



NORTHERN TECHNOLOGIES INTERNATIONAL CORPORATION EQUAL OPPORTUNITY, NON-DISCRIMINATION, AND ANTI-HARASSMENT POLICY

POLICY STATEMENT

Northern Technologies International Corporation (“NTIC” or the “Company”) strives to create and maintain a work environment in which people are treated with dignity, decency, and respect. NTIC is an equal opportunity employer and believes that professional conduct furthers the Company’s mission, promotes productivity, minimizes disputes, and enhances our reputation. At NTIC, the work environment should be characterized by mutual trust and the absence of intimidation, oppression, and exploitation. NTIC does not tolerate unlawful discrimination or harassment related to any legally protected characteristic or that otherwise violates this Policy.

PURPOSE

This Policy is designed to set forth NTIC’s approach to equal opportunity, non-discrimination, and anti-harassment in the workplace and in work-related settings. It sets standards and expectations for appropriate business conduct and acceptable behavior for persons associated with NTIC. This Policy applies to the entire NTIC organization and those with whom NTIC conducts business.

SCOPE

This Policy applies to all directors, officers, employees, consultants, independent contractors, volunteers, interns, casual workers, students, and agency workers, including any part-time, fixed term, or temporary workers, and any persons employed by or affiliated with NTIC (“personnel”).

This Policy applies to all terms of employment, including recruitment, job assignment, remuneration, benefits, training, promotion, discipline, termination, and retirement. Moreover, this Policy applies in any dealings with clients, customers, suppliers, vendors, visitors, or other work-related contacts. Any conduct prohibited by this Policy is unacceptable in the workplace and in work-related settings, such as during business trips, business meetings, and business-related social events.

PROTECTED CHARACTERISTICS

It is a violation of this Policy for any NTIC personnel to discriminate against or harass an individual on the basis of age, race, ethnic origin or ancestry, color, gender (including

gender identity, gender expression, and gender reassignment), creed, religion (including all aspects of religious belief, observance, or practice, such as religious dress or grooming practices), social origin, family status, marital status, civil partnership status, pregnancy or maternity, physical or mental disability, medical condition, genetic information, sex, sexual orientation, military or veteran status, or any characteristic protected by law ("Protected Characteristics").

EQUAL OPPORTUNITY

NTIC is an equal opportunity employer and is committed to providing employment opportunities without regard to Protected Characteristics. We seek to maintain a highly productive organization of individuals who (i) represent differences in viewpoints, cultures, and experiences and (ii) embrace unique ideas produced by such diversity. NTIC makes employment decisions based on objective business criteria and the qualifications, abilities, and experience of individuals. Specifically, the Company acts in accordance with the following principles when making employment decisions: (i) shortlisting is to be completed by more than one person whenever possible; (ii) vacancies are to be advertised to a diverse section of the labor market, and advertisements shall avoid using language that may discourage particular groups from applying; (iii) job candidates are not to be asked questions which might suggest an intention to discriminate on the grounds of any Protected Characteristic during the interview process or at any time during employment; and (iv) job candidates are not to be asked about health or disability before a job offer is made, except in very limited circumstances allowed by law (e.g., to check that the candidate could perform an intrinsic part of the job, taking in to account any reasonable accommodation). By making employment decisions in accordance with such principles, NTIC is committed to providing employment and advancement opportunities, remuneration, and benefits without discrimination.

NON-DISCRIMINATION

NTIC is dedicated to providing a work environment where all persons can work together safely and productively, free from unlawful discrimination. Any act of unlawful discrimination on the basis of any Protected Characteristic in the workplace or in work-related settings is strictly prohibited. Furthermore, NTIC prohibits (i) any form of discrimination in the provision of employment opportunities, benefits, or privileges; (ii) discriminatory work conditions and behaviors; and (iii) the use of discriminatory evaluative standards in employment. Conditions of service, benefits (including pay, bonus criteria, and all other benefits offered by NTIC), and facilities shall be regularly reviewed to ensure that (i) they are provided on a non-discriminatory basis; (ii) they are available to all personnel who should have access to them; and (iii) there are no unlawful barriers to their access. NTIC expects all personnel to share in its commitment to equal opportunity and non-discriminatory employment.

ANTI-HARASSMENT

NTIC prohibits all forms of harassment. NTIC personnel have the responsibility to avoid any act or actions, implied or explicit, that may suggest any form of harassment to any other person in the workplace or in a work-related setting.

