



Doing Well by Doing Good

Code of Conduct

enter >>



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A Message From Our President and CEO

Our work, when we do it well, has great power – to inform, entertain and do good in our world. As a mission-driven journalism company, we know our work comes with great responsibility. We tell the truth and hold the powerful accountable. But in all that we say and do, we also must hold ourselves accountable.

Decades of hard work and integrity have gone into building our company. We owe it to those who came before us and those who rely on us today to carry on the Scripps tradition of integrity. Our Code of Conduct shows us how. It's here to help you understand what Scripps is all about – what we believe and what we expect of our employees.

The Code is a resource you should look to often – for advice on making decisions and handling ethical situations in a way that reflects both our values and the best of Scripps. And because it's just as important to speak up for what's right, the Code also points you to helpful resources to ask questions or share concerns.

Never forget the impact your work and your actions have on Scripps and those we serve. Your commitment to **Doing Well by Doing Good** makes all the difference. With every good choice and ethical interaction, you're letting our light shine brighter as we create an engaged and better-informed world.



Adam Symson

President and Chief Executive Officer



Our Commitment

Our Mission

We do well by doing good – creating value for customers, employees and owners by informing, engaging and empowering those we serve.

Our Vision

To create a better-informed world.

Our Motto

Give light and the people will find their own way.



Our Values

Courage

- We act honestly and transparently.
- We hold ourselves to the highest ethical standards as a company and individual employees.
- We are accountable to ourselves and each other.
- We are committed to making business decisions that emphasize strong performance and shareholder value.

Curiosity

- We aren't afraid to ask questions, speak up and dig deeper.
- We continuously seek improvement and creative ways to evolve.
- We challenge the status quo by embracing entrepreneurship and driving change.
- We take pride in our work and pursue excellence in all that we do.

Compassion

- We act with concern for the well-being of our colleagues and those whose lives we touch.
- We treat others with respect and seek to understand a variety of viewpoints and perspectives.
- We celebrate each person's value, individuality and what we accomplish when we collaborate.
- We are equitable and impartial in how we conduct our business and journalism.

Community

- We inform, engage and empower those we serve.
- We are dedicated to providing an equal opportunity for all.
- We strive always to be aware of the effect that our decisions and actions may have on others.
- We foster an inclusive environment where people can be their authentic selves and feel they belong.



Committed to Our Code

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At Scripps, our values guide us each day. They inspire our actions. We bring them to life by following our Code – our daily guide for working with integrity.

Getting to Know the Code

Scripps is a company with a rich history and a wide reach, informing and entertaining a growing network of households and communities. No matter how far we go as an organization, we'll never lose sight of our mission or our commitment to what matters most: the way we work, the way we succeed and the way we treat others.

We recognize that doing what's right is a choice every individual must make. Every day, each of us makes decisions that impact Scripps – most of them small, but others large and complicated. While we always do our best to choose what's right, the right choice isn't always the obvious one – or the easiest one. That's where the Code of Conduct ("Code") can help.

Why do we have a Code?

The Code can help you navigate common ethical situations, choose what's right or find someone at Scripps who can help. Reading the Code also empowers you to identify activity that might violate it – or our policies or the laws that apply to us. We don't expect you to become a legal expert – that's not what the Code is for. Think of it, and the policies to which it links, as a road map, pointing you in the right direction to do well and do good.

What you'll find in the Code

- Overviews of important ethical topics
- Answers to common questions
- Links to our policies and other resources
- Decision-making tools
- Definitions of key terms
- Resources to contact for more information



Getting to Know the Code

Who must follow the Code?

Every employee at every level and in every Scripps location must know and follow the Code, regardless of the job you hold, including our Board of Directors, executives, and all full- and part-time employees of The E.W. Scripps Company and its subsidiaries and affiliates.

What about our business partners?

Our suppliers, vendors, consultants and contractors do work in our name, so we expect them to uphold the spirit of the Code and share our commitment to the highest ethical standards.

What if there's a violation?

Our Code represents so much more to Scripps than a set of rules. It sets out the standards of behavior that we all share, and we don't tolerate anyone breaking them. If a violation of our Code or policies does occur, we take it seriously. Violations can lead to disciplinary action – even up to and including the ending of your employment. And if a law has been broken, it can lead to further civil or criminal penalties for anyone involved and for Scripps.

What you won't find

You won't find advice on every possible situation.

But the Code is always the best starting point. If the Code can't help, talk to your manager or reach out to another resource listed in the Code.



Understanding Your Role and Responsibilities

Reputations are built over time but can be destroyed by a single unethical act. To preserve our reputation for the next generation, it's up to each of us to understand our responsibilities to Scripps and fulfill them without fail.



Responsibilities we all share:



- **Live by the Code** – Let the Code and our values inspire your every action.
- **Follow the law and our policies** – Many laws and rules apply to your work, including our [policies](#).
- **Timely complete compliance training courses** – Learn about our policies and the laws that apply to your work by taking required training in a timely manner and [ask for help](#) if something isn't clear.
- **Speak up for what's right** – If you see or suspect anything that could violate our Code, policies or the law, [share your concerns](#) immediately and help with any investigations that may follow.

Additional responsibilities for managers:



- **Build an ethical culture** – Set a good example for your team by following the Code and showing them what **Doing Well by Doing Good** looks like at Scripps. Stress the importance of compliance and ensure your team completes compliance training in a timely manner.
- **Open up communication** – Give your team confidence to share concerns by being willing to listen – without judgment or threat of retaliation – when they have questions or concerns.
- **Take action** – As soon as you learn about possible misconduct, don't wait, and don't investigate it yourself. Share your concerns to prevent further harm.

Following Our Policies and the Law

For Scripps, compliance with the law is not optional. A variety of laws and regulations apply to our work, and we're committed to upholding them wherever we operate – even if we're doing business in other countries. We know the importance of following the letter and spirit of the law and our company's policies and taking required training so we can properly uphold them. That's how we keep our promises and do what's right for our audiences and each other.

While we always want to do what's best for Scripps, we must never use our company's needs or our own to justify violating the Code, our policies or the law. And no one at Scripps has the right to ask you to do so – no matter what position they hold. If you believe you're being pressured to do something inappropriate, [share your concerns](#) immediately.

If local laws or requirements seem to conflict with our Code or policies, contact the [Legal department](#). They can answer your questions and help you comply.

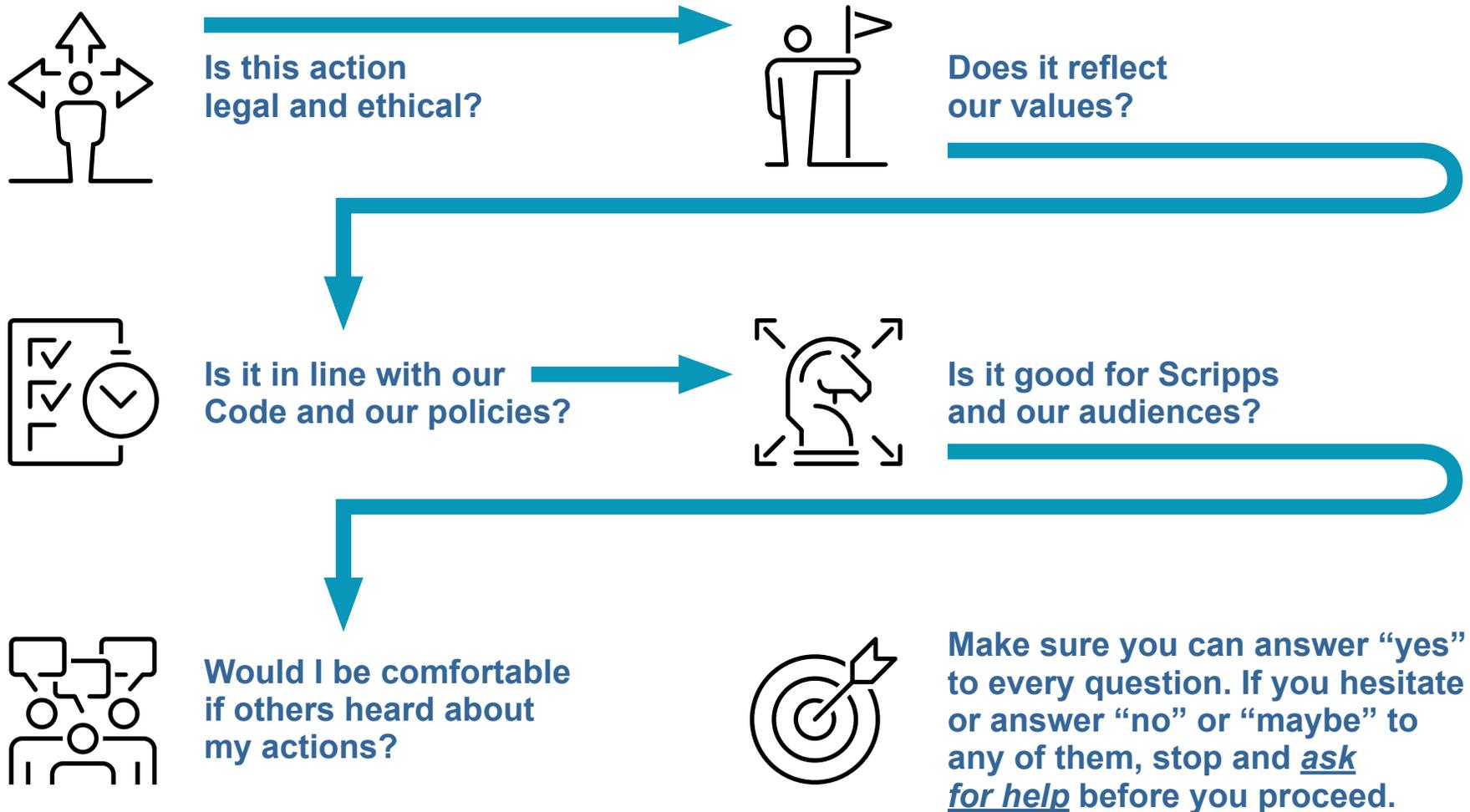
What is the “letter and spirit of the law”?

