



# **DTE Energy Policy**

## **OP10 Corporate Political Participation**

Revision 0  
February 22, 2008

### **1. Applicability**

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

### **2. Policy**

#### **A. General**

1. DTE Energy is committed to being a responsible corporate citizen and to complying with all applicable laws.
2. As an energy company, we are affected each day by the decisions of federal, state and local officials. DTE Energy is an active participant in the political process and encourages its employees to participate in the process.

#### **B. Corporate Contributions**

1. DTE Energy may use corporate funds only for legally permissible contributions to political organizations for initiatives that support the goals and business objectives of the Company. Such contributions are generally made only upon a specific request from such an organization.
2. DTE Energy will comply with all applicable laws governing its legally permissible corporate contributions to political organizations.
3. Under no circumstances may any employee make a corporate commitment of Company resources for a political contribution or expenditure, either cash or non-cash, without the approval of the Vice President, Corporate & Government Affairs. DTE Energy will not reimburse any employee for a political contribution or expenditure.

### **C. Political Action Committee**

1. We encourage our employees to become informed about the policy matters affecting DTE Energy and to be involved in the political process. DTE Energy facilitates this participation through the DTE Energy Political Action Committee (PAC).
2. As prescribed in its bylaws, the DTE Energy PAC is required to comply with all relevant laws governing its participation in the political process.
3. The DTE Energy PAC is funded by voluntary contributions from eligible employees with lawful administrative support from DTE Energy.
4. DTE Energy PAC contributions are guided by a steering committee comprised of PAC members elected by all PAC members. The following criteria are used in evaluating requests for contributions:
  - a. Public integrity of the candidate
  - b. Leadership position or committee service
  - c. Representation of a district that includes a DTE Energy facility or service area
  - d. General support on issues important to the Company
  - e. Financial need

### **D. Trade Associations**

1. DTE Energy belongs to a number of trade associations that participate in the political process. DTE Energy may not always agree with positions taken by these organizations.
2. DTE Energy will request that trade associations to which our dues or payments are significant provide a breakdown of the portion of our dues or payments that were used for political contributions. This information will be included in the annual report of PAC and Political Activities presented to the Public Responsibility Committee of the DTE Energy Board of Directors.

### **E. Disclosure**

1. The Company's political activities will be reviewed annually by the Public Responsibility Committee of the DTE Energy Board of Directors. Such an oversight process provides for greater accountability and transparency for the Company's corporate political activities.

2. To promote transparency for shareholders, DTE Energy will annually post on a publicly available DTE Energy Internet site the following information:
  - a. A copy of the DTE Energy Policy OP10, Corporate Political Participation.
  - b. Links to the Internet sites of the Federal Election Commission and Michigan Bureau of Elections, which provide information about contributions from the DTE Energy PAC to candidates.
  - c. The amount of DTE Energy corporate contributions to organizations that may lawfully receive corporate funds for political activities.
3. DTE Energy reserves the right to keep confidential proprietary or competitively sensitive information consistent with required disclosures.

#### **F. Responsibility**

1. The Vice President, Corporate & Government Affairs is responsible for approving contributions to political organizations.
2. The Public Policy organization within Corporate & Government Affairs is responsible for maintaining records of PAC contributions for 7 years and for compliance involving reporting and disclosure of political contributions and involvement.

#### **3. Sources**

- A. DTE Energy Way References:

<http://dteenergy.com/pdfs/dteEnergyWay.pdf>

- B. DTE Energy Corporate Political Participation Internet Web Site

#### **4. Implementation Plan**

- A. Accountable Officer: Vice President, Corporate and Government Affairs

B. Effective Date: February 22, 2008

C. Targeted Audience: All employees of DTE Energy and its subsidiaries.

D. Rationale Issuance: New policy.

E. Communication Plan:

A LeaderNote and DTE Daily will be published announcing the new policy.

F. Sustainability Plan:

On a biennial basis, the policy will be reviewed by the policy subject matter expert, working with the Corporate Secretary's office.