



DTE Energy Way

DTE Energy Way

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Introduction

Living Our Values is the Path to Success

DTE Energy is the parent or holding company for a number of subsidiary companies. The DTE Energy Way brings together, for all employees of DTE Energy and its subsidiary companies, the standards of conduct that guide our behavior, performance, and business relationships. These standards grew from our core values of Integrity, Respect, Customer Service, Safety, Learning, and Business Success.

The DTE Energy Way is organized into four parts: **Introduction, Personal Conduct, Protecting Company Assets, and Relationships.**

Introduction

This section provides information on how the DTE Energy Way applies to employees, the employment relationship between employees and their companies, our commitment to investigate and take action when violations occur, and how to get help. Our values of Integrity and Learning require that we honor our values and commitments by taking appropriate action and by learning from our experiences.

Personal Conduct

This part reflects our commitment to treating each other with respect and dignity, working with integrity, and working safely. Some of these standards are based in law, and others just make good sense. These standards will help us become the kind of employees we want to be.

Protecting Company Assets

This section addresses using our resources wisely and in accordance with ethical business practices and applicable laws. These standards embody the core values of Integrity, Business Success, and Learning.

Relationships

This portion describes how we interact with and treat our customers, communities, and other stakeholders. DTE Energy employees strive to embody the Customer Service value. The standards in this section are grounded in all our core values.

We believe that by following the standards contained in the DTE Energy Way, we will be living our core values. If alleged violations of our standards occur, we will appropriately investigate and, where needed, take action to effectively correct the situation and prevent recurrence. Thus, the DTE Energy Way will help us achieve our business goals and provide a supportive and rewarding work environment for us all.



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Our Core Values

Integrity - Honor our values and commitments

- We act with honor and integrity.
- We ensure that our actions are aligned with corporate values.
- We actively contribute through open and honest communication.
- We believe that how we achieve results is as important as the results themselves.

Respect - Treat everyone with dignity

- We respect the diversity and value of each person.
- We recognize and develop others' capabilities.
- We seek first to achieve understanding, and then we strive to be understood.
- We give and receive honest feedback with respect and compassion.

Customer Service - Deliver services and products that meet or exceed our customers' expectations

- We understand and strive to anticipate our customers' needs, externally and internally.
- We measure success by how well we meet and exceed our customers' expectations.
- We improve the quality of life in the communities we serve.
- We protect the environment.

Safety - Commit to performing our jobs in the safest manner possible

- We protect the safety of our customers, the general public and ourselves.
- We work together to continuously improve safety processes.
- We promote safety as a core value to others on and off the job.
- We take responsibility for our own personal safety, follow all safety-related rules and procedures, and remain mindful of the safety of others.

Learning - Build on our past and reach to the future

- We drive for continuous improvement; we refuse to accept the status quo.
- We strive to be innovative and creative.
- We learn from each other; we teach each other.
- We take prudent risks and learn from successes and mistakes.

Business Success - Commit to the strength and vibrancy of the enterprise

- We vigorously pursue sustained growth, profitability, and enhancement of our shareholders' investment.
- We establish and pursue clear, well-defined goals.
- We invest in the near-term with an eye toward long-term success.



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- We have an enterprise-wide focus and live a commitment to DTE Energy's success, recognizing that our company is larger than any one group.
- We will conduct our business in compliance with all applicable laws and regulations.

The DTE Energy Way - How It Applies

The DTE Energy Way was created to provide a broad range of information and guidance about the standards of integrity and business conduct that employees have a responsibility to understand and follow. It does not address every situation or set forth every rule or policy, nor is it a substitute for each employee's responsibility to exercise intelligence, common sense, and good judgment and to obtain guidance when needed.

The DTE Energy Way is supplemented by other policy documents such as enterprise-wide and specific company policies, procedures, programs, guidelines, standard work instructions, work rules, or collective bargaining agreements that apply to you or the DTE Energy subsidiary which employs you.

The DTE Energy Way is not a contract of employment between you and any DTE Energy company that employs you. The DTE Energy Way does not alter any of the provisions covered by a collective bargaining agreement. Where conflicts between the DTE Energy Way and a collective bargaining agreement occur, the collective bargaining agreement takes precedence.

In consultation with Corporate Human Resources, DTE Energy subsidiaries determine their own labor relations, employment, and other human resources policies on matters not covered by the DTE Energy Way.

The DTE Energy Way sets standards for all DTE Energy subsidiaries and their employees. If discrepancies are noted between the DTE Energy Way and your company's individual policies or procedures, please notify your leader or the Corporate Secretary.

It is an expectation that contractors, vendors, and consultants doing work for or on behalf of DTE Energy will perform that work consistent with the DTE Energy Way and other corporate and company policies.

The DTE Energy Way may be changed or eliminated without advance notice at any time by the DTE Energy Chairman and CEO.

DTE Energy retains the sole right to administer and interpret its policy documents and to determine to what extent they are applied in a particular case.

Employment Relationship

For employees who are not represented by a union, employment is by mutual consent, otherwise known as employment-at-will. The employee or the company may terminate the employment relationship at any time, without cause or advance notice. There is no fixed



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duration or fixed terms or conditions to the relationship. This relationship may not be modified except in writing by the DTE Energy Chairman and CEO.

For employees represented by a union, the employment relationship is as described in the applicable collective bargaining agreement

Violations and Discipline

DTE Energy employees are expected to act in an ethical manner and abide by applicable laws, regulations, professional standards, the DTE Energy Way, and any other policies applicable to them. Our high standards reflect our commitment to bring to life our core values of Respect, Integrity, Safety, Learning, Customer Service and Business Success. In particular, we are deeply committed to creating and sustaining a workplace where all employees are free from discrimination and harassment.

For these reasons, violations of any of our standards will result in action, from coaching to formal discipline up to and including termination. The appropriate company organization will conduct an investigation to determine whether a violation has occurred and, where appropriate, notify local law enforcement agencies. Civil litigation may be initiated where appropriate.

The following list of violations (though not all-inclusive) will likely result in termination, even on the first offense:

- **From the Harassment standards:**
 - Creating, displaying, or using hate group words or symbols on company business or company property
- **From the Workplace Safety standards:**
 - Unauthorized possession of firearms or other weapons on company business or company property
 - Physical assaults
 - Willful safety violations
- **From the Fitness for Duty standards:**
 - 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
- **From the Property standards:**
 - Theft of company, employee, or customer property, including theft of company funds through falsifying pay or business expense records
- **From the Time Standards:**
 - Absent, No Report, three consecutive days



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- **From the Funds Standards:**
 - Willfully, materially misstating financial statements

Reporting Misconduct

We will immediately report any known or suspected misconduct. Information resulting from company investigations is confidential and will be disclosed by the company only on a need-to-know basis.

We will not retaliate against anyone who reports known or suspected misconduct.

