INTEGRITY

We cultivate a work environment that requires honesty and the highest ethical standards.

Living our values

Code of Business Conduct
Dear Fellow Employees:

Integrity is one of ALLETE’s core values. In this BOUNDLESS era, our values are depicted in a swirl, without rank order. Yet in many ways, integrity serves as the foundation, reinforcing and motivating our behavior with respect to all the other core values.

ALLETE’s Code of Business Conduct is titled *Living Our Values* because that is precisely what we are called on to do. We “live” integrity when we cultivate a culture that requires honesty and the highest ethical standards.

ALLETE has built its strong reputation over more than 100 years. We are a respected business, a trusted neighbor in the communities where we serve and operate. Nothing is more important to our future success than our integrity. We must always act responsibly, honestly and ethically. We cannot compromise our integrity regardless of the pressures we face, regardless of who is (or isn’t) watching. This is equally true whether we are interacting with fellow employees in the workplace, meeting with customers, travelling for business, selecting a contractor, or answering an email.

This handbook contains essential information about who we are and how we conduct business. Each of us shares responsibility for maintaining ALLETE’s integrity. Let these important policies guide your everyday decisions and help you deal with challenging situations. Follow the letter and, equally important, the spirit.

None of us can or should go it alone. Cultivate relationships. Talk to each other; discuss concerns and work together to find solutions to challenges. Speak up. Always ask for guidance when the right thing to do is not clear.

Thank you for joining me in our unwavering commitment to integrity and to living our values.

Alan R. Hodnik  
Chairman, President and Chief Executive Officer
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Integrity: We Must Each Do Our Part

This code applies to all employees, officers and directors of ALLETE and its subsidiaries and business divisions. It also applies to representatives, agents and contractors doing business on the company’s behalf. Each of us is responsible for upholding the company’s integrity.

Disciplinary action—up to and including termination—could result from violating this Code of Business Conduct.

Take Responsibility

Personal accountability is an essential part of integrity. We need to keep our commitments and “walk the walk.” We may have different job responsibilities, but there are some universal standards we all must follow to help ALLETE maintain the highest ethical standards.

All employees must:

Follow the rules. This includes following any laws that apply to us and abiding by company policies.

Admit when we make mistakes. Errors are a natural part of being human. We must never try to cover up or conceal our mistakes. Instead, speak up and take steps to resolve them.

Embrace opportunities to learn and grow. Our experiences—especially those involving failure—have the power to transform us and others around us.

Talk about integrity. At a minimum, each of us must annually review this Code of Business Conduct as part of participating in a formal discussion about integrity at ALLETE. Ideally, we will discuss these topics on a regular, recurring basis.

Speak up. It is our obligation to say something when we feel unsure or uncomfortable, especially if an action or situation seems to contradict ALLETE’s core values. Promptly report concerns or known misconduct. Speaking up also includes fully and honestly cooperating with any compliance review, audit or investigation.

Do the right thing, no matter what. Do what is right even when it isn’t the easy choice. Do the right thing even when you think that nobody is watching.
All company leaders have these additional, special responsibilities:

*Be a strong role model.* Leaders play a key role in establishing company culture; they are ambassadors of ALLETE’s values. It means little to talk about integrity if we do not embody it ourselves. Leaders should incorporate integrity and values discussions into the workplace, demonstrate values-based decision making, and recognize and reward others for doing the same.

*Be a resource for other employees.* Leaders should be responsive to employees’ needs, whether it is answering questions and addressing concerns or providing resources and training opportunities. We must also know when to escalate issues we are not sure how to address.

*Be responsive.* Leaders need to give due attention to all integrity matters. We should show appreciation for employee engagement, seek guidance ourselves and investigate all reports in a timely, appropriate manner.

*Create an environment in which employees feel comfortable speaking up without fear of punishment.* Leaders are key to creating an open environment. Employees need to know that they will not be punished for coming forward, even if an integrity concern is proven unfounded. Cultivate a workplace culture where high expectations are balanced with understanding and compassion. Foster a safe environment to acknowledge that we sometimes make mistakes or don’t know what to do.
Face Ethical Dilemmas; Choose Integrity

Sometimes the right choice is clear and easy to make. Other times, difficult or complex circumstances can make it hard to discern what is the right thing to do—and even harder to do it. Competing priorities can lure us toward behavior that conflicts with our values. Before we act at such times, it is essential to stop and reconsider our choices.

