



2026

Third-Party Code of Conduct

AND GUIDE TO ETHICAL BUSINESS BEHAVIOR



The Company We Keep

Internal Compliance HelpLine:
800-CMS-5212 (800-267-5212) or
517-788-6260

Third-party Anonymous HelpLine:
888-440-8464

Website: <https://cms.speakfullynow.com/>

Email: cmscompliance@cmsenergy.com

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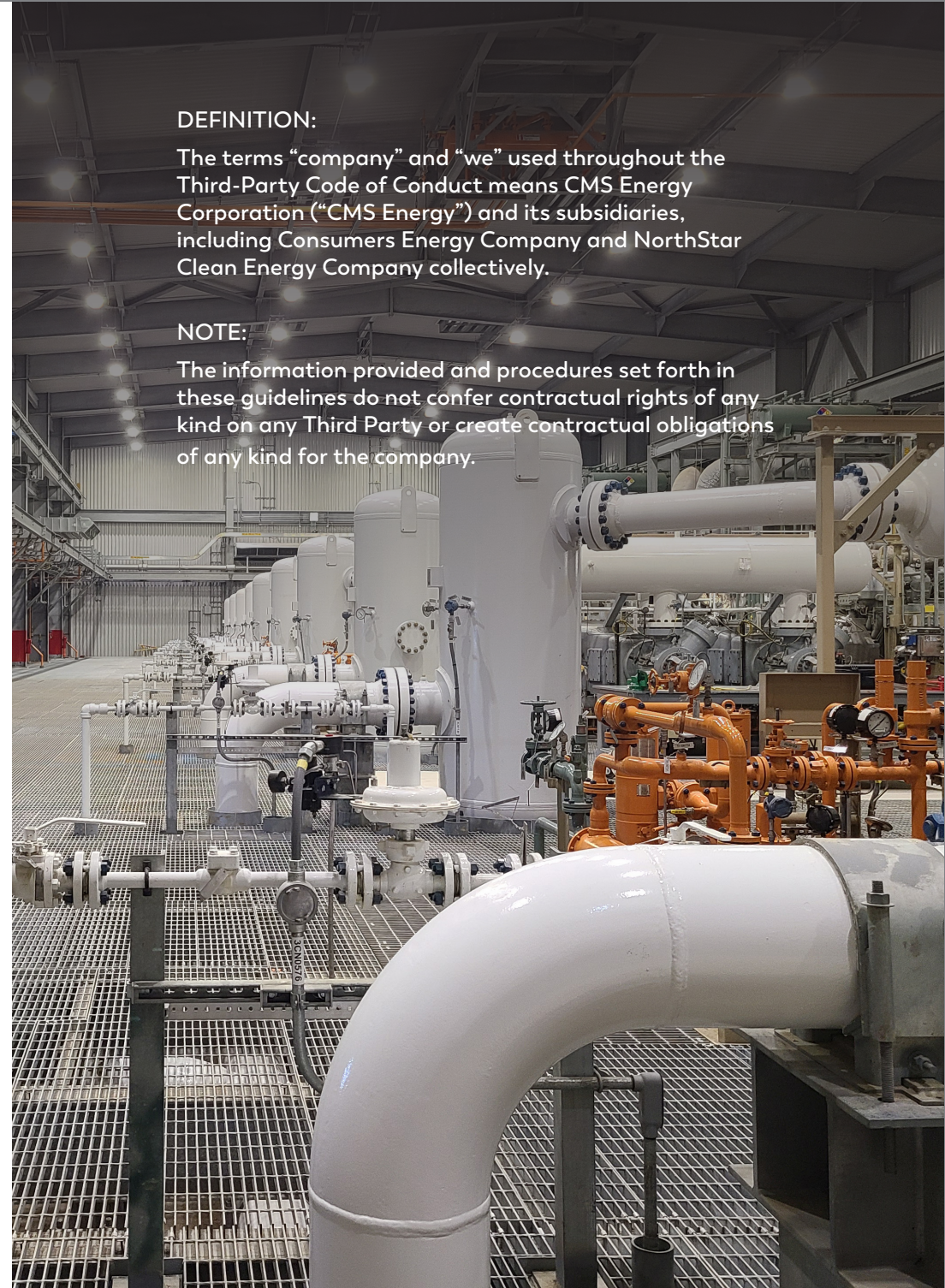
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DEFINITION:

The terms “company” and “we” used throughout the Third-Party Code of Conduct means CMS Energy Corporation (“CMS Energy”) and its subsidiaries, including Consumers Energy Company and NorthStar Clean Energy Company collectively.

