The Company We Keep
The CMS Energy Code of Conduct

A message from Patti Poppe
President and Chief Executive Officer

OUR COMPANY takes pride in doing more than what is simply required. It is reflected in our Triple Bottom Line – People, Planet and Profit – which drives how we make decisions as a company every day.

However, company decisions aren’t just made by the top leaders. As the employees who keep the lights on and furnaces running for Michigan, you each are making hundreds of decisions every day – and more often than not choose to do the right thing.

Our culture is driven by our Purpose – CMS Energy: World Class Performance Delivering Hometown Service. It reflects our commitment to care for others and behave respectfully to those we encounter. We believe ownership and empowerment result in teams that are both agile and deliberate. Together, we create an environment where all can work safely, feel proud and thrive.

This Code of Conduct helps you interpret our policies and navigate challenging situations, and ultimately guides the decisions you make each day.

Thank you for all you do to hold yourselves to the highest standards and make CMS Energy such an incredible company.

Patti Poppe
Dear EnerBank USA Employees:

I’m pleased to introduce the EnerBank USA Code of Conduct.

As you know, up until recently, we have followed the Code of Conduct of our parent company, CMS Energy Corporation. The CMS Energy Code of Conduct has helped shape the way EnerBank conducts its business as a good corporate citizen. This updated EnerBank Code of Conduct continues in this tradition and, while more specifically tailored to the unique role of EnerBank within the CMS Energy family of companies, incorporates all of the fundamental aspects of the CMS Energy Code of Conduct.

Ethical behavior has always been and will always be an important part of who we are at EnerBank. This EnerBank Code of Conduct is an excellent tool to help us understand the types of behaviors expected by EnerBank management, employees, its board of directors and its parent company.

Sincerely,

Charlie Knadler
President & CEO of EnerBank USA
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YOUR ROLE

This Code of Conduct and Guide to Ethical Business Behavior is jointly administered by the company’s Legal & Compliance Department and the Compliance Department of our parent company, CMS Energy Corporation. As used in this code “company” means EnerBank USA.

The Code of Conduct cannot anticipate and address every ethical situation you may encounter on the job. It is simply a guide to understanding our policies and culture. You are empowered and encouraged to use good judgment and ask if you do not know how to handle a situation. This guide outlines expectations of all employees, with leaders owning additional responsibility for demonstrating ethical behavior and decision making.

Employees should know, understand and follow the regulations, laws and policies that apply to their jobs. They also must report concerns or potential misconduct.

Supervisors, Managers and Directors must set a strong ethical example as leaders, make sure their team members understand and follow the rules and create a positive and inclusive work environment that encourages employees to speak up about concerns.

Corporate Officers must demonstrate a strong ‘tone from the top,’ uphold all of the guidance outlined and honor any additional duties and obligations that accompany their respective positions.

All of us have responsibility to:

- **Protect Our Reputation**: We each have the ability to enhance or harm the company’s reputation. Your individual behaviors and actions can be viewed as reflections of our company, to the public and within the company.

- **Understand Our Company’s Guidelines**: You are responsible for familiarizing yourself with the rules, policies and laws that govern our business, especially those that apply to your specific job. Your direct supervisor, a Human Resources representative or the Legal and Compliance Department or CMS Energy Legal and Compliance Office are always available if you have questions. Employees who commit violations — as well as those who are aware of violations but fail to report them — are subject to the full range of disciplinary action, up to and including termination.

- **Report Concerns**: You are responsible for reporting concerns and suspected ethical, legal or regulatory violations, including self-reporting if you make an error in judgment. It takes courage to speak up, and we will protect those who choose to stand up and do the right thing. We have a “zero tolerance” policy on retaliation against employees who report concerns in good faith. Concerns can be reported anonymously by contacting the Legal and Compliance Department or CMS Energy Legal and Compliance Office at 800-CMS-5212, 517-788-6260, 866-ETHICS-P or cmscompliance@cmsenergy.
DECISION TEST

The Code of Conduct is a general guide to our culture, ethical standards and policies. When you encounter situations that pose potential conflicts of interest or raise other ethical issues, ask yourself and others:

1. Is it legal?
2. Does it align with our standards as written?
3. Is it fundamentally fair and honest?
4. Would I feel comfortable if the details of the situation were published or broadcast in the news media or became known to my friends and co-workers?

If you answered NO to any of these questions, seek guidance by contacting the Legal and Compliance Department or CMS Energy Legal and Compliance Office at CMSCOMPLIANCE@CMSENERGY.COM or at 800-CMS-5212 or 517-788-6260.
Situations will arise when you need clarification or more information to make the right decision. In those cases, answers are easily accessible. You have a variety of resources to learn more about our rules and policies:

- Talk with your supervisor or Human Resources representative.
- Contact the Legal and Compliance Department or CMS Energy Legal and Compliance Office at cmscompliance@cmsenergy.com or at 800-CMS-5212 or 517-788-6260.
FAQ: Can I solicit for my child’s fundraiser?

You may sell items for your children’s fundraiser passively. This means you can set the flyers/forms out in a non-work area or discuss before/after working hours. Please do not directly ask employees or send emails related to the fundraiser.

FAQ: Do I need to vape in designated smoking areas?

Yes. Vaping is considered a form of smoking and must be done in designated areas.

CARING

We embody care, love and joy with our employees, customers and work.

Caring means we look out for the well-being of those we interact with each day. We listen to understand, behave respectfully and make time in our busy days to demonstrate appreciation. Care provides the safe, supportive environment we all seek and deserve.
KEEPING OUR EMPLOYEES, customers and the general public safe and secure is our top priority. No business goal or service commitment justifies endangering a person’s safety, health or life. Whether your office is a desk, truck or piece of land, you can expect a workplace free of violence, threats, weapons, drugs and alcohol.