We will not make false reports.

We will report any suspected acts of retaliation against ourselves or others involved in reporting or investigating reports of misconduct.

Suspected violations should be reported immediately.

Investigating Reports

We will fully cooperate in any company investigation of misconduct or work-related matters.

If involved in an investigation, we will only disclose information about the investigation to those with a legitimate need to know.

We will not interfere with or obstruct an investigation, including misrepresenting facts or failing to disclose facts.

Issuing Discipline

We are subject to disciplinary action up to and including termination for violations of the law and company policies. Certain matters may be referred to legal authorities for investigation and potential prosecution in addition to being handled through the internal disciplinary process.

Leaders who condone or know of such violations by subordinates and do not report them, or fail to take appropriate corrective action, also may be disciplined up to and including termination.

The company may seek restitution from employees who have engaged in misconduct.

We will comply with regulations that specify sanctions for violations, such as Department of Transportation and Nuclear Regulatory Commission rules on fitness for duty.



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Review and Intervention

We provide a process for non-represented employees to seek review of discipline issued to them. Union-represented employees may seek review through the grievance procedure contained in their collective bargaining agreement.

A process for employees to obtain counseling or the assistance of an advisor to help them improve their compliance with company standards is available through Human Resources.

Getting Help

DTE Energy and its employees have an obligation to ensure that our actions reflect our core values and standards contained in the DTE Energy Way. Leaders have an additional responsibility to demonstrate ethical leadership and to promote a work environment that upholds DTE Energy's reputation for integrity and trust.

When we have questions about company standards or proper business conduct, we will seek guidance from our leaders or the appropriate organization.

Personal Conduct

Nondiscrimination and Equal Opportunity

At DTE Energy, we are committed to establishing and maintaining a workplace free from discrimination, where each of us has equal opportunity. DTE Energy policy, as well as federal, state, and local laws, prohibits unlawful discrimination.

Discrimination is the improper treatment of another person based on protected characteristics that have no proper bearing on the individual's ability to meet job requirements.

Employees who have a question, problem, concern or complaint related to discrimination or equal opportunity should contact Human Resources. Contacts with Human Resources will be treated confidentially and the company will only disclose information to those with a need to know.

We will investigate all complaints alleging discrimination, and we will not retaliate against individuals who file complaints of discrimination.

Equal Opportunity

DTE Energy provides equal opportunity for employment to all individuals without regard to sex, race, color, age, religion, height, weight, genetic information, marital status, sexual orientation, national origin, disability, protected veteran status, or any other status protected by law. Conditions and privileges of employment are administered to all employees without unlawful discrimination.



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Consistent with the principles of Affirmative Action in the workplace, DTE Energy strives to ensure that minorities and women are appropriately represented at all levels within its work force.

Our Standards

- We will not discriminate against employees or applicants for employment.
- We will support programs and initiatives to further our ongoing commitment to workforce diversity and equal opportunity, both in terms of employment opportunities and business relationships.
- We will make reasonable accommodation for employees and applicants as provided by law.
- We will only use facilities or sponsor events or memberships to facilities or organizations that do not have exclusionary membership policies.

Harassment

We are committed to maintaining an environment that is free from all forms of harassment. Such behavior demeans others and threatens our ability to create a workplace in which we can be productive. Harassment may also violate the law, result in substantial financial liability, and risk our company's reputation.

We will take responsibility for our own behavior and will not tolerate the actions of others that are inconsistent with a supportive and respectful environment. Harassment of fellow employees, customers, or others encountered while on the job is prohibited and will not be tolerated.

We will investigate all complaints alleging harassment, and we will not retaliate against individuals who file complaints of harassment.

Sexual Harassment

Sexual harassment is an infringement of an employee's right to work in an environment free from unlawful sexual pressures. Sexual harassment includes any unwelcome sexual attention, sexual advances; requests for sexual favors; or other verbal, visual, or physical conduct of a sexual nature when:

- Submission to the conduct is either an explicit or implicit term or condition of employment.
- Submission to or rejection of the conduct is used as a basis for an employment decision affecting the person involved.
- The conduct has the purpose or effect of unreasonably interfering with the individual's work performance, or of creating an intimidating, hostile, or offensive work environment.



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Examples of Harassment

Following are some examples of sexual harassment and other forms of behavior on company business and/or company property that may be considered offensive and a violation of these standards:

- Unwelcome sexual advances or flirtations
- Verbal abuse of a sexual nature
- Sexual activity on company property or company time
- Inappropriate touching
- Graphic verbal commentaries about an individual's body
- Sexually degrading words used to describe an individual, including sexual nicknames
- Display in the workplace of sexually suggestive objects, pictures, videos, or cartoons, or inappropriate Internet sites
- Creating a hostile environment through the use or toleration of offensive words, jokes, depictions, or threats
- Offensive slurs, such as those related to race, ethnicity, national origin, or sexual orientation
- Creating, displaying, or using hate group words or symbols
- Posting derogatory material
- Circulating or collecting demeaning materials
- Ridiculing based on physical appearance or characteristics

Our Standards

- We will be respectful of each other, including customers and others we encounter in our jobs.
- We will not participate in any activity that ridicules, belittles, intimidates, or otherwise demeans others.
- We will not engage in any form of sexual harassment. We will report immediately any instances of actual or potential harassment that we witness, or have knowledge of, to our leader or Human Resources.
- We will not retaliate against individuals who file complaints of harassment of any kind.

Diversity

DTE Energy provides and supports an environment that fosters diversity based on distinguishing characteristics such as national origin, gender, union affiliation, culture, race, education, sexual orientation, color, lifestyle, military status, physical ability, family responsibilities, socioeconomic status, age, religion, marital status, ethnicity, or any other distinguishing characteristics.

We are committed to a culture and climate where individuals can achieve their maximum potential while contributing to the company's success. We will work in the spirit of diversity while serving our customers and meeting our changing business needs. We will provide opportunities for learning about diversity and increasing awareness of diversity principles.



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Our Standards

- We will treat employees, customers, suppliers, and all with whom we come into contact with dignity and respect.
- We will recognize the unique contributions of all individuals.
- We will seek opportunities to be the energy provider of choice to, and to understand the needs of, our diverse communities.
- We will partner with suppliers and vendors who exhibit behaviors consistent with our diversity principles.

Performance

Business results are absolutely critical to DTE Energy's success. But business results alone are not a sufficient measure of an individual's performance. How we accomplish those business results is just as important as what we accomplish. Employees are responsible and held accountable for meeting performance expectations and for achieving desired results while living our core values and complying with the standards in the DTE Energy Way.

Leaders are responsible for setting expectations for their employees, periodically evaluating employee performance, evaluating results achieved, providing feedback, and rewarding and/or recognizing good performance. Leaders will offer training and counseling to help employees reach a good balance between people and business skills.