The “letter” of the law is its specific wording. The “spirit” goes deeper, referring to its true intention. The “spirit” is violated when someone finds a way to get around a law without violating the specifics. That's not how we operate at Scripps. We show courage through complete compliance.



Making Good Decisions

How can you be sure that the choices you make each day are the right ones? Check the Code first, but if you're still not sure about a certain decision, try asking yourself these questions:



Sharing Concerns

Recognizing possible misconduct is only the first step in doing what's right. Speaking up is even more important – and often more difficult. We understand the courage it takes to speak up for our principles, but it's our responsibility as employees of Scripps. When you suspect that our Code, policies or the law has been broken, we rely on you to share your concerns.



How do I speak up?

Ignoring possible misconduct is not an option. To make sure you share concerns, and you feel

confident and comfortable doing so, we offer these options for speaking up:

- Your manager or any member of management
- Your local, division or corporate Human Resources department
- The [Chief Ethics Officer](#) at **513-977-3891** or ethics@scripps.com
- The [Legal department](#)

Or, if you prefer, you also may contact:
The Scripps-operated Ethics Line
at 513-977-3886

Or

EthicsPoint

This service is operated by an independent third-party provider and is available toll-free, 24 hours a day, seven days a week. Although giving your name helps us conduct a more thorough investigation, you will have the option to remain anonymous when contacting EthicsPoint, where permitted by local law. You can reach this service:

Online: www.ethicspoint.com

By phone: 888-397-4911



Sharing Concerns

After sharing a concern ...

- Scripps will take your report seriously and, where appropriate, we will conduct a prompt and thorough investigation.
- While investigating, we protect the rights of everyone involved (both the person reporting and those suspected of misconduct).
- As an employee, you're expected to cooperate fully and honestly in any internal or external investigation.
- If an investigation shows that a violation of the Code or a company policy or other inappropriate conduct has occurred, we will take appropriate disciplinary action.

Could I face retaliation?

Retaliation goes against everything we believe as a company. In fact, it's a serious violation of our Code, and it's illegal. At Scripps, we believe in open communication and supporting anyone who has a concern. That's why we do not tolerate retaliation against anyone who shares a concern in good faith, assists in an investigation or refuses to do something that violates our Code or policies.

Retaliation can take a variety of forms but often looks like:

- Demotion
- Reduced pay
- Exclusion
- Dismissal



Sharing Concerns

Have I reported “in good faith”?

You have if you truly believe your concern to be true, and you haven't made a report maliciously or knowing that it's false.

Remember, you don't have to verify that misconduct has happened. Even if your report turns out not to be true or not to be a violation of policy or the law, we won't tolerate retaliation against you.

Consider This

I have a concern that I'd like to report, but it involves a member of management at Scripps. I'm afraid I could lose my job if I speak up. Should I just wait for someone else to make a report so I won't have to?

Absolutely not. You shouldn't wait to share your concern. We understand it can be difficult to report something involving a member of management, or even a friend for that matter. But remember that if you're aware of possible misconduct, it's your responsibility to report it, no matter who is involved. Any retaliation against you will not be permitted.

Learn More

- [Ethics/Legal Complaints](#)
- [Whistleblower Procedures](#)
- [Employee Handbook](#)
- [Anti-harassment Policy](#)





Committed to Courage

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We do our work fearlessly, holding fast to our beliefs and values. By choosing what's right and speaking up for what's right, we know we can achieve anything.

Keeping Accurate Records

Accuracy is at the heart of our business at Scripps. When the records we keep are accurate and complete, we're better able to communicate, fulfill our obligations and make good decisions.

DOING GOOD MEANS ...
COURAGE

Following accounting standards: Our shareholders rely on our financial records to accurately reflect our business at all times. If your job involves our finance or accounting functions, ensure fairness and transparency in all our financial and operational reporting. Follow all laws and accounting policies. Be honest and accurate in every record and disclosure. Never make a false, misleading or incomplete entry, which could lead to legal liability for those involved.

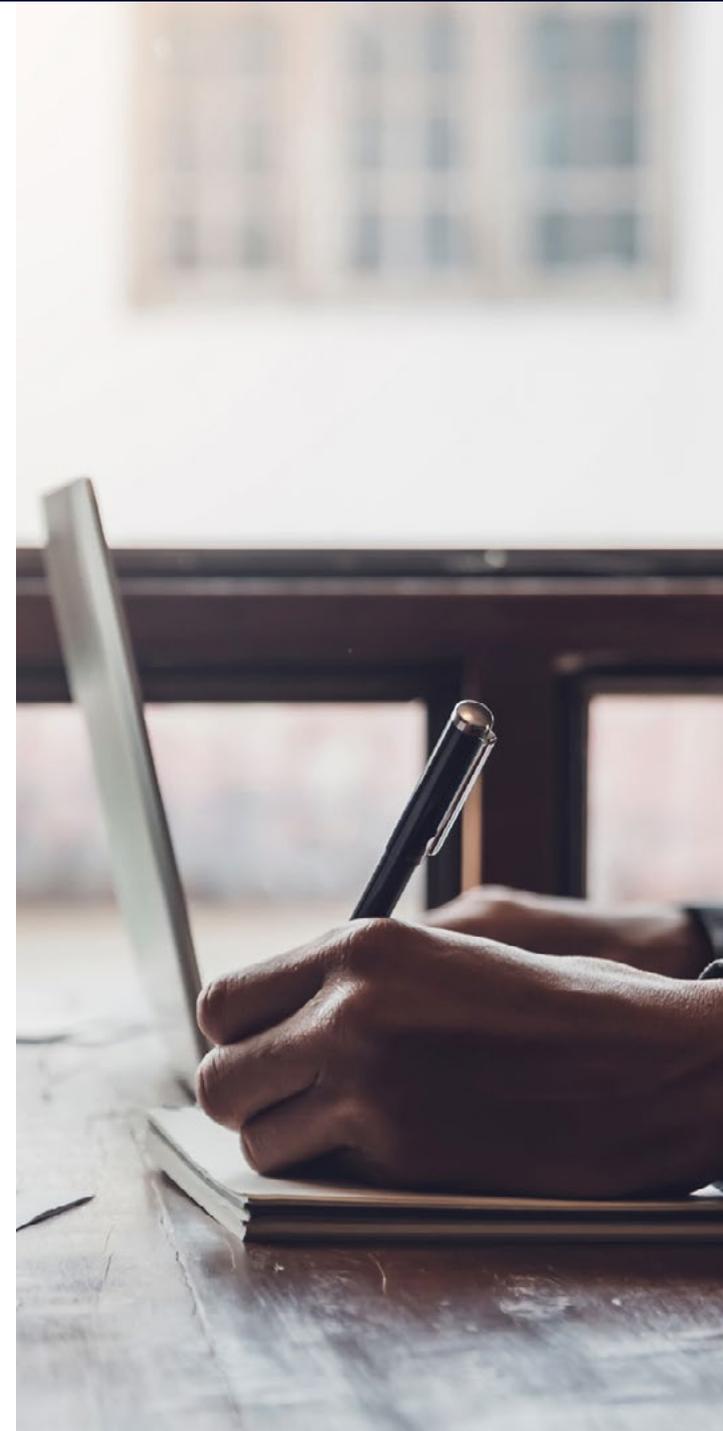
Ensuring accuracy and transparency: Scripps insists that every activity we perform is supported by reliable records. And because every Scripps employee contributes to our records in some way, whether it's a time record, transaction or agreement, it's our responsibility to keep them up to date and accurate and provide supporting documentation when needed. [Share your concerns](#) about any suspicious activity involving our records.