We invest in the tools, equipment and training needed to perform your job safely at all times. Of course, creating the safest possible work environment requires ownership from you as well. You are required to follow all safety and security processes, including all policies and procedures outlined in company safety, security and operating manuals and policies. You also have a responsibility to promptly report unsafe behavior and working conditions, safety hazards, property damage and personal injuries.

VIOLENCE

We will not tolerate threats or acts of violence committed by or against employees. We will investigate all reported incidents promptly; take appropriate disciplinary action, up to and including termination; and support criminal prosecution, if appropriate. We will provide educational programs and offer counseling and support to victims of crimes on the job. You are expected to engage in a manner that is not threatening or harmful.

SUBSTANCE ABUSE

We are committed to keeping the workplace free from the effects of substance abuse. Employees are expected to fulfill all duties and conduct company business without using alcohol, illicit drugs or controlled substances illegally.

Drug and alcohol testing is required in compliance with federal, state and company policies. If you’re taking prescription medication that may place yourself or others at risk of harm, you must notify your supervisor, who should contact Human Resources to determine appropriate next steps.

We provide free, confidential assistance for a number of personal or professional issues, including substance abuse, through our third-party service GuidanceResources®. Human Resources can provide GuidanceResources® contact information, or you can find details on iConnect.

- Drugs: In accordance with state and federal laws and regulations, including the Drug-Free Workplace Act of 1988, we prohibit the unlawful manufacture, distribution, dispensation, possession or use of controlled substances in the workplace. This includes marijuana, even if consumed legally. Violations may subject employees to discipline up to and including termination.

- Alcohol: We prohibit alcoholic beverages on company property, during work hours or on call when being paid by the company, or during a meal period when scheduled to return to work. Employees must not report for work — call-out or scheduled assignments — under the influence of alcohol.

FAQ: I’m having a holiday party for my team. Can my employees drink alcohol?

Please contact the Legal and Compliance Department to discuss specifics of your event and any policy implications.

The fitness for duty standard applies to any company events where alcohol may be served. Be mindful of safety obligations and ensure employees are not driving while intoxicated. The use of alcohol is not an excuse for engaging in behavior that constitutes misconduct.

Possessing or transporting alcohol on company property, is generally prohibited. Alcohol may be stored in personal vehicles on company property provided that the original seal has not been broken. You also may not drive any company vehicle under the influence of drugs or alcohol, for any reason. Violations may subject co-workers to discipline up to and including termination. Exceptions to our alcohol policy include: the South Haven Conference Center, where alcohol is permitted and may be consumed during designated bar operation hours, and utilizing a bartender for controlled pour; property leased by co-workers through co-worker led clubs; and other officer-approved events. Sealed alcohol may be brought onto company property for gifts or recognition purposes.

WEAPONS

All weapons are prohibited on company property. Examples include registered or unregistered firearms, knives with blades exceeding three inches unless used as a company-issued tool, explosives, ammunition, pellet guns, paintball guns, tasers, bows, arrows and swords.

Violations may subject employees to discipline up to and including discharge.

Exceptions to our weapons policy include: law enforcement, armored truck services personnel in support of company customer payment offices, security officials performing their normal duties, and the use of firearms or explosives for industrial or animal control purposes. Kitchen knives are allowed on company property for the purpose of food preparation.

The Chief Compliance Officer, in consultation with the bank security officer, may approve exceptions to the weapons policy.
BE FAIR & RESPECTFUL

BEING FAIR AND RESPECTFUL doesn’t mean taking a cookie cutter approach to interacting with each other – it means we appreciate the individuality of our employees and customers. We make every effort to ensure everyone we encounter has the ability to express themselves authentically, and we listen to learn and understand as we welcome new people to our circle. We treat each other with fairness, honesty and respect.

EQUAL EMPLOYMENT OPPORTUNITY

We do not tolerate discrimination of any kind, including based on age, sex, race, religion, creed, color, national origin, ancestry, height, weight, marital status, sexual orientation, gender identity, disability or covered veteran status. This policy applies to all aspects of employment on the job, and applies to benefits to the extent required by law. Further, we will not terminate or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their pay or the pay of another employee or applicant.

However, those who have access to the compensation information of other employees or applicants as a part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) of an investigation, proceeding, hearing, or action, or (c) consistent with our legal duty to provide information.

CMS Energy is a federal contractor and has affirmative action plans per the terms of Executive Order 11246, Vietnam Era Veterans Readjustment Assistance Act, and Section 503 of the Rehabilitation Act and will recruit, hire, train and promote persons in all job titles and ensure other personnel actions are administered without regard to disability, veteran status, race or gender. Employees and applicants will not be subjected to harassment, intimidation, threats, coercion or discrimination because they have engaged or may engage in filing a complaint, assisting in an investigation, or other activity related to the administration of these regulations, opposing any act made unlawful by these regulations or exercising any other protection of these regulations. The full affirmative action program is available to any employee upon request.

RELIGIOUS NONDISCRIMINATION

We respect the religious beliefs and practices of all employees. Harassment or discrimination based on sincerely held religious beliefs or practices is absolutely prohibited. We will make, on request, an accommodation for religious beliefs and practices when a reasonable accommodation is available that does not create an undue hardship for our business.
FAIR LENDING

It is our policy to comply with the letter and spirit of all of the applicable fair lending laws. Bias or prejudice formulated on a prohibited basis, including race, color, religion, national origin, sex, marital status, age (provided the applicant has the capacity to contract), the applicant’s receipt of income derived from any public assistance program, and the applicant’s exercise, in good faith, of any right under the Consumer Credit Protection Act, shall have no part in the promotion, granting, or administration of credit. All employees are responsible for identifying and eliminating potential discrimination in all lending activities. The company will make credit products available to all applicants on a consistent and fair basis, without discrimination.

HARASSMENT

We expect employees to be professional and respectful, avoiding behaviors, including recordings and postings on social media, that create an intimidating, harmful, hostile or offensive work environment. Harassment is defined as any unwelcome comment or physical contact based on a person’s age, sex, race, religion, creed, color, national origin, ancestry, height, weight, marital status, sexual orientation, gender identity, disability or covered veteran status that rises to such a level as to significantly affect an individual’s employment, interferes with an individual’s work performance or creates an intimidating, hostile or offensive work environment.

