

NORTHWEST NATURAL HOLDING COMPANY
VIOLATION REPORTING POLICY
(WHISTLEBLOWER PROCEDURES)

Revised October 1, 2018

1. It is the policy of Northwest Natural Holding Company (NW Holdings or the 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. NW Holdings maintains the following options for confidential and anonymous reporting:

- Integrity Hotline (1-866-546-3696)
- Website: WWW.NWNINTEGRITY.COM
- Mail: Director of Internal Audit or Chief Compliance Officer at Northwest Natural Holding Company, 220 NW Second Avenue, Portland, Oregon 97209

The Integrity Hotline and WWW.NWNINTEGRITY.COM are currently administered by 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. Reports placed at WWW.NWNINTEGRITY.COM are protected by encryption technology and screen names and computer addresses are not captured or tracked by the vendor.

2. The Chief Compliance Officer will advise the Audit Committee of any changes to the confidential reporting process described above. The Chief Compliance Officer will report to the Audit Committee at least annually on the effectiveness of the confidential reporting process and any suggested or required improvements or enhancements to that process.
3. 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 the Code of Ethics or law ("Business Integrity Reports") will be handled in a manner consistent with this policy and are required to be reported to the Director of Internal Audit, 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.
4. The information provided in each Business Integrity Report will be reviewed, investigated and managed in accordance with procedures developed by the Chief Compliance Officer and the Director of Internal Audit. Under these procedures, the Director of Internal Audit and 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, make recommendations to the most senior employee that oversees Human Resources (or such officer's designee) and to other Company personnel as appropriate regarding corrective action;
- 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 the Company's annual financial statements are reviewed).

The Chief Compliance Officer and the Director of Internal Audit will periodically review these procedures with the General Counsel and will consult with the General Counsel or other legal counsel designated by the General Counsel as internal compliance counsel ("Compliance Counsel") and will consult with Compliance Counsel as appropriate to ensure appropriate safeguards regarding attorney-client privilege and other legal issues.

- 5. 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.
- 6. The Company prohibits retaliation against anyone for good faith reports of possible violations of the Code of Ethics, Company policy or law. Alleged retaliation is required to be reported as a possible violation of the Company's Code of Ethics and reviewed, investigated and managed under this policy.
- 7. For reports determined by the Director of Internal Audit or the Chief Compliance Officer to contain credible allegations of misconduct concerning accounting, internal accounting controls or auditing matters, other allegations presenting a risk of significant legal, financial or reputational exposure to the Company, or violations of the Company's Code of Ethics or law by any officer of the Company, the Chief Compliance Officer and the Director of Internal Audit, in consultation with the General Counsel or Compliance Counsel, will immediately notify the Chairman of the NW Holdings Audit Committee and will also immediately notify the CEO, CFO or other appropriate members of the senior executive team who have a reason to be informed of the allegations.