



DOING BUSINESS **RIGHT** **OUR CODE OF CONDUCT**



A MESSAGE FROM JOHN DYER

Dear Cox Employee:

Since our founding in 1898, our company has grown from a single newspaper with five reporters to a global enterprise with more than 55,000 employees across 25 countries. I am very proud of this journey and all the people who have contributed to our success.

As we continue to expand to new markets and industries, we must stay true to the simple, but enduring values that have guided our company for nearly 120 years: Do what is right for our employees and customers. Give back to the communities where we live and work.

These simple principles are the cornerstone of our success. They have earned us the trust and respect of our colleagues, customers and communities. As our company grows, we must continue to foster a culture that puts people first and upholds fundamental values such as honesty, integrity and accountability.

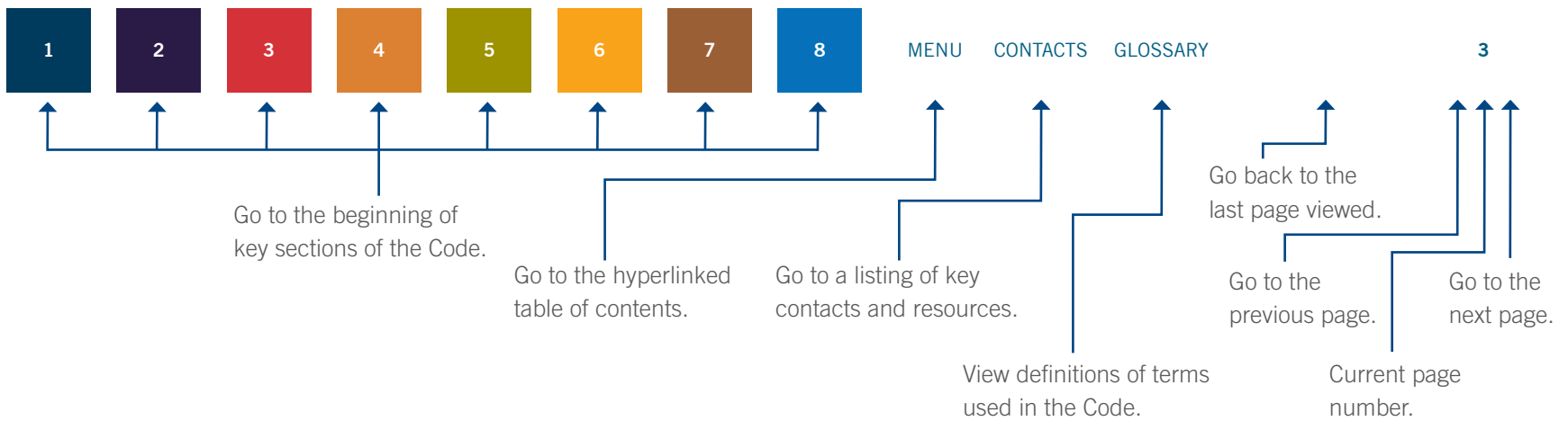
Our Code of Conduct reinforces our pledge to always do the right thing. It ensures that our commitment to operating with the highest ethical standards will never change.

I encourage you to become familiar with the Code and refer any questions to your manager, HR representative or Compliance Officer. Thank you for your dedication to our company and the Cox values.

Sincerely,

JOHN DYER
PRESIDENT AND CEO
COX ENTERPRISES





HOW TO USE THIS PDF

This interactive PDF includes built-in interactivity to aid navigation and provide easy access to resources.

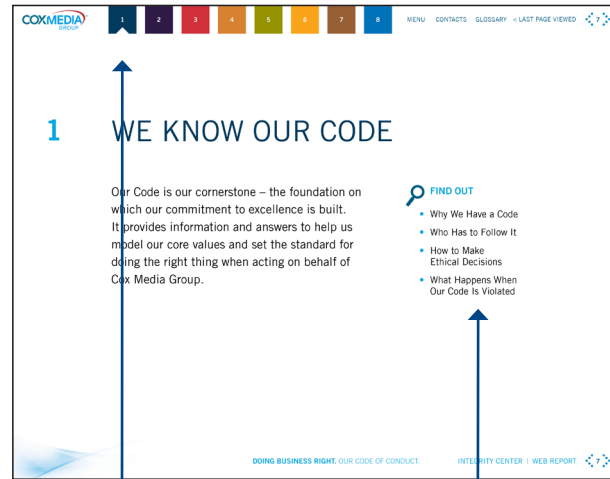
This page provides a description of these features.

SEARCH – Press Ctrl+ F to access the Adobe Acrobat search tool.

HYPERLINKS – Blue underlined text is clickable.

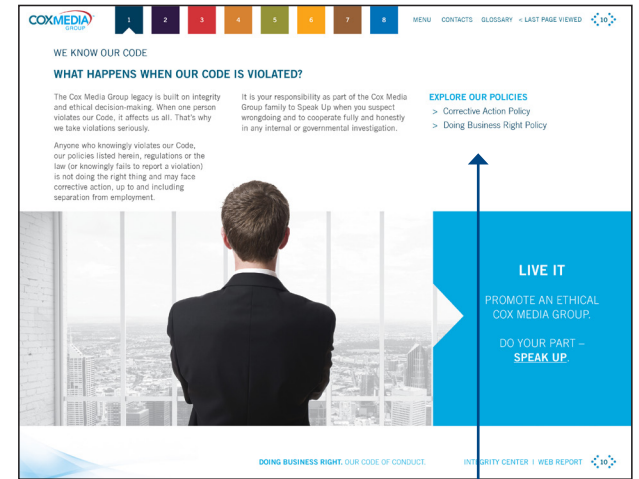
DEFINITIONS – Words defined in the glossary are linked to the Glossary page.

Policies can also be found on CMG ConneX.



The white triangle shows the section you are in.

Each section title includes links to the covered topics.



Links to resources and related content are blue and underlined.

Go to the previous page.

Go to the next page.

CONTENTS MENU

Items listed on this page function like links in a web browser.

Click on an item to visit that page.

A Message From John Dyer	2
How to Use This PDF	3
We Are Guided by Our Values	5
A Message From Kim Guthrie	6
1 WE KNOW OUR CODE	7
Why a Code?	8
Who Has to Follow It?	8
What Is Ethical Decision-Making?	9
What Happens When Our Code Is Violated?	10
2 WE HONOR OUR RESPONSIBILITIES	11
Together ... We Put Our Values Into Practice	12
Share Concerns	13
We Don't Tolerate Retaliation	14
Are You a People Leader?	14

3 WE PROMOTE AN INCLUSIVE WORKPLACE	15
We Celebrate Our Diverse Workforce	16
We Respect Each Other	17
4 WE CONDUCT BUSINESS LAWFULLY	18
We Respect the Privacy of Others	19
We Follow the Law	20
• Antitrust and Competition Laws	20
• Anti-Bribery/Anti-Corruption Laws	20
• Insider Trading Laws	21
5 WE UNDERSTAND OUR RESPONSIBILITY TO OTHERS	22
We Maintain a Safe and Healthy Workplace	23
We Honor the Promises We Make to Our Customers	24
We Understand Our Responsibility to Our Audiences	24
We Conduct Business Honestly and Ethically	24
• With Our Suppliers	
• With Our Competitors	
6 WE DO THE RIGHT THING	25
We Avoid Conflicts of Interest	26
We Comply With All Applicable Broadcasting Requirements	27

We Understand the Rules About Gifts and Entertainment	27
We Are Responsible When Communicating About Cox Media Group	28
7 WE SAFEGUARD OUR COMPANY'S ASSETS	30
We Protect Our Assets	31
We Maintain Accurate Records	34
8 WE ARE GOOD NEIGHBORS	35
We Give Back	36
• Charitable Contributions	36
• Political Activities	36
• Lobbying	36
• CoxPAC	36
We Are Good Stewards	37
Environmental – Cox Conserves	37
We Protect Human Rights	37
Closing Thoughts: A Message From Our Compliance Officer	38
Glossary	39
Index	41
Contacts	42

WE ARE GUIDED BY OUR VALUES

Our values have always inspired our work. Governor James M. Cox once said, “Ask yourself one question, ‘Is it right?’ Then do what you believe is right for your town, your state and your company.”