A romantic or sexual relationship and/or activity between leaders and their employees within the same chain of command is strictly prohibited.

- Sexual Harassment: Conduct of a sexual nature that explicitly or implicitly affects an individual’s employment, is unreasonable, interferes with an individual’s work performance or creates an intimidating, hostile or offensive work environment. Leaders are prohibited from entering into any settlement agreement for behaviors related to a sexual harassment concern. Only the General Counsel, in consultation with the Board of Directors, has the authority to enter into a settlement agreement related to a sexual harassment concern.

IS IT RETALIATION OR NOT?

Retaliation is negative action on an employee for engaging in a protected activity, such as filing for workers compensation or reporting an ethics or compliance concern.

Retaliation MAY include:
- Rewards or performance reviews varying from the norm
- Unequal assignments or scheduling with peers
- False reports of violations
- Public criticism or sarcasm about performance
- Terminations or demotions not related to performance

Retaliation ISN’T:
- Fair and accurate performance review or coaching
- Giving merit reflective of performance
- Changing assignments, shifts or assigned work locations when warranted
Racial or National Origin Harassment: Conduct related to a person’s race or national origin that interferes with an individual’s work performance or creates an intimidating, hostile or offensive work environment.

**DISCRIMINATION**

Discriminatory practices include harassment on the basis of a person’s age, sex, race, religion, creed, color, national origin, ancestry, height, weight, marital status, sexual orientation, gender identity, disability or covered veteran status; retaliation against an individual for filing a charge of discrimination, participating in an investigation, or opposing discriminatory practices; employment decisions based on stereotypes or assumptions about the abilities, traits, or performance of individuals of a certain sex, race, age, religion, or ethnic group, or individuals with disabilities; and denying employment opportunities to a person because of marriage to, or association with, an individual of a particular race, religion, national origin, or an individual with a disability.

We will not discriminate against qualified individuals with disabilities, disabled veterans and protected veterans. We will take affirmative action to hire and advance the employment of each of those groups. If you qualify and would like to tell us, please do so by contacting your Human Resources representative. Providing this information is voluntary.

**DISABILITY ACCOMMODATION**

In compliance with the Americans with Disabilities Act, Section 503 of the Rehabilitation Act and the Vietnam Era Veterans Readjustment Assistance Act, we intend to offer reasonable accommodation to employees and applicants to assist in the successful performance of the essential job functions or in completing the application process.

You can request consideration for reasonable accommodation by contacting your Human Resources representative. Applicants can do so online during the application process. We will consider requests individually to determine the most effective solution and whether it would create an undue hardship for our business. Most cases involve review of appropriate medical documentation, which is treated confidentially.
EMPOWERED

EMPOWERED employees are able to make decisions that drive service and enable extraordinary experiences. We trust that our teammates will make the right choices along the way and seek assistance when faced with challenges. New and better ideas come from those closest to the work and the efforts to bring them to life are supported by leadership along the way.
CONFLICT OF INTEREST exists when there is a choice between acting in your personal interests or the interests of the company.

You are expected to report potential or perceived conflicts of interest to the Legal and Compliance Department.

Avoiding conflicts of interest includes refraining from company-related actions or favors with friends and family and refraining from presenting or accepting gifts that cross ethical boundaries or violate the Bank Bribery Act.

FDIC policy guidelines on the Bank Bribery Act define activities determined to be acceptable business practices. In accordance with the guidelines, directors, officers or employees of the company should not solicit for themselves or for a third party (other than the company), demand, accept or agree to accept anything of value for personal benefit from anyone in return for any business, service or confidential information of the institution.

This does not include:

a. Acceptance of gifts, gratuities, amenities or favors based on obvious family or personal relationships (such as those with the partners, children or spouse of a bank official) when the circumstances make it clear that it is those relationships, rather than the business of the company that are the motivating factors.

b. Acceptance of meals, refreshments, travel arrangements, accommodations or entertainment (all of reasonable value) in the course of a meeting or other occasion, the purpose of which is to hold bona fide business discussions or to foster better business relations, provided the expense would be paid for by the company as a reasonable business expense, if not paid for by another party.

c. Acceptance of freestanding entertainment to foster better business relations but only to the extent the strategic partner or vendor makes similar types of entertainment opportunities available to other entities in the ordinary course of business.

d. Acceptance of loans from other financial institutions on customary terms to finance proper and usual activities such as home mortgage loans, except where prohibited by law and provided there are no tie-in provisions.

e. Acceptance of advertising or promotional material of reasonable value such as pens, pencils, note pads, key chains and calendars.

f. Acceptance of discounts or rebates on merchandise or services that do not exceed those available to other customers.

g. Acceptance of gifts of reasonable value related to commonly recognized events or occasions, such as a promotion, new job, wedding, retirement, or holiday celebrations.

h. Acceptance of civic, charitable, social, educational or religious organizational awards for recognition of service and accomplishment for work not done on company time or not as a result of one’s position with the company. (Any fees or honorariums received based on one’s position with the company should be turned over to the company).

FAQ:
A vendor I work with sends alcohol as a gift, what do I do?

If you receive alcohol as a gift, don’t panic. You are permitted to keep sealed alcohol received as a gift (or intended as a gift) on company property provided it remains unopened and is removed as soon as reasonably possible. Also, alcohol may be stored in personal vehicles on company property provided that the original seal has not been broken. Provisions of the conflicts of interest policy also apply.

FAQ:
A third-party vendor asked me to speak at a conference and has offered to pay for my airfare and hotel. Can I accept?

Trips (gifts involving travel expenses and sponsored events combined with business purposes paid for by a third party), are limited to $5,000 value and require the Third Party Paid Trip or Sponsored Event Approval Form. This form needs approval from your supervisor and the Chief Compliance Officer and must be completed in advance of your trip.

