

CMS ENERGY CORPORATION HUMAN RIGHTS POLICY

This policy along with CMS Energy Corporation’s articles of incorporation, amended and restated bylaws, corporate governance principles, committee charters, and other policies pertaining to corporate governance and regulatory compliance, risk, and social responsibility (collectively, the “Corporate Governance System”) form the framework of governance for CMS Energy Corporation and its subsidiaries (collectively, “CMS Energy”). The Corporate Governance System is inspired by and based on our commitment to ethical principles, transparency and leadership in the application of best practices in good governance and is designed to be a working structure for principled actions, effective decision-making and appropriate monitoring of both compliance and performance. 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 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 employees, these standards of conduct also apply to our vendors and suppliers, with no exception.

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;
- Prohibit the use of child labor, forced labor or human trafficking; and
- Be transparent in our efforts, successes and challenges.

Respect for human rights is essential to the sustainability of our business and the communities in which we operate. Transparency on key topics such as human rights enables informed decision making and builds trust with shareholders, customers, community leaders, employees, business partners, suppliers and other stakeholders. These stakeholders represent many different races, nationalities, religions, cultures and customs.

We believe in the dignity, human rights and personal aspirations of all people. This belief is foundational to our Code of Conduct and to our commitment to diversity and inclusion. Our approach to human rights is inspired by applicable international human rights principles expressed in the Universal Declaration of Human Rights, the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work, the United Nations Global Compact, OECD Guidelines for Multinational Enterprises and the United Nations’ (UN) *Guiding Principles on Business and Human Rights*. This policy is intended to summarize certain commitments of the Company and is not intended to state all principles that will guide CMS in its commitment to human rights.

Community and Stakeholder Engagement

CMS Energy recognizes its impact on the communities in which 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 in which we operate through locally relevant initiatives.

Ethics and Compliance and Training

Employees 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 employee 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.

If a 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

Employees 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. In addition to the HelpLines above, company employees may report a concern to their immediate supervisor or department head; the chief compliance officer or corporate compliance department; the human resources department; the corporate director of employee relations and equal employment opportunity; the legal department or the corporate security command center.

All new employees 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 employees are required to annually confirm their personal commitment to compliance by affirming their compliance with our Code of Conduct.

Driving a culture of compliance and ethics throughout the company continues to be a primary focus. Continual employee development and awareness of potential ethical dilemmas continue to be a priority. Employees complete learning events throughout the year on a variety of ethics and compliance subjects, such as workplace harassment and discrimination prevention, inappropriate behaviors at work, and corporate securities trading rules for identified personnel. Providing leaders the appropriate resources to continue effectively addressing and preventing ethical misconduct and noncompliance also remains a priority. Materials for leaders to use to guide discussions with their staff about ethics and compliance matters are also developed and used with the employee learning events during the year. Additionally, and as determined appropriate, other materials on specific topics are communicated to leaders and employees through various other channels.

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 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.