Spotlight on Courage

What else can I do?

- Cooperate with internal and external audits or investigations.
- Maintain supporting documentation and provide it when required.
- Don't give in to pressure to alter or falsify a record.



Keeping Accurate Records

Managing our records: When we handle our records responsibly, we ensure that they are retrievable, authentic and accurate. When it comes to retaining, securing, storing and disposing of records, follow our policies carefully. If you receive notice of a legal hold on any document or learn about an imminent lawsuit, don't destroy any information related to that proceeding. Contact the [Legal department](#) with any questions.

What are our business records?

They include:

- Expense reports
- Invoices
- Timesheets
- Performance reviews
- Contracts
- Bids and proposals
- Emails and other correspondence

Consider This

My manager has asked me to delay sending an invoice to Accounts Payable until next quarter. Since it seems like my manager is only trying to give our department some leeway to meet our budget, should I follow the request?

No, you shouldn't. The costs of goods and services must be accounted for in the period incurred. Your manager is actually asking you to create an inaccurate record. You should report the situation immediately.

Learn More

[Document Retention Policy](#)

[Regulation Fair Disclosure Policy](#)



Avoiding Conflicts of Interest

The relationship between Scripps and our employees, audience, vendors and communities is built on mutual trust. We never violate that trust by doing something that undermines our mission or influences our decision-making.

DOING GOOD MEANS ...

COURAGE

Understanding conflicts: A conflict of interest is a situation where an employee's personal interests go against their company's best interests. Conflicts can influence your judgment and put your company at a disadvantage. At Scripps, we avoid letting personal interests or family situations conflict with our company's interests. Importantly, even the appearance of a conflict can damage Scripps and our reputation, so watch for them and steer clear of them.

A conflict of interest might look like:

- Taking a second job with one of our competitors
- Supervising an immediate family member or friend
- Making a significant investment in a vendor or other business partner
- Taking a business opportunity that belongs to Scripps
- Awarding business as a vendor to a family member or friend
- Supporting or donating to a political candidate
- Doing paid work for a customer or vendor, such as freelance reporting or writing on your time off
- Serving on the board of directors for a company that competes with ours
- Soliciting or accepting improper offers like a gift, an expensive meal or event tickets – see [Exchanging Appropriate Gifts](#) to learn more.

Is this a conflict?

Ask yourself if the situation could ...

- Influence your business decisions?
- Interfere with your ability to do your job?
- Negatively impact Scripps or those we serve?
- Look like a conflict to somebody else?

Did you answer “yes” or “maybe” to any of these questions? You may be facing a conflict. Talk to your manager and disclose it right away.

Avoiding Conflicts of Interest

Disclosing conflicts: If you find yourself in a possible conflict of interest situation (or fear that others may perceive that you have one), don't wait. Disclose the situation immediately by talking to your manager, another manager in the company, your Human Resources business partner or the Chief Ethics Officer. We can help you avoid or mitigate most conflicts if you let us know about them.

Consider This

I'm a reporter doing a story on upcoming plans for a controversial new apartment development in our community. A local real estate developer has agreed to have lunch with me to discuss it. Who should pay for lunch?

You should both pay your own way. If the developer pays, it could give the appearance that your reporting is being influenced by the meal. It could not only be a conflict of interest – it could also violate the Scripps Gifts and Entertainment policy.

Learn More

[Gifts and Entertainment Policy](#)

[Employee Handbook](#)

[Journalism Ethics Guidelines](#)



Protecting Confidential Information

Scripps handles and generates a great deal of information that's essential to our business, our relationships and our ability to compete. Securing that information is our legal and ethical responsibility.

DOING GOOD MEANS ... COURAGE

Handling confidential information: Your work at Scripps might put you in contact with information about our company, customers or business partners that is sensitive and not meant for public access. If it's exposed, that information could be harmful to everyone involved, so keep it confidential. See [Using Company Assets](#) and [Keeping Personal Information Private](#).

Handling intellectual property: The ideas and information we create as a company (our intellectual property) is what makes Scripps unique. We're committed to protecting this valuable asset, whether it belongs to us or to a third party. To secure intellectual property, follow our policies as well as applicable licenses and state intellectual property laws. Obtain permission before using intellectual property created by those outside the company and be aware that Scripps owns (and may monitor or access) any information stored on company devices. If you have questions about what to protect and how, contact the [Legal department](#).

Honoring anonymous sources: As newsgatherers, we sometimes receive information from sources who don't want their identity revealed. Because this is a binding promise, follow our policies carefully and only use these sources as a last resort after consulting with a news manager – when the information is vital to the story and the source is reliable.



Spotlight on Courage

How can I help?

- Never share confidential information or intellectual property with anyone who isn't authorized.
- Never discuss it publicly or share it on social media.
- Use copyrighted material or trademarks properly and legally.
- Only share confidential information with a third party when there is a signed Confidentiality or Nondisclosure Agreement or when we have a legal obligation to do so.



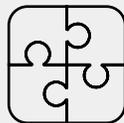
Protecting Confidential Information

What should I protect?



Confidential information, including:

- Plans for acquisitions or investments
- Plans for stories or research
- Projected sales or earnings
- Employee lists
- Customer lists
- Special terms, discounts or fees offered to customers



Intellectual property, including:

- Trademarks, copyrights and patents
- Trade secrets, inventions or designs
- Marketing or strategic plans
- Branding and logos
- Published news reports
- Videos or photographs
- Third-party assets like software, music, videos and text-based content

Consider This

I'll be retiring from Scripps soon and have access to lots of confidential information. Do I still have to protect it?

Yes, you do. Your obligation to protect confidential information and intellectual property continues even after you leave. You should also return any copy of that information or devices that contain it.

Learn More

[Copyright Guidelines](#)

[Anonymous Source Guidelines](#)

[Document Retention Policy](#)



Using Company Assets

Our company's assets are critical to our success – they help us do our jobs and better serve our customers. Protecting them means protecting our business, so we use them responsibly and securely.

DOING GOOD MEANS ...

