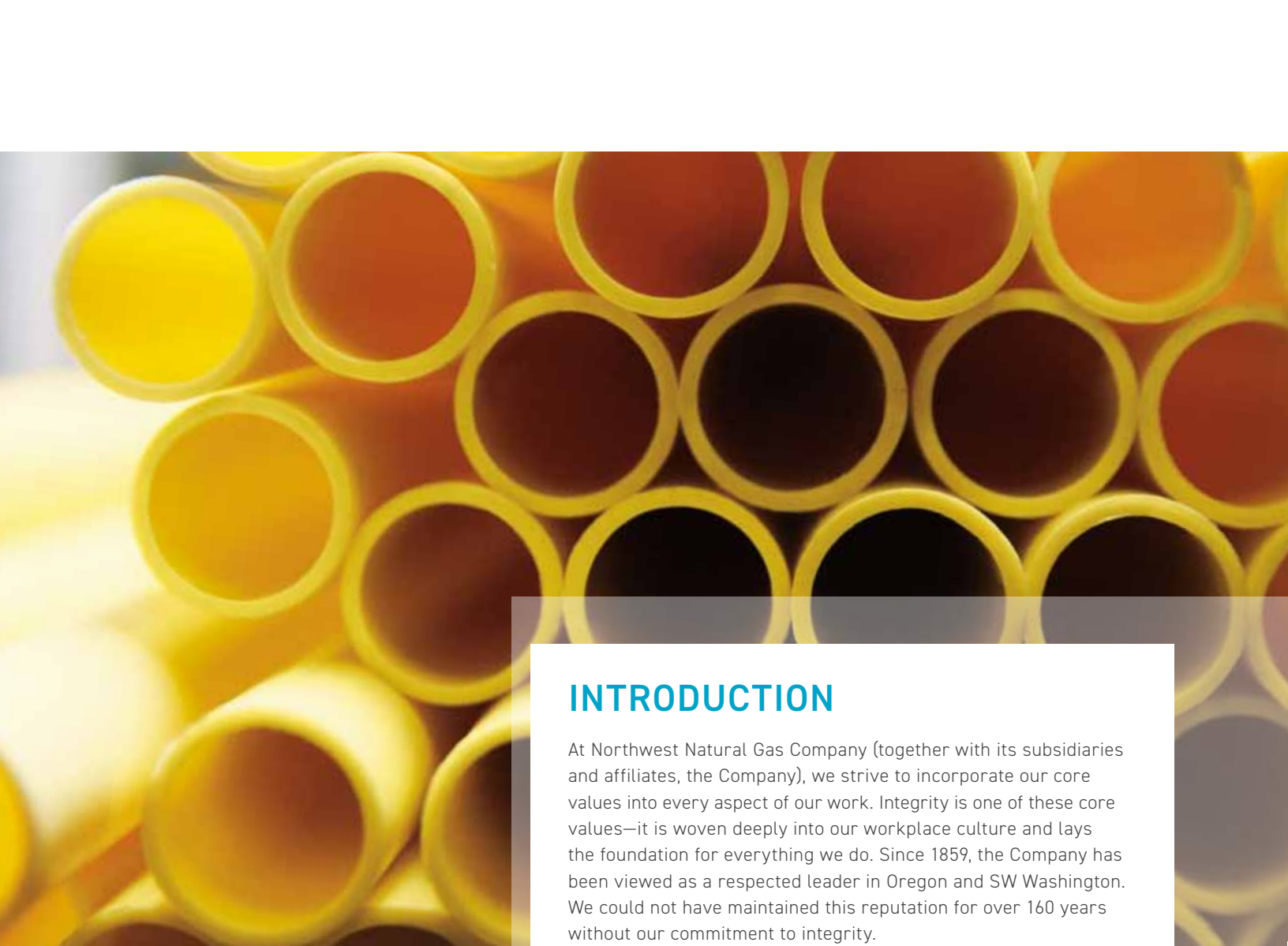


NORTHWEST NATURAL GAS COMPANY Supplier Code of Ethics





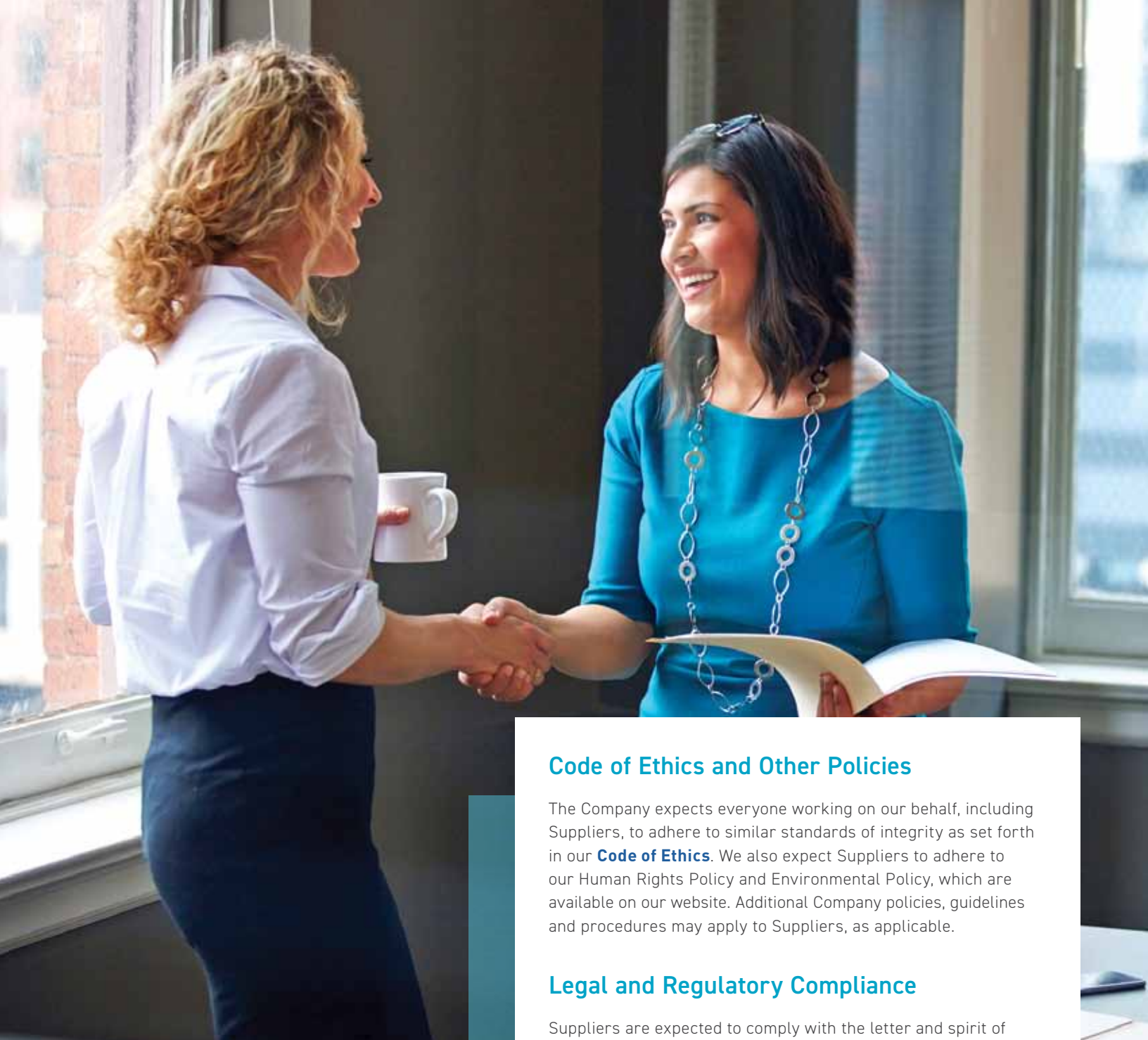
INTRODUCTION

At Northwest Natural Gas Company (together with its subsidiaries and affiliates, the Company), we strive to incorporate our core values into every aspect of our work. Integrity is one of these core values—it is woven deeply into our workplace culture and lays the foundation for everything we do. Since 1859, the Company has been viewed as a respected leader in Oregon and SW Washington. We could not have maintained this reputation for over 160 years without our commitment to integrity.