Today, we still live by his words. Our commitment to doing what’s right has helped us earn our success and reputation, moving business forward. We strive to act with integrity, live by our values and always **Act Now. Be Bold. Stay True.** in everything we do.

At Cox Media Group we do that with **Speed, Passion and Courage!**



COX VALUES

EMPLOYEES

Our employees are our most important resource. We encourage entrepreneurship and initiative. We recognize and reward achievement.

CUSTOMERS

Our customers are our lifeblood. We’re dedicated to building lasting relationships with them and meeting their needs with high-quality service beyond their expectations.

DIVERSITY

We are committed to having a diverse workforce that reflects the communities we serve. We embrace and foster an environment that builds on the unique talents that come from a variety of people and perspectives.

COMMUNITY

We believe it’s good business to be good citizens of the communities we serve through volunteerism and financial support.

TECHNOLOGY

We embrace new technology to give our customers the variety and quality of services they demand.

INVESTMENT

We invest in new business opportunities with a mixture of caution and initiative, to enhance our growth.

ENVIRONMENT

We are committed to helping shape a better world through responsible company and individual actions.

A MESSAGE FROM KIM GUTHRIE

Dear Cox Media Group employees,

At Cox Media Group, we compete with our products and win with our people. That's why it's important for all of us to remember that the actions we take reflect on who we are as a company. What do our actions say about us? They say that we are a company that is honest and fair – a company that embraces the greater good. Our actions also say that we are a company that values its integrity above all else.

Our company started in the media business in 1898 when Governor Cox purchased his first newspaper, and our reputation is our legacy. We continue building on that through honoring a tradition of excellence and making the right choices for ourselves and for our Cox Media Group brands. The actions we take today preserve our legacy for the future and support our vision to be the most essential local media source in our markets.

Our Code of Conduct: Doing Business Right contains our core beliefs. It is a resource to help us continue operating with integrity. It outlines our policies, procedures and the values that make us who we are. Though it will not have the answer for every situation, it provides tools to help you find the answers you need.

Our Compliance Officer, Amber Hall, is a partner in helping you make ethical decisions. She is available to help you understand the laws and regulations that apply to our industry. Work with her to safeguard our reputation.

All of us play an important role in ensuring that our reputation – our legacy, is protected. Each of us has a responsibility to uphold our values and act with integrity. I encourage you to read our Code, understand our values and make sure that you act in accordance with our standards. We are counting on you to do your part to help us preserve our legacy.

Thank you for being a member of Cox Media Group and for your commitment to working with integrity.

Sincerely,

KIM GUTHRIE
PRESIDENT
COX MEDIA GROUP



1 WE KNOW OUR CODE

Our Code is our cornerstone – the foundation on which our commitment to excellence is built. It provides information and answers to help us model our core values and set the standard for doing the right thing when acting on behalf of Cox Media Group.



FIND OUT

- Why We Have a Code
- Who Has to Follow It
- How to Make Ethical Decisions
- What Happens When Our Code Is Violated

WE KNOW OUR CODE

WHY A CODE?

We have a Code to ensure you have the answers you need to do your job in a lawful and ethical manner.

Our Code provides an overview of the laws, regulations and certain company policies that affect our business as well as some resources we can reach out to for help. It doesn't just tell us how to work, but how to embrace our values in every business decision and action we take.

So what does that mean?

It means doing things the right way. Making decisions guided by integrity and ethics. It's about keeping our promises. Honoring our values. Doing business as a trusted partner, the way we've done it for more than a century.

WHO HAS TO FOLLOW IT?

As an employee of Cox Media Group, each of us has a responsibility to know and follow our Code and to ask questions about issues that are unclear. We also have a responsibility to communicate with each other and our partners about the standards we've put in place to ensure our company is one of the best to work for and with.

If your employment is covered by a written contract, the terms and conditions of your employment may vary from the Code or the policies referenced herein, but we still expect you to perform your job ethically and with integrity.



OUR CODE OF **CONDUCT**
LEARN IT. SIGN IT. LIVE IT.

WE KNOW OUR CODE

WHAT IS ETHICAL DECISION-MAKING?

Remember, our Code is **the starting point, not the finish line**. It lays out the basic standards for how we conduct business but it doesn't have the answer to every question you might have or every situation you might face.

NOT SURE OF WHAT TO DO? ASK YOURSELF:

The graphic consists of four large dark blue circles arranged horizontally, each containing a question. Below each circle are three smaller circular buttons: a red one for 'NO. STOP.', an orange one for 'NOT SURE? SEEK HELP.', and a green one for 'YES.' with a white arrow. The fourth question has a separate text box below it.

- IS IT LEGAL?**
 - NO. STOP.
 - NOT SURE? SEEK HELP.
 - YES.
- DOES IT COMPLY WITH OUR CODE OR POLICIES?**
 - NO. STOP.
 - NOT SURE? SEEK HELP.
 - YES.
- IS IT GOOD FOR COX MEDIA GROUP AND RESPECTFUL OF MY CO-WORKERS?**
 - NO. STOP.
 - NOT SURE? SEEK HELP.
 - YES.
- WOULD IT SERVE THE PUBLIC INTEREST?**
 - NO. STOP.
 - NOT SURE? SEEK HELP.
 - YES.

THE ACTION IS PROBABLY OKAY. STILL NOT SURE? ASK FOR HELP.

WE KNOW OUR CODE

WHAT HAPPENS WHEN OUR CODE IS VIOLATED?

The Cox Media Group legacy is built on integrity and ethical decision-making. When one person violates our Code, it affects us all. That's why we take violations seriously.

Anyone who knowingly violates our Code, our policies listed herein, regulations or the law (or knowingly fails to report a violation) is not doing the right thing and may face corrective action, up to and including separation from employment.

It is your responsibility as part of the Cox Media Group family to Speak Up when you suspect wrongdoing and to cooperate fully and honestly in any internal or governmental investigation.

EXPLORE OUR POLICIES

- > Corrective Action Policy
- > Doing Business Right Policy



LIVE IT

PROMOTE AN ETHICAL
COX MEDIA GROUP.

DO YOUR PART –
SPEAK UP.

2 WE HONOR OUR RESPONSIBILITIES

We're passionate about our company. That's why we always strive to do what's right. No matter what job we do or where we do it, we're committed to the highest standards of business conduct.



FIND OUT

- About Your Responsibilities
- How to Share Concerns
- How We Don't Tolerate Retaliation
- About People Leaders' Responsibilities

WE HONOR OUR RESPONSIBILITIES

TOGETHER ... WE PUT OUR VALUES INTO PRACTICE

Conduct business legally and ethically. Preserve the trust that others have placed in us. Be sure there's no difference between what you say you will do and what you do.

Know the policies and procedures that apply to your job. Be aware that some markets and locations, business groups or departments have policies that apply only to employees in their area.

Complete your mandatory training. It will help you in not only knowing our policies and procedures, but also applying them to your everyday work.

Use the Code. Re-visit Code features to keep ethical issues top-of-mind.

Ask questions. It's the best way to be certain you're on the right path. Always remember: there [are people who want to help you](#).

Take action. If you see or suspect a violation of our Code, say something. Speaking up isn't just a good idea, it's your duty and required by our Code. It helps make our company a better place to work.

WHAT IF...

THERE'S A CONFLICT BETWEEN THE CODE AND A POLICY IN MY DEPARTMENT?

Follow the Code. Bring the conflict to the attention of your supervisor and HR representative.



WE HONOR OUR RESPONSIBILITIES

SHARE CONCERNS

If you have a problem or concern, you should generally address it first with your immediate supervisor. Our “Open Door – Problem Resolution Policy” means you are free to talk to your supervisor any time about any problems or concerns. If you are uncomfortable discussing your concerns with your supervisor, or if you are unsatisfied with your supervisor’s response, the Policy provides you with other avenues to address your concerns including speaking with your HR representative.