COURAGE

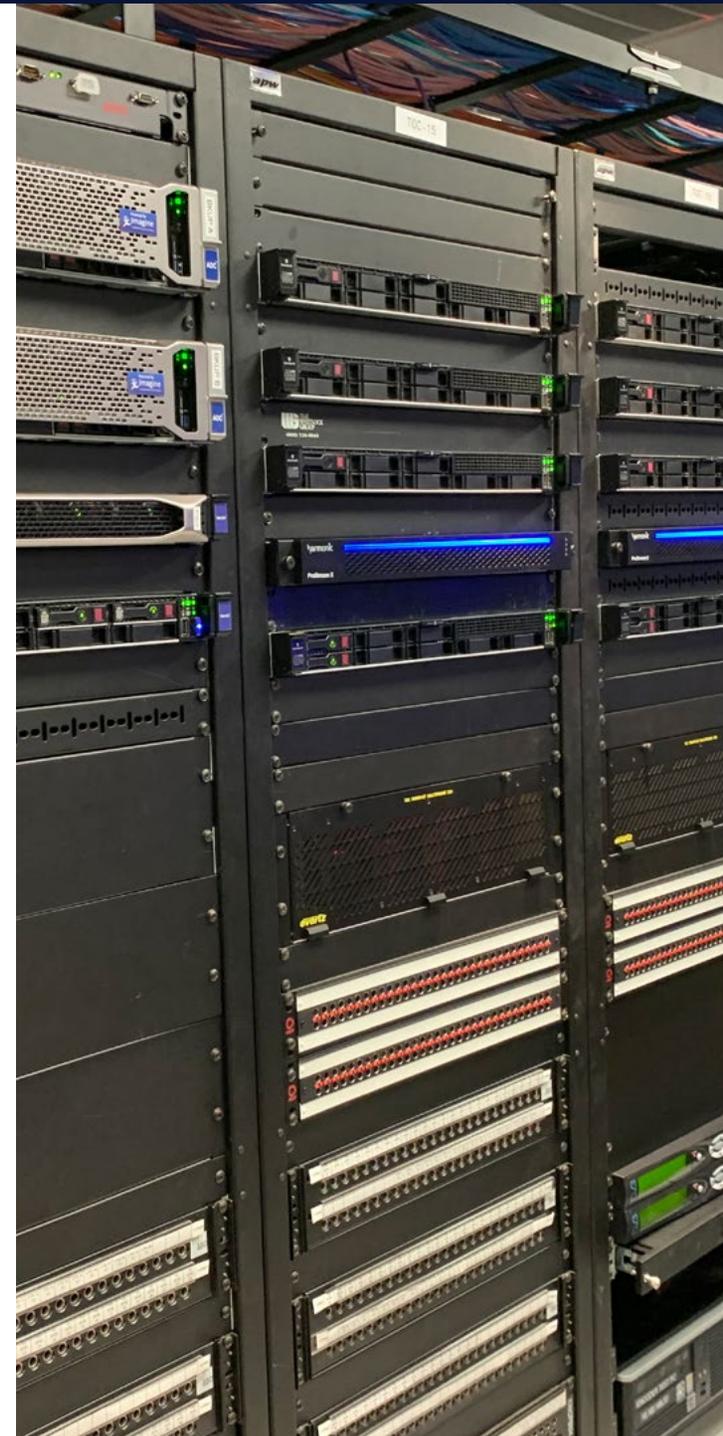
Protecting our physical assets: Every day, we use company resources to do our jobs – no matter where we work. Scripps entrusts us with these assets and expects us to protect them from loss, damage and misuse. While we permit limited personal use of our assets, always use them responsibly and in line with our policies. Never borrow, lend, sell or dispose of our assets without authorization. Be equally responsible with company funds, never spending them excessively or using them illegally or unethically.

Securing our electronic assets: We rely on our computer systems and technologies (and the data stored on them) to remain leaders in our industry, so it's critical that they stay safe and secure.

Use good judgment and follow our policies to make sure you're using them responsibly. Never use these assets for any illegal or unethical purpose.

Practicing good cybersecurity: Our data is continually at risk from cyberattacks, like phishing, malware and ransomware. Stay alert and adopt good cybersecurity habits to keep our data and systems secure:

- Use strong passwords, update them often and never share them.
- Avoid suspicious links or downloads.
- Only use approved hardware, software and applications.
- Don't use unsecured networks, like a public Wi-Fi.
- Use #Secure, when sending emails containing confidential information and/or intellectual property to external recipients.
- Never send or download confidential information, copyrighted materials or trade secrets unless you are authorized. See [Protecting Confidential Information](#) to learn more.
- Contact the appropriate resource, such as IT, if you see suspicious activity or suspect a breach.



Using Company Assets

What are our assets?



Physical assets

The resources we can see and touch, such as:

- Facilities and furniture
- Equipment and materials
- Company vehicles
- Office supplies
- Company funds



Electronic assets

The technology assets supporting our systems, including:

- Computer hardware, software and applications
- Internet access
- Networks
- Databases
- Mobile devices

Consider This

I sent an email to a family member from my Scripps computer and email address. Since I sent it to their personal email address, it's personal and private, right?

Actually, any information sent or stored on company systems belongs to Scripps. Your personal privacy is not protected, and we may inspect or disclose that information at any time. If you want to keep a personal email private, send it on your own device and use your own email address.

Learn More

[Credit Card Policy](#)

[Travel Policy](#)

[Asset Management Policy](#)



Stopping Bribery and Corruption

Our business is built on a foundation of trust. We won't allow anything to weaken that foundation, including acts of bribery or corruption, which can jeopardize our judgment and our reputation.

DOING GOOD MEANS ...
COURAGE

Watching for bribes: A bribe can seem like an easy way to score a quick win, but bribery isn't how we succeed. Even if you're told bribes are customary, remember, we don't offer them, and we don't accept them – nor anything that could even look like a bribe. We expect the same of anyone representing Scripps.



Is it a bribe?



It can be if ...

It's something of value offered to influence someone's business decision, gain an improper advantage or win or retain business.

Bribes can also be:

"Kickbacks," or payments made to someone for helping to facilitate a transaction

"Facilitation payments," or payments made to speed up routine government processes



It might look like ...

- Cash or a cash equivalent
- Lavish gifts or entertainment
- Stock options
- Loans
- Services
- Job offers
- Special discounts not available to the public
- Charitable or political contributions
- Payment of travel expenses

Stopping Bribery and Corruption

Following the rules: Companies that engage in bribery can face serious legal penalties. To make sure you're complying with anti-bribery laws, carefully follow our policies, especially those related to interactions with government officials and our rules for [exchanging appropriate gifts](#). If you have questions about specific situations or payment requests, contact the [Legal department](#) before you act.

Practicing transparency: In every transaction, whether it's with a customer or business partner, [keeping accurate records](#) is critical. Know and follow our accounting policies to the letter, never falsifying or mischaracterizing any payment to a third party or allowing anyone else to hide the true nature of a transaction.

Consider This

A supplier I have worked with for many years has offered me a commission in exchange for signing an annual contract with their company. Is there any problem with this?

Yes, there is. In this case, a “commission” for doing business is another word for a kickback or a bribe, both of which are improper and possibly illegal. Report the incident immediately to your manager or the Legal department.

Learn More

[Anti-corruption Policy](#)

[Gifts and Entertainment Policy](#)

[Antitrust Policy](#)

[Social Media Policy](#)

[Employee Handbook](#)



Exchanging Appropriate Gifts

Business relationships take work and mutual cooperation. But at Scripps, we never show appreciation for customers, suppliers or other business partners by offering or accepting inappropriate gifts, entertainment or favors.

DOING GOOD MEANS ...

COURAGE

Following our rules and theirs: No matter how well-intentioned an offer may be, if it's excessive or inappropriate, it could look like an attempt to influence someone or gain an advantage. Scripps expects us to use good judgment with business courtesies and never allow them to affect our decision-making. Before giving or accepting any offers, make sure you're following the policies of both the giver and receiver. If you need approval, get it in advance.

Paying special attention to the rules for journalists: As a news and information company, we hold ourselves to the highest ethical standards and never allow anyone to improperly influence us. For that reason, if you contribute to our news operations, you may not accept gifts of any kind. See our [Gifts and Entertainment Policy](#) to learn more.



Spotlight on Courage

When is an offer acceptable?
When it ...

- Complies with the law and our policies
- Is nominal in value, such as a small meal or promotional item
- Is offered on the company's behalf, not an individual's
- Isn't in the form of cash or a cash equivalent, like a gift card
- Is offered openly and documented transparently
- Does not involve a government official

Consider This

I'm a sales executive, and I've been offered concert tickets valued at \$300 each. Is it OK to accept?

No, it's not. The value of the gift is too high, and it could look like an attempted bribe. Politely turn down the offer and explain our policy.



Exchanging Appropriate Gifts

Is this offer OK?

Before making or accepting an offer, ask yourself ...

- Am I a journalist, news manager or acting on behalf of the news product?
- Is it being offered for something unrelated to business?
- Can this create some kind of obligation?
- Is it being given to win business or some kind of favor?
- Is it offered frequently?
- Could it violate the law or either organization's policies?
- Could it look like a bribe or a conflict of interest to someone else?
- Would it damage our reputation?
- Is it excessive in value?

Did you answer “yes” or “maybe” to any of these questions? That’s a sign to stop and seek guidance. You may have to reconsider the offer, refuse it or return it. Scripps can help you handle it properly.

Asking for help: It’s always best to ask questions if you’re ever unsure if an offer is acceptable. The same applies if you’ve already received something that may be inappropriate. Reach out to your manager or the [Legal department](#). To learn more, see [Stopping Bribery and Corruption](#) and [Building Relationships With Third Parties](#).

