

The logo for Consumers Energy features the company name in a bold, blue, italicized sans-serif font. The text is partially enclosed by a thick, green, curved swoosh that starts from the left and ends in a pointed tail on the right.

Consumers Energy

Count on Us

Threats & Acts of Violence Policy Training

***Consumers Energy Corporate Security
2012***

Consumers employee stabbed in robbery

Utility Worker Murdered for Cutting off Customer's Power

Jul. 4, 2012 at 3:11 AM

Worker shot: A Consumers Power Co. worker was shot at the company's main office this morning in an apparent domestic dispute, police said.

The woman was walking into a building at 3201 E. Court St. at about 7 a.m. when she was shot in a leg, apparently by a boyfriend of a relative, police said.

The motive for the shooting was unknown. Police were looking for the gunman.

Woman Pulls Gun To Prevent Smart Meter Installation

July 19, 2012

Updated: Tue 11:10 PM, Jun 26, 2012

Utility Worker Found Dead

Roberto Vazquez Used Medieval Weapon To Attack Utility Worker, New Jersey Cops Say

The Huffington Post | By Andy Campbell  
Posted: 04/27/2012 3:34 pm Updated: 04/27/2012 3:47 pm

Police: Man shoots Xcel worker

Posted: March 7, 2012 - 11:44am

Tuesday, March 8, 2011

North Carolina utility worker shot as he tried to turn woman's electricity off

**MichCon worker shot
as he tries to shut
gas service at home**

Utility worker found dead after a scheduled disconnect call

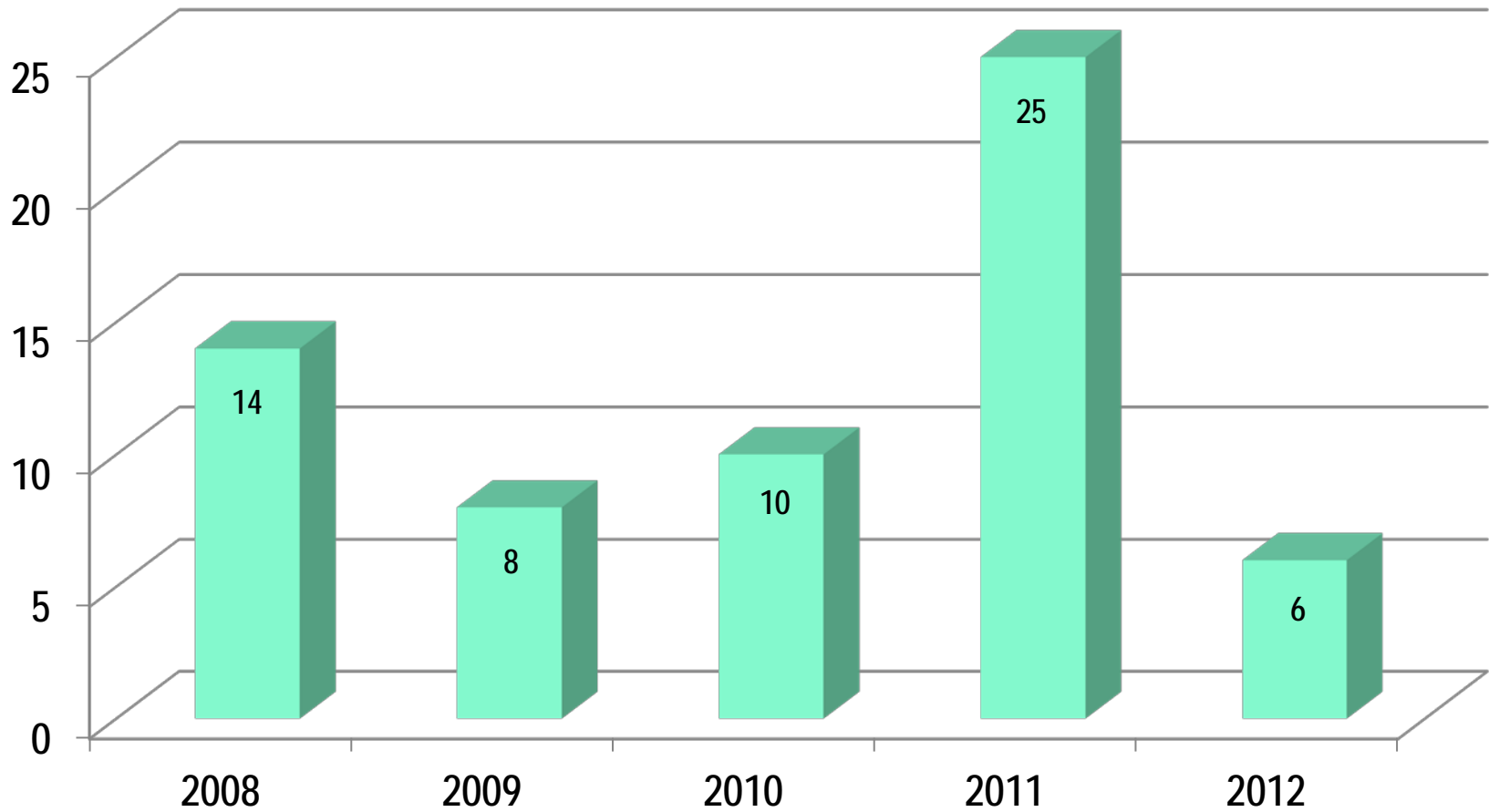
June 27, 2012

Violence Endangers Utility Workers : Crime: On-the-job safety for crews in some areas means dodging drug dealers and bullets. Sometimes, repairs are delayed.

