



DTE Energy®

DTE ENERGY WAY

CODE OF CONDUCT





Our Purpose

*We serve with our energy, the lifblood of communities
and the engine of progress*



DTE Energy[®]

TABLE OF CONTENTS

A Message from Our Chairman	ii
Our Values	A
Our Commitment	B
• What's the <i>DTE Energy Way</i> ?	B1
• Expectations	B1
• Boundaries You Should Not Cross	B3
• Asking Questions or Reporting Concerns	B3
• Non-Retaliation	B4
Our Workplace	C
• Health and Safety on the Job	C1
• Public Safety	C3
• Fitness for Duty	C3
• Workplace Violence	C4
• Diversity	C5
• Nondiscrimination and Equal Opportunity	C6
• Harassment	C6
• Investigations	C7
• Employee Privacy	C8
Our Company	D
• Keeping Records Right	D1
• Understanding Conflicts of Interest	D2
• Proper Use of Assets	D5
• Intellectual Property and Proprietary Information	D5
• Government and Compliance	D7
Our Community	E
• Customers	E1
• Environment	E2
• Corporate Citizenship	E3
• Suppliers/Vendors (including Entertainment, Gifts and Gratuities)	E5
Our Market	F
• Insider Trading	F1
• Fair Competition	F2
• External Communications (including Social Media)	F3
Our Resources	G

A MESSAGE FROM OUR CHAIRMAN



"We're all part of a winning team...a team that's making progress toward becoming the best-operated energy company in North America and a force for growth and prosperity in the communities where we live and serve."

As we seek to achieve our aspiration, we find guidance in a set of values and standards that apply to everyone at all levels across DTE Energy. The *DTE Energy Way*, our company's code of conduct, describes the behaviors we aspire to. It guides how we behave on the job and helps us resolve issues in line with our values. It helps us know what's in bounds and what's out of bounds.

The *DTE Energy Way* doesn't address every situation, rule or policy. And it's not a substitute for good judgment or talking with your leader. It is, however, a guide to promote dialogue with co-workers and leaders and a place to find the appropriate policies, tools and other resources to help you do the right thing every day.

In addition, these pages offer guidance about what to do if you have questions or concerns. If you have concerns, I encourage you to report them, without any fear of retaliation.

And so I'm asking you to think of the *DTE Energy Way* as an important resource that will keep us headed in the right direction – toward our aspiration – in the right way. That's why I encourage you to review it and use it as a reference tool.

A handwritten signature in black ink that reads "Gerry Anderson". The signature is written in a cursive, flowing style.

OUR VALUES



OUR VALUES

Our values define what we aspire to stand for and what we aspire to create at DTE Energy. They have a strong connection to tangible business results and shape the way we think about our company and our work on a daily basis. Values are far more than posters on a wall or things that we occasionally refer to or talk about. Our values only have real power if we routinely live them, act on them – and do so with conviction.

We put the health and safety of people first

...and know this responsibility rests with each of us.

We are the lifeblood of communities and the engine of progress. That's why we do what we do each day. But we never forget that for many of our people, this is dangerous work. So in a company like ours with a long history of focusing on safety, we believe diligence is vital. That's why we embrace the principle of 200 percent accountability. "I am 100 percent responsible for my own safety and 100 percent responsible for the safety of those around me – because I care about my own family, my colleagues and their families, and the people in the communities we serve."

This includes the environment – we are dedicated to protecting our employees, neighbors and the environment around us, to make sure we minimize our impact.

Also vitally important is our focus on health. This is an increasingly important issue for us as a company – and as a country. A healthy workforce contributes to stronger – and safer – performance on the job. But it's more than that: the choices we make today – healthy or not – will dictate our quality of life well into the future. They will also determine whether we pass along a financially healthy country to our children and grandchildren.

We act with integrity and show respect

...and understand this defines our company's character.

Integrity is about honesty, ethics and full transparency in the way we approach our business. We are committed to operate with integrity. We are committed to being completely forthright in everything we do.

And as for respect, we believe it's something everyone at DTE Energy deserves – no matter your position. The rule of thumb we live and work by is to show a high level of respect and consideration for our fellow employees, customers, suppliers, contractors and neighbors. To do otherwise is not the "DTE Energy Way."

We are committed to building a work environment in which we treat one another fairly and respect the company's commitment to the diversity of people, experiences and viewpoints.

OUR VALUES

We see our work through the eyes of those we serve

...and know that our work is a powerful means to serve others.

This value brings to mind the Golden Rule: “Do unto others as you would have them do unto you.” We must provide the kind of service that we’d like to receive if we were the customer. This challenges us to look at the ways we’re carrying out our work and ask, “If I could view my work through the eyes of my customers, would I be proud of the way that I’m doing it?”

It’s easy to think this value applies only to employees who work directly with customers. But employees in power plants or gas operations or the corporate center should also ask: “Am I using resources, like my time, in a way that serves our customers well? Would I be proud of my actions and choices if customers were watching me?”

That doesn’t mean we’re not going to have challenging interactions with some of our customers. That’s inevitable. But it does mean that we will do our best to put ourselves in their shoes and see the interaction through their eyes first.

We bring our best energy and focus to our work

...and are fully engaged and accountable for results.

For most of us, our time at DTE Energy is more than just a job. We spend half of our waking hours at work and share a unified purpose: to serve with our energy, the lifeblood of our communities and the engine of progress. The work we do is vitally important to the people, companies and communities that we serve. As a result, how well each of us does our job matters. That’s why we pay so much attention to how we show up on the job – with high accountability, high energy and a strong work ethic. We believe our work deserves our best energy and our best focus.

If we each take personal accountability for our results, we can make a difference for the people around us. This is the right thing to do for our co-workers, customers and shareholders. It is also something we can take pride in.

OUR VALUES



We believe that improvement is our daily responsibility

...and know those we serve have the right to expect that from us.

Our daily focus on Continuous Improvement (CI) will set the stage for operational excellence. We can't just show up and work in our business; we all have a responsibility to work **on** our business – finding new and better ways to get things done and deliver value to our customers and communities. Each of us expects the products and services we buy from other companies to improve over time. Our customers have the right to expect the same from us.

We bring energy and creativity to our innovation and problem-solving efforts. We take pride in recognizing our gaps, learning from our mistakes, and “reserving the right to get smarter” as we get closer to becoming the best-operated energy company in North America. We celebrate our progress along the way, but we never rest on our laurels.

We play to win as a team

...and put the needs of our enterprise first.

Our work is interconnected. That's why we need to work together – respecting our individuality and differences while we pursue a common cause. In a big company like ours, it's easy for us to be siloed and separated as we pursue our individual goals and priorities. Instead, we need to focus on what our customers need. And part of what our customers need is for all of us to be on the same page. We need to be crystal clear about responsibilities, handoffs and interdependencies. We must support each other and have each other's back. It's about collaborating across boundaries to find new and better ways to get things done. Playing to win as a team is an expression of positive energy that strengthens our culture and is an expression of our commitment to put the needs of customers ahead of our individual or departmental goals.

OUR VALUES

We are passionate about the success of our company *...and know that its health and growth generate prosperity.*

Vibrant, healthy and growing companies help our society and economy to thrive. So one of the best things each of us can do for our communities is make sure that our company is healthy and strong.

Each of us hopes that the companies in which we invest our personal savings will produce great returns for us. Our investors – many of whom are individuals like us, saving for their family's future – have the right to expect the same from DTE Energy.

And DTE Energy can only succeed if each of us is accountable for our own actions and behaviors. We can acknowledge the reality of a situation, own it, find solutions and move confidently forward. When we do this, we have a positive influence on our business results, our personal success and the health of the communities we serve.



