



# CODE OF CONDUCT

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## Code of Conduct Principles for Employees, Right-of-way Agents and Subcontractor Employees

American Electric Power (AEP) is dedicated to Code of Conduct principles that respect communities, landowners and the environment when building facilities necessary to deliver reliable electric service to our customers.

Our Code of Conduct applies to all communications and interactions with property owners by all employees, right-of-way agents and subcontractor employees representing AEP and its projects during negotiation of right-of-way and the performance of surveying, environmental assessments and the other activities for the Project on property not owned by AEP.

All representatives of the Project are instructed and expected to follow the AEP Code of Conduct principles as outlined in this document and have received AEP Customer Relations Training specifically created for right-of-way agents.

### **Code of Conduct Principle I:**

*All communications for the Project must be based in factual information and made in good faith and adhere to the following standards:*

- Do provide maps and documents necessary to keep landowners properly informed.
- Be truthful. Do not make false or misleading statements, or purposely or intentionally misrepresent any fact.
- Be responsive. If you don't know the answer to a question from a property owner confirm that you will investigate the question and provide a timely answer. Follow-up in a timely manner on all commitments to provide additional information.
- Do not send written communication suggesting an agreement when, in fact, an agreement hasn't been reached.

- If information provided is later determined to be incorrect, the Project representative will follow-up with the landowner in a timely manner and provide corrected information.
- Do provide the landowner with appropriate additional contact information if necessary.

### **Code of Conduct Principle II:**

*All communications and interactions with property owners and occupants of property must be respectful and reflect fair dealing practices, including:*

- Project representatives must promptly identify themselves by showing a company or contractor-issued photo I.D. badge and have it displayed at all times while working on the project.
- Project representatives will promptly identify themselves when contacting a landowner by telephone.
- Project representatives do not engage in behavior that may be considered harassing, coercive, manipulative, intimidating, or causes undue pressure.
- All communications by a property owner, whether in person, by telephone or in writing, in which the property owner indicates that he or she does not want to negotiate or does not want to give permission for surveying or other work on his or her property must be respected and politely accepted without argument. Unless specifically authorized by the Land Acquisition Manager, do not contact the property owner again regarding negotiations or requests for permission.
- When asked to leave a property, promptly leave and do not return unless specifically authorized by the AEP.
- Do obtain written permission from the property owner and tenants to enter property for purposes of surveying or conducting environmental assessments or other activities. Clearly explain to the property owner the scope of work to be conducted based on the permission given. Attempt to notify the occupant of the property each time you enter the property based on this permission. If verbal permission is granted, the agent should record the time and date of the discussion for future reference.
- Do not represent that a relative, neighbor and/or friend supports or opposes the project, even if it's true.

- Do not suggest that any person should be ashamed of or embarrassed by his or her opposition to the Project or that such opposition is inappropriate.
- Do not argue with property owners about the merits of the Project.
- Do not suggest that an offer is "take it or leave it."
- Do not threaten to call law enforcement officers or obtain court orders.
- Do not threaten the use of eminent domain.
- Avoid discussing a property owner's failure to note an existing easement when purchasing the property and other comments about the property owner's acquisition of the property.
- Do not give the property owner any legal advice. Instead advise they contact an attorney about any legal matters.
- If threatened, promptly and politely leave the property and report the issue to the Land Acquisition Manager.

### **Code of Conduct Principle III:**

*All communications and interactions with property owners and occupants of property must respect the privacy of property owners and other persons, as follows:*

- Do not discuss your negotiations or interactions with other property owners or other persons.
- Do not ask relatives, neighbors and/or friends to influence the property owner or any other person.
- Avoid discussions of personal matters about the property owner, others and yourself.

AEP operates with the highest standards of reliability, safety and federal and state compliance. We work with property owners, state regulators, local officials and agencies, customers and communities to ensure a mutually respectful and beneficial outcome.