

Helping you  
do the right  
thing, always.



(From left) Joe, Associate Marketing Manager; Abe, Principal  
Technical Architect; Alison, Marketing Manager, Cox Automotive

CODE OF CONDUCT AT COX



### DEAR COX EMPLOYEES:

At Cox, our work is driven by a single purpose: to empower people today to build a better future for the next generation.

While our purpose is rooted in our company's past, it also inspires us to shape our tomorrow. It has always been our "North Star," and it will continue to guide us as we look to the future.

Our purpose is brought to life by the decisions we make and the actions we take every day. When we embody our first guiding principle — to always do the right thing for people, the company, and our planet — we uphold an ethical standard that has been an integral part of our culture from the beginning. The same unwavering principles that have enabled our success since 1898 will guide us as we build the Cox Enterprises of the 21st century.

As we continue to drive a "One Cox" culture, it is important that we come together to reaffirm our commitment to the company's foundational values. This year, we are rolling out a single, companywide Code of Conduct that will serve as a consistent guide for all Cox employees. It is designed to empower you to put our principles into action, and ensure that Cox continues to maintain its reputation for ethical conduct in all aspects of our business.

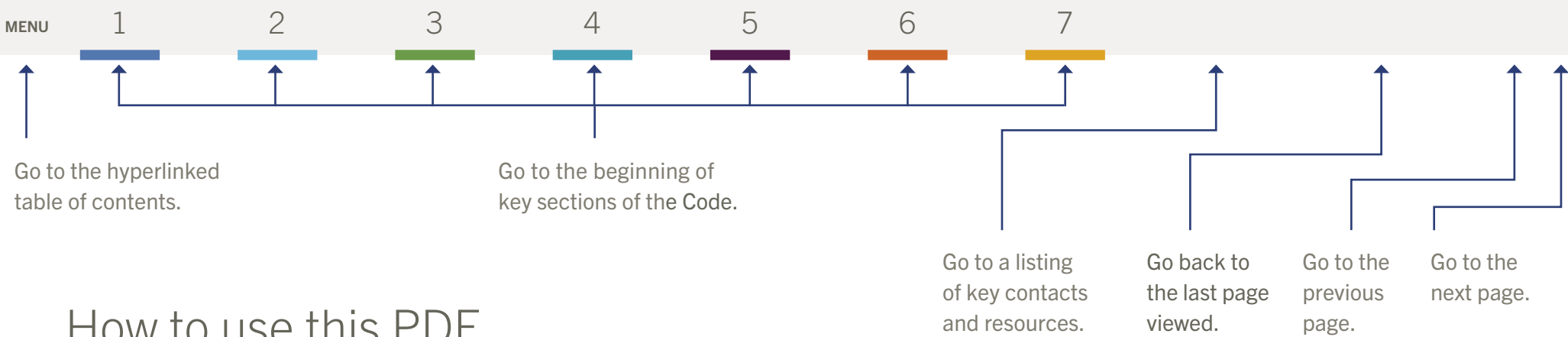
Please take some time to review the Code, and use it as a reference to help you resolve questions about ethics. Please don't hesitate to reach out to your manager, HR representative or Compliance Officer for further guidance.

Thank you for your commitment to upholding our standards, and for all you do to make our company and our world a better place.

Sincerely,

A handwritten signature in black ink that reads "Alex Taylor". The signature is fluid and cursive, with the first name "Alex" and the last name "Taylor" clearly distinguishable.