OUR COMMITMENT

Form 2 - Radiation Protection
Radiological Survey



HWC-75 scfm

Survey No. 20111-R04 Page 1 of 1

Area: GTOC Error Lab	RWP No. YY-1010	Continuous Coverage Status Board Updated: Yes
Purpose: Routine	Date: 8/12/04	Survey Posted: Yes
Survey by (print / sign): Jane Repee / Jane Repee	Time: 1043	Reactor Power: 100 %
		Surveyor's Dose: 0

ED
KED



ing Use Only

OUR COMMITMENT

What's the *DTE Energy Way*?

The *DTE Energy Way*, our highest level policy, is the centerpiece of our commitment to living our values and conducting our business according to the highest ethical standards and in compliance with the law. It highlights the principles that guide our business conduct. The *DTE Energy Way* also provides a common reference point to help you understand what is expected of you. It will always be a good place to start the search for guidance about how to put our values into practice every day.

- It provides practical advice on how to comply with laws and regulations.
- It provides requirements and guidance on how you should relate to colleagues, customers, communities, vendors and government entities.
- It directs you on where to look for other policies and provides useful information sources.
- It can help you resolve difficult questions about business conduct, and it explains how to seek guidance or report a concern.

The *DTE Energy Way* also includes guidance about what actions are “in bounds” and “out of bounds” as well as practical questions and answers about situations that you might encounter on the job. Remember, however, that the *DTE Energy Way* does not provide exhaustive information about every single company policy or every situation in which a question of ethics or compliance may arise. Doing so would be virtually impossible. The company relies on you to exercise good judgment in deciding whether the *DTE Energy Way* covers your issue in sufficient detail to help you make the right decision and act in accordance with our values. If not, then you should seek further guidance from your leader or any of the other sources identified here.

Expectations

Who has to follow the *DTE Energy Way*?

The *DTE Energy Way* applies to all employees, leaders, officers and Board members of DTE Energy and its subsidiaries. Additionally, pursuant to contract terms with DTE Energy, contractors and consultants are expected to act consistently with the *DTE Energy Way* when working on our behalf.

**Note: If there are conflicts between this document and collective bargaining agreements that are in effect for bargaining unit employees, the collective bargaining agreement applies.*

Expectations for All Employees

When we follow the *DTE Energy Way*, we demonstrate our commitment to living our values. As employees, we are responsible for:

- Being familiar with and following the *DTE Energy Way* at all times.
- Seeking help when we have a business conduct, ethics or compliance question that isn't answered here.

Do a Quick “Gut Check”

If you have a question about your conduct that is not answered here, you should ask yourself:

- Is it legal?
- Is it consistent with our core values?
- Am I being fair and honest?
- Would I be unwilling or embarrassed to tell my family, friends or co-workers about my actions?
- Could my actions appear inappropriate?
- How would I feel if my conduct or actions were printed on the front page of the newspaper?
- Could my decision affect my reputation or the company's?

These questions may help you perform an instant “gut check.” If the answers make you uncomfortable, then trust your gut, and seek further guidance before you act.

OUR COMMITMENT

- Complying with all applicable laws and regulations in performing our duties.
- Reporting any conduct that may violate the *DTE Energy Way*.

Failure to comply with the *DTE Energy Way* can result in disciplinary action, up to and including termination of employment.

Q

I think one of my coworkers violated a company policy, but I can't be sure. I am not an expert on the subject. What should I do?

A

You should always speak up if you think misconduct has taken place. You are not responsible for getting enough information to be sure, only for reporting in good faith what you observed.

Expectations for Leaders

Leaders are also responsible for:

- “Casting a positive shadow” – leading by example – modeling our values and living up to these standards at all times.
- Helping team members understand and follow these standards as well as any other policies, practices, requirements or laws that apply to their work.
- Fostering an environment where employees feel comfortable asking questions, seeking guidance and reporting issues.
- Supporting those who raise a concern – and never taking or allowing retaliatory action against someone for reporting a concern or suspected violation in good faith.



OUR COMMITMENT

Boundaries You Should Not Cross

The company works to attract great people... and we understand the value of keeping employees highly engaged and productive. We also understand that you cannot maintain a healthy culture with a heavy-handed approach to discipline. To that end, the company uses positive discipline to address behavior that does not meet our standards. Our goal is to help employees understand the expectations we have around behavior in the workplace. Your knowledge of those expectations takes the guesswork out of keeping individual practices in sync with company values. That said, there are certain boundaries that we just cannot cross. The violations listed below are examples (not an all-inclusive list) of boundaries that can't be crossed. The company will hold employees strictly accountable for crossing these lines, and violations of this type will likely result in termination, even on a first offense.

- Creating, displaying, or using hate group words or symbols on company business or company property
- Unauthorized possession of firearms or other weapons on company business or company property
- Physical assaults
- Willful safety violations
- Possession, sale, use, manufacture or distribution of illegal drugs on company business or company property
- Being involved in an occupational accident or unsafe work act while unfit for duty, including vehicle accidents while driving a company vehicle, either on or off duty
- Theft of company, employee or customer property, including theft of company funds through falsifying pay or business expense records
- Being absent from work without reporting in for three consecutive days
- Willfully, materially misstating financial information

Asking Questions or Reporting Concerns

We hope the *DTE Energy Way* and supporting policies are easy to understand, but we recognize that there may be times when an employee has additional questions about the information provided. Likewise, while we hope the occasions are few, there may also be times when an employee wishes to raise a concern about a potential violation of our policies.

In either situation, and based on your comfort level, talking to your leader is usually a good first step. Being open, honest and direct is often the most effective and efficient way to resolve questions and possible problems. However, if you are uncomfortable asking questions or discussing the matter with your leader, or if your concern involves your leader, there are other avenues for you. These include:

- Your next level leader
- Employee Relations, Human Resources **313.235.8943**

OUR COMMITMENT

- Ethics and Compliance Office **313.235.4777**
- Ethics-in-Action Helpline **877.406.9448** (www.ethicsinaction.dteenergy.com)

These avenues will treat questions or concerns confidentially and share the information only as needed to thoroughly and promptly investigate all reports.

Q

I'm concerned that if I file a report about my co-worker's misconduct, they will know that it's me and our work relationship will be difficult. What should I do?

A

First, investigations of employee concerns are done confidentially and shared with others only if they need to know. However, the Ethics-in-Action Helpline gives you the additional option of asking a question or reporting misconduct anonymously if that is a better option for you.

Non-Retaliation

Q

What if I'm worried about retaliation?

A

Retaliation is not tolerated.

If you, in good faith, raise a concern or report misconduct - rest assured you are doing the right thing. DTE Energy will not tolerate retaliation against any employee who, in good faith, brings forward a compliance or ethical issue.

The company takes claims of retaliation seriously. We'll investigate allegations of retaliation and will take proper action. Anyone found responsible for retaliation against an employee who reports suspected misconduct or other risks to the business is subject to disciplinary action, up to and including termination of employment.

If you suspect that you or someone you know has been retaliated against for raising a compliance or ethical issue, contact your supervisor, Employee Relations, the Ethics and Compliance Office or call/login to the Ethics-in-Action Helpline.

POLICY

- *Zero Tolerance Memo*

OUR WORKPLACE



OUR WORKPLACE

At DTE Energy, we want a workplace where the health and safety of our employees is a top priority and each employee feels valued for their ideas and perspectives. Working together as a team – embracing our unique differences in thinking, background, talent and life experience – gives us the greatest opportunity for success in serving each other, our customers and the community.

Health and Safety on the Job

At DTE Energy, we embrace the principle of 200 percent accountability: “I am 100 percent responsible for my own safety and 100 percent responsible for the safety of those around me, including the public and our customers.”