FAQ:
I am on a company trip. Can I expense alcohol while I am on this trip?

When traveling for the company – such as attending a conference – consuming reasonable amounts of alcohol and expensing it after working hours is acceptable. However, you should not consume alcohol during work time.
**WHAT IS A GIFT?**

A “gift” is anything of value, such as meals or lodging, paid for by a third party and not billed to the company. Other common examples include entertainment; vendor or supplier trips; paid admission to sporting events or concerts; transportation costs; and discounts, special privileges and advantages not available to the general public.

**VALUE OF GIFT** | **APPROVALS REQUIRED**
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Gifts with fair market value less than $200 | No approval required; must comply with general requirements of this policy.
Gifts with fair market value between $200 and $500 | Written or email approval required by supervisor with notice to the Legal and Compliance Department before the gift is accepted. If impractical under the circumstances, approval must be obtained shortly after the gift is received or accepted. Supervisor and team member are required to keep records of all approvals. The records should be kept until disclosed on the annual disclosure questionnaire or for two years.
Gifts with fair market value greater than $500 | Must be pre-approved in writing by supervisor and Chief Compliance Officer.
Trips and sponsored events* | Advance approval is required. Employees must complete and submit the form available from the Legal and Compliance Department. Trips and sponsored events should not exceed $5,000 per trip/event from all sources.

*Note: Trips and sponsored events are not included in the $2,000 annual gift acceptance amount.

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* Trips are defined as gifts involving travel expenses (transportation, meals and/or lodging). Sponsored events are defined as activities (golf events, sporting events, etc.) combined with business meetings or other business purposes paid for by a third party.
### SHOULD I ACCEPT THE GIFT?

**Is it appropriate?**
- If you answered YES to any of these, do not accept the gift!
  - Are you uncomfortable with co-workers knowing?
  - Are you in active negotiations with the giver?
  - Could it be interpreted as questionable, controversial or negatively impacting our reputation?
  - Is something expected in return?

**Is it of reasonable value?**
- If you answered NO to any of these, you’re probably OK!
  - Is it excessive for the giver or receiver?
  - Is the value more than $200?
  - Is it an excluded gift type, like a solicited gift, cash or cash equivalent?

**Does it require pre-approval?**
- Remember, you cannot accept gifts exceeding more than $2,000 annually!
  - Above $200? - Written approval required.
  - More than $500? - Written pre-approval required.

Trips are subject to a different acceptance threshold and have more restrictive approval requirements.
FINANCIAL INVESTMENTS

Putting your money into program sponsors, independent contractor division contractors, and companies that are competitors, vendors or suppliers to the company could create a conflict or a risk of embarrassment to the company, depending upon the amount and the specific circumstances of the investment. Employees and their immediate family members are not permitted to invest in program sponsors or their contractors, independent contractor division contractors, strategic business partners, competitors, or their affiliated companies. Investments in mutual funds that have investments in those entities are permitted. Contact the Legal and Compliance Department if you are unsure whether you are permitted to invest in a particular entity.

Employees should not invest in companies for which they have procurement or credit risk review or approval responsibilities. Likewise, employees should not leverage their position with the company or use information they access in their jobs to make investments.

PRIVATE BUSINESS

Participating in a private business — as an owner, investor, employee or another role — could create a conflict or interfere with your work for the company. Employees who are participating in or have an outside relationship with a private business should consult with the Legal and Compliance Department or the CMS Energy Compliance Department to ensure they will avoid conflicts of interest.

OUTSIDE EMPLOYMENT

You may work outside the company with manager approval but must do so on your time. Conflicts occur when using the company’s equipment, assets or name. Outside employment also could create potential legal liability for the company.

Employees who engage in outside work in their area of expertise for the company must obtain written approval from their manager and the Chief Compliance Officer and take extra care to avoid creating a perception of the company’s involvement. Employees must not indicate that any outside work performed is done on behalf of the company.

You may not work for program sponsors or their contractors, independent contractor division contractors, competitors, strategic business partners, vendors or borrowers or use company assets to support outside work.
AGILITY

We anticipate change and create new solutions.

It’s been said the world has never changed this fast before, and will never change so slowly again. This requires us to have the flexibility to adjust quickly to our customers’, investors’ and the planet’s needs. As we make changes, we are mindful and inclusive of impacted employees. We seek feedback and use that information to work better. And while we are agile in our thinking and reactions, we still adhere to the policies and procedures that keep us safe and secure.
I am frustrated about the progress on my project, and I’m angry at my employees. Can I blog about this when I get home from work?

We all get frustrated, and many turn to social media as an outlet. While we cannot control what you post on your personal channels, it is important to remember that regardless of the disclaimers you put on your social media profiles people will identify you with the company. While you might be angry in the moment, you should ask yourself if blogging about the situation is worth your personal and professional reputation. In addition, publishing anything online that gives away confidential or privileged information IS strictly against our policies. It is also important to remember that it doesn’t matter if you are online or offline, harassing, defaming or threatening employees in any way is also clearly out-of-bounds.

As representatives of the company, we have great responsibility to do the right thing. We are stewards of the planet and our company’s reputation. As the world around us evolves, we respond in a timely and appropriate manner by leveraging our Triple Bottom Line.

Environment

The company is committed to protecting and enhancing the environment. That means engaging in sound environmental practices, supporting environmental stewardship, and continually evaluating and minimizing the impact on our natural surroundings.

You must stay informed and engaged in protecting the environment and follow all relevant environmental laws and regulations. Doing so enables the company to successfully balance the energy and economic needs of customers with the protection of the environment. To help ensure a healthy environment, we all must:

- Comply with all environmental laws and regulations.
- Understand the environmental impact of our business.
- Provide adequate resources to meet our environmental commitments and obligations.
- Operate according to sustainable business best practices.
- Encourage cost-effective ways to prevent pollution and reuse and recycle materials.
- Identify and weigh environmental risks.
- Encourage environmental protection and stewardship.
- Work with environmental agencies to resolve environmental issues.
- Continuously improve our environmental performance and corporate social responsibility.
- Effectively communicate our environmental values.

