



CONTRACTOR CODE OF BUSINESS ETHICS

INTRODUCTION

Otter Tail Power Company (the “Company”) believes in integrity and honesty in all workplace relationships. The decisions we make and the actions we take with each other and our customers are vitally important in maintaining our hard-earned reputation.

The actions of our contractors, consultants, suppliers, and vendors and their employees, agents, and subcontractors (hereinafter referenced as “Contractor” or “You”) are a representation of who we are. We expect the people and companies with which we conduct our business to reflect our values.

As a Company Contractor, you are obligated to abide by this policy and follow its principles of conduct. Contractors doing business with the Company are also expected and required to conduct business in accordance with all applicable laws, rules, and regulations.

If you have doubts or questions regarding this Contractor Code of Business Ethics or a situation arising under, please contact your Otter Tail Power Company Representative.

WORKPLACE SAFETY AND HEALTH

You are expected to maintain a safe and healthy workplace. If you are aware of unsafe working conditions, report the situation to your Otter Tail Power Company representative immediately.

Contractors may be asked to comply with the Otter Tail Power Company Contractor Safety Policy. The Company may also require special safety qualifications or certifications for certain work and may request Contractor safety data as part of its solicitation process.

THE ENVIRONMENT

The Company is committed to conducting business in an environmentally responsible manner. Contractors are required to comply with all applicable environmental laws and regulations and should operate in a way that minimizes the damage to the environment and to maintain sustainability. The Company encourages Contractors to share with us their practices to improve sustainability.

RESPECTFUL WORKPLACE

The Company is committed to maintaining a workplace and culture free from discrimination and harassment. The Company does not allow discrimination or harassment based on:

- Race, color, ethnic or national origin;
- Age;
- Religion or creed;
- Sex;
- Sexual orientation;
- Gender, gender identity, gender expression, transgender status;
- Nationality, immigration status, citizenship, or ancestry;
- Marital status;
- Military or veteran status;
- Physical or mental disability, genetic information, or characteristics;
- Status as a victim of domestic violence, sexual assault, or stalking; or
- Any other basis prohibited under federal, state, or local laws.

As our contractors, consultants, suppliers, and vendors, we expect you to comply with all applicable laws and regulations related to discrimination and harassment in the workplace.

LABOR AND HUMAN RIGHTS STATEMENT

The Company respects and promotes human rights. Otter Tail Power Company will not engage in or support the use of child labor or indentured labor. Contractors are expected to comply with applicable child labor and forced labor laws.

Contractors are expected to ensure that their employees are free from undue risk or physical harm or exploitation and are compensated in accordance with all applicable wage and work hour laws and regulations.

All of the Company’s Contractors are expected to adhere to Otter Tail Corporation’s Human Rights Policy. The policy can be found at the following link: s1.q4cdn.com/276295446/files/doc_downloads/governance/2023/12/Human-Rights-Policy_FINAL.pdf. If you become aware of a violation of the Human Rights Policy, you must promptly report any violations or concerns to the Company as outlined on page 3.

EXPORT CONTROLS

Export controls and economic sanctions regulate where and with whom we can do business. The laws of more than one (1) country may govern a particular transaction. Failure to comply with these laws can seriously impact our Company and reputation, lead to significant fines, and can even result in the loss of our export privileges.

We are committed to ensuring that these business transactions are accomplished in full compliance with applicable sanctions or trade controls and laws. If you are involved in the transfer of goods or services across international borders on behalf of our Company or our customers, you must comply with these laws, regardless of where you are located.

DIVERSITY AND INCLUSION

We encourage diversity, equity, and inclusion. A wide variety of business relationships help us better reflect our customers and communities while providing economic growth opportunities. We encourage our Contractors to inform us of any Women-Owned, Minority, LGBTQ+, veteran certified designation, or Union Representation status they may possess.

CONFLICTS OF INTEREST

As our Contractor, you and your employees must avoid actual or potential conflicts of interest with the Company and its affiliates. Generally speaking, a conflict of interest is a situation where your personal interests as a Contractor could directly or indirectly conflict with the best interests of the Company or its affiliates.

This includes having:

- a significant financial interest in another company in our industry, such as a competitor;
- a family member or other close personal relative working for Otter Tail Power Company or its affiliates; or
- having access to Otter Tail Power Company's proprietary information while contracting with competitors.

Should an actual or potential conflict of interest arise, you are expected to immediately disclose it to your Otter Tail Power Company representative or affiliate contact.

RETALIATION/SPEAKING UP

The Company will not permit retaliation in any form because of information provided related to this Contractor Code of Business Ethics.

If you witness or know of a violation you are expected to promptly report it within thirty (30) days.

Otter Tail Corporation Helpline

Call: (800) 461-9330

SMS/Text: (218) 394-7272

Website Portal: coc.ottertail.com

If a situation arises, you can call or text the Otter Tail Corporation Helpline. You may contact this toll-free service 24 hours a day, seven (7) days a week, to discuss ethical concerns or to report information about a possible violation of this Contractor Code of Business Ethics. A trained specialist who is employed by an outside organization answers the Helpline and callers may remain anonymous if they wish, although identifying yourself allows us to act as quickly and appropriately as possible. You can also report a possible violation of this Contractor Code of Business Ethics through the Otter Tail Corporation Helpline website portal.

Information reported to the Company or the Helpline will be appropriately investigated and corrective action will be taken as necessary.

The Company appreciates and values your role as a Contractor and your adherence to this Contractor Code of Business Ethics. Thank you for helping Otter Tail Power Company meet its ethical obligations.



MISSION

To produce and deliver electricity as reliability, economically, and environmentally responsibly as possible to the balanced benefit of customers, shareholders, and employees and to improve the quality of life in the areas in which we do business.



VALUES

INTEGRITY: We conduct business responsibly and honestly.

SAFETY: We provide safe workplaces and require safe work practices.

CUSTOMER FOCUS: We provide reliable electricity and timely, courteous customer service.

RESOURCEFULNESS: We draw on the ingenuity and expertise of various resources to create strategic, balanced plans.

COMMUNITY: We improve the quality of life in the areas in which we do business.

PEOPLE: We build respectful relationships and create an environment where all people thrive.



OTTER TAIL CORPORATION HELPLINE

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Available 24 hours a day, 7 days a week (toll-free service)