Ensuring a safe work environment means knowing the rules and following them. This includes the simple ones, like always wearing your seat belt or using handrails when taking the stairs. And the not-so-simple rules, too. There is no task that is so urgent that we cannot invest the time and energy to perform it safely.

Our commitment to 200 percent accountability includes things like:

- Having the courage to speak up to remind other employees and visitors of our health and safety practices when necessary.
- Saying something to leaders when we identify procedures that aren't consistent with our health and safety value.
- Reporting all near-misses and accidents so we can determine the root cause and learn how to avoid recurrences.



Living our safety value also requires vigilance. If you know of an unsafe condition – or even the potential for an unsafe condition – immediately contact your supervisor. If you have previously reported an unsafe condition, and it has gone uncorrected, contact Corporate Safety.

As part of our commitment to health and safety, DTE Energy cooperates with government reviews of our company facilities and operations and has procedures in place to guide employees and leaders with these reviews. If you are contacted by a government regulatory official, ask contact information and the purpose of the call or visit. Let the person know you will have a representative of the appropriate area of the company follow up.

One more thing: our commitment to safety includes complying with all applicable health and safety regulations. We simply cannot tolerate willful violations of safety regulations, policies or procedures.

OUR WORKPLACE

We put the health and safety of people first ...and know this responsibility rests with each of us.

What's in bounds?

- Following all safety policies and procedures regarding tools, equipment and working environments.
- Using all personal protective equipment (PPE) as required for the work.
- Following all laws and company standards regarding vehicle operation and traffic safety.
- Ensuring that we keep our safety training up-to-date.

What's out of bounds?

- Taking shortcuts without consideration for safety procedures and precautions.
- Being distracted by personal issues, and letting safety slip.
- Not reporting a hazard.



POLICIES

- *EM2 Health and Safety*
- *EM5-3 Protective Tagging System*
- *EM12 Using Vehicles or Equipment on Company Business*

Q

I was injured at work, but don't want to report it because of how it will affect our group's safety goal. What should I do?

A

Report injuries to your supervisor immediately and get medical treatment, if required. Each of us is responsible for reporting workplace injuries. The group's desire to achieve the safety goal should not prevent any employee from reporting a workplace injury, and supervisors must never encourage employees to cover up a safety incident. Reporting an injury could prevent others from experiencing a similar injury.

OUR WORKPLACE

Public Safety

We are committed to operating our businesses in a manner that keeps communities safe. We're also committed to educating our neighbors so they can recognize potential dangers associated with our products and equipment.

We bring our best energy and focus to our work ...and are fully engaged and accountable for results.

What's in bounds?	What's out of bounds?
<ul style="list-style-type: none">• Correcting unsafe conditions immediately upon discovery.• Standing by down wires to protect the public.• Reporting public safety incidents, such as an injury to a member of the public, equipment damage or an emergency that might endanger lives or interrupt service.• Demonstrating our customer commitment by performing Storm or Public Safety jobs promptly and being fully prepared when activated.	<ul style="list-style-type: none">• Letting emergency response training lapse.• Reporting for emergency response duty unprepared.• Knowingly and willfully providing false or misleading information to the public and media.

Fitness for Duty

DTE Energy is committed to protecting the health and safety of its employees and the public. In order to provide a safe working environment, employees must be able to perform their job duties in a safe, secure, productive and effective manner. Employees who are not fit for duty may present a safety hazard to themselves or others. You are always expected to report to work fit for duty, and to remain fit while on duty. This means:

- You may not use, possess, sell, distribute or be under the influence of illegal drugs on company property or while conducting DTE Energy business, whether on or off company property.
- You may not use, possess, sell, distribute or be under the influence of alcohol while conducting DTE Energy business or while on company property. You also must comply with specific alcohol and drug standards and any other fitness-for-duty regulations that apply to your job, such as those required by the Nuclear Regulatory Commission or the Department of Transportation.
- Where company business is conducted in conjunction with an after-hours social function, alcohol consumption in moderation is permissible as long as it is limited and does not violate other legal requirements. Alcoholic beverages may be served on company property at after-hours company events with approval from an appropriate sponsoring Vice President.

OUR WORKPLACE



Drug and alcohol testing is required for employees involved in a work-related accident, employees who exhibit signs of substance abuse or aberrant behavior, and employees who are involved in an incident resulting in damage to company property. Random or periodic testing related to drug and alcohol program requirements is needed for some specific jobs.

POLICIES

- *EM3 Fitness for Duty*
- *EM3-1 Fitness for Duty – Nuclear Generation*

What's in bounds?

- Notifying Disability Case with Claims or designated medical personnel if you're taking prescription drugs or over-the-counter medications that you reasonably believe could affect your ability to work safely or efficiently.
- Knowing and following fitness-for-duty guidelines.

What's out of bounds?

- Using, possessing, selling, offering to sell, providing, sharing or purchasing illegal drugs while on duty or on company property.
- Reporting to work unfit for duty as a result of on or off-the-job use of any medication, illegal drug or alcohol.

Workplace Violence

There's just no place for it at DTE Energy.

To help ensure a safe and secure workplace, the company reserves the right to search persons, parcels, vehicles and any company property at any time – including property located off-premises.

Corporate Security will respond to and investigate reports of workplace violence. Criminal prosecution will be pursued, where appropriate.

The use or possession of weapons or explosives anywhere on company property, in company vehicles, or while conducting company business is strictly prohibited, even if you have a permit or license to carry them. Only the Chief Security Officer can authorize exceptions.

OUR WORKPLACE

What's in bounds?	What's out of bounds?
<ul style="list-style-type: none">• Reporting any potential or actual physical threat or harm to yourself or others.	<ul style="list-style-type: none">• Threatening or referencing physical harm or violence - even if you feel you have a good reason to be angry. And even if you claim later you "weren't really serious" about following through on your threat.• Using tools, supplies or anything else in a manner that implies it is a weapon.• Shoving, punching or other hostile physical contact.

POLICY

- *OP8 Physically Protecting People, Property and Operations*

Report any concerns about security in the workplace to Corporate Security at **313.235.9113**.

Diversity

Our commitment to respect each other and create an inclusive environment goes beyond just race and gender to appreciating and valuing each other and our diverse backgrounds and life experiences. We believe that a diverse work force with a healthy mix of educational experiences, backgrounds, ages, cultures, religions and personal interests expands our base of knowledge, skills and cross-cultural understanding. This, in turn, helps us better connect with our customers. And that makes us a better company.

What's in bounds?	What's out of bounds?
<ul style="list-style-type: none">• Seeking to understand and include others, regardless of differences.• Collaborating as a member of a diverse team and seeking out diversity of thought.• Supporting programs and initiatives to further our commitment to diversity.	<ul style="list-style-type: none">• Disregarding different perspectives.• Discouraging others from offering their opinion.

**We play to win
as a team**
...and put the needs of
our enterprise first.

OUR WORKPLACE

POLICIES

- *EM7 Hiring, Movement and Separation of Employees*
- *EM7-3 Recruitment, Hiring and Job Changes*

Nondiscrimination and Equal Opportunity

DTE Energy is committed to having a workplace that promotes equal opportunity and is free of discrimination – not only because it is required by law, but also because it is core to our value of acting with integrity and showing respect – a value that defines our company’s character.

It is the policy of DTE Energy to provide equal employment opportunity to all individuals and to prohibit discrimination on the basis of race, color, sex, sexual orientation, gender identity, age, religion, disability, national origin, citizenship, height, weight, genetic information, marital status, pregnancy, protected veteran status or any other status protected by law. The company makes reasonable accommodations to promote the employment and advancement of qualified individuals with disabilities and disabled veterans, unless such accommodations would impose an undue hardship on the company’s business. The company also has Affirmative Action Programs to promote the employment and advancement of minorities, women, persons with disabilities, and protected veterans. The company’s EEO and Affirmative Action Policies apply to all employment actions including, but not limited to, recruitment, hiring, promotion, and separation.