When facing an ethical dilemma, ask important questions like these to help you make choices that align with your integrity:

- Is the action legal?
- Would it violate company policy?
- Is this the right thing to do?
- Would I feel guilty?
- Would I want other people to know about it?
- How would it look broadcast on local or national news?

Seek Guidance, Discuss Concerns; Report Misconduct

When in doubt, we need to seek out others for guidance before making a choice we may regret. We owe it to ourselves, the company and each other to ask questions, raise ethical concerns and report misconduct when necessary.

You have options for reporting ethical concerns. The best means to get the advice you need or resolve your concern will usually involve speaking directly, openly and honestly with an appropriate person. When possible, talk to your immediate supervisor or manager first.

If you are uncomfortable discussing an issue with that person, seek assistance from any supervisor or manager or contact your Human Resources leadership. You can bring your issue or concern to any member of the Compliance Management Committee, which oversees ALLETE’s integrity and compliance program. (Compliance Management Committee members are listed on the ALLETE website.)
Whomever you seek out, company leaders are expected to be receptive to your questions and to respond promptly by offering guidance, clarifying requirements, investigating the facts, or escalating the concern as necessary.

If you find it difficult to bring an ethical or compliance concern directly to company leaders, or if you wish to remain anonymous, you can call the ALLETE Integrity Hotline at any time. You can use the hotline to ask questions, voice ethical concerns or report possible violations of this code of conduct, other company policies, rules, regulations or laws. The Hotline is available to ALLETE employees, contractors, or other concerned parties.

**ALLETE Integrity Hotline**  
1-866-776-6951

All ALLETE Integrity Hotline calls are answered by specialists hired and trained by an outside organization. The information then will be handled by appropriate company employees who will review and investigate the report, and respond appropriately. You will receive instructions and a time frame to check back with the hotline for the company’s response to your question or to learn the status of an investigation.

**Investigations**

ALLETE takes reports of potential misconduct seriously. We will investigate the matter, make factual determinations and take appropriate corrective actions. If you are asked to participate in an investigation, you must cooperate fully and answer all questions completely and honestly.

**No Retaliation**

ALLETE values the help of employees who identify potential problems that need to be addressed. No disciplinary action or retaliation will be taken against an employee who, in good faith, brings a concern to the company’s attention, even if the concern later proves to be unfounded.

ALLETE also values employees’ full and open participation in investigations into potential misconduct and prohibits retaliation against employees in connection with such participation.
Anyone who retaliates against another person in violation of this policy will face disciplinary action up to and including termination. If you think you or someone else has been retaliated against or threatened with retaliation, you should promptly report the matter.

Respect Others; Support Diversity

We will treat each other with fairness, dignity and respect. We meet this fundamental obligation by showing standard professionalism, courtesy and consideration to every person we encounter through work, and by respecting diverse peoples, cultures and ideas in the workplace.

We are committed to providing a safe and secure workplace with zero tolerance for harassment, illegal discrimination, or violence. No workplace decision or action should ever be based on a person’s race, color, religion, sex, sexual orientation, national origin, age, disability, veteran’s status or the like. Unacceptable behavior includes the use or circulation of offensive communication such as slurs, other degrading comments, or inappropriate comments or “humor” targeted at an individual.

Workplace violence is prohibited, including physical assault, threat of physical harm or assault, unwelcome advances or physical contact, stalking, theft or vandalism of company or personal property, bullying or intimidation. We restrict the possession of guns or other weapons at company facilities.
Work Safely

Integrity is the foundation of our deep commitment to workplace safety. When we see something that is unsafe, we have a responsibility to say something. We are committed to being injury-free for ourselves, for each other, and for our families and friends. This commitment also extends to the communities in which we work; we use care and caution to avoid injury to anyone. We choose to work safely because we want to, not just because we have to.

ALLETE is committed to living Zero Injury and fostering a healthy and safe work environment. In addition to knowing and following safety rules and regulations, we strive to continuously learn from each other in an environment of mutual trust and respect.