Workplace Violence Examples

| Date | Incident | Individual Involved | Outcome |
|------------|---|---|---|
| 03.08.2011 | Woman shoots North Carolina utility worker in head with bb gun while he was attempting to turn off her power | Suspect: Andrea Griffa Gastonia, NC | 1 Injured Suspect charged with assault with deadly weapon |
| 12.16.2011 | Former Southern California Edison employee shoots 4 former co-workers; then himself | Shooter: Andre Turner Norco, CA | 3 Dead (including shooter) 2 Injured |
| 02.08.2012 | Atlantic City Electric employee attacked with a flail (a mace-like weapon) while trying to disconnect service | Suspect: Roberto Vasquez Hammonton, NJ | 1 Injured Suspect charged with attempted murder |
| 03.07.2012 | Excel Energy employee shot with rifle by customer after disconnecting customer's power | Suspect: Alfonso Albear Pampa, TX | 1 Injured Suspect charged with aggravated assault with a deadly weapon |
| 06.27.2012 | An employee for East Mississippi Electric Power Association was shot while on a scheduled disconnect call | Suspect: Keith Davis Quitman, Mississippi | 1 Dead Suspect charged with capital murder |
| 07.19.2012 | A woman pulls a gun on a CenterPoint Electric Energy worker to prevent installation of smart meter | Suspect: Thelma Taormina Harris County, TX | Legal charges pending |

Code of Conduct Related Threats



**2012 through 08.20

- The OSHA provision called the “General Duty Clause” has given OSHA the authority to investigate and cite an employer who has failed to respond to a threat of violence.

CMS ENERGY STRICTLY PROHIBITS EMPLOYEES FROM MAKING THREATS OR ENGAGING IN ANY ACTS OF VIOLENCE OR INTIMIDATION

It is the policy of CMS to provide a safe and secure work environment for its employees. To this end, the Company has instituted a “zero tolerance” policy as it relates to violence in the workplace. The Company will not tolerate acts of violence committed by or against employees.

- All reported incidents will be investigated promptly
- Employees are strictly prohibited from making threats or engaging in any acts of violence
- Violence prevention educational programs and procedures will be provided to employee
- Counseling will be provided to employees or their families, through the employee assistance program, for those who have become victims of a crime while on the job
- Employees who make threats or engage in acts of violence will be subject to discipline

Threats & Acts of Violence Policy (continued)

- Employees who make threats or engage in acts of violence will be subject to discipline approved by the Chief Compliance Officer.
- Where appropriate, the Company will support the criminal prosecution of individuals found by investigation to have unlawfully threatened or caused injury to an employee
- Reasonable assistance will be provided in dealing with the police and the judicial system, to employee crime victims who become involved with the criminal justice system as a result of their employment
- If there is an issue of personal safety or if an employee is confronted with violence or a threat of violence, the employee should immediately withdraw from the area, retreat to a secure location and report the incident to his/her supervisor and Corporate Security

Threats & Acts of Violence Policy *(continued)*

- Prohibited conduct includes, but is not limited to:
 - Injuring a person physically
 - Intentionally damaging property
 - Making threatening comments referring to the use of weapons in the work place
 - Engaging in behavior or making comments that create a reasonable fear of injury in another person
 - Possessing, brandishing or using a weapon while on the Company's premises or engaged in Company business
 - The Company's Threats & Acts of Violence Policy –