Q

One of my employees came to me complaining of discrimination by a co-worker, but I’m unsure if discrimination is really occurring. What should I do?

A

As a leader of the company, you need to bring this issue to Employee Relations in Human Resources. It is not your role to determine the validity of a discrimination complaint.

Examples of conduct that may create a hostile working environment include:

- Inappropriate touching
- Derogatory comments, name-calling or continual taunting based on a protected group.
- Conduct that is physically threatening, harmful or humiliating.
- Taking advantage of employees with physical or mental disabilities, such as encouraging inappropriate behavior.
- Offensive jokes, drawings, photographs, etc., especially if based on a protected category.

Harassment

Harassment based on race, color, sex, sexual orientation, gender identity, age, religion, disability, national origin, citizenship, height, weight, genetic information, marital status, pregnancy, protected veteran status or any other status protected by law is also discriminatory. Conduct that creates an abusive or hostile working environment is also prohibited by the company. Respect is one of our core values, and harassment simply has no place here.

Sexual harassment is misconduct that deprives employees of a workplace free from unwanted and unwelcome sexual overtones. Sexual harassment may include unwelcome sexual advances, requests for sexual favors, or other verbal or physical contact of a sexual nature. Such conduct can create an offensive, hostile and intimidating working environment, and prevents individuals from effectively performing the duties of their position.

Sometimes an action that is not intended to be discriminatory or harassing can nevertheless be viewed or perceived by the other person, employee or guest in a different way and thereby becomes a problem. The best rule of conduct is simple: *“Treat everyone the same way you expect and want to be treated.”*

OUR WORKPLACE

Respect is one of our core values, and harassment *and discriminatory conduct toward fellow employees, customers, or others encountered while on the job is prohibited and* simply has no place here.

We act with integrity
and show respect
...and understand
this defines our
company's character.

What's in bounds?

- Recruiting, selecting and compensating based on merit, experience and work-related criteria.
- Treating others with respect and dignity any time and any place you represent the company.
- Thinking carefully before making off-hand jokes that may unintentionally offend others.
- Reporting any perceived bias based on differences protected by law or company policy.

What's out of bounds?

- Unwanted physical contact (e.g., a "friendly" neck massage).
- Offensive comments about an individual's appearance, ethnicity or sexual orientation.
- Inappropriate, sexually explicit or offensive jokes (even if you think you are just emailing them among friends).
- Possessing, displaying or distributing offensive materials, such as cartoons, pictures, graffiti, paraphernalia or pornographic materials.

Investigations

DTE Energy investigates all reported allegations of harassment, discrimination or retaliation. We expect individuals involved in these investigations to provide their full cooperation. The company maintains confidentiality throughout the investigation process to the extent possible and consistent with the company's need to responsibly address these types of allegations and take corrective action.

The company prohibits retaliation against any individual who, in good faith, reports discrimination or harassment, or any individual who participates in, or otherwise supports, an investigation of such reports. Anyone who exhibits retaliatory behavior against an individual under such circumstances will be subject to disciplinary action up to and including termination.



OUR WORKPLACE

POLICIES

- *EM22 Background Checks*
- *GV11 Confidentiality and Privacy of Information Used for Company Purposes*
- *OP3 Information Security*
- *OP8 Physically Protecting People, Property and Operations*

Employee Privacy

Personal Information

The company collects and retains personal employee information as needed to support functions such as benefits, compensation and payroll. The company is committed to protecting private personal information and using it only for legitimate business purposes. Access to records containing personal information is limited to personnel who have appropriate authorization and a clear business need for that information. If you have access to personal information, you must treat it appropriately.

Use of Company Communications Systems and Property

When it comes to use of company resources for personal communications, we must balance employee privacy with the need to maintain a safe and efficient work environment. For that reason, the company reserves the right to lawfully monitor its assets and work environments.

This means that even though limited personal use of company electronic information and communications systems is permitted, we should not assume that use of a company computer or other communications in the workplace – such as telephone calls, voicemail, email, mobile devices, instant messaging or Internet use – will be private.

This also means that the company retains the right to lawfully search any company property at any time (e.g., offices, desks, lockers, vehicles) including company property located off-premises. The company also retains the right to search persons, parcels and vehicles on company property.

DTE Energy is not typically concerned with conduct off the job, unless it impairs an employee's performance on the job, or affects the reputation or business interests of the company.

Q

If I am allowed to send personal email from my company computer, why would the company invade my privacy and look at it?

A

We don't read an employee's email without reason; however, the company can and does monitor for inappropriate use (e.g., sending hate mail or pornography) or to investigate misconduct. For that reason, you should not have an expectation of privacy. If you need to send a personal email that you really want to keep private, it's best to send it from home or by using a personal device.

OUR COMPANY



OUR COMPANY

For our company to be successful, we all need to do our part. We can start by being accountable for our actions – from keeping accurate records to avoiding conflicts of interest, to protecting private information and assets. Some of this accountability may seem like minor details – while other issues seem significant. Whether big or small, all of it is important to our success.

Keeping Records Right

Keeping complete, accurate and honest company records is serious business. Failing to keep good records may result in fines and penalties and even damage our business and reputation.

We define company records as all data and knowledge purchased, produced, acquired, reported or otherwise used by the company. These records might be in computer files, on paper or on other media. Some examples include:

- Reports
- Timesheets
- Invoices
- Payroll and service records
- Customer records
- Proprietary data or confidential information
- Nuclear safeguards information
- Engineering design documents
- Measurement or performance records
- Other essential data

We are passionate about the success of our company ...and know that its health and growth generate prosperity.

POLICIES

- *FC3 Business Expense and Reimbursement*
- *GV11 Confidentiality and Privacy of Information Used for Company Purposes*
- *OP6 Corporate Records Retention*

What's in bounds?

- Being honest and careful in keeping accurate records.
- Promptly correcting errors.
- Protecting company information and keeping it confidential.
- Complying with legal, company and accounting requirements for affiliate transactions.
- Following the record retention schedule for your organization.

What's out of bounds?

- Changing or destroying records without proper authorization.
- Thinking accurate record keeping is a low priority.
- Willfully, materially misstating financial information.
- Approving your own expenses; including having a subordinate put your expenses on their expense report for your approval.

OUR COMPANY

Q

When I complete a project, can I throw out all the documentation?

A

First check the company's record retention schedule. Retention guidelines differ depending on the record type, and there could be a legal reason to hang on to the documentation. Contact Records & Information Management for assistance at recordsmgmt@dteenergy.com.

Understanding Conflicts of Interest

What's a conflict of interest? It's when your private interests interfere...*or even appear to interfere*...with the interests of the company as a whole. A conflict of interest occurs when you have difficulty performing your work objectively and effectively due to the influence of your personal interests. This could happen in your personal interests or relationships, outside activities, or financial transactions.

POLICY

- *EM18 Personal Relationships*

Personal Relationships

Sometimes our personal relationships can lead to a conflict of interest when those close to us become involved, directly or indirectly, in our work responsibilities. That's why we can't have family members or personal friends reporting to each other where one has influence over work assignments, performance evaluations, compensation or hiring decisions of the other. This also extends to family members or personal friends that have outside businesses or who conduct transactions with the company. If you find yourself in any of these situations, you should immediately disclose this to Human Resources to ensure that any potential conflict of interest can be avoided.

Q

Your brother is part owner of a firm that does work with DTE Energy in an area where you have some oversight responsibilities. Is this a conflict of interest?

A

Yes, because a conflict of interest may exist not only due to your work responsibilities, but also from the interests of your family members. Remember, appearances do matter.

We act with integrity
and show respect
...and understand this
defines our
company's character.

