



Supplier Code of Conduct

INTRODUCTION

At ALLETE, Inc. and its subsidiaries (collectively, "ALLETE"), our culture drives excellence through our shared values, which we live every day. These values are as follows:

- **Integrity**—*We conduct ourselves honestly and ethically—integrity is the foundation of all we do.*
- **Safety**—*We commit to be injury free at work, at home and in our communities.*
- **People**—*We care about others, respect our differences and create opportunities for **everyone** to thrive.*
- **Planet**—*We are building a cleaner, better world.*

ALLETE is committed to doing business ethically, with integrity, and in compliance with all applicable laws, regulations, and industry standards. ALLETE expects its business partners, including all contractors, vendors, and suppliers of goods and services and their employees, agents, and subcontractors (collectively, "Suppliers"), to embody these values and to act ethically and with integrity, in accordance with [ALLETE's Code of Business Conduct](#). This Supplier Code of Conduct outlines ALLETE's expectations, and any failure to comply with these minimum requirements may jeopardize a Supplier's relationship with ALLETE.

BUSINESS PRACTICES

ALLETE's Suppliers must act with integrity and in accordance with the highest ethical standards. At a minimum, this requires compliance with all applicable laws, regulations, and rules, as well as a commitment to strong governance practices and transparency in all business activities.

Anti-Corruption: ALLETE has a zero-tolerance policy with respect to bribery and corruption. Suppliers shall not exercise improper influence or directly or indirectly offer, give, or promise money or any other thing of value (including facilitation payments, gifts, meals, entertainment, or other business courtesies and benefits, regardless of value) to any individual for an improper purpose. Similarly, Suppliers shall not solicit or accept any bribes, kickbacks, or other improper payments.

Gifts and Entertainment: Suppliers shall not offer, give, promise, solicit, or accept any gifts, meals, entertainment, travel, or other business courtesies or benefits unless there is a legitimate business reason for doing so and the situation does not give rise to even an appearance of impropriety. All business courtesies and benefits given and received must be lawful, reasonable, and consistent with industry standards.

Conflicts of Interest: When dealing with ALLETE, Suppliers must remain free of any improper influences that stem from personal, business, or other arrangements or relationships that could create a conflict of

interest. Any potential conflicts must be promptly disclosed to ALLETE so that appropriate remedial actions can be taken.

Conflict Minerals: Products provided to ALLETE shall not contain any cassiterite, columbite-tantalite, gold, wolframite, tantalum, tin, or tungsten sourced from the Democratic Republic of Congo or any adjoining countries, unless the Supplier can demonstrate that the minerals used in their products did not directly or indirectly finance or benefit any armed groups in those countries. Suppliers shall take reasonable steps to track the source of the minerals used in their products and shall provide the source and a description of the Supplier's tracking process to ALLETE upon request.

Competition and Fair Dealing: Suppliers shall not enter into anti-competitive agreements, engage in unfair pricing or unfair marketing, misrepresent their products or services, or otherwise seek to undermine free and fair competition in violation of applicable antitrust and competition laws. All information regarding a Supplier's products and services must be accurate and truthful. Misleading statements intended to gain a competitive advantage and disparaging or untrue statements about competitors are prohibited.

Use of ALLETE's Information and Assets: In some instances, Suppliers may have access to ALLETE's facilities, equipment, systems, information, or other assets. Suppliers shall comply with the terms of any agreements governing the use of such assets and shall take all appropriate steps to protect them from damage, loss, misuse, theft, or unauthorized access. In particular, confidential information may only be used for legitimate business purposes and must never be shared with third parties unless specifically authorized by ALLETE. Suppliers shall not use ALLETE's logo, trademarks, or service marks without written authorization.

Financial Integrity: In accordance with applicable laws and accepted accounting practices, Suppliers shall implement internal controls over financial reporting and maintain accurate and complete books and records that fairly reflect all transactions. All contracts and invoices shall accurately and in reasonable detail describe the goods and services provided to ALLETE. False, incomplete, or misleading business records are unacceptable.

Product Quality and Performance: Suppliers shall respect all contracts with ALLETE and deliver goods and services on time and to the agreed-upon specifications. All goods must comply with applicable quality, safety, and labeling requirements.

HUMAN RIGHTS, WORKING CONDITIONS, AND THE RIGHTS OF SUPPLIER EMPLOYEES

ALLETE's Suppliers must respect the dignity and human rights of those associated with and impacted by their operations. At a minimum, this requires compliance with all applicable laws, regulations, and standards regarding labor rights, employment practices, and working conditions.

Human Rights: Suppliers shall employ only people who are legally authorized to work and who choose to do so voluntarily. Slavery, forced or coerced labor as defined by the International Labor Organization, bonded labor, indentured servitude, involuntary prison labor, or any other form of exploitation is strictly prohibited. Suppliers' employees shall not be subject to unreasonable restrictions on movement within

the workplace, and Suppliers shall not withhold their employees' identification or travel documents. Suppliers shall not engage in or support any form of human trafficking. Suppliers shall verify the age of all prospective employees and shall not use child labor in violation of any applicable laws establishing a minimum employment age.