In furtherance of this commitment, we look for business partners that aim to exceed the minimum legal requirements and embrace sound environmental, social and governance principles. We expect our contractors, agents, consultants, suppliers, subcontractors, vendors and any other person or entity that provides goods or services to the Company (each a Supplier) to adhere to the fundamental values that we establish for our own operations.

Together, our Code of Ethics and this Northwest Natural Gas Company Supplier Code of Ethics (Code) sets forth our expectations for doing business with the Company in a manner consistent with our core values of integrity, safety, caring, service ethic and environmental stewardship. The Company expects all of its Suppliers to carefully review and comply with both the letter and the spirit of this Code. Suppliers are expected to educate and supervise their employees, subcontractors and agents to ensure they understand and comply with this Code.

We are grateful for our partnerships with our Suppliers and thank each of our Suppliers for their commitment to upholding our core values and this Code.



Code of Ethics and Other Policies

The Company expects everyone working on our behalf, including Suppliers, to adhere to similar standards of integrity as set forth in our **Code of Ethics**. We also expect Suppliers to adhere to our Human Rights Policy and Environmental Policy, which are available on our website. Additional Company policies, guidelines and procedures may apply to Suppliers, as applicable.

Legal and Regulatory Compliance

Suppliers are expected to comply with the letter and spirit of applicable statutes and regulatory requirements, including without limitation, laws and regulations related to trade controls, anti-corruption (including the U.S. Foreign Corrupt Practices Act), antitrust, affirmative action in employment, equal employment opportunities, non-discrimination, anti-harassment, wage and hour, environmental consciousness and sustainability, health, safety and security, taxes, corporate governance, insider trading, general business, privacy, protection of personal identifying information, identity theft protection, transportation, pipeline safety, drug, alcohol and controlled substance testing, or any other required background checks or safeguards. Suppliers are responsible for immediately reporting any violations or suspected violations of any laws or regulations as described in this Code.



Anti-Bribery & Corruption

The Company does not tolerate bribery or corruption in any form. Suppliers must not directly or indirectly, offer, give, pay, promise to pay, or authorize the payment of any bribes, kickbacks, influence payments, or other unlawful or improper inducements, in whatever form, to any public official, commercial counterparty, or other recipient for the purpose of retaining business or securing an improper advantage. Suppliers are expected to have adequate processes and procedures aimed at preventing bribery and corruption and to protect employees that report concerns in good faith.

Insider Trading

In the course of doing business with the Company, Suppliers may come across material information about the Company or another company that we do business with. Material information is any information that a reasonable investor, given the total mix of information available, would consider important in a decision to buy, hold, or sell stock—in short, any information that could reasonably affect the price of the stock.

Suppliers and their employees, agents and subcontractors are expected to comply with the Company's Inside Information and Trading Policy, which prohibits, among other things:

- Disclosing nonpublic material information, except to persons within the Company whose positions require them to know it, until such information has been publicly released by the Company;
- Trading in Northwest Natural Holding Company stock or another company's securities when in possession of nonpublic material information; and
- Providing other people with material non-public information, intentionally or inadvertently, or recommending that they buy or sell the securities based upon that information.

Information is considered nonpublic if it has not been circulated in a news release, public filing or other public disclosure and a sufficient amount of time has not passed for it to be absorbed by the financial markets.

Conflicts of Interest

Conflicts of interest arise when a Supplier's interests or activities influence (or appear to influence) their ability to act in the Company's best interest when working on the Company's behalf. Real or perceived conflicts of interest could result in harm to the Company's or a Supplier's reputation. Suppliers and others working on behalf of the Company are expected to act fairly and in the best interest of the Company and to use objective and unbiased standards when making decisions that affect the Company. The Company expects all Suppliers to avoid conflicts of interest and to promptly report to the Company any actual or potential conflict of interest of which they become aware.