NOTE:

The information provided and procedures set forth in these guidelines do not confer contractual rights of any kind on any Third Party or create contractual obligations of any kind for the company.



Ethics is Just Good Business

OUR company has provided customers with affordable, reliable energy to light and warm their homes and keep their businesses running for over 130 years. We believe our long history of serving customers, the federal government and the state of Michigan is a testament to the strong ethical standards that have guided us through more than a century of uncertainty and change.

We expect contractors, consultants and/or other third parties to share our commitment to safeguard our corporate reputation and uphold the cultural values that form the backbone of CMS Energy Corporation ("CMS Energy") and its subsidiaries, including its principal subsidiary, Consumers Energy Company ("Consumers Energy").

This Third-Party Code of Conduct ("Code") establishes minimum expectations for persons or entities who may be authorized to conduct business for or on behalf of CMS Energy and its subsidiaries, including

but not limited to agents, consultants, independent contractors, temporary workers, suppliers, distributors and contractors ("Third Parties" or "you"). This Third-Party Code of Conduct is a guide to our company's standards of integrity and ethical behavior. It provides summaries of corporate policies to help resolve ethical issues that often arise in the context of daily work, in a complex and changing business world, and sets the expectation for our dealings with the people and organizations with whom we interact. Third Parties are expected to ensure all individuals involved in providing services to our company understand and comply with these expectations. CMS Energy may ask Third Parties to demonstrate compliance with and reserves the right to audit adherence to this Code. We also ask our Third Parties to operate in a manner that reflects our values which includes behaving in a safe and professional manner, avoiding conflicts of interest and treating others with respect, fairness and dignity when working on behalf of the company.

Adhering to the highest standards of conduct is the right way to do business. Additionally, in many cases, Third Parties' actions and behaviors represent our company. There are serious individual and collective consequences of unethical behavior, whether or not it is intentional. Consequences include reserving the right to terminate relationships with any Third Party in the event of a violation of this Code.

Although this Code cannot cover every possible situation or cover all applicable rules and laws, we ask Third Parties to raise questions about compliance issues and report actions that don't measure up without fear of retaliation. When in doubt, ask questions or seek clarification by contacting our Compliance department at 800-CMS-5212 or cmscompliance@cmsenergy.com. We value the thousands of Third Parties who work with us. You are a critical part of our daily mission to deliver energy value to our customers, and to uphold the tradition that's served our company and its customers so well for so long.



Safety, Environment and Health

Our company strives to work safely and protect employees, customers, contractors, consultants, the public and the environment. To this end, we expect Third Parties to work safely, and comply with safety and health rules, including any site-specific safety requirements. These requirements extend to any subcontractors Third Parties employ in support of work for the company. You should resolve and are expected to report unsafe working situations and encourage others to work safely. You must be fit for duty when reporting for company-related work and remain fit for duty during working hours.

Our company facilities may be subject to regulated security requirements. As such, it is critical that all Third Parties wear a building access badge at all times, do not share badges, are escorted if they do not have a badge (or are an escorted guest), and return badges and keys when the need for access is removed.

Our company operates in a manner that conserves and protects natural resources and the environment. Third Parties must carry out operations in full compliance with the letter and spirit of all applicable environmental laws, regulations, standards, and the company's [Environmental Policy](#). Third Parties must also comply with any additional environmental requirements specific to the products used or services being provided as called for in design and product specifications and contract documents. Third Parties shall identify and implement opportunities to reduce or eliminate waste and pollution at its source and



SAFETY
24/7
HOME WORK PLAY

to continually improve resource and materials use efficiency.

Alcohol: We prohibit alcoholic beverages on company property, during work hours or on call when being paid by the company, or during a meal period when scheduled to return to work. Third Parties must not report for work — call-out or scheduled assignments — under the influence of alcohol.

Our company is an alcohol-free workplace. You will not bring, use or be under the influence of alcohol while performing work for CMS Energy or its subsidiaries or on company property. Third Parties shall not consume alcoholic beverages during a meal period if they are returning to work for the company after the meal. Third Parties will not work for the company evidencing any effects of alcohol consumption.

Possessing or transporting alcohol on company property, is generally prohibited. Alcohol may be stored in personal vehicles on company property provided that the original seal has not been broken. You also may not drive any company vehicle under the influence of drugs or alcohol, for any reason.