For purposes of this Policy, harassment is defined as unwelcome verbal, written, physical, or nonphysical conduct that denigrates or shows hostility or aversion toward an individual and that (i) relates to any actual or perceived Protected Characteristic; (ii) has the purpose or effect of creating an intimidating, hostile, or offensive work environment; (iii) has the purpose or effect of unreasonably interfering with an individual's work performance; or (iv) otherwise adversely affects an individual's employment opportunities.

SEXUAL HARASSMENT

NTIC prohibits all forms of sexual harassment. For purposes of this Policy, sexual harassment is defined as unwelcome behavior of a sexual nature. Sexual harassment includes, but is not limited to, unwanted physical contact, verbal or written remarks of a sexual nature, written or graphic material of a sexual nature, and disparate or preferential treatment due to an individual's sex.

DIVERSITY AND INCLUSION PRACTICES

NTIC is committed to fostering, cultivating, and preserving a culture of diversity, equity, and inclusion. The collective sum of individual differences, life experiences, knowledge, ingenuity, self-expression, and unique capabilities that our personnel invest in their work represents a significant part of NTIC's culture. As such, all NTIC personnel are expected to exhibit conduct that reflects inclusion during work and in work-related settings. NTIC's diversity initiatives are applicable, but not limited, to our practices and policies on recruitment and selection, including targeted sourcing of personnel from diverse backgrounds; compensation and benefits; professional development and training; advancement opportunities; and the ongoing development of a diverse and inclusive work environment that encourages and enforces:

- Respectful communication and cooperation between all personnel;
- Teamwork and personnel participation, permitting the representation of all groups and perspectives; and
- Company and personnel contributions to the communities we serve to promote a greater understanding and respect for diversity.

To ensure effective teamwork and achievement of common business goals, all NTIC personnel are required to complete a variety of anti-harassment, non-discrimination, and unconscious bias trainings. NTIC's human resources and hiring managers strive to ensure that a diverse slate of candidates is considered for all job openings. Further, NTIC monitors the composition of its current workforce for diversity, age, and gender demographics. The quality of this data is continually improved to ensure that a diverse and talented workforce is maintained. The Company uses this data to enhance its employment and recruitment practices to provide the most inclusive work environment possible. Diversity data is disclosed in line with best practices and as required by law.

Through these practices, NTIC empowers personnel and fosters respect, inclusion, and belonging across the Company. NTIC is committed to further improving and enhancing its

diversity and inclusion practices so that it can better respond to the evolving needs of its workforce and business.

REPORTING

NTIC strongly encourages the prompt reporting of all actual or perceived incidents of discrimination, harassment, or retaliation, regardless of the identity or position of the perceived offender. Personnel and interested parties may report any concerns regarding known or suspected violations of this Policy through the regular procedures established by the Company, including contacting their supervisor or Human Resources Department. Serious violations may also be reported anonymously via NTIC's whistleblowing hotline at (612) 607-7287 to our outside legal counsel.

The availability of this reporting procedure does not preclude individuals who believe they are being subjected to harassment from promptly advising the offender that their behavior is unwelcome and requesting such behavior immediately cease.

The Company will take appropriate and immediate action in response to any complaints, reports, or knowledge of violations of this Policy. All complaints and investigations are treated confidentially to the extent possible, and information is disclosed strictly on a need-to-know basis. The Human Resources Department will take adequate steps to ensure that the complainant is protected against retaliation during and after the investigation. All information pertaining to a complaint or investigation under this Policy will be maintained securely.

No retaliation or hardship, loss of benefits, nor penalty may be imposed on any personnel as punishment for filing a good faith complaint of discrimination or harassment or responding to a complaint of discrimination or harassment. Anyone engaging in retaliation or attempted retaliation may be subject to discipline, up to and including termination.

RESPONSIBILITY FOR THIS POLICY

All NTIC personnel are required to promote equal opportunity and prevent discrimination and harassment in the workplace. They are also expected to help create and maintain an atmosphere where concerns under this Policy can be raised without fear of retaliation or intimidation.

It is the responsibility of the Chief Executive Officer and the Executive Leadership Team to implement, oversee, and monitor the effectiveness of this Policy. This Policy shall be reviewed periodically and revised as necessary to account for changes in circumstances and/or legal or regulatory requirements.