Social Media

You have a responsibility to conduct yourself appropriately and respectfully when using social media, whether at work or on personal time. These standards apply regardless of whether you’re using company-provided equipment and networks or a personal device. A few examples of inappropriate use include sharing confidential or proprietary information, harassing colleagues or customers, or engaging in illegal behavior. Leaders may impose more restrictive limits to the use of social media in the workplace to the extent allowed by law. See the company’s Social Media Guidelines for additional detail.

FAQ: I am frustrated about the progress on my project, and I’m angry at my employees. Can I blog about this when I get home from work?

We all get frustrated, and many turn to social media as an outlet. While we cannot control what you post on your personal channels, it is important to remember that regardless of the disclaimers you put on your social media profiles people will identify you with the company. While you might be angry in the moment, you should ask yourself if blogging about the situation is worth your personal and professional reputation. In addition, publishing anything online that gives away confidential or privileged information IS strictly against our policies. It is also important to remember that it doesn’t matter if you are online or offline, harassing, defaming or threatening employees in any way is also clearly out-of-bounds.
Am I responsible for keeping a total of all gifts received – even those that do not require approval – each year to ensure they do not exceed the annual limit?

Yes. Employees are responsible for maintaining a running total of items received to ensure they do not exceed the annual limit.
WE PRIORITIZE, plan and execute in accordance with our standards and legal requirements in a world-class way.

These standards, policies and procedures help guide our work in a safe and compliant manner. They ensure consistent, predictable world-class performance. So much of our success depends on our ability to do what we say, when and how we say we will do it. While we give our employees the freedom to take extra steps to do more than what is required, we are appreciative of a strong foundation to guide us in our day-to-day activities.
BE MINDFUL

OUR EMPLOYEES are exposed to sensitive information and are provided valuable tools and resources to do our jobs. We have a duty to understand the guidelines in place to protect the data and assets entrusted to us, and also be conscious of how our actions may compromise them.

COMPANY ASSETS, INCLUDING INTERNET AND EMAIL

You are responsible for protecting company assets — such as information, business records, funds, equipment, supplies, facilities, property and materials — and using them in a safe and efficient manner and in accordance with applicable laws and regulations.

Assets are intended primarily for business purposes, including computer systems, the Internet, intranet, email, faxes, telephones, cell phones and voice mail. Limited personal use is permitted as long as it’s appropriate and does not violate company policies or applicable laws. Your supervisor may establish additional limits on your personal use of company assets.

You may not access websites that contain sexually explicit or pornographic materials and/or are otherwise prohibited by company policies. You may not use email to send obscene, profane or harassing messages; conduct outside employment or private business activities; or to create or forward junk mail/spam. Use caution when opening links or attachments, and report suspected phishing to Security.

Your use may be monitored and reviewed by the company at any time without specific notice to or authorization from you. Users of company assets shall have no expectation of privacy. The company’s employees are also required to comply with the company’s Acceptable Use of Bank Resources Procedure. See the Acceptable Use of Bank Resources Procedure for additional detail.

CONFIDENTIALITY AND PRIVACY

The information gathered, processed and stored for use in providing consumer products is one of the company’s most valuable assets. Any compromise in the security, confidentiality or integrity of this information constitutes a breach of consumer trust, laws and regulations and negatively impacts the reputation and revenues of the company. The company maintains a comprehensive written Information Security Program consistent with the standards set forth in the Federal Deposit Insurance Act and the Gramm-Leach-Bliley Act. All employees of the company are required to abide by the standards of the Information Security Program appropriate to their job function and scope of their activities within the institution. Any violation of the standards will result in appropriate disciplinary action, which may include immediate termination.

You are responsible for protecting confidential and sensitive information, which includes anything that could potentially be used to place our company, employees, customers or shareholders at a disadvantage. Examples include:

- Plans, strategies, tactics or organizational structure not announced to the public.
- Financial data or operations results not announced to the public.
- Personal employee information, including addresses, phone numbers, salaries, benefits information, performance evaluations, Social Security numbers, personal health information and disciplinary records.
- Information protected under a confidentiality agreement or contract.
- Information identified as confidential by a supervisor or officer.
- Customer and shareholder records such as billing records, credit reporting scores, personal information and Social Security numbers.
- Payment or credit card information.

You should treat information as sensitive unless demonstrated otherwise. Exceptions include communication of the information that is consistent with your normal job duties or if you are authorized to disclose it by your supervisor and the Chief Compliance Officer. If you are uncertain whether to disclose information or become aware of disclosed confidential information, consult your supervisor, Security or Legal and Compliance Department or the Chief Compliance Officer.
COLLECTING DATA

We know that working with data enables us to improve the way we serve our customers and employees. As stewards of data, we also are mindful that it represents real people. So we consider the ethical collection and use of our customers’ and employees’ data, including using data fairly and without bias, to be an important responsibility.

Those working with customer and employee data are expected to adhere to and promote these principles:

- **Follow the Rules** – Abide by all laws, rules, policies and regulations associated with the use of data.
- **Be Considerate** – Respect the persons behind the data.
- **Exercise Care** – Do not use data in a manner that is already prohibited by law or the Code such as to harass or discriminate.

As our use of data expands, contact the Information Security Officer or Chief Compliance Officer with questions or concerns related to data use. And always be mindful to immediately report concerns if data is collected, used, released, or discarded in questionable ways.

INTELLECTUAL PROPERTY

Any new development or invention that relates to your work for the company is considered company-related and must be disclosed immediately to your supervisor or the Legal and Compliance Department. This includes new apparatus, process or design, improvements of existing inventions or designs, or other useful ideas, including but not limited to computer systems design and software and engineering designs or processes.