Leaders are also responsible for establishing work rules or standards governing their day-to-day operations. Some examples are the attendance guidelines, rules for calling in when absent, personal appearance standards appropriate to the workplace, workspace appearance standards, and other rules about how work is scheduled and accomplished safely and effectively.

Our Standards

- We will strive to meet or exceed performance expectations.
- We will comply with work rules and other standards established by our leaders and, where applicable, collective bargaining agreements.
- We will not operate lotteries or gamble (in any form) on company time or using company resources.

Indemnification

If an employee becomes involved in a legal matter arising out of employment at DTE Energy or its subsidiaries, the company will provide or select legal counsel and indemnify that employee, if, in the opinion of the General Counsel:

- The employee was acting in good faith and within the scope of the job responsibilities.
- Legal counsel and/or indemnification is not otherwise available to the employee.



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Personal Interests

We encourage employees to be involved in activities and personal interests outside of work responsibilities. At the same time, we should always take care that such involvements do not inappropriately impact our work responsibilities or compromise our ability to make sound, impartial, and objective business decisions. Such conflicts of interest can cause our work to suffer, and lead to poor quality of service.

Our Standards

- We will act in the best interests of our customers, other business partners, and DTE Energy.
- We will avoid improper influence, or even the appearance of improper influence, by non-business considerations.
- We will act with integrity, including being honest and candid while still maintaining the confidentiality of company information.
- We will observe applicable governmental laws, rules, and regulations, as well as the company's policies and procedures.
- We will comply with the requirements of applicable accounting and auditing standards.
- We will not seek competitive advantage through unlawful or unethical business practices.
- We will avoid conflicts of interest.
- We will not be involved, directly or indirectly, in any business transaction in which we have a personal conflict of interest with DTE Energy or its subsidiaries (including, but not limited to, suppliers and vendors).
- We will adhere to honest and ethical conduct, including ethical handling of actual or potential conflicts of interest between personal and professional relationships.

Conflict of Interest

A conflict of interest may arise when an individual's private interest interferes in any way, or even appears to interfere, with the interests of the company as a whole. Examples of private interests include, but are not limited to, outside activities, financial or other business interests, personal or charitable relationships, and political interests or offices.

A conflict situation may arise when an employee takes actions or has interests that may make it difficult to perform his or her company work objectively and effectively. Conflicts of interest may also arise if an employee, or a member of his or her immediate family, receives improper personal benefits as a result of his or her position with the company.

An employee may not be involved in a business transaction in which the employee has a conflict of interest with the company. Anything that could present a conflict of interest for an employee may also present a conflict of interest if it is related to a member of that employee's immediate family.



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Because potential conflicts of interest may not always be clear cut, any material transaction or relationship that involves, or may involve, a conflict of interest or potential conflict of interest with the Company should be disclosed promptly to the employee's Leader.

Examples of conflicts of interest include, but are not limited to:

- Having a significant investment in or ownership of a business that is a competitor, supplier, or joint venture partner to DTE Energy.
- Using company resources such as property, time, funds, information, records, intellectual or proprietary information, computer software, or our company name for outside activities or to perform another job without management approval.
- Representing oneself as performing work for the company while performing another job outside the company.
- Giving or receiving cash of any amount from suppliers or customers.
- Giving or receiving gifts greater than nominal value (more than \$75) or accepting loans from suppliers or customers (except banks in the ordinary course of business) including frequently providing or accepting meals or entertainment from suppliers or customers.

Outside Activities

Our Standards

- To avoid possible conflicts of interest, we will exercise care in consulting with or aiding a company or organization that is a competitor to DTE Energy in the same lines of business, including energy generation, distribution, transmission, marketing, or energy-related services, or any other line of business in which DTE Energy is engaged or actively seeking to enter.
- We will not use company resources (such as property, time, funds, information, records, intellectual or proprietary information, computer software, or our company name) for outside activities without appropriate management approval.
- If we hold a public office, either appointed or elected, we will not participate in any discussion, vote, or decision-making process that involves the interests of DTE Energy or its competitors. When such situations arise, we will disclose the conflict and remove ourselves from the discussion and final decision.
- We will receive approval from our 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.
- We will not misrepresent ourselves as DTE Energy employees when performing outside work.



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Financial Interests

Our Standards

- We will not offer or accept personal loans or other guarantees, or loan preferences/discounts not offered widely, to or from suppliers or competitors of DTE Energy.
- We will not use company funds to make company contributions to political parties or causes except where permitted by law and company policy.
- We will not use company resources to financially support political organizations or causes that are not supported by the company.
- We will not purchase or sell company securities based on insider information.
- We will not disburse corporate funds for purposes different than those recorded.

Personal Relationships

Our Standards

- We will avoid inappropriate reporting relationships and will not directly or indirectly supervise or report to persons with whom we have a family or close personal relationship. If this situation develops, we will immediately disclose the matter to Human Resources for review and appropriate action.
- We will also reasonably separate those with whom we have a family or close personal relationship from our influence in areas of job assignments, performance evaluations, promotions, compensation decisions, and hiring practices.
- We will not be involved, directly or indirectly, in any company transaction or account that directly involves someone with whom we have a family or close personal relationship or outside business relationship.

Employee Privacy

As employees, we will respect each other's privacy. We have a responsibility not to engage in behavior that runs contrary to our commitment to maintain a workplace of mutual consideration and which could inhibit us from effectively working together.

From time to time, the company may conduct service-quality observations for training, re-training, supervisory assistance, or service measurement. Such observations are conducted in full compliance with state and federal laws.

At certain times, it is necessary to search employee workspaces for the safety and protection of other employees and the company and its assets, and to investigate possible violations of company policy or law.

- DTE Energy retains the right to search any and all company property at any time, including, but not limited to, offices, desks, lockers, vehicles, e-mail, voice mail, DTE Energy phone usage records, and computer files. This applies also to company property



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located off-premises, such as company property used by employees who work in telecommuting jobs.

- DTE Energy also retains the right to search all persons, parcels, and vehicles on company property.
- To safeguard our employees and corporate information, DTE Energy prohibits the unauthorized use of video, photographic, and audio recording equipment on company premises.

DTE Energy is not normally 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.

Our Standards

- We will access or otherwise use our records on employees only for legitimate business needs.
- We will disclose employee information only when specifically authorized to do so by management and only to authorized persons having a legitimate need to know under DTE Energy policies or applicable law.
- We will gather and retain only that information regarding employees that is relevant for business purposes.

Workplace Safety

Our health and safety and the health and safety of our customers, suppliers, contractors and all other visitors are a priority at DTE Energy. We should always be concerned about the impact of company operations on our daily activities, and never put ourselves or others in situations of unnecessary risk. Safety comes first.

