

AEP 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 Conduct, Collective Bargaining Agreements and Terms and Conditions.

This policy applies to all AEP employees, contractors and vendors.

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.

AEP defines human rights as rights inherent to all human beings without distinction of any kind, including 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.

Through our Human Rights Policy, we commit to:

- Integrate respect for human rights into our operations, business practices and supply chain 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.
- Respect international human rights principles.
- Consider relevant standards and guidance, including the [United Nations Guiding Principles on Business and Human Rights](#) to the [United Nations Sustainable Development Goals](#).

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 hold ourselves to the highest standard of ethical conduct. The Ethics and Compliance Program supports a culture of compliance with a foundation of honesty and integrity. The AEP [*Principles of Business Conduct*](#) act as our guide by defining the ethical and legal standards by which we operate every day – from executive leadership to employees at all levels. AEP *Principles of Business Conduct* outlines the expectations of employees regarding our culture, relationships, assets, security practices and image. The AEP Speak Up Policy communicates the importance of open dialogue and the expectation that all employees will report suspected misconduct without fear of retaliation. We support a safe space to discuss difficult topics.

Safety & Health

Providing a safe and secure workplace is at the core of everything we do at AEP and part of our commitment to our workforce. Our goal is zero injuries and accidents. We have policies, procedures, programs, training and initiatives in place to help ensure a safety conscious work environment and are committed to fundamentally embedding layers of protection in the work we do. This includes focusing our efforts to prevent serious injuries and fatalities, strengthening pre-job briefing effectiveness, learning from safety incidents, providing appropriate training and education and improving proactive safety initiatives and data analysis to identify and address potential performance gaps.

Workplace Security

Whether in the field or in the office, we believe every employee should feel safe and secure while at work. Our safety and health efforts 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 prioritizes strong data security and privacy protections to ensure effective and trustworthy interactions with customers and employees, complying with all relevant privacy and security laws. We are committed to enhancing the protection of high-value data through improved inventory practices, security protocols, and leadership accountability, while our Privacy Policy outlines a commitment to consumer privacy, detailing the types of data collected and the purposes for processing that data. AEP is transparent about how consumer data is used and who can access it while focusing on securely collecting and managing personally identifiable information (PII) through our PII Protection Program.

Freedom of Association & Collective Bargaining

We value the relationships we have with our employees and believe in a trusting, collaborative, and respectful partnership with our labor unions. 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 our 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.

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 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. 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 anyone's dignity through derogatory comments or other objectionable conduct 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 Respect

At AEP, we are committed to environmental respect as we strive to responsibly operate our business to avoid impacts on the environment. This includes our commitment to always complying with applicable environmental requirements and being good stewards of natural resources. 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.

Community & Stakeholder Engagement

Listening to and engaging with our stakeholders to understand their needs is deeply embedded in AEP's culture. We rely on the voices of our employees, customers, regulators, policymakers, investors, communities and nongovernmental organizations (NGOs) to inform our strategy and decision-making. This collaborative approach fosters trust while strengthening lines of communication, transparency and accountability.

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.

[The AEP 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

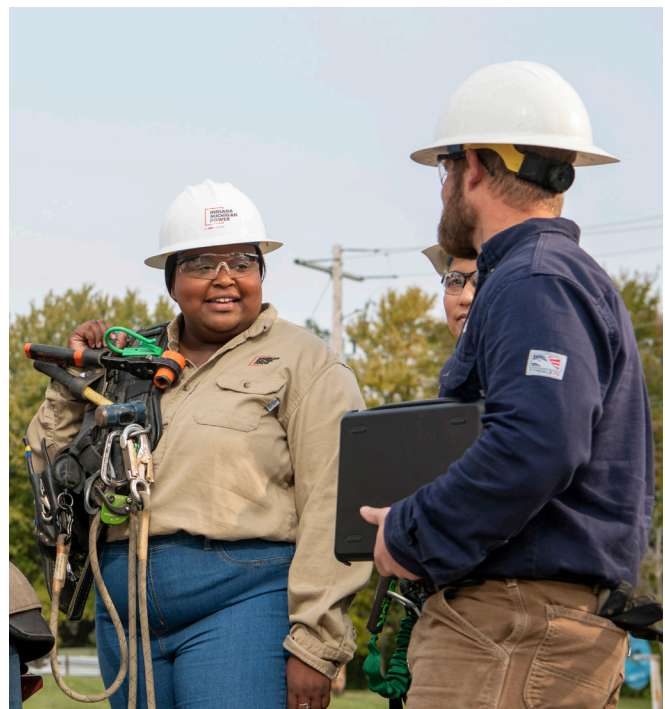
Employee awareness of and dedication to compliance with human rights policies, practices and requirements are the keys to meeting our moral, ethical and legal obligations to protect our employees and those who work on behalf of AEP. Respect for human rights is covered in AEP's *Principles of Business 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

Governance

The Board of Directors' Committee on Directors and Corporate Governance (the Corporate Governance Committee) oversees AEP's Corporate Compliance Program and receives regular reports from the Chief Compliance Officer. This 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. The AEP Ethics & Compliance group administers the AEP 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 at (1-888-237-2363) or hr@aep.com
- 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.

Additional AEP Policies

- [Principles of Business Conduct](#)
- [Speak Up Policy](#)
- Employee Handbook
- Conflicts of Interest
- Bribes and Kickbacks
- Gifts and Entertainment
- Anti-Fraud
- AEP Privacy Policy
- AEP Internal Privacy Policy
- Records Retention Manual
- Antitrust
- No-Conduit Rule
- 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](#)
- [Environment, Safety and Health Policy](#)



