

Speak Up Policy

Title:	Speak Up Policy	Date:	7/23/2024
Owner:	Chief Compliance Officer	Sponsoring Area(s):	Ethics and Compliance

Policy Statement:

AEP is committed to conducting business in an ethical manner in compliance with our *Principles of Business Conduct*, all applicable laws and regulations, and other company policies.

It is the responsibility of all employees to report suspected violations in accordance with this Speak Up Policy.

Detail:

Why Speak Up?

At AEP we want our employees to feel safe to raise concerns and to know that they will be taken seriously. We encourage employees to Speak Up. It is our goal to nurture a culture that supports ethically sound behavior and instills a sense of shared accountability among employees to support the success of AEP.

All employees shall review and understand this Speak Up Policy.

“AEP” means American Electric Power and any of its subsidiaries.

“Whistleblower” means any person who reports a violation of law or regulation, fraud, waste, abuse, corruption or dangers to public health or safety. Reporters of misconduct are sometimes referred to as “whistleblowers”.

“Speak Up” means when an employee who has knowledge of activities which are illegal or unethical, or which violate company policy, reports those activities to the proper company authorities. “Concern” or “Complaint” means the initial communication of activities which might be illegal or unethical, or violate company policy, to proper company representatives.

Who Can Speak Up?

This policy applies to employees, contractors, vendors, and third-party suppliers.

Examples of Potential Misconduct include, but are not limited to:

- Violation of *the Principles of Business Conduct* or other AEP policies and standards;
- Any violation of laws or regulations;
- Improper use of company resources;
- Dishonest or unethical behavior;
- Sexual harassment;
- Discrimination, harassment or bullying;
- Retaliating against or causing detriment to a person who Speaks Up;
- Any criminal activity (such as fraud, theft, bribery, insider dealing etc.);

- Falsification of financial records;
- Conflicts of interest;
- Conduct likely to damage the company's reputation;
- Privacy breaches (misuse of personal data);
- Gifts, entertainment or hospitality in violation of company policy;
- Conduct endangering health and safety;
- Inappropriate disclosure of confidential information;
- Covering up any wrongdoing in relation to other listed examples.

Confidentiality

Employees can submit confidential and/or anonymous complaints. AEP will make every effort to maintain confidentiality of the information shared and the anonymity of anyone disclosing information.

Anti-Retaliation

You should not be afraid to Speak Up. Retaliation against Whistleblowers (including employees) who raise concerns or questions about misconduct will not be tolerated. AEP does not accept any form of retaliation against any person who reports a concern in good faith. This means that you are protected from any type of retaliation including but not limited to harassment, bullying, demotion, or other type of adverse action when you Speak Up.

Allegations of retaliation for reporting concerns are serious and will be thoroughly investigated.

If you become aware of retaliation against you or anyone else for having raised a concern in good faith about suspected misconduct, you should report your concern to your supervisor, manager, Ethics & Compliance ("E&C"), Human Resources (HR), or the AEP Concerns Line immediately. Confirmed allegations of retaliation will result in appropriate disciplinary action, up to and including termination.

Receipt and Treatment of Concern

The Investigation

Once the Concern has been raised, the process will be as follows:

- If the Concern was reported to AEP's Concerns line via telephone, the initial interview will be conducted by an independent, non-affiliated firm to ensure anonymity when desired by the caller. If the Concern was submitted via the internet portal, a member of E&C will follow-up with the reporter if the reporter identifies themselves.
- E&C investigates every Complaint, which may include interviews and review of documents, phone records, emails and other company data.
- At the conclusion of every investigation E&C provides a response to the reporter directly or through the AEP Concerns Line.

Good Faith

All Concerns should be reported in good faith. An employee may be subject to disciplinary action if the employee knowingly makes a false allegation, provides false or misleading information in the course of an investigation, or otherwise acts in bad faith.

Improving as a Company

When you use internal channels to Speak Up, you give AEP the chance to look into the matter and take action if needed. In this way we can work together in resolving the concern. Therefore, we encourage you to use internal channels to Speak Up.

Nothing in this policy, however, is meant to discourage or obstruct an individual from filing complaints about ethical misconduct with any federal, state, or local official or agency; having discussions about such ethical misconduct with an attorney; or disclosing information as otherwise required by law. No adverse employment actions will be taken against employees because a report of misconduct is filed, including those filed with any federal, state, or local official or agency, or for participating in the investigation of such reports.

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 1-888-237-2363
- AEP Concerns Line, toll free, 24 hours a day at 1-800-750-5001 or 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.