

# AEP'S HUMAN RIGHTS POLICY

## About This Policy

This policy defines AEP's respect for human rights for all employees, contractors, subcontractors, customers, suppliers and other stakeholders, to ensure the dignity, wellbeing and fair treatment of all people without discrimination. All company policies, procedures, guidelines and legal obligations continue to apply, including but not limited to the Principles of Business Conduct, Employee Handbook, Supplier Code of Code, Collective Bargaining Agreements and Terms and Conditions.

## AEP's Commitment to Human Rights

At AEP, our most important job is to deliver safe, reliable and affordable electric service to our customers. We strive to do more than keep the lights on; our mission is to positively impact the lives of our employees, customers and communities while strengthening local economies. This includes ensuring the dignity, wellbeing and fair treatment of all people without discrimination.

AEP defines human rights as rights inherent to all human beings without distinction of any kind, including race, color, sex, ethnicity, disability, veteran status, gender identify and expression, language, religion, political or other opinion, national or social origin, property, birth or any other protected status covered by applicable federal, state or local law.

### Through our Human Rights Policy, we commit to:

- Integrate respect for human rights into our operations, business practices and supply chain, recognizing that it is not only essential to our mission, but also imperative as we transition to a sustainable and clean energy future.
- Respect international human rights principles as identified in the [United Nations Universal Declaration of Human Rights](#).
- Support [American Clean Power's Forced Labor Pledge](#) that orders the protection of human rights through supply chains that adhere to humane labor practices while developing clean power resources.
- Consider relevant standards and guidance, including the [United Nations Guiding Principles on Business and Human Rights](#) and map our efforts to the [United Nations Sustainable Development Goals](#).

AEP's policies and practices have long reflected a commitment to, and respect for, human rights as required by all applicable federal, state and local laws, rules, regulations, orders and ordinances, including, without limitation, environmental protection, energy, safety and health, and labor laws and regulations, as well as applicable industry codes and standards. This policy summarizes efforts in place for employees, contractors, suppliers, communities, and other stakeholders to understand our philosophy, practices and commitment regarding human rights.

## Ethics & Compliance

At AEP, we believe in doing the right thing every time for our customers and each other. We are committed to health, safety, financial, operational and environmental compliance while holding ourselves to a high standard of ethical conduct – always doing what is right. Our [Principles of Business Conduct](#) (AEP’s Employee Code of Conduct) set legal and ethical standards for every employee at AEP. We promote our Ethics Program in tandem with our culture journey, driving a culture that supports the interests of both employees and AEP by maintaining a vigilant approach to practicing compliance and acting with integrity. We support a Speak Up culture that encourages employees to raise and discuss misconduct and inappropriate behavior without fear of retaliation.

## Safety & Health

At AEP, no aspect of our work is more important than safety and health, whether it is for an employee, a contractor or a member of the communities that we serve. Under our culture of Zero Harm, we believe that all injuries and occupational illnesses are preventable ***Because We Care*** that everyone goes home in the same condition as when they came to work. Zero Harm is at the center of everything we do to protect our employees, business partners and the communities we serve. AEP sponsors a comprehensive program of accident prevention and sets standards and procedures designed for the welfare of our employees, contractors, suppliers and public, setting the highest expectations of safety and conduct.



**ZERO HARM<sup>SM</sup>**

## Workplace Security

Whether in the field or in the office, we believe every employee should feel safe and secure while at work. Our quest for Zero Harm reaches beyond occupational safety and health to include employee and workplace security. We have developed policies, procedures and training to increase employees’ ability to recognize, report and respond to workplace aggression and build situational awareness.

AEP recognizes the importance of having effective and meaningful privacy protections in place when it collects, uses, retains, discloses and/or destroys Personally Identifiable Information (“PII”). These protections are necessary to ensure AEP’s own compliance with data privacy laws and to ensure the compliance and protection of contractors, agents and customers who may furnish PII to AEP. Our PII Data Privacy Protection Policy (“Policy”) establishes privacy standards applicable to PII throughout AEP. We also comply with local and state privacy and data protection laws or regulations.