Adobe Acrobat
Document

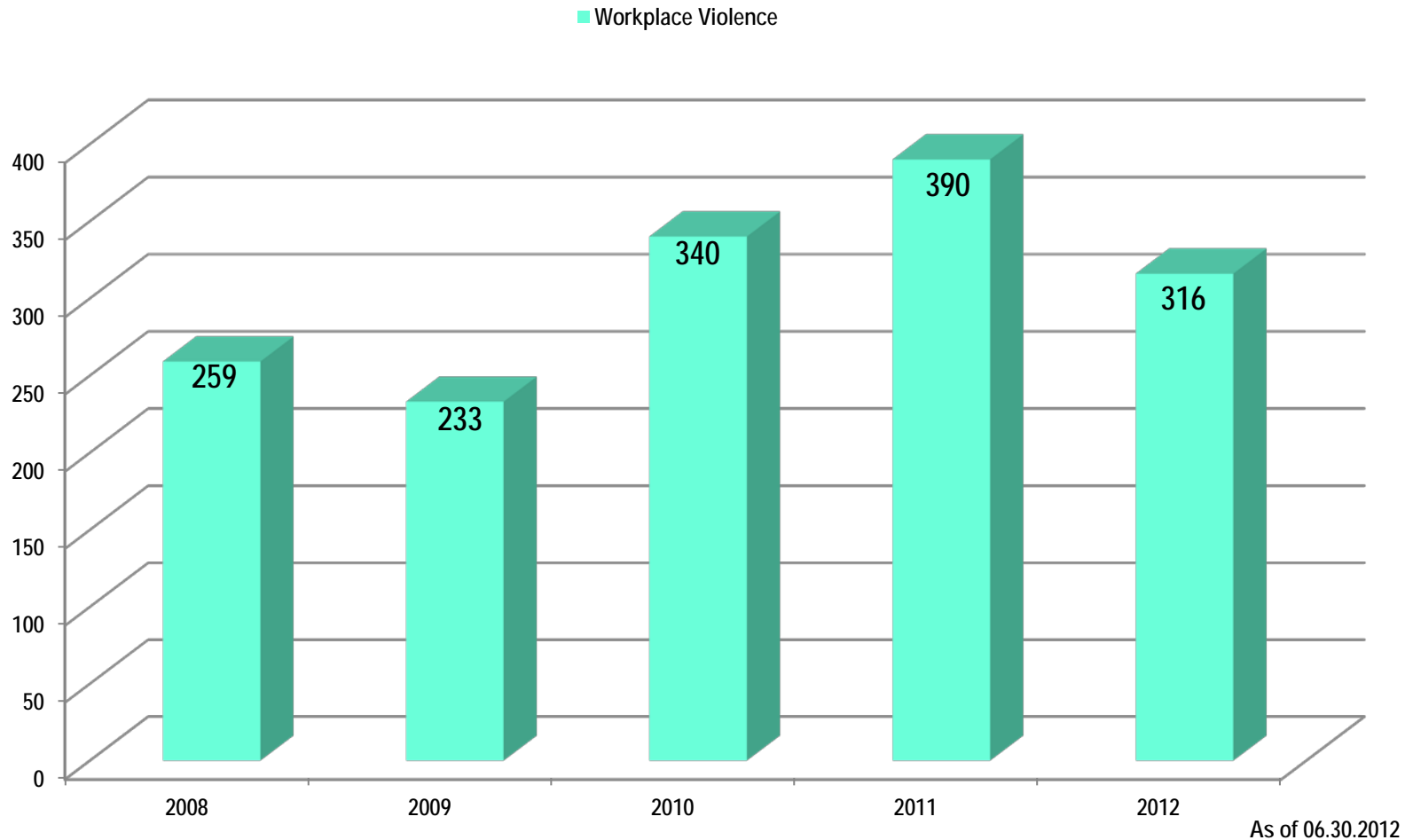
Definitions

- Threat:
 - An expression, either verbal or non-verbal, of an intent to cause physical harm.
- Assault (Act of Violence):
 - Aggression resulting in a physical assault with or without the use of a weapon; including a dog attack/bite
- Assault and Battery:
 - Actual contact by perpetrator (hitting, shoving, kicking)
- Harassment/Intimidation:
 - The act of someone creating a hostile work environment through unwelcome words, actions or contact not resulting in physical harm.
- Erratic Behavior:
 - Inappropriate behavior by customer without a threat.

Workplace Violence Facts

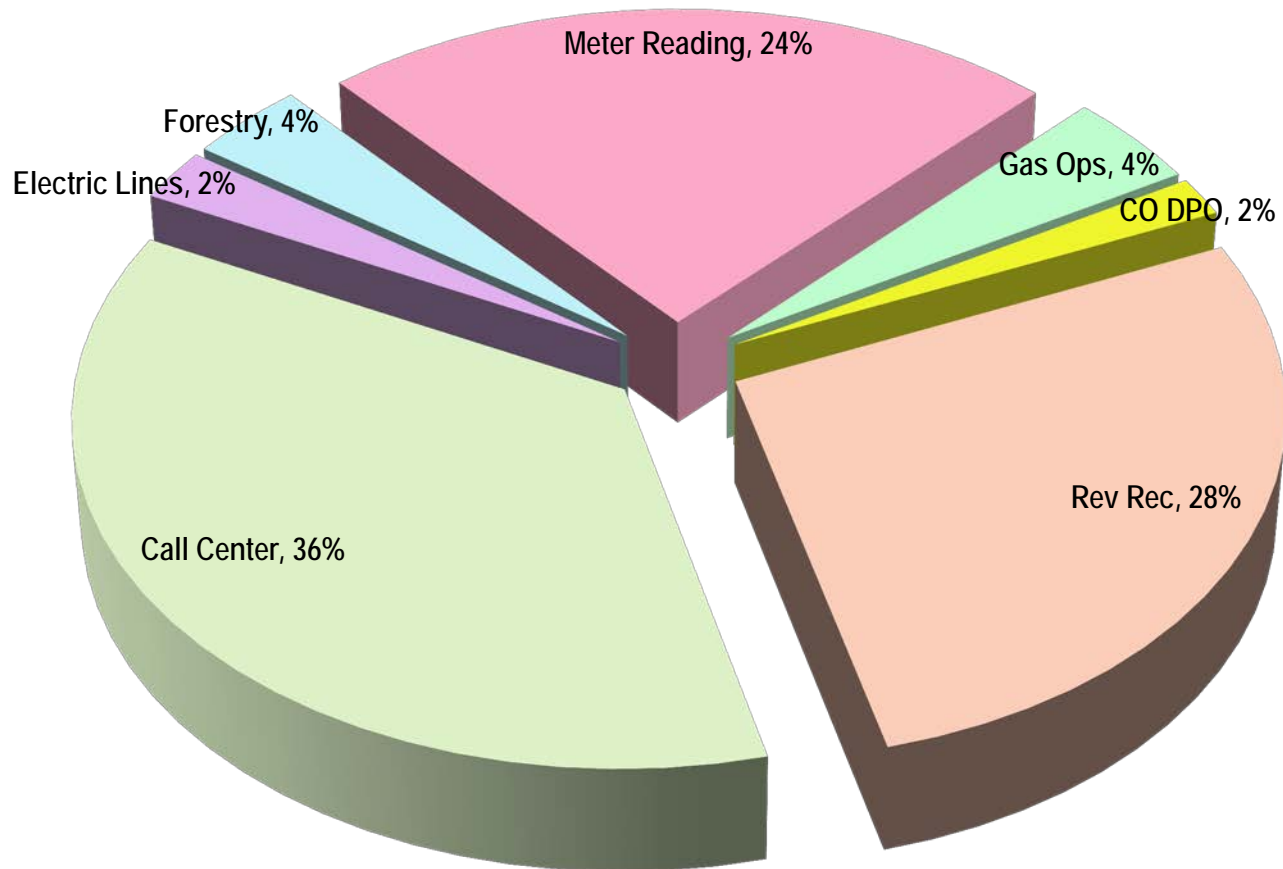
- Homicide is the second leading cause of death in the workplace
 - Annually, on average there are 700 homicides in America's workplace
- Homicide is the leading cause of workplace fatalities for women
- Job stress can be both cause and effect of workplace violence and harassment. Highly stressed workers experienced twice the rate of violence and harassment as less stressed employees. Threats of violence in the workplace were linked to higher employee burnout rates.
- The study conducted by A Society for Human Resource Management also found that verbal threats were the most common act of workplace violence reported.
- Each week in the United States, an average of 20 workers are murdered and 18,000 are assaulted while at work. These staggering figures should not be an accepted cost of doing business in our society—nor should death or injury be an inevitable result of one's chosen occupation.

