

## DTE Energy Policy OP10 Corporate Political Participation

Revision 1.1

March 18, 2021

### **1. Applicability**

This policy applies to all employees of DTE Energy and its subsidiaries.

### **2. Policy**

#### A. General

1. DTE Energy is committed to being a responsible corporate citizen and to complying with all applicable laws.
2. As an energy company, we are affected each day by the decisions of federal, state and local officials. DTE Energy is an active participant in the political process and encourages its employees to participate in the process.
3. DTE Energy supports public policies that promote its commitment to sustainable, reliable, affordable and safe energy. DTE Energy's decisions on corporate and Political Action Committee (PAC) contributions, and support for trade and business associations, recognizes these policy positions and a wide range of other criteria, including policies that help our local communities prosper and flourish while promoting opportunity for all in an open and just society.

#### B. Corporate Contributions

1. DTE Energy may use corporate treasury funds only for legally permissible contributions to political organizations for initiatives that support the goals and business objectives of the Company. Such contributions are generally made only upon a specific request from such an organization.
2. DTE Energy will comply with all applicable laws governing its legally permissible corporate contributions to political organizations. Federal and Michigan law strictly prohibits the direct contribution of corporate treasury funds to candidates running for federal and state office or to their campaign committees. Also, as a general practice, we do not make independent political expenditures with corporate treasury funds. For DTE's purposes, independent expenditures are defined as those funds expended by the company to directly support or defeat a candidate. If for some reason DTE does make an independent political expenditure, the company would disclose in a manner consistent with our voluntary disclosure policy.
3. Under no circumstances may any employee make a corporate commitment of Company resources for a political contribution or expenditure, either cash or noncash, without the approval of the Vice President, Corporate & Government Affairs. DTE Energy will not reimburse any employee for a political contribution or expenditure.

4. DTE's corporate political contributions shall be made for the benefit of the Company and will be made without regard to the personal political preferences of Company officers and executives.

5. DTE will make contributions, using corporate treasury funds, to 527 organizations, which are tax-exempt organizations that engage in political activities, Super PACs and Ballot Question Committees. DTE Energy also makes contributions to 501(c)(4) organizations whose primary purpose is to promote social welfare through active engagement with the community, and may utilize funds for policy and political purposes in alignment with IRS guidelines and requirements. This information is included in the annual report of PAC and political activities presented to the Public Policy and Responsibility Committee of the DTE Energy Board of Directors.

6. DTE Energy's corporate contributions are guided by a criteria that includes:

- a. Public integrity of the organization
- b. Representation of the interests of DTE stakeholders
- c. General support for the issues important to the company
- d. Assessment of the appropriate level of support to be provided

#### C. Political Action Committee

1. We encourage our employees to become informed about the policy matters affecting DTE Energy and to be involved in the political process. DTE Energy facilitates this participation through the DTE Energy Political Action Committee (PAC).

2. As prescribed in its bylaws, the DTE Energy PAC is required to comply with all relevant laws governing its participation in the political process.

3. The DTE Energy PAC is funded by voluntary contributions from eligible employees with lawful administrative support from DTE Energy.

4. DTE Energy PAC contributions are guided by a steering committee comprised of PAC members from across the company that are elected by all PAC members. The following criteria are used in evaluating requests for contributions:

- a. Public integrity of the candidate
- b. Leadership position or committee service
- c. Representation of a district that includes a DTE Energy facility or service area
- d. General support on issues important to the Company
- e. Assessment of the appropriate level of support to be provided

5. This information is included in the annual report of PAC and political activities presented to the Public Policy and Responsibility Committee of the DTE Energy Board of Directors.

#### D. Trade Associations and Chambers of Commerce

1. DTE Energy belongs to a number of 501(c)(6) trade associations and chambers of commerce, some of which participate in the political process. DTE Energy may not always agree with positions taken by these organizations.

2. DTE Energy will request that these organizations to which our dues or payments are significant provide a breakdown of the portion of our dues or payments that were used for political contributions. This information is included in the annual report of PAC and political activities presented to the Public Policy and Responsibility Committee of the DTE Energy Board of Directors.

#### E. Disclosure

1. DTE Energy will voluntarily disclose contributions in a manner that reflects the current requirements for recipients based on applicable federal and state campaign finance and tax laws.

2. The Company's political activities including 501(c)(6), 501(c)(4) and 527 organizations, Super PACs, Ballot Question Committees, and PAC contributions will be reviewed annually by the Public Policy and Responsibility Committee of the DTE Energy Board of Directors. Such an oversight process provides for greater accountability and transparency for the Company's corporate political activities.

To promote transparency for shareholders, DTE Energy will semi-annually post on a publicly available DTE Energy Internet site the following information:

- a. A copy of the DTE Energy Policy OP-10 - Corporate Political Participation
- b. Links to the Internet sites of the Federal Election Commission and Michigan Bureau of Elections, which provide information about contributions from the DTE Energy PAC
- c. A list of corporate political contributions made to Super PACs, Ballot Question Committees, and 527 organizations that are required by law to disclose their contributions
- d. A list of trade associations and chambers of commerce, the aggregate amount of dues, and the portion of dues utilized for political activities by organizations receiving \$50,000 or more annually
- e. DTE Energy will make available on its website an online archive of this information for the prior year and additional preceding four year period. Information will be updated effective June 30 and December 31 of each year and posted on a publicly available DTE internet site within 10 working days

3. DTE Energy reserves the right to keep confidential proprietary or competitively sensitive information consistent with required disclosures.

#### F. Responsibility

1. The Public Policy and Responsibility Committee of DTE's Board of Directors will review and approve an annual budget for corporate political contributions that meet the criteria of Corporate Policy OP-10.
2. The Vice President, Corporate & Government Affairs is responsible for approving all Political Action Committee (PAC) contributions, and corporate political contributions up to \$50,000. Contributions that exceed \$50,000 must be approved by the Chief Administrative Officer and the Chief Financial Officer, both who report directly to the Chief Executive Officer.
3. An internal steering committee will review approved corporate political contributions on a quarterly basis and receive an update on the annual budget. The committee includes representatives from business units outside of Corporate and Government Affairs.
4. The Ethics and Compliance Office, which reports to the Chief Legal Officer, conducts an annual review of policies and procedures to ensure PAC and corporate political contributions are made in accordance with the law and company policies. Additionally, the company facilitates employee compliance with our policies and procedures regarding political participation through an annual training and employee acknowledgments.
5. The Corporate & Government Affairs department is responsible for maintaining records of PAC contributions for 7 years and for compliance involving reporting and disclosure of political contributions and involvement.

### **3. Sources**

- A. DTE Energy Way Reference.
- B. DTE Energy Corporate Political Participation Internet Web Site

### **4. Accountable Officer:** Vice President, Corporate and Government Affairs

Last Reviewed: March 18, 2021