



## **Vendor Code of Conduct**

### **I. Overview**

Guided by the Company's vision of energizing lives for a better tomorrow, MDU Resources Group, Inc. and its subsidiaries (collectively, the "Company") are committed to responsible business practices. The Company's mission clearly expresses this commitment: with integrity, deliver value as a leading energy provider and employer of choice. Achieving this mission requires alignment with the Company's core values—integrity, safety, respect, excellence, and stewardship. Integrity—the Company's foundational core value—must guide every decision it makes. The Company's code of business conduct, entitled the Leading With Integrity Policy, reflects the Company's core values and guides all employees, Board members, and director emeriti in ethical decision-making. Similarly, any third-party vendor, supplier, contractor, or subcontractor that has a contractual relationship with the Company along with the employees, agents, and representatives of such entities, and including any lower-tier subcontractors or sub-suppliers retained by a Vendor in the course of doing work or providing services to the Company (collectively, "Vendors" or each, a "Vendor") are expected to adhere to these values and apply them to how they do business under this Vendor Code of Conduct.

### **II. Purpose**

The purpose of this Vendor Code of Conduct is to clarify the Company's expectations regarding the conduct of Vendors with whom it does business.

### **III. Legal and Regulatory Compliance**

Vendors must comply with both the letter and spirit of all applicable laws and regulations. Following the law is the minimum standard of conduct and is expected of everyone. No one has the authority to break a law or tell other people to break a law on behalf of the Company.

When doing business in other countries, Vendors must follow local law and any U.S. law that applies to international operations, including but not limited to the Foreign Corrupt Practices Act.

### **IV. Safety and Health**

The Company's safety program's primary goals are to prevent accidents and injuries and provide safe working conditions. The Company is committed to safety and adheres to workplace safety laws and regulations. Vendors must also comply with all applicable workplace safety laws and regulations and implement an occupational health and safety management strategy. Vendors are expected to use required safety equipment, follow proper safety procedures, and use good judgment and common sense to protect themselves, their co-workers, Company employees and property, and the public from injury.

### **V. Environmental Stewardship**

The Company's Environmental Policy requires it to operate efficiently to meet the needs of the present without compromising the ability of future generations to meet their needs. The Company seeks to work with Vendors that are committed to minimizing waste and maximizing resources, and that seek to be good stewards of the environment while providing high-quality and reasonably priced products and services. Vendors are expected to comply with or surpass all applicable environmental laws, regulations, and permit requirements. Vendors are expected to share the Company's environmental commitments, which include

operating in a manner that seeks to reduce greenhouse gas emissions and other environmental impacts, and helps protect natural resources.

## **VI. Conflicts of Interest**

The Leading With Integrity Policy identifies certain situations involving Vendors that may constitute a conflict of interest. Company employees are forbidden from holding a significant financial interest (defined as 5% ownership or greater) in any company or other organization that does business or wants to do business with the Company, unless this relationship is disclosed to the Company and the business relationship has been approved in accordance with Company policy.

Potential conflicts of interest may arise in other situations, such as when a Vendor employs someone who is also an employee of the Company or someone who has a close personal relationship with an employee of the Company. Vendors are expected to report any suspected conflict of interest to the Company as soon as reasonably possible after the conflict is discovered.

## **VII. Business Records**

Accurate and reliable business records are critical to meeting the Company's financial reporting and legal obligations. Vendors are expected to prepare required reports and invoices promptly, completely, and accurately. Vendors must follow all applicable laws and contractual requirements in creating, maintaining, and disposing of records reflecting their business dealings with the Company.

## **VIII. Cybersecurity and Data Protection**

Vendors are expected to protect the Company's confidential information. Vendors must adopt and maintain processes to provide reasonable protections for personal, proprietary, and confidential information, including information that they access, receive, or process on behalf of the Company. Vendors must comply with all applicable privacy, data protection, and information security laws and regulations.

Vendors who provide cloud computing services or other forms of third-party information technology and information technology support must adhere to the specific control requirements required by the Company's Enterprise Information Technology policies, as applicable.

## **IX. Employment Conditions**

Vendors are expected to comply with all applicable equal employment opportunity and affirmative action laws.

Vendors are expected to provide a work environment that is free of discrimination and unlawful harassment, including but not limited to discrimination or harassment based on age, race, color, religion, sex, sexual orientation, gender identity, national origin, disability, veteran status, or genetic information.

Vendors are expected to comply with wage and hour laws and other statutes that regulate the employer/employee relationship and the work environment, including laws prohibiting retaliation against employees who invoke their rights under labor and employee relations laws.

## **X. Human and Labor Rights**

Vendors are expected to share the Company's commitment to human and labor rights. This includes prohibiting the use of child labor, in accordance with the relevant International Labor Organization (ILO) Core Conventions; prohibiting the use of forced labor; respecting freedom of association; respecting the right of collective bargaining; and prohibiting discrimination.

## **XI. Fair Labor Standards**

Vendors are expected to share the Company's commitments to fair labor standards. This includes providing employees with documentation on wages; paying overtime at a premium rate; prohibiting disciplinary or unlawful wage deductions; and not exceeding the maximum weekly working time in accordance with applicable law.

## **XII. Fair Competition**

Vendors are expected to comply with antitrust laws and avoid any anti-competitive behavior. This includes avoiding illegal arrangements with dealers, suppliers, customers, or competitors that restrict the Company's ability to compete with other businesses or the ability of other businesses to compete with the Company. Vendors are also expected to avoid practices intended to increase the use of their own or the Company's services except through fair marketing based on price, quality, product features, and service. The Company does not use or tolerate unfair or deceptive marketing practices.

The Company's gift policy requires Company employees to avoid conflicts of interest and the appearance of special influence, obligation, or preferential treatment for one party over another. Vendors are expected to avoid any action that could be construed as an attempt to unduly influence a Company employee.

## **XIII. Trademarks and Copyrights**

The Company respects the intellectual property rights of others and expects Vendors to respect the intellectual property rights of the Company and third parties. Unauthorized use of the Company's intellectual property by any Vendor, including copyrighted materials, is prohibited.

## **XIV. Politics and Government**

Vendors are expected to follow all applicable laws regarding political contributions and to avoid providing any government official with any personal gift, loan, lavish entertainment, or other payment that might be considered a payoff, bribe, or improper influence as it pertains to Company business.

## **XV. Artificial Intelligence**

The Company promotes responsible use of Artificial Intelligence ("AI") and expects Vendors to share its commitment to endeavoring to ensure that the AI systems built, purchased, or used via third-party applications are lawful, unbiased, equitable, safe, secure, and respect employee, customer, supplier, and third-party privacy and transparency.

## **XVI. Compliance**

Vendors are expected to report actual or suspected noncompliance with this Vendor Code of Conduct by Company employees or by any Vendor. Reports may be submitted using the following resources:

### **24/7 Ethics Hotline**

1-866-294-4676  
ethics.mdu.com

### **Chief Legal Officer and Corporate Secretary**

chieflegalofficer@mduresources.com  
701-530-1000

### **Internal Auditing**

auditing@mduresources.com  
701-530-1000

### **Audit Committee**

Audit Committee of the  
MDU Resources Group, Inc.  
Board of Directors  
c/o Chief Legal Officer and  
Corporate Secretary  
1200 West Century Avenue  
Bismarck, North Dakota 58503