Company Trends



- At Consumers Energy, we average over 300 incidents per year pertaining to threats, harassment, assaults and erratic behavior
- Over 2200 total incidents reported each year, including workplace violence, property crime, fraud and security incidents
- In 2011, reported TOVs against CE employees were up 13% from 2010.

Company Trends *(continued)*



Common Profiles Of Perpetrators

- Owns a weapon
- History of violence
- Has poor self-esteem
- Abuses alcohol or drugs
- Socially isolated; a loner
- Perceives injustice at work
- Blames others for problems
- History of interpersonal conflict
- Is angry, with no outlet for anger
- Symptoms of paranoia
- Lacks control under pressure
- Abruptly becomes introverted
- Exhibits self destructive behavior
- Raised in an abusive environment
- Fascination with military & weapons
- Has made threats directed at others
- Extreme interest in workplace violence news
- Involved in chronic labor-management disputes

Pre-Incident Indicators - - Co-workers

- Increased mood swings
- Depression and withdrawal
- Increased interest in weapons
- Escalation of domestic problems
- Has a plan to "solve all problems"
- Frequent, vague physical complaints
- Unexplained increase in absenteeism
- Behavior which is suspect of paranoia
- Repeated violations of company policies
- Noticeably unstable emotional responses
- Increased use of alcohol and/or illegal drugs
- Resistance to changes in procedures
- Abusive to co-workers and supervisors
- Empathy with people committing violence
- Situational Stressors (divorce, death, etc.)
- Fixation with previous incidents of violence
- Comments that indicate suicidal tendencies
- Fascination with violent movies or publications
- Outbursts of anger or rage without provocation
- Large withdrawals from or closing bank accounts
- Decrease in attention to appearance and hygiene

Predicting Imminent Danger: The Threat

- Face Red
 - Direct, prolonged eye contact
 - Head and shoulders back
 - Standing as tall as possible
 - Doesn't respect your "personal space"
 - Belligerent yelling, cursing, etc.
 - Pounding of fist, kicking at the floor or objects
 - Stops talking
 - Face White
 - Frowning
 - Excessive salivation
 - Breathing rapid, deep
 - Finger pointing
 - Hands pumping
 - Bobbing and/or rocking or stops all movement
 - No eye contact
 - Lips tighten over teeth
-
- **Final signal: Dropping of their center or lowering of the body**

During an Incident

- Stay Calm!
- Keep re-assessing the situation
 - Tell them what they want to hear
 - Stall for time
 - Distract and run
 - Scream
- Tell the assailant what you are doing
- If the assailant asks for money; give it to him
- Reassure assailant you will follow all instructions
- Make mental note of appearance, weapons, vehicle, route from scene

❖ **Physically resist only as a last resort**

After an Assault or Threat

1. Remove yourself from the threat
2. Call the police
3. Notify the Security Command Center (1-800-760-3295)
 - Corporate Security will notify your supervisor
4. Write down as much as you can remember
5. Protect evidence
6. Identify witnesses
7. Don't talk to media



❖ The Company will help with counseling if needed

Tips to Avoid an Assault

- Listen for unusual sounds
- Be aware of your surroundings
- Project the image of a confident person
- If you carry cash, carry a minimum amount
- Be courteous
 - **ALWAYS** have your Consumers ID visible
 - Wear Company logo gear/clothing
 - Place Company magnets on vehicles when applicable
 - Announce your presence; identify yourself
- If a situation seems dangerous, avoid it
- If you believe you are being followed
 - Cross the street, go to a public place or return to your vehicle
- Contact the Security Command Center (1-800-760-3295)
- Tell your supervisor

