PREAMBLE

We, the people of Capitol Broadcasting Company, are individuals with diverse backgrounds, abilities, views and ideas. We are CBC’s most valued asset.

We value the vitality of individuals and their families. We provide a work environment that is safe, compassionate and rewarding. We commit to ensuring a healthy work-life balance that nurtures both our personal and corporate families.

We commit to building teamwork in the pursuit of excellence. We believe teamwork thrives in an environment of appreciation, respect and integrity. We practice clear, courteous and open-minded communication, without repercussions.

We consider it both our privilege and responsibility to serve and enrich the communities in which we work and live. We develop and support significant community projects, creating partnerships that benefit the public and CBC.

As a driving force in the community, we are a catalyst for positive change.

Our responsibilities to our stakeholders are as follows:

Employees
• We treat everyone with respect and dignity, regardless of job status.
• We practice honesty and moral treatment.
• We use clear, courteous and open-minded communication.
• We help our employees maintain a balance between their personal and professional lives.
• We show appreciation for quality work and commitment to the company.
• We commit to building teamwork throughout CBC. We work together and hold each other accountable at all levels to the Code of Ethics without repercussions.

Customers/Audience
• We provide the highest quality of products and programming that we believe appeal to our customers and audiences.
• We treat our audience and customers with respect and provide accurate, balanced information in a timely and professional manner.
• We listen to and respect customer and audience feedback and respond to feedback in a timely and appropriate fashion.

Community
• We hold ourselves to the highest community standards as individuals and as a corporation.
• We commit to being a responsible, caring, corporate partner through philanthropic and active involvement in the community.
• We serve as a role model of ethical and responsible business to improve the well-being of our community.

Owners and Management
• We uphold our reputation and image by observing the highest standards of legal and ethical conduct in business dealings.
• We practice clear, courteous and open-minded communication between managers and employees.
• We strive to make a profit ethically and legally.
• We identify and execute business strategies that result in sustained growth and profitability.
Advertisers and Sponsors
- We help our clients identify needs and achieve their goals with an emphasis on building long-term relationships.
- We maintain fair and competitive pricing without compromising our integrity or misrepresenting our competitors or ourselves.
- We work to ensure that our potential advertisers’ and sponsors’ content, products and services are consistent with CBC’s values.
- We treat our clients with respect, maintain confidentiality and provide exceptional customer service.

Suppliers, Lenders, Vendors
- We make every effort to seek vendor relationships that enrich the community.
- We maintain positive and honest relationships while achieving competitive pricing and quality service.
- We are truthful and respectful to suppliers, lenders and vendors.
- We make prompt payments when acceptable services and/or products are received.

Business Affiliates
- We honor our responsibilities to our business affiliates without sacrificing our company’s principles.
- We are committed to building teamwork with our business affiliates in the pursuit of excellence.
- We have fair and reasonable expectations of our business partners, and we communicate those expectations clearly.

Regulators and Governing Bodies
- We know, understand, abide by and, whenever necessary, challenge the rules and regulations of our governing bodies.
- We strive to improve public policy.
- We strive to develop and maintain open, healthy and constructive relationships with all applicable governing bodies.
- We incorporate self-regulation, self-inspection, and self-policing to address issues before they become problems, and we honestly report all violations to the governing body.
- We take a proactive approach in dealing with governing bodies to ensure the growth of our industry and the relevance of our products and services.

Industry Groups
- We are the epitome of positive leadership among our respective industries.
- We advocate and uphold industry standards.
- We stand firm against industry pressure. We uphold CBC and community standards of decency.
- We set a high standard of ethics and achievement within our respective industries.

Competitors
- We compete aggressively but fairly, while maintaining professionalism, courtesy and respect.
- We create and perform at higher standards, raising the bar of quality.
- We do not sacrifice our code of ethics in pursuit of winning.
- We are responsible and accurate in our representation of our product, our competitors and ourselves.

Compliance Statement

We pledge to uphold and promote this Code of Ethics and hold all accountable to it.