Drugs: Our company is a drug-free workplace. You will not use, possess, sell, provide or be under the influence of illegal drugs or other controlled substances while engaged in company-related work.

You must not use prescription drugs or over-the-counter medications that affect your ability to work safely or efficiently. Third Parties also must comply with fitness for duty policies and regulations.

Safe Driving

Our company complies with State laws which prohibit distracted and unsafe driving practices and Third Parties must do the same. Third Parties will not use a cell phone without a hands-free option and will also always wear a seatbelt while driving on behalf of the company.

Security

All Third Parties shall function in a manner that follows security policies and controls, protects company data, and maintains regulatory compliance. Third Parties are expected to follow physical security protocols by adhering to physical and electronic access controls.

All Third Parties must review the scope of their work with the relevant company contract administrator and understand electronic or physical security controls that may be required for completion.

Third Parties must comply with all background check provisions and confirm that their employees are eligible for access to CMS Energy facilities, information, and systems.

Weapons

Third Parties may not possess licensed or unlicensed weapons on company property, in personal vehicles parked on company property, in company vehicles or while conducting company business. Weapons

are prohibited on all Company property or job sites, including in personal vehicles parked at our facilities. This applies to all parking areas, including owned, leased or temporary property, and show up yards whether fenced/gated or not. The company management must authorize specific exceptions. Weapons include but are not limited to firearms; explosives; ammunition; pellet guns; paintball guns; tasers; bows; arrows; and swords. Knives are also prohibited unless used specifically as a work tool.



Working With Others

AT CMS Energy respect is a given – not something you have to earn. We never tolerate harassing, bullying, hazing and other negative behaviors that create an intimidating, harmful, hostile or offensive work environment or are dehumanizing – on or off the job, including online.

Harassment: Unwelcome conduct based on a person's age, sex, race, religion, creed, color, national origin, ancestry, height, weight, marital status, sexual orientation, gender identity, pregnancy, disability, genetic information or protected veteran status that rises to such a level as to significantly affect an individual's employment, interferes with an individual's work performance or creates an intimidating, hostile or offensive work environment. It includes engaging in hate speech by promoting violence, threatening or directly attacking another verbally or in writing.

Sexual Harassment: Unwelcome advances, requests for sexual favors, or any other verbal or physical conduct of a sexual nature. This can manifest in many forms including through comments, gestures, jokes, images, or unwelcome touching. A romantic or sexual relationship and/or activity between leaders and their subordinates within the same chain of command is strictly prohibited.

Examples of sexual harassment include:

- Inappropriate comments about appearance or clothing
- Sharing or displaying explicit or offensive material.

- Making sexual jokes or innuendos, even if not directed at an individual.
- Unwanted touching, hugging or kissing.
- Persistently contacting someone for non-business reasons after being asked to stop.

Bullying: Offensive, aggressive and/or malicious conduct that undermines, threatens, patronizes, humiliates, intimidates or demeans an individual or team through persistently negative verbal, written, physical or psychological treatment. Bullying actions include, but are not limited to, stalking, online trolling,



intentionally provoking reactions, spreading false information, unwanted physical contact, damaging or taking property, leaving unwanted objects, teasing, name calling and intentionally silencing others.

Hazing: Intentionally excludes or differentiates someone as a test, rite of passage or initiation, whether a willing participant or not, often intending to call attention to status or gauge loyalty through humiliation, embarrassment, isolation, non-standard or demeaning work and/or intimidation.

Retaliation: Negative action(s) against someone for engaging in a protected activity like participating in a CARA review or reporting in good faith a concern.

The company also does not tolerate child labor, involuntary or forced labor and expects Third Parties to comply with appropriate working hour requirements as established by law or relevant collective agreements.

CMS Energy respects human rights. All Third Parties are expected to be strong ethical community partners – forming positive relationships wherever they do business on behalf of the company. This policy underscores our commitment to value and respect human rights across our operations and to conduct business in a way that minimizes any adverse effects our infrastructure or operations may have on people and communities, where possible, independent of what governments may or may not require. Third Parties are expected to:

- Make efforts to avoid causing or contributing to human rights violations;

- Mitigate and/or remediate adverse human rights impacts of company operations where possible;
- Continue to emphasize the importance of speaking up and reporting violations; and
- Prohibit the use of child labor, forced labor, human trafficking, and all forms of modern slavery.