Safe Work Environment

Employees should immediately report actual or potential unsafe or hazardous conditions to their leaders for appropriate action. Where unsafe conditions have been previously reported and have gone uncorrected, employees should contact Corporate Safety for personal hazards or Environmental Protection for environmental hazards.

DTE Energy will cooperate with government health and safety officials in their reviews of company facilities and operations. If approached by anyone requesting such a review, immediately contact your local safety or legal organization for assistance.

Our Standards

- For our personal safety, as well as the safety of others, employees are expected to wear their employee badges at all times, unless prevented by safety considerations.
- No job we do, nor service we perform, is so urgent that we cannot take the time to perform each aspect of the job safely.
- We will adhere to all of our company's protective tagging system rules.



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- We will follow all of our company's safety procedures for the use of tools, equipment, and working environments. We will not perform tasks using equipment for which we are not trained, nor assign others to use such equipment for which they have not been trained.
- We will look out for each other, especially visitors and new employees who may not be familiar with DTE Energy's safety practices, and if necessary, remind them about safety rules.
- We will use appropriate personal protective equipment provided by our company according to defined procedures.
- We will follow all laws and our company's standards regarding vehicle operation and traffic safety. When possession of a driver's license is a requirement for the job, the loss (suspended, revoked, or CDL disqualified) of such license must be reported to the appropriate leader by the end of the next business day.
- We will wear seat belts when operating or riding in any motorized vehicle equipped with seat belts, on or off the road, while on company business.
- We will properly handle, store, and use hazardous substances according to our company's procedures, Material Safety Data Sheets (MSDS), and applicable law. We will understand the hazards of chemicals we use.
- We are a smoke-free company.
- We will immediately report all accidents, particularly those involving physical injury, as required by law and company policy.

Workplace Violence

DTE Energy's security organizations - working with organizations throughout the company - have implemented security practices for the protection of employees. These include responding to, investigating, and where appropriate, pursuing criminal prosecution, for incidents involving illegal acts, public liability and serious injury, threats, and workplace violence, including domestic violence that spills into the workplace.

Our Standards

- We will not make threats of physical harm or violence or engage in any other actions that are threatening or hostile in nature.
- We will not engage in any assaults, hostile physical contact, or physical intimidation.
- We will not use any tool, supply, or other resource in a manner that implies it is a weapon.
- We will not carry weapons onto company property, in company vehicles, or while conducting company business, even if we have a permit or license to carry them. Only the DTE Energy Chief Security Officer can authorize employees to carry weapons on company property or on company business.



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Fitness for Duty

DTE Energy expects its employees to be fit for duty when at work. Physical and emotional fitness assure that we can perform the requirements of our job without risk to ourselves or others. Violations can threaten our company's reputation and result in criminal prosecution.

The criteria for determining whether an employee is fit for duty are based on applicable regulations and policies.

- Employees who are not fit for duty will not be allowed to work.
- Employees who, for reasons other than substance abuse, are medically restricted may receive reasonable accommodation.

Random drug and alcohol tests are required for senior management employees and for other employees when required by their company's policies.

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.

DTE Energy encourages early identification of employees whose performance is affected by medical or personal problems and assists them in obtaining professional treatment through an Employee Assistance Program.

Our Standards

- We will not work, or report to work, unfit for duty because of the use of alcohol, illegal drugs, or controlled substances.
- We will not drive while unfit for duty, whether driving a company vehicle on or off duty or driving a personal vehicle on company business.
- We will not consume or be under the influence of alcohol while conducting company business. Where company business is conducted in conjunction with an after-hours social function, alcohol consumption in moderation is permissible.
- Alcoholic beverages may be served on company property at after-hours company events with approval from the appropriate officer.
- We will inform Disability Case Management or the designated medical personnel for our specific company when we are taking any prescription or nonprescription medication that may impair our ability to perform our jobs or put ourselves or others at risk.
- We will not sell, possess, use, manufacture, or distribute any (a) illegal drugs or (b) controlled substances without a prescription, while on company business or on company property.



Protecting Company Assets

Authority

DTE Energy empowers employees with the authority to commit company resources necessary to perform their jobs. All expenditures made in the performance of assigned duties must be made in accordance with company policies.

This authority is intended for use within the employee's area of responsibility and within budget constraints, and must be in compliance with company policy and organizational guidelines.

Organizations determine the extent to which documents they initiate or process are properly authorized, and that signatures, when present, are authentic. Electronic signatures may be used with appropriate controls.

Our Standards

- We will exercise our authority with care and in compliance with company policy.
- We will not approve our own expenses or those of employees who are family members or residents of our household.
- We will be vigilant about shareholder value and will only spend money where there is a justified business case.

Property

Shareholders trust us with properly acquiring, handling, and disposing of company property, and maximizing return on assets. How we use and care for such property also affects the prices that we charge our customers, and ultimately, our financial success. Therefore, we have a direct interest in ensuring that we, and all others, make wise use of our company assets and properly safeguard them.

Some examples of property include real estate, power generation and energy delivery facilities, gas storage and delivery facilities, equipment, supplies, tools, inventory, funds, computer systems and equipment, computer software, vehicles, records or reports, proprietary information, intellectual or other sensitive materials, and e-mail or voice mail communications.

Each company facility has specific assigned responsibilities for implementing appropriate safety, security, access control, fire protection, and other emergency preparedness and response practices (see Emergency Management).

Our Standards

- We will not take, use, sell, borrow, loan, give away, intentionally damage, sabotage, destroy or otherwise dispose of company property, regardless of condition or value,



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without specific authorization. This includes unauthorized use of electricity or gas for ourselves or others.

- We will protect company property from actual or potential theft, improper use, misuse, damage, or sabotage, and follow procedures designed for the protection of company property.
- We will only use company property for personal or other outside activities as allowed by company policy or with authorization from our leader, and we shall not operate a personal business enterprise with company resources.
- We are obligated to identify and properly dispose of unused or underutilized assets.

Funds

How we treat company funds has a direct impact on our overall financial success. Proper handling and safeguarding of such funds provides us with greater resources to achieve our objectives and helps prevent misuse and theft. We will treat company funds as we would our own, handling them prudently and working in an ethical manner to get the best value in exchange for them.

Company funds are any documents or records that have financial value or are equivalent to documents or records with financial value. Some examples are currency, checks, vouchers, credit or other charge cards, receivables, payables, money orders, postage, bills, benefit enrollment forms, reimbursement claims, estimates, paychecks, expense reimbursements, and invoices.

Our Standards

- We will safeguard all funds and abide by company policies designed for their security.
- We will strive to ensure that the company receives good value from company funds or personal funds that will be reimbursed.
- We will be accurate and honest in preparing records of funds and related transactions. We will also ensure that records prepared for our approval are accurate, honest, and timely, and that the use of company funds is appropriate and proper.
- We will not use company funds for personal use or for company business that is not approved.
- We will adhere to company policies and guidelines on proper accounting and expense reimbursement.