We are committed to providing a work environment free from alcohol and other drug use. Employees must not be impaired due to alcohol or drugs when reporting to work and during all work time. Any unauthorized possession or use of alcohol on company property is prohibited. It is also unacceptable to use alcohol off premises while on company business if it impairs business judgment or risks anyone’s safety. We may not possess or use illegal drugs on company property or while on company business.
Respect the Environment

We are committed to complying with all environmental laws and regulations. Beyond this, as stewards of the environment, we use natural resources responsibly and wisely. We are committed to balancing the environmental impact of our activities with our obligations to key stakeholders including shareholders, customers, the communities we serve and future generations.

Comply with Laws and Regulations

We comply with applicable laws and regulations. Numerous laws apply to the work we do, and requirements are often complex. We are responsible for understanding the laws, regulations and other requirements that pertain to our jobs, and for helping ensure that company operations conform to applicable laws. Failure to comply with applicable laws or regulations could have serious consequences—potentially resulting in corporate liability, personal sanctions or both.

Of course, we are not expected to ensure legal compliance on our own. Laws and regulations can be complex and difficult to interpret. We should discuss legal compliance with co-workers, as appropriate, or our supervisor or manager. Whenever we have doubts or questions about any legal compliance matter, we should contact ALLETE's Legal Services Department.

Conflicts of Interest

A conflict of interest arises when personal interests or activities influence or appear to influence our ability to act in ALLETE's interests. Conflicts of interest include situations when we, our family members or our friends have the potential to receive personal benefits as a result of our work decisions. Opportunities gained from company position, property or information should not be used for personal benefit. Actual or apparent conflicts can arise when we do not act but have the power to act. It is important to conduct ourselves in a manner that avoids even the appearance of conflict between our personal interests and the company’s interests.
Separating Work and Personal Relationships

We must avoid circumstances where our personal relationships influence, or appear to influence, work relationships and responsibilities. We may not have a direct or indirect reporting relationship with a family member. (Any exceptions to policies about family reporting relationships must be approved in writing by your company’s President or ALLETE’s Chief Executive Officer.) Supervisors are strictly prohibited from engaging in romantic or sexual relationships with anyone reporting to them, directly or indirectly. Each of us must refrain from engaging in any romantic or sexual relationship with co-workers, customers, suppliers or other company contractors, representatives or associates if it could create a conflict of interest.

Reporting a Conflict (or Potential Conflict) of Interest

If we have conflict of interest, we must immediately report the details to our supervisor or manager. We should also discuss any potential conflict of interest with our supervisor or manager as soon as possible after we become aware of it. If a resolution to the conflict is not apparent, the supervisor or manager must refer the matter to the Compliance Management Committee or ALLETE’s General Counsel. If we know about an actual or potential conflict of interest involving others, we should also report that. It is best practice to document the resolution of conflicts of interests in writing. It is also best to be clear and forthright, letting others around us know how the conflict or potential conflict has been addressed.

Off-the-Job Conduct

As a general rule, our personal lives are our own. At the same time, the company takes pride in being highly respected in all our communities. What we do and say off the job must not reflect poorly on the company’s reputation or interfere with our job performance. Our off-the-job conduct should not conflict with the company’s values or harm its interests. We must be mindful when we engage in personal activities away from work while wearing apparel branded with a company name or logo. Depending on the circumstances, we could be perceived as representing the company.
Charitable and Community Activities

We are encouraged to participate in community projects and organizations personally and on our own time. Many of us choose to volunteer in the communities where we live and work. Sometimes there may be opportunities to do community service work as part of a company endorsed or supported effort. We need to consult with our supervisor if we are unsure whether we would be serving as a company representative or in an individual capacity when participating in volunteer activities.

Social Media

Social media is a broad term used for a host of online communication sites ranging from social networking (e.g., Facebook, LinkedIn, etc.) to blogs and micro blogs (e.g., Twitter, etc.) to photo and video sharing (Instagram, YouTube, etc.) to online forums, social news sites and message boards. Social media enables easy interactions and knowledge sharing. Connections can occur instantaneously; content can spread very far, very quickly.

Many employees actively engage with social media. It can be a fun and rewarding way to share our lives and opinions with family, friends, co-workers and the larger world. Using social media also presents risks and carries with it certain responsibilities.

Be aware of and follow company policies and procedures around appropriate use of social media.