Third Parties must comply with the company's [Human Rights policy](#) and [Labor Rights Workforce Policy](#).

The company expects Third Parties to comply with the letter and spirit of applicable U.S. and international labor and employment laws including those associated with freedom of association, collective bargaining, immigration, minimum living wages, working hours, overtime, benefits and acceptable living conditions.

The company provides a safe and secure work environment and will not tolerate acts or threats of violence committed by Third Parties.

Responsibility for Company Resources

The company monitors its assets and work environments in compliance with applicable federal, state and local laws for a variety of reasons such as promoting safety, preventing criminal activity, investigating alleged misconduct and security violations, and managing information systems.

Username and passwords should never be shared for computer accounts used to access or support company systems.

Third Parties are expected to properly use and safeguard company resources such as information, property, assets, intellectual property, company technology assets (network, phone, Internet, software applications and email systems) and confidential or sensitive information while performing work for the company. You may not use our resources without proper approvals or for purposes other than work activities.

Third Parties that generate records, information or

data pertaining to CMS Energy as a result of the work performed for the company must ensure that those records comply with CMS Energy records management protocols, including retaining records as required by regulation, transmitting records to CMS Energy in a secure manner, and ensuring CMS Energy has full access to all records pertaining to its business.

Third Parties are responsible for protecting any confidential information they possess in the course of their work. Such information includes anything that could potentially be used to place the company — or its employees, customers, shareholders or officers — at a disadvantage. Specific examples of confidential information include:

- Plans, strategies, tactics or organizational structure not announced to the public.
- Financial data or operations results not announced to the public.
- Employees' personal information, including addresses; phone numbers; pay grades; salaries; benefits information; performance evaluations;



Social Security numbers; personal health information; and disciplinary records.

- Nonpublic transmission function or market function information.
- Information protected under a confidentiality agreement or contract.
- Information identified as confidential by a supervisor, officer, or the company.
- Customer and shareholder records such as billing records, personal information and Social Security numbers.

You should presume information provided by or belonging to the company is confidential unless demonstrated otherwise and hold that information in confidence. Third Parties may not use this information for gain or advantage or share it without appropriate company approval. Third Parties must follow established approval processes for obtaining access to confidential information.

Third Parties should not share any information between or among CMS Energy affiliates, including Consumers Energy and NorthStar Clean Energy, without prior written approval from CMS Energy contract managers and/or the Compliance Office. Any approved sharing must still comply with regulatory restrictions as discussed below in the FERC and MPSC Compliance Sections. Third Parties must also obtain proper approvals from CMS Energy contract managers and/or the Compliance Office before sharing information with their own affiliates.