If you do not believe a development or invention is company-related, you must still disclose it and allow the company to make a determination. If you file a patent application or have a patent application filed on your behalf for a company-related development or invention, even if you leave the company, you must inform the Legal and Compliance Department and assign it to the company.

FINANCIAL CONTROLS

We maintain a system of internal controls designed to safeguard our assets, ensure accurate recording of transactions, and prepare reliable financial statements as defined by regulatory and governmental agencies. The Chief Executive Officer and Chief Financial Officer have the final responsibility to ensure accurate financial reporting and pursuant to the Federal Deposit Insurance Corporation Improvements Act of 1991. Internal control activities include:

- **Entity-level reviews** – management review of reports comparing actual performance versus plans, goals and established objectives.
- **Authorization of transactions** – review of particular transactions by an appropriate person.
- **Segregation of duties** – separating authorization, custody and record-keeping roles to limit risk of fraud or error by one person.
- **IT security** – password usage and access logs to ensure access is restricted appropriately to authorized personnel.
- **Controls over financial reporting** – designed to meet the financial statement assertions of existence or occurrence, rights and obligations, valuation and measurement, completeness and presentation and disclosure.

FAQ:

**May I use the Internet while at work for personal reasons?**

Limited personal use is permitted while at work, as long as it’s appropriate and does not violate other company policies and is used in a safe and secure manner. All Internet and company asset policies apply.

**May I use my company email for non-business email exchanges?**

Limited personal use is permitted. However, you may not use email to send obscene, profane or harassing messages; conduct outside employment or private business activities; or to create or forward junk mail/spam.

**Can I take my laptop on vacation?**

Employees are generally permitted to take company assets on vacation.

You may retain all rights to any new developments or inventions that are not company related; however, if developed using company time and/or resources, then the company will automatically be given a perpetual royalty-free shop right to use the development or invention.

Copyright materials made during employment shall be considered "works made for hire" and title will be vested to the company.

You may not copy, distribute, publish, nor derive a copyrighted work of a third party without the express written consent of the third party; doing otherwise may violate the copyright laws. Ask for clarification and guidance from the Legal and Compliance Department.

Supervisors have the responsibility to ensure effective internal controls in their areas are followed. You are responsible for executing, monitoring and reporting on the effectiveness of internal controls specific to your job. Deviations from documented internal controls should be shared with the Chief Compliance Officer or Chief Financial Officer.

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MANAGING INFORMATION

You are responsible for following policies related to the collection, maintenance, storage and — where appropriate — destruction of business records.

Business records are any form of information created, gathered or used by employees, contractors or vendors related to company operations or decisions that need to be maintained for (a) operational (integral to business operations but has no legal requirement) or (b) legal (including regulatory, accounting, audit and tax) purposes in accordance with a specified and approved retention period.

Retention periods for business records must be followed, regardless of the media (paper, electronic, microfilm, etc.).

As necessary, the Legal Department may place a hold on the destruction of records, which applies to both business and non-business records, and you must comply with it.
BE AWARE

THERE ARE A NUMBER of external factors that can compromise our business. It is our employees’ responsibility to understand the laws and regulations that govern our company and others. When in doubt, always ask.

CORPORATE RISK
CMS Energy has a corporate risk policy that all employees are required to comply with, and it is the policy of CMS to foster open and transparent risk management processes. If any employee believes that EnerBank faces risks that have not been adequately identified or assessed, he or she should contact their manager or supervisor to report their concerns.

CMS’s risk policy governs five areas: enterprise, market, credit, insurance and new business development risks. While EnerBank has a risk management policy that specifically addresses EnerBank’s business operations, the enterprise risk section of the CMS policy is applicable to EnerBank. As such, any employee who participates in decisions regarding the enterprise risk section of the CMS policy is responsible for understanding and, where appropriate, complying with the provisions in those sections.

REGULATORY REQUIREMENTS
We are regulated by a wide variety of state and federal agencies, including the Federal Deposit Insurance Corporation (FDIC) and the Utah Department of Financial Institutions (UDFI). You must stay informed about and follow all applicable laws and regulations relevant to our business and your individual job. Information provided to regulators must be complete and accurate. You also must report suspected violations or misconduct to your immediate supervisor and the Chief Compliance Officer. The Chief Compliance Officer will oversee investigations related to regulatory standards. The company will assign at least one person — either internal or external — to cooperate completely with the applicable regulatory agency to investigate and resolve the situation.

During an investigation, you must comply fully with internal and regulatory agency investigators.

SENSITIVE PAYMENTS
We are committed to conducting business in compliance with applicable anti-corruption laws. You may not make direct or indirect payments of any kind — including money, property or services — to any person to secure business or gain favorable business treatment.

Sensitive payments include bribes, kickbacks or other illegal or improper payments, or those incorrectly deducted from income taxes.
FOREIGN CORRUPT PRACTICES
You must comply with the Foreign Corrupt Practices Act, a federal law forbidding the corrupt influence of foreign officials. A “foreign official” is any officer or employee, or any persons acting in an official capacity for an officer or employee, of a foreign government, department, agency or public international organization. The law generally prohibits making or authorizing — or even offering to make or authorize — a payment or gift intended to corruptly influence a foreign official.

Contact the Chief Compliance Officer or General Counsel prior to making any decisions involving a foreign official, including plant or facility tours.

SOLICITATION
We restrict external entities and individuals from soliciting on company property and limit solicitation activities of employees. In general, you are allowed to solicit during work hours for events approved or sponsored by the company, including the United Way and Employees for Better Government. For more information or to determine whether an activity is appropriate, contact the Legal and Compliance Department.

ANTITRUST
We support a free, open and competitive marketplace by complying with all applicable antitrust laws. Antitrust laws are complex and difficult to apply and, in some cases, to companies with large market shares may face stricter rules than others in the market.

Violations can be extremely expensive and often carry potential criminal penalties in addition to civil fines or damages.