What follows are some basic guidelines to assist us in making responsible decisions about our use of social media:

- *Use good judgment when blending your personal and professional lives.*
- *Protect company resources and reputation by never sharing confidential or proprietary information.*
- *Never speak on behalf the company—on social media or anywhere else—unless you have been authorized to do so.*
- *Use appropriate channels within the company to raise your concerns and air your opinions.*
Ultimately, we are each responsible for what we post online. Before creating online content, we should consider the risks and rewards involved. Any conduct that adversely affects our job performance or that adversely affects other employees, customers, suppliers or ALLETE’s legitimate business interests could result in disciplinary action up to and including termination.

**Fair Dealing**

We deal fairly with our customers, suppliers and competitors. It is wrong to take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice. Failing to deal fairly with others could damage our reputation and the company’s reputation. It also could be illegal. ALLETE’s reputation is a reflection of how we treat others.

**Business Gifts**

We only give or accept business gifts that are appropriate. A business gift can be anything that is given to or received from a customer, vendor, supplier or other person or entity we know through work. Gifts include: entertainment, events and trips, paid admission to sporting events or concerts, meals, lodging, discounts or other special favors, courtesies or privileges not available to the general public, and the like. We must use sound, reasonable judgment, giving or accepting gifts only if they are primarily business-related, of limited value and consistent with normal business and social practices.

Never solicit a gift. Never give or accept cash or securities. Do not give or accept a gift that could influence or appear to influence business decisions. Never give or accept a gift or courtesy that reasonably could be construed as a bribe or kick-back.

Special restrictions apply when dealing with governments and public officials, both domestic and international. You must seek guidance and fully understand the rules before engaging in a business relationship with any government or government-owned entity. Never give any gifts to any government or any government-owned entity without first getting legal counsel.
### Before accepting a gift, ask yourself:

- *Would I or anyone acting on behalf of the company be influenced by accepting it?*
- *Would others suspect that I or someone else was being influenced by the gift?*
- *Would others think that someone received an unfair advantage?*
- *Is the offering unusually generous?*
- *Could I afford to buy it for myself?*
- *Do I feel uncomfortable accepting the gift?*
- *Would I be uncomfortable if others knew about this gift?*

### Before giving a gift to customers or other business associates, ask yourself:

- *Does it comply with law, regulation or policy?*
- *Is it reasonable and consistent with good judgment?*
- *Is it offered in the ordinary course of doing business?*
- *Has it been properly approved and accurately reflected on company books and records?*

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**Financial Integrity**

We truthfully, accurately and completely record and report all company financial transactions. Company books and records must be complete and accurate to maintain shareholder, regulator and public trust and confidence, and to comply with laws. We must record and report all transactions in compliance with Generally Accepted Accounting Principles and relevant laws and regulations.

Never alter, omit or falsify any transactions, or facilitate any questionable, unauthorized or illegal payment.

The audit process verifies the integrity of company information for company leaders and the public. We must always cooperate fully and honestly with internal and external auditors.
Each of us plays a part in our company’s financial integrity. We each make financial transactions when we report our time, use our company credit card or submit an expense report. The way we record financial transactions and other business information can have financial or regulatory impact. We must follow all applicable procedures and controls and record all transactions completely and accurately. We must take special care to ensure that costs are properly charged to any regulated businesses. Your accounting department can answer any questions about the correct recording of financial transactions.

Securities and Insider Trading

Never buy or sell stock or other securities, either directly or through family members or other persons, while in possession of “material nonpublic information,” also called “inside” information. Any of us could gain access to material nonpublic information, so any of us can be an insider. The prohibition against insider trading applies not only to directors and officers, but to anyone who possesses inside information.

We have insider information if we know facts not available to the general public that, if disclosed, could influence the price of a company’s stock or a reasonable investor’s decision to buy, hold or sell securities. Examples of information that could be considered material include:

- financial and strategic business information;
- financial results prior to public release;
- plans regarding a pending or proposed merger, acquisition or divestiture;
- changes in key management;
- significant litigation; or
- gain or loss of important contracts, customers or suppliers.

