	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: 12/20/2024	REVISION NO.: 9

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”), vendors, visitors, 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 travel, and business-related social events.

2.0 PURPOSE

The purpose of this policy is to affirm the Company’s commitment to providing respectful and safe work environments, which is any place where members are engaged in work for the company, including virtual locations.

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


This policy outlines the reporting process, safeguards against retaliation, and measures to maintain confidentiality.

3.0 POLICY

It is the policy of the Company to prohibit harassment directed toward anyone, on Company property or virtually while conducting Company business or representing the company in any capacity.

The Harassment-Free Workplace policy applies equally to harassment based on a member’s race, ethnicity, religion, color, sex (including gender, gender identity, and sexual orientation), creed, parental status, national origin, ancestry, age, physical or mental disability, citizenship, family medical history or genetic information, pregnancy (including pregnancy-related factors), past, present, or prospective service in the uniformed services, or any other characteristic protected under applicable federal, state, or local law.

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

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4.0 REQUIREMENTS

4.1 HARASSMENT

Harassment, for the purposes of this policy, is defined as unwelcome conduct that unreasonably interferes with an individual’s work performance or creating an intimidating, hostile, or offensive work environment.

Harassment can take various forms, including verbal, physical, emotional, and online behaviors. Each of these can profoundly impact individuals, creating a hostile or intimidating environment that undermines their well-being and sense of safety. It is essential to recognize these different manifestations to address and prevent harassment in all its forms effectively.

While it is impossible to provide a complete list of all improper behaviors or the myriad of methods that could be used to convey the words or messages constituting harassment, the examples below provide an illustrative but non-exhaustive list of conduct prohibited under this policy.

- Saying or writing an ethnic, racial, or sex-based slur
- Forwarding an offensive or derogatory “joke” email
- Displaying offensive material (such as a noose, swastika, or other hate symbols, offensive cartoons, photographs, or graffiti)
- Threatening or intimidating a person because of their religious beliefs or lack of religious beliefs
- Sharing pornography or sexually demeaning depictions of people, including AI-generated and deepfake images and videos
- Making comments based on stereotypes about older workers
- Mimicking a person’s disability
- Mocking a person’s accent
- Making fun of a person’s religious garments, jewelry, or displays
- Asking intrusive questions about a person’s sexual orientation, gender identity, gender transition, or intimate body part
- Groping, touching, or otherwise physically assaulting a person

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- Making sexualized gestures or comments towards a person, even when this behavior is not motivated by a desire to have sex with them
- Threatening a person’s job or offering preferential treatment in exchange for sexual favors

Members are encouraged to report any behavior they perceive as harassment. This responsibility is important and applies to everyone, regardless of the alleged harasser’s position with the Company, including their title, supervisory role, or employment status.

4.2 SEXUAL HARASSMENT

Sexual harassment means any harassment based on someone’s sex or gender. It includes harassment that is not sexual in nature (e.g., offensive remarks about an individual’s sex or gender), as well as any unwelcome sexual advances or requests for sexual favors or any other conduct of a sexual nature when any of the following is true:


- Submission to the advance, request, or conduct is made either explicitly or implicitly a term or condition of employment.
- Employment decisions are based on the member’s acceptance or rejection of the requests or conduct.
- These actions, demands, or behaviors are intended to unfairly disrupt a member’s job performance by creating an intimidating, hostile, or offensive work atmosphere.

The Company will not tolerate any form of sexual harassment, regardless of whether it is:

- Verbal: Sexual epithets, sexual statements or slurs, sexually related comments or jokes, unwelcome sexual advances, or requests for sexual favors.

Physical: Assault or inappropriate physical contact such as groping, kissing, massaging, patting, pinching, rubbing, or purposely brushing up against another person.

- Visual: Displaying or sharing sexually suggestive posters, videos, photos, cartoons, screensavers, or drawings (by email, letter, note, fax, social media posts, or other forms of communication), sending inappropriate adult-themed gifts, leering, or making sexual gestures.

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- Online: Derogatory statements or sexually suggestive postings on any social media platform, including Facebook, X (formerly Twitter), Instagram, and Snapchat.

This list is illustrative only and not exhaustive. No form of sexual harassment will be tolerated. All harassment is prohibited in the workplace, regardless of the location, including virtual settings. This also extends to Company-sponsored events.

5.0 ROLES AND RESPONSIBILITIES

5.1 INDIVIDUAL RESPONSIBILITY

To enforce this policy, the Company depends on the good faith and full cooperation of its members to promptly report any incidents of harassment. Because harassment is often private and can be hard to recognize, this reporting expectation applies not only to the person experiencing the potential harassment but also any witnesses, bystanders, and those who are informed about the incident.


If you believe you have been subjected to offensive conduct, it is within your rights to directly ask the individual to cease their behavior. If the behavior continues, escalates, or you believe the conduct is particularly egregious, please report it immediately, ideally within ten (10) calendar days or less of the offending conduct. Failure to make a timely report could cause the Company's response to be unavoidably limited due to the passage of time.

Everyone is responsible for reporting behaviors they perceive as harassing or retaliatory, even if the action is not directed toward them. However, members making intentionally false reports will be subject to disciplinary action, up to and including termination of employment.

5.2 REPORTING METHODS

1. Notify a supervisor or manager
2. Notify a Human Resources Business Partner (HRBP)
3. Call the OGE mPOWERLINE at 1-877-TELLOGE (835-5643)
4. Visit www.ethicspoint.com to report online through the mPOWERLINE
5. Contacting the Sr. Manager of HR Operations at 405-553-3019 or cinkdb@oge.com
6. Contacting the Director of Ethics, Equity, and Inclusion at 405-553-3446 or royalrr@oge.com

Although use of any of the reporting methods is encouraged, situations requiring immediate action should be addressed in person with a supervisor, manager, or HR.

