

Program Effectiveness Research

CMS ENERGY

- 1. "High performers who violate our code of conduct or values are tolerated."
- 2. "Managers in my organization sometimes act as if they are above the rules."
- 3. "Our employees trust that their leaders consistently make values-based decisions."
- "Employees in my company feel pressured to achieve immediate objectives, even if it means acting in ways that are inconsistent with our values."
- "Employees in my company hesitate to speak up/out during team meetings because they worry about how their managers will react."
- 6. "Employees in my company question decisions when they conflict with our values."
- 7. " Employees in my company do the right thing, even if it's not in their personal best interest."
- "Employees in my company are comfortable skipping levels or going to a level above their direct boss to raise ethical concerns."

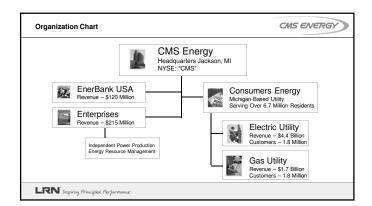
LRN' Inspiring Principled Performance

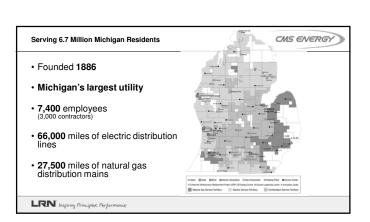
	Holds leaders accountable for ethical behavior	Promotes ethics wit prompting	hout	Models values-based behavior	Engage the Chie E&C Off while m strategion decision	ef licer aking c	Considers managers' eti behavior for performance reviews and a prerequisite fo promotion	ıs a	Holds leaders accountable for owning E&C in their business areas	
A&B	85%	67%		73%	58%		51%		62%	
D&F	53%	40%		61%	43%		42%		49%	
ur middl	e managers	clearly k	now	they are ac	counta	ble for				
	Assessing E8 for their busing and teams			ely supporting &C program		odeling va havior	alues-based	with	aling effectively in E&C concerns and by their teams	
A&B	74%	74% 83%			73	73%			%	
D&F	48%		63%			1%		54	0/	

THE TIME FOR BUILDING RELATIONSHIPS IS NOT IN THE MIDDLE OF A CRISIS MOBILIZE YOUR LEADERS TODAY. TOMORROW IS TOO LATE.

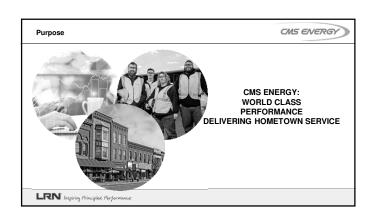
Accountability starts with Leaders: Develop the Front-Line Setting the tone of a speak-up culture within the company often starts with leaders. Employees report misdeeds 71% of the time when they believe top management is committed to ethics. Front-line management are the gatekeepers of culture. They are in the most INFLUENTIAL position to toster an environment for employees to raise concerns and speak out. 57% of people will go to their direct supervisor when they observe misconduct Do they LISTEN UP? Less than 2% of managers are formally trained around active listening Average manager interrupts employees within 17 seconds when someone is speaking.

LRN' Inspiring Principled Performance









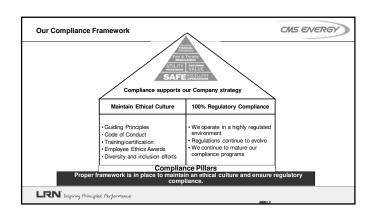
Guiding Principle	Belief	Behaviors & Practices								
We Act with Integrity	We believe integrity is a cornerstone of business success.	We place the heath and safely of ourselver, our families and our customers above all else. We below all laws, regulations and rules. We do not regit the govery fame. We do not regit the govery fame. We as a with the injects derice, transparency, and honestly. We are accurated for our words, actions and decisions.								
We Earn Our Customers' Business 24/7	We believe serving our neighbors, friends and family is an honor and privilege that must be earned every day.	We are mechanished and wish to stem continuers. We provide excellent service. We shall selficionally and orace than with customers. We shall selficionally and orace than with customers. We seep continuers and are stem formed. We seen continuer threatedors are strained additions to meet their needs. We seem contained retractions are strained additions to meet their needs. We anticipate or continuer threater receive. We anticipate or continuers where needs.								
We Cross the Finish Line Together	We believe success is achieved when we work together.	We use interactions as an opportunity to build relationaritips. We premote operations and instances, and apport change, We see the big picture and balances our own and beards interests with those of the larger organization. We see the big picture and balance our own and beards interests with those of the larger organization. We give our promoted best to the team. We give our promoted best to the team.								
We Put Points on the Board	We believe success depends on delivering meaningful results.	We add real and measurable value every day. We provide recognition and feedback based on results aligned with our principles. We behave as owners and act with urgency. We harbave six and learn time results.								
We Leave It Better Than We Found It	We believe lasting value is created through making improvements every day.	 We are molivated by the organization's greater purpose. We seek sustained suddies that meet the social economic and environmental needs of the stakeholders we serve. We continuously both for new and better ways to deliver stating value. We improve and us in-involvaly processed and systems that meet the needs of cultionners. We have the best tabelf and other our knowledge and experience to ensure success. We delive the "Contro to list "promise by whiting to learn every day. 								
t's a Great Place to Work	We believe in an environment where we can contribute our full potential.	We setted and sam trust. We Sten to undestinal, thest others with dignity and communicate operty. We support and coach each other. We support and roach each other. We high each ofter balance work and personal lives.								

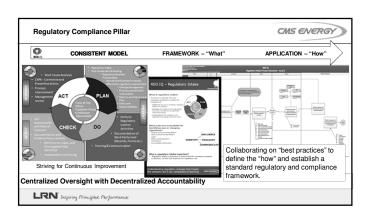
Compliance Office Responsibilities

- Reinforce a safe and strong ethical culture that embodies inclusiveness, respect, honesty and incorporation of the Guiding Principles.
- Ensure compliance with all laws and regulations applicable to our company.
- Create transparency to senior leaders and the board regarding compliance and misconduct risk.



LRN' Inspiring Principled Performance





		OVERALL PROGRAM MATURITY RISK SCORE = 3.1 Risk Performan								nce Trending				
		Catedory	Details	3	F	М	A	4 3	3	A	5 (N	D	Y1D A\a
		Trending Regulatory Performance	Violation of federal/state rule, requiring follow up or corrective action within 43 days	4	3		Ī	Ī		<	-	П		3.5
			People Most employees in the business unit are aware of their role in regulatory compilance. For the most special start straining and custifications exist the areas of the stapes private controls, or action and activationing sure in the semantic to the scale unit relative and activationing sure in the semantic to the scale unit relative and activation of the semantic to the scale unit relative accomplisation to entire a guidatory compilance. Place losses exist that is relative to complicate the called a guidatory compilance.	1)	1	-		1				ą
		Program Maturity	Framework exist to integer if a natical security compliance program. If guidatory but in nea activities in dualing roles and discount integer in the same dear of the compliance of the complian	4	4			T						4
EGEND) - 1.9	Red		Taching the second of the seco	2	3									2.5
2 - 3.4	Yellow	Regulatory Climate	A manage able level of regulatory scrutiny or political influence exists. The Company may have the ability to influence regulatory or political	3	3	П	T	Ť	T	Г	П	П	T	3

