportunity open to all employees to apply. We are proud that the program brings together groups of employees from varying locations, functions, job titles and levels together, teaching them about the business and creating executive accessibility and even board accessibility as part of the experience. Our education reimbursement program is open to all employees and our training content is open access to all employees via our learning management system. We recognize newly obtained certifications with a monetary reward and support professional association membership dues. We offer pre-apprentice programs and apprentice programs for a variety of careers including power line and natural gas trades. Our employees are encouraged to be active in industry associations such as WEI, EEI, MEA, CEWD, and NCEA, as examples, regularly serving in leadership roles, committees and participating in educational opportunities. We fund a variety of annual external development opportunities, such as the University of Idaho Energy Executive Course, at the corporate level, and also maintain training budgets managed at the department level. We hold annual strategy sessions for the top two levels of leadership, providing access to outside speakers and thinking on important topics, and also host in-person full leadership team meetings that include developmental topics. We provide leadership development including Franklin Covey topics such as the Speed of Trust, Multipliers, 4 Essential Roles of Leadership and the 6 Critical Practices for Leading a Team. In addition to our engagement action plans, we also focus on leadership development in Psychological Safety as well as Diversity, Equity and Inclusion training covering topics including unconscious bias and inclusion. We publish a weekly supervisor briefing that includes a development topic and associated resources. We offer multiple mentoring opportunities through a variety of internal and external programs, and on an ad hoc basis, with employees acting in the capacity of either mentors or mentees.

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## Product Safety, Quality, and Brand

### Product Quality and Safety

#### Product Quality and Safety

Product Safety, Quality, and Brand / Product Quality and Safety / Product Quality and Safety

Publicly available information on customer satisfaction and product safety at NorthWestern Energy

Does the company disclose information about customer satisfaction or retention?
Not Disclosed
Does the company disclose information on the number of product recalls and total units recalled?
Not Applicable

#### Additional Comments

Our customer satisfaction information is publicly available through JD Power, so the Company does not disclose it.

### Aligned Frameworks/Raters

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## Supply Chain Standards

### Code of Vendor Conduct: Supply Chain Audits

Labor, Health, and Safety / Supply Chain Standards / Code of Vendor Conduct: Supply Chain Audits

Publicly available information on the Code of Vendor Conduct and supply chain audits.

Does the company's publicly disclosed Code of Vendor Conduct address supply chain audits for product safety? No <input type="text"/>
Does the company publicly disclose a Code of Vendor Conduct? Yes <input type="text"/>
Does the company's publicly disclosed Code of Vendor Conduct address generic supply chain audits? No <input type="text"/>

References:

 [Supplier Code of Conduct](#)

**Aligned Frameworks/Raters**

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## Ethical Marketing and Communication

### Ethical Marketing and Communication

Product Safety, Quality, and Brand / Ethical Marketing and Communication / Ethical Marketing and Communication

Publicly available information on ethical marketing and labeling at NorthWestern Energy

Does the company provide information on notices of violations received for nonconformance with regulatory labeling and/or marketing codes? Not Applicable <input type="text"/>
Does the company disclose the amount of legal and regulatory fines, settlements, and enforcement actions associated with false, deceptive, or unfair marketing, labeling, and advertising? Not Applicable <input type="text"/>

**Aligned Frameworks/Raters**

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## Stakeholder and Society

### Stakeholder and Society: Management Policies, Systems, and Disclosure

#### United Nations Global Compact

Stakeholder and Society / Stakeholder and Society: Management Policies, Systems, and Disclosure / United Nations Global Compact

Publicly disclosed information on the company's participation in the UN Global Compact.

Is the company a participant to the UN Global Compact? No <input type="text"/>
If the company is a participant to the UN Global Compact, when did the company become a participant to the UN Global Compact? <input type="text"/>

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## Sustainability and CSR Reports

Stakeholder and Society / Stakeholder and Society: Management Policies, Systems, and Disclosure / Sustainability and CSR Reports

Does the company report sustainability metrics in accordance with the Global Reporting Initiative (GRI)? No
Which is the most recent year the company has reported sustainability metrics in accordance with the GRI?
Does the company have any public reports (regardless of standard) or information on its website equivalent to that found in a CSR/EHS report? Yes
<a href="#">Key Sustainability Statistics Report</a> <a href="#">Sustainability Portal (ESG Website)</a>
What is the filing date of the company's most recent CSR report/material? July 2022
Does the company provide external assurance or independent verification of its sustainability disclosures? No