Accurate records and disclosures are critical to meeting

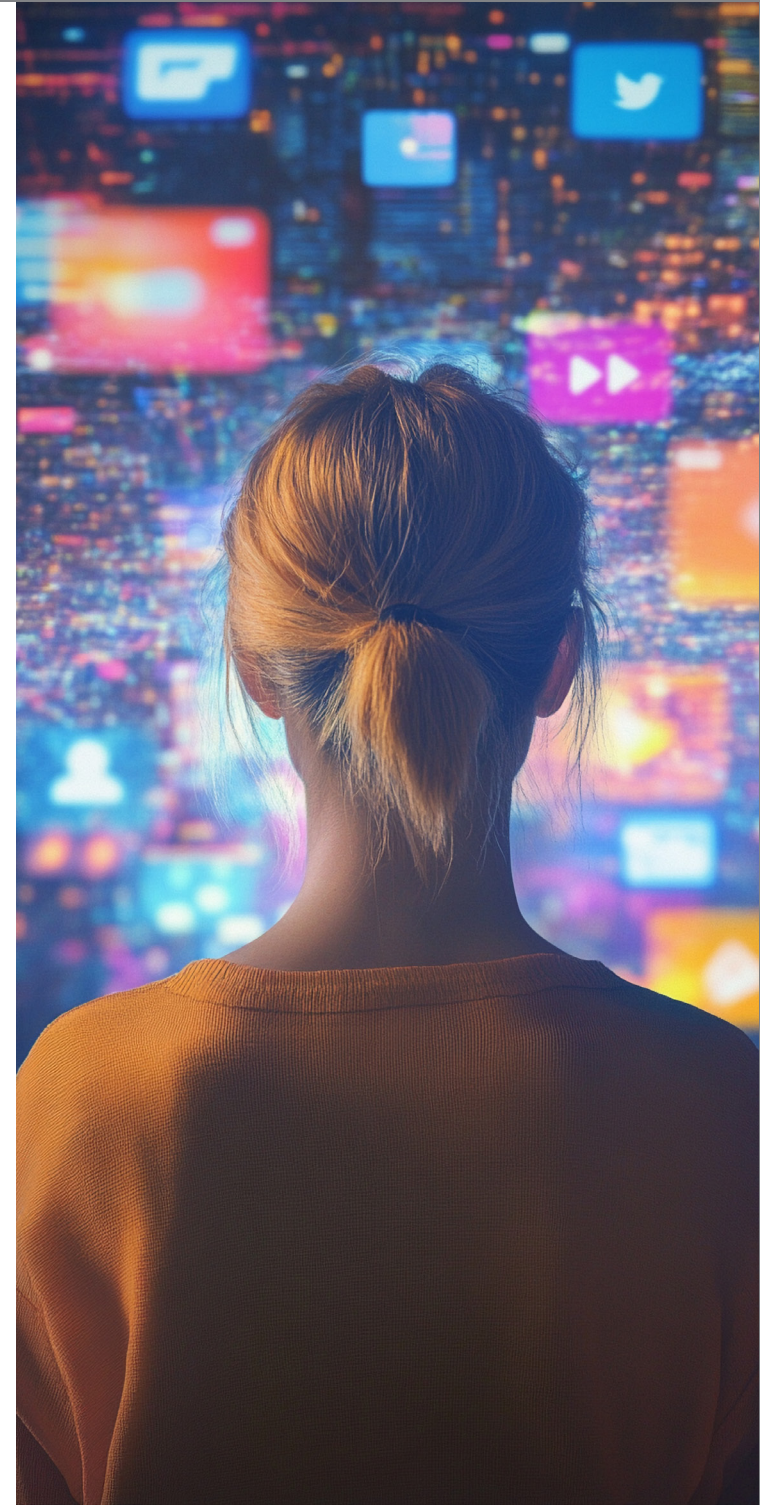
our legal, financial, regulatory and management obligations. You must ensure records such as disclosures; accounts; reports; bills; invoices; time sheets; correspondence; and public communications, are full, fair, accurate, timely and understandable. Never hide, alter, falsify or disguise the true nature of a transaction.

Further, you may not use information obtained in the course of your company-related work to make investment decisions regarding any equity or debt securities if the information has not been publicly disseminated and could have a material effect on the value of the investment. Examples of such information include: expansion plans; major management changes; dividend rates; earnings; mergers; and significant new contracts or projects. Using this information violates our policies and may violate laws or regulations.

Use of Data and Artificial Intelligence (A.I.)

The company considers the ethical collection and use of data, including using data fairly and without bias, to be an important responsibility. Those working with customer and co-worker data are expected to adhere to and promote these principles:

- Follow the rules – Abide by all laws, rules, policies and regulations associated with the use and protection of data.
- Be considerate – Respect the persons behind the data.
- Exercise care – Do not use data in a manner that is already prohibited by law or the Code such as to harass or discriminate.



And always be mindful to immediately report concerns if data is collected, used, released or discarded in questionable ways.

Artificial Intelligence (A.I.) is the broad field of computer science focused on developing systems/ machines which perform tasks that typically require human intelligence, including machine learning, deep learning or generative (generating new output based on the data available) A.I.

Third Parties must ensure that A.I. use on the company's behalf aligns to company standards of transparency and accountability, security and compliance with all applicable laws, regulations and policies.

Responsible A.I. use includes:

- Understanding how to support fairness, avoid bias, and prevent discrimination.
- Monitoring content and filtering to prevent the production and distribution of harmful, offensive, or illegal material.
- Considering potential impacts on both the

company and society by avoiding use that could create or promote misinformation, intentionally mislead or deceive users, or facilitate malicious activities.

- Validating content by humans on a regular cadence (Human-in-the-Loop) to ensure adherence to the items above.

Third Parties utilizing A.I. in support of the company must notify the appropriate CMS Energy contract manager.

Third Parties wishing to utilize A.I. in support of company work must only use A.I. tools that have been approved by the company's Security and Information Technology departments. Third Parties must also adhere to the company's security and data privacy policies additionally ensuring:

- Any data used by A.I. systems is collected with appropriate consent from individuals and in accordance with privacy laws and regulations.
- A.I. systems are implemented and maintained with the intent of protecting data integrity,

confidentiality, and preventing unauthorized access or breaches.