The Ethics Hotline is accessible by phone or web and allows you (anonymously, if you wish) to ask questions or share your concerns 24 hours a day, 7 days a week with an independent, third-party interview specialist.

ETHICS HOTLINE

CoxEthicsHotline.EthicsPoint.com

When you contact the Ethics Hotline, the information you provide is documented in detail and forwarded to the appropriate office within Cox Media Group for investigation.

The Division General Counsel and the CMG Legal Department also work with Human Resources to help you understand any requirements Cox Media Group has under the law.

No matter who you contact or what resource you choose, your concern will be promptly reviewed and investigated and handled with the appropriate level of confidentiality. Keep in mind, it may not be appropriate for the results of an investigation to be communicated back to you in light of our obligation to protect privacy and confidentiality, but you will have the ability to know whether the review or investigation has been completed and closed.

DID YOU KNOW?

YOU CAN REPORT CONCERNS ABOUT:

- Discrimination or harassment
- Workplace violence, threats or bullying
- Conflicts of interest
- Theft, fraud or bribery
- Environmental or safety issues
- Inappropriate gifts or entertainment
- Accounting or financial issues
- Code violations
- Policy violations
- Retaliation
- Other threatening or concerning behavior

Note that these are just examples, not an exhaustive list. Any time you see or suspect something that could harm Cox Media Group, our employees or our customers, **Speak Up**. By reporting misconduct, you help contribute to the ethical culture of our company.

EXPLORE OUR POLICIES

- > Ethics Hotline Reporting Policy
- > Open Door – Problem Resolution Policy
- > Anti-Retaliation Policy

GOT A QUESTION?

NEED ADVICE?

SUSPECT A VIOLATION?

**SEE SOMETHING?
SAY SOMETHING.**

SPEAK UP.



WE HONOR OUR RESPONSIBILITIES

WE DON'T TOLERATE RETALIATION

We want you to feel comfortable coming forward so, as a company, we don't tolerate retaliation against anyone who speaks up, in good faith, about unethical or illegal behavior.

See our Anti-Retaliation Policy to learn more. If you think that you or someone you know has been retaliated against for raising an issue, Speak Up.

WHAT IF...

THE CONCERN I WANT TO RAISE IS ABOUT MY SUPERVISOR. WILL I LOSE MY JOB?

The best place to raise your concerns would typically be with your immediate supervisor, but because it's your supervisor's conduct that concerns you, calling your HR representative or the Ethics Hotline are good options. If you call the Ethics Hotline, you'll speak to an interview specialist who doesn't work for Cox Media Group. By reporting misconduct and speaking up, you have the assurance of knowing that the situation will be investigated. Retaliation by anyone, including your supervisor, will not be tolerated.

EXPLORE OUR POLICIES

- > Open Door – Problem Resolution Policy
- > Anti-Retaliation Policy

ARE YOU A PEOPLE LEADER?

You have a special responsibility to lead with integrity. Set a good example for your team and show them, through your everyday words and actions, that you do business honestly and in compliance with our Code.

Be the kind of leader who people feel comfortable approaching.

- Promote our Open Door – Problem Resolution Policy.
- Support employees who come forward in good faith to share their concerns or raise questions.
- Listen, take good notes and work together with your HR representative to resolve issues as quickly and effectively as possible.
- Seek Help if you're not sure of the right way to go.
- Make sure employees aren't subjected to retaliation for speaking up.
- Properly report allegations of noncompliance.

WHAT'S "GOOD FAITH"?

Honestly believing in what you're doing. Sharing a concern "in good faith" means that you believe that there's a violation of law or our company policies and that you're not deliberately making a false report.

LIVE IT
IF YOU'RE A PEOPLE LEADER, BE A ROLE MODEL FOR ETHICAL CONDUCT.



3 WE PROMOTE AN INCLUSIVE WORKPLACE

The best thing about Cox Media Group? Our employees. We blend our unique experiences, perspectives and talents together to create an amazing team.



FIND OUT

- About Our Diverse Workforce
- How We Work Toward a Harassment-Free Cox Media Group

WE PROMOTE AN INCLUSIVE WORKPLACE

WE CELEBRATE OUR DIVERSE WORKFORCE

Think about families. Although they may be alike in some ways, each member has a different way of looking at things, a different way of saying things, a different way of doing things.

The Cox Media Group family is no different. While we're all passionate about providing our customers with the very best experiences, each of us brings a different idea for powering that passion. It's that diversity of backgrounds, of cultures and viewpoints that drives our success.

Our commitment to diversity and inclusion is reflected in our everyday hiring and employment practices. At Cox Media Group we want all of our employees to "Be Yourself, Make Us Better." Diversity and inclusion are values we take seriously, which is one of the reasons why our Diversity and Inclusion Advisory Group was awarded the 2013 Diversity Council Honors Award. You're not like anyone else, and we're glad about that.

We provide equal employment opportunities and don't discriminate against anyone on the basis of race, color, religion, sex, pregnancy, national origin, age, veteran status, disability, genetic information, sexual orientation, gender identity/expression and any other factor protected by law.

As part of our commitment to providing equal employment opportunities, we provide reasonable accommodations to qualified individuals with disabilities. We also provide reasonable accommodations for religious observances or practices. If you believe you need an accommodation due to a disability or a religious belief, please discuss your request for accommodation with your supervisor or HR representative.

EXPLORE OUR POLICIES

- > Equal Employment Opportunity Policy
- > Anti-Harassment Policy
- > Anti-Retaliation Policy

DID YOU KNOW?

OUR EQUAL EMPLOYMENT OPPORTUNITY POLICY APPLIES TO ALL ASPECTS OF EMPLOYMENT INCLUDING THINGS LIKE:

- Getting a job at Cox Media Group or one of its subsidiaries
- Performance evaluations
- Promotions and advancement
- Pay and certain benefits
- Discipline and separation
- Participation in company-sponsored employee activities, events and programs



LIVE IT

HONOR INDIVIDUAL EXPERIENCES, CULTURES AND PERSPECTIVES.
 THINK ABOUT HOW YOUR WORDS AND ACTIONS ARE PERCEIVED BY OTHERS.
 LIVE OUR VALUES.

WE PROMOTE AN INCLUSIVE WORKPLACE

WE RESPECT EACH OTHER

We care about each other and work together to promote a workplace free of harassment. We don't tolerate any behavior (whether verbal, visual, physical or sexual) that would create an offensive, hostile or intimidating environment.

EXAMPLES OF HARASSMENT

- Joking about someone's race or ethnic background
- Unwelcomed hugging or touching
- Unwanted and repeated sexual jokes, flirtation, advances or propositions
- Discussing sexual activities or desires or displaying obscene pictures, cartoons or posters
- Posting or circulating materials that degrade or express hate against someone because of sex, race, color, religion, national origin, disability or other factors protected by law

We support the rights of employees to speak out publicly about matters of public concern or to participate in certain activities related to the terms and conditions of their employment. Nothing in this Code or in any of our policies is intended to limit or interfere with your right to engage in concerted activities protected under Section 7 of the National Labor Relations Act, including discussions related to wages, hours, working conditions, health hazards and safety issues.

EXPLORE OUR POLICIES

- > Anti-Harassment Policy
- > Ethics Hotline Reporting Policy
- > Open Door – Problem Resolution Policy
- > Anti-Retaliation Policy



WHAT IF...

SOMEONE I AM INTERVIEWING FOR A STORY MAKES OFFENSIVE JOKES ABOUT MY ETHNIC BACKGROUND. WHAT SHOULD I DO?

At Cox Media Group, we do not tolerate any behavior that creates an offensive or hostile environment for our employees. If someone is being disrespectful to you while you are doing your job, [Speak Up](#). Tell him to stop making the jokes. If the individual continues, then stop the interview and report the situation to your supervisor.

LIVE IT

TREAT EVERYONE FAIRLY AND WITH RESPECT. DON'T SINGLE OUT SOMEONE (OR A GROUP) BASED ON THEIR BACKGROUND, APPEARANCE OR OTHER PERSONAL CHARACTERISTICS.