## Freedom of Association & Collective Bargaining

We value the relationships we have with our represented employees and believe in a trusting, collaborative and respectful partnership with them. AEP respects the rights of employees to join an organization of their choosing in compliance with applicable laws and will comply with collective bargaining obligations and agreements from properly certified labor unions. Mutual promises and agreements are contained within Collective Bargaining Agreements laying out the expectations, obligations and requirements of our company and represented employees. This may include working hours (including overtime), compensation, wages, benefits, holidays, vacation and leave of absence, safety, training, non-discrimination and grievance procedures.

## **Forced Labor, Child Labor, Prison Labor & Human Trafficking**

AEP stands firmly against the use of forced labor, child labor, prison labor and human trafficking within our services and operations including our supply chains. We expect the use of workers who have voluntarily agreed to all employment terms, are free to end their employment when they choose, are not forced into debt bondage situations or coerced to work, do not meet the definition of child labor, and are able to freely enter and exit their workspaces and living quarters.

## **Suppliers & Partners**

AEP values its relationships with our suppliers, energy providers, and other organizations looking to do business with us, and we want to be as transparent as possible in our expectations of them. AEP expects suppliers to uphold the same standards of Human Rights as defined in this policy and explained further in the supplier Terms and Conditions and the [Supplier Code of Conduct](#). Suppliers are also expected to self-monitor and demonstrate their compliance with AEP's Standards of work. In addition, we reserve the right to conduct on-site audits of suppliers on environmental and social issues to ensure compliance with this policy and all applicable laws.

## **Diversity, Equity & Inclusion**

AEP is committed to providing and fostering an inclusive business environment and culture that values and leverages the unique talents, perspectives and experiences of each employee. Every employee at AEP brings distinct insights based on a combination of gender, age, culture, national origin, ethnicity, religion, abilities, sexual orientation, gender identity, education, personality, world experience and upbringing. Those differences are a powerful asset because they reflect the diverse nature of our workforce. Supplier diversity is also integral to our commitment to diversity, equity and inclusion. We are committed to developing a pool of diverse, strategic suppliers and business partners that generally reflects the customers we serve.

## **Discrimination & Harassment**

Our company is committed to ensuring an environment that is fair and respectful to all individuals, employees and non-employees alike, regardless of sex, race, color, ethnicity, religion, national origin, age, disability, veteran status, sexual orientation, gender identity and expression, or any other protected status covered by applicable local, state or federal law. Our company always has been and will continue to be committed to providing a work environment that is free of intimidation, discrimination and harassment. Abuse of the dignity of anyone through derogatory comments or objectionable conduct, not only is offensive employee behavior, but is a violation of company policy and will not be tolerated.



## Benefits, Hours & Wages

AEP compensates employees equitably and competitively relative to the applicable industry and labor market and in accordance with terms of applicable collective bargaining agreements. AEP is committed to complying with applicable minimum wage, wage payment, work hours, overtime and benefits laws. Each AEP organization establishes work shifts and schedules as appropriate to meet business needs and to comply with applicable laws and collective bargaining agreements. AEP also works to provide a supportive, responsive workplace that allows employees to balance work with family and personal responsibilities.

## Environmental Responsibility & Social Justice

We are committed to protecting the environment and conducting our business in an environmentally sustainable manner. This includes complying with all applicable environmental regulations and being good stewards of natural resources. Our goal is zero violations of environmental regulations or laws and zero enforcement actions. We are proactive in our efforts to protect people and the environment, as defined in our [Environment, Safety and Health Policy](#), which is in conformance as outlined in the ISO 14001:2004 and OHSAS 18001:2007 Section 4.2.

In addition, we support the fair distribution of benefits and impacts associated with our activities, and believe all communities should have equitable access to clean, reliable electricity. AEP's [Environmental and Social Justice Policy](#) reinforces our commitment to consider the environmental and social impacts of our recommendations and decisions so that we positively impact low-wealth communities, communities of color and other historically marginalized communities.

## Community & Stakeholder Engagement

AEP is committed to engaging with our stakeholders on human rights issues, as well as other ESG-related issues such as climate change and human capital management. Such engagement allows us to hear perspectives we might not have considered, mitigate risks, identify opportunities for collaboration, build stronger relationships, and arrive at consensus or shared motivation for meaningful outcomes. AEP publicly discloses a [list of the stakeholders](#) with whom we engage most frequently along with the topics of interest and how we engage.

