

CMS Energy Corporation and its subsidiaries (collectively “CMS Energy” or “Company”) is committed to helping create a world where all people are respected and included, valued for their unique qualities and abilities, treated fairly and afforded the opportunity to advance and to protect the rights of women, minorities, LGBTQ+, veterans and all people. Our Board of Directors (“Board”) is responsible for overseeing human rights risk management and our management team is accountable to the Board for ensuring this policy is effectively implemented.

Purpose

CMS Energy respects human rights. All employees (also known as co-workers) are expected to be strong ethical community partners – forming positive relationships wherever we do business. This policy underscores our commitment to value and respect human rights across our operations and to conduct business in a way that minimizes the adverse effects our infrastructure or operations may have on people and communities, where possible, independent of what governments may or may not require. In addition to our co-workers, these standards of conduct also apply to our vendors, suppliers, contractors, distributors, consultants, agents, temporary workers, and partners, with no exception.

Company Commitment

We will:

- Make efforts to avoid causing or contributing to human rights violations.
- Mitigate and/or remediate adverse human rights impacts of our operations where possible.
- Continue to emphasize to employees the importance of speaking up and reporting Code of Conduct violations.
- Prohibit the use of child labor, forced labor, human trafficking and all forms of modern slavery.
- Prohibit procuring commercial sex acts, use of misleading practices during recruitment of employees, charging employees or applicants recruitment fees.
- Be compliant with the terms of FAR FAC 2022-06 in all matters above.
- Be transparent in our efforts, successes and challenges.

Diversity, Equity & Inclusion

The overall goal of our Diversity, Equity and Inclusion (“DE&I”) strategy is to embed DE&I into everything we do. The Company will do this by focusing on three strategic pillars:

- Our Culture: Embedding DE&I into all our co-worker interactions.
- Our Processes: Ensuring all our processes incorporate DE&I.

- Our Talent: Attracting and retaining a diverse workforce where all can thrive equally.

Our strategy will be measured through key metrics that exist throughout every level of the organization, allowing us to achieve our overall vision and create a co-worker experience that allows all co-workers to succeed. Our strategy applies to all levels of the organization, including the Board, senior management and all workforce levels and includes gender, race, ethnicity, national origin, age, religion, sexual orientation, gender identity and expression, physical or mental ability, veteran status and all other facets of diversity that makes each of us unique.

Transparency on key topics such as human rights enables informed decision making and builds trust with shareholders, customers, community leaders, co-workers, vendors, suppliers, contractors, distributors, consultants, agents, temporary workers and partners.

Fair and Equitable Pay

We take action to ensure our co-workers are paid fairly and competitively. We compensate our co-workers relative to our industry and in accordance with collective bargaining agreements. We regularly evaluate our pay competitiveness and equity, and we comply with minimum wage, work hours, overtime and benefits laws.

Community and Stakeholder Engagement

CMS Energy recognizes its impact on the communities where we operate. We are committed to engaging with stakeholders in those communities to ensure that we are listening to, learning from and taking into account their views as we conduct our business. Where appropriate, we are committed to engaging in dialogue with stakeholders on human rights issues related to our business. We believe that local issues are most appropriately addressed at the local level. We are also committed to creating economic opportunity and fostering goodwill in the communities where we operate through locally relevant initiatives.

Ethics and Compliance Training

Co-workers have a responsibility to preserve the ethical standards of our Company as it conducts business affairs, even when no laws or regulations are involved. Our Company policies and the Employee Code of Conduct and Guide to Ethical Business Behavior (Code of Conduct) outlines our standards, provides guidelines for acceptable co-worker behavior and clarifies common dilemmas. In many cases, the policies referred to in the Code of Conduct go beyond legal requirements. Third parties are also required to comply with our Third Party Code of Conduct. Our codes can be found at www.cmsenergy.com/corporate-governance/compliance-and-ethics.

Reporting Concerns

If a co-worker, contractor, business partner, supplier, customer or other stakeholder, witnesses or learns of any incident that may involve a violation of this policy or our Code of Conduct, they should report their concern or grievance,

anonymously if desired, via the Company's HelpLines, available 24 hours a day, seven days a week:

Internal Compliance HelpLine:
800-CMS-5212 (800-267-5212) or 517-788-6260
Email: cmscompliance@cmsenergy.com

Third-party Anonymous HelpLine
866-ETHICSP (866-384-4277)
Website: www.ethicspoint.com

EnerBank Third-party Anonymous HelpLine
855-319-8479

In addition to the HelpLines above, Company co-workers may report a concern to their immediate supervisor or department head; the chief compliance officer or corporate compliance department; the People and Culture department; the corporate director of employee relations and equal employment opportunity; the legal department or the corporate security command center.