We will not use unfair means to gain or maintain market share in any product or service.

You should never discuss with competitors any agreement upon prices (even maximum prices), terms and conditions of service, credit terms or other matters that affect prices.

You should never discuss with competitors any agreement on allocation of markets, territories or customers on a geographic or other basis.

You should never discuss any group boycott (an agreement with outside companies not to deal with another company).

Trade associations perform useful and legitimate functions. They can also bring us together with competitors. You must not engage in any discussions or activities that may lead to the appearance of improper behavior. If such a discussion starts, make it clear you believe the discussion is improper and break away.

Consult the Legal and Compliance Department or CMS Energy Legal and Compliance Office:

- Before entering any joint venture, merger or other collaborative arrangement with competitors.
- Before establishing any exclusive dealing arrangement.
- Before bundling together different products or services.
- Before setting prices at which company products or services will be resold by others.
- Before exchanging information with competitors on matters which may be sensitive under the antitrust laws.
- Any time you are in doubt about whether an activity is lawful.

FAQ: My employee's child is extremely ill and they are struggling to pay bills. Can we take up a collection to help?

Absolutely. Exercising care for our employees is a core element of our culture. You may actively solicit to an appropriate audience, which includes direct requests, emails, flyers, etc.
Buying or selling “puts,” “calls,” “hedges” or other derivatives related to the company’s or an affiliate’s securities.

These restrictions do not apply to purchases made under “safe harbor” provisions of the Securities and Exchange Commission (SEC) rules.

**FAIR BUSINESS PRACTICES**

You may not falsify company documents such as work orders, status reports, time sheets, mileage logs or expense reports, and must ensure all reports provided to regulators are complete and accurate.

You may not capitalize on business information or opportunities that belong to the company. An employee, for example, may not buy or lease property upon learning CMS Energy is — or is likely to be — interested in acquiring it.

Lying or providing misleading information to gain a business advantage is prohibited, including “round-trip” trading with counterparties and providing inaccurate information to those who compile pricing indexes.

We are committed to fair disclosure of information to analysts or investors in compliance with all applicable securities laws. That includes the SEC’s Regulation Fair Disclosure, which prohibits us from disclosing material information to securities market professionals and investors unless the information is simultaneously disclosed to the public generally.

Directors, executive officers, those who own 5 percent or more of CMS Energy common stock and their family members must disclose deals that involve CMS Energy if the transaction is more than $10,000 and the related party will acquire a material interest. The audit committee of the CMS Energy board of directors must pre-approve these “related-party transactions” and the company must disclose any such deal involving more than $120,000 in its annual shareholder proxy statement. Consult the policy for full details, including an extended definition of applicable family members.
You should direct questions about related-party transactions to the general counsel, who initially determines whether the rules will apply to a business scenario.

**ENDORSEMENTS**

We will not endorse products or services or the firms or individuals who supply them. No one may use CMS Energy’s name or corporate logo for advertising or publicity purposes without obtaining prior written approval. Contact the Legal and Compliance Department for assistance with obtaining the necessary approvals.

**THIRD PARTY RISK MANAGEMENT AND RELATIONSHIP WITH STRATEGIC PARTNERS**

We have a Third Party Risk Management Policy governing the purchase of goods and services and relationships with third parties, including vendors and strategic partners. You must know and follow the policy relevant to your work.

**EMPLOYMENT OF RELATIVES**

You must exercise caution when hiring relatives, especially in the case of supervisory/subordinate relationships, to avoid real or perceived favoritism in the workplace. You may not be assigned under the direct supervision or in the chain of command of a relative unless approved in advance by the President & CEO or, if involving the President & CEO, the Board of Directors.

**FAQ:** I work closely with a contract company that requested a letter of recommendation and referral for a new client. Can I do so?

Our policy prohibits you from providing endorsements to vendors, contractors or suppliers. This includes letters of endorsement, references, testimonials on websites, presentations at conferences and articles in newsletters and other periodicals. If you are interested in providing an endorsement, please contact the Legal and Compliance Department to discuss the situation and steps to receive a policy exception.

**FAQ:** I just began an outside business and I believe the services it provides could really help my employees. Can I provide them a brochure from my new company?

No. This would violate our solicitation policy and could possibly be a conflict of interest as well.
REPORTING AN ISSUE

FAQ: I need to report an issue, but I want to remain anonymous. How can I report?

Employees can report concerns using our anonymous third-party reporting paths – 1-866-ETHICS-P or EthicsPoint.com. If an employee wants to report a concern anonymously but speak with someone from the compliance office, we will keep their identity confidential to the extent we are able.

FAQ: I fear retaliation if I report my concern. What do I do?

We understand that employees are reluctant to come forward because of fear of retaliation. Speaking up takes courage, so we want to make the decision to speak up as simple as possible. Retaliation against anyone who raises a concern or reports a violation in good faith may result in disciplinary action, up to and including termination of employment. Additionally, we have a proactive retaliation monitoring program and monitor employment actions like merits, pay increases, and performance reviews as well as employee perceptions of their work environment for unfair actions because of the reporting.

FAQ: Why is speaking up so important?

First of all, speaking up is always the right thing to do. It allows the company to timely address issues to protect our employees, our customers and our company. Second, speaking up ensures the company is aware of the issue. Often employees believe someone else must know and will address the issue. We rely 100% on employees to report concerns. If nobody knows there is an issue, then the issue will not be addressed.
OWNERSHIP

We hold ourselves personally accountable to exceed our employees', customers' and investors' expectations.

We have more of a stake in our company’s outcomes when we behave as owners. Not only do we all have pride in our goals and results, but we are motivated to make things better. We also proactively take action when something isn’t right, because we understand negativity has long-term repercussions.
BE BRAVE

SPEAKING UP is important to our company’s success. Our culture encourages everybody to be brave and professionally voice their views and concerns.

From time to time, we all have concerns that can be easily resolved; however, at times they are about breaches of the law, serious misconduct by another person, health and safety, harassment or discrimination. In these moments, it can be difficult to know what to do.