Records

The information we record tells us how we are performing - and this keeps us in business. Complete, accurate, and honest records help us stay compliant with regulations, understand our business performance, identify marketplace strategies, and record transactions that are ultimately compiled into our financial statements or other company records. These records also demonstrate our efforts to conduct our business with integrity and consideration for our many stakeholders. Various laws impose stringent penalties for misuse, improper recording, and omission of certain information in company records.



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Company records are defined as all data and knowledge purchased, produced, acquired, reported or otherwise used by the company. This includes information developed by employees while on company time or engaged in company business. Some examples are reports, timesheets, invoices, payroll and service records, customer records, proprietary data or confidential information, nuclear safeguards information, engineering design documents, measurement and performance records, and other essential data, whether in computer files, on paper, or on other media.

Our Standards

- We will prepare company records with accuracy and honesty.
- We will not knowingly prepare or submit a false or misleading report or record. We will report to our management any improper or false information of which we become aware.
- We will not alter company records without proper authorization.
- We will create or prepare company records that comply with federal, state, and local laws.
- We will retain company records according to applicable laws and company policies and as necessary for business purposes. We will not maintain corporate records beyond the retention period established within the appropriate corporate record retention schedules and company policy.
- We will provide appropriate confidentiality and protection of all proprietary and/or personal records and information we handle related to employees, customers, suppliers, or our other partners, only allowing access to specifically authorized personnel for authorized purposes.
- We will advise customers and suppliers of any clerical or accounting errors, as they become known, and we will make prompt correction of errors through credits, refunds, or other mutually acceptable means.

Time

Efficient use and proper recording of our work time is important to meeting our obligations to each other, our customers, and our shareholders. Accurate timekeeping will allow the company to understand its proper cost structure, which contributes to profitability and ultimately the price we need to charge our customers. By making the best use of our time and not allowing outside interests to interfere with our time on the job, we further ensure our success in an increasingly challenging marketplace.

Company time is that time we spend on the job, traveling on business, conducting business activities, or otherwise representing the company.

Where it makes good business sense, DTE Energy supports the use of alternative work schedules and/or locations. Because of impacts on benefits, holiday scheduling, and the work of others in the group, agreements for alternative work schedules/locations require approval of management.



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Our Standards

- We will use work time productively and effectively and be on the job when scheduled.
- We will record our work time carefully and accurately.
- We will follow our departmental policies regarding work time schedules.
- We will not ask fellow employees to use their work time for non-business purposes.
- We will promote workplace flexibility to strive to maintain work/life balance while meeting company objectives.

Intellectual Property

Our ideas, inventions, concepts, and other information we produce are important assets to our company. These are central in developing new products and attracting new business opportunities. When we do not identify or otherwise protect this intellectual property, we risk losing our exclusive rights to it and the competitive advantages it offers. In addition to protecting the intellectual property of DTE Energy, we will also afford this same respect to the intellectual property of others.

Some examples of intellectual property we want to protect from disclosure are unpatented technology, trade secrets, and other confidential information. Some examples of intellectual property we want to protect because we want to disclose it are trademarks, service marks, patented technology, and copyrighted information.

Our Standards

- We will protect the undisclosed intellectual property of DTE Energy by avoiding any inappropriate or unauthorized disclosures of unpatented technology, trade secrets, or other confidential information.
- We will use and enforce confidentiality agreements with third parties to protect our undisclosed intellectual property when it is necessary to share that information with another party.
- We will protect trademarks or service marks from illegal or other misuse by ensuring trademarks or service marks are identified as trademarks (™), service marks (sm), or, if a registered trademark or service mark by (®). Copyrighted materials will be marked with "© (year) DTE Energy Company," and patented items will be identified.
- We will disclose to management any intellectual property (for example, software program, technical development) developed on company time or using company resources (including proprietary information) so the company can seek to protect it.
- We will assist the company in obtaining any appropriate patent, copyright, trademark, or service mark protection for the intellectual property of the company.
- We will respect the ownership of the intellectual property of others by properly using their trademarks; by not copying, distributing, or modifying third-party copyrighted materials, documents, or computer programs without permission; and by not violating patent rights of third parties.
- We will honor the confidentiality agreements we have with third parties to protect their confidential information.



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- We will follow company policies and all applicable rules and laws regarding intellectual property.

Proprietary Information

Like other intellectual property rights, proprietary information plays a key role in our business strategies. Much of the information developed or held by DTE Energy is proprietary and must be protected from unauthorized disclosure and unauthorized use. Carefully handling and safeguarding such information is critical to maintaining a competitive advantage and future opportunities.

Proprietary information consists of any information owned or controlled by the company and/or its subsidiaries that has actual or potential economic value to us; would be of value to our competitors if disclosed; or is generally not known to the public and must not be disclosed as a matter of DTE Energy policy.

Some examples of proprietary information are devices, programs, methods, techniques, discoveries, inventions, research, customer and employee information, business and marketing plans, sales and marketing data, financial and operating data, and planned outage schedules.

We will not distribute proprietary information to third parties without a written non-disclosure agreement that has legal and leader approval.

Employees leaving the company shall not take any proprietary information with them.

Our Standards

- We will properly label, handle, and secure all proprietary information.
- We will obtain and/or use a competitor's proprietary information only when it is made public, obtained legally, or its acquisition is authorized in writing by the competitor.
- We will adhere to applicable laws and regulations governing information disclosure among DTE Energy companies.

Inside Information/Insider Trading

A certain type of information, called "inside" information, has an important role in our business. With it, we are able to consider various business opportunities and their potential benefits. However, inappropriately using or releasing inside information can have negative effects on our company strategy. Such actions can destroy advantageous business dealings and deprive us of valuable opportunities to improve our services to customers. Further, federal law and Securities and Exchange Commission regulations make it illegal to buy or sell securities on the basis of inside information, or pass inside information on to others who may buy or sell securities.

Inside information is material nonpublic information that could influence an investor's decision to buy, sell or otherwise trade securities of the relevant company (for example, exercise stock options). Some examples are not-yet-announced information about judicial or regulatory



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decisions, dividend declarations, plans to issue or buy back securities, earnings announcements, pending acquisitions, joint venture and contract negotiations, and knowledge of potential DTE Energy transactions with other companies that are not yet publicly disclosed.

Our Standards

- We will not disclose inside information that concerns DTE Energy or any other company to parties, including employees, who do not have a legitimate business need to know.
- We will use caution when discussing material inside information in public places or anywhere else where our conversations can be overheard. Cellular phones are not considered secure for discussing inside information.
- Even when public announcements are made pertaining to inside information, we will not disclose information we know is still confidential.
- We will not trade in the securities of DTE Energy or any other company on the basis of inside information. We will not pass on inside information to others who may buy or sell securities.