OUR COMPANY



Outside Activities

Being involved in activities or organizations outside of work (e.g., local public office or non-profit organization) is a good way to energize our lives. However, some situations could create a potential conflict of interest. And that is why we should avoid conversations or interactions with external parties that could be perceived as providing preferential treatment or a personal benefit. It is always wise to check with a leader first.

Financial Interests

DTE Energy's business cannot be bought. Likewise, acting with integrity means that we do not buy others' business. This is why we should never offer or accept personal loans or other guarantees, preferences or discounts that are not widely offered to others for business. Not only could this be illegal, but it also is a conflict of interest. Additionally, we should never use company funds to make political contributions or support political organizations except where permitted by law and supported by company policy.

How to handle questions or concerns

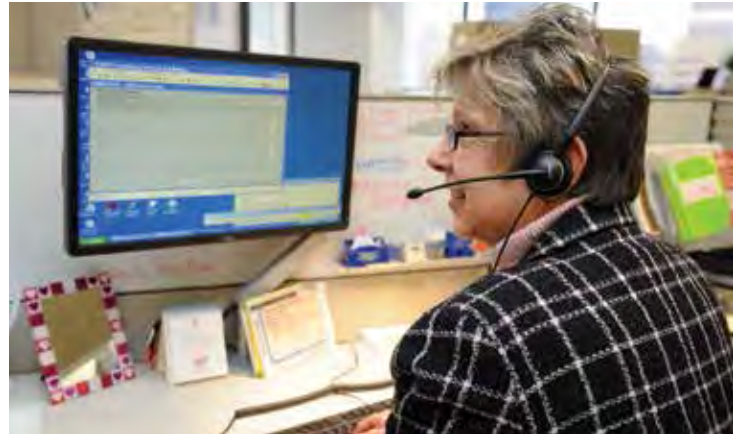
If you believe you might have a conflict of interest, notify your leader. Your leader will be able to provide you guidance on your situation or suggest appropriate steps, which may include completing a conflict of interest disclosure form, contacting the Ethics and Compliance Office directly, or the Ethics-in-Action Helpline at **877.406.9448**.

Depending on your question, you may also wish to review the policies on page D4.

Hold Public Office?

If you hold a public office, either elected or appointed, it may be appropriate to be involved in discussions that relate to DTE Energy or its competitors because of your expertise. But it is not appropriate to participate in the voting or decision-making processes. When these situations happen, you should disclose the potential conflict and remove yourself from any decisions or agreements.

OUR COMPANY



POLICIES

- *EM7 Hiring, Movement and Separation of Employees*
- *FC3 Business Expense and Reimbursement*
- *GV5 Officer Code of Business Conduct and Ethics*
- *GV14 Segregation of Duties*

What's in bounds?

- Receiving approval from your leader before serving as a director, manager or member of a board or committee of any business where there may appear to be a conflict of interest.
- Separating your personal and company interests to eliminate the appearance of or an actual conflict of interest.
- Owning or investing in a business that is not a competitor, supplier or other business partner to DTE Energy.
- Using company information only for its intended business use.
- Disclosing to Human Resources that you supervise or report to a person with whom you have a close personal relationship.

What's out of bounds?

- Involving yourself, directly or indirectly, with a company transaction or account that involves someone with whom you have a close personal relationship.
- Misrepresenting yourself as a DTE Energy employee when performing outside work.
- Using company resources for outside activities without appropriate leader approval.
- Soliciting personal business on company time or using company resources for personal business.
- Giving or receiving cash or cash equivalents in any amount from suppliers or customers.

Q

Is this situation a problem? Alex, a field tech, advises a customer that the gas will need to be shut off at her home and equipment repaired. Alex then gives the customer a business card for his brother, who is a contractor, and suggests the customer call him to arrange the repair.

A

Yes. This demonstrates a conflict of interest because Alex is inappropriately soliciting business from a DTE Energy customer for the personal gain of his brother.

OUR COMPANY

Proper Use of Assets

We all play an important role in managing the company's assets. The protection and proper use of company resources helps keep costs in line, which helps keep rates affordable for customers and improves shareholder value. Company assets include things like computer resources, money, time, inventory, facilities, equipment and tools.

DTE Energy empowers employees with the authority to use company resources necessary to perform their jobs (in accordance with company policies).

What's in bounds?

- Spending company money only when authorized and for legitimate business needs.
- Using work time productively and being on the job when scheduled.
- Taking care of company property and only disposing of it when authorized and in accordance with procedures.
- Asking your leader for approval to use company assets for personal or outside activities in accordance with established practices.

What's out of bounds?

- Theft of company, employee or customer property, including theft of scrap or salvage materials.
- Theft of company funds through falsifying pay or business expense records.
- Operating a personal business with company resources.
- Connecting an unsecure thumb drive or other storage device to the company's network.

If you have questions or concerns, talk to your leader or ask a question through the Ethics-in-Action Helpline at **877.406.9448**.

Intellectual Property and Proprietary Information

To continuously improve, we need to be creative in developing new ideas and products. And we need to protect these ideas so we don't risk losing the advantages associated with our intellectual property and proprietary information.

Like intellectual property, proprietary information plays a key role in our business, so it is important to protect it from unauthorized disclosure or use. Proprietary information is owned or controlled by DTE Energy and provides economic value; however, it also has value to our competitors and other third parties, and if inappropriately released, it could have a negative impact on us. Some examples of proprietary information include customer and employee information, business and marketing plans, financial and operating data, and planned outage schedules.

POLICIES

- *GV6 Signature Authority for Contracts and Financial Transactions*
- *GV11 Confidentiality and Privacy of Information Used for Company Purposes*
- *OP3 Information Security*
- *OP8 Physically Protecting People, Property and Operations*

Inventions or Other Creative Works

Advise your leader of any inventions or other creative works developed in your job, so we can obtain proper legal protection for DTE Energy's property. Some examples of intellectual property we want to protect from disclosure are unpatented technology, trade secrets, trademarks, technology, artwork, and other forms of graphics.

OUR COMPANY

We believe that improvement is our daily responsibility ...and know those we serve have the right to expect that from us.

What's in bounds?

- Obtaining confidentiality and non-disclosure agreements from potential suppliers, consultants, etc. where appropriate.
- Advising your leader of intellectual property developed while working for the company.
- Respecting the intellectual property and proprietary information rights of others, including our suppliers and competitors.

What's out of bounds?

- Distributing intellectual property or proprietary information to third parties without proper authorization.
- Using intellectual property or proprietary information for nonbusiness related matters, or without proper authorization.
- Copying, distributing or modifying third-party copyrighted materials, documents or computer programs without permission.
- Taking intellectual property or proprietary information with you if you leave the company.

Q

I often give presentations at conferences sponsored by professional organizations to which I belong. Should I be concerned about proprietary information? How should I approach this?

A

You should be sensitive about DTE Energy information you plan to share. Review it with your leader and also check to see if Corporate Communications wants to review the presentation. While knowledge sharing is encouraged, if the information is confidential, or if it could be used by others in securing a business advantage over DTE Energy, the information should not be shared.



OUR COMPANY

Q

I have a personal social media site that I use to blog about things happening in the community, of which DTE Energy is a part. I want to display our company logo on my site. Is the use of the logo permitted?

A

Yes, as long as all copyright and other intellectual property laws are respected. For DTE's protection as well as your own, it is critical that you show proper respect for the laws governing copyright, trademarks, including DTE's own copyrights, trademarks and brands."

POLICIES

- *OP6 Corporate Records Retention*
- *OP7 Patents*
- *OP24 Miscellaneous Product or Service Offerings*

Government and Compliance

We value our relationships with government and regulatory personnel and recognize they are important to our continued success. To sustain and continue to build upon these relationships, it's critical that we avoid the appearance of any impropriety when dealing with government or regulatory agencies, officials or employees. If we don't, both parties could be subject to fines and penalties, and our good reputation will be tarnished.

