

SUPPLIER CODE OF CONDUCT



We at DTE Energy value the business relationships we have with all of our vendors, contractors, and consultants (collectively, our “suppliers”) and, therefore, view them as strategic business partners in our company’s success. As such, we expect those with whom we do business to share the same values and principles that allow our company to enjoy a strong business reputation within the community we serve.

Our standards of conduct are based primarily upon seven values:

We put the health and safety of people first ...and know this responsibility rests with each of us.

We act with integrity and show respect ...and understand this defines our company’s character.

We see our work through the eyes of those we serve ...and know that our work is a powerful means to serve others.

We bring our best energy and focus to our work ...and are fully engaged and accountable for results.

We believe that improvement is our daily responsibility ...and know those we serve have the right to expect that from us

We play to win as a team ...and put the needs of our enterprise first.

We are passionate about the success of our company ...and know that its health and growth generate prosperity.

These values are firmly rooted in who we are as a company and, therefore, our suppliers must also be committed to these values in the conduct of their business.

As an overarching principle, our suppliers must comply with all applicable laws and regulations governing their business activities, but the commitment does not stop there. Ethical business conduct is of paramount importance to our relationship with our suppliers. The following standards, therefore, while not all inclusive, serve as guidelines to our suppliers regarding our expectations for ethical business practices.

Non-discrimination and Equal Opportunity

DTE Energy expects its suppliers to maintain a workplace free from discrimination, where each individual has equal employment opportunity regardless of race, color, sex, age, religion, disability, national origin, citizenship, height, weight, genetic information, marital status, pregnancy, sexual orientation, protected veteran status or any other status protected by law.


Harassment

DTE Energy expects our suppliers to maintain a workplace that is free from all forms of harassment, including sexual harassment. Actions of others that are inconsistent with a supportive and respectful environment must not be tolerated. All complaints alleging harassment should be investigated without the threat of retaliation against the individual who files the complaint.


Diversity and Inclusion

DTE Energy embraces diversity not only in our relationships with suppliers, but in our relationships with our employees,

our customers, our shareholders, and all others with whom contacts are made in the normal course of business. We expect our suppliers, therefore, to equally support an environment that fosters diversity and inclusion based on any personal traits or beliefs, not just those protected under the law. These would include, for example, educational experiences, backgrounds, ages, culture, religions and personal interest, lifestyle, parental status, association membership, political affiliate, or other distinguishing characteristics.



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On supplier diversity, specifically, DTE Energy is committed to use a diverse supplier base, including businesses that are majority-owned and operated by women and minorities as defined by the Office of Small Business Administration. We require that our suppliers have this same commitment, specifically in their use of materials and services from their own base of diverse suppliers and contractors.

Conflict of Interest

DTE Energy expects our suppliers to work with our employees to identify and prevent situations where there is an actual conflict of interest or the appearance of such. Any material transaction or relationship that involves or may involve a conflict of interest or potential conflict of interest must be disclosed promptly.

Records Management and Privacy

DTE Energy expects our suppliers to honestly, accurately, and timely record and report all business information including, without limitation, financial records, to ensure that such information is maintained in a manner consistent with applicable laws and regulations and that effective internal controls are in place to protect and comply with these same requirements. In addition, DTE Energy expects its suppliers to protect the confidentiality and privacy of these records, allowing for their use only by authorized personnel and for authorized business purposes. We expect to be advised immediately of any clerical or accounting errors as they become known and when there may have been an inadvertent disclosure of confidential or private information.

Entertainment, Gifts and Gratuities

DTE Energy expects our suppliers to adhere to our guidelines for the exchange of small business courtesies such as gifts, moderate meals and entertainment. Providing DTE Energy employees with cash or cash equivalent of any kind is strictly prohibited. Acceptable forms of entertainment may include infrequent, moderate gifts or hospitality of a nominal value as part of vendor relationships. Unacceptable forms of entertainment include gambling expenses or sexually explicit entertainment.

Health & Safety

DTE Energy expects our suppliers to provide a safe and healthy work environment for their employees, subcontractors, customers, and all visitors to their premises. This includes, for example, requiring regular safety training and reviews; handling, storing, and using hazardous substances properly; following all safety policies, procedures and work rules, and complying with all local and federal safety regulations. A safe and healthy work environment also requires suppliers and their representatives to be fit for duty during business hours.

Workplace Violence

DTE Energy expects our suppliers to respond to, investigate, and where appropriate, pursue criminal prosecution of their employees for incidents involving illegal acts, public liability and serious injury, threats and workplace violence, including domestic violence that spills into the workplace.

Intellectual Property

DTE Energy expects our suppliers to protect our intellectual property and the intellectual property of others including trademarks, service marks, patented technology and copyrighted information. Confidentiality agreements should be used and enforced to protect sensitive information.

Environment

DTE Energy is keenly aware of our Company's impacts on the environment and is deeply committed to good stewardship as critical to our corporate sustainability – and we expect our suppliers to share this same commitment. Suppliers must conduct their business operations in a way that protects and sustains our environment, and in a manner that complies with all applicable laws and regulations.

Not only does DTE Energy expect our suppliers to adhere to the standards above, we also expect them to ask questions or report concerns regarding possible ethical, legal or regulatory violations so that we can respond, investigate, and resolve these issues. Our Ethics-in-Action Program is a confidential and anonymous reporting system available to all suppliers to raise concerns or ask questions, either through the Internet (at ethicsinaction.dteenergy.com) or by phoning the toll-free number **877.406.9448**. DTE Energy promptly investigates all reports of violations and treats these investigations confidentially to the extent reasonably possible. Suppliers are also expected to fully cooperate in any investigation of concerns that are raised. DTE Energy does not tolerate any form of retaliation against an individual or a firm who raises good faith concerns regarding misconduct of its employees or its suppliers, and we expect our suppliers to follow this same rule.

While no set of guidelines can be all inclusive, adhering to our Supplier Code of Conduct and Values at its foundation is critical to the success of our business partnership. Upholding the highest standards of ethical business conduct is a shared responsibility – ours and our suppliers. It is the responsibility of the supplier to ensure that its representatives understand and comply with this Code. We look forward to doing business with partners who understand this responsibility and join in our commitment to these principles.