Learn More

[Gifts and Entertainment Policy](#)



Following Insider Trading Laws

We promote fairness, both in our business and in the marketplace by following insider trading laws and making sure everyone has an equal opportunity to participate and invest.

DOING GOOD MEANS ...
COURAGE

Recognizing and preventing insider trading:

Insider trading happens when someone uses material nonpublic information to buy or sell securities or tips that information to others so they can invest. As Scripps employees, we can be exposed to information about our company or other public companies through our work. We have a responsibility to follow insider trading laws by securing that information – not trading on it or sharing it, even with family, friends or coworkers who don’t have a business need to know it. Insider trading is illegal and can lead to serious penalties for those involved and for our company.

Honoring trading windows: Some Scripps employees, such as executives, must follow additional rules and restrictions on when they can trade and what type of transactions they may conduct. Before you trade, make sure you know how these rules may apply.

Is this information ...

| | |
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| <div style="text-align: center;">  <p>Material?</p> </div> <p>It is if ... An investor might find it useful for making an investment decision (like buying, selling or holding stock). Examples include information about:</p> <ul style="list-style-type: none"> • Mergers, acquisitions or business plans • Changes in leadership • Stock splits or dividends • Sale of major assets • Projected financial earnings or losses • Pending lawsuits | <div style="text-align: center;">  <p>Nonpublic?</p> </div> <p>It is if ... It hasn't yet been released to the public, like through a press release or an official report.</p> |
| <p>Is the information both material and nonpublic? Don't trade on it or share it with anyone else. If you're not sure, contact the Legal department or the Chief Financial Officer for help.</p> | |

Following Insider Trading Laws

Consider This

While chatting with a vendor, I learned that they may soon acquire another company. The acquisition will probably increase the stock price. I know I can't buy shares in the company, but can I mention it to my father, as long as I don't advise him to trade?

No. Even though you wouldn't be advising him to trade, you would be sharing material, nonpublic information. "Tipping" someone with that kind of information could lead to civil or criminal penalties.

Learn More

[Insider Trading Policy](#)

[Employee Handbook](#)



Building Relationships With Third Parties

Our third parties are our partners – their good work spurs our success. We source responsibly and maintain close working relationships to ensure third parties meet their obligations, and we meet ours.

DOING GOOD MEANS ... **COURAGE**

Practicing due diligence: Third parties are an extension of our company. The actions they take – good or bad – can affect our reputation and the trust people place in the Scripps name. We also don't do business with restricted or sanctioned individuals, entities or countries. That's why it's critical that we choose third parties wisely. Follow our contracting and procurement policies and be objective in the decisions you make. Ensure that anyone working for us or on our behalf maintains our high standards.

Holding third parties accountable: Our due diligence obligation doesn't stop once a selection is made. We owe it to ourselves and our customers to carefully monitor the performance of our third parties once a contract is in place, communicating our expectations and watching for any signs of unethical or illegal activity. Be sure that third parties know and comply with our policies on [anti-bribery](#), [avoiding conflicts of interest](#) and [protecting confidential information and intellectual property](#).

Holding ourselves accountable: We know that the best partnerships are built on mutual respect. We deal fairly with our third parties and never engage in practices (such as manipulating, concealing or misrepresenting facts or abusing confidential information entrusted to us) that would give us an unfair advantage.



Spotlight on Courage

What aspects should I consider in selecting a third party?

Carefully consider and weigh objective criteria, such as:

- Experience
- Price
- Features
- Quality record
- Delivery record



Building Relationships With Third Parties

Consider This

My manager asked me to review some bids for an upcoming project, and I noticed that one of the bids is from a friend who has a reputation for doing good work and could really use the job. Is there anything wrong with recommending my friend for the project?

Yes. Your recommendation will not be based on an objective review of the bids but on your personal connection to this third party. To avoid the appearance of anything improper in the selection process, you should let your manager know about the relationship, remove yourself from the decision-making and allow your manager and others within Scripps to evaluate the candidates, fairly and objectively.

Learn More

[Delegation of Authority Guidelines](#)





Committed to Compassion

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Being respected for our work only has meaning when we share that respect with others, treating them with dignity and compassion and creating a safe, productive and welcoming place to work.

Promoting Equity, Diversity and Inclusion

Scripps is powered by a diverse and talented team. We take pride in our team and believe every individual, everywhere, should be respected, accepted and given an equal opportunity to contribute.

DOING GOOD MEANS ... *COMPASSION*

Practicing fairness and equity: Everyone at Scripps has a unique background, qualities and perspectives. Each person makes us stronger and smarter as a company, so we make sure every individual – whether an applicant, employee, customer or business partner – feels welcomed and valued. Follow equal employment laws to help us ensure that everyone has access to the resources and opportunities they need to contribute and grow with our company. See [Maintaining a Respectful Workplace](#) to learn more.

Eliminating bias: Whether we're aware of them or not, we all have biases that can influence us. Strive to keep personal biases out of the decisions you make for Scripps. Connect with colleagues on a personal level and as an ally. Focus on collaboration, asking questions, seeking new ideas and perspectives and never disregarding or excluding anyone's input. [Share your concerns](#) immediately if you believe discrimination is happening anywhere in our organization.



Promoting Equity, Diversity and Inclusion

How does Scripps promote equity, diversity and inclusion?

We take a companywide approach that's steered by these guiding principles:

Culture

We foster a culture that embraces each person's diversity and empowers employees to reach their full potential.

People

We attract and retain diverse talent through strategic recruiting and professional development to reflect the communities we serve.

Business

We create value and drive stronger results by leveraging new ideas and innovation that stem from a culture of inclusion.

Consider This

While interviewing a candidate, I had a definite rapport with one person with a similar background to mine. I'd like to hire this candidate, but I'm worried I might be choosing them because they're most like me. What should I do?

It's good to be aware of your possible personal bias, but to make sure that you're acting fairly and promoting diversity you should consider all candidates again carefully, looking at each individual's qualifications and the job requirements. Be sure to have others interview the candidates as well.

Learn More

[EDI at Scripps](#)



Ensuring a Safe and Healthy Workplace

A safe workplace is a better workplace, where people are healthier, happier and more productive. Scripps is committed to keeping our facilities and our people safe. It's our responsibility to help it stay that way.

DOING GOOD MEANS ... COMPASSION

Knowing and following the rules: Scripps cares about our well-being and expects each of us to follow the safety rules and procedures that apply to us, wherever we work. That includes taking any required safety training, using equipment properly and asking questions or [sharing concerns](#) about any potential safety hazards.

Being fit for work: To do our best work, we must be at our best – free from the influence of alcohol or drugs, which can impair our judgment and put anyone we interact with at risk. Never use, possess or distribute alcohol or drugs (either illegal drugs or legal controlled substances) while on Scripps property, when using our vehicles or equipment or while performing work for Scripps.

Having a violence-free workplace: We want everyone in our facilities – employees, vendors and visitors alike – to feel safe at all times, so we do not tolerate weapons or threats of violence. Stay alert and watch for any threatening behavior or acts of violence. Share your concerns immediately about any potentially harmful situation.

Learn More

[Substance Abuse Policy](#)

[Driving Policy](#)



Spotlight on Compassion

What should I report?

- Offensive comments
- Intimidation
- Threatening language
- Unwelcomed sexual advances
- Physical threats
- Weapons (actual or suspected)
- Substance abuse
- Unsafe conditions
- Safety rule violations

Maintaining a Respectful Workplace

Every Scripps employee makes a unique and valuable contribution. Scripps employees also deserve a respectful place to work, so we promote a culture where everyone is welcomed, included and treated fairly.

DOING GOOD MEANS ... COMPASSION

Putting people first: We only succeed when we work as a team, sharing common goals and values and treating every employee, contractor, visitor and business partner with respect. Be intentionally respectful in your actions and never allow anyone to be subjected to negative treatment.

Preventing harassment: At Scripps, we believe no one should have to work in a place where harassment, intimidation or bullying are tolerated. Harassment can take many different forms. It can be **physical, verbal** or **sexual** in nature and can even be unintentional. That kind of behavior can damage our relationships and our reputation, and it won't stand at Scripps. Be aware of how the things you say and do might affect others. Highlight fairness and respect in every interaction.

Check yourself

Is this harassment?

It can be if it creates a hostile or intimidating work environment.

