

# Summary of Code of Conduct Revisions - 2026



## REVISIONS TO THE EMPLOYEE CODE OF CONDUCT:

The CMS Energy Code of Conduct ("Code") applies to all CMS Energy employees (including the chief executive officer, chief financial officer, and principal accounting officer and controller or persons performing similar functions). The 2026 Code will be effective January 29, 2026.

### The 2026 CMS Energy Code revisions include, among other things:

- Updates to the following sections:
  - **No Place for Violence** - Updated to clarify that weapons are prohibited on all company property (even if licensed for concealed carry) or job sites, including personal vehicles parked at our facilities.
  - **Equal Employment Opportunity (EEO)** - Updated to include new third-party vendor that administers the Company's Family Medical Leave, Accommodations requests and Short-Term Disability-Sick Leave benefits.
  - **Equal Employment Opportunity (EEO)** - Updated to add 'pregnancy'
  - **Outside Employment** - Updated to include Outside Employment Approval Form.
  - **Supporting Our Planet** - Updated the introduction to this section to remove reference to specific dates to achieve goals.
  - **Fostering Prosperity** - Updated section to remove a specific timeline for ending the use of coal.
  - **Use of Company Assets** - Updated to include reference to vehicles and link to the Corporate Vehicle Policy.
  - **Recording Conversations** - Updated to include the use of AI or any other systems to capture meeting notes.
  - **Modeling the Way** - Updated to include leader expectations.
  - **Handling Concerns** - Updated graphic to reflect CARA process changes.