

# CMS ENERGY CUSTOMER NONDISCRIMINATION POLICY

The logo for CMS Energy, featuring the text "CMS ENERGY" in a white, sans-serif font, enclosed within a white, stylized oval shape that resembles a swoosh or a partial circle. The logo is positioned in the top right corner of the blue header area.

Consumers Energy will not refuse to provide service or otherwise discriminate in the provision of service to any customer because of age, sex, race, religion, creed, color, national origin, ancestry, height, weight, marital status, sexual orientation, gender identity, disability or veteran status, lawful source of income, level of income, familial status, location of customer in an economically distressed geographic area or qualification for low income or energy efficiency services.

# CMS ENERGY DISABILITY ACCOMMODATION POLICY



CMS Energy's intent is to fully comply with the ADAAA including offering reasonable accommodation to employees and applicants.

Employees who wish to request consideration for reasonable accommodation should contact local Human Resources. Applicants should note such request during the on-line application process or when contacted for an interview.

Generally, requests for accommodation are initiated by the employee or applicant. The company may initiate the reasonable accommodation interactive process, however, without being asked to do so if:

- (1) it knows the employee or applicant has a disability;
- (2) it knows or has reason to know that the employee or applicant experiences workplace problems because of the disability; or
- (3) it knows, or has reason to know, that the disability prevents the employee or applicant from requesting a reasonable accommodation.

A request for reasonable accommodation will be examined on a case-by-case basis to determine whether it will be effective and whether it will constitute an undue hardship on the company. The accommodation process will begin with discussions with the disabled worker. In most cases it will usually involve a review of appropriate medical documentation. All medical documentation is maintained by the Absence Coordination or Workers Compensation areas and treated confidentially. The release of such information is governed by the Confidential Information Policy (PPM 01.19).

While the company will strive to make reasonable accommodation, it may refuse to grant an accommodation to an employee or applicant if the requested accommodation is not reasonable or would cause an undue hardship on its business as provided for in the ADAAA. Undue hardship refers not only to financial difficulty, but also to reasonable accommodations that are unduly extensive or disruptive or those that would fundamentally alter the nature or operation of the business.

# CMS ENERGY INVITATION TO IDENTIFY POLICY

The logo for CMS Energy, featuring the text "CMS ENERGY" in a white, sans-serif font, enclosed within a white, stylized oval shape that resembles a power line or a signal wave.

CMS Energy is a government contractor subject to affirmative action obligations under Section 503 of the Federal Rehabilitation Act of 1973, as amended, and Section 702 of the Uniformed Services Employment & Re-employment Rights Act of 1994 (USERRA), as amended and Vietnam Veterans Readjustment and Assistance Act, as amended. These acts require the Company to not discriminate against and to take affirmative action to employ, and advance in employment, qualified individuals with disabilities, qualified disabled veterans, and protected veterans. Protected veterans include disabled veterans, recently separated veterans, active wartime, campaign badged veterans, armed forces service medal veterans. If you qualify and would like to identify as such, please tell us.

Giving this information is voluntary and refusing to provide it will not subject an individual to any adverse treatment. Information obtained concerning individuals shall be kept confidential, except that supervisors and managers may be informed regarding restrictions or any necessary accommodations, first aid and safety personnel may be informed, when and to the extent appropriate, if the condition might require emergency treatment, and government officials investigating compliance with the acts shall be informed.

No employee or applicant will be coerced, intimidated, interfered with or discriminated against for filing a complaint or assisting in an investigation under these acts.

The Affirmative Action Program For Individuals With Disabilities and Protected Veterans is available for review through the Director of EEO and Employee Relations.

An individual desiring consideration under these programs should contact the Consumers Energy Company Human Resources Department.

# CMS ENERGY RELIGIOUS DISCRIMINATION POLICY



CMS Energy respects the religious beliefs and practices of all employees. Harassment or discrimination based on sincerely held religious beliefs or practices is strongly prohibited. CMS Energy will make, on request, an accommodation for religious beliefs and practices when a reasonable accommodation is available that does not create an undue hardship on the company's business.

## **Requesting a Religious Accommodation**

An employee whose religious beliefs or practices conflict with his or her job or work schedule, or with CMS Energy's practice on dress and appearance, or with other aspects of employment, must request an accommodation from his or her immediate supervisor. The request will include the type of religious conflict that exists and the employee's suggested accommodation.