## Reporting & Remediation

We are committed to providing an effective reporting process to remedy situations where AEP may have caused or contributed to an adverse human rights impact. All AEP employees, contractors, subcontractors, customers, or suppliers are able to report concerns anonymously or to seek guidance on ethical, safety or compliance matters through a confidential, 24/7 hotline or online portal. All calls to AEP's Concerns Line are answered by an independent, non-affiliated firm to ensure anonymity when desired by the caller. The information is then transmitted to Ethics & Compliance (E&C), and an investigation is conducted.

[AEP's Speak Up Policy](#) encourages employees and leaders at all levels to speak up if there is a violation of the law or something that is not in alignment with our culture or ethics. We will investigate any concern or complaint raised and prohibit any form of retaliation against anyone who raises a human rights-related complaint or question, or participates in subsequent investigations of any such complaints.

We are also committed to being transparent about our human rights performance, policies and practices through our [annual sustainability report](#) and [supplemental disclosure efforts](#).

## Compliance & Training

Employee awareness of and dedication to compliance with human rights policies, practices and requirements are the keys to meeting our moral, ethical and legal obligations to protect our employees and those who work on behalf of AEP. Respect for human rights is covered in AEP's Principles of Business Conduct training, as well as other human rights-related training, which all employees are required to take. It is mandatory for employees to comply with the Human Rights Policy, and employees will be held accountable for willful violations.

### Additional human rights-related required training includes:

- Conflicts of Interest
- The Power of Respect  
(sexual harassment prevention training)
- Mitigating Bias in Candidate Selection

## Governance

The Board of Directors' Committee on Directors and Corporate Governance (the Corporate Governance Committee) oversees AEP's Corporate Compliance Program, receives regular reports from the Chief Compliance Officer, and oversees our annual sustainability report. This oversight includes receiving information on human rights issues.

In addition to monitoring and enforcing employees' legal and ethical compliance, AEP's Office of Ethics & Compliance is committed to raising the level of awareness of all AEP employees about the importance of ethics and compliance in the workplace. AEP's Ethics & Compliance group administers AEP's ethics and compliance program. The Chief Compliance Officer meets regularly with AEP's Chief Executive Officer and the Corporate Governance Committee and regularly reports to executive leadership. An effective ethics and compliance program promotes an organizational culture that encourages the highest ethical standards of business conduct and a commitment to compliance with the law.

This policy will be reviewed and approved through the appropriate channels as identified in AEP's Policy Development & Maintenance Policy (Policy on Policies).

## How to Report an Incident

If you become aware of any conduct or behavior in violation of the law or of this policy, by anyone working for or on behalf of AEP, or if you have any questions or concerns regarding potential violations of the law or of this policy, immediately contact:

- Your supervisor or management;
- Human Resources;
- AEP Concerns Line, toll free, 24 hours a day at 1-800-750-5001 or [www.aepconcernsline.com](http://www.aepconcernsline.com);
- Ethics & Compliance directly at 614-716-6226;
- Mail: Office of the Chief Compliance Officer  
American Electric Power  
1 Riverside Plaza  
Columbus, OH 43215

The AEP Concerns Line allows you to make a report anonymously if desired. Ethics & Compliance will make every effort to maintain confidentiality of the information shared and the anonymity of anyone disclosing information.

AEP has a [Speak Up Policy](#) to reinforce federal protection of Whistleblowers who report fraud, corruption, waste, abuse or mismanagement. AEP will not tolerate any retribution or retaliation against anyone for raising a concern in good faith about a potential violation of this policy, or for cooperating with an investigation.



## Consequences

Violation of this policy may result in disciplinary action, up to and including termination of employment.

### Additional AEP Policies Related to Human Rights

- [Principles of Business Conduct](#)
- [AEP's Speak Up Policy](#)
- AEP's Employee Handbook
- Conflicts of Interest
- Bribes and Kickbacks
- Gifts and Entertainment
- Anti-Fraud
- PII Data Privacy Protection Policy
- Records Retention Manual
- Antitrust
- No-Conduit Rule
- Future of Work Policy
- Security Information Classification Standards
- Appropriate Use of Company Assets
- Prohibition Against Pornography and Offensive Material Policy
- Social Media Policy
- [Insider Trading Policy](#)
- Policy Development & Maintenance Policy
- Policy Against Retaliation
- [Political Engagement Policy](#)
- [Anti-Corruption Policy](#)
- [Supplier Code of Conduct](#)
- [AEP's Environmental and Social Justice Policy](#)
- [Environment, Safety and Health Policy](#)