



AN ALLETE COMPANY

Standards of Conduct Shared Facilities

As required in CFR Section 358.7(e) (2), ALLETE's Headquarters Building (ALLETE HQ) at 30 West Superior Street constitutes the only "shared facility" between Minnesota Power's Transmission Provider and its Marketing Function Affiliates. The ALLETE HQ houses executive management and corporate support for Minnesota Power and ALLETE. All Transmission Function employees are located at the Rowe Energy Control Center, the Herbert Service Center and outlying service centers, and are therefore housed in a separate facility from any Marketing Function Affiliates. All transmission control centers are secure and accessible by cardkeys issued only to authorized personnel. Except in emergency situations, Marketing Function Employees are not granted access to Minnesota Power's control centers or similar facilities that differs in any way from the access available to other transmission customers.