In addition, as DTE Energy employees, we all must commit to complying with relevant laws, rules and regulations. To do so, it's helpful to understand both "why" we're doing something and "how" to do it. Getting clear on both the "why" and "how" helps us understand the particular requirements of the laws and regulations that we must fulfill as part of doing business. When we're in compliance, the community, our customers and our shareholders can feel confident that they are involved with a company that demonstrates integrity and compliance with laws, rules and regulations in everything we do.

What's in bounds?

- Testifying in a legal or regulatory proceeding truthfully and based on facts.
- Complying with all federal, state and local laws and regulations.
- Cooperating with government and regulatory officials in reviews of company facilities or operations.

What's out of bounds?

- Giving government employees, public officials or members of their immediate families, gifts, bribes, or any preferential treatment for business transactions or policy decisions.
- Failing to report a potential incident or activity that does not comply with an applicable law or regulation.
- Misrepresenting facts or data on government or regulatory reports.

OUR COMPANY

If you are approached or contacted by a government or regulatory official, ask for contact information and the purpose of the call or visit. Let the person know you'll have a representative of the appropriate area of the company follow up. There are a number of departments that are key in assisting with these issues. Please reach out to one of the following groups as soon as you are approached or contacted.

- Regulatory Affairs
- Corporate and Government Affairs
- Legal
- Ethics and Compliance Office
- Corporate Safety
- Environmental Management & Resources

OUR COMMUNITY



OUR COMMUNITY

DTE Energy is proud to serve a highly diverse community throughout our service territory and across the country through our non-utility businesses. We want to be a force for growth and prosperity everywhere we operate.

Customers

Every employee has a role to play as an ambassador to our customers. Challenge yourself and ask, “If I could view my work from the customer’s perspective, would I be proud of the way that I’m doing it?” As we provide many essential services to customers, we have a responsibility not only to deliver those services reliably and efficiently, but also to deliver them in a way that demonstrates our commitment to excellence. Inevitably, we’ll have tough interactions with some of our customers, which will put us to the test. And that’s when it’s most important to put ourselves in their shoes and see the interaction through their eyes.

We see our work through the eyes of those we serve ...and know that our work is a powerful means to serve others.

What’s in bounds?

- Interacting with customers in an engaging and respectful manner.
- Using “I Can Help!” to assist customers whose concerns with our company have not been resolved through our Customer Service Line, **800.477.4747**, or our website (**dteenergy.com**).
- Using resources, like time, in a way that would make customers proud.
- Respecting and maintaining customers’ privacy and trust.

What’s out of bounds?

- Missing appointments or deliverables with customers.
- Being dishonest in any way in customer interactions.
- Accessing or disclosing confidential customer information without an authorized business or emergency purpose for doing so.
- Failing to protect the security of our customer information systems.



OUR COMMUNITY

Q

Can I delay a shutoff notice for a family friend, who asked me for help?

A

No. But you can empathize and tell your friend that while you can't promise anything, you can file an "I Can Help!" eform. The "I Can Help!" team, working with the Customer Service Advocacy group, may be able to help.



Environment

We are committed to minimizing our impact on the environment, developing cleaner ways to produce energy, helping our customers use energy more efficiently, and partnering with educational and business institutions to enhance the environment for plants, animals and people. This commitment to environmental stewardship includes operating our facilities and equipment in a manner that complies with government standards and protects our employees and surrounding communities.

POLICY

- *Environmental Program Guidelines*

What's in bounds?

- Reporting incidents that may create a threat to the environment.
- Cooperating with government and regulatory officials regarding environmental inquiries or inspections, and notifying the environmental group, Legal, or a local employee authorized to deal with these matters.
- Identifying and weighing environmental risks when making decisions.

What's out of bounds?

- Not reporting a potentially hazardous spill since you cleaned it up yourself.
- Ignoring environmental procedures when using equipment or performing business operations.
- Misrepresenting the occurrence or severity of an environmental incident.

OUR COMMUNITY

Q I am running a project that involves the temporary use of a generator and mobile fuel tank. The contractors performing the work will bring all their own materials and dispose of all the waste generated. Do I have any environmental responsibilities?

A Yes. Work with your environmental representative as you plan your project and remind the contractors they must follow environmental policies and procedures. There are a number of issues to address; for example, a generator may impact an existing air permit, and fuel tanks must meet environmental and safety standards.

Q My work is always 100 percent compliant with all environmental regulations and permits. What other environmental expectations should I be aware of?

A While compliance with regulations and specific permits is our first priority, DTE is committed to going beyond compliance where practical. There may be additional specifications related to special environmental designations (ISO 14001 certifications for example). And you should always look for opportunities to be environmentally friendly, such as reducing energy or water use and increasing recycling.

Corporate Citizenship

At DTE Energy, we are part of the communities in which we live and serve. That's one reason we work hard to be a good corporate citizen, which includes charitable and political contributions and community involvement.

Charitable Contributions

The DTE Energy Foundation and Corporate Contributions manage corporate charitable contributions. Organizations should follow company policy and procedures for requesting or making corporate charitable contributions, including in-kind services. If you have questions about donating company resources, or would like to make or request a charitable contribution, contact Corporate Contributions in Public Affairs.

OUR COMMUNITY

OUR COMPANY. OUR FUTURE.

POLITICAL ACTION COMMITTEE

Your choice to participate (or not) in one of our PACs will have no impact on the terms and conditions of your employment here.

Political Contributions

We hope that our employees take an active interest in the political process. We are all free to make personal contributions to candidates or political organizations and to participate in legal activities that reflect our individual choices. DTE Energy administers political action committees (PACs) that accept voluntary contributions from employees who wish to participate in the political process in a way that supports DTE Energy.

Community Involvement

DTE Energy employees are active community volunteers and work to address a wide range of community needs. If you participate in volunteer activities, it is expected that you do so on your own time unless given approval by your leader to do otherwise.

What's in bounds?

- Using a volunteer opportunity as a group team building activity with leader approval.
- Approaching Corporate Contributions to request a corporate charitable contribution to a non-profit whose mission is consistent with company community involvement priorities.
- Making sure any cash or non-cash company donation is properly authorized before promising it to a charity.

What's out of bounds?

- Conducting volunteer activities during business hours, unless given approval by your leader.
- Donating company funds to any political party, candidate or campaign without authorization.
- Using company funds, time, equipment, supplies or facilities when making personal political contributions.
- Speaking as a designated official of DTE Energy on political, public or regulatory matters without authorization to do so.

POLICY

- *OP10 Corporate Political Participation*



OUR COMMUNITY

Suppliers and Vendors

Giving and receiving entertainment, gifts and gratuities

The exchange of small business courtesies, such as a modest meal, is a common practice that can help to form and build business relationships. But we need to be careful that receiving these small courtesies doesn't sway our decisions, or even give the appearance of swaying our decisions, about what we buy or who our business partners are. Before you accept any entertainment, gifts or gratuities from someone who supplies products or services to DTE Energy, it's a good idea to let them know about our policies to ensure a clear understanding.

The flipside is just as important: We need to steer clear of using entertainment, gifts or gratuities to try to sway the decisions of our customers, suppliers, regulators, business partners or anyone else. In fact, improper gifts may be considered bribery, which violates the law! So before offering any entertainment, gifts or gratuities, it's important to know and abide by customers' and government officials' policies. That demonstrates integrity and keeps us in line with our values.

Accepting Gifts?

We should only accept gifts, entertainment or other gratuities on an infrequent basis. They should be minimal in value (\$75 or less). They can only be accepted in the normal course of an existing business relationship and they can't be meant to improperly influence our decisions.