Vehicle Security

- Park in well lit areas
- Wear your safety vest
- Use all available lighting on vehicle
- **ALWAYS** lock vehicle when unattended
- While driving, watch for vehicles following you
- Park as close as possible to the job assignment
- Have keys in hand when returning to your vehicle
 - Check back seat
 - Look under vehicle
- Use vehicle flashers when stopped



Threat or Act of Violence Response

- Security Command Center (1-800-760-3295) has been contacted:
 - An incident report is initiated
 - A Corporate Security Field Investigator is contacted
 - The Field Investigator will contact the employee, supervisor, witnesses and law enforcement as required
 - The customer's account is coded and notification is sent to the field employees:
 - ZTHRT 42 – TOV
 - ZTHRTD 48 (Dog) – TOV-vicious dog (dog has bitten a person or equipment)
 - ZTHRTP 47 (Police Escort Required)
 - Code 40 – Aggressive Dog
 - Erratic Behavior

Threat or Act of Violence Response (continued)

- Notification is sent to the appropriate field operations so that they may inform employees working in the area
- Investigation is conducted; contact is made with the customer (or involved personnel)
- Investigation may involve law enforcement agencies, company investigators, Human Resources, Legal, local supervision, union officials, outside professional resources

Supervisor Responsibilities

- Upon receiving notification of a Threat of Violence of an employee under your immediate supervision:
 - Contact
 - Security Command Center
 - The employee
 - Make sure other employees are aware of TOV
- Assist employee victim to
 - Report and document incident
 - Assist with investigation as needed
- If appropriate, removal from workplace may be necessary
 - Due to emotional condition, protect employee victim or co-workers

NOTE: If you are a supervisor and not on the TOV notification list notify 'PO Box: TOV Notifications' to be added.

❖ Threats of Violence are taken very seriously

- Annual Threats of Violence training with all employees
- GIS Mapping
 - Refer to following slides
- SAP, Threat of Violence Summary Report
 - Available to supervisors
 - Example slide to follow
- Employee Assistance Service (EAS)
- Corporate Security leads the investigations and partners closely with HR
- Corporate Security will facilitate or arrange police escorts and review documentation
- Violation of the policy can lead to discipline up to and including discharge