## **Providing Religious Accommodation**

The immediate supervisor will consult with Human Resources who will assist in evaluating the request. Requests for accommodation will be examined on a case by case basis to determine if a work conflict exists due to a sincerely held religious belief or practice and whether a reasonable accommodation is available that would not create an undue hardship on the business.

The Company does not, and will not, discriminate for or against any coworker or applicant for employment or promotion because of age, sex, race, religion, creed, color, national origin, ancestry, height, weight, marital status, sexual orientation, gender identity, disability or protected veteran status. We will not tolerate discrimination of any kind. The Company will recruit, hire, train and promote persons in all job titles without regard to age, sex, race, religion, creed, color, national origin, ancestry, height, weight, marital status, sexual orientation, gender identity, disability or protected veteran status and will ensure that all employment decision are based only on valid job requirements and that all other personnel actions are administered without regard to the above listed status. This policy applies to all aspects of employment on the job, and applies to benefits to the extent required by law.

CMS Energy is a federal contractor for affirmative action purposes and has related plans per the terms of Executive Order 11246, Vietnam Era Veterans Readjustment Assistance Act, and Section 503 of the Rehabilitation Act and will recruit, hire, train and promote personal in all job titles and ensure other personnel actions are administered without regard to disability, veteran status, race or gender. Coworkers and applicants will not be subjected to harassment, intimidation, threats, coercion or discrimination because they have engaged or many engage in filing a complaint, assisting in an investigation , or other activity related to the administration of these regulations, opposing any act made unlawful by these regulations or exercise any protections of these regulations The full affirmative action program is available to any coworker upon request.

No coworker or applicant will be harassed, threatened, coerced, intimidated, interfered with or discriminated against because of engaging in any of the following activities.

1. Filing a complaint;
2. Assisting or participating in an investigation, compliance evaluation, hearing or any other activity related to the administration of the Affirmative Action provision of VEVRAA, Section 503 of Rehabilitation Act or any other Federal, State or local law requiring equal opportunity for individuals with disabilities, protected veterans, or any other covered status;
3. Opposing any act or practice made unlawful by Section 503 of Rehabilitation Act, VEVRAA, their implementing regulations or any other Federal, State or local law requiring equal employment opportunity;
4. Exercising any other right protected by Section 503. VEVRAA, its implementing regulations or other Federal, State or local laws.

Further, CMS Energy will not terminate or in any other manner discriminate against coworkers or applicants because they have inquired about, discussed or disclosed their pay or the pay of another coworker or applicant. However, coworkers who have access to the compensation information of other coworkers or applicants as part of their essential job functions cannot disclose the pay of others to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation proceeding, hearing, action, including an investigation conducted by the employer, or (c) consistent with the Company's legal duty to furnish information.

In order to implement this policy, the Company will do the following.

1. Follow employment procedures that assure equal consideration and opportunity for all applicants and coworkers.
2. Investigate, upon request, the circumstances of any person who believes that he/she is the object of employment discrimination or harassment, and review the results of that investigation with that person. A person who believes that he/she is the object of employment discrimination or harassment may contact the Director of EEO and People Relations, the Chief Compliance Officer, any People and Culture representative or a member of management. Any coworker who violates the terms of the EEO Policy will be subject to disciplinary action up to and including discharge.
3. Implement its affirmative action programs having the long-term objectives of utilizing minority and female individuals within the Company in the same approximate proportion as minority and female individuals with the requisite skills existing in the labor force, and to employ qualified individuals with disabilities with the long term objective of work force utilization as established by Section 503 of Rehabilitation Act, and hiring qualified protected veterans in accordance with VEVRAA guidelines.
4. Make reasonable accommodations to the physical and mental limitations of a coworker or applicant. Reasonable accommodations are those that do not impose an undue hardship on the conduct of the Company's business.
5. Create and maintain an audit and reporting system that will measure the effectiveness, indicate remedial action, determine the degree objectives have been attained, determine which known protected veterans and individuals with disabilities have had opportunities to participate in all company sponsored educational, training recreational and social activities, measure compliance with Affirmative Action specific obligations, document actions taken and retain documents for prescribed time.

CMS Energy complies with ILO convention, C111-Discrimination.

