

A GUIDE FOR OUR VENDOR PARTNERS

Supplier Code of Conduct



At AEP, we believe in doing the right thing every time for our customers, one another and our future.



We are committed to the highest standards of ethics and integrity in everything we do. We expect our suppliers to share and uphold these same values.

AEP values its relationships with its 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. The Code of Conduct will act as a guide for suppliers in carrying out their responsibilities and defines both the ethical and legal standards by which they must operate. No matter the role or responsibilities, the expectation is to act in accordance with only the highest standards of business. Nothing less should be accepted.

Our Supplier Code of Conduct is our guidepost as we strive to power a new and brighter future for our customers and communities.

A handwritten signature in blue ink that reads "Pardeep Gill". The signature is fluid and cursive, with the first name "Pardeep" being more prominent than the last name "Gill".

Pardeep Gill
SVP Procurement, Supply Chain, and Fleet



Introduction

AEP places paramount importance on corporate integrity, responsible sourcing of goods and services, the equitable treatment and wellbeing of workers, environmental stewardship, and the security and safety of the electric grid.

These principles are reflected in this Supplier Code of Conduct, which establishes the minimum standards that must be met by a vendor, manufacturer, contractor, seller, consultant, or other supplier (each a “Supplier” and collectively, “Suppliers”) that sells goods or services to or does business with AEP.

This Supplier Code of Conduct establishes the minimum standards that apply to all Suppliers. It complements the more detailed requirements set out in the terms and conditions (“Terms and Conditions”) of any contract, agreement, or order between a Supplier and AEP.

Applicability

This Supplier Code of Conduct clarifies AEP’s expectations for Suppliers supplying goods or services to, or performing work for or on behalf of, AEP. Suppliers must take reasonable steps to ensure that their suppliers and subcontractors act in accordance with this Supplier Code of Conduct or similar principles. Suppliers must communicate these expectations throughout their supply chains and work to identify, assess, and address significant social, labor, environmental, and ethical risks within those supply chains. Suppliers are also expected to self-monitor and demonstrate compliance with this Supplier Code of Conduct. Suppliers must cooperate with AEP’s assessments and audit rights and provide requested documents showing compliance with this Supplier Code of Conduct and applicable contract requirements.

Safety & Health

AEP is committed to continuous improvement of its safety, health, and environmental performance. We listen to and respond to concerns raised by our stakeholders, and we are transparent about our goals and progress. AEP recognizes its responsibility to manage its business sustainably and with integrity. Accordingly, we have set high standards for how we conduct business in the areas of social and environmental responsibility. Safety and health are AEP’s top priorities, and we expect Suppliers to maintain safe working conditions.

- Suppliers must provide a safe and healthy working environment, including appropriate controls, training, work procedures, and personal protective equipment.
- Suppliers must comply with all applicable laws and regulations regarding working conditions, as well as the Terms and Conditions of their contract when those requirements are more stringent.
- Poor safety performance or failure to adhere to AEP’s safety and health policies may result in a request that the Supplier develop a safety and health performance improvement plan. Such failures may also put the Supplier’s business relationship with AEP at risk.

Ethical & Legal Requirements

Acting ethically and complying with all applicable laws, regulations, and legal requirements are integral to the way AEP conducts its business.

- Suppliers must conduct business in a legal and ethical manner and act with integrity.
- Suppliers must comply with all applicable laws and regulations, as well as AEP requirements, which may exceed local legal requirements. When AEP requirements are more stringent, Suppliers must meet the more stringent requirements.
- Suppliers performing work in connection with DOE grant- or loan-funded projects must comply with all applicable federal requirements, award terms, contractual flow-down obligations, certifications, recordkeeping, audit support, and reporting requirements communicated by AEP.
- Suppliers must avoid any conflict of interest when interacting with AEP employees.
- Suppliers must not engage in any form of commercial bribery with any political, regulatory, or other government official and must comply with the U.S. Foreign Corrupt Practices Act and all other applicable laws related to bribery of government officials.
- Suppliers must avoid any business, financial, or other relationship in which personal interests conflict with, or appear to conflict with, the interests of AEP and its shareholders.
- Suppliers must comply with all applicable economic sanctions, export control, anti-money laundering, and anti-boycott laws, and must not engage in any transaction prohibited by those laws.
- Suppliers must comply with all applicable laws regarding fair competition and antitrust.
- Suppliers must exercise sound judgment when deciding whether to offer or accept a gift or

business-related entertainment (including meals). Although modest gifts and business-related entertainment can build goodwill and help develop business relationships, they can also call personal integrity into question or appear to create an unfair business advantage.