Using inside information for our financial or other personal benefit or conveying the information to others would be unethical, illegal and a violation of company policy. This applies to ALLETE stock and can also apply to stock or other securities of another company (such as a customer, supplier, partner, acquisition candidate, etc.). The law provides substantial civil and criminal penalties for those who fail to comply with insider trading prohibitions. If you have any questions about compliance with insider training laws contact ALLETE’s General Counsel before you act.
Competition Laws

Antitrust and other competition laws are designed to promote fair competition among businesses for the benefit of consumers. Activities that restrict free competition or allow a company or group of companies to dominate a market (whether as a seller or buyer) might violate federal or state antitrust laws. In general, competitors may not agree to fix or control prices, boycott specific suppliers or customers, allocate customers or territories with competitors or limit production or sale of products or product lines for anticompetitive purposes. We comply with all competition laws.

When dealing with representatives of competing companies, do not discuss or otherwise share information about prices, bids, cost or profit margins, market share, production, sales volume or the like, except in connection with a bona fide sale to or purchase from that competitor. If a competing company initiates a discussion on these topics, stop the conversation immediately and report it promptly to ALLETE’s General Counsel.

We must not enter into contracts or other arrangements that involve exclusive dealing, special or unique pricing, tie-in sales or other restrictive agreements with suppliers or customers without prior approval from company legal counsel.

Given the complexity of competition laws and the severe penalties for violating them, it is important to contact ALLETE’S General Counsel whenever a question arises.

Utility-Specific Requirements

ALLETE’s utility operations are subject to specific state and federal laws and regulations. The North American Electric Reliability Corporation (NERC) reliability standards set requirements for planning, securing and operating the bulk electric system, and govern activities in a wide variety of functions across the utility. Bulk electric system reliability is critical, and we are all expected to adhere to the requirements of these standards. Employees are instructed to report any potential violations of the NERC standards to the Transmission Regulatory Compliance (TRC) Department to ensure prompt mitigation. You can also report any concerns using the ALLETE Integrity Hotline.
SAFETY  Together we choose to work safely for our families, each other, and the public.
We commit to be injury-free through continuous learning and improvement.

Employee Growth  We support the growth and development of our employees
resources to make a positive difference in the communities where we work and live.

Community Engagement  We engage our communities through creative partnerships and leadership.

Values

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Values
Our Shared Values

Alle and its employees expect and embrace lifelong learning, creativity and diversity of perspectives, personal accountability and continuous improvement in all that we do.

Our culture nourishes excellence through our shared values, which are lived every day.

This Code of Business Conduct reflects Alle’s core values, which go to the heart of how we treat each other and how we conduct business.
Utility operations are also subject to the Federal Energy Regulatory Commission (FERC) Standards of Conduct. These standards restrict the disclosure of sensitive, non-public transmission information to utility marketing contacts. If we have the company’s non-public transmission information, we must not serve as a conduit of that information to internal or external energy marketing contacts that are not authorized to receive the information so as to not impede fair competition. At Minnesota Power, employees designated as marketing contacts are listed as “MP-Marketing” in the company telephone directory. More detailed information pertaining to FERC Standards of Conduct can be found in the “FERC SoC Program Manual” document, accessible through the Transmission Regulatory Compliance web page.

In addition, state and federal requirements prevent ALLETE’s utility operations from subsidizing or otherwise granting an undue preference or advantage to their affiliate companies or non-regulated marketing functions. Minnesota Power maintains books of account and records as prescribed by FERC regulations separately from those of its other affiliates.

We are all required to ensure that our actions comply with these safeguards against threats to the reliability of the bulk electric system, impermissible disclosure of transmission information and affiliate abuse. Questions pertaining to Utility-specific requirements may be directed to Transmission Regulatory Compliance or ALLETE Legal Services.

Relationships with Government and Public Officials

Many laws and regulations govern our contacts with government officials and regulatory agencies. If we are involved in these communications, we must understand and obey the laws governing lobbying activities, gifting and reporting requirements. We must also be familiar with specific rules set by individual agencies or other governmental bodies. It may be improper to have contact with public officials outside of official proceedings about a matter pending for consideration because that contact could improperly influence, or appear to influence, the decision.

We are encouraged to participate in official political processes, complying with all applicable laws as we do so. The company may take specific positions on political or public policy issues affecting customers,
shareholders, employees or other company interests. The company complies with applicable laws for participation in the political process, and makes no illegal contributions directly or indirectly to, or expenditures on behalf of, any candidate for elective office, any political party or any political committee.