Alex Taylor  
President and Chief Executive Officer  
Cox Enterprises

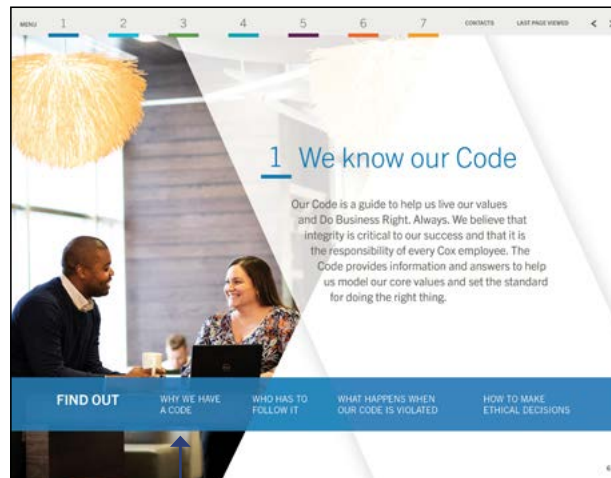


## How to use this PDF

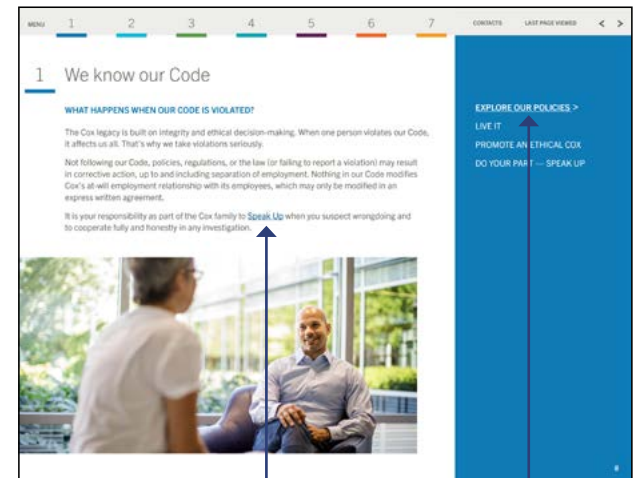
This interactive PDF includes built-in interactivity to aid navigation and provide easy access to resources.

This page provides a description of these features.

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



Each section title includes links to the covered topics.



Links to resources and related content are underlined.

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# What we stand for

## EMPOWER PEOPLE TODAY TO BUILD A BETTER FUTURE FOR THE NEXT GENERATION

Cox has always been committed to taking care of our employees, serving our customers, and improving the quality of life in the communities we serve. WHY we do this, WHY we come to work every day, is What We Stand For. It comes from our past, is grounded in our history, and serves as our “North Star.”

We’re here because those who came before us were dedicated to building a better future, and we’re committed to doing the same for the next generation.

## 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.

# 1 We know our Code

Our Code is a guide to help us live our values and Do Business Right. Always. We believe that integrity is critical to our success and that it is the responsibility of every Cox employee. The Code provides information and answers to help us model our core values and set the standard for doing the right thing.

**FIND OUT**

WHY WE HAVE  
A CODE

WHO HAS TO  
FOLLOW IT

WHAT HAPPENS WHEN  
OUR CODE IS VIOLATED

HOW TO MAKE  
ETHICAL DECISIONS

# 1 We know our Code

## WHY A CODE?

The purpose of our Code is to give all employees a clear set of shared guidelines for how we conduct ourselves as we do business. While no Code of Conduct can address every issue, situation, or regulation, our Code provides an overview of many of the laws, rules, and regulations that affect our business and how to embrace our values in every business decision and action we take.

## WHO HAS TO FOLLOW IT?

As a Cox employee, each of us has a responsibility to know and follow our Code and applicable policies. This applies whether you work for Cox on a regular, temporary, full-time, or part-time basis.

In addition, we have a responsibility to communicate with our partners, including vendors and clients, about the standards we've put in place for conducting business to ensure our company is one of the best to work for and with.





# 1 We know our Code

## WHAT HAPPENS WHEN OUR CODE IS VIOLATED?

The Cox 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.

Not following our Code, policies, regulations, or the law (or failing to report a violation) may result in corrective action, up to and including separation of employment. Nothing in our Code modifies Cox's at-will employment relationship with its employees, which may only be modified in an express written agreement.

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

LIVE IT

PROMOTE AN ETHICAL COX

DO YOUR PART — SPEAK UP



Michelle, Sr. Creative Director, meeting with Clarence, Director of Sustainable Supply Chain at Cox Enterprises



# 1 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 guidelines for ethical business conduct, but it doesn't have the answer to every question you might have or every situation you might encounter.

## WHAT IF...THERE'S A CONFLICT BETWEEN THE CODE AND A POLICY IN MY DEPARTMENT, WORK GROUP, OR FUNCTIONAL GROUP?

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

## NOT SURE OF WHAT TO DO? ASK YOURSELF:



Hyosub, Multimedia Journalist at Cox Enterprises

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.