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5.3 REPORTING PROCEDURES

If you experience, witness, or are informed of any conduct you believe violates this policy, you must promptly speak to an HRBP or report it using one of the Reporting Methods listed in Section 5.2.

When making a report of harassment, it should be as detailed as possible. Additionally, it is important that you provide your name, all other individuals involved, and any witnesses. Identifying yourself enables the investigator to follow up directly with you to gather more detailed information and clarify any aspects of your report. This personal interaction ensures a thorough and accurate investigation, allowing us to address the issue more effectively and provide you with the necessary support. While anonymous reports are taken seriously, having a direct line of communication significantly enhances our ability to resolve the matter promptly. It ensures your concerns are fully understood and acted upon.


If you report harassment and have not received a response within five business days after reporting the incident, please immediately contact the Director of Ethics, Equity, and Inclusion at royalrr@oge.com or (405) 553-3446 or the Ethics/Employee Relations Investigator at humphrk@oge.com or (405) 553-2752.

The Company will ensure a prompt and thorough investigation of the facts and circumstances of all claims of perceived harassment and take corrective action as appropriate.

5.4 MANAGER AND SUPERVISOR RESPONSIBILITIES

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

1. **Know the Policy:** Review, understand, abide by, and enforce the Harassment-Free Workplace policy.
2. **Create and Maintain a Harassment-Free Work Environment.** Be attentive to the work environment to uncover potential harassment or retaliatory behaviors, and then work with your HRBP to address any potential problems.
3. **Take Every Incident or Complaint Seriously.** If you receive a report or observe offensive conduct, notify Human Resources immediately.
4. **Consistently Apply the Policy:** Be consistent when applying this policy.
5. **Promote Reporting and Non-Retaliation:** Encourage members to report behavior they believe constitutes harassment and ensure no retaliation against those who report in good faith.

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6. **Maintain Confidentiality to the Extent Possible:** It is crucial to maintain confidentiality when handling reports of potential harassment. This ensures that the individuals involved feel safe and protected. By safeguarding the privacy of all parties, the investigator can conduct a thorough and unbiased investigation.

5.5 MEMBER RESPONSIBILITIES

The Company expects all members to adhere to the following guidelines:


1. **Read and Understand the Policy:** Thoroughly read and understand all aspects of the Policy to ensure you are fully informed.
2. **Comply with the Requirements:** Act in accordance with the established standards and procedures outlined in the Policy, demonstrating a commitment to ethical practices and organizational values.
3. **Report Prohibited Conduct:** Be vigilant in identifying any behavior you believe violates this Policy and promptly report such incidents using one of the reporting methods listed in Section 5.2.
4. **Cooperate with Investigations:** Engage fully and transparently with any inquiries or investigations related to the Policy, providing necessary information and support to facilitate a thorough and impartial examination of the matter.
5. **Avoid Behaviors That Can Be Interpreted as Harassing or Retaliatory:** Maintain a professional demeanor in all interactions, avoiding any actions or comments that can be perceived as harassing or retaliatory in nature.

6.0 PROHIBITION OF RETALIATION

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

Retaliation occurs when adverse action is taken against an individual in response to them having reported misconduct, participated in an investigation, refused to participate in suspected improper activity, or exercised workplace rights protected by law. Members have the right to report inappropriate conduct without fear of negative consequences.

Retaliation is any form of adverse action, direct or indirect, taken against a person for reporting misconduct or otherwise exercising their rights protected by the law. Retaliation can take many forms, including (non-exhaustive list):

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- Avoidance
- Demotion
- Exclusion
- Failure to Promote
- Increased Scrutiny
- Job Reassignments (e.g., change of work location, change in work hours)
- Punitive Assignment
- Salary Reduction
- Suspension
- Termination
- Withholding Training

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 are made aware of potential retaliation, please report it immediately using one of the methods listed in Section 5.2.


7.0 INVESTIGATIONS

The Company is committed to promptly and thoroughly investigating any allegations of potential harassment. Impartial, effective, and thorough investigations will be conducted. After the investigation is completed, appropriate corrective actions, which may include disciplinary measures, will be implemented to address the violations and prevent future occurrences as appropriate.

When a report of harassment is received, it will be acknowledged within five (5) business days when possible. The primary goal of the investigation is to gather all relevant facts that will help us assess and respond appropriately to the allegation. Throughout this process, the reporter, the accused, and any known witnesses will have the opportunity to share their observations and insights regarding the situation. It is essential for all involved to cooperate fully and act in good faith during the investigation—this means attending meetings, being truthful, and promptly providing any requested information. Participants should understand that they may not receive detailed information about the allegation to protect the integrity of the investigation.

The Company cannot guarantee participants complete confidentiality; although information collected during the investigation may be classified as “*Company Confidential, Highly Sensitive Information*” or “*Attorney-Client Privileged.*”

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. However, such Leave with Pay may be converted to Leave without Pay if the member is subsequently found to have engaged in conduct violating this policy.

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If the information obtained during the investigation determines harassment or retaliation has occurred, the Company will take prompt and appropriate corrective action up to and including termination.

Specific details related to the actions taken by the Company may not be shared due to privacy and 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](#)

9.0 VERSION HISTORY

Effective Date	Action	Author
01/12/2024	Policy Updated	Rose Royal
12/06/2024	Policy Reviewed	Rose Royal
12/11/2024	Policy Revisions Reviewed	Ruseal Brewer
12/11/2024	Policy Revisions Reviewed	Scott Briggs
12/20/2024	Committee Approved	Deanna Brouillette