As individuals, we are encouraged to personally participate in the political process and are free to make voluntary personal contributions to candidates, parties or political committees. Each of us is responsible for complying with federal and state laws as they may relate to our personal political activities and political contributions.

Protecting Company Assets and Information

ALLETE’s facilities, equipment, materials, information, reputation, and brand have been built or acquired through the hard work of many people using the company’s resources. Company assets and information are intended for business use and purposes only, not for personal gain. We should not use the company name or purchasing power to obtain personal discounts or other advantages that are not broadly available to other employees or the general public. We should not give company property or unpaid services, or loan company equipment, to any person (including another employee) without appropriate authorization.

As with other company property, information systems—including computers, software, email, instant messaging, internet, telephones and mobile phones—are intended for business purposes. Limited personal use of this technology may be permitted by company policies. Whether business or personal, every message we send and every conversation we have using company technology reflects directly on the company. The content must be appropriate. We must not use company information systems in any manner that is connected with offensive, discriminatory, sexually explicit or inappropriate material, or in a manner that could subject us or the company to compromised security and potential legal claims. The company may monitor our use of company information systems; we should not expect privacy.
Theft, waste, misuse or abuse of company assets are serious offenses against our co-workers, shareholders, customers and other stakeholders. You should promptly report any known or suspected incidents of such behavior.

**Protecting Confidential Information**

Inappropriate disclosure of confidential information could be harmful and possibly illegal. We share a responsibility to protect the valuable information entrusted to the company by our leaders, co-workers, customers, shareholders and suppliers. If we have sensitive or confidential information belonging to the company, another person or company, we must understand and honor our responsibility to protect that information. Even after we retire, resign or terminate employment, we still have the responsibility to protect confidential information that we learned through our association with the company.

We must communicate confidential information only on a need-to-know basis and make sure that the recipient understands how the information must be protected. Before sharing confidential information with a non-employee, we must first ensure that the recipient is covered by an appropriate non-disclosure agreement with the company. Be careful not to inadvertently disclose information through casual conversations in public places, email messages, mobile phone conversations or workplace discussions within earshot of others or through inappropriate disposal.

**Managing and Retaining Records**

Each of us is expected to properly manage company documents, both physical and electronic, in accordance with regulatory and legal requirements and company retention policies. Pay especially close attention to how and where you store sensitive or confidential information. Take adequate precautions to protect confidential information that is sent or stored electronically. If you are unsure how to secure confidential information for electronic storage or transmittal, or other record retention requirements, contact your information technology support person.
We must follow the proper procedures to dispose of sensitive or confidential information. Company information and assets that no longer support business operations should be disposed of properly. When we dispose of confidential information, we must be sure to do so in a way that prevents others from later discovering it. Contact your supervisor or information technology support person if you are unsure how to dispose of confidential records.

Policy Waivers

In exceptional circumstances, the company may waive a provision of this code of business conduct. Waivers are neither standard nor taken lightly. All waiver requests must be brought to ALLETE’s Chief Executive Officer. Only the Audit Committee of the ALLETE Board of Directors may approve a waiver for a director or an executive officer and any waiver involving a director or executive officer must be promptly disclosed to shareholders.
Questions and Answers

The following Q&As are designed to help you better understand how we live our integrity value at ALLETE. The facts presented are intentionally designed to yield themselves to right-and-wrong answers. You can also use these Q&As a starting point for discussion. You can change the facts, add information or alter the circumstances to help you think about or engage others in more in-depth discussions about workplace integrity.

Fair Dealing (pg. 10)

Q: A well-respected former employee has started her own consulting business doing the same general work she performed for the company. Is it appropriate for me to contract with her consulting firm without going through the extra work involved in getting bids from other vendors?

A: No. Contracted work must go through competitive bidding processes to ensure the project and work is bid fairly. The former employee may submit a bid for the project through the competitive bidding process.

Financial Integrity (pg. 11)

Q: While travelling out of town for business, I was able to catch up one evening with a personal friend who lives in the city I was visiting. We ate light fare at an inexpensive restaurant and the total bill came to a little less than what I would have spent had I eaten a full dinner myself at my hotel. I paid for the whole bill and would like to submit it all as a company expense unless that would be a concern. Should that be a concern?

