

Political Contributions and Lobbying Policy

This policy addresses contributions and expenditures by ALLETE, Inc. (“ALLETE” or the “Company”) as well as lobbying activity. The ALLETE Board of Directors has adopted this policy, which is designed to ensure that political contributions and lobbying are done in a manner consistent with the Company's values, and that the Company’s political and lobbying activities comply with all applicable laws.

This policy applies to all employees of ALLETE and its subsidiaries

Political Contributions

ALLETE’s policy is to comply with all laws and regulations regarding the use of company resources in connection with federal, state, and local elections.

ALLETE believes interaction with policymakers is important to our business. Employees have the opportunity to join together in political action committees (PACs) on the state level, and to have those voluntary contributions donated, through the votes of their respective PAC boards of directors, to state candidates and office holders, in accordance with their respective bylaws. The State PACs are required to publicly disclose receipts and contributions to the applicable reporting entities. Participation in political activities must be the independent, voluntary decision of each employee.

In addition, ALLETE may provide financial support to political organizations by making corporate contributions where it is legally permissible to do so, and only if designed to promote the interests of the Company, and its shareholders, without regard for the private political preferences of any Company employee.

After careful consideration of specific applicable laws that may impact such decisions, ALLETE may make such contributions, provided it is legal to do so, with the prior approval of the Chief Executive Officer, Chief Legal Officer, and Chief Financial Officer to either of the following:

- Ballot measures/initiative campaigns that impact the Company’s business
- Organizations registered under the Section 527 of the Internal Revenue Code

All approvals under this section shall be archived by the Chief Legal Officer for compliance purposes.

All contributions are publicly disclosed as required by applicable federal and state laws.

Legislative Lobbying

ALLETE believes that public policy engagement is an important part of responsible corporate citizenship. As part of the involvement in the political process, ALLETE communicates with lawmakers and regulators about the interests of ALLETE and its customers, communities, employees and shareholders, when it is legally permissible to do so. ALLETE often relies on professionals, both inside and outside of the Company, who bring public policy and subject matter expertise to advocate in the legislative process on our behalf as needed. The ALLETE Manager of Government Affairs is responsible for coordinating the Company's legislative lobbying activities with the prior approval of senior management. ALLETE's Code of Business Conduct requires that our employees, Directors and those acting on our behalf understand and obey laws governing lobbying activities, gifting, and reporting requirements. ALLETE will make reasonable efforts to obtain from its trade associations the amount of annual dues or payments that are not deductible under section 162(e) of the Internal Revenue because they related to lobbying or political expenditures.

Board Oversight

The Board of Directors of ALLETE plays an important role in providing oversight of ALLETE's public policy engagement and participation in the political process for significant policy issues that could impact the reputation of ALLETE's businesses. On an annual basis, the Corporate Governance and Nominating Committee of the Board will review the Company's Policy, and recommend to the full Board any revisions to the Policy as it deems necessary.

Consequences of Noncompliance

Any employee who violates any provision of this policy, may be subject to discipline, up to and including termination of employment.