- Internal data must not be accessible to the public or shared through an external A.I. solution without approval.
- Company or customer information must not be uploaded into an external facing A.I. tool without prior approval.
- A.I. will not be used for employment decisions.
- A.I. use will be acknowledged in work products.
- The factual content of A.I. generated material will be validated.
- Training data for A.I. systems must be sourced responsibly, ensuring compliance with intellectual property rights and respecting user privacy.

Questions regarding A.I. use may be directed to the company's Compliance or Security departments or the Security Command Center.



Conflicts of Interest

A conflict of interest is a choice between acting in your interest (financial or otherwise) or in the interest of the company. You must avoid any actions or situations that create conflicts of interest, or the appearance of conflicts, in work related to the company. Additional restrictions may be imposed in contracts between the company and Third Party.

Third Parties should not exchange gifts with a company employee or the employee's immediate family members that is intended to influence business decisions. A gift can be anything of value. Gifts of cash or cash equivalents are strictly prohibited. Common gift examples include trips, meals, or entertainment and sporting event tickets.

Third Parties may donate to company-sponsored charitable events and can contribute a maximum of \$1,000 per sponsored event.

Third Parties must disclose the circumstances of potential conflicts of interest, including close personal relationships with a CMS Energy employee, as soon as possible to company managers or the compliance department.

FERC Compliance

The company is committed to complying with all applicable rules and regulations of the Federal Energy Regulatory Commission (FERC). Among other things, FERC's rules and regulations are intended to promote a fair and competitive market and to ensure there is no preferential treatment or undue advantage provided from a regulated public utility to its affiliated

companies. Third Parties are expected to follow several key FERC requirements outlined below and additional detail is provided in the company's FERC Compliance Policy.

The FERC Affiliate Restrictions Rule states that the company must, "to the maximum extent practical," ensure operational separation between Consumers Energy (as a public utility with captive customers) and its market-regulated affiliate companies (NorthStar and its subsidiaries, such as Dearborn Industrial Generation). The Affiliate Restrictions impose several specific obligations on the company. These include:

- Separation of Functions Rule, which requires operational separation between Consumers Energy and NorthStar. Third parties or functions involved in generation or marketing strategy, fuel supply and procurement, and wholesale market functions may not be shared.
- Information Sharing Restriction Rule, which prohibits sharing of nonpublic market information between Consumers Energy and its affiliates, including NorthStar.
- No Conduit Rule, which prohibits shared third parties or anyone else from conveying non-public market information or otherwise circumventing other aspects of the Affiliate Restrictions.
- Cross Subsidization Rule, which requires prior FERC approval for certain transactions between Consumers Energy and its affiliates. To ensure compliance with this rule, Consumers

Energy and its affiliates may not communicate regarding competitive bids, outside of formal bidding processes, prior to such information being made public.

- Sales of Non-Power Goods and Services Rule, which sets pricing obligations for any sale of non-power goods or services between Consumers Energy and its affiliates. Sales by Consumers Energy to an affiliate must be priced at the higher of cost or market value and sales by an affiliate to Consumers Energy must be at a price that does not exceed the market price.

Separate from the Affiliate Restrictions, FERC's Standards of Conduct for Transmission Providers are intended to prevent unfair treatment or discrimination in the provision of interstate transmission services. Third parties are prohibited from sharing nonpublic transmission function information with marketing function coworkers or third parties. These rules apply both to communication between transmission function coworkers or third parties and marketing function coworkers or third parties of Consumers Energy, as well as communications between transmission function coworkers or third parties of Consumers Energy and marketing function coworkers or third parties of an affiliate. Third parties are required to report any sharing of nonpublic transmission function information with marketing function coworkers or third parties immediately to the CMS Energy Legal and Compliance departments.

FERC's rules and regulations also broadly prohibit market manipulation, and they require a duty of

candor to FERC and entities such as MISO, the MISO Market Monitor, and NERC. Questions about FERC compliance should be directed to the CMS Energy Compliance and Legal departments.

MPSC Compliance

Our company is committed to complying with the Michigan Public Service Commission's (MPSC) rules and standards, which support the delivery of fair and quality service to our customers. The MPSC Code of Conduct prevents cross-subsidization, preferential treatment and prohibited information sharing between our utility's regulated business and unregulated product and service offerings. All Third Parties shall function in a manner that maintains regulatory compliance.