SPEAK UP, WITHOUT FEAR OF RETALIATION, IF YOU SEE OTHERS BEING TREATED IN A WAY THAT VIOLATES OUR POLICIES, OUR CODE OR THE LAW.

4 WE CONDUCT BUSINESS LAWFULLY

We honor not just the letter of the law (the actual words) but also the spirit of the law. Our commitment helps to build trust, protect our brand and secure our future.



FIND OUT

- How We Respect Privacy
- How We're Pro-Competition
- How We're Anti-Bribery
- How We Protect Inside Information

WE CONDUCT BUSINESS LAWFULLY

WE RESPECT THE PRIVACY OF OTHERS

Keeping personal information safe is the foundation of trust.

Our customers count on us to respect their privacy, provide transparent processes, honor their choices and protect their personal information.

Our fellow employees expect that we will respect their personal information, so that each of us can focus on providing the best service to our customers.

We are committed to keeping personal information safe and secure. We treat our customers' and employees' personal information the same way we would expect others to treat our own personal information. Our use of personal information must clearly meet a responsible business need and be consistent with the purposes for which it was collected and the consent obtained at the time of collection.

WE:

- Collect only the personal information that we need.
- Are open and transparent about how we collect, use and disclose personal information.

- Provide appropriate choice and access regarding personal information.
- Take reasonable steps to keep personal information secure.
- Properly destroy any personal information we have that is no longer needed for business purposes.
- Provide prompt notification (in accordance with applicable laws) if personal information has been compromised.
- Comply with all policies, processes and guidelines to protect the security of customer and employee information.
- Take the appropriate and required training to understand our privacy and information security obligations.
- Report violations of any policy, process or guideline.
- Recognize that the security and privacy of personal information is everyone's responsibility.

EXPLORE OUR POLICIES

- > Personal Data Security Policy
- > Confidential and Proprietary Information Policy



LIVE IT

PROTECT PERSONAL INFORMATION AS IF IT WERE YOUR OWN.

KNOW THE RULES WHEN IT COMES TO RESPECTING THE PERSONAL INFORMATION OF OUR CUSTOMERS AND OUR CO-WORKERS.

WE CONDUCT BUSINESS LAWFULLY

WE FOLLOW THE LAW

We're subject to many laws and regulations.

ANTITRUST AND COMPETITION LAWS

Antitrust laws help to ensure fair and normal business competition by prohibiting such activities as price fixing, price discrimination and certain product purchase requirements. Violating antitrust and competition laws can result in criminal prosecution as well as significant financial penalties. Cox Media Group employees should not enter into any agreements or arrangements with other parties (competitors, vendors, customers, etc.) that could illegally limit or restrict competition.

Be fair and honest in your business dealings. Avoid even the appearance of anything that could suggest something unfair or deceptive. Never take advantage of anyone by lying or manipulating information, and never make false, misleading or disrespectful comments about our competitors or their products or services. Seek help from the Division General Counsel or the Compliance Officer with any questions.

WHAT IF...

I RECEIVE INFORMATION ABOUT ANOTHER COMPANY THAT I THINK MAY HAVE BEEN OBTAINED ILLEGALLY?

Don't read it or use it for your own benefit or the benefit of Cox Media Group. Turn it over to the [Compliance Officer](#) immediately.

DO:

- Be up-front and transparent in your business dealings and promote positive business relationships everywhere we operate.
- Sell our products and services on the basis of their great quality and performance.
- Avoid even the appearance of anything that could suggest something unfair or deceptive.
- Seek help from the [Division General Counsel](#) for questions about any law or regulation.

DON'T COMMUNICATE WITH OUR COMPETITORS ABOUT:

- "Fixing" prices (for example, setting minimum or maximum prices).
- "Fixing" terms (for example, agreeing on pricing formulas, credit terms, etc.).
- Dividing up markets, customers or territories.
- Preventing another company from entering the market.
- Interfering with the competitive bidding process.
- Stealing trade secrets.

WHAT IF...

AN INFORMAL CONVERSATION WITH A COMPETITOR AT AN INDUSTRY TRADE SHOW STARTS TO TURN INTO A DISCUSSION ABOUT PRICING STRATEGIES?

Make it clear that you won't participate in any discussion of competitive matters. Then, promptly leave and report the incident to the Compliance Officer.

ANTI-BRIBERY/ ANTI-CORRUPTION LAWS

We conduct business with integrity. Giving or receiving bribes and other payments to or from any supplier, customer or other third party for the purpose of obtaining a business advantage is not only unethical, but illegal. It is also illegal to offer or make a payment to a public official for the purpose of influencing an official act or decision. Never offer, make or authorize a payment or anything of value to influence a business decision, whether in the public or private sector. Acts of bribery and corruption are simply not part of the way we do business.

WE CONDUCT BUSINESS LAWFULLY

DID YOU KNOW?

“Anything of value” doesn’t just mean cash. It could be stock, a gift certificate, a favor, a loan, any kind of home improvement, a job, a kickback, a discount, an offer of entertainment or travel. Even a charitable or political contribution could be considered a bribe under certain circumstances.

INSIDER TRADING LAWS

We protect inside information. Your job may bring you into contact with material, nonpublic information or “inside” information about one of our customers, vendors, current or potential strategic partners or competitors. If so, don’t buy or sell stock or engage in any other action to take advantage of that information. Passing along inside information to friends, family or anyone outside the company is called “tipping,” and is also prohibited.

WHAT’S “MATERIAL, NONPUBLIC (OR ‘INSIDE’) INFORMATION”?

It’s information about a publicly held company (i.e., a company whose stock is traded on an exchange such as the New York Stock Exchange or NASDAQ), that hasn’t been widely disseminated to investors or the public, but might be important in making a decision to buy, sell or hold stock in that company. It could include things like budgets, sales or marketing forecasts or information about gaining or losing a major customer or supplier.



LIVE IT

SPEAK UP IF YOU SEE OR SUSPECT AN ACT OF BRIBERY OR CORRUPT BUSINESS PRACTICE.

DON’T TRADE BASED ON “INSIDE” INFORMATION.

5 WE UNDERSTAND OUR RESPONSIBILITY TO OTHERS

It's important to be a good partner. We get that. So, we do the things we need to do to honor the relationships we've built with others inside and outside of Cox Media Group.

FIND OUT

- How We Promote Safety
- About Our Commitment to Our Customers
- About Our Commitment to Our Audiences
- How We Work With Suppliers
- How We Respect Our Competitors

WE UNDERSTAND OUR RESPONSIBILITY TO OTHERS

WE MAINTAIN A SAFE AND HEALTHY WORKPLACE

We're committed to providing you (and anyone else lawfully on our property) with a **safe and healthy** workplace. Some locations or markets may have different local safety and security policies, procedures and practices, which should be reviewed in conjunction with the Code. Make sure you know and follow the rules that apply to your location or market. Contact your supervisor or HR representative if you have questions.

DO YOUR PART:

- Be proactive in promoting your own health and safety.
- Follow our policies and procedures.
- Be alert to safety risks and only undertake work you're trained to do.
- If you see something, say something.

SAFE ALSO MEANS VIOLENCE-FREE. WE DON'T TOLERATE:

- Threats of any kind
- Bullying or intimidation
- Violence

Possession of a weapon of any kind on Cox Media Group property, including parking lots (except where specifically permitted by law), on a customer's premises, while engaged in an activity for Cox Media Group, or at a Cox Media Group-sponsored event, is prohibited unless possession or use is approved by the appropriate company officer.

If your job involves operating a company vehicle or using your own vehicle to conduct company business:

- Know and follow our Driving While on Company Business Policy.
- Observe safe driving practices.
- Remember that reading or sending text messages or emails while driving is strictly prohibited.

We protect people in everything we do. If you experience or witness an accident, injury, illness or unsafe condition, report it right away to your supervisor or HR representative.

Drugs and alcohol can affect your ability to perform at your best and put you and others at risk. That's why we strictly forbid the use of illegal drugs (or abuse of legal drugs) or alcohol in the workplace or while operating company equipment unless in connection with a company-authorized event where the consumption of alcohol has been approved by the company. If you suspect drug or alcohol abuse in the workplace, Speak Up.