Does it reflect our values?

NO. STOP.

NOT SURE? SEEK HELP.

YES.

Would I feel good about it if it was published online or broadcast in the news?

NO. STOP.

NOT SURE? SEEK HELP.

YES.

The action is probably okay. Still not sure? Ask for help.



## 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**

WHERE TO GO  
FOR HELP

HOW WE DON'T  
TOLERATE RETALIATION

ABOUT PEOPLE LEADERS'  
RESPONSIBILITIES

## 2 We honor our responsibilities

### WHERE TO GO FOR HELP

At Cox, we have an open-door policy and culture, where you should feel comfortable asking questions, seeking advice, or reporting concerns. There are many resources available to help you.



MANAGER



HUMAN  
RESOURCES



COMPLIANCE  
TEAM



HOTLINE  
PHONE



HOTLINE  
WEB

In most cases, the best way to get your questions answered and address issues and concerns is through open communication between you and your supervisor. If you are unable to address your questions or concerns with your supervisor or manager, you should feel free to speak to additional levels of management in your department or function. Your human resources business partner can also help you, or help identify the right person to answer your questions. If you do not feel comfortable with any of these options, you can contact your Compliance Team..

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

When you contact the Ethics Hotline, the information you provide is documented in detail and forwarded to the appropriate team within Cox for review and resolution. Rest assured that your concern will be promptly addressed and handled with the appropriate level of confidentiality.

We treat your concerns very seriously and will quickly and thoroughly review and take appropriate action.

Keep in mind that in order to protect privacy and confidentiality, we may not be able to communicate the results of an investigation back to you. Regardless, you will have the ability to know whether the review or investigation has been 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 concerning behavior

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



## 2 We honor our responsibilities



Jacqueline (left), Sr. Technology Service Manager at Cox Automotive, meeting with Christie, Sr. Marketing Specialist at Cox Enterprises

### 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. If you think that you or someone you know has been retaliated against for raising an issue, Speak Up.

### ARE YOU A PEOPLE LEADER?

In addition to every employee's responsibility to model Cox values, our people leaders have a special duty to lead with integrity and promote ethical decisions among your team. Set a good example and show your team, through your everyday words and actions, that you do business honestly, and in compliance with our Code.

As a leader, you must also report all violations or potential violations of the Code, Cox policy, or the law to your manager, your human resources business partner, or any member of your Compliance Team. Remember, you play an important role in helping maintain the highest ethical standards at Cox.

### WHAT IF...THE CONCERN I RAISE IS ABOUT MY SUPERVISOR — COULDN'T I LOSE MY JOB?

No. Cox has an Anti-Retaliation Policy for concerns raised in good faith. If the concern is about your supervisor, calling your HR business partner or the Ethics Hotline are good options. Retaliation by anyone, including your supervisor, will not be tolerated.

**Live it!** If you're a people leader, be a role model for ethical conduct.



# 3 We respect each other

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

## FIND OUT

HOW WE CELEBRATE  
OUR DIVERSE AND  
INCLUSIVE WORKFORCE

HOW WE FOCUS  
ON A SAFE  
WORKPLACE

HOW WE CREATE  
A POSITIVE WORK  
ENVIRONMENT

## 3 We respect each other

### WE CELEBRATE OUR DIVERSE AND INCLUSIVE WORKFORCE

Our employees are our most important resource, and we are committed to fostering an environment that builds on the unique talents and perspectives of our people. Bringing together great people with different backgrounds and experiences makes us stronger and more competitive in an increasingly diverse environment.

At Cox, we support an empowered culture that champions inclusion by embracing transparency, valuing every voice and respecting differences. Unique views and perspectives are valued by Cox so make sure your actions, including what you say and display at work, are professional and respectful.

Quite simply, maintaining an inclusive culture that respects and leverages diversity of thought and expression is a strategic enabler that drives our success. At Cox, YOU are valued, respected, and empowered to make your mark and build a better future!

### WE CREATE A POSITIVE WORK ENVIRONMENT

We are committed to maintaining a positive and respectful work environment that is free from discrimination and harassment.