**RESPONSIBILITY** Responsibility for ensuring proper and consistent implementation of the foregoing lies with the President and Chief Executive Officer (Garrick Rochow) and under his direction, the Director of EEO and People Relations (Rebecca Kosnik) and the Director of Corporate Compliance (Christina Duvall) will actively oversee employment practices in all departments of the Company, to ensure fulfillment of both the letter and spirit of this policy.

# CMS ENERGY RACE AND NATIONAL ORIGIN POLICY

The Company requires that our work environment remain free from unlawful discrimination. It continues to be the policy of the Company that employees have a right to work in an environment free from racial or national origin harassment to or by any employee. Further, Title VII of the Civil Rights Act of 1964 requires an employer to maintain a working environment free of harassment on the basis of race and national origin. The Company will not tolerate racial or ethnic slurs to or by any employee. All employees are responsible for maintaining a workplace free from harassment.

## **Definition**

Racial and national origin harassment occurs when conduct relating to an individual's race or national origin interferes with an individual's work performance or creates an intimidating, hostile or offensive work environment. Prohibited racial and national origin harassment includes the following:

Racial, ethnic slurs or other verbal or physical conduct relating to an individual's race or national origin constitute harassment when this conduct: (1) has the purpose or effect of creating an intimidating, hostile or offensive working environment; (2) has the purpose or effect of unreasonably interfering with an individual's work performance; or (3) otherwise adversely affects an individual's employment opportunities.

## **Responsibility**

**Employee:** Any employee who violates the Racial or National Origin Harassment policy will be subject to disciplinary action up to and including discharge.

**Supervisor:** Every supervisor employed by the Company is responsible to ensure compliance with this policy by those he or she supervises. A supervisor may be subject to discipline up to and including discharge for violations of this policy by a supervised employee, if it is found that the employee was not adequately instructed in the existence or seriousness of this policy or if the supervisor failed to take appropriate corrective action upon learning of misconduct.

## **Complaints**

Allegations of harassment on the basis of race or national origin may be submitted in writing or verbally and will be fully investigated in a fair and timely manner. The Company will investigate allegations in as confidential a manner as possible. If an employee believes he or she has been subjected to harassment, the employee is expected to bring the matter to the immediate attention of any of the following individuals:

- Corporate director of employee relations and EEO
- Chief compliance officer
- Human resources representative
- Member of management
- Employee's supervisor

Retaliation against employees reporting allegations of harassment or cooperating with investigations is unlawful and will not be tolerated.

# CMS ENERGY SEXUAL HARASSMENT POLICY

CMS Energy is committed to providing a work environment that is free from discrimination, including sexual harassment. It continues to be the policy of the Company that sexual harassment to or by any employee is unlawful and will not be tolerated. All employees are responsible for maintaining a workplace free from such harassment.

## **Definition**

Generally, sexual harassment occurs when conduct of a sexual nature explicitly or implicitly affects an individual's employment, unreasonably interferes with an individual's work performance or creates an intimidating, hostile or offensive work environment. Sexual harassment has been defined by the Equal Employment Opportunity Commission as follows:

Unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature constitute sexual harassment when:

1. Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment
2. Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual
3. Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

## **Responsibility**

A romantic or sexual relationship and/or activity between an employee and leader within the same chain of command is strictly prohibited.

**Employee:** Any employee who violates the sexual harassment policy will be subject to disciplinary action up to and including discharge.

**Supervisor:** Every supervisor employed by the Company is responsible to ensure compliance with this policy by those they supervise. A supervisor may be subject to discipline up to and including discharge for violations of this policy by a supervised employee, if it is found that the employee was not adequately instructed in the existence or seriousness of this policy or if the supervisor failed to take corrective action upon learning about misconduct.

## **Complaints**

Allegations of sexual harassment may be submitted in writing or verbally and will be fully investigated in a fair and timely manner. The Company will investigate allegations in as confidential a manner as possible. If an employee believes they have been subjected to sexual harassment, the employee is expected to bring the matter to the immediate attention of any of the following individuals:

- Corporate Director of Employee Relations and EEO
- Corporate Compliance Investigation hotline
- Chief compliance officer
- Human resources representative
- Member of management
- Employee's supervisor

Retaliation against employees reporting allegations of sexual harassment or cooperating with investigations is unlawful and will not be tolerated. Any employee engaging in an act of retaliation is subject to disciplinary action up to and including discharge.