NORTHWEST NATURAL HOLDING COMPANY
VIOLATION REPORTING POLICY
(WHISTLEBLOWER PROCEDURES)

Revised July 21, 2026

1. It is the policy of Northwest Natural Holding Company (NW Holdings) and its subsidiaries (collectively, Company) to provide employees and outside parties with a means to anonymously and confidentially report potential violations of the Company's Code of Ethics, Company policies, or law. The Company maintains the following options for confidential and anonymous reporting:

   - Integrity Hotline (1-866-546-3696)
   - Website: www.nwnintegrity.com
   - Mail: Chief Compliance Officer at Northwest Natural Holding Company, 250 SW Taylor Street, Portland, Oregon 97204

   The Integrity Hotline and www.nwnintegrity.com are currently administered by NAVEX EthicsPoint, an independent, third-party vendor. Company employees, officers, directors, shareholders and others may contact EthicsPoint 24 hours a day, 7 days a week through the Integrity Hotline or website. Reports made by calling the Integrity Hotline are taken by trained EthicsPoint personnel, who observe industry standard protocols for ensuring confidentiality and anonymity.

2. In addition to the confidential and anonymous reporting process described above, reports of alleged violations may be directed to supervisors, managers or other personnel within the Company, as described in the Code of Ethics ("Other Reporting Channels"). All reports received through Other Reporting Channels alleging violations of (1) accounting, internal controls over financial reporting or auditing matters, and allegations of conduct that could materially impact the financial statements of the Company (Specified Financial Reports), (2) violations of law by any employee of the Company, or (3) certain violations of the Code of Ethics, including any conduct that may result in reputational risk for the Company, in each case, as determined in accordance with guidelines established by the Chief Compliance Officer ("Business Integrity Reports") will be handled in a manner consistent with this policy and are required to be reported to the Chief Compliance Officer, the Integrity Hotline or at www.nwnintegrity.com to ensure that they are appropriately tracked and monitored as Business Integrity Reports.

3. The information provided in each Business Integrity Report will be reviewed, investigated and managed in accordance with procedures developed by the Chief Compliance Officer. Under these procedures, the Chief Compliance Officer, will:

   a) Promptly conduct or oversee any necessary investigation of a Business Integrity Report with the assistance of the Company's Internal Audit, Human Resources, Legal Department or other internal and external resources as they deem appropriate under the circumstances;

   b) If the investigation results in a determination that there has been a violation of the Code of Ethics, Company policy or law, provide information to the executive officer who oversees Human Resources (or such officer's designee) and to other Company personnel as appropriate to help establish appropriate corrective actions;

c) Oversee the maintenance of a record of the receipt, internal review and resolution of each Business Integrity Report, including the retention of any documentation received or created in connection with any Business Integrity Report in accordance with all applicable laws and any related Company records retention policy; and

d) Provide periodic reports concerning Business Integrity Reports to the Audit Committee (at a minimum at each meeting of the Audit Committee at which NW Holdings' and Northwest Natural Gas Company's annual financial statements are reviewed).

4. All Business Integrity Reports will be handled with discretion and confidentiality and, if possible, the anonymity of any person making a Business Integrity Report will be protected to the fullest extent practicable within the requirements of the law and the legitimate needs of any ensuing investigation. To thoroughly investigate and resolve a Business Integrity Report, there may be a need to inform selected individuals about the specifics of the allegations, and there may be times when the Company has a legal obligation to disclose information to regulators or other third parties.

5. The Company prohibits retaliation against anyone for good faith reports of possible violations of the Code of Ethics, Company policy or law or who participates in an investigation in good faith. Good faith reports are those made with a reasonable belief in the truth of the report. This applies regardless of whether the report is determined to be substantiated or unsubstantiated following an investigation. Alleged retaliation is required to be reported as a possible violation of NW Holdings' Code of Ethics and reviewed, investigated and managed under this policy. Any employee that engages in retaliation is subject to disciplinary action, up to and including termination.

6. For reports determined by the Chief Compliance Officer to be Specified Financial Reports, the Chief Compliance Officer will immediately notify the Director of Internal Audit and the Chair of the NW Holdings Audit Committee. Officers with responsibilities involving financial controls and reporting will receive notification of Specified Financial Reports once it is determined there is no conflict in providing such information as determined by the Chief Compliance Officer or the Chief Compliance Officer's designee.

7. This Policy was approved by the Audit Committee of the Board of Directors. The Audit Committee oversees the implementation of this policy at the Board level, and management oversight of this policy rests with our Business Integrity Team, led by our Chief Compliance Officer. Management is responsible for communicating the terms of this policy to employees, including the various channels for reporting possible violations and prohibition of retaliation.