
POLICY STATEMENTS
Policy No. 105.8
Harassment

Effective Date:
October 15, 2025

I. PURPOSE

MDU Resources Group, Inc. (the "Company") and its subsidiaries seek to provide employees with a positive work environment, free of all forms of harassment, including sexual harassment.

II. POLICY STATEMENT

The Company is committed to providing all employees with a positive work environment, free of all forms of harassment, including harassment based on age, race, color, religion, sex, sexual orientation, gender identity, national origin, disability, veteran status, or genetic information.

III. SCOPE

This policy ("Policy") shall cover all employees of the Company and its subsidiaries. See Addendum A for provisions specific to Oregon employees.

IV. PROCEDURE

A. **Harassment.** The Company will not tolerate any type of harassment in the workplace or while representing the Company outside of the workplace, including but not limited to harassment based on:

- | | |
|----------------------|-----------------------|
| • age | • gender identity |
| • race | • national origin |
| • color | • disability |
| • religion | • veteran status |
| • sex | • genetic information |
| • sexual orientation | |

Harassment includes, without limitation, verbal or written harassment (e.g. epithets, derogatory statements, slurs) including posts to social media, physical harassment (e.g. assault, physical interference with normal work), visual harassment (e.g. posters, photos, pictures, cartoons, drawings), and innuendo. Harassment that is directed at coworkers, as well as any other third party, including the employees of customers, suppliers, or competitors, is prohibited.

B. **Sexual Harassment.** The Company will not tolerate verbal or physical conduct of a sexual nature by any supervisor, employee, agent, contractor, or customer that harasses, disrupts, or interferes with an employee's or third party's work performance or that creates an intimidating, offensive, or hostile work environment.

POLICY STATEMENTS
Policy No. 105.8
Harassment

Effective Date:
October 15, 2025

- **Supervisors:** Each supervisor is responsible for maintaining a workplace free of any form of sexual harassment. In addition, no supervisor shall threaten or insinuate, either explicitly or implicitly, that an employee's refusal to submit to sexual advances will adversely affect the employee's employment, evaluation, compensation, advancement, assigned duties, or any other condition of employment or career development.
- **Individuals:** Sexual harassment will not be tolerated. Sexual harassment is generally defined as an unwelcomed action or conduct of a sexual nature. Examples include, but are not limited to:
 1. Flirtations, physical contact, advances, or propositions.
 2. Verbal comments or abuse of a sexual nature.
 3. Graphic or suggestive comments about an individual's dress or body.
 4. Sexually degrading words to describe an individual, offensive jokes, or comments of a sexual nature.
 5. Displaying sexually suggestive objects or provocative pictures.

Employees who work in positions that require them to interact with the public or who travel on behalf of the Company and are receiving remuneration for their travel and expenses, must comply with this policy at all times while interacting with the public and for the duration of their work-related travel.

- C. **Remedies.** An employee subjected to any form of harassment should first, if comfortable doing so, inform the harasser their conduct is unwelcome and unacceptable. If the conduct continues, is repeated or if the employee is not comfortable with informing the harasser, the employee should report the matter immediately to the appropriate supervisor, manager, the Human Resources department, or file a report through the Company's anonymous ethics hotline. All reports filed through the hotline should comply with CORP 86 – Complaint Reporting Policy and include all information necessary to facilitate an understanding of the facts, circumstances, or issues of concern. All complaints of harassment, both internal or external, will be investigated promptly, impartially, and confidentially, to the extent practicable under the direction of the Human Resources department. All employees, supervisors, and members of management shall cooperate fully with the investigation. Failure to cooperate or impeding the investigation will result in disciplinary action up to and including termination of employment. Human Resources shall be advised as soon as management becomes aware of the concern. The Company will advise the employee of the findings of, and conclusions of, the investigation. An employee or third party will not be subject to any form of retaliation or discipline for making a good faith report of harassment.

POLICY STATEMENTS
Policy No. 105.8
Harassment

Effective Date:
October 15, 2025

- D. **Actions.** An employee who is found, after appropriate investigation, to have engaged in harassment in violation of this policy will be subject to appropriate disciplinary action up to and including termination of employment. An employee who is found, after appropriate investigation, to have engaged in retaliation against another employee or third party for bringing forth a complaint of harassment pursuant to this policy will be subject to appropriate disciplinary action up to and including termination of employment. An employee who is found, after appropriate investigation, to have brought a claim of harassment pursuant to this policy that was not made in good faith will be subject to appropriate disciplinary action up to and including termination of employment. employees, supervisors and members of management shall cooperate fully with the investigation. Failure to cooperate or impeding the investigation will result in disciplinary action up to and including termination of employment.

V. ADMINISTRATION

The Chief Executive Officer has the overall responsibility for this policy. Administration of the policy is the responsibility of the Chief Human Resources, Administration, and Safety Officer.

Reviewed: /s/ Anne Jones
Chief Human Resources, Administration,
and Safety Officer

Approved: /s/ Nicole A. Kivisto
President
and Chief Executive Officer

POLICY STATEMENTS
Policy No. 105.8
Harassment

Effective Date:
October 1, 2025

Addendum A:
Oregon Workplace Fairness Act

I. ELIGIBILITY

- A. This addendum applies to all employees of the Company and its subsidiaries in the state of Oregon. The terms of Policy CORP 105 will continue to apply to employees affected by this addendum, but when there is a conflict, this addendum will supersede CORP 105.

II. REPORTING PROCEDURE

Employees aware of or experiencing discrimination, harassment, or sexual assault in the workplace should follow the reporting procedures as outlined in the Remedies section of CORP 105. Employees are also encouraged to document any incidents involving discrimination, harassment, or sexual assault as soon as possible.

III. NONDISCLOSURE OR NONDISPARAGEMENT AGREEMENTS

- A. The Company will not require an employee to enter into any agreement if the purpose or effect of the agreement prevents the employee from disclosing or discussing conduct constituting discrimination, harassment, or sexual assault.
- B. An employee claiming to be aggrieved by discrimination, harassment, or sexual assault may, however, voluntarily request to enter into a settlement, separation, or severance agreement which contains a nondisclosure, nondisparagement, or no-rehire provision and will have at least seven days to revoke any such agreement.
- C. Under this policy, a nondisclosure agreement is any agreement by which one or more parties agree not to discuss or disclose information regarding any complaint of work-related harassment, discrimination, or sexual assault.
- D. A nondisparagement agreement is any agreement by which one or more parties agree not to discredit or make negative or disparaging written or oral statements about any other party or the company.
- E. A no-rehire provision is an agreement that prohibits an employee from seeking reemployment with the company and allows a company to not rehire that individual in the future.

IV. TIME LIMITATIONS

Nothing in this policy precludes any person from filing a formal grievance in accordance with a collective bargaining agreement (if applicable), the Bureau of Labor and Industries' Civil Rights Division, or the Equal Employment Opportunity Commission. Note that Oregon state law requires that any legal action taken on alleged discriminatory conduct (specifically that prohibited by ORS 659A.030, 659A.082 or 659A.112) commence no later than five years after the occurrence of the violation. Other applicable laws may have a shorter time limitation on filing.