The requirements of the MPSC Code of Conduct include:

- Separation: Functional separation and documented controls between the regulated and unregulated functions shall be implemented in order to prevent anti-competitive behavior, preferential treatment and prohibited information sharing.
- Discrimination or Preferential Treatment: We do not discriminate or provide preferential treatment to the utility's unregulated value-added programs and services (VAPS) and affiliates. Additionally, customers of an affiliate or of unregulated VAPS may not receive preferential treatment such as a discount, rebate, fee waiver, or waiver of the utilities' regulated tariffed terms and conditions.



- Information Sharing: We prohibit sharing information that is obtained by the utility in the course of its regulated business with unregulated divisions, affiliates, or a VAPS.
- The collection, use, protection and release of customer information must also adhere to our Data Privacy Tariffs. This ensures our customers' information is used for only regulated or Commission-authorized utility programs/ services, or primary purpose, unless otherwise authorized and provides our customers control of the release of their information as specified in the Data Privacy Tariffs.
- Marketing: Joint marketing of regulated and unregulated products and services is prohibited.

Federal and State Financial Assistance Awards and Loans

Financial support opportunities can be a great resource to improve our business and support those we serve. In accepting these funds, CMS Energy and its Third Parties must fully adhere to associated State and Federal rules, including the importance of maintaining integrity, accuracy and transparency in reporting for all federally or state funded projects. Third Parties must uphold all regulatory requirements, and complete conflicts of interest or other certifications as appropriate. Third parties must also report misconduct concerns and protect whistleblowers participating with federally funded efforts.

Legal Compliance

In addition to this Code, we expect Third Parties

to abide by all applicable laws and regulations and prevailing industry standards. This Code is intended to be consistent with all applicable laws. If there are any inconsistencies between this Code and any applicable law, we expect Third Parties to work towards higher or more stringent requirements and the applicable law shall control.

Third Parties working on our behalf are expected to abide by regulations, rules issued by, and tariffs approved by the regulatory agencies governing our company and industry. Those regulators include: the Federal Energy Regulatory Commission; North American Electric Reliability Corporation; Michigan Public Service Commission; U.S. Environmental Protection Agency; Department of Homeland Security; Michigan Department of Environment, Great Lakes, and Energy; U.S. Occupational Safety and Health Administration; Securities and Exchange Commission; Michigan Department of Transportation; U.S. Department of Transportation; Michigan Occupational Safety and Health Administration; and the U.S. Department of Energy. In addition, all Third Parties are expected to comply with: i) the Office of Foreign Assets Control's regulations that administer and enforce sanctions against certain countries and individuals and ii) the Fair and Accurate Credit Transaction Act of 2003 regulation for identity theft prevention.

CMS Energy is committed to conducting business in compliance with all applicable laws prohibiting bribery and corruption. Third Parties may not directly or indirectly offer, promise, give or authorize to any individual, which includes public officials or candidates for public office, anything of value in exchange for



an unfair business advantage or influence decision making as it pertains to the company. You may not provide any money, fee, commission, credit, gift, gratuity, compensation of any kind or anything of value to any public official or third party to receive favorable treatment related to your contract with the company. These restrictions include: money or sensitive payments of any kind including payments made on behalf of the individual, candidate or public official, in relation to contracting, property, loans, services, hospitality, favors, employment, entertainment, charitable donations, travel, gifts, discounts, or any other benefit. Sensitive payments include bribes, kickbacks or other illegal or improper payments, or those incorrectly deducted from income taxes. Third Parties working on our behalf must also abide by antitrust laws and the Foreign Corrupt Practices Act, which prohibits bribes, kickbacks and corruption and requires fair dealings and full disclosures.

In addition, Third Parties working on our behalf are required to fully comply with any provisions regarding interactions between affiliates in the energy industry. For business operations outside the U.S., Third Parties are required to adhere to laws of the relevant jurisdiction, as well as U.S. laws that have extraterritorial application.

Our company complies with Sarbanes-Oxley Act requirements related to the accounting, contracting and payment for goods and services. Third Parties may accept orders only when accompanied by an approved company contract, purchase order or charge card. Failure to comply with this requirement may impact our ability to reimburse you for goods or services in a timely manner.