- Suppliers must provide a means for their employees to report concerns or potentially unlawful activities in the workplace. Suppliers must keep such reports confidential, investigate them, and take corrective action, if appropriate. Suppliers must not retaliate against any individual who reports concerns, raises questions, participates in an investigation, or exercises rights protected by applicable law.

Human Rights

AEP's Human Rights Policy ensures the dignity, wellbeing, and fair treatment of all people without discrimination. This policy summarizes efforts in place for all stakeholders, including workers performing work for, or on, our behalf, to understand our philosophy, practices, and commitment regarding human rights. This includes:

- Suppliers are expected to treat their employees with dignity and respect.
- Suppliers must not discriminate against any employee based on race, color, religion, sex (including pregnancy, gender identity, and sexual orientation), national origin, age, veteran or military status, disability, genetic information, or any other basis prohibited by applicable law.
- Suppliers must not tolerate racism, sexism, or sexual harassment of their employees or other stakeholders.
- Suppliers must not tolerate the trafficking or involuntary servitude of any worker, including forced labor, child labor, prison labor, and human trafficking.

- In accordance with local laws, Suppliers must respect the rights of their employees to associate freely, join (or not join) organizations of their choice, and bargain collectively without interference, discrimination, retaliation, or harassment.
- Suppliers must not use forced, bonded, indentured, or involuntary prison labor. Consistent with the International Labour Organization (ILO) indicators of forced labor and the U.S. Uyghur Forced Labor Prevention Act, Suppliers must not require workers to pay recruitment fees or related costs, must not retain workers' government-issued identification or travel documents, and must not unreasonably restrict workers' freedom of movement.
- Suppliers must not employ any worker below the minimum legal working age in the applicable jurisdiction and, in no case, below the age of completion of compulsory education or 15 years, whichever is greater.
- Suppliers must provide wages, benefits, and working hours that comply with all applicable laws, and must give workers a confidential means to raise workplace concerns or grievances without fear of retaliation.

Security of our Assets & Data Protection

- Suppliers must undergo a third-party risk assessment to evaluate AEP's ability to protect its assets from cybersecurity threats and breaches involving third-party suppliers.
- When indicated by AEP's Third-Party Risk Governance process, Suppliers must, in good faith, negotiate the AEP Security Supplement with AEP.
- AEP is subject to the North American Electric Reliability Corporation Critical Infrastructure Protection (NERC CIP) Standards. These Reliability standards include extensive requirements for securing utility infrastructure and implementing specific information management policies.
- Suppliers must follow the protections in place when collecting, using, retaining, disclosing, or destroying Personally Identifiable Information ("PII").
- Suppliers are required to safeguard AEP's confidential and proprietary information, trade secrets, and other intellectual property (which includes copyrights, trademarks, and patents). AEP will respect the intellectual property rights of its Suppliers. Suppliers may not intercept, duplicate, or gain the intellectual property of others through any means, unless given permission by the intellectual property right holder.
- Limited personal use of certain AEP-owned assets (e.g. phones, laptops, and other assets as determined by AEP) is permissible. The use of company-owned assets for outside personal business purposes is prohibited.

Environment

AEP is fully committed to being a good steward of the environment.

- AEP's commitment to sustainability includes the efficient use of resources and respect for the environment. Suppliers are encouraged to collaborate with AEP to eliminate waste and cost from the supply chain. Suppliers should work to reduce emissions and waste and to use energy and natural resources efficiently.
- Suppliers must comply with all applicable environmental laws, regulations, and standards and demonstrate they are doing such.
- Suppliers must have a risk management program to prevent, mitigate, and account for the identified environmental risks and impacts.

Questions & Concerns

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

Concerns Line Web address:

www.aepconcernsline.com

Ethics & Compliance Hotline: 1-800-750-5001

Ethics & Compliance Office Line: 614-716-6226