Wages, Benefits, and Hours of Work: Suppliers shall fully comply with all applicable labor and employment laws and regulations, including all applicable wage laws, as well as the terms of any collectively bargained agreements. Their employees shall be paid fair and competitive regular and overtime wages that meet or exceed mandatory minimum wages and are appropriate for the type of work being done. Similarly, Suppliers shall provide their employees with all legally mandated benefits. No employee of a Supplier shall be required to work excessive hours, and employees shall be afforded regular, reasonable time off of work. Wage deductions shall not be used as a disciplinary measure.

Health and Safety: Suppliers shall provide a clean, safe, and secure working environment. All facilities must comply with applicable health and safety laws and regulations. Suppliers shall proactively identify and address workplace hazards and shall provide appropriate health and safety-related training. In addition, Suppliers shall implement emergency preparedness measures and take appropriate steps to protect their employees from violence and threats of violence during work.

Dignity and Respect: Suppliers shall treat all of their employees fairly and with dignity and respect. Suppliers' employees shall not be subjected to abusive, harassing, coercive, hostile, insulting, intimidating, offensive, threatening behavior in the workplace. Suppliers shall not unlawfully discriminate against current or prospective employees based on any protected status. Suppliers shall comply with applicable privacy laws and regulations and reasonably respect the privacy rights of their employees and any other parties with whom they do business.

Freedom of Association: Consistent with applicable laws and regulations, Suppliers shall respect the legal rights of their employees to choose whether or not to join a trade union, workers' organization, or any other similar group and to collectively bargain if they choose to be represented.

ENVIRONMENTAL STEWARDSHIP AND SUSTAINABILITY

ALLETE actively seeks suppliers that share our commitment to protecting the environment. Suppliers must abide by the letter and the spirit of all federal, state and local environmental laws, as well as applicable ALLETE policies and procedures.

Permitting and Compliance: Suppliers shall obtain, maintain, and adhere to all environmental permits required for their operations. In addition, Suppliers must comply with all applicable environmental laws and regulations, including, but not limited to, those relating to management of emissions, hazardous substances, wastewater, and solid waste.

Sustainability: Suppliers shall strive to maximize efficiency, reduce waste, and conserve the natural resources used in their operations, including water and energy. To the extent possible, Suppliers shall implement active reuse and recycling programs and participate in community efforts to protect and preserve natural resources.

COMPLIANCE WITH THIS CODE AND ADDITIONAL INFORMATION

Mandatory Compliance and Scope: Suppliers' compliance with the ALLETE Code of Business Conduct and this Code is a condition of doing business with ALLETE. Importantly, the minimum requirements set forth herein apply throughout the supply chain. Suppliers shall communicate these requirements to — and require compliance by — their parent companies, subsidiaries, affiliates, directors, officers, employees, and any other parties that support their business activities with ALLETE, such as consultants or subcontractors.

Suppliers' Compliance Program: Suppliers shall take steps to ensure their compliance with this Code, including implementing an ethics and compliance program that is reasonably designed to address all relevant topics. A compliance program is expected to include features including a management commitment to ethical business practices and compliance with applicable laws and regulations, appropriate policies, procedures, as well as internal controls, training for employees, mechanisms for employees and others to raise concerns without fear of retaliation, and processes to promptly remedy any non-compliance with this Code, or the ALLETE Code of Business Conduct, identified by Suppliers or ALLETE. ALLETE reserves the right to conduct audits and compliance investigations, including Supplier site visits, to verify that a supplier's business operations meet the expectations outlined in this code. Suppliers and their employees are expected to fully cooperate in any audit or compliance investigation. Deficiencies may result in a request to remove a worker from an ALLETE site, a remediation plan, or termination of the business relationship. These expectations are intended to supplement, not replace or supersede, requirements established by contract, policy, or Supplier's own ethical standards and compliance guidelines.

Verification and Remediation: ALLETE reserves the right to verify compliance with this Code. To that end, Suppliers shall maintain documentation to demonstrate their compliance and provide such documentation and any other relevant information to ALLETE upon request.

Raising Questions and Reporting Concerns: Suppliers shall promptly inform ALLETE of any non-compliance or suspected non-compliance of this Code. Reports can be made directly to the Suppliers' ALLETE business representative. In addition, Suppliers can, anonymously if desired, ask questions or submit information about potential non-compliance with this Code or any other ethics and compliance issues related to ALLETE's business, using the ALLETE Integrity Helpline . The ALLETE integrity Helpline is administered by an independent provider, is available 24 hours a day, 365 days a year, and can be accessed in any of the following ways:

Telephone: 1-866-776-6951 (toll-free)

Internet: <https://allete.ethicspoint.com>

ALLETE forbids retaliation against anyone who reports in good faith any suspected illegal or unethical conduct.