



Supplier Code of Conduct:

We at DTE value the business relationships we have with our suppliers, contractors, and consultants (collectively, our “suppliers”) and, therefore, view them as strategic business partners in our company’s success. 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.

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, while not all inclusive, serve as guidelines to our suppliers regarding our expectations for ethical business practices.

Fundamental Human Rights: Non-Discrimination, Equal Opportunity and Freedom from Harassment

Suppliers are expected to treat people with dignity and respect, embrace diversity and diverse opinions, promote equal opportunity for all and help create an inclusive and ethical culture. DTE expects suppliers to treat employees fairly and honestly.

Suppliers shall not demonstrate or tolerate any form of harassment or discrimination. This includes behavior, comments, jokes, slurs, email messages, social media and messaging, pictures, photographs, or other conduct that contributes to an intimidating or offensive environment such as bullying, initiation activities, or workplace hazing regardless of the other person’s willingness to participate. Suppliers must comply with applicable local, state/provincial and federal/national legal requirements prohibiting conduct that could reasonably be construed as sexual in nature, or discrimination or harassment based on race, color, age, gender or gender identity, sex (which includes but is not limited to pregnancy, childbirth, breastfeeding and medical conditions related to pregnancy, childbirth or breastfeeding), sexual orientation, gender expression, transgender status, ethnicity, genetic information, physical or mental disability, religion, religious creed, political affiliation, medical condition, military and veteran status, protected veteran status ancestry, citizenship status, utilization of leaves of absence protected under state or federal law, union membership or marital status. These, or any other non-job-related factor, shall not be used as grounds for discrimination in hiring and employment practices, including advancement, disciplinary decisions, benefits, training, or general workplace conduct.

All complaints alleging harassment should be investigated without the threat of retaliation against the individual who files the complaint.



Diversity, Equity and Inclusion

DTE serves diverse communities and works with suppliers who reflect that diversity. Our company is stronger and more successful when we honor the diversity of people and ideas.

DTE 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. DTE hires individuals with diverse backgrounds and encourages our suppliers to model similar hiring practices.

DTE is committed to utilizing a diverse supplier base, which includes businesses that are owned and operated by: women, minorities (African Americans, Hispanic Americans, Native Americans, Asian-Pacific Americans, or Subcontinent Asian Americans), veterans, service-disabled veterans, members of the LGBT business community and disability-owned business enterprises. DTE expects suppliers will have similar values as demonstrated by sourcing materials and services from diverse businesses.

Conflict of Interest

DTE 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 involving outside activities, financial interests or relationships with family members or close personal friends must be disclosed promptly.

Records Management and Privacy

DTE expects 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 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 expects our suppliers to adhere to our guidelines for the exchange of small business courtesies such as gifts, moderate meals, and entertainment. Providing DTE 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 supplier relationships. Unacceptable forms of entertainment include gambling expenses or sexually explicit entertainment.

Anticorruption

DTE has a zero-tolerance policy for corruption and prohibit anyone conducting business on behalf of DTE, including suppliers, from offering or making any improper payments of money or anything of value to government officials, political parties, candidates for public office, or other persons. This includes the offer and/or receipt of any bribe or kickback to and/or from any customer, supplier or others. Suppliers must comply with the anti-corruption laws that govern operations in the countries in which they do business, such as the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act.

Anti-competitive practices

DTE competitively bids our product and services. Supplier must avoid business practices such as entry into arrangements that unlawfully restrain competition; the improper exchange of competitive information; price fixing, bid rigging, or improper market allocation.

Health & Safety

DTE 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. If requested by DTE, the supplier should upload safety and risk data in our third-party contractor's cloud-based solution. A safe and healthy work environment also requires suppliers and their representatives to be fit for duty during business hours.

Occupational health and safety

- **Public Safety:**

Supplier shall identify and eliminate all potential public safety hazards associated with any activity, service or product or equipment/tool deployed in the execution of a service for or on behalf of DTE. Where hazards cannot be eliminated, they shall be controlled to within acceptable regulatory limits and recognized industry best practices. Appropriate public engagement, communication and access control shall be undertaken to ensure no hazard exposure nor harm to the public.