A: Yes. It is inappropriate to submit a personal expense to the company as if it were a business expense. You are entitled to charge the company for your actual meal expense while you are travelling on business. Your friend’s meal, however, is not a proper business expense. Personal charges generally should not be paid for using a company credit card; if you mistakenly do so, you should promptly reimburse the company for any personal expenses.
Questions and Answers

Securities and Insider Trading (pg. 12)

Q: I am part of a team that is working on a new company acquisition. We are getting close to finalizing the deal and announcing the purchase. Well before this deal came together, I planned to purchase shares of ALLETE stock for my niece and nephew as a holiday gift. I think the ALLETE stock price will go up on news of the acquisition and I would like to purchase the stock before the announcement. Is it okay for me to purchase the stock?

A: No. You have material, non-public information and must refrain from buying or selling ALLETE stock. Even if you could show that you had planned the precise timing of your purchases before you knew about the acquisition, the fact that you came to possess insider information changes your ability to act on that plan. Wait until after the acquisition is announced to the public before purchasing any ALLETE stock, even as a gift.

Q: I am an administrative assistant. I don’t make high-level executive decisions, but because of my job I have access to ALLETE’s preliminary financial results for the second quarter. It is June 30, and I would like to rebalance my 401(k) investments by moving some of my retirement savings from ALLETE stock into other investments. Can I do this now?

A: No. You have information about financial results that has not yet been released to the public. Even if this knowledge is not driving your decision, you must wait until after the second quarter earnings have been released and the market has reacted before you buy or sell ALLETE stock. This includes transferring into or out of an ALLETE stock fund investment in your 401(k). If you have questions, consult with ALLETE’s General Counsel before engaging in any transaction involving company stock.
Questions and Answers

Comply with Laws and Regulations (pg. 7)

Q: I am eligible for overtime. Sometimes, I forget to record overtime hours that I worked in the prior pay period. When that happens, I will add the same amount of overtime hours to my timesheet for the current pay period. Although I didn’t actually work the hours in the pay period, I did work the hours and should be paid for them. Is this way of truing up my time okay?

A: No. While you are, of course, entitled to be compensated for all your time spent working, it is also important that you accurately record your hours worked. Timesheets are company records. You must not falsify your time sheet for any reason. If your time was submitted incorrectly, contact your supervisor as soon as possible and follow appropriate procedures for correcting the time entry records.

Q: I am an hourly employee who gets paid overtime if I work beyond my set schedule. I have learned that I am more productive during my regular work hours if I respond to work e-mails from home on my time off. I don’t mind spending a few minutes most nights doing this and I never record the time or expect to be paid for it. Is this a problem?

A: Yes. Reading and responding to work-related communications is a routine part of your job. You are entitled to compensation for your work and the company is required to pay you for all time you work. You should do this work during regular work hours unless you and your supervisor have agreed to a different schedule. A supervisor or manager must approve overtime hours. In any case, you must accurately record and be paid for any time you spend performing work-related tasks, whether at work or home.
Q: I am responsible for collecting data for a facility and reporting the results to the state every month. While preparing this month’s report, I realized I forgot to collect a minor measurement that I consider to be relatively unimportant; I’m confident my co-workers would agree that the missing measurement is not material to what the state is trying to track and manage. Previous values have had little variability, and I feel sure that this month’s data would be similar. Can I use data from previous reporting periods as the basis for this month’s report without an actual collection?

A: No. It is critical for our environmental data collected to be accurate. We must keep accurate and truthful business records. Inaccurate collection or reporting of environmental data could result in the company being fined, sued and suffering serious damage to its reputation.

Q: Your supervisor asks you to look into his neighbor’s account. The neighbor has been complaining of erratic bills. Your supervisor would like you to look into the issue as a favor to his neighbor. You have access to customer account information, but addressing these types of customer complaints is not part of your job duties. Should you access the customer account as requested?

A: No. We must protect customer information, accessing it and using it only when we have a legitimate business reason to do so. The neighbor’s concerns should be addressed through proper channels by working directly with customer service. (Even forwarding the information to customer service on behalf of the customer would require you to access customer information without a business need.) If your supervisor continues to press the request you should seek assistance and report the issue.
Questions and Answers

Investigations (pg. 4)

Q: The Company is looking into possible misconduct involving one of my co-workers. I have been asked to provide information but I don’t want to get anybody in trouble and I don’t want the reputation of being a “snitch”. I prefer to just stay out of the whole situation. What should I do?