Government officials help shape the legal and regulatory environment in which the company operates. If you interact on the company's behalf with



government officials or candidates for public office, you must understand and comply with the laws and company policies that determine our participation in the political process. Those include state and federal lobbying laws; restrictions and limits on gifts; an approval process for political contributions; reporting of lobbying contacts; and regulatory reporting requirements.

We expect Third Parties to comply with money laundering laws. Money laundering is the process by which the proceeds of illegal activities are moved through legitimate businesses and the world banking systems to remove or hide their illegal source. Be alert for, and promptly report to CMS Energy any knowledge regarding, payments relating to our business that come from unidentified banking accounts or that are unusually large bulk cash payments. These could be funds involved in a money laundering process.

Political Content

Political content includes any item that could be

construed to support a candidate or political party. Third Parties may not bring, display, wear, distribute or showcase any political content on company property or while doing business for the company. Third Parties are also prohibited from displaying political content in any manner while representing the company with external parties including customers or the general public, as this can be interpreted as a company endorsement. Third Parties will be required to remove political content that is brought onto company property.

Copyright Compliance

Copyright laws protect the right of an author to control the reproduction and use of any creative expression of thoughts and ideas such as literary, graphic, photographic, audiovisual, electronic, and musical works.

Our company follows all laws and regulations related to handling copyrighted material. Failing to comply could create serious consequences for the company, and for Third Parties.

Copyright law protects such works even if they do not include a copyright notice. If you wish to use copyrighted material for distribution related to company work, we expect you to obtain permission from the copyright holder before making copies or using any other copyrighted materials.

Advertising & Customer Communications Compliance

Under federal and state laws, all public-facing

advertising, customer communications, and marketing communications “must be truthful, cannot be deceptive, misleading or unfair, and must be evidence-based” (they must be substantiated).

The Federal Trade Commission Act (FTCA), the Controlling the Assault of Non-Solicited Pornography and Marketing Act of 2003 (CAN-SPAM Act), the Telephone Consumer Protection Act (TCPA), and the Michigan Consumer Protection Act are the federal and state laws that primarily govern businesses’ advertising, communications, and marketing activities. In addition, the CAN-SPAM Act and the TCPA provide specific direction on the processes for consumer/customer opt-out of customer-facing marketing and communications.

It is the policy of CMS Energy that CMS Energy’s advertising, marketing, and customer communications shall be in accordance with federal and state laws, rules, regulations, and guidelines.

The Advertising Compliance Policy applies to all marketing, advertising, and customer communications, whether in newspapers, social media, magazines, billboards, text messages, signage at sports and other events, brochures, bill inserts, flyers, etc., and whether delivered by mail, in person, by telephone, by text, by email, or appears on radio, television or the Internet.



All marketing and advertising and customer communications must receive prior approval from the Corporate Communications Department and the Legal Department unless otherwise noted formally by those departments.

All customer communications and their approvals must be documented in a central reviewing and filing system (Aproove unless otherwise noted by the Advertising Compliance Accountable Authority) in the event that CMS Energy is audited by a third-party auditor.

The Advertising Compliance Policy contains details on these laws, rules, regulations, and guidelines. However, the full extent of these details lies with the federal and state agencies overseeing these laws, and CMS Energy employees and Third Parties are expected to understand these laws as written by those agencies.

Endorsements

The company does not endorse products or services or the firms or individuals who supply them. Do not use the company's name or corporate logo in any advertising materials or publicity without obtaining prior written consent from the Compliance or Legal departments.

Third-Party Diversity

The company is committed to providing maximum business opportunities to suppliers certified as minority-, woman-, veteran-, disabled- or LGBTQ-owned and through second tier spend. We do not use set-asides or quotas in administering our Third-Party diversity program and always select vendors based on their qualifications.

Waivers or Exceptions

Only the company's chief compliance officer may grant exceptions to or waivers of this Code. Contact the appropriate company contract administrator if you are seeking an exception or waiver. The administrator will present a business case justification for the waiver or exception to the chief compliance officer.

Reporting Ethical Concerns

Following our standards of conduct is vital to continued prosperous relationships with Third Parties. If you have questions or concerns about compliance or ethics issues while working for our company, or want to report potentially illegal or unethical activities, contact our compliance department at:

[800-CMS-5212](tel:800-CMS-5212) or cmscompliance@cmsenergy.com

You also may anonymously call:

Use our third-party anonymous hotline at [888-440-8464](tel:888-440-8464) or visit cms.speakfullynow.com/ or use the QR Code below.