- **Occupational Safety:**

Suppliers shall identify workforce exposure to safety hazards via risk assessments and job safety analysis. Hazards shall be eliminated or controlled through proper design, engineering, procedural controls, and ongoing safety training. Where hazards cannot be adequately controlled by these means, the workforce shall be provided with appropriate, well-maintained personal protective equipment. As critical partners in achieving zero workplace injuries, DTE contractors and suppliers are encouraged to report near misses and are empowered and expected to stop the job if they observe work being performed in an unsafe manner by either a DTE employee, DTE contractor, or third party conducting DTE-related work, or working around a DTE facility.

- **Vehicle Safety:**

Suppliers shall ensure that all vehicles used, and transportation activities undertaken in the execution of DTE business are compliant with applicable Department of Transportation and Department of Motor Vehicles regulations and codes. When operating a vehicle for DTE business, drivers shall carry a valid driver's license, always comply with the state vehicle code, and operate their vehicle safely, including minimizing all distractions while driving and obeying all posted road regulations.

- **Industrial Hygiene:**

Occupational hygiene and medical surveillance methods shall be implemented by supplier for all applicable work activities to identify, eliminate and/or control workforce exposure to chemical, biological, and physical agents and to provide ongoing monitoring and surveillance of affected personnel. Engineering or administrative controls shall be used to control overexposures. When hazards cannot be adequately controlled by such means, the health of the workforce shall be protected by appropriate personal protective equipment and programs.

Please see the [Contractor Safety Handbook](#) available on our web site.

Investigations

DTE 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.

Privacy and Intellectual Property

Suppliers will act lawfully and with integrity in the handling of competitive data, proprietary information, and other intellectual property. DTE 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. Suppliers will comply with legal requirements regarding fair competition and antitrust, and accurate and truthful marketing.

Protecting and Caring for DTE Assets and Property

DTE at times will provide tools, equipment, and materials to our service contractors to perform work. We expect our suppliers to care for and respect DTE property and assets in their possession against theft, damage and loss.

Environment

DTE is keenly aware of our company's impacts on the environment and is deeply committed to good stewardship as critical to our environmental goals and aspirations – 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.

Environmental standards for the suppliers' processes, products, or services

- **Compliance with Environmental Legal Requirements:**

Supplier must carry out operations in full compliance with the letter and spirit of all applicable environmental laws, regulations, and standards. Supplier will also comply with any additional environmental requirements specific to the products or services being provided to DTE as called for in design and product specifications and contract documents.

- **Pollution Prevention and Resource Preservation:**

Supplier shall identify and implement opportunities to reduce or eliminate waste and pollution at its source and to continually improve resource and materials use efficiency. We expect suppliers to offer products and services with consideration of the environmental impact of those products and services. We encourage suppliers to provide innovative solutions that minimize environmental impacts across the value chain.

Remuneration

Supplier must comply with all applicable wage and benefit laws and regulations, including laws of other countries as applicable.

Right to collective bargaining

Supplier must comply with all applicable laws relating to employees' rights to engage in concerted activity or collective bargaining, including laws of other countries as applicable.

Child labor

Supplier shall not employ any person under the minimum legal age for employment as prescribed by the relevant local authority, or under the age for completing compulsory education, whichever is greatest. Legitimate workplace apprenticeship programs, which comply with all laws and regulations, are supported. Workforce members under the age of 18 shall not perform work that may expose them to hazards.

Forced labor

DTE prohibits the use of forced or involuntary labor whether bonded, imprisoned, or indentured, including debt servitude and all forms of human trafficking. This includes the use of any form of threat, force, coercion, fraud, or exploitation. All members of the workforce will understand the terms of their employment. Withholding of, or destruction of, employee identity or immigration documents, passports or work permits is prohibited.

DTE's goal is to have a work environment where employees and suppliers feel safe to report issues without fear of retaliation or retribution. Not only does DTE expect our suppliers to adhere to the standards above, but 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.

DTE 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 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. Our Ethics-in-Action Helpline is a confidential and anonymous reporting system available to all suppliers to raise concerns or ask questions, either through our web site at ethicsinaction.dteenergy.com or by calling 877.406.9448.

While no set of guidelines can be all inclusive, adhering to our Supplier Code of Conduct 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.