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## Sustainability Management and Oversight

### Sustainability Management and Oversight

Stakeholder and Society / Sustainability Management and Oversight / Sustainability Management and Oversight

<p>Does the company disclose that its board has a formal schedule for consideration of environmental, health and safety, and social matters?</p> <p>Yes</p> <p> <a href="#">2023 Proxy Statement</a> Page(s) Various</p>
<p>Does the company disclose the existence of a dedicated Environment, Corporate Social Responsibility, Health and Safety, or Sustainability board committee?</p> <p>Yes</p> <p> <a href="#">SETO Committee Charter</a></p> <p> <a href="#">Nominating and Governance Committee Charter</a></p> <p> <a href="#">2023 Proxy Statement</a> Page(s) Various</p>
<p>Does the company disclose that its Environment, Corporate Social Responsibility, Health and Safety, or Sustainability committee has oversight of policies and operational controls of environmental, health and safety, and social risks?</p> <p>Yes</p> <p> <a href="#">SETO Committee Charter</a></p> <p> <a href="#">Nominating and Governance Committee Charter</a></p>
<p>Does the company's Environment, Corporate Social Responsibility, Health and Safety, or Sustainability committee report directly to the board of directors or is it chaired by a named board member?</p> <p>Yes</p> <p> <a href="#">SETO Committee Charter</a> Page(s) 1-3</p> <p> <a href="#">Nominating and Governance Committee Charter</a></p>
<p>According to company disclosure, how many times did the Environment, Corporate Social Responsibility, Health and Safety, or Sustainability committee meet in the most recent fiscal year?</p> <p>5</p> <p> <a href="#">2023 Proxy Statement</a> Page(s) 52</p>
<p>Does the company disclose whether its Environment, Corporate Social Responsibility, Health and Safety, or Sustainability committee meetings in the most recent fiscal year well attended?</p> <p>Yes</p> <p> <a href="#">2023 Proxy Statement</a> Page(s) 52</p>

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## Motivation and Accountability

### Motivation and Accountability

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Does the company provide information indicating a link between consideration of ESG risks and performance, and executive remuneration?
Not Applicable
Does the company disclose specific non-financial targets in executive compensation plans?
Not Applicable
Does the company indicate that strategic ESG-related key performance indicators (KPIs) in the company plan are represented in the compensation or remuneration metrics?
Not Applicable
Does the compensation policy explicitly reference specific science-based targets for reducing GHG emissions with a reference to the 2°C scenario?
Not Applicable
Has the company explained how the variable pay award, dependent on nonfinancial performance, was assessed for the year under review?
Not Applicable
If the company suffered a major controversy, is any increase in salary or bonus proposed for the directors employed at the time of the incident?
No

References:


 [2023 Proxy Statement](#) Page(s) 15-36

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## Business Ethics and Anti-corruption









### Business Ethics and Anti-Corruption

Stakeholder and Society / Business Ethics and Anti-corruption / Business Ethics and Anti-Corruption  
Publicly available information on business ethics and anti-corruption policies at NorthWestern Energy

Does the company have a publicly disclosed Business Ethics Policy or Code of Conduct?
Yes
 <a href="#">Code of Conduct and Ethics</a>
Does the company actively monitor/audit internal compliance with its Business Ethics Policy or Code of Conduct?
Yes
Does the company's publicly disclosed Business Ethics Policy or Code of Conduct extend to include suppliers?
Yes
Does the company disclose processes or strategies for monitoring supplier compliance with its Business Ethics Policy or Code of Conduct?
Yes
Does the company disclose the priority non-conformance rate and associated corrective action rate for suppliers' compliance with its Business Ethics Policy or Code of Conduct?
No
What is the company's percentage of suppliers audited for compliance with its Vendor or Supplier Code of Conduct, or its Business Ethics Policy or Code of Conduct?
0