Our confidential Employee Assistance Program (EAP) is available to help you and your family members resolve personal, family or work-related problems.

EXPLORE OUR POLICIES

- > Workplace Violence Policy
- > Drug and Alcohol Policy
- > Driving While on Company Business Policy



WHAT IF...

THERE'S SOMETHING I CAN DO TO SAVE SOME TIME BUT IT POSES A SAFETY RISK?

Don't do it. Faster isn't better if it puts your safety or the safety of others at risk.

WE UNDERSTAND OUR RESPONSIBILITY TO OTHERS

WE HONOR THE PROMISES WE MAKE TO OUR CUSTOMERS

A good relationship is a two-way street. Help us build long-term customer relationships:

- Tell the truth in advertising, sales or marketing information.
- Inform them of any terms or conditions associated with our products or services.
- Interact honestly and with integrity. Never mislead, exaggerate or leave out information to create a false impression.
- Don't promise products, features or services that we can't deliver.
- Comply with laws that promote consumer protection and prohibit deceptive trade practices.
- Protect their personal information (see: We Respect the Privacy of Others).

WE UNDERSTAND OUR RESPONSIBILITY TO OUR AUDIENCES

Our success as a company depends on maintaining the public's trust. To keep that trust, we pursue the truth and make integrity a part of everything we do as a company.

We have a responsibility to our audiences to function as a watchdog on government and other institutions and to seek solutions to problems in our communities. Our work provides information that allows our audiences to be effective citizens and enables them to improve their lives. What we do provides a forum for discussion and allows a diverse mix of voices to be heard. We take our responsibility seriously and strive to always advance the "ultimate good."

Your commitment helps us honor the obligation we have to serve our audiences and the public interest.

WE CONDUCT BUSINESS HONESTLY AND ETHICALLY ...

... WITH OUR SUPPLIERS

We choose suppliers based on a diverse set of factors like quality, cost, culture, availability and service.

We hold our suppliers to the same high standards to which we hold ourselves and expect that anyone who conducts business on our behalf will operate ethically, in compliance with the law, and in a way that's consistent with our Code, our policies and Cox Media Group's best interests.

We expect suppliers to respect and protect our confidential business information and, in return, we respect and protect theirs.

... WITH OUR COMPETITORS

It's okay to gather information about our competitors and their customers, suppliers and vendors, but we need to do it legally and ethically. Use good judgment. Gather information from public sources and customer feedback. Don't do anything you shouldn't, and don't ask someone else to do something you're not permitted to do yourself.

Sources of Information About Competitors? Check public sources like ...

- Published articles, ads, trade press accounts
- Trade shows and customer feedback
- Information publicly available on the internet
- Industry surveys by reputable consultants

Using inappropriately obtained confidential information about our competitors from current or former employees is never okay. If you receive any competitor information that you think may be confidential and have been obtained inappropriately, contact the Compliance Officer.

EXPLORE OUR POLICIES

- > Newsroom Ethics Policy
- > Rules on Payola and Plugola (Broadcast)
- > Procurement Policy

6 WE DO THE RIGHT THING

We're loyal, and we follow the generations of loyal employees who came before us. We don't engage in activities or relationships that could make it hard for us to impartially, objectively and effectively carry out our jobs.

FIND OUT

- How We Avoid Conflicts
- About Giving and Receiving Gifts
- About Broadcasting Requirements
- About Speaking on Behalf of Cox Media Group
- About Responding to Government Requests
- About Our Social Media Policy

WE DO THE RIGHT THING

WE AVOID CONFLICTS OF INTEREST

Our lives outside of Cox Media Group are filled with activities, but when those activities interfere with the decisions you make on behalf of our company, that puts you and Cox Media Group in an awkward position and can impact your effectiveness as an employee. A conflict of interest exists when what you do (or what your family members do) outside of Cox Media Group interferes with the job you do.

While it's not possible to list every situation that could present a conflict, there are certain situations in which conflicts typically arise. You have an obligation to avoid even the appearance of a conflict.



WHAT KINDS OF SITUATIONS COULD PRESENT A CONFLICT?

- **A Second Job:** Work outside of Cox Media Group can pose a potential conflict if it competes with the work you do for us or interferes with the time and talent you bring to your job.

Doing work, serving as a consultant, or making an appearance for one of our competitors, customers or suppliers could present a conflict.

- **Personal Relationships:** Business decisions can become difficult if the person with whom you are dealing is a friend or family member.

Selecting a friend or family member from the applicant pool for a job in your department or as a Cox Media Group vendor or supplier could be a conflict.

- **Investments:** A conflict can also arise if you or a family member owns, controls or holds a financial interest in one of our suppliers, customers or competitors.

Investing in a customer that you deal with as part of your job responsibilities at Cox Media Group could be a conflict.

- **Outside Activities:** Board directorships or advisory roles with companies, universities or other organizations may pose a conflict if decisions you make for them affect decisions you make for Cox Media Group.

It could be a conflict to serve on an Advisory Board for a company that offers services similar to ours.

- **Supervisor/Employee Relationships:** Romantic relationships can present divided loyalties.

Personal relationships can (or may appear to others to) affect an employee's objective decision-making.

Avoid these kinds of situations whenever possible and disclose them if they do arise to your supervisor, your HR representative or the Compliance Officer. Your location may have additional requirements for disclosure of potential conflicts of interest. If you have questions about the right thing to do in any situation, Speak Up. Most conflicts can be avoided or addressed if promptly disclosed and properly managed.

WE DO THE RIGHT THING

IF YOU ARE NOT SURE WHETHER AN ACTIVITY OR RELATIONSHIP PRESENTS A CONFLICT, ASK YOURSELF:

- Am I competing against our company?
- Am I using my position at the company or company resources to advance my personal interests?
- Will it interfere with my duties as an employee at Cox Media Group?
- Would it place me in a position of divided loyalty?
- Will I receive a personal benefit from it?
- Will a member of my family receive a personal benefit from it?

If you answered “yes” to any of these questions, then it is likely that the activity or relationship presents a conflict of interest and it should be promptly disclosed to your supervisor, HR representative or the Compliance Officer. If you are still unsure, seek help.

WE COMPLY WITH ALL APPLICABLE BROADCASTING REQUIREMENTS

All of our broadcast operations must comply with all applicable laws and regulations,

including, in the U.S., those issued by the Federal Communications Commission (“FCC”). Some particular areas of regulation raise special areas of concern: sponsorship identification and the related issues of payola and plugola – both of which are prohibited – and indecent content. Each violation of these rules may result in substantial monetary fines and could result in non-renewal of a station’s license or other penalties.

Payola occurs when an individual receives money, or anything of value to broadcast a song, show or a statement of any sort, without it being clear that compensation has been received in exchange for the broadcast, along with the identity of the sponsor.

Plugola occurs when a station employee broadcasts something of financial interest to him/herself, without disclosing that interest. Plugola is similar to payola, except that it need not involve an outside party or payment of any kind. Sponsorship identification rules require a broadcaster to disclose on-air any arrangement under which it receives money, services or anything of value in exchange for broadcasting a song, show or any other material. The FCC has issued guidance on the definition and rules of “indecency,” which is prohibited under certain circumstances.

If you work at a broadcast location, you may be subject to these FCC regulations. If you have any questions concerning any issues related to FCC regulations or their local equivalents, consult with the Division General Counsel.

EXPLORE OUR POLICIES

- > Conflicts of Interest Policy
- > Rules on Payola and Plugola (Broadcast)
- > Political Activities and Lobbying Policy

WE UNDERSTAND THE RULES ABOUT GIFTS AND ENTERTAINMENT

Gifts and entertainment can help build good business relationships, but they can also pose a conflict of interest when they make it hard for someone to be objective about the person or the company that provides them.