The Company expects Third Parties to comply with the letter and spirit of applicable U.S. and international labor and employment laws as well as our Third Party Code of Conduct. Employees who observe or have reason to suspect misconduct on the part of any vendor/supplier to the Company, including contractors, agents, or consultants should report the incident(s) to their supervisor, the People & Culture Business Partner or the Compliance Department. All concerns will be investigated by the Compliance Department according to Company standards.

[Investigation of Concerns](#)

Investigation of Code of Conduct violations happens within the Company's Compassionate Action Restorative Action (CARA) process. CARA combines the rigor and analysis of CAPA (Corrective Action Preventative Action) with the sustainability of restorative justice practices. The objectives of CARA are (1) to solve Code of Conduct problems so they don't happen again and (2) to treat people with dignity and respect throughout the process. The CARA process has a continuous monitoring and improvement review to look for trends and ensure discrimination/harassment are discovered and dealt with appropriately. Trends are reviewed to assess the effectiveness of compliance and are shared with senior management and the Board on a periodic basis. The top ~700 leaders are required to annually complete a disclosure regarding compliance with our Code of Conduct, including addressing concerns and supporting the Company's CARA process.

On an annual basis, the chief compliance officer requests that internal audit review select Code of Conduct policies/processes for compliance and effectiveness. The chief compliance officer may also request additional audits on an ad hoc basis. If an internal audit identifies defects, the chief compliance

officer and internal audit monitor management action plans to cure the defects.

Responsibility

Co-workers are responsible for knowing, understanding and following the regulations, laws and policies that apply to their jobs and are required to report concerns or potential misconduct.

All new co-workers receive our Code of Conduct and other core compliance training and access to our policies and procedures. To increase the level of awareness and reaffirm our commitment to high standards of legal and ethical conduct, all salaried co-workers are required to annually review the Code of Conduct and certify their personal commitment to compliance by affirming their compliance with our Code of Conduct. This is a condition of employment and must be completed annually. Our union workforce co-workers are not required to certify, but they are sent an annual review requirement for which responses are tracked.

Continual co-worker development and awareness of potential ethical dilemmas continue to be priorities to ensure a culture of compliance and ethics. The Company provides training, leader assistance to address concerns, materials for leaders to address noncompliance and targeted leader training and coaching as needed.

Training topics include but are not limited to:

- Ethics and compliance.
- Diversity and inclusion.
- Workplace harassment.
- Discrimination prevention.
- Behavioral expectations.
- Securities trading rules for identified personnel.

Security

CMS Energy strives to provide a safe and secure work environment free from violence or threats of violence (TOV). We take the security of our co-workers and customers. We:

- Partner with the Michigan Intelligence Operations Center through sharing information that pertains to any act of violence or threat whether to co-workers or customers.
- Mitigate potential threatening or dangerous situations by educating our co-workers via annual mandatory training regarding workplace violence and volatile situations.
- Create awareness of our working environment by providing all co-workers with the knowledge and ability to sign up for TOV notifications as well as access to our GIS potential threat tracking map.
- Provide training and guidance for our customer-facing co-workers to report dangerous situations whether to the co-worker or the customer.

If violence or imminent danger to the safety of co-workers occurs, co-workers are instructed to immediately call 911 first, then our security command center as soon as reasonably possible.

Our approach to human rights is inspired by applicable international human rights principles expressed in the Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the United Nations Global Compact and the United Nations' (UN) Guiding Principles on Business and Human Rights. This Human Rights Policy is intended to summarize certain commitments of the Company and is not intended to state all principles that will guide CMS Energy in its commitment to human rights.

Definitions

Human Rights: Human rights are rights inherent to all human beings, regardless of race, color, national origin, ancestry, citizenship, religious creed, physical or mental disability including HIV and AIDS, cancer, genetic characteristics, marital status, sex, sexual orientation, gender identity or expression, age, pregnancy, childbirth, or related medical conditions, family and medical care leave, military status, or political affiliation. Human rights include the right to life and liberty, freedom from modern slavery and torture, freedom from harassment and discrimination, freedom of opinion and expression, the right to work and education, access to water, and many more. Everyone is entitled to these rights, without discrimination.