<p>What is the highest level of executive oversight for the company's anti-bribery or anti-corruption program?</p> <p>Board Audit Committee Chair</p>
<p>Does the company's publicly disclosed anti-bribery or anti-corruption policy specifically prohibit personnel from receiving and giving gifts, bribes, or facilitation payments?</p> <p>Yes</p>
<p>Does the company disclose that it provides anti-corruption training to all employees, including management?</p> <p>No</p>
<p>Does the company disclose the existence of a confidential hotline and stated protection of whistleblowers?</p> <p>Yes</p>
<p>Does the company's disclosed information on internal monitoring, whistleblower, or reporting systems include metrics related to the number of inquiries, complaints, or issues received by the legal or compliance office?</p> <p>No</p>
<p>Has the company disclosed that it has obtained independent accreditation of its anti-bribery or anti-corruption program?</p> <p>No</p>
<p>Does the company disclose the amount of legal and regulatory fines, and settlements associated with violations of bribery, corruption, or anti-competitive standards?</p> <p>No</p>
<p>Does the company describe its management system for prevention of corruption and bribery throughout the value chain?</p> <p>Yes</p>

References:

-  [Supplier Code of Conduct](#)
-  <https://www.northwesternenergy.com/docs/default-source/default-source/default-source/...>
-  [Anti-Fraud Policy](#)
-  [Code of Conduct Internal Investigation Policy](#)
-  [Conflicts of Interest and Gifts Policy](#)
-  [Corporate Political Contributions Policy](#)
-  [Antitrust Policy](#)
-  [Code of Conduct and Ethics](#)

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**Country-by-Country Payments and Financial Information**

Stakeholder and Society / Business Ethics and Anti-corruption / Country-by-Country Payments and Financial Information



Does the company disclose country-by country tax payments? Not Applicable <hr/>
Does the company disclose country-by country financial information? Not Applicable <hr/>
Does the company disclose country-by country information on turnover/revenue? Not Applicable <hr/>
Does the company disclose country-by country information on profit or loss before taxes? Not Applicable <hr/>
Does the company disclose country-by country information on number of employees? Not Applicable <hr/>
Does the company disclose country-by country payments to governments? Not Applicable <hr/>

Additional Comments

Tax payments to U.S. governmental agencies are detailed in our FERC Form 1 Financial Reporting

References:

 [2022 FERC Form 1 Report](#) Page(s) 262-278

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## Lobbying and Political Advocacy

### Lobbying and Political Advocacy

Stakeholder and Society / Lobbying and Political Advocacy / Lobbying and Political Advocacy

Does the company have a publicly disclosed policy relating to the use of company funds for political purposes? Yes
Does the company publicly disclose information on the use of corporate funds for the purposes of political advocacy, including lobbying, campaign contributions, and contributions to tax-exempt groups including trade associations? Yes
3BL Media only: Amount spent on political advocacy normalized
Does the company's disclosed information related to political advocacy include the amounts spent on political advocacy? Yes
Does the company's disclosed information related to political advocacy include the recipients? Yes
Does the company's disclosed information related to political advocacy include, at a minimum, the five largest political, lobbying, or tax-exempt group expenditures? Yes
Does the company's disclosed information related to political advocacy include a discussion of the objectives related to the use of company funds for political advocacy? Yes

References:

 [Corporate Political Contributions Policy](#)

 [Code of Conduct and Ethics](#)

Page(s)  
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## Consultation and Engagement

### Consultation and Engagement

Stakeholder and Society / Consultation and Engagement / Consultation and Engagement

Does the company disclose a formal system to implement stakeholder consultation and engagement?

Other Please specify: We have engaged with our stakeholders in deep discussions about investment in the critical infrastructure that serves our states, helping guide hundreds of millions of dollars in investment in electric and gas transmission and distribution systems and technology. We work with local, state and federal agencies as well as affected non-governmental organizations, consumer advocates and concerned citizens to develop collaborative solutions to a variety of issues.

 [Stakeholder Engagement](#)

Does the company disclose information about stakeholder engagements carried out during the past year?

Yes

 [Missouri-Madison River Fund Grant](#)

 [Helping Create a Bright Future](#)

 [How You Can Help](#)

 [Save Energy and Money](#)

 [Our Environmental Projects](#)

 [Economic Development](#)

 [O'Dell Creek Restoration](#)

 [Our Project](#)

 [Regulatory Engagement](#)

 [BRIGHT Magazine](#)

#### Additional Comments

Balancing our primary stakeholder interests is critical to NorthWestern's success.

Customers: Improve customer satisfaction by understanding and exceeding customer expectations.

Investors: Create sustainable shareholder value by meeting targeted financial results and improving total shareholder return.

Employees: Foster a culture that results in a safe, equitable, inclusive, and rewarding working environment.

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