Gifts and Entertainment

The Company maintains a Gift and Entertainment Policy in an effort to ensure that gifts or entertainment do not influence business decisions or the selection of our Suppliers. Each Company employee and representative is required to abide by these standards, which generally provide that employees and Company representatives may not give or accept gifts, favors or entertainment that might create or appear to create improper influence or conflict of interest. Suppliers are expected to understand these policies and refrain from offering anything of value that might create or appear to create an improper influence or conflict of interest. Suppliers may offer modest gifts or entertainment that are in accordance with law and Company policies, but such gifts are never a requirement or expectation to doing business with the Company.

Company Records and Financial Integrity

Shareholders, regulators, business partners and other third parties depend on the truthfulness of our financial and business records, regulatory filings and public disclosures. As a result, all business records prepared by Suppliers, including expense reports, bills, time sheets, contract documentation and other records related to our business must be completed with care and honesty. Suppliers may not make false claims, mislead or omit important information. Books, records, accounts and financial statements should be maintained in reasonable detail and appropriately reflect all transactions with the Company and conform to generally accepted accounting principles and legal requirements. Suppliers should maintain adequate internal controls to comply with these policies and procedures.

Fair Business Dealings

We expect suppliers to compete based on the quality of their products or service. Suppliers working on our behalf should interact with others in a fair and honest manner and not disparage or make untrue statements or engage in other unfair business practices. Suppliers are expected to treat Company employees, members of the public and others with dignity and respect.

Company Assets

The Company's assets belong to its customers, shareholders and in some cases, bondholders. These assets may include buildings, vehicles, tools, construction equipment, office equipment and supplies. They also include electronic resources like cell phones, computers, tablets and networks. Suppliers must exercise good judgment and use Company assets responsibly, in furtherance of Company business and in compliance with all contractual terms,

Company policy, law and regulations. Suppliers should take care to protect the Company's assets from loss, damage, theft, misuse or waste and may not dispose of Company assets without proper authorization. Suppliers are expected to report instances of damaged, lost or stolen Company assets.

Intellectual Property

Intellectual property may include patents, trademarks, logos, published information, software, ideas, trade secrets, confidential information and creative content, such as text, music, images, designs and videos. The Company's policies prohibit the infringement of intellectual property rights of the Company or others, and Suppliers may not use the Company's intellectual property or the intellectual property of others for Company purposes without appropriate licenses or permissions.

Confidential and Proprietary Information

Each Company Supplier is expected to protect Company confidential or proprietary information from any unauthorized use or disclosure and to use such information only for an appropriate business purpose. Confidential or proprietary information includes all information that is not generally known to the public, and may include trade secrets, business plans, contracts, documents, financial information, customer information, and other confidential information of the Company and/or its business partners including information related to operations and management or any technical or regulatory information. Confidential information should only be disclosed, used, managed and disposed in compliance with the Company's policies, as well as applicable laws, rules and regulations and any contract between the Supplier and the Company. Suppliers must report to the Company any unauthorized use or disclosure of Company information.