Tools and Resources - TOV GIS Mapping

EPIC - Enterprise Portal Information Center

SAP Enterprise Portal

CMS ENERGY
Consumers Energy

CMS/Links THINK Security Tools Employee Serv

eLine Electric **Gas** Corporate

Internet Search [] go Intranet Search [] go FAC

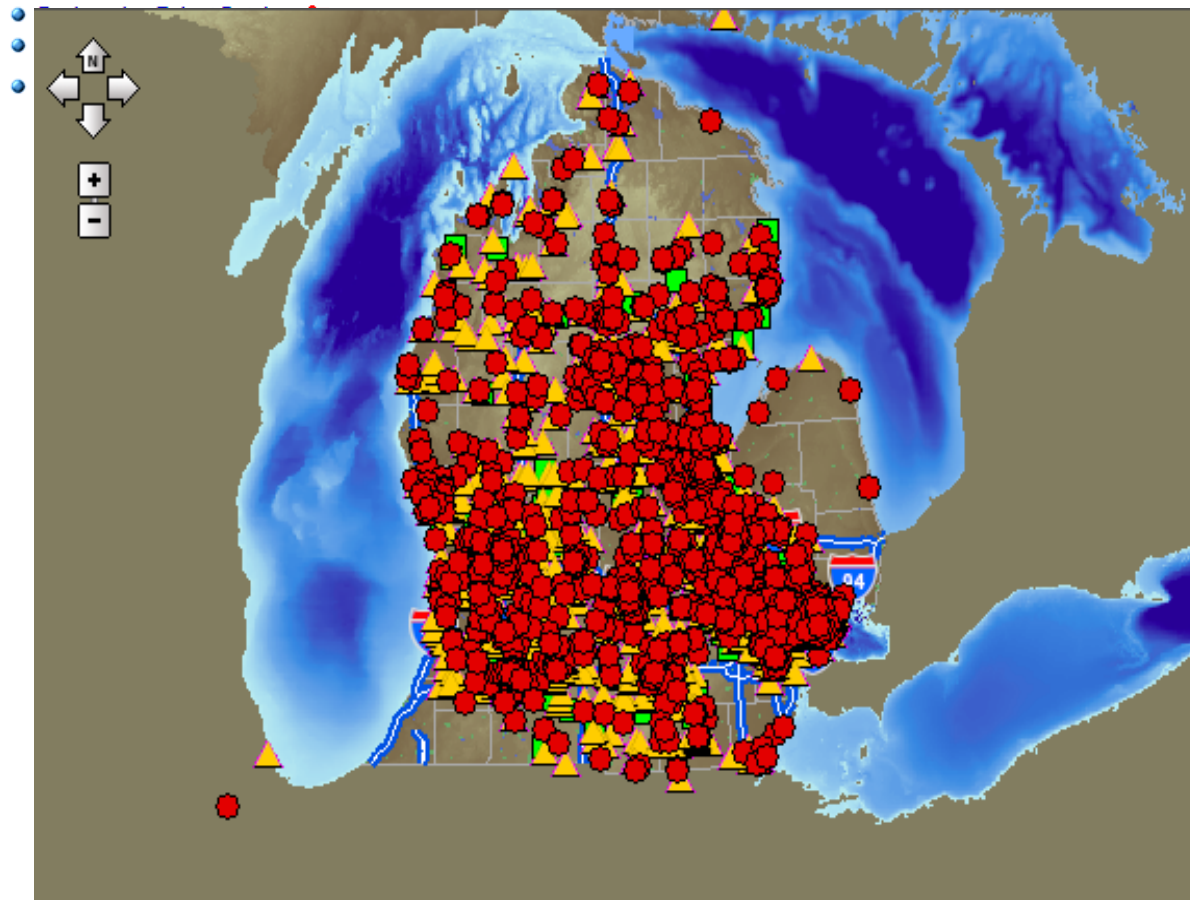
GAS APPLICATIONS

🔴 = Restricted Access 🔵 = Internet Link

Gas Applications

- 🔴 Cards Online
- 🔵 **GIS Web Portal**
- 🔵 Work Order Spatial Display

Damage Prevention Dashboard 🔴



Tools and Resources - TOV GIS Mapping (continued)



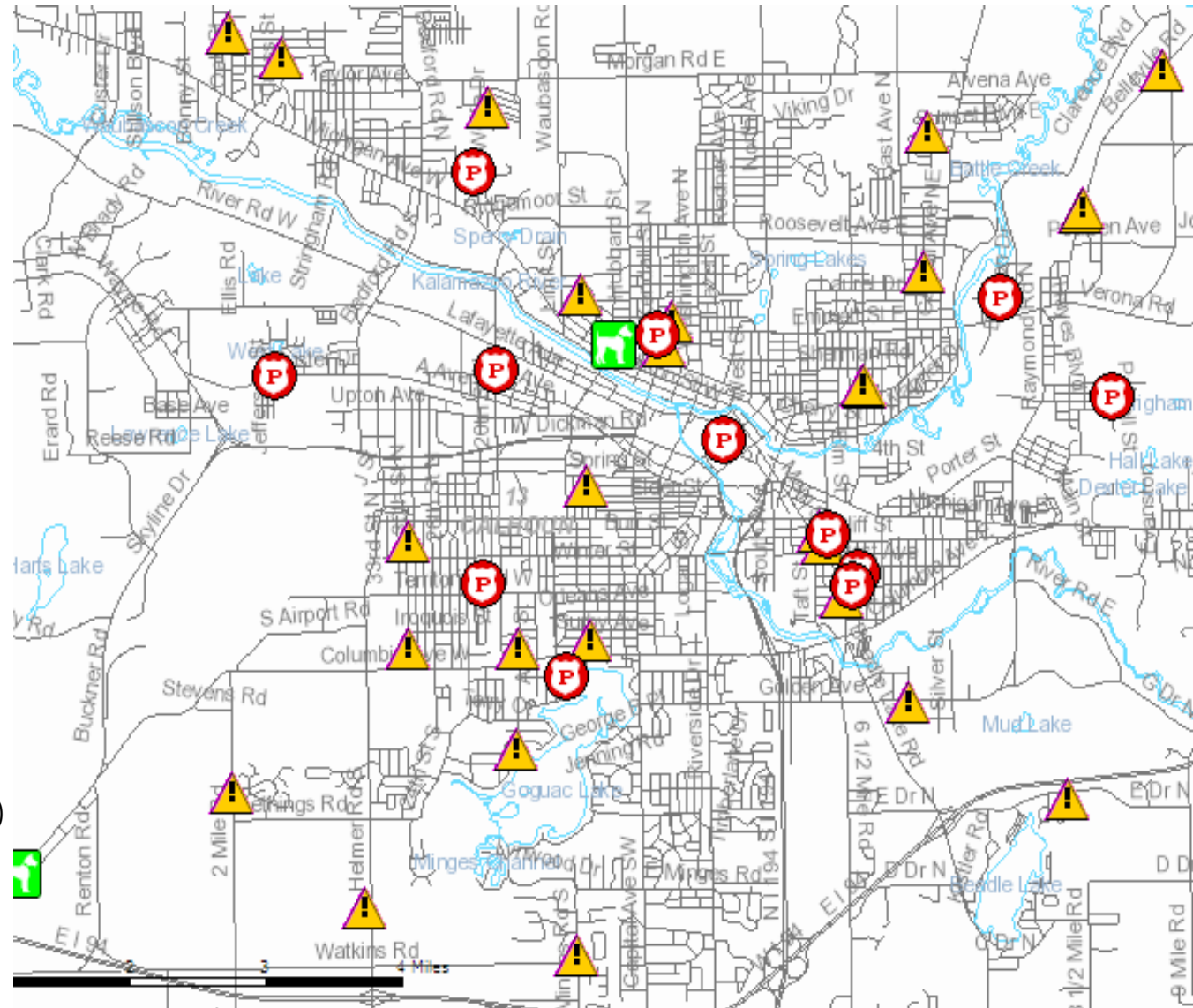
ZTHRTD 48 (Dog)



ZTHRT 42 - TOV



ZTHRTP 47
(Police Escort Required)



