	HARASSMENT-FREE WORKPLACE POLICY (POL.HR.017)	APPLIES TO: OGE Energy Corp. and Its Majority Owned Subsidiaries
OWNER: Director Ethics, Equity and Inclusion	EFFECTIVE DATE: 12/18/2020	REVISION NO.: 7.1

1.0 SCOPE

This policy applies to members of OGE Energy Corp. and its majority-owned subsidiaries including Oklahoma Gas and Electric Company (the “Company”) and all other individuals who may have contact with any member for a business-related reason.

This policy covers conduct occurring both during the workday and outside of regular work hours when in a business-related setting, including but not limited to seminars, conferences, business trips and business-related social events.

2.0 PURPOSE

The purpose of this policy is to affirm the Company’s commitment to providing an environment of mutual respect that is free from harassment.

The Company is committed to full compliance with all federal, state, and local employment laws and regulations concerning harassment in the workplace.

The reporting process and potential disciplinary actions are contained in this policy.

3.0 POLICY

It is the policy of the Company to prohibit harassment directed toward anyone, on Company property or while conducting Company business.


The Company will take prompt corrective action, including disciplinary action, up to and including termination, for any known violations of this policy.

4.0 REQUIREMENTS

4.1 HARASSMENT

Harassment is unwelcome conduct that has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment. While it is not possible to provide a complete list of all improper behavior, or the myriad of methods that could be used to convey the words or messages constituting harassment, the following examples are prohibited under this policy:

1. Verbal Conduct
 - Making comments, jokes, puns, innuendos, bantering, and teasing which demean, insult, or offend.
 - Expressing words, slurs, names, or statements which demean, insult, or offend.
2. Physical Conduct

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- Intimidating, coercing, or taking negative or harmful action against, or threatening to take negative or harmful action against a person.
 - Leering, gawking, or making other nonverbal gestures which demean, insult, or offend.
3. Offensive Imagery
- Displaying drawings, posters, cartoons, or images in the work environment that are offensive and discriminatory toward other people.

Members shall report, as noted below, any behavior that they believe constitutes harassment regardless of the alleged harasser's position, title, pay grade, supervisory responsibility, or employment status with the Company.


4.2 SEXUAL HARASSMENT

Sexual harassment means unwelcome sexual advances, requests for sexual favors, and all other verbal or physical conduct of a sexual or otherwise offensive nature, that:

1. Unreasonably interferes with an individual's work performance or creates an intimidating, hostile, or offensive work environment or
2. Is used as the basis for decisions affecting an individual's employment, or
3. The conduct either implicitly or explicitly is a term or condition of employment.

While it is not possible to provide a complete list of all improper sexually harassing behaviors, or the myriad of methods that could be used to convey the words or messages constituting harassment, the following examples are prohibited under this policy:

1. Verbal Conduct
 - Requesting sexual favors in return for rewards on the job.
 - Making sexually charged comments about appearance, or other personal or physical characteristics, such as words, jokes, pranks, intimidation, or physical violence.
2. Unwelcome Conduct
 - Making sexually offensive advances and/or body contact such as groping, kissing, rubbing, massaging, or purposely brushing up against another person.
3. Offensive Imagery
 - Displaying or sharing sexually offensive images such as posters, videos, photos, cartoons, screensavers, or drawings by email, letter, note, fax, social media posts, or other forms of communication.

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5.0 ROLES AND RESPONSIBILITIES

5.1 INDIVIDUAL RESPONSIBILITY AND REPORTING

To enforce this policy, the Company relies on the full cooperation of members to bring any incident to its immediate attention because harassment is often private and can be difficult to detect. This reporting expectation applies to the person experiencing the potential harassment as well as any witness to the incident.