Even though it’s not easy, speaking up is always the right thing. We are proud of those who speak up because it shows we care about having a trusting, open and transparent culture. Often, it’s the only way we know something is wrong. It’s up to each of us to preserve and strengthen our ethical culture and to create a positive and respectful work environment.

EXAMPLES OF CONCERNS

Any violation of law, noncompliance with a regulatory requirement or obligation, or a violation of company policy or the Code of Conduct should always be reported:

- Improper tracking/reporting of accounting records
- Fraud
- Theft (energy or asset) or embezzlement
- Violence or threat
- Discrimination or harassment
- Sexual harassment
- Bullying
- Falsification of records
- Regulatory noncompliance
- Misuse of company systems or property

- Sabotage or vandalism
- Unsafe working conditions
- Substance abuse
- Kickbacks or bribes
- Conflicts of interest
- Hazing
- Retaliation
- Aberrant behavior
**Employee Expectations**

You are expected to speak up and report conduct that you, in good faith, believe violates a law, rule, regulation, company policy or the Code of Conduct. In doing so, you are generally protected by a variety of federal and state “whistleblower” laws designed to shield employees from termination, disciplinary action or discrimination as a result of speaking up in good faith.

We’re each responsible for understanding the requirements that apply to our direct job responsibilities. You are expected to speak up if:

- You are unsure about the proper course of action and need advice.
- You are unsure about the meaning or application of a policy or regulation.
- You believe another’s actions on behalf of the company violate a law, rule, regulation, company policy or our Code of Conduct.
- You believe that you may have been involved in misconduct while working for the company.

**Leader Expectations**

It’s critical that you create a work environment where employees know they can be brave.

Be available to help with questions and concerns and don’t retaliate – directly or indirectly – or tolerate retaliation against anyone who reports in good faith or cooperates with an investigation.

Employees have been instructed to relay concerns of suspected misconduct to their supervisor. Leaders are expected to reinforce the value of this policy and take all concerns seriously.

Report issues to your Human Resources representative, Corporate Security or the Legal and Compliance Department as appropriate.

Monitor work of third parties under your supervision, such as consultants and contractors, and address and report observed misconduct.

**Zero Tolerance for Retaliation**

We want to make the decision to speak up as simple as possible. Anyone retaliating against a employee who raises a concern or reports a violation in good faith may receive disciplinary action, up to and including termination. Discouraging employees from reporting, asking them to lie directly or withholding information also is misconduct.

We take claims of retaliation very seriously. Those who speak up benefit from our retaliation monitoring program, which protects those who speak up after allegations are made and investigations completed. The program is designed to protect both employees and leaders from potential harm.

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**Modeling the Way**

- **Be Brave**
- **Be Informed**
- **Be Fair and Respectful**
- **Be Honest**
- **Be Mindful**
- **Be Deliberate**
- **Be Aware**
- **Be Safe**
ARMS YOURSELF with the information needed to be successful in your job and get help when you need extra support.

CONTACTS

Employees can report ethics and compliance concerns to their supervisors. If you are uncomfortable reporting to your supervisor, you may report your concern to one of the following designated areas:

- Human Resources
- CMS Corporate Director of Employee Relations and Equal Employment Opportunity (EEO)
- Your supervisor’s supervisor or department head
- In addition, employees may contact the Legal and Compliance Department or CMS Energy Compliance Office directly to report any concern or question.

- CMS Internal Compliance HelpLine: 800-CMS-5212 (800-267-5212)
  Email: cmscompliance@cmsenergy.com
- Legal & Compliance Department: 801-736-0320
  nfellows@enerbankusa.com
- CMS Third-Party Anonymous HelpLine: 866-ETHICSP (866-384-4277)
  Website: ethicspoint.com
- EnerBank Third-Party Anonymous HelpLine: 855-319-8479

COMPANY

For the purposes of this code, the term “company” means EnerBank USA.

AUTHORITY

In the case of a conflict or discrepancy between the Code of Conduct and the company’s corporate policies and procedures, the language contained in the policies and procedures shall controlling and prevail over the Code of Conduct.

WAIVERS AND EXCEPTIONS

Only the Board of Directors may grant policy waivers and exceptions to the policies contained within this code. The President & CEO may grant waivers and exceptions to any requirements contained in this code for employees if, in his or her judgment, (i) the decision maintains the spirit and integrity of the Code of Conduct and Guide to Ethical Business Behavior, and (ii) the waiver or exception does not result in a violation of any applicable company policy. Any waivers or exceptions granted to any senior officer or director shall be promptly reported to the CMS Energy Chief Compliance Officer.

MODIFICATIONS AND CHANGES

No officer, manager, director or supervisor may change any policy contained within this code, orally or otherwise.

DISCIPLINE AND PENALTIES

Violating company policies can lead to a range of possible disciplinary actions, up to and including termination of employment. Supervisors may face disciplinary action if they fail to take corrective action against employees who commit violations. They also may face disciplinary action if employees who commit violations have not been adequately instructed in the existence or importance of company policies.

The Chief Compliance Officer must be made aware of all disciplinary action resulting from violations and maintains the right of approval.

If you are terminated because of a violation, you forfeit all severance benefits unless there is a written agreement to the contrary. We will thoroughly investigate potential violations. During an investigation, the Chief Compliance Officer maintains the right to obtain information from a range of sources, such as:

- Employees
- Family members of employees living in the same household
- Vendors
- Suppliers
- Executive officers

The Chief Compliance Officer may, at any time, ask you to verify that you understand and are complying with company policies. All employees are required to cooperate with compliance investigations.

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Most concerns can be worked out amongst employees, but sometimes concerns need to be investigated because they violate company policy. Here's what that high-level process looks like.
One Company

One Purpose

One Culture

WORLD CLASS PERFORMANCE
DELIVERING
HOMETOWN SERVICE

The Company We Keep