Computer Systems and Telecommunications

DTE Energy telecommunications and computer systems are vital to the operation of our business. Our success is directly related to how we effectively use and properly safeguard these systems.

Some more specific examples of these systems are company telephones, voice mail, e-mail, Intranet/Internet accounts, fax machines, pagers, desktop computers, computer systems and networks, information used to access our networks, such as passwords and IDs, portable computer devices, and building access keycards.

Although company telecommunications and computer systems are intended to be used solely for business purposes, occasional personal use (for example, personal phone calls, voice mail messages, and e-mail) is permissible as long as such use does not:

- Interfere with our work responsibilities or normal business operations.
- Involve personal outside business and/or other organizations and activities such as soliciting or promoting personal commercial ventures or political or religious causes.
- Lead to unreasonable costs to the company.
- Violate our core values or the standards contained in the DTE Energy Way or any other DTE Energy policies.

The use of company telecommunications and computer systems may be monitored or accessed by management to ensure the integrity of the technology and to detect unauthorized access or use, and for other business purposes.



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Our Standards

- We will maintain the confidentiality and integrity of our telecommunications and computer systems, passwords, access codes, and other related company technologies and data. We will not access or use these technologies without proper authorization or for unauthorized purposes.
- We will use company telecommunications and computer systems in a responsible manner and never in any way that may be disruptive, cause offense to others, harm morale, or that in the judgment of DTE Energy, encourages or permits a hostile work environment.
- We will never use company telecommunications and computer systems to engage in activities that are illegal or violate company policies, and never use the Internet or similar services in ways that would lead to liability, embarrassment, or loss of credibility or reputation to DTE Energy.
- We will introduce only accurate and truthful data in our telecommunications and computer systems.
- We will only acquire, use, alter, dispose of, or destroy data or electronic files with proper authorization.
- We will not access company computer information (for example, customer or personnel records) without specific authorization and a legitimate business purpose.
- We will appropriately protect company information being communicated over public (such as the Internet) or internal networks to avoid possible compromise of proprietary and/or confidential communication.
- We will only use approved and properly licensed software programs, and we will only use public domain software with management approval
- We will log off computer systems, lock screens, or take other precautions to ensure their security in our absence.

Affiliate Transactions

Transactions between DTE Energy companies should be consistent with internal policies and applicable laws and regulations. Affiliate-to-affiliate transactions should be conducted in a good faith, business-like manner with contracts or agreements for any sales or transfers of any products, goods, or services.

Our Standards

- We will accurately report and document time and expense charges related to inter-company transactions and ensure such charges comply with various legal and company standards and accounting requirements.
- It is the responsibility of all employees to be aware of and to comply with the codes of conduct and standards of conduct that apply to their work activity.



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Reputation

DTE Energy's brands and reputation are valuable assets. DTE Energy will manage its branding activity to build maximum long-term value.

Corporate Communications acts as the company's steward of all brand-related strategy, and evaluates communications or initiatives for appropriateness to the character or strategy of any company brand.

Our Standards

- We will seek approval from Corporate Communications before using DTE Energy's name or our connection with the company in any endorsements, testimonials, or other promotional activities.
- We will ensure that anything we say or write unrelated to our business activities is not identified as belonging to or representing the view of DTE Energy.

Emergency Management

DTE Energy is committed to develop, implement, exercise, and maintain risk-based procedures and plans that will prevent or minimize the impact of an emergency on personnel, business facilities, business operations, and customer service.

DTE Energy organizations are responsible for conducting risk and business impact analyses and, based on the results, developing, exercising, maintaining, and executing:

- Site emergency response plans that address the safety of personnel and the protection of property during actual or potential emergencies
- Business continuity plans that address preventing business disruptions, the resumption of business operations, and the restoration of business facilities after an emergency
- Corporate emergency operations plans that coordinate the organization's response to major emergencies

We will fulfill our roles as good corporate citizens as well as owners and operators of critical infrastructures, by working closely with local, state, and federal emergency management agencies. Corporate Security and Investigations will maintain a corporate program that establishes standards based upon state and federal requirements and industry best practices and assist corporate management in monitoring and maintaining compliance.

Where possible, DTE Energy subsidiaries help each other respond to and recover from catastrophic emergencies or disasters.



DTE Energy Way

Our Standards

- We will be prepared to perform our emergency assignments when needed, keep our training requirements up to date, and respond when requested.

Relationships

Communication

DTE Energy is committed to using effective communication to build good relationships with shareholders, customers, employees, and the general public. Communication will always be truthful, timely, compliant with legal and regulatory requirements, and consistent with DTE Energy's core values.

Internal Communication

A two-way flow of information is encouraged and expected, subject to affiliate rules and codes of conduct. Ideas and information should flow between and among employees and organizations at all levels to enhance understanding and further achievement of business objectives.

Leaders are expected to use regular meetings, written communication, and other appropriate vehicles to ensure employees are informed about the company's plans and results, as well as issues affecting them as individuals.

We use a variety of communication vehicles to help all employees know our business and how they contribute to our success. However, these vehicles are not intended to replace face-to-face dialogue, which is desirable and essential at all levels, throughout the organizations. Electronic communications are preferred over printed communications where practical and appropriate.

External Communication

The company is forthcoming in providing information to the media and other interested parties seeking information about the company. However, care must be exercised both to protect the privacy of employees and customers, and to avoid disclosing proprietary or confidential information. For that reason, all communication with the news media is managed by Corporate Communications.

When formal communications other than press releases, such as presentations, speeches, and brochures, are developed that impact corporate messaging, brand, and reputation, they must be approved by the appropriate company officer and Corporate Communications.



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Our Standards

- We will be open and honest in our communications.
- We will refer all requests for information from the news media to Corporate Communications, Media Relations area for response.

Public Safety

DTE Energy is committed to operating its facilities in a manner consistent with public safety. We will evaluate equipment, stay abreast of research regarding the potential hazards of electric and gas utility operations, and take appropriate actions. Each organization is responsible for equipment and property under its jurisdiction and for taking appropriate actions regarding public safety. Safety comes first.

DTE Energy develops public safety programs to raise the level of awareness of the general public, civil response groups, and special interest groups so they recognize the dangers of coming into contact with energized equipment and the hazards of natural gas and carbon monoxide.

Our Standards

- We will operate our business with consideration for public safety.
- We will immediately endeavor to make conditions safe and then report public safety incidents such as a personal injury to a member of the public, equipment damage, or an emergency that might endanger lives or interrupt service. If it's unclear where to make the report, call Corporate Security and Investigations.

Corporate Citizenship

Charitable Contributions

DTE Energy and its employees have a long history of commitment to the communities in which we live and work. We carry out that commitment by contributing financial, human, and material resources to community causes. The communities, the general public, and DTE Energy all benefit from such contributions.