Members who believe they are being harassed should ask the person involved to stop the offensive conduct, and the person should immediately stop. If the behavior continues after informing the person to stop, or if the member does not feel comfortable approaching the person, the member should immediately report the potential harassment using one of the following methods:


1. Notify your first- or next-level supervisor,
2. Notify your Human Resources Business Partner or HR Operations Specialist,
3. Call the OGE mPOWERLINE at 1-877-TELLOGE (835-5643),
4. Report it online [here](#),
5. Contact OGE Sr. Manager of HR Operations at 405-553-3586 or brownsl@oge.com
6. Contact OGE's Director of Ethics, Equity and Inclusion at 405-553-3446 or royalrr@oge.com.

Reports of sexual harassment need to be made promptly or within a reasonable period of time. Failure to make a timely report could cause the Company response to be unavoidably limited due to the passage of time.

5.2 MANAGERS AND SUPERVISORS

All managers and supervisors have the responsibility to create, uphold, and promote a safe, respectful, and inclusive work environment to include the following obligations (not all-inclusive):

1. Educate yourself on this policy and all forms of harassment.
2. Create and maintain harassment-free work environments. Be conscious of the work environment in an effort to uncover potential harassment or retaliatory behaviors, and then work with Human Resources or HR Compliance and Employee Relations to immediately address any potential problems.
3. Take every incident or complaint seriously. Notify Human Resources immediately if you, your supervisor, manager, or member reports what they believe to be harassment.
4. Apply this policy consistently.
5. Avoid behaviors that could be interpreted as harassment or retaliation.
6. Conduct annual, interactive reviews of this policy with your managers, supervisors, and members to reinforce the Company's prohibition of harassment in any form.
7. Inform members of their right to report inappropriate conduct without fear of retaliation.

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5.3 MEMBERS

All members of the Company are responsible for the following:

1. Know the provisions of this policy.
2. Comply with the requirements of this policy.
3. Report conduct prohibited by this policy.
4. Cooperate with any investigation undertaken pursuant to this policy.
5. Avoid behaviors that could be interpreted as harassment or retaliation.

6.0 NON-RETALIATION

Members have the right to report inappropriate conduct without fear of retaliation. Everyone is responsible for reporting harassing behaviors, even if the action is not directed at you.

The Company prohibits any form of retaliation against members for bringing forward complaints in good faith, providing information about harassment they are aware of, or cooperating in an investigation of harassment.

However, individuals who intentionally make false allegations of harassment will be subject to disciplinary action up to and including termination.

Any person found to have violated the non-retaliation aspect of this policy will be subject to disciplinary actions up to and including termination. If you experience, witness, or observe retaliation, please report it immediately using one of the reporting methods noted below:


1. Notify your first- or next-level supervisor,
2. Notify your Human Resources Business Partner or HR Operations Specialist,
3. Call the OGE mPOWERLINE at 1-877-TELLOGE (835-5643),
4. Submit a report online at [EthicsPoint.com](https://ethicspoint.com),
5. Contact OGE Sr. Manager of HR Operations at 405-553-3586 or browns1@oge.com
6. Contact OGE's Director of Ethics, Equity and Inclusion at 405-553-3446 or royalrr@oge.com.

7.0 INVESTIGATIONS

Complaints will be investigated promptly, impartially, and confidentially to the extent possible, while still allowing for a thorough investigation. The investigatory process will allow the complainant, the accused, and any known witnesses an opportunity to relate their observation or knowledge of facts.

To facilitate the investigation, members may be required to take "*Leave With Pay*" while the investigation is being conducted. Such leaves *are not* considered a disciplinary measure.

If information obtained during the investigation determines harassment has occurred, the Company will take prompt and appropriate corrective action against the member responsible for the

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harassment or retaliation, up to and including termination. While some information will be shared with the complainant following an investigation, specific details about the actions taken by the Company may not be shared due to confidentiality concerns.

8.0 ASSOCIATED POLICIES AND DOCUMENTS

- AD.033.2 [Corporate Physical Security](#)
- AD.035 [Conflict of Interest](#)
- AD.039 [Social Media](#)
- HR.010 [Equal Employment Opportunity](#)
- HR.011 [Employee Relationships](#)
- HR.020 [Open Door](#)
- HR.047 [Workplace Violence](#)

AND

[Code of Ethics](#)