Things to Remember

- Take every threat seriously
- Be attentive to early warning signs
- Be cognitive of work-related stressors
- Cooperate with the Investigative Team
- Foster a positive workplace environment
- Use listening and conflict resolution skills
- All threats should be reported to: 1-800-760-3295
- Use/recommend the Employee Assistance Program
- When making personnel decisions, be fair and consistent
- Take preventative measures before a problem escalates into a violent act!
- Employees making serious alleged threats may be removed from the workplace pending results of an investigation



Tools and Resources - TOV Summary Report (continued)



| Threat Code | Business Partner Id | Last Name | First Name | Address | Street | Sup | City | Zip Code | County | Incident ID | Electric Device | Device Loc Code | Plant | Desc | Gas Device | Device Loc Code | Plant | Desc | APPL Device Loc Code | TRS | MRU | Premise ID | Responsible Institution | Change Date | |
|-------------|---------------------|-----------|------------|----------|--------|-----|------|----------|--------|---------------|-----------------|-----------------|-------|--------------|------------|-----------------|-------|--------------|----------------------|--------|--------|------------|---|-------------|--|
| ZTHRT | | | | 283 | | | | | | 2012-000705 - | 73351899 | 42 | 0091 | Kalamazoo | | | | | 42 | 011130 | 022129 | | Threat to Revenue Recovery | 5/15/2012 | |
| ZTHRT | | | | 5223 | | | | | | 1 | 22036937 | 42 | 0062 | Zeeland | | | | | 42 | 041503 | 041235 | | | 4/30/2011 | |
| ZTHRTP | | | | 1576 | | | | | | 2006-000122 | 73286121 | 47 | 0094 | Allegan | | | | | 47 | 021329 | 041202 | | Threat to Forestry | 2/8/2012 | |
| ZTHRT | | | | 6103 | | | | | | 2009-001320 | 87841959 | 42 | 0062 | Zeeland | | | | | 42 | 041613 | 041236 | | Threat to Forestry | 7/27/2009 | |
| ZTHRTP | | | | 6411 | | | | | | 2009-0000 | 22530509 | 47 | 0062 | Zeeland | | | | | 47 | 041610 | 041435 | | Threat to Forestry | 10/24/2010 | |
| ZTHRTP | | | | 3963 | | | | | | 2009-001* | 22037978 | 47 | 0062 | Zeeland | | | | | 47 | 041626 | 041439 | | Threat to Forestry | 4/30/2011 | |
| ZTHRTP | | | | 3719 | | | | | | 2011-001060 | 19216923 | 47 | 0094 | Allegan | | | | | 47 | 041635 | 041436 | | Threat to Call Center | 5/13/2011 | |
| ZTHRTP | | | | 500 | | | | | | 2008-001605 | 73244765 | 47 | 0094 | Allegan | | | | | 47 | 021329 | 041202 | | | 12/21/2010 | |
| ZTHRT | | | | 5666 | | | | | | 2011-001319 | 84787473 | 42 | 0094 | Allegan | | | | | 42 | 011509 | 041704 | | Threats to Revenue Recovery | 6/15/2011 | |
| ZTHRTP | | | | 824 | | | | | | 2010-001973 | 75687548 | 47 | 0094 | Allegan | | | | | 47 | 011509 | 041704 | | Threat to Employee | 9/8/2010 | |
| ZTHRTP | | | | 5994 | | | | | | 2010-000690 | 84075188 | 47 | 0094 | Allegan | | | | | 47 | 031518 | 041735 | | Threat to Forestry Employees | 9/19/2010 | |
| ZTHRTP | | | | 5821 | | | | | | 2007-002243 | 14378683 | 47 | 0094 | Allegan | | | | | 47 | 031519 | 041739 | | Threat to Meter Reading | 3/28/2011 | |
| ZTHRTP | | | | 5233 | | | | | | 2010-00** | 81028412 | 47 | 0094 | Allegan | | | | | 47 | 011503 | 041601 | | Threat to Call Center | 7/17/2012 | |
| ZTHRTP | | | | 5994 | | | | | | 2010-000690 | 60327029 | 47 | 0094 | Allegan | | | | | 47 | 031518 | 041735 | | Threats to Forestry Employee | 9/30/2010 | |
| ZTHRT | | | | 6492 | | | | | | 3 | 52583615 | 42 | 0094 | Allegan | | | | | 42 | 011603 | 041801 | | | 8/25/2010 | |
| ZTHRT | | | | 472 | | | | | | 2010-001245 | 91608723 | 42 | 0094 | Allegan | | | | | 42 | 011624 | 041804 | | Threat to Revenue Recovery | 9/8/2011 | |
| ZTHRTP | | | | 1113 | | | | | | 2012-0017** | 16395646 | 47 | 0094 | Allegan | | | | | 47 | 011604 | 041903 | | Threat to Forestry | 7/26/2012 | |