These contributions support our commitment to increasing both customer and shareholder value because they strengthen the quality of life and support social and economic progress and stability.

Contributions are managed by the DTE Energy Foundation, which is a separate legal entity from DTE Energy. All contributions of cash or materials should be made with the approval of an officer of the DTE Energy Foundation or by the Foundation Board of Directors.



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Organizations may approve their own contributions of in-kind services (such as time and labor, printing, mailing, design services, or photography) and/or small donations if they are consistent with company community involvement priorities, company policy, and in support of community projects that clearly support company goals and help build business relationships while benefiting the community.

Our Standards

- We will follow company policy and procedures for requesting or making contributions.

Community Involvement

Voluntary service is an honored tradition at DTE Energy. Our employees have helped build this tradition, contributing their own skills and time to address a wide range of community needs.

Most non-profit organizations expect volunteers and board members to donate both time and money to their cause. Our employees are free to donate their personal time and money as they desire, but under no circumstances may anyone make an implied or explicit commitment of company resources, either cash or non-cash, without prior written approval of an Officer of the DTE Energy Foundation, or the written consent of the DTE Energy Foundation Board of Directors.

Our Standards

- We will conduct all volunteer activities on our own time unless given approval by our leader.

Political Contributions

DTE Energy engages actively in the government process as a good corporate citizen. Employees are also encouraged, as individuals, to take an active interest in local, state, and national government and to participate in political activities consistent with applicable law, including making personal contributions in support of candidates or political organizations of their choice.

Laws regulate the way in which political activities can be conducted and failure to abide by these laws could result in severe penalties.

DTE Energy administers political action committees (PACs) that accept voluntary contributions from those who wish to support the political process in a way that identifies with DTE Energy. Employee participation or non-participation in the DTE Energy PAC is voluntary and will not impact the terms or conditions of an employee's employment.



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Our Standards

- We will only make payments of company funds to any political party, candidate, or campaign if permitted under applicable law and approved in advance by the appropriate legal organization. Employees who distribute company funds to support candidates or political parties will comply with federal and state laws and regulations governing these activities.
- We will not use company funds, time, equipment, supplies, or facilities when making personal political contributions in support of candidates or political organizations.
- We will ensure that when we speak out on public issues, we do not give the appearance that we are speaking out or acting on DTE Energy's behalf unless we have specific authorization to do so.

Customers

Customer Service

Customers are the key to the success of DTE Energy. It is the customer's view of the value we provide that determines whether they want to use the products and services DTE Energy provides. We will constantly monitor what our customers value and evaluate our performance and cost in delivering that value.

Regardless of our responsibilities, we all ultimately impact the delivery of superior customer value. Thousands of times each day, employees help shape the opinions of our customers. Any interaction an external customer has with a DTE Energy employee influences that customer's perception of the company. These interactions can occur on the job or during off-hours and are called "moments of truth." For example, we can refer inquiries from friends and neighbors about energy services to the appropriate Customer Inquiry/Concern hotline.

Customer Privacy

Our customers have come to trust us with their account information, records, and energy usage data. DTE Energy treats customer data as confidential. We will not release customer private information to third parties except when legally required, in the course of an investigation, or when the third party is performing services on behalf of the company and, where required, has agreed to non-disclosure.

Our Standards

- We will treat our customers with dignity and respect, and strive to provide superior customer service.
- We will only use the information we receive about our customers for legitimate DTE Energy business purposes.
- We will only access a customer account, record, or report when we have an authorized business or emergency response purpose for doing so.



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- We will strictly adhere to any applicable laws or regulations governing information sharing among DTE Energy companies.

Shareholders

Shareholders, as owners of our company, expect regular cash dividends and increases in the value of their shares. To meet this obligation to our shareholders, we are committed to earning an acceptable return by properly utilizing the company's human and physical resources and prudently managing costs.

Our Standards

- We will treat our shareholders with dignity and respect.
- We will comply with the Securities and Exchange Commission and applicable stock exchange rules, DTE Energy internal controls, and other regulations related to stock transfers and other transactions, which include rules related to insider trading.

Suppliers and Vendors

DTE Energy suppliers, consultants, agents, and other representatives are important to our overall success and, as such, are considered valued business partners. We can ensure that we receive fair and competitive prices and quality services by maintaining our objectivity in their selection and by building relationships based upon integrity and trust. We retain good suppliers by showing them the consideration we wish to be shown ourselves.

Our Standards

- We will review and follow company sourcing and related policies and seek appropriate guidance before engaging a supplier, consultant, agent, or other representative.
- We will ensure that the company has a written agreement defining the exact nature of the relationship with a consultant.
- We will work with our suppliers, consultants, agents, and other representatives to ensure that they act in a manner consistent with our company values, business conduct standards, and any applicable laws and regulations and policies while conducting our business.

Entertainment, Gifts and Gratuities

The occasional exchange of business courtesies such as modest gifts, meals and entertainment is a common practice meant to create goodwill and establish trust in business relationships. Such courtesies must not adversely affect our objectivity and decision making, nor should we use this practice to place undue influence on our customers, suppliers, or business partners.

The occasional exchange of entertainment that is moderate and gifts of nominal value (\$75 or less) may be appropriate.



DTE Energy Way

Our Standards

- We will not solicit for personal gain any entertainment, gifts, or gratuities from anyone with whom we do business.
- When involved in bidding or the placement of a contract or purchase order, we are prohibited from accepting entertainment, gifts, or gratuities that could influence, or be perceived to influence, our purchasing decisions. Ordinary business meals are acceptable if they are part of a business meeting.
- We will strive to know our customers' policies concerning their acceptance of business courtesies and, once known, will ensure our offers do not compromise their standards.
- We will communicate our standards regarding business courtesies to our suppliers in a timely manner.
- When we have business dealings with government officials, we will know and abide by both their standards and ours for exchanging business courtesies.
- We will accurately disclose to our leader when we receive gifts or entertainment, beyond normal business meals, from our suppliers, customers, competitors, or joint venture partners.

Entertainment

Acceptable forms of entertainment include infrequent, moderate hospitality such as meals, charity events, sporting events, holiday gatherings or other celebrations, gift baskets, plays, concerts, or other cultural events.

Unacceptable forms of entertainment include gambling expenses or sexually explicit entertainment.

There may be instances where a customer or supplier has arranged for payment of expenses incurred by an employee for attending a conference, meeting, or event that they sponsor. Where it is impractical for the customer or supplier to bill the employee or accept payment from the employee, the expenses may be covered by the customer or supplier with appropriate documentation by the employee and approval from the appropriate officer.