What's in bounds?

- Seeking guidance from my leader and disclosing the offer or receipt of gifts or entertainment (from our business partners) that may be questionable or not conform to our policy.
- Communicating our policies regarding business courtesies to our suppliers and vendors.
- Giving or receiving infrequent, moderate gifts or hospitality as part of a vendor relationship, including meals, gift baskets, or books. Tickets to charity, sporting, entertainment or cultural events is in bounds only when there is a specific business purpose or for establishing or strengthening business relationships and with leader approval.
- Partnering with suppliers and vendors who exhibit behaviors consistent with our core values and diversity principles.
- Avoiding unnecessary contact with suppliers who are currently involved in the bid process.

What's out of bounds?

- Soliciting any entertainment, gifts or gratuities from anyone with whom we do business.
- Accepting or offering entertainment, gifts or gratuities that could influence, or be perceived to influence, our purchasing or contracting decisions.
- Participating in gambling or sexually explicit entertainment.
- Giving or receiving money, gift cards or other cash equivalents, loans, special privileges, personal favors, benefits, services or any other favor that may be considered a bribe or kickback.

We act with integrity and show respect ...and understand this defines our company's character.

OUR COMMUNITY

POLICIES

- *FC3 Business Expense and Reimbursement*
- *OP4 Procurement to Pay*
- *OP22 Contract Management & Administration*

Q

One of my suppliers has invited me and my team to lunch to discuss product quality issues and their resolution. Who pays for this lunch?

A

It's acceptable for a supplier with whom we have an established business relationship to pay. It would not be acceptable, however, for you to ask the supplier to take you to lunch or to pay.

Q

I have been working with the same vendor for two years. The vendor has invited me to a Red Wings hockey game! They say not to worry because they had the extra ticket. Can I attend?

A

It depends. Check with your leader. You should consider the value of the ticket as well as if the vendor's contract may be coming up for bid soon and the role you play in the selection. If there could be a perceived degree of influence, you should politely decline the invitation.

Questions?

If you are offered or given entertainment, gifts or gratuities you think might be outside the lines, report it to your leader. If it is a gift, politely return it with an explanation that company standards don't permit you to accept it.

If you have questions, contact the Ethics and Compliance Office, the Ethics-in-Action Helpline at **877.406.9448** or Supply Chain Management.

OUR MARKET



OUR MARKET

We all play a part in ensuring our company is healthy and strong. The bottom line is that we compete in the market based upon the merits of our products and services, by maintaining the trust of our shareholders, and by building and protecting our reputation. This includes being honest and responsible when dealing with material non-public information, and using common sense and good judgment when engaging in external company communications. We do these things not only because they are legally required, but because it's the right thing to do.

Insider Trading and Hedging Transactions

Insider Trading

Among many other things, operating with integrity means that we must never use inside information for personal gain. Inside information is material non-public information that could influence an investor's decision to buy, sell or otherwise trade securities of the relevant company.

Federal law and Securities and Exchange Commission (SEC) regulations make it illegal to buy or sell securities on the basis of inside information. Inappropriately using or sharing inside information undermines trust and can lead to criminal prosecution, including prison. Keep inside information inside.

Examples of what could be considered material non-public information include:

- Judicial or regulatory decisions
- Dividend declarations
- Plans to issue or buy back securities
- Earnings announcements
- Pending acquisitions or mergers
- Joint venture and contract negotiations
- Potential DTE Energy transactions with other companies

What's in bounds?

- Protecting company inside information from those that do not have a need to know.
- Adhering to SEC regulations and company policy for buying/selling DTE Energy stock.

What's out of bounds?

- Discussing inside information in public places.
- Using or sharing inside information for personal gain.
- Trading in the securities of DTE Energy when you have material, non-public information that has not yet been released to the public.

Q

Due to my job responsibilities, I often have access to earnings information before it is released. If someone asks me how the numbers look before the SEC filing, is it OK to provide them a general indication of the earnings?

A

No, any type of disclosure of material non-public information including estimates or other types of tipoffs is prohibited. Material non-public information should only be discussed among employees who have a need to know in order to complete their job responsibilities and who understand the insider trading rules.

POLICIES

- *GV5 Officer Code of Business Conduct and Ethics*
- *GV9 Form 8-K Significant Events Reporting*

OUR MARKET

Q

My family and friends sometimes ask me how DTE Energy is doing and if they should buy our stock. I feel the company is doing well and I am proud to work for DTE Energy so I recommend that they buy it. Is this a problem?

A

It is great to be proud of our accomplishments. To avoid any potential problems, it would be best to refer them to the Investors tab on dteenergy.com, where there are presentations and other investor-related materials for their review.

Hedging Transactions

DTE believes that it is important that the interests of our directors, officers and employees always be aligned with the interests of our shareholders. For this reason, DTE considers it inappropriate for any director, officer or employee to engage in any hedging or monetization transaction involving DTE securities that has the effect of limiting or eliminating the full risks and rewards of ownership of DTE securities. These hedging and monetization transactions are therefore prohibited.

How to Handle Questions or Concerns

Talk to your leader, the Corporate Secretary's Office or the Ethics and Compliance Office if you are unsure whether something qualifies as inside information or hedging.

Fair Competition

Not all of our business takes place in regulated utility markets. We also offer some of our products and services in competitive marketplaces. Regardless of the marketplace, our competitive strategies and activities are governed by federal and state laws, rules, policies and regulations.



OUR MARKET

It is common practice, and completely proper, to do benchmarking about the marketplace in which we compete, including information about our competitors' products and services. In doing this, however, we never cheat or attempt to acquire a competitor's trade secrets or other proprietary information through unlawful means, including theft, spying, misrepresentation, omission or a breach of a competitor's non-disclosure agreement by a customer or other party.

Consistent with our commitment to integrity, we always compete fairly, ethically and lawfully.

What's in bounds?	What's out of bounds?
<ul style="list-style-type: none">• Understanding and complying with government regulations and policies regarding competitive practices, including antitrust.• Safeguarding legally obtained confidential information about competitors from others who could improperly benefit.• Representing accurately and truthfully the quality, performance, features and availability of products and services in conversations, advertising and other public communications.	<ul style="list-style-type: none">• Directly or indirectly discussing, agreeing or contracting with competitors to restrict competition. Some practices that restrict competition include fixing prices, allocating markets, or dividing up customers.• Engaging in industrial espionage, sabotage or bribery.• Misrepresenting our identities, or allowing outside entities we work with to misrepresent themselves, when gathering competitive information.• Providing illegal preferential treatment to another DTE Energy company or other business partner to potentially gain a financial or market advantage.

POLICIES

- *OP1 Confidentiality of Information Related to Constellation New Energy Gas (CNEG) Easement Customers*
- *OP4 Procurement to Pay*
- *OP24 Miscellaneous Product or Service Offerings*

External Communications

What we do has a big impact on our reputation. But what we say has consequences as well.

Media Inquiries

Customers, shareholders, regulators and the general public count on DTE Energy to provide accurate and reliable information about our operations. In an age when information can be disseminated widely and instantaneously, it is important that our communications with external audiences are truthful, timely, compliant with legal and regulatory requirements, and consistent with our values. For this reason, it is important that only authorized persons communicate publicly on behalf of the company.

OUR MARKET

To avoid giving misinformation to the media, it is imperative that only those persons designated to make public statements on behalf of the company do so. If you receive a request from a member of the media for information or comment, don't attempt to answer it yourself. Instead, offer to put them in touch with our Corporate Communications Media Relations team.

Q A reporter approached me in the field and asked me to comment on how long it was taking to restore power. It was a great opportunity for me to set the record straight, but I didn't think I should say anything.

A Your instincts were right. Unless you are an authorized representative or given specific talking points, you should not speak on behalf of the company. Direct the reporter to Corporate Communications, Media Relations team at **313.235.5555**.



