

# **DTE Energy Policy OP-10 Corporate Political Participation**

Revision 1.2

August 7, 2023

## **1. Applicability**

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

## **2. Policy**

### **A. General**

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

### **B. Corporate Contributions**

1. DTE Energy may use corporate treasury funds only for legally permissible contributions to political organizations for initiatives that support the goals and business objectives of the Company. Such contributions are generally made only upon a specific request from such an organization.
2. DTE Energy will comply with all applicable laws governing its legally permissible corporate contributions to political organizations. Federal and Michigan law strictly prohibits the direct contribution of corporate treasury funds to candidates running for federal and state and local offices in Michigan or to their campaign committees. We do not make independent political expenditures with corporate treasury funds. For DTE's purposes, independent expenditures, as defined by the Federal Election Commission, are funds expended by the company to directly support or defeat a candidate.
3. Under no circumstances may any employee make a commitment of corporate resources for a political contribution or in-kind expenditure, without the approval of the Vice President, Corporate & Government Affairs. DTE Energy will not reimburse any employee for a political contribution or expenditure.

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

5. DTE will make contributions, using corporate treasury funds, to 527 organizations, Super PACs, Ballot Question Committees, and 501(c)4 social welfare organizations. All annual corporate contributions to these organizations will be disclosed in accordance with section E of this policy.

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

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

#### C. Political Action Committee

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

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

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

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

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

5. All annual PAC contributions will be disclosed in accordance with section E of this policy.

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

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

2. DTE Energy will request that these organizations to which our dues or payments are significant provide a summary of the portion of our dues or payments that were used for lobbying or political contributions. 3. All trade association and chamber payments will be disclosed in accordance with section E of this policy.

#### E. Disclosure<sup>1</sup>

1. DTE Energy will voluntarily disclose PAC and corporate contributions, including 501(c)(6), 501(c)(4), 527 organizations, Super PACs, Ballot Question Committees, and PAC contributions.

2. These contributions will be reviewed annually by the Public Policy and Responsibility Committee of the DTE Energy Board of Directors, which is comprised of independent directors. Such an oversight process provides for greater accountability and transparency for the Company's corporate political activities. To promote transparency for shareholders, DTE Energy will annually post on a publicly available DTE Energy internet site the following information:

a. Copy of the DTE Energy Policy OP-10 - Corporate Political Participation

b. Annual list of all candidates and organizations receiving PAC contributions and the amount of contributions. Links to the Internet sites of the Federal Election Commission and Michigan Bureau of Elections, which provide information about contributions from the DTE Energy PAC

c. Annual itemized list of corporate contributions made to 501(c)(6), 501(c)(4), 527 organizations, Super PACs, and Ballot Question Committees that are more than \$5,000 in aggregate per calendar year. All contributions to these organizations below \$5,000 will be disclosed in an aggregated summary line item.

d. For trade associations and chambers of commerce, the portion of dues utilized for lobbying and political activities by organizations receiving \$5,000 in aggregate or more per calendar year.

f. DTE Energy will make available on its website an online archive of this information for the prior year and additional preceding four-year period. Information will be updated annually by October 1<sup>st</sup> for the year prior ending on August 31<sup>st</sup>.

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

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<sup>1</sup>This policy reflects the settlement reached in DTE Electric's Integrated Resource Plan (Case No. U-21193). Beginning in October 2024, DTE will implement the enhanced disclosures outlined in the settlement agreement, specifically the \$5,000 itemized threshold for disclosure of corporate contributions, payments to trades associations and chamber of commerce and include contributions to 501(c)(3) non-profit organizations. These reports will include all donations made by DTE and subsidiaries which total \$5,000 or more in the aggregate annually.

## F. Responsibility

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

### 3. Sources

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

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

Last Reviewed: August 1, 2023

1. Per DTE Electric's Integrated Resource Plan (Case No. U-21193) settlement, beginning in October 2024, the annual public disclosure will include contributions to 501(c)(3) non-profit organizations. The report will include all donations made by DTE and subsidiaries to 501(c)(3) entities which total \$5,000 or more in the aggregate annually.