Harassment can include:

- Unwanted physical contact, sometimes sexual in nature
- Intimidating or degrading words or names
- Offensive remarks or jokes, either spoken or written
- Physical gestures
- Sharing offensive materials
- Bullying or emotional abuse
- Sexual advances or requests

Preventing discrimination: We also believe everyone at Scripps deserves an equal chance to participate and succeed. Upholding employment laws helps us fulfill that pledge. For that reason, we make employment decisions based on actual business requirements – never on personal characteristics, stereotypes or other biases. Use care when hiring, screening, promoting or firing individuals and always follow equal employment opportunity laws.

Sharing concerns: Watch for signs of harassment or discrimination in others' behavior as well as your own. [Share concerns](#) immediately if you see or experience this activity anywhere in our operations. We won't tolerate any retaliation against you.



Maintaining a Respectful Workplace



Spotlight on Compassion

Do you make employment decisions for Scripps?

- ONLY base decisions on skills, requirements, qualifications and business needs.
- NEVER base them on stereotypes or factors like age, sex, race, color, religion, disability, national origin, veteran status, sexual orientation, gender identity or expression, family status, citizenship status, veteran status, genetic information, pregnancy or any other categories protected by law.

BEING RESPECTFUL means ...

Respecting the beliefs and opinions of every individual and welcoming their unique perspectives and contributions. See [Promoting Equity, Diversity and Inclusion](#) to learn more.

It DOESN'T mean ...

Feeling pressured to agree with someone else's opinions or positions or submitting to bullying or harassment.

Consider This

It's common during work for some members of my team to make jokes about a certain religion. I was worried someone might hear and be offended, so I politely asked them to stop. Am I being overly sensitive?

No, you're not. Humor is a great thing to share with coworkers, but it's never acceptable to make jokes at the expense of others based on their religion or any other differences. This goes against our values and, even if it wasn't meant to be offensive, it's not acceptable. If the behavior continues, share your concerns.

Learn More

[Anti-harassment Policy](#)

[Employee Handbook](#)



Keeping Personal Information Private

At Scripps, we believe personal privacy is a fundamental right. We protect that right by handling any personal information entrusted to us with care and following the laws designed to keep it secure.

DOING GOOD MEANS ... COMPASSION

Recognizing what's personal: Gathering, storing and handling personal information is an important part of our business. It's up to each of us to recognize personal information and protect it from loss, misuse or unauthorized disclosure.

Taking care: If you handle personal information for your job, follow our policies carefully as well as the data privacy and data protection laws that apply wherever we operate. If you're not sure how a law applies to you, ask the [Legal department](#) or the [Chief Privacy Officer](#) for guidance.



What is personal information?

It's information that could be used to identify someone, such as:

- Name, address, phone number or email
- Date of birth
- Social Security number
- Banking or credit card information
- Location data
- Health information



Who shares it with us?

A variety of people and entities share personal information with us, including:

- Employees
- Audiences
- Users
- Advertisers
- Suppliers
- Business partners



Keeping Personal Information Private

Preventing disclosure: To keep personal information secure, remember:

- Only use personal information for legitimate business purposes and collect only what you need.
- Never share it with unauthorized people or access it on unsecured networks.
- Never leave it exposed or send it to unattended devices, like printers.
- Dispose of it securely and in line with our policies.

Do you suspect a data breach? Contact the [Chief Privacy Officer](#) and your local IT department immediately so we can take quick action.

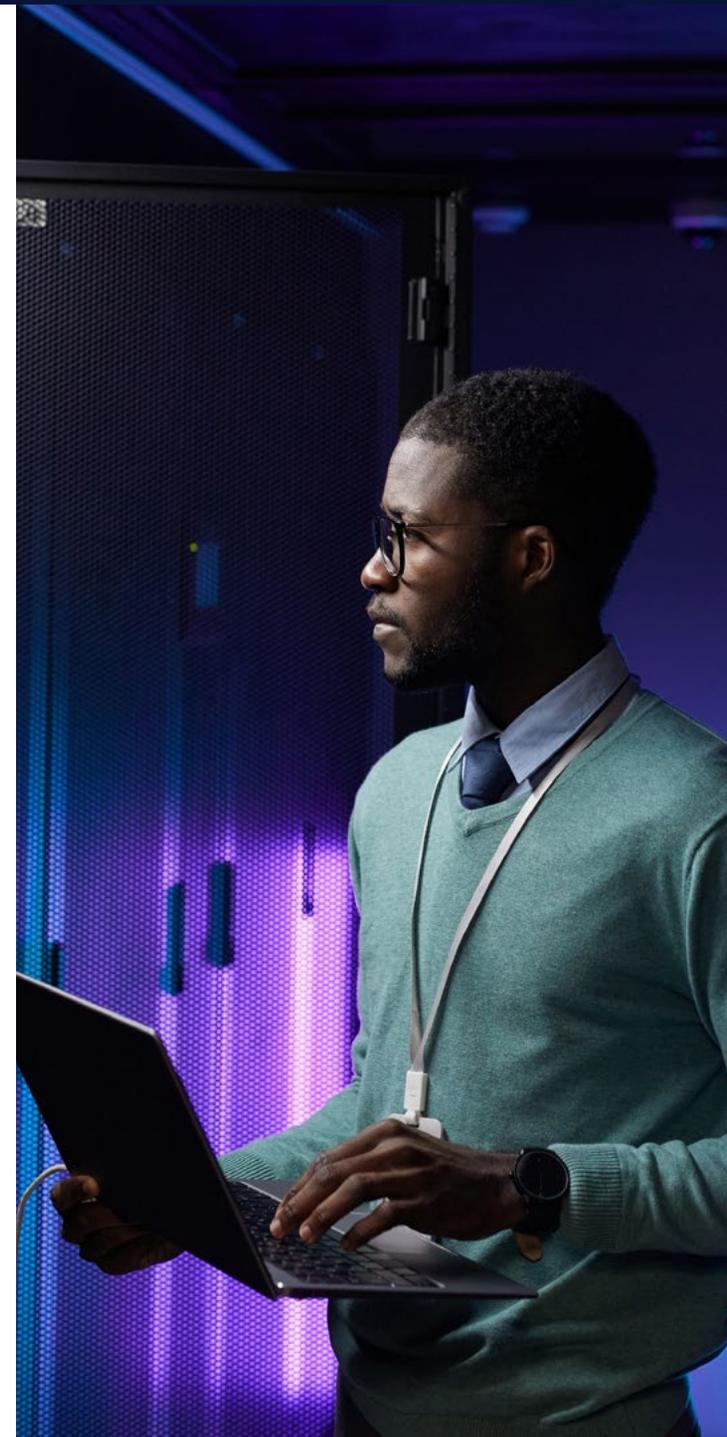
Consider This

A vendor that our team works with has told me they would like to send a get-well card to a colleague who has been sick. They have asked for this person's home address. Since we know this vendor well, can I share the address?

No, you should never share personal information like this with anyone who isn't authorized, and that includes even a trusted vendor. You should thank the vendor for their concern and ask them to send the colleague's card to their work address instead.

Learn More

[Identity Theft Protection Program](#)





Committed to Curiosity

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At Scripps, we believe true success doesn't come from simply doing what's required. It comes from curiosity – the spark that drives us to seek new paths, better solutions and stronger relationships to reach our full potential.

Maintaining High Standards

Scripps is one of the largest local TV broadcasters in America and reaches nearly every American through our national networks. Across the company, we are committed to quality, excellence and integrity in our work. Each of us must fulfill that commitment without fail.

DOING GOOD MEANS ...

CURIOSITY

Leading in our industry: No matter what jobs we hold at Scripps, we all help shape our company's reputation. When excellence is our driving force, it shows in our work and strengthens our standing in our industry. To help us ensure that the Scripps name remains synonymous with excellence, always maintain the highest professional standards in your work and your interactions with customers, vendors, colleagues and business partners.

Striving for excellence in journalism:

Our audiences expect high quality, objective journalism from Scripps. If you help create our news, help us maintain the public's trust by going the extra mile to be accurate and ethical. Comply with all laws and regulations in the newsgathering process and follow the rules of good journalism, such as verifying information, never plagiarizing another's work and putting public interest above your own. See [Participating in Political Activities](#) to learn more.

Learn More

[Journalism Ethics Guidelines](#)

[Social Media Policy](#)



Spotlight on Curiosity

What does excellence mean? At Scripps, it means being:

- Accurate
- Honest
- Curious
- Innovative
- Impartial
- Fearless
- Independent
- Willing to exceed expectations

Communicating Responsibly

Good communication plays a key role in every facet of our business. Fueled by curiosity, we ask tough questions, engage openly and seek the truth. When we communicate about Scripps, we do so proudly, but also carefully, with a unified and respectful message.