We strictly prohibit unlawful discrimination based on race, color, religion, creed, gender, sex, sexual orientation, gender identity/ expression, pregnancy, ancestry, national origin, age, citizenship status, marital status, military or veteran status, mental or physical disability, medical condition, genetic information, and any other factor protected by applicable law.

We also do not tolerate any harassment (sexual or otherwise), bullying, or intimidation. This applies in the workplace and any work-related setting, such as while attending a business trip, business meeting or business-related social event, or while participating in a business phone or video conference call.

If you see or learn of any discrimination, harassment, bullying, or intimidation, you should immediately report it to your supervisor. However, if you feel uncomfortable or believe your supervisor is involved in the inappropriate behavior, you should reach out to your human resources business partner or any of the other individuals listed here. If you feel you are being harassed, you should immediately reach out to your human resources business partner or the Ethics Hotline. Managers and supervisors are also required to report any suspected or reported violations to their human resources business partners, the Ethics Hotline, or their Compliance Team.

### Did you know?

Our Equal Employment Opportunity policies apply to all aspects of employment, including:

- Getting a job at Cox
- Performance evaluations
- Promotions and advancement
- Pay and benefits
- Discipline and separation
- Participation in company-sponsored employee activities, events and programs



## 3 We respect each other

**Live it!** Treat everyone fairly. 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.**

### WE FOCUS ON A SAFE WORKPLACE

Cox values its most important resource: our people. We are committed to the belief that a safe and secure workplace is critical to the health and well-being of all employees, and to Cox's success. We all play critical roles in promoting a culture of safety where every employee feels safe and cared for. Looking out for our own safety as well as that of our colleagues is a shared value.

It is the responsibility of leaders and supervisors to prioritize safety and actively engage employees on the importance of safety. Each employee in turn must engage their supervisor, human resources, security, or the Ethics Hotline when an action or environment is assessed to be unsafe or poses a risk to the health and wellness of employees or visitors to our locations.

Cox supports a Drug-Free Workplace. Therefore, possessing, selling, using, or being under the influence of an illegal drug on company property, including company vehicles, or during working hours, is strictly prohibited, as is consuming alcohol on company property or during working hours unless at a Cox-approved event. Cox also will not tolerate any level of violence or threats of violence in the workplace. In addition, as allowed by applicable law, employees are prohibited from bringing any type of weapon onto company property unless approved by the senior vice president of Enterprise Security.

Each of us has the right and obligation to provide for and operate in an environment that ensures that every employee goes home safe.

### Examples of inappropriate behavior

- Joking about someone's ethnic background
- Unwelcome hugging or touching
- Discussing sexual activity or desire or displaying an obscene picture, cartoon, or poster
- Posting or circulating via email material that degrades or expresses hate against someone because of gender

### WHAT IF...THERE'S SOMETHING I CAN DO TO SAVE 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.

## 4 We follow the law

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.

Because we operate in various countries, our businesses and employees are subject to, and expected to comply with, a diverse set of local laws and regulations.

### FIND OUT

ANTITRUST AND  
COMPETITION LAWS

INSIDER TRADING  
LAWS

ANTI-CORRUPTION AND  
ANTI-BRIBERY LAWS

MONEY LAUNDERING AND  
PATRIOT ACT COMPLIANCE

## 4 We follow the law

### 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 your Compliance Officer.

### ANTITRUST AND COMPETITION LAWS

Cox competes fairly and complies with all antitrust and competition laws in the markets where we do business. These laws are often complex and vary by country, but generally are designed to stop competitors from creating agreements that prevent or restrict free competition. Violating antitrust and competition laws can result in criminal prosecution, as well as significant financial penalties.

### WHAT IF...THE NEW GUY ON OUR TEAM USED TO WORK FOR ONE OF OUR COMPETITORS. IS IT OKAY TO ASK HIM ABOUT THE NEW PRODUCT FEATURES THAT HIS COMPANY WAS DEVELOPING RIGHT BEFORE HE LEFT?

No, it is never appropriate to obtain information about our competitors in this way. We have an obligation to gather competitive information lawfully and ethically.