Know our policies on giving and receiving gifts and entertainment. Under our policies, employees are prohibited from offering, or accepting anything of value in order to illegally influence a business decision involving Cox Media Group. Generally, accepting gifts of nominal value is permitted, but you’ll need to notify your supervisor or the Compliance Officer before receiving any gift that could affect or appear to affect your judgment to act in the best interest of Cox Media Group. Keep in mind, even if something is offered to you as “free,” it still has a value associated with it.

Seek Help if you’re not sure about what’s okay when it comes to giving and receiving gifts.

WE DO THE RIGHT THING

The rules for giving gifts, entertainment or travel to government employees or public officials are very strict, and violating them can have serious consequences for the giver, the giver’s organization and the receiver. Never offer, provide or approve anything of value to someone affiliated with the government unless you obtain written approval in advance from the Cox Public Policy Office or the Compliance Officer.

EXPLORE OUR POLICIES

- > Conflicts of Interest Policy
- > Political Activities and Lobbying Policy
- > Newsroom Ethics Policy
- > Rules on Payola and Plugola (Broadcast)

LIVE IT

KNOW AND FOLLOW THE RULES FOR GIVING AND RECEIVING GIFTS.

DON'T GIVE ANYTHING OF VALUE TO A GOVERNMENT EMPLOYEE WITHOUT ADVANCE APPROVAL.

IF YOU WORK AT A BROADCAST LOCATION, MAKE SURE THAT YOU FOLLOW FCC REQUIREMENTS AND **SEEK HELP** IF YOU ARE UNSURE.

WE ARE RESPONSIBLE WHEN COMMUNICATING ABOUT COX MEDIA GROUP

Every word we speak, write or share about Cox Media Group or its various subsidiaries or businesses has an impact on our reputation, our brand and our people. That’s why only a few people are authorized to make official statements about our company to the public. We want to make sure information that’s communicated on behalf of our company or its various subsidiaries or businesses is reliable, consistent and accurate.

Contacted by:

- The media?
- A user group?
- A member of the national consumer or trade press?
- Someone in the financial community?
- An industry/research analyst?

Unless you’re authorized to handle media relations, don’t speak on behalf of Cox Media Group if contacted by the media. By forwarding inquiries to CMG Corporate Communications, you help us avoid sending confusing messages or worse, sharing information that’s incorrect and could have possible legal implications. Please consult your supervisor if you’re ever in question about a specific situation.

WE DO THE RIGHT THING

Speaking Engagements. What if it's not about an official company position? For example, what if you're asked to sit on a panel or make a speech to an outside group or participate in a joint press release with one of Cox Media Group's vendors? You'll need to consult with your supervisor before accepting an outside offer to speak on behalf of Cox Media Group.

Requests from the Government. If you receive an inquiry from a government official or agency, contact the Division General Counsel immediately.

Social Media. Social media offers a great way to exchange ideas, drive readership, promote engagement and serve the public interest, but each of us must be smart and use it in a way that's consistent with our values and our policies.

Other rules of the (social media) road:

- Use good judgment.
- Publish accurate information.
- Do not plagiarize information.
- If you use copyrighted material, be sure to follow the rules about fair use.

If you are designated to speak on behalf of Cox Media Group or use a social media account for business purposes, do so with integrity and in compliance with our company policies. Make sure that you verify details about our company and never violate the boundaries, terms, conditions or community guidelines set by each website, social network or online community. Encourage a civil dialog about issues. Remember, you are accountable for what you post on websites, social networks and online communities. Please consult your supervisor if you have questions or need further guidance.

EXPLORE OUR POLICIES

> [Social Media Policy](#)

WHAT IF...

I HAVE BEEN CONTACTED BY A REPORTER ABOUT SOME NEW PRODUCTS WE'RE DEVELOPING. SHARING NEWS ABOUT IT WOULD HELP GENERATE EXCITEMENT. SHOULD I TELL THE REPORTER WHAT I KNOW?

No, only an official spokesperson for our company can communicate with the reporter. The information you have may be incorrect or incomplete and is best addressed by referring the reporter to [CMG Corporate Communications](#).



7 WE SAFEGUARD OUR COMPANY'S ASSETS

We're good stewards of our campus and plant as well as everything on it and in it. From intangible assets like the intellectual property we create to physical assets like the vehicles we drive and the computers we use, we take care of what's ours.

FIND OUT

- [About Protecting Physical Assets and Technology](#)
- [How We Protect Our Workplace](#)
- [How to Protect Our Information](#)
- [How We Watch Over Our Brand](#)
- [About Accuracy in Recordkeeping](#)
- [How to Maintain and Manage Our Records](#)

WE SAFEGUARD OUR COMPANY'S ASSETS

WE PROTECT OUR ASSETS

Just about everything we use to do our jobs every day would be considered company assets, and each of us is responsible for protecting them from theft, loss, waste or abuse. By protecting our assets, we're protecting our competitive advantage in the industry.

Physical and Technology Assets. We want you to have everything you need to inspire your work. We trust you to use company assets for Cox Media Group business and to take good care of them, protecting them against theft, fraud and unauthorized use.

In general, you shouldn't use Cox Media Group's assets for your personal activities. Occasional personal use of things like email, internet access, phone and fax machines is okay as long as it:

- Really is occasional.
- Doesn't interfere with your work (or anyone else's).
- Doesn't violate the law or our policies.
- Doesn't cost Cox Media Group anything.
- Isn't for personal gain or political purposes.

Be aware that anything you create, send, receive, download or store on our systems is company property, and we may review any of it at any time, where permitted by law. You shouldn't have any expectation of privacy when it comes to using our electronic systems.

You can help us protect our systems from viruses and downtime:

DO:

- Keep passwords and PINs in a secure place and don't share them with anyone.
- Ensure the physical security of information or hardware assigned to you.

DON'T:

- Install unauthorized software, applications, hardware or storage devices on your computer.
- Access our network through unauthorized applications or devices.
- Download music files.
- Install or use unlicensed software (it's illegal).
- Make copies of software, associated manuals or other materials to use at home or for someone else to use.
- Put software on a local area network (LAN) or wide area network (WAN) for use by others.

EXAMPLES OF OUR ASSETS

- **Physical assets:** Office furniture, funds, equipment and inventory
- **Technology assets:** Computer hardware, software and systems, mobile phones and tablets
- **Intangible assets:** Trademarks, domains, company social media accounts, copyrights, patents, trade secrets and other confidential business information
- **Things that make Cox Media Group ... Cox Media Group:** Our name, our brand and our customer relationships



WE SAFEGUARD OUR COMPANY'S ASSETS

WHAT IF...

I'M GOING ON VACATION. IT WOULD BE GREAT IF MY CO-WORKER RESPONDED TO ANY EMAILS THAT COME IN WHILE I'M GONE. IS IT OKAY TO LEAVE MY PASSWORD WITH HIM, AS LONG AS I RE-SET IT WHEN I GET BACK?

No, your password is, and should remain, private. Use an out-of-office message to alert people to your absence and direct them to a colleague for help while you're away.

Access to Our Workplace. We want to make sure that our workplace is secure. We trust you to do your part to protect our buildings and facilities from unauthorized access.

PROTECT OUR WORKPLACE:

- Wear your company-issued badge and make sure it is visible at all times while on company property.
- Protect your badge from loss or theft.
- Follow our policies regarding visitors.
- Don't leave secure doors open.
- Don't allow others to use your employee badge.

If you observe suspicious activity or see someone in the building without a badge, please let your supervisor or security know. Please remember each Cox Media Group business has local safety and security policies, procedures, and practices that apply to employees of that location or market and should be reviewed in conjunction with the Code.

Intangible Assets. Information is woven into every aspect of our business. Protecting it is a critical responsibility.

We own:

- Proprietary information – things that are unique to Cox Media Group like ideas, strategies, processes, business development plans (including investment, acquisition and divestiture plans) and other business ideas.
- Sensitive and/or confidential information about our company – reports, spreadsheets and financial information. Be sure you understand our four information classification categories (highly confidential, confidential, internal use only and public) and follow the rules and requirements associated with each.