A: Although it is not always easy, we each have a fundamental responsibility to do the right thing and you are expected to fully, openly and honestly cooperate with any investigation. You will be protected from retaliation for your participation in the investigation.

Respect Others; Support Diversity (pg. 5)

Q: I told a sexually suggestive joke at a meeting and everyone laughed, men and women alike. That’s ok right?

A: No. It is inappropriate to make jokes or comments that are derogatory about any race, religion, sex, political affiliation, or the like. Stereotyping—making broad generalizations or assumptions about groups of people—is often rooted in intolerance. Such behavior disrespects people and works against diversity in the workplace. Sometimes people laugh to cover up embarrassment, discomfort or hurt. Do not assume a joke is acceptable because no one objects at the time it is told.
Thinking about Integrity

The ethical dilemmas or values conflicts we face in everyday situations may not appear to have clear answers. Sometimes our perception of a situation can be skewed by or our experiences and rationalizations. The scenarios and discussion topics in the following section are intended to mimic difficult situations you could come across in your work life.

There may be multiple acceptable approaches and responses to these scenarios. The objective is not necessarily to arrive at or define a single correct answer, but rather to learn to recognize potential situations that may test our integrity, identify avenues to help us to speak comfortably and openly about issues, and provide the necessary support and tools to navigate ethical dilemmas.

We can enhance our thinking about and discussion of these scenarios further by challenging our initial reactions. Consider the facts from multiple points of view and consider whether our ideas change. Also, try adding new facts or modifying details to come up with new scenarios to prompt further discussion.
Discussion Topics

Scenario I

While attending a technical conference where software vendors set up booths advertising their consulting services and software, you visited a booth where they were giving away a 42” flat screen television. All you had to do was listen to a short presentation and drop your business card into a box from which the prize winner’s name would be drawn. You won the television. Should you accept the prize? If you do, should you keep it for your personal use?

• What ethical dilemma, if any, do you face?

• Is there specific additional information you might need to know or consider to decide what to do? How would you get that information?

• Are there others with whom you would want or need to discuss the issue before deciding what to do?

• Who might be impacted by your decision?

• What is the best way to handle the situation?

• Would it make a difference to your assessment if the company were in ongoing negotiations with the vendor?
Scenario II

You and your coworker have worked together for twenty years out in the field. You are as close as two brothers. You know each other’s families and you often hang out together after work. You each are known for technical expertise and the ability to get difficult projects done—each of you has earned a reputation as a master of your trade.

At the end of an extra-long and challenging shift, your coworker mentions to you that he had a close call while performing maintenance. He admits there was a deviation from an important safety protocol, and mentions it may not be the first time it has happened. When he sees the alarm in your eyes, however, he quickly backtracks, saying the event was no big deal and he could have his facts wrong.

• What should you do?

• Does your close friendship with your coworker impact how you would respond?

• Which of ALLETE’s Shared Values might influence your decision making if you found yourself in the same situation?
Discussion Topics

Scenario III

You have volunteered as part of a larger group of company employees helping with a public service project. You (like all the others in the group) are wearing a t-shirt, baseball hat, and jacket emblazoned with the company logo. There is a big party at the end of the event. A coworker who has been drinking alcohol at the party for hours is now behaving in a very loud, obnoxious manner.

• What should you do?

• Does it matter whether or not you are being paid for your volunteer time?

• Would you feel differently about the situation if you were not all at a “company-endorsed” gathering?

• What would you do if you were out in public after hours and you saw a coworker (wearing a company shirt after hours) behaving in a similarly intoxicated manner?
Scenario IV

You saw a co-worker loading a company truck at the end of a job. You notice that there are some tools and materials left on the ground. When you came back a short while later, the tools and materials are neither in the truck nor on the worksite. The co-worker who had been loading the truck was preparing to leave in his personal vehicle. Something seemed not right.

• What would you do?

• Are there others with whom you would want or need to discuss the issue?

• Are there violations that should be reported?

• What additional information do you need to address the situation and how would you access that information?