### DO:

- Be up-front and honest in your business dealings and promote positive business relationships everywhere we operate.
- Sell our products and services based on their great quality and performance.
- Avoid even the appearance of anything that could suggest something unfair or deceptive.

### DON'T:

- Communicate with our competitors about "fixing" prices or terms (for example, setting minimum or maximum prices, agreeing on pricing formulas, etc.).
- Communicate with our competitors about dividing up markets, clients or territories, or preventing companies from entering the market.
- Interfere with the competitive bidding process.
- Steal trade secrets.



## 4 We follow the law

### GATHERING COMPETITIVE INFORMATION

As part of doing business and understanding our marketplace, we can gather information about our competitors and their products and services. But we must only do this in a legal and ethical manner. We respect the confidential information of other companies and should never use nor condone the use of improper, illegal, or unethical means to obtain this information. When in doubt, contact your Compliance Team with questions or concerns.

#### WHAT IF...I RECEIVE INFORMATION ABOUT ANOTHER COMPANY THAT I THINK MAY BE CONFIDENTIAL?

Don't read it or use it for your own benefit or the benefit of Cox. Turn it over to your Chief Compliance Officer immediately.

### ANTI-CORRUPTION AND ANTI-BRIBERY LAWS

We conduct business with integrity. Never promise, offer, make, or authorize a payment or **anything of value** to influence a business decision or to gain any advantage.

#### REMEMBER:

- Strict laws prohibit offering anything of value to a government official, and many laws prohibit offering anything of value to private or nongovernmental persons or entities.
- Both you and Cox can be held criminally liable for bribes made on our behalf by third parties, so make sure that you know who you are doing business with.
- Never pay facilitation or "grease" payments to government officials to speed up routine functions like processing paperwork, delivering mail, turning on power, etc., even if these types of small payments are customary or legal in the country in which you are working.

Speak Up if you have questions or to report suspicious activity.

### Did you know?

"Anything of value" doesn't just mean money. It is very broad and 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.

## 4 We follow the law

### INSIDER TRADING LAWS

Your job at Cox may bring you into contact with material, nonpublic (or “inside”) information about our company or one of our clients, vendors, subcontractors, business partners, or competitors. If so, you cannot use that inside information to buy or sell stock or securities, or to engage in any other action to take advantage of that inside information. Passing along inside information to friends, family, or anyone outside the company is called “tipping,” and is also considered a form of insider trading.

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

It’s information that hasn’t been shared with investors or the public but might be important in deciding to buy, sell, or hold stock in a company. It could include things like budgets, sales or marketing forecasts, or information about gaining or losing a major client 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.

### TRADE COMPLIANCE LAWS

For our businesses that serve clients and maintain business relationships around the world, we are

committed to following trade compliance laws in the countries where we operate. Because our products and services move internationally, they are subject to several import and export laws. These laws regulate where and with whom we can do business. Violations of an import or export law, regulation, or restriction could have serious consequences for our company.

If your duties involve the movement of products or services across international borders, it is your responsibility to:

Understand — and comply with — the import and export laws, regulations, and restrictions in the countries where you work.

Refrain from transacting business with countries that are subject to U.S. trade embargoes or economic sanctions, or with individuals or entities owned or controlled by, or acting for or on behalf of, targeted countries.

Contact your Compliance Team for guidance anytime you see a counterparty request or a requirement, as part of any business transaction, that Cox boycott or agree to boycott any person, entity, or country.

Seek help if you have questions.

## What are trade compliance laws?

Trade compliance laws are laws that regulate the movement of goods and services across international borders. They include:

- **Export laws** that govern goods and services shipped out of one country to another country.
- **Import laws or regulations** that control goods and services entering one country from another country.
- **Sanctions regulations** that prohibit doing business with identified individuals and entities.

## 4 We follow the law



Erin, VP Ops Consumer Marketplace at Cox Automotive

### ANTI-MONEY LAUNDERING AND ANTI-TERRORIST FINANCING COMPLIANCE

We follow all laws and regulations designed to deter criminal activity and take precautions to help prevent money laundering and other financial crimes. We also make sure that we follow legal reporting requirements (e.g., Suspicious Activity Reports, Cash Transactions Reports) to assist in the prevention and deterrence of money laundering and the financing of terrorist activities.