We play to win as
a team
...and put the needs of
our enterprise first.

Speaking Engagements and Publications

You should seek approval from your leader and Corporate Communications before you make presentations, give speeches, or submit external publications that relate to DTE Energy's operations or business interests – unless you are authorized to do so as part of your job. And without prior approval, you should not suggest that you are speaking on behalf of DTE Energy when presenting your personal views at professional or community functions. You should also keep in mind that use of the company brand and logo must adhere to approved specifications. For guidance on proper use of the DTE Energy brand, visit the Corporate Communications intranet site.

OUR MARKET

Q

I have been asked to make a presentation at a trade association meeting. Is this okay?

A

Yes, but if the presentation involves your work at DTE Energy, it requires approval by your leader, and may need to be reviewed by Corporate Communications. You should also be sensitive to issues related to security and the protection of customer information.

Social Media

We know that social media enhances our relationships with our customers and the communities we serve. While you work hard in your role, the Corporate Communications team works daily to make sure our customers are well informed about the impact DTE Energy makes in the communities where we serve. That is why we have a number of designated social media spokespeople across the company who are authorized to participate in social media on behalf of DTE Energy.

Even though you are not an authorized spokesperson, supporting our company through social media is as simple as following DTE Energy on Facebook, LinkedIn, or Twitter, reading our blog Empowering Michigan, and sharing the content you like. Just be sure that you do so in accordance with the DTE Energy Way.

The best advice is to approach the online world in the same way you do the physical one. Use common sense and good judgment. The following are some guidelines* for using social media in a way that is appropriate and consistent with our values:

- When it comes to posting about the company, your activity should be consistent with our values and is subject to the DTE Energy Way and other relevant company policies and procedures.
- Always consider what you are saying before posting. One way to think about it, if you would not be comfortable making your comment in a staff meeting or be proud to have your comment broadcast on the evening news, do not post. This can include, but is not limited to, making threats, using racial slurs, and using the internet to intimidate or harass people.
- Discriminatory or threatening comments made toward fellow employees in social media may be considered a violation of policy – just as if it happened in the workplace.
- Regardless of where you are posting from, respect your obligation to protect confidential company and customer information.

** Nothing in these social media guidelines is designed to interfere with, restrain or prevent employee communications regarding wages, hours or other terms and conditions of employment.*





How can I engage in social media?



You are encouraged to retweet or share messages from official company pages, share job postings, and use our "I Can Help" tools if friends and/or connections have concerns.



Facebook: facebook.com/dteenergy



Twitter: twitter.com/DTE_Energy



LinkedIn: linkedin.com/dteenergy/dte-energy

Empowering Michigan: empoweringmichigan.com

OUR RESOURCES



OUR RESOURCES

Audit Committee

Concerns regarding financial statements, auditing, accounting practices or internal controls may be submitted to the Audit Committee through its reporting channel.

Call **877.406.9448**, visit ethicsinaction.dteenergy.com, or write:

DTE Energy
Audit Committee
One Energy Plaza
Room 2337 WCB
Detroit, Michigan 48226-1279

Corporate Safety

Call your Corporate Safety representative or **734.326.4096** during normal business hours or **313.235.8015** during non-business hours for:

- Reporting uncorrected personal safety hazards or conditions
- Reporting accidents or an injury when you don't know where to call
- Arrival of a representative of a regulatory agency at your facility
- Questions on safety regulations

Corporate Secretary's Office

The Corporate Secretary is responsible for corporate governance matters, including the Board of Directors, the *DTE Energy Way* and corporate policies.

Call **313.235.8870** to report violations of our standards related to inside information or insider trading, or for questions about DTE Energy's Board of Directors or corporate policies.

To view corporate policies, visit [Quest](#) and search on policies.

Corporate Security

Contact Corporate Security's 24-hour desk at **313.235.9113** to report any crime committed against the company, an employee or contract worker including:

- Workplace violence
- Threats, real or perceived
- Unauthorized weapons on company property
- Theft/embezzlement
- Illegal drugs
- Trespassing or suspicious behavior
- Any serious accident and any type of accident involving the public

For security pertaining to Nuclear Generation, call **734.586.5215**.

OUR RESOURCES

Customer Inquiry or Concern

When customers have a concern or complaint that hasn't been resolved through our website (**dteenergy.com**) or by calling the Customer Service Line **800.477.4747**, go to the I Can Help! icon on your computer and complete the eform. If you don't have easy access to a computer, ask your supervisor to submit the eform for you.

Ethics and Compliance

For help with conflict of interest situations, information about compliance with laws and regulations, or other related concerns, contact the Chief Ethics and Compliance Officer at **313.235.4777**.

Environmental Management and Resources

Report spills of toxic or hazardous materials to the environmental group at your location or to Environmental Management and Resources at the 24-hour emergency contact number: **313.268.1191** (cell).

General Auditor

If you are uncomfortable reporting violations or misconduct to your leader, you may report them to the General Auditor at **313.235.5426** or the Ethics-in-Action Helpline at **877.406.9448**. You should also contact the General Auditor to report concerns about financial statements, auditing, accounting practices or internal controls.

Human Resources

Call the manager, Employee Relations at **313.235.8943**, the Employee Resources Connection Line at **313.235.3077** or **877.440.9797** for any of the following:

- Reporting alleged acts of discrimination or harassment
- Reporting suspected misconduct
- Reporting uncorrected personal safety hazards
- Questions about collective bargaining agreements
- Questions about the dispute resolution program
- Questions about disciplinary actions

Call **888.327.4347** to request help from the Employee Assistance Program. In case of emergency, call **313.468.2000**.

OUR RESOURCES

Information Technology

For help with safe computing best practices, information protection policies, and cyber-security awareness, call the manager, Information Protection & Security (IPS) at **313.235.9452** or the IT Helpdesk at **313.235.7123**.

Legal Support

If you are personally sued or prosecuted as an individual defendant in a legal or investigatory proceeding in connection with your job at DTE Energy, contact the General Counsel's Office at **313.235.3882** right away. The company will generally provide you with a defense and agree to indemnify you against liabilities incurred while carrying out your duties provided that, in the company's assessment, you were acting in good faith and within the scope of your job responsibilities for the company.

For questions about the Securities and Exchange Commission, contact the Associate General Counsel at **313.235.3260**.

To report personal injuries, property damage, or line contacts, or incidents involving public safety or serious injury, contact the Legal Investigations Hotline at **313.235.3604**.



OUR RESOURCES

Ethics and Compliance Office

The Ethics and Compliance Office is responsible for the governance and oversight of the Ethics-in-Action program; handling reports of suspected inappropriate behavior, misconduct or work practices that are inconsistent with the standards established in the *DTE Energy Way*.

To ask questions, seek guidance, report concerns, or to make a **confidential** – and if desired – **anonymous** report through a third party, contact the Ethics-in-Action Helpline:


By Intranet: **Reporting Ethics Concerns** on the Quest home page

By Intranet:: ethicsinaction.dteenergy.com

By Email: ethicscomp_office@dteenergy.com

By Phone: Ethics-in-Action Helpline
877.406.9448, 24 hours a day

By Mail: DTE Energy
Chief Ethics and Compliance Officer
One Energy Plaza
Room 2188 WCB
Detroit, MI 48226-1279



Nothing contained in this handbook creates an express or implied contract of employment. For employees who are not represented by a union, the relationship between you and the company is referred to as “employment at will.” This means that your employment can be terminated at any time for any reason, with or without cause, with or without notice, by you or by the company. No representative of the company has authority to enter into any agreement contrary to the foregoing “employment at will” relationship. For employees represented by a union, the employment relationship is as described in the applicable collective bargaining agreement.

