

# **CMS Energy Corporation**

## **Labor Rights Workforce Policy**

### ***Our Culture***

We (CMS Energy and its subsidiaries) enable our co-workers (employees) to live the values of our company culture: caring, empowered, deliberate, agility and ownership. This includes caring for not just our co-workers but also the communities we serve. The cultural mindset guides the actions and behaviors of all co-workers, allowing the company to work safely to serve our customers and our communities. Each value is critically important, and all work together to achieve our goals.

We comply with all applicable United States federal, state, and local laws and regulations concerning our co-workers and labor issues in each of the states in which we conduct business. We acknowledge certain standards, such as those found in the International Labor Organization (ILO) 87 and 98, which help inform our approach to our workforce and labor policies. To the extent these standards conflict with rights and obligations under United States federal, state, and local laws and regulations, our policies are developed and carried out consistent with United States federal, state, and local laws and regulations.

### ***Equal Opportunity***

CMS Energy does not, and will not, discriminate for or against any employee or applicant for employment or promotion because of age, sex, race, religion, creed, color, national origin, ancestry, height, weight, marital status, sexual orientation, gender identity, disability or protected veteran status. The Company will recruit, hire, train and promote persons in all job titles without regard to age, sex, race, religion, creed, color, national origin, ancestry, height, weight, marital status, sexual orientation, gender identity, disability or protected veteran status and will ensure that all employment decisions are based only on valid job requirements and that all other personnel actions are administered without regard to the above listed status. This policy applies to all aspects of employment on the job and applies to benefits to the extent required by law. We also take affirmative measures to employ and advance qualified females, minorities, individuals with disabilities, disabled veterans, recently separated veterans, other protected veterans, and Armed Forces service medal veterans. We follow company employment procedures to comply with applicable employment law in a consistent manner.

### ***Collective Bargaining***

Excellent relations with our employees enable our success. We acknowledge the right of our employees to associate freely and bargain collectively, in compliance with federal and state laws. Employees are expected to comply to our company policies and collective bargaining agreement provisions, as applicable.

The Michigan State Utility Workers Council (MSUWC) is the exclusive bargaining agent for our represented Operating, Maintenance, & Construction (OM&C) workforce and our Customer Contact Center employees. The MSUWC is a division of the Utility Workers

Union of America (UWUA) and they represent a little over 40% of our overall workforce. Consumers Energy has individualized collective bargaining agreements with each of these groups separately.

In addition to the OM&C and Customer Contact Center work groups, our Zeeland Plant location has a unionized workforce who are represented by the United Steel Workers (USW) and we have a separate collective bargaining agreement specific to this group.

### **Third Parties**

We expect our business partners, agents, consultants, independent contractors, temporary workers, suppliers, distributors, contractors, and/or other third parties to ensure all individuals involved in providing services to our company understand and comply with our expectations. We ask that Third Parties 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. We expect third parties to work safely, and comply with safety and health rules and regulations, including any site-specific safety requirements. For more, visit our [third-party code of conduct](#).

### **Monitoring**

Annually we conduct internal audits over the components of Executive Order 11246 – Equal Employment Opportunity, the Vietnam Era Veterans' Readjustment Assistant Act (VEVRAA), and Section 503 of the Rehabilitation Act to ensure our policies and practices provide a workplace free of harassment or discrimination. The audit reviews hiring, terminations, promotion data, external outreach, vendor contracts, etc. We conduct annual compensation reviews for pay equity through a third-party law firm. In addition, we are subject to audit over the same provisions by the Office of Federal Contract Compliance Programs (OFCCP) via their random process.