DOING GOOD MEANS ...

CURIOSITY

Speaking with one voice: The messages we send about Scripps must never conflict or mislead anyone. That is why only designated individuals may speak on our company's behalf – to ensure consistent messaging, uphold the law and protect our reputation and relationships. Unless you're designated, never speak on behalf of Scripps or give the impression that you represent our company.

Re-directing inquiries: Scripps carefully manages communications with financial analysts and members of the media. If you receive a request from these individuals, refer it to the [Corporate Communications department](#). Don't try to handle it yourself.



Spotlight on Curiosity

How do I use social media responsibly?

- If you post about Scripps, make it clear that you work for – but don't represent – Scripps.
- Never share private or confidential information (whether it belongs to Scripps or anyone else).
- Be professional and helpful in your posts.
- Never post anything offensive, harassing, discriminatory or illegal.
- Never post anything about our customers, business partners, suppliers or colleagues without their consent.
- Never share competitively sensitive information.

Why can't I speak for Scripps?

You run the risk of:

- Saying something inaccurate or even illegal about Scripps
- Making a promise we can't keep
- Leaking confidential information or intellectual property
- Saying something that conflicts with our values, policies or culture

Using social media: We understand that social media offers a powerful way to connect with friends and communities, but we also recognize the risks involved. When you use social media, communicate responsibly. Even if your intentions are good, never claim to represent Scripps or use social media to harm anyone, whether it's our company, our customers or one another.

Learn More

[Social Media Policy](#)

Competing Fairly

Competition is fair when everyone plays by the same rules and succeeds on their own merits – without turning to unfair practices. That’s the only way we want to get ahead – through hard work, superior performance and the drive to learn and grow.

DOING GOOD MEANS ...

CURIOSITY

Welcoming competition: We understand that competition is good for the marketplace and good for Scripps – it makes us better. We’re not afraid to let the quality of our work speak for itself. We’re also committed to following the antitrust and competition laws that apply to us. When we do, we help ensure a level playing field, where everyone is allowed to compete.

Promoting fair practices: If your work involves interactions with customers, competitors, suppliers or other business partners, highlight fairness in everything you do. Avoid any conversation that might sound like an improper agreement or a discussion of limiting competition. If you work in advertising or promotions for Scripps, don’t make promises we can’t keep or claims that aren’t based in fact.

Remember, we’re responsible for everything we say about Scripps. If you ever have questions about what’s fair and appropriate, contact the [Legal department](#) or the [Chief Ethics Officer](#).

Learning about competitors: Being competitive means being knowledgeable about the competition. If you gather intelligence about our competition or about suppliers, vendors or customers for your work, do so legally and ethically. Only use public sources of information. Never seek a company’s confidential information or use anything that’s illegally obtained. See [Protecting Confidential Information](#) to learn more.

Consider This

While attending a trade show, I was talking with some competitors. It was fine until they started discussing how they had obtained confidential information about another competitor’s pricing from a former employee. It didn’t sound right to me, I said so and left the room. Was that right?

Yes. If discussions arise about pricing or other competitively sensitive topics, make it clear to the others in the room that you believe the discussion is inappropriate, then leave the room immediately and contact the Legal department or the Chief Ethics Officer.



Spotlight on Curiosity

When is a conversation inappropriate? When it involves ...

- Raising or holding (“fixing”) prices
- Dividing markets, territories or customers
- Influencing or “rigging” the outcome of a competitive bid
- Preventing others from entering the market
- Refusing to deal with a particular competitor, vendor or customer
- Restricting production, sales or output

Learn More

[Antitrust Policy](#)



Committed to Community

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Our work connects us with countless individuals, families and communities. Acting as good neighbors and good stewards every day, we're aware of the impact we have on others and care for the well-being of our colleagues and those whose lives we touch.

Promoting Human Rights

We believe basic human rights are worth defending. In every aspect of our business, we promote dignity and fairness, respecting the rights of everyone, whether at Scripps or in the communities we serve.

DOING GOOD MEANS ... COMMUNITY

Preventing harm: Scripps supports efforts to protect human rights, both in our business and around the world. We are opposed to child labor, slavery, human trafficking, physical punishment or forced or indentured labor anywhere it occurs, and we don't do business with any organization that may be engaging in this activity. If you suspect human rights abuses, whether in our operations or those of our business partners, [share your concerns](#) immediately.

Ensuring compliance: We make sure our operations align with the principles of fairness and dignity by following the employment laws that apply to us wherever we do business. We expect the same commitment from our business partners – to respect human dignity in every interaction and decision and to promote diversity.

That includes standing up against unfair business practices, being equitable in all employment decisions and accommodating individuals with disabilities.



Spotlight on Community

How can I promote human rights?

Make sure that every Scripps workplace and those of our business partners offer employees:

- Safe working conditions
- Fair pay
- Reasonable and legal work hours
- The right to work freely

Learn More

[Corporate Social Responsibility at Scripps](#)



Participating in Political Activities

Fairness is embedded in everything we do. We encourage employee participation in the political process, but as a journalism company we must keep our activities legal and fair, and never compromise our integrity or our reputation.

DOING GOOD MEANS ...

COMMUNITY

Preserving our independence: Audiences know they can count on Scripps for reliable news and information. We are reliable because we remain independent. If you help inform our audiences, put honesty and accuracy first. Verify information and never allow political interests or assumptions to interfere with your fearless pursuit of the truth.

Participating ethically: While Scripps doesn't support specific candidates or campaigns, we believe every employee should stay engaged and support the candidates they like. But your activity should be personal, never impacting the workplace or your coworkers. Conduct yourself appropriately, both on and off social media, without sacrificing objectivity, and keep your activities separate from your work.



Spotlight on Community

Ethical participation means ...

- Using your own time and resources – not our company's
- Never acting or speaking politically on behalf of Scripps
- Respecting your colleagues' independence – never pressuring them to get involved

Following the law: We are committed to following all rules related to political activities. If you interact with legislators, government officials, regulators or their staffs, properly disclose your activity and make sure you never appear to be lobbying. Never contribute to a candidate or campaign in our name – Scripps will not reimburse you. The Scripps [Journalism Ethics Guidelines](#) provide additional information. Contact the [Legal department](#) with any questions.



Participating in Political Activities

Special rules for senior company leaders and journalists

If your job involves producing or delivering the news, you have greater responsibilities.



What to Do

- Vote
- Cover political news accurately and appropriately
- Notify your manager if you or a family member is involved in political activities.