Information Security, Privacy and Data Protection

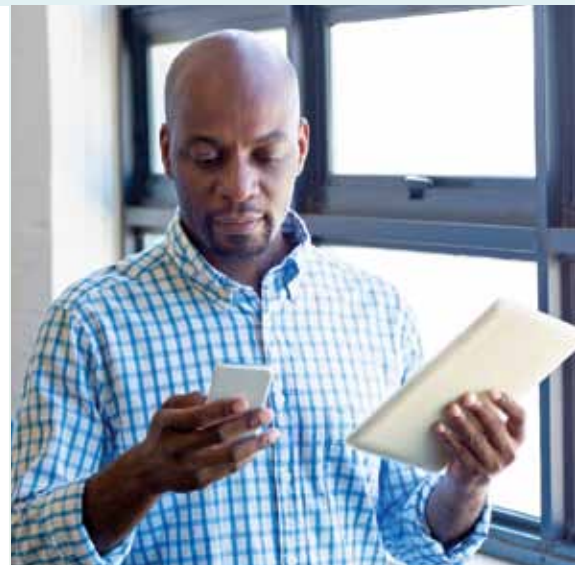
It is expected that Suppliers implement and maintain physical, cybersecurity and administrative safeguards to ensure the confidentiality, integrity and availability of Company information. Suppliers are expected to comply with all applicable Company information security policies and procedures and maintain systems free of malware or other virus that could damage the Company's computer systems. Suppliers should promptly report to the Company any known or suspected security breaches or other incidents that may impact Company information or system operations.

Suppliers are also expected to comply with all applicable privacy and data protection laws when operating on the Company's behalf. Suppliers must safeguard personal data about the Company's employees, customers, business partners or others, and refrain from using or disclosing such information except in accordance with any contract between the Supplier and the Company, the Company's policies and applicable law. Suppliers are to access only those Company files, programs or systems, including operational technology and other technology systems, which they have been authorized by the Company to utilize in connection with the work being conducted for the Company.

Communication, Endorsements and Publicity

Except with the Company's prior written authorization, Suppliers may not make public announcements regarding such Supplier's association with the Company; use the Company's name or any other trademark, service mark, logo or copyright-protected work (whether or not registered) of the Company, in any of Supplier's promotional materials, marketing activities or elsewhere; or identify the Company on Supplier's customer list or website. General marketing or promotional solicitation or communication (flyers, promotional material, etc.) on any Company premises is not permitted without prior approval.

We also expect our Suppliers to be respectful and responsible in public communications, including on social media, and refrain from making comments or statements that are intended to harass or discriminate or are otherwise inconsistent with our core values.





Health and Safety

The Company is committed to the health and safety of its employees, customers, business partners and communities. Suppliers are expected to make our core value of safety a mutual priority and:

- Support a safe and healthy working environment;
- Adhere to all applicable safety laws, regulations, rules, standards and Company policies and procedures applicable to such Supplier's work;
- Follow all site-specific safety requirements or protocols, including related to the use of personal protective equipment;
- Participate in safety training as necessary or appropriate; and
- Promptly report and take corrective action in response to any incident, injury, collision, unsafe or unhealthy working conditions.

Security

We are committed to maintaining a work environment free of violence, harassment, intimidation and other unsafe or disruptive conditions. Suppliers are expected to immediately report any violent act or threatening behavior, including the unauthorized possession of any weapon while on Company property. Suppliers are expected to comply with any applicable Company policies related to background checks, security requirements, identification requirements, and access to company facilities.