| ZTHRT | | | | 4238 | | | | | | 1 | 73357396 | 42 | 0094 | Allegan | | | | | 42 | 041428 | 042039 | | | 7/23/2009 | |
| ZTHRTP | | | | 1128 | | | | | | 2007-001292 & | 45176699 | 47 | 0094 | Allegan | | | | | 47 | 011118 | 040802 | | | 2/17/2010 | |
| ZTHRT | | | | 4109 1/2 | | | | | | 1 | | | | | 20114903 | 42 | 0025 | Hastings | | 42 | 041321 | 042037 | | | |
| ZTHRT | | | | 1575 | | | | | | 2010-001768 | 80141347 | 42 | 0094 | Allegan | | | | | 42 | 021628 | 042003 | | Threats to Forestry | 5/1/2011 | |
| ZTHRT | | | | 1567 | | | | | | 2010-001768 | 41656673 | 42 | 0094 | Allegan | | | | | 42 | 021628 | 042003 | | Threats to Forestry | 5/1/2011 | |
| ZTHRT | | | | 1565 | | | | | | 2010-001768 | 41656685 | 42 | 0094 | Allegan | | | | | 42 | 021628 | 042003 | | Threats to Forestry | 5/1/2011 | |
| ZTHRTP | | | | 842 | | | | | | 2010-002304 | 80166590 | 47 | 0091 | Kalamazoo | | | | | 47 | 011107 | 020229 | | Threat to Forestry employee | 11/4/2010 | |
| ZTHRT | | | | 711 | | | | | | 2008-000939 | 81635602 | 42 | 0094 | Allegan | | | | | 42 | 011222 | 040904 | | Threat to CSR | 5/22/2012 | |
| ZTHRT | | | | 4126 | | | | | | 2010-0003** D | 52036398 | 42 | 0061 | Grand Rapids | 9138407 | 42 | 0061 | Grand Rapids | 42 | 041222 | 030208 | | Threat to Meter Reading - Dog Bite | 9/11/2010 | |
| ZTHRTP | | | | 390 | | | | | | 2011-000828 | 35776903 | 47 | 0091 | Kalamazoo | | | | | 47 | 011135 | 020236 | | Threat to Call Center | 5/1/2011 | |
| ZTHRTP | | | | 1970 | | | | | | 2011-001931 | 94860102 | 47 | 0094 | Allegan | | | | | 47 | 031228 | 040501 | | Threat to Revenue Recovery | 8/28/2011 | |
| ZTHRTP | | | | 2363 | | | | | | 2007-001218 | 86378547 | 47 | 0094 | Allegan | | | | | 47 | 021304 | 040401 | | Threat to Forestry Contractors re: Guns | 12/23/2010 | |
| ZTHRTD | | | | 2092 | | | | | | 2012-0010** | 81796344 | 47 | 0094 | Allegan | | | | | 48 | 021208 | 040501 | | Threat to Meter Reader | 5/17/2012 | |
| ZTHRTP | | | | 2250 | | | | | | 2007-002107 | 46461537 | 47 | 0094 | Allegan | | | | | 47 | 021206 | 040501 | | Threat to Meter Reader | 6/18/2010 | |
| ZTHRT | | | | 251 | | | | | | 2011-000129 | 32435754 | 42 | 0094 | Allegan | | | | | 42 | 011226 | 040903 | | Threat to Call Center | 1/25/2011 | |
| ZTHRT | | | | 952 | | | | | | 2006-001158 | 73286160 | 42 | 0094 | Allegan | | | | | 42 | 011311 | 041004 | | Threat to CSR re: Meter Reader | 9/3/2010 | |
| ZTHRT | | | | 952 | | | | | | 2006-001158 | 34071443 | 42 | 0094 | Allegan | | | | | 42 | 011311 | 041004 | | Threat to CSR re: Meter Reader | 9/3/2010 | |
| ZTHRT | | | | 954 | | | | | | 2006-001158 | 80426174 | 42 | 0094 | Allegan | | | | | 42 | 011311 | 041004 | | Threat to CSR re: Meter Reader | 9/3/2010 | |
| ZTHRT | | | | 690 | | | | | | 2008-001925 | 73226863 | 42 | 0094 | Allegan | | | | | 42 | 011217 | 041001 | | | 2/11/2010 | |
| ZTHRT | | | | 692 | | | | | | 2008-001925 | 39646544 | 42 | 0094 | Allegan | | | | | 42 | 011217 | 041001 | | | 2/11/2010 | |
| ZTHRT | | | | 582 | | | | | | 2010-001986 | 22100758 | 42 | 0091 | Kalamazoo | | | | | 42 | 011119 | 022131 | | Threat to Call Center | 8/2/2011 | |
| ZTHRTP | | | | 4284 | | | | | | 2011-000600 | 83173809 | 47 | 0094 | Allegan | 25515077 | 47 | 0094 | Allegan | 47 | 041316 | 030207 | | Threat to Call Center | 2/7/2012 | |
| ZTHRTP | | | | 1320 | | | | | | 2012-000412 | 91612939 | 47 | 0094 | Allegan | | | | | 47 | 021131 | 040703 | | Threat to Revenue Recovery | 2/23/2012 | |
| ZTHRT | | | | 2371 | | | | | | 2007-001661 | 38798772 | 42 | 0094 | Allegan | | | | | 42 | 021605 | 042101 | | Threat to CES | 12/20/2010 | |
| ZTHRTP | | | | 5906 | | | | | | 2009-002375 | 45000994 | 47 | 0094 | Allegan | | | | | 47 | 031531 | 041739 | | Threat to CSR re: all employees | 8/10/2012 | |

- Electronic reporting system for capturing incidents and sending them to the Security Command Center