**Live it!** Follow our company's due diligence practices to verify the identity of those with whom we conduct business. Be alert and watch for any financial activities that may be illegal or suspicious.

Do your part to help us prevent money laundering and terrorist financing:

**Know your clients and business partners.** Conduct business with reputable clients and partners from legitimate businesses. Exercise good judgment and understand the kind of business your clients or partners do and where their funds come from.

**Speak Up.** Report any suspicious activities or attempts to evade reporting or record-keeping requirements.



## 5 We do the right thing

We don't engage in activities or relationships that could make it difficult for us to impartially, objectively, and effectively carry out our jobs.

We are responsible when giving or receiving gifts and communicating about Cox. Remember, it is everyone's responsibility to protect our company and do the right thing. Always.

### FIND OUT

HOW WE AVOID CONFLICTS OF INTEREST

HOW WE COMMUNICATE ABOUT COX

ABOUT PROTECTING THE ASSETS OF OTHERS

ABOUT GIVING AND RECEIVING GIFTS

HOW WE CONDUCT BUSINESS HONESTLY AND ETHICALLY

HOW WE USE COMPANY-ISSUED DEVICES

HOW WE RESPECT THE PRIVACY OF OTHERS



## 5 We do the right thing

### WE AVOID CONFLICTS OF INTEREST

Our lives outside of Cox are filled with activities, but when those activities interfere with the decisions you make on Cox's behalf, that puts you and our company in an awkward position and can impact the job you do as an employee. A conflict of interest can happen when what you do (or what your family members do) outside of Cox interferes, or appears to interfere, with the job you do as an employee, or might provide an unfair advantage (financial or otherwise) to you or a family member. You should avoid any personal interest that affects your ability to act in the best interest of the company or makes it hard for you to perform your job honestly, objectively, and effectively. You have an obligation to avoid even the appearance of a conflict. Identifying potential conflicts of interest is not always easy. While it's not possible to list every instance that could present a conflict, there are certain situations in which conflicts typically arise. Here are a few examples that should be reviewed:

- a second job
- certain business and personal relationships
- investments
- outside political or charitable activities

For more details on how these situations can present conflicts of interest, please read the Conflicts of Interest Policy. Avoid these kinds of situations whenever possible and disclose them if they do arise by completing a Conflict of Interest Disclosure Form. If you have questions about the right thing to do in any situation, reach out your Compliance Team. Most conflicts can easily be avoided or addressed if promptly disclosed and properly managed.

### 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 you or someone else to be objective about the person or the company that provides them.

Avoid doing anything that might compromise (or appear to compromise) the decisions you make as an employee of Cox. You should not give gifts or entertainment that are not related to a legitimate Cox business activity, are unreasonable in value under the circumstances, or are illegal or inappropriate. Anything you receive that's valued at more than \$250 must be reported on a Gift & Entertainment Disclosure Form.

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 promise, offer, provide, or approve anything of value to someone affiliated with the government unless you obtain written approval in advance from your Compliance Team.

**Live it!** Know and follow the rules for gift-giving and gift-getting.

Don't give anything of value to a government employee without advance approval.

## 5 We do the right thing

### WE ARE RESPONSIBLE WHEN COMMUNICATING ABOUT COX

Every word we speak, write, or share about Cox 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 about Cox's products and services is consistent and accurate.

Unless you're authorized to handle media relations, don't speak on behalf of Cox about its products or services if contacted by the media. Refrain from doing so even if you know the answer, even if the caller says it's "off-the-record," and even if you think you're doing the right thing. By following our policies, you help us avoid sending confusing messages, or worse, sharing information that's incorrect and could have possible legal implications.

**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? Always check first with your supervisor, human resources business partner, or your Compliance Team before accepting an offer from an outside organization to speak as a representative of Cox.

**Requests from the Government.** If you receive an inquiry from a government official or agency, contact a member of your Compliance Team immediately.

**Social Media.** Social media offers a great way to exchange ideas and build relationships, but be smart, and use it in a way that's consistent with our values and our policies. If you wouldn't say it, write it, or share it in the workplace, don't say it, write it, or share it online.