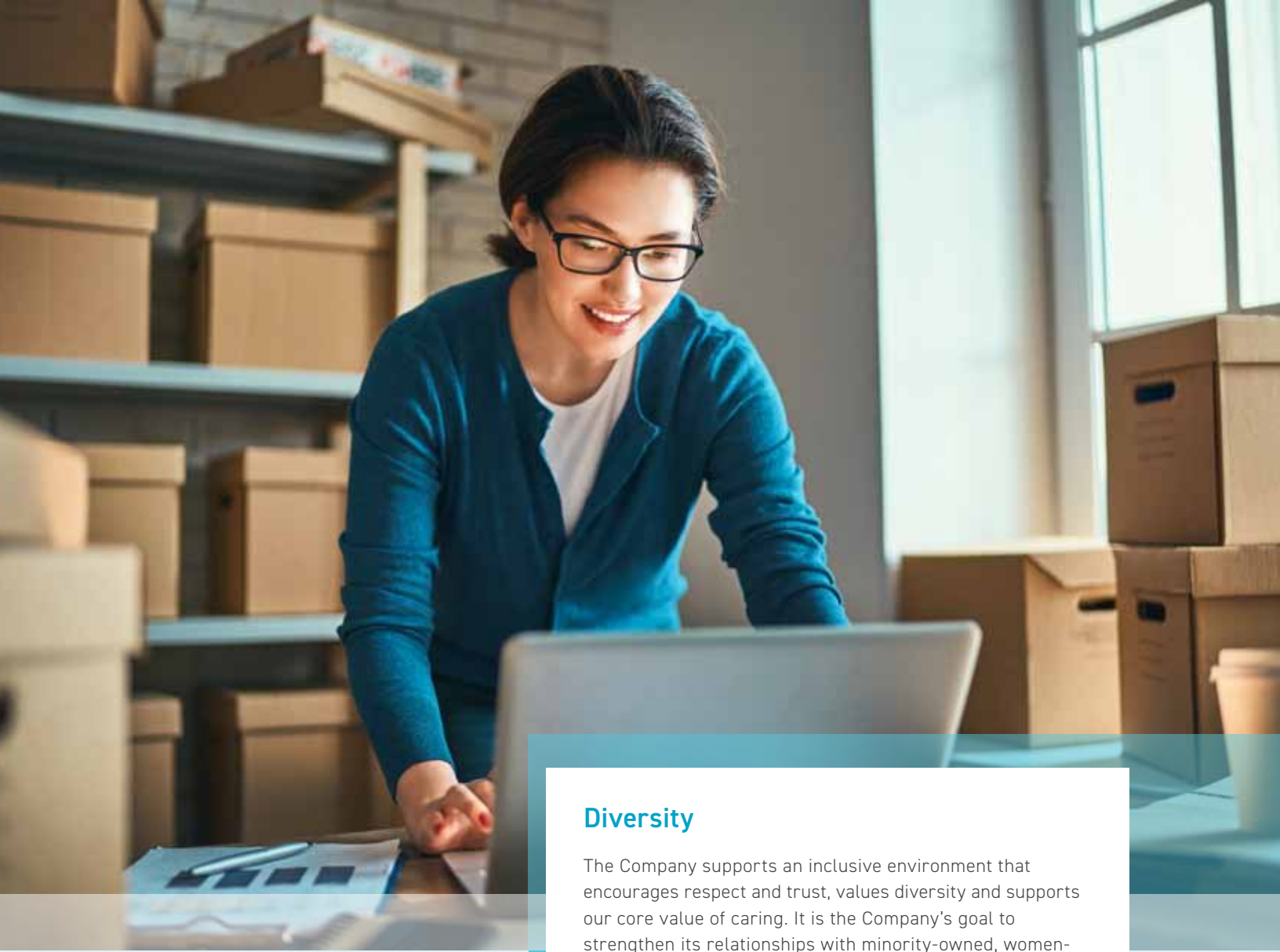
Drugs and Alcohol

Suppliers are expected to be free from the influence of alcohol and illicit drugs while conducting Company business. The use, possession or distribution of alcohol during work hours or on Company premises is prohibited without proper authorization. Suppliers should familiarize themselves with applicable legal requirements (including Department of Transportation regulations, as applicable) and Company policies related to drug and alcohol use and testing, and act in accordance with those requirements and policies.

Labor and Human Rights

The Company expects its Suppliers to comply with all applicable labor and employment laws including, without limitation, those associated with equal employment opportunity, immigration, child labor, forced or compulsory labor, work hours, wages and benefits, employment security, health and safety, freedom of association and a harassment-free work environment. Suppliers are expected to share the Company's commitment to protecting human rights and understand and abide by the letter and spirit of the Northwest Natural Holding Company Human Rights Policy available on our website. Suppliers should understand and strive to mitigate salient human rights risks in their own supply chains.





Diversity

The Company supports an inclusive environment that encourages respect and trust, values diversity and supports our core value of caring. It is the Company's goal to strengthen its relationships with minority-owned, women-owned and other businesses with recognized diversity classifications. We also aim to work with local businesses in order to help support the local communities in our service territories. The Company encourages its Suppliers to similarly strengthen their relationships with diverse business enterprises and utilize diverse suppliers while performing work on the Company's behalf.

Suppliers are expected to support the Company's commitment to non-discrimination. Suppliers must not engage in behavior that unlawfully discriminates, intimidates, harasses or retaliates against individuals on the basis of race, age, color, religion, gender, national origin, disability, marital status, sexual orientation, gender identity, genetic information, or any other status or protected characteristic.



Political Activities and Charitable Giving

Without prior approval in accordance with Company policy, Suppliers may not use Company funds or resources for political activities, make any political contributions or present any gifts on behalf of the Company to any candidate for public office or elected official, or represent the Company or authorize any third party to represent the Company in making contacts with any federal, state or local government official (or member or employee of a legislative body or government agency) to influence policy, legislation, agency rules, regulations or any other official action.

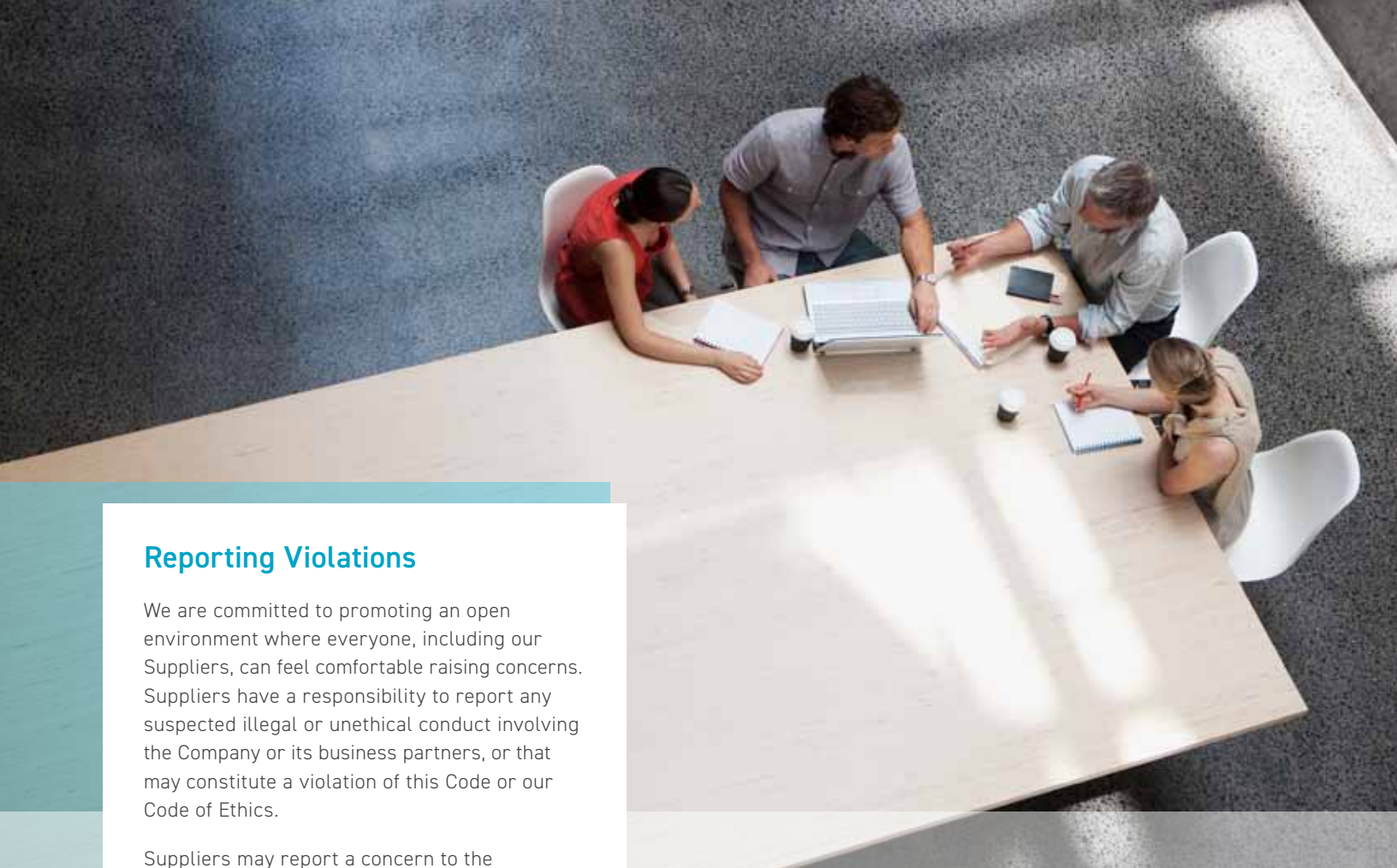
Without prior approval in accordance with Company policy, Suppliers must not make or promise charitable contributions on the Company behalf or take advantage of their relationship with the Company to inappropriately solicit Company employees, suppliers or other business partners for contributions or to become involved in a nonprofit organization.

Environmental Protection and Sustainability

In keeping with our core value of environmental stewardship, we are dedicated to protecting and enhancing the quality of the natural environment. The Company expects Suppliers to support these values and consider the environmental impacts of their work and seek ways to minimize those impacts when performing work on behalf of the Company, including by:

- Complying with all laws, rules and regulations relating to the protection of the environment;
- Conducting operations with the necessary permits, approvals and controls;
- Protecting natural resources;
- Employing proper procedures in the handling, use and storage of chemicals and potentially hazardous materials; and
- Storing, recycling or disposing of any wastes as required by law and at state- or federally-approved facilities and as approved by the Company.

The Company expects its Suppliers to understand and adhere to the Company's Environmental Policy. Suppliers are encouraged to disclose their sustainability results and may be selected, monitored or evaluated on the basis of their environmental disclosures and/or performance.



Reporting Violations

We are committed to promoting an open environment where everyone, including our Suppliers, can feel comfortable raising concerns. Suppliers have a responsibility to report any suspected illegal or unethical conduct involving the Company or its business partners, or that may constitute a violation of this Code or our Code of Ethics.

Suppliers may report a concern to the Integrity Hotline at 866-546-3696 or online at nwnintegrity.com. These resources are administered by a third-party global provider of hotline services. Suppliers may also report concerns to their business contact at the Company, the Procurement Department (PurchasingMailbox@nwnatural.com), the Chief Compliance Officer or Director of Internal Audit at 250 SW Taylor St. Portland, OR 97204 or (503) 226-4211.

The Company is committed to reviewing and addressing concerns promptly, thoroughly and fairly. Suppliers are expected to cooperate in any investigation conducted by the Company regarding any violation of law, company policy or business integrity and take any appropriate corrective action.

Non-Retaliation

Suppliers and their employees, agents and subcontractors may report concerns through any of our channels without fear of retaliation. The Company does not tolerate retaliation against anyone who reports a concern in good faith. Anyone who retaliates against another individual for making a good faith report will be subject to disciplinary action, which may include termination.

Conclusions

This Code is not all-inclusive but is rather intended to serve as an overview of our expectations for our Suppliers and to open communications with our current and potential Suppliers as to potential issues that might arise. Questions regarding this Code should be addressed to such Supplier's business contact, the Procurement Department, or the Company's Chief Compliance Officer.

Failure to comply with this Code, the Code of Ethics or other applicable policies and procedures may result in disciplinary action up to and including termination of such Supplier's relationship with the Company and/or referral to appropriate authorities. The Company reserves the right to conduct periodic audits on Suppliers to confirm compliance with this Code.

The Company reserves and retains the sole and exclusive right to amend this Code from time to time and to interpret and enforce the standards set forth in this Code. Compliance with this Code will not confer any contract or other right or expectancy on the Supplier, nor does it impose obligations on the Company. In case of conflict between this Code and a Supplier's contract, the terms of such Supplier's contract will prevail.