What to Avoid

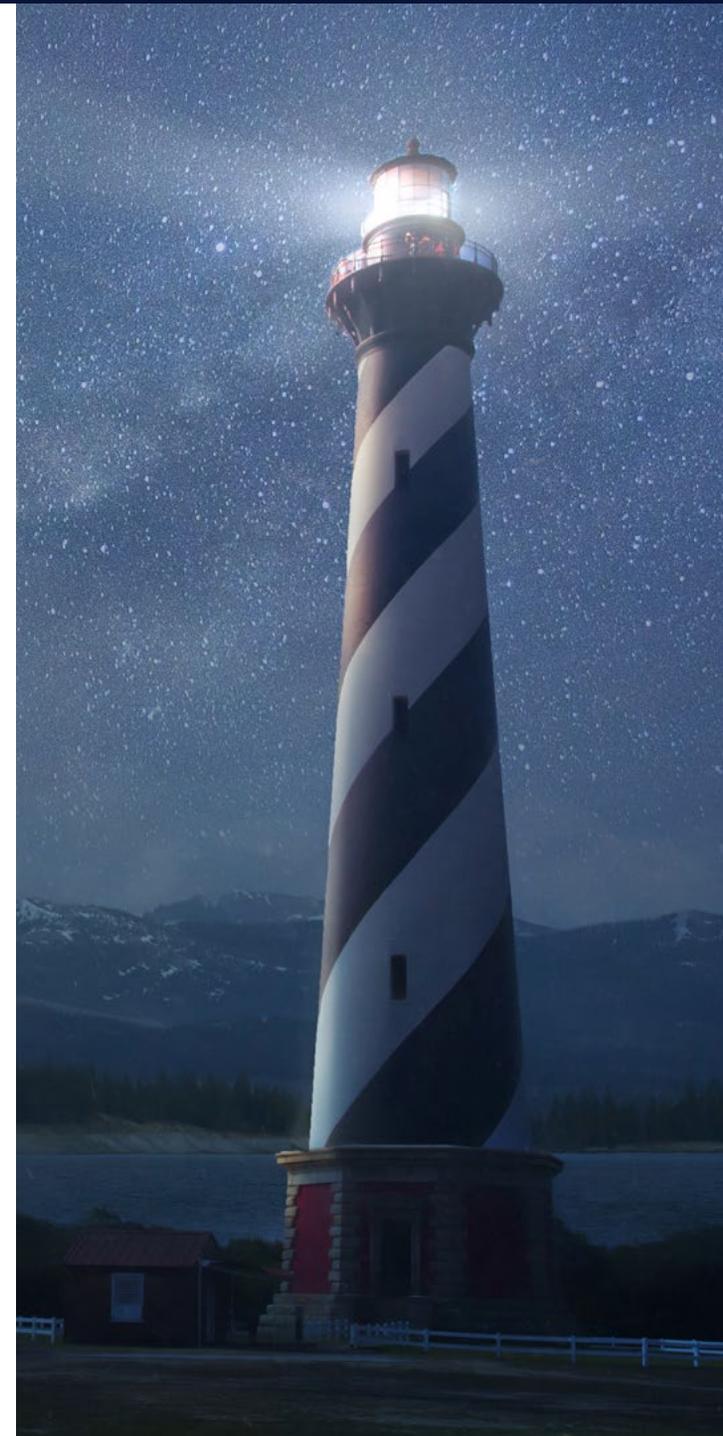
- [Conflicts of interest](#)
- Involvement in political activities or campaigns
- Activities that benefit a candidate or party, such as fundraising, organizing or contributing to campaigns
- Wearing clothing or posting stickers or signs to support a candidate or political position
- Using social media to advocate for political issues or express personal political opinions

Learn More

[Political Involvement Policy](#)

[Social Media Policy](#)

[Journalism Ethics Guidelines](#)



Supporting Our Communities

We're proud to be known as a socially responsible company, guided by strong ethical and moral principles. To fulfill our commitment to doing good, we support our communities and engage with them responsibly.

DOING GOOD MEANS ...

COMMUNITY

Doing our part as a company: With compassion as one of our values, we are aware of how our decisions and actions affect others. We're dedicated to supporting communities around the United States, by contributing financially and giving our time and talents. We encourage you (but don't require you) to get involved in these initiatives in whatever way feels right for you.

How we bring our commitment to life



Locally

In our local markets, we give back to the places where we live and work through:

- Social service projects to highlight important issues like domestic violence and homelessness
- Sponsoring or emceeding important local philanthropic, civic and business events
- Community outreach
- Programming



Nationally

Scripps hosts several major national events to address education, excellence in journalism and diversity and inclusion.

To find out more about our community activities and how you can get involved, [contact](#).

Supporting Our Communities

Doing our part as individuals: We're more than employees – we're active members of our communities. Scripps encourages us to offer our support as individuals through our own charitable and civic participation. If you do get involved on your own, keep it personal. That means making it clear that your personal views and actions are your own, and you don't represent Scripps or use company funds, time, property or our name unless you're authorized.

Consider This

As a manager, I'm always looking for team-building activities. There's a charitable organization in our area that I often volunteer for and thought about inviting my team to join me at an upcoming event. Is this a good idea?

It may not be. Remember that you're a manager, and your team may feel pressured to participate, even if you're not requiring them to. Instead, you should let your team know about company-sponsored events they could participate in if they so choose.



Being Good Environmental Stewards

To do good in our world, we do our best to protect it. At Scripps, we recognize our environmental impact and work as individuals and as a company to run a sustainable and responsible business.

Help Scripps keep our environmental promises by understanding and complying with the law and following any special requirements that apply to you. If you handle or manage the handling of regulated materials, know how to treat them safely and legally.

DOING GOOD MEANS ...

COMMUNITY

Reducing our footprint: We believe making the world a better place to live is our responsibility, so we are good stewards of our planet and its vital resources. You play an important role in reducing our impact on the planet and creating healthier communities. Be continually watchful for any activity that could be harmful and make environmentally responsible decisions in your daily work. If you see any potentially harmful activity (whether at Scripps or at a business partner’s facility), [share your concerns](#) immediately.

Keeping our promises: As a company, we take our environmental responsibility seriously, doing more than just complying with environmental laws. We go above and beyond to make environmental protection part of our corporate and personal mission.



Spotlight on Community

What can I do?

Adopt these good habits, both at home and at work:

- Reuse, reduce and recycle
- Conserve water, energy and paper
- Dispose of waste safely and properly
- Report any environmental risks

What are regulated materials?

They include:

- Hazardous waste
- Corrosives
- Toxic metals

These materials can be harmful if they reach the environment, such as through wastewater, air emissions, solid waste or spills.

Whether regulated or not, we have a responsibility to handle waste materials in a responsible and sustainable manner.

A Final Word

You've reached the end of our Code of Conduct ...

We realize it's a lot to take in. But reading the Code is one of your most important jobs as a Scripps employee. It shows you the kinds of challenges we face as a company and how we can handle them – as a team, committed to **Doing Well by Doing Good**.

Reading the Code is only the first step. Bringing it to life is what matters most. Apply the Code, our values and our training to your work each day and let them guide your conversations and decisions – no matter how small they may seem. That's how we show the world what Scripps stands for: a legacy of integrity that, with your help, will stand for generations to come.

If you have questions about anything you've seen in the Code, or you suspect anything that violates it, our policies or the law, share your concerns with any resource listed in the Code. Remember, just as journalism must never be silenced, neither should you. Your voice and your actions matter more than you know.

Thank you for all you do for Scripps and the communities we serve.



Compliance Corner

The following is a list of Scripps policies and other resources referenced in the Code. Note that this is not an exhaustive list. Visit [Compliance Corner](#) for a complete list of our policies.

[Anti-corruption Policy](#)

[Anti-harassment Policy](#)

[Anonymous Source Guidelines](#)

[Antitrust Policy](#)

[Credit Card Policy](#)

[Copyright Guidelines](#)

[Delegation of Authority Guidelines](#)

[Document Retention Policy](#)

[Driving Policy](#)

[Employee Handbook](#)

[Ethics/Legal Complaints](#)

[Gifts and Entertainment Policy](#)

[Identity Theft Protection Program](#)

[Insider Trading Policy](#)

[Journalism Ethics Guidelines](#)

[Political Involvement Policy](#)

[Regulation Fair Disclosure Policy](#)

[Social Media Policy](#)

[Substance Abuse Policy](#)

[Travel Policy](#)

[Whistleblower Procedures](#)



Getting Help

When you have questions or need guidance, we're ready to help. Contact one of the following resources:

To ask questions or report potential misconduct or other ethical concerns

- Your manager or another trusted manager
- Your local, division or corporate Human Resources department
- The Chief Ethics Officer at: ethics@scripps.com

Or call: **513-977-3891**

- The Legal department

Or contact:

The Scripps-operated Ethics Line
at **513-977-3886**

Or:

EthicsPoint

Online: www.ethicspoint.com

By phone: **888-397-4911**

Toll-free, 24 hours a day, seven days a week.

You will have the option to remain anonymous where permitted by local law.

To view company policies

Compliance Corner on Worklife

For legal questions

The Legal department

For ethical questions

Chief Ethics Officer

ethics@scripps.com

Call **513-977-3891** or **513-977-3886**

For information on company benefits

Local, division or corporate Human Resources representative

For financial questions

Chief Financial Officer

For analyst, investor or media requests

Corporate Communications

For concerns of data breaches

Chief Privacy Officer

Scripps reserves the right to modify this Code at any time, as necessary, along with our policies, procedures and conditions of employment. The Code is not intended as a contract or guarantee of employment.

No waiver of this Code may be made for a member of our Board of Directors or an executive officer without the written waiver of our Board of Directors. Any such waiver must then be disclosed to the company's stockholders, along with the reasons for granting the waiver.

Scripps also supports our employees' right to speak out publicly about matters of public concern and to participate in concerted activities and communications related to terms and conditions of employment. Nothing in any section of our Code or in any of our policies is intended to limit or interfere with that right. That includes activities protected under Section 7 of the U.S. National Labor Relations Act, such as discussions related to wages, hours, working conditions, health hazards and safety issues.