Again, unless you're authorized to speak on our behalf, make it clear on any online postings that your views are your own and don't represent the views or official company position of Cox. Similarly, be careful not to publish any social media content that third parties might interpret as official Cox postings unless you're authorized to do so. Remember, you are responsible for any content that you publish.

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

Yes. Unless you are an official spokesperson for our company, you shouldn't communicate with the reporter. The information you have may be incorrect or incomplete and is best addressed by referring the reporter to your Corporate Communications and Public Affairs group.

## 5 We do the right thing

### WE USE COMPANY-ISSUED DEVICES PROPERLY

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

In general, you should limit your use of Cox's assets, including company-issued physical or technology assets, for your personal activities. Limited personal use of things like email, internet access, phone, and fax machines is okay as long as it:

- Doesn't interfere with your work (or anyone else's).
- Doesn't violate the law or our policies.
- Doesn't cause Cox to incur additional costs.
- Isn't for personal gain or improper purposes.
- Doesn't compromise the security of our technology systems or networks.

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 company assets.

### WE CONDUCT BUSINESS HONESTLY AND ETHICALLY...

#### ...WITH 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.
- 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 and confidential information.

#### ...WITH OUR SUPPLIERS

We choose suppliers based on factors like quality, cost, 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 (including our Conflict of Interest and Gifts and Entertainment policies), and Cox's best interests.

We expect suppliers to respect and protect our confidential business information and, in return, we respect and protect theirs. These and other expectations of suppliers are outlined in our Supplier Code of Conduct.

## 5 We do the right thing

### WE CONDUCT BUSINESS HONESTLY AND ETHICALLY...

#### ...WITH THE GOVERNMENT

Our divisions are proud to call a number of federal, state, and local governments our customers. As with all our customers, we work to be a responsible partner, but we recognize that the requirements on government contracts may be stricter than those governing our commercial contracts.

#### Responsible for a Government Contract?

- Understand the unique legal requirements and restrictions associated with this work.
- Know the rules around the procurement process if dealing with the government.
- Be accurate, current, and complete in anything you submit.
- Follow the rules on gift-giving (see [We Understand the Rules About Gifts and Entertainment](#)).

Being transparent, accountable, and open is the key to not only winning, but also keeping, our government business.

#### ...WITH OUR AUDIENCES

In our media businesses, 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."



Robert, VP Talent Acquisition, meeting with Ty, Sr. Manager CSR Environmental Sustainability, at Cox Enterprises



## 5 We do the right thing

### WE RESPECT THE PRIVACY OF OTHERS

Keeping personal information safe is the foundation of trust.

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

### WE PROTECT THE ASSETS OF OTHERS

Our clients and business partners count on us to keep the assets they entrust to us safe and secure.

Employees may also handle third-party funds and have a duty to do so responsibly. Mixing another's funds or assets with your own, or commingling is never allowed — even if it's temporary. There are serious legal consequences for commingling third-party funds.

#### NEVER:

- Deposit checks made payable to a third party in your personal account.
- Withdraw money from a third party's account to pay personal expenses.
- Transfer funds from a third party's account to your own without approval and documentation.

### We:

- Collect only the personal information that we need
- Are open and honest about how we collect, use, and disclose personal information
- Provide appropriate choices regarding personal information
- Properly destroy personal information in our possession using methods authorized by the company when it is no longer needed for business purposes
- Notify our customers and employees promptly (in accordance with applicable laws) if personal information has been compromised
- Comply with all policies, processes, and guidelines and take reasonable steps to protect the security of personal information
- Take the appropriate and required training to understand our privacy and information security obligations
- Report violations of any policy, process, or guideline

We recognize that the security and privacy of personal information is everyone's responsibility.



## 6 We safeguard our company's assets

We're loyal, and we follow the generations of loyal employees who came before us. From the intellectual property we create to the vehicles we drive and the computers we use, we take care of what's ours. It's just part of doing business right.

### FIND OUT

ABOUT PROTECTING SENSITIVE INFORMATION

ABOUT PROTECTING COMPANY ASSETS

HOW WE WATCH OVER OUR BRAND

ABOUT INTELLECTUAL PROPERTY WