

Position Statement Human Rights

Introduction

Xcel Energy respects the right of all people to be treated ethically, with dignity and without discrimination. We strive every day to demonstrate our commitment to those rights, as well as our core values of Safe, Connected, Committed and Trustworthy, as we conduct business and interact with our employees, customers, communities and other stakeholders.

Commitments

We are committed to the advancement and protection of human rights in all our operations, consistent with all U.S. human rights laws and regulations and the general principles set forth in the International Labour Organization Conventions.

Wages and Living Standards

We believe all workers should be fairly compensated for their work and that wages should comply with local laws regarding minimum wage, wage payment, overtime and work hours. We provide a competitive wage to our employees, relative to industry standards and labor market drivers, and in accordance with the terms of negotiated collective bargaining agreements.

Forced Labor and Child Labor

We are unwavering in our opposition to forced labor and child labor in any country and we comply with national laws, local regulations and international standards designed to prevent such exploitation.

Safe and Healthy Work Conditions

We support individuals' right to safe and healthy working conditions. Safety is more than a priority at Xcel Energy — it is a core value that we live every day. Employees are expected to perform their jobs in a manner that complies with occupational safety and health laws and regulations and to do their part in maintaining safe and healthy working conditions. Employees at every level are given the authority to speak up and stop work in any situation they believe is unsafe, be it within or outside of their work group.

We support our employees' and their family members' personal health and well-being, including their physical, financial and emotional well-being, and we offer benefits and services that support this.

Right to Union Representation

Xcel Energy recognizes the right of employees to select union representation in accordance with applicable laws. Many of the Company's employees have done so and the Company has a long history of productive collaboration and collective bargaining with various unions. The Company complies with all applicable labor laws, including the National Labor Relations Act.



Freedom of Association

Xcel Energy supports a right to freedom of association for individuals outside the workplace. However, it is possible that an employee's association with another person, group or organization could create a conflict in connection with their employment or work with Xcel Energy.

Anti-Discrimination, Diversity, Human Rights and the International Labour Organization Conventions We stand steadfast against racism, intolerance, discrimination and harassment. We recognize that our continued success depends on the strength and diversity of our employee base, and we provide equal opportunity in hiring, promotion and other terms and conditions of employment, without regard to race, color, religion, creed, national origin, gender, age, disability, veteran status, sexual orientation, gender identity, genetic information or any other protected class status in accordance with applicable federal, state and local laws.

We are members of the communities in which we operate and are committed to working with members of those communities to help promote the principles of equity and respect. At Xcel Energy, we face these challenges openly and honestly to drive positive, meaningful change within our company and beyond. We are one team powered by many.

Starting with the Xcel Energy Board of Directors and extending through all levels of the organization and into the service we provide customers and our work with communities, suppliers and partners, diversity of thought, background, experience and ethnicity are valued. That diversity helps us assess business risks and opportunities from different angles and elevate and nurture the best ideas. Recognizing and celebrating our differences and being inclusive of one another can help to build a stronger organization, a stronger community and a stronger society.

Respect for Customers, Communities and Stakeholders

Xcel Energy seeks to engage with stakeholders and the customers and communities we serve and respects the rights and views of all people. Those who work with Xcel Energy can expect us to act collaboratively and with integrity and to advocate for solutions that balance the needs of our many stakeholders. As a regulated energy provider, we serve all customers equally and play a critical role in sustaining our communities and helping them thrive. We operate responsibly and are dedicated to reducing our environmental impact. When it comes to locating and operating Xcel Energy facilities, we will provide opportunities for affected parties, including those in the most vulnerable communities, to voice their concerns, and will proactively address environmental justice in accordance with state, federal and local law.

Expectations

We expect all employees and third-party suppliers and partners to abide by our Human Rights Position and our Code of Conduct. More specifically, we have the following expectations for each party:



Our Workforce

We expect all of our employees to do what's right, and report what seems wrong. It takes every one of us to shape and sustain the culture we want to have. Retaliatory action against anyone who comes forward to raise concerns about possible violations of this Human Rights Position will not be tolerated. The company will investigate all retaliation concerns and take appropriate action against employees found to have participated in retaliation, up to and including termination of employment.

Suppliers and Other Third-Party Partners

We expect our suppliers of goods and services to adhere to the same values and commitments that the company has outlined in this Human Rights Position, in how they conduct business around the world. In addition, suppliers and other third parties who interact with our employees, customers and other stakeholders are expected to:

- Use safe work practices to help create a safe and healthy work environment.
- Not engage in behavior that intimidates or harasses others.
- Comply with the letter and spirit of applicable U.S. and international labor and employment laws including those associated with equal opportunity, immigration, child labor, forced, trafficked or compulsory labor, working hours, wages and benefits, and a harassment-free work environment.
- Seek, hire and develop diverse suppliers while performing work on the company's behalf.

Internal Monitoring

Xcel Energy monitors its programs and practices to ensure that we are treating our employees in a manner consistent with our stated Human Rights Position. Due diligence includes competitive analysis, benchmarking and employee feedback surveys. Company performance with regards to safety, diversity and inclusion is governed at the highest levels within the company, by our officers and directors.

Mechanisms to Raise Questions or Concerns

Employees, suppliers, customers and other stakeholders can send questions or report human rights concerns by contacting the Corporate Compliance and Business Conduct Office at compliancebusinessconduct@xcelenergy.com or 612-215-5354. Concerns may be raised anonymously and will be thoroughly investigated.

Approval and Dissemination of Information

Xcel Energy senior leadership has adopted this Human Rights Position for access by company stakeholders. It is available through xcelenergy.com and our employee intranet.

Additional Resources

Xcel Energy Corporate Code of Conduct
Xcel Energy Corporate Responsibility Report (please see the Human Capital Management,
Supply Chain Management and Corporate Compliance and Business Conduct briefs