Our Standards

- If there is any question about the appropriate level of entertainment, we will seek authorization from our leader before offering or accepting the invitation.
- We will only offer or accept entertainment that is infrequent, modest, is offered or accepted in the normal course of an existing business relationship, and is not meant to improperly influence our decisions and actions or those of our business partners.
- To avoid any real or perceived obligation, the entertainment we offer or accept should be reciprocated with similar modest hospitality.



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Gifts

Examples of acceptable gifts include those that are non-monetary and nominal (\$75 or less) in value, often distributed during the holidays, such as food baskets, flowers, fruit, books, or similar property.

Giving or receiving gifts such as money or other items of cash value, loans, special privileges, personal favors, benefits, services, and any other payment or favor that may be considered a bribe or kickback is prohibited.

Our Standards

- We may only give gifts that promote goodwill with our business partners, and are not meant to improperly influence their decisions and actions.
- We will politely return any gifts that exceed these standards with an explanation that company standards do not permit us to accept such gifts. Food baskets may be donated to a non-profit organization if there are no perishable items in it or they may be distributed among an entire organization with management approval.
- We will not solicit, accept, or offer improper gifts or payments. We will ensure that we do not inadvertently suggest that we would accept such improper gifts or payments. Such payments or gifts may be considered bribery, which violates DTE Energy policy as well as United States law.

Fair Competition

DTE Energy is committed to vigorous and lawful competition that is based upon the merits of our products and services. We seek to maintain the trust of our customers, suppliers and competitors by conducting business in a fair and ethical manner. DTE Energy's activities are also governed by federal and state laws and regulations. We each have a responsibility for knowing company standards and the changing laws that may have an impact on our individual work activities.

Our Standards

- We will never directly or indirectly discuss, agree, or contract with competitors to fix prices, allocate markets, divide up customers, or otherwise restrict competition.
- We will promote our own products and services through fair and accurate comparisons with our competitors.
- We will not engage in industrial espionage, sabotage, or bribery.
- We will be accurate and truthful when representing the quality, performance, features, and availability of products and services in conversations, advertising, and other public communications.
- We will accept a customer's decision to buy a competitor's product, and continue to provide the same level of quality service with any other products we supply the customer.



DTE Energy Way

Competitive Information

It is proper for us to gather information about the marketplace, including information about our competitors and their products and services. We also want to compete fairly and to avoid even the appearance of improper agreements and understandings. Therefore, we will act in accordance with applicable laws and accepted ethical industry practices regarding gathering competitive data.

Our Standards

- We will never misrepresent our identities when gathering competitive information. We will strive to ensure any outside entities that we work with or employ will accurately represent themselves when seeking competitive information on our behalf.
- We will never attempt to acquire a competitor's trade secrets or other proprietary information through unlawful means, such as theft, spying, or breach of a competitor's non-disclosure agreement by a customer or other party.

Government

Our dealings with government personnel are important to our continued success, whether they are customers of ours or serving in other capacities. We want to avoid the appearance of impropriety when dealing with government agencies, officials, and employees. Failure to do so may expose not only the government employee to fines and penalties, but DTE Energy and its employees as well.

In addition, we have a special obligation to know the laws, regulations, and ethical standards of the various branches of federal, state, and local governments that may be more stringent than those that apply to our non-government customers and suppliers. In our dealings with government personnel, we should establish working relationships based on integrity, mutual respect, trust, and our ethical standards.

Our Standards

- We will familiarize ourselves with the standards of conduct, whether required by law or not, for all government interactions.
- We will not give government employees, public officials, or members of a public official's immediate family any preferential treatment for business transactions.
- We will present facts and opinions that are consistent with our knowledge and understanding when testifying to a DTE Energy position in regulatory proceedings.
- We will comply with federal and state regulations governing lobbying activities.
- DTE Energy will cooperate with government health and safety officials in their reviews of company facilities and operations. If approached by anyone requesting such a review, immediately contact your local safety or legal organization for assistance.



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Environmental Protection

At DTE Energy, we believe in more than just the delivery of safe, reliable, and economical energy products and services. We also have a commitment to enhance the quality of life for today's society and generations of the future.

Because we feel passionately about preserving the earth's natural resources, environmental stewardship is at the heart of our commitment. Environmental stewardship includes operating our power plants, service facilities, natural gas compressor facilities, and equipment in a manner that complies with governmental standards and is protective of our employees and surrounding communities. Further, we will surpass regulatory requirements where economically practical and beneficial. We continue to support reasonable voluntary initiatives to better our environment at our locations and in the communities we serve.

We also sponsor educational and business partnerships that support the desire of people to live in harmony with the environment. We recognize that our moral and ethical responsibilities to protect the environment extend beyond the boundaries of our region and we will pursue opportunities to achieve global sustainability. We will keep our customers, shareholders, and communities informed about our environmental protection activities.

We will sustain our commitment to environmental stewardship by integrating environmental considerations into planning and decision making, conducting regular reviews of operations to identify further improvements, and training employees on how to conduct their activities in an environmentally responsible manner.

Our Standards

- We will follow environmental procedures when using equipment or performing business operations.
- We will report to our environmental group any conditions that could be considered unsafe or otherwise pose a threat to our environment, health or safety (for example, spills or leaks). We will report any unresolved concerns to Environmental Management and Resources.
- We will cooperate with government and regulatory officials regarding environmental inquiries or inspections, and promptly notify legal, our environment group, or a local person authorized to deal with these matters.



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Definitions

When used in the DTE Energy Way, these terms are defined as follows:

Affiliate	(i) Any DTE Energy subsidiary that is under common control with another DTE subsidiary, or (ii) any corporation, partnership, joint venture, limited liability company, trust or other entity of which (or in which) DTE Energy or any of its other direct or indirect subsidiaries has less than a majority direct or indirect ownership, interest or control.
Company business	Any lawful act within the scope of that individual's assigned job duties performed at the request of, or on behalf of, the company by which the individual is employed.
Company policy	Any policy, practice, or other type of policy document issued by DTE Energy or any of its subsidiaries.
Company property	Property provided by the company for business purposes, such as offices, plants, parking lots, club facilities, and land. Company property also includes, but is not limited to, equipment, supplies, records, data, and other items used to conduct company business.
Company time	Time spent conducting company business.
Company vehicle	Vehicles provided by the company for conducting company business, such as cars, trucks, and other motorized vehicles.
Employee	Employee of DTE Energy or its subsidiaries. Does not include contract workers.
Leader	The person to whom you report, also known as your supervisor or formal leader.
Management	The head of your organization, typically known as directors or managers.
Officer	An elected or appointed officer of DTE Energy or one of its subsidiaries, typically known as vice presidents and above.
Subsidiary	Any corporation, partnership, joint venture, limited liability company, trust or other entity of which (or in which) DTE Energy or any of its other subsidiaries has more than a 50 percent direct or indirect ownership, interest, or control.
We	All of us as a group, and each of us as individuals. May also mean leaders specifically, based on the meaning of a statement.