



Title:	Anti-Corruption Policy	Date:	01/01/2021
Owner:	Ethics & Compliance, Chief Compliance Officer	Sponsoring Area(s):	Legal, HR, Ethics & Compliance
Policy Statement:			

Our business relies on the trust we build with our customers, partners, and suppliers. All AEP employees are expected to know and follow our anti-corruption policies and all relevant anti-corruption laws. AEP is committed to observing the laws and regulations that govern our operations wherever we do business.

Detail:

American Electric Power is committed to doing business with integrity and transparency. We strictly prohibit anyone acting on behalf of AEP, whether directly or indirectly, from making, soliciting or receiving bribes or improper payments. AEP’s Anti-Corruption Policy forbids making payments, offers of money, or offers of anything that has value, to improperly influence anyone. You must not pay or offer a bribe or kickback of any kind to Government Officials or in commercial transactions, including procurement of goods or services.

Additionally, AEP is committed to abiding by all gift rules and prohibitions that jurisdictions have in place. These rules apply regardless of the gift-giver’s motive or intent, and can include anything of value, including food, beverage and entertainment. Rules may vary by jurisdiction.

This policy also applies to payments that our representatives, such as our suppliers, partners, consultants, and lobbyists, make on our behalf.

All employees shall review and understand this Anti-Corruption Policy.

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

“Bribe” means offering, promising, giving or authorizing others, such as lobbyists and political consultants, to give anything of value, tangible or intangible, either directly or indirectly, to any individual – including Government Officials – to gain an unfair business advantage or to influence improperly an official’s decision-making with respect to the Company. The term “anything of value” is intentionally broad to ensure that careful consideration and scrutiny is given to interactions with Government Officials. It includes things you may not recognize as valuable, such as benefits conferred on others at the request of a Government Official or their agent or intermediary, and benefits conferred to lobbyists, consultants, Government Officials’ family members or friends, or



Government Officials' current or former employees. **In addition to cash, bribes may also include:**

- Gifts, especially gifts beyond a nominal value;
- Entertainment, hospitality and/or travel that is beyond reasonable business needs;
- Food and beverage;
- Personal services, favors or loans;
- Offers of employment;
- Charitable or political contributions;
- Awarding of contracts or business;
- Payments or benefits for services for an individual's family members or acquaintances, including offers of employment;
- Payments, benefits, or services including kickbacks to a "facilitator." A kickback is a bribe or payment to someone who has facilitated a transaction or appointment.

"Government Official" includes:

- Any official, officer, employee or representative of, or any person acting in an official capacity for or on behalf of, any governmental entity (including federal, state, local, or municipal government department or agency), whether elected, appointed, retained or otherwise employed, when that individual's role or position involves oversight of or influence over AEP's interests.
- Any political party or party official or candidate for political office;
- Any company, business, enterprise or other entity owned, in whole or in part, or controlled by any person described above.

The following list, while not exhaustive, provides examples of conduct that is prohibited:

- Give or authorize others to give, offer, or promise anything of value (no matter how small) to improperly influence an official's decision-making with respect to the Company or obtain an unfair business advantage;
- Ask for or accept a bribe;
- Ask anyone else to do something that the law or our policies prohibit you from doing;
- Attempt to conceal or misrepresent a payment or an expenditure;
- Take or accept something of value in exchange for the awarding or employment of a contractor or vendor, including access to company resources.

In addition, all employees should do the following to avoid inadvertent violations of this policy:

- Use care and follow our policies and procedures on retaining third-party business associates, and properly supervise their activities;
- Confirm all payments, benefits or exchanges of value are fully, honestly and accurately reflected in the company's books and records.

**Gifts:**

In addition to anti-bribery laws, many jurisdictions have gift laws in place that prohibit or limit employees from furnishing meals, gratuities, entertainment or anything else of value to Government Officials regardless of motive or intent. There is no universal monetary threshold that makes something of value a gift; some jurisdictions' laws impose a zero-tolerance rule for Government Officials. Employees responsible for contracts with Government Officials must be familiar with, and abide by applicable laws and policies.

Procurement decisions:

AEP is committed to making procurement decisions based on objective criteria, including the qualifications and reputation of the vendor and the needs of the business. It is prohibited to select a vendor or supplier for the purpose of influencing a Government Official to take official action for the benefit of the Company, even if no Government Official has made a request with respect to the vendor or supplier.

If a Government Official performs or offers to perform an official Act for AEP in exchange for AEP's selection of a vendor or supplier:

- The Government Official's request must be reported immediately to the Company's Chief Compliance Officer;
- The vendor or supplier who is the subject of the request shall be disqualified from consideration to provide any goods or services to AEP.

Training:

This anti-corruption policy is included in AEP's Principles of Business Conduct, for which all AEP employees receive annual training. Those employees who may interact with Government Officials at any jurisdictional level or direct others to interact with Government Officials will receive annual training regarding this Policy. Any employees who are registered lobbyists or who are likely to engage in lobbying activities under the relevant lobbying laws may receive additional training on this Policy at the discretion of the Company's Chief Compliance Officer.

Annual Certification:

All employees who receive training specific to this Policy, as referenced above, will submit annual certifications stating that they understand, will comply with, and have complied with this Policy.

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 corruption or this policy, immediately contact your supervisor or management; Human Resources; the AEP Concerns Line, toll free, 24 hours a day at 1-800-750-5001 or www.aepconcernsline.com; or, Ethics & Compliance directly at 614-



716-6226. 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 will result in disciplinary action, up to and including termination of employment.

Review / Revision:

Reviewed by:	Chief Compliance Officer	Month Day, Year
Revised by:	Name, Title	Month Day, Year
Approved by:	CEO	Month Day, Year