Treat all confidential business information with care and take precautions before disclosing it to anyone inside or outside of our company. Disclose it only to those who have both a right and need to know the information to fulfill a legitimate, authorized business purpose or need. For companies or individuals outside of Cox Media Group, obtain a signed non-disclosure agreement (NDA) before providing access. The Division General Counsel can help you determine whether an NDA is needed, and if it is, provide you with the proper form.

Limit the amount of information shared to only what is required, and make sure the person receiving the information understands any restrictions related to its use or dissemination.

Intellectual Property. This is our knowledge base and includes things like trademarks, domains, patents, copyrights and trade secrets. Remember that copyrightable material that you generate in the course of your employment with Cox Media Group is owned by the company as “works made for hire” under the Copyright Act. You assign ownership to other intellectual property described in this paragraph by executing the Cox Media Group Intellectual Property Agreement.



WE SAFEGUARD OUR COMPANY'S ASSETS

TAKE PRECAUTIONS:

DON'T:

- Share confidential business information with friends, family, relatives or the media.
- Leave it unprotected on your desk, on white boards or in meetings.
- Leave it on unprotected or unsecured computers or devices.
- Grant access to electronic systems containing proprietary information, confidential or sensitive information or intellectual property except to those who have a need to access.
- Discuss it in public places where others could hear you.

DO:

- Shred documents that are no longer needed to keep sensitive information safe.
- Report suspicious or phishing emails or suspected system breaches.

If you come to Cox Media Group from another company, honor your obligations to protect that company's confidential information, trade secrets and intellectual property. And if you leave Cox Media Group, don't use or share our proprietary, sensitive or confidential information with your new employer or third parties.

The Cox Media Group® Name. Widely recognized and respected, our company's name, our brand and its connection to a rich heritage is one of our most valuable assets. In fact, both the Cox Media Group name and logo are federally registered trademarks. Each of us has an obligation to **protect the Cox Media Group®** name by following our brand standards, including those maintained at each location or market and by reporting any misuse, whether internally or externally.

As a company, we don't tolerate retaliation against anyone who speaks up, in good faith, about misconduct.

EXPLORE OUR POLICIES

- > Intellectual Property Agreement
- > Electronic Information Systems Policy
- > Anti-Retaliation Policy

WHAT ARE "WORKS MADE FOR HIRE"?

Any documents, compositions, media, equipment, inventions, prototypes, products, plans, concepts, discoveries and processes that you develop, by yourself or with others, while you work for Cox Media Group, or using Cox Media Group equipment, materials, supplies, facilities or intellectual property, belong to Cox Media Group as a "work made for hire" and Cox Media Group is considered the author.



WE SAFEGUARD OUR COMPANY'S ASSETS

WE MAINTAIN ACCURATE RECORDS

The records we create and maintain are important company assets, too. Accurate records are records that are understandable, complete, timely and transparent, without any errors or misstatements.

Signing Authority. Before you commit Cox Media Group or its funds, make sure you are authorized to sign the document.

Accounting and Financial Reports. The accounting and financial reports we file or disclose must comply with applicable regulations and professional standards. If you're responsible for preparing these reports, make sure the information you provide is fair, accurate, timely, understandable and transparent. Additionally, ensure that the report is supported by the appropriate documentation.

If you suspect someone of misrepresenting or falsifying information or engaging in a questionable accounting or auditing activity, Speak Up. As a company, we don't tolerate retaliation against anyone who speaks up, in good faith.

Timekeeping. If you are classified as a non-exempt employee (whether paid on an hourly or salaried basis), you are required to record your hours worked completely and accurately. Similarly, you are required to accurately record any time off in accordance with company policy and/or the policy or practice of your department or location.

Speak Up if, at any time, someone tells you to under- or over-report your hours (or someone else's hours) or asks you to conceal the dishonest timekeeping of others. Also, if you become aware of intentionally inaccurate or untruthful recording of time by others, report it. Remember, as a company, we don't tolerate retaliation against anyone who speaks up in good faith.

Records Management. Follow any recordkeeping requirements associated with your job and support transactions with the documentation necessary to provide a complete, accurate and auditable record. Know and follow our Records and Information Management Policy. It helps us **maintain the records we need** to meet our legal, tax and regulatory requirements and provides guidance on when to securely dispose of records that are no longer needed. Take care never to dispose of information that may be relevant to current or threatened litigation or if you have received a legal hold notice.



EXPLORE OUR POLICIES

- > Travel and Expense Policy
- > Records and Information Management Policy
- > Pay Practices Policy
- > P-Card Policy
- > Procurement Policy

WHAT IF...

I DON'T WORK IN FINANCE OR ACCOUNTING?

You still have a responsibility to maintain the integrity of our recordkeeping. From time-and-expense reports and benefits records to test data, work orders and sales invoices, everyday transactions must be accurate, complete and properly recorded. The successful operation of our business depends on it.

8 WE ARE GOOD NEIGHBORS

We put our values into action in communities from coast to coast. Being there, being accessible, supporting initiatives that benefit youth, education, diversity and the environment, that defines who we are as a company.

FIND OUT

- How We Partner With Our Communities
- About Charitable Activities
- About Our Policy on Political Activity and Lobbying
- How We Honor Our Environmental Responsibility

WE ARE GOOD NEIGHBORS

WE GIVE BACK

As a company, we're committed to giving back to the communities we serve. We lend our time, talent, energy and money to support not only those around the corner, but around the globe (visit Committed to Our Communities or InSite for additional information).

We encourage your personal involvement in the communities where you live and work, but when you contribute your own time or money to a charitable organization you care about, take care to make sure your activities are lawful and consistent with our policies. You shouldn't use or donate Cox Media Group funds or assets for any activity outside of Cox Media Group unless you receive approval in advance.

Charitable Contributions. We make contributions that:

- Provide goodwill to organizations and causes in need.
- Strengthen the social, economic and educational infrastructure of our community.

All donations, whether monetary, in-kind, media or otherwise, must be consistent with our goals and approved in advance.

Political Activities. We respect your right to engage in personal political activities, but again, you must do so on your own time, with your own resources. Don't use Cox Media Group time, equipment or property (including envelopes, email, letterhead or postage) for personal political activities.

We are prohibited from making contributions as a company to any federal candidates and will not reimburse any employee for making a campaign contribution to a federal, state or local candidate or other campaign committee, even if state and local laws permit it.

Lobbying. If your work involves contacts with legislators, regulators, executive branch officials (or their staffs), government contacts, efforts to influence legislative or administrative actions, or support of these activities, make sure you follow all applicable disclosure rules. Discuss these activities with the Compliance Officer or Cox Public Policy Office to determine if disclosure and other rules apply.

CoxPAC and Trade or Industry PACs. Our Cox employee political action committee and various Trade or Industry political action committees (PACs) accept voluntary contributions from eligible employees to support political candidates and committees that share Cox's interests. We comply with all applicable laws and regulations governing solicitations for contributions and disbursement of funds. Participation in any CoxPAC or Trade or Industry PACs (federal or state) is voluntary and no employee will be required to participate.

For more information, see The Congressional Ethics Rules and Political Participation Guidelines.



WHAT IF...
A FRIEND IS RUNNING FOR U.S. CONGRESS. CAN I HELP HER OUT WITH HER CAMPAIGN?

Perhaps. Your personal support is your personal business. Just make sure you don't use Cox Media Group assets to advance the campaign.

WE ARE GOOD NEIGHBORS

WE ARE GOOD STEWARDS

At Cox, we create positive environmental change by operating in ways that reduce our impact and inspire our employees, customers, suppliers and partners.

In 2007, we launched Cox Conserves, our commitment to environmental sustainability. Cox Conserves focuses on reducing waste and energy consumption, as well as conserving water.

Cox Conserves goals:

- Send zero waste to landfill in the next 7-10 years.
- Become carbon and water neutral in the next 25-30 years.

We value our place in the global community and are committed to conducting business in an ethical, socially responsible and environmentally sustainable manner.

We follow applicable laws, policies, permits and regulations as they relate to protecting the environment and conserving energy and natural resources, and we work to reduce the environmental impact of our operations everywhere we do business. Your commitment helps our company to be good stewards, to reach our goals and to make positive environmental change.

EXPLORE OUR POLICIES

- > Political Activities and Lobbying Policy
- > The Congressional Ethics Rules and Political Participation Guidelines

WE PROTECT HUMAN RIGHTS

We operate with integrity and are committed to conducting business in a way that respects human rights and the dignity of people. We prohibit the employment of underage children or forced labor, as well as any form of physical punishment or abuse. We expect suppliers throughout our global supply chain to share our commitment to the same high standards.

Do your part to respect the human rights of people in communities that are impacted by our activities, and report any human rights abuse that you see or suspect either in our operations or in those of our business partners.



LIVE IT

REDUCE AND RECYCLE WHEREVER POSSIBLE AND REPORT ANY DANGEROUS OR HAZARDOUS ENVIRONMENTAL CONDITIONS. WE'RE GOOD CITIZENS.

**CLOSING THOUGHTS:
A MESSAGE FROM OUR COMPLIANCE OFFICER**

Dear fellow Cox employee,

I am proud of our legacy. All of us have worked hard to make our company successful and build an unparalleled reputation in the communities we serve.

We each play a critical role in protecting our reputation. My responsibility as CMG’s Compliance Officer is to work with you to preserve our legacy. I am here to help you understand the laws and regulations that specifically apply to our industry. My responsibilities also include assisting you in understanding the high ethical standards to which we are all held.

Our Code of Conduct: *Doing Business Right* is a valuable resource that provides information and guidance to help you make sound decisions in your day-to-day activities. We all have an obligation to understand our Code and to seek help if we have questions or suspect activity that violates our Code.

If you have questions or concerns to report, you may contact your supervisor, your HR representative, or the Ethics Team. You may also voice your concerns anonymously by calling our confidential Ethics Hotline or via the web at CoxEthicsHotline.EthicsPoint.com. I am also always available to answer any questions about our Code of Conduct or assist you with any concerns you have.

Sincerely,

**AMBER N. HALL, CCEP
COMPLIANCE OFFICER
COX MEDIA GROUP**



GLOSSARY

Antitrust – Antitrust laws are a combination of state and federal statutes, regulations and court decisions intended to protect free enterprise and encourage fair competition. They deal with agreements and practices that restrain free trade (for example, price fixing and boycotting). These laws also prohibit anti-competitive practices: pricing intended to drive a competitor out of business; harassment, misrepresentation or disparagement of a competitor or its products; theft of trade secrets; kickbacks and bribery.

Assets – Anything owned by a company including physical property, technology, financial and information assets.

Bribery – Giving, offering to give, promising to give or authorizing to give anything of value to someone outside of Cox Media Group, for an improper purpose or to influence a business decision.

Confidential – Any business information that is not Highly Confidential and which is considered critical to Cox Media Group’s ongoing operations and could seriously impede or disrupt them if disclosed without authorization or made available to the public. This can include any information that is not Highly Confidential that contains personally identifiable information, audit reports, accounting information, business plans, etc.

Conflict of interest – Any situation, or appearance of a situation, where personal interests interfere with Cox Media Group’s interests, or where we take for ourselves a benefit, opportunity or advantage that rightfully belongs to the company.

Discrimination – Treating an applicant or an employee less favorably because of his or her race, color, religion, gender, sexual orientation, gender identity, national origin, age, disability or other characteristic protected by law.

Ethics – A set of principles, beliefs and rules of behavior that define a culture and the way things are done. When we say an “ethical culture,” we mean the kind of workplace where honesty, fairness and respect are valued.

Gifts – Anything of value for which the recipient does not pay market value. Gifts may include discounts, loans, cash, gift certificates or gift cards, favorable terms on any product or service, services, prices, use of another company’s vehicle or vacation facilities, stocks or other securities, home improvements, meals, entertainment or participation in events, transportation, lodging, discounts and promotional items.

Good faith – Honestly believing in what you’re doing. Sharing a concern “in good faith” means that you honestly believe that there’s a violation of law or our company policies and that you’re not deliberately making a false report.

Harassment – Unwelcome behavior that’s based on race, color, religion, gender, national origin, age, disability or other characteristic protected by law.

Highly confidential – Any business information for which the loss of confidentiality, integrity or availability could be expected to have an adverse effect on Cox Media Group, could provide access to business secrets and could jeopardize important interests or actions of Cox Media Group, could cause an individual harm if the information were to be misused and would require public disclosure or notification to the affected individuals. The highest levels of confidentiality and integrity are vital. This can include information such as social security or tax identification numbers, driver’s license or state-issued identification numbers, financial or payment card information, personal health information, passwords, access codes, customer PINs, security keys, etc.

GLOSSARY continued

Insider trading – Using material, nonpublic (i.e., “inside”) information, or tipping someone else to use it, to buy or sell stock in a company.

Integrity – Honesty; an uncompromising adherence to high ethical standards.

Internal information – Any information that is not Highly Confidential or Confidential and that is not approved for general circulation outside Cox Media Group, where its unauthorized disclosure would inconvenience Cox Media Group, but is unlikely to result in significant financial loss or serious damage. This can include any information such as internal memos, policies and standards, internal project reports, minutes of meetings, unreleased press releases, unpublished marketing materials, competitive analysis, internal non-proprietary policies, processes or procedures.

Legally protected categories – Characteristics such as race, color, religion, gender, sexual orientation, gender identity or expression, age, national origin, citizenship status, marital status, disability, genetic information, status as a protected veteran by federal law, or any other characteristic protected by the law.

Material, nonpublic (or “inside”) information – Information about a publicly held company that hasn’t been widely disseminated to investors or to the public, but might be important in making a decision to buy, sell or hold stock in that company. It could include things like budgets, sales or marketing forecasts or information about gaining or losing a major customer or supplier.

Personal information – Anything that can be used to identify a specific person, like a name, home address, email address, phone number, credit card number or birth date.

PIN – Personal Identification Number

Retaliation – An adverse action taken because an individual has reported a workplace concern or engaged in a protected concerted activity. Adverse actions include but are not limited to: dismissal from employment, demotion, loss of salary or benefits, involuntary transfer or reassignment, or denial of promotion that otherwise would have been received. Also prohibited are threats of retaliation or other discrimination directly related to the report made by the employee.

Social media – Forms of electronic communication through which a community of users create and share information, ideas and other content.

Speaking engagement – Includes speaking at industry events, professional associations, conference and other business gatherings or functions where you are speaking as a representative of Cox Media Group.

Theft – Taking something for yourself (e.g., money, equipment, technology, materials, supplies, etc.) that belongs to someone else.

INDEX

Items listed on this page function like links in a web browser. Click on an item to visit that page.

[Antitrust and Competition 20](#)

[Anti-Bribery and Anti-Corruption 20](#)

[Assets, Protecting 31](#)

[Charitable Contributions 36](#)

[Communicating About Cox Media Group 28](#)

[Competitors, Gathering Information 24](#)

[Conflicts of Interest 26](#)

[Cox Media Group Brand 36](#)

[Discrimination 16](#)

[Diversity 16](#)

[Drugs and Alcohol 23](#)

[Employee Assistance Program 23](#)

[Environment, Protecting the 37](#)

[Equal Employment Opportunity 16](#)

[Ethics Hotline 13](#)

[Gifts and Entertainment 27](#)

[Government, Inquiries From 29](#)

[Harassment 17](#)

[Human Rights 37](#)

[Insider Trading 21](#)

[Lobbying 36](#)

[Open Door 13](#)

[Political Activities 36](#)

[Privacy 19](#)

[Records, Accuracy 34](#)

[Records Management 34](#)

[Reporting Violations 13](#)

[Responsibilities of Employees 12](#)

[Responsibilities of Managers 14](#)

[Retaliation 14](#)

[Safety 23](#)

[Sexual Harassment 17](#)

[Suppliers, Working With 24](#)

[Workplace Violence 23](#)

CONTACTS

Need help? Start by talking to your supervisor or your local HR representative. There are others who can help, too.

Contact:	For help with:	Contact information:
Ethics Team	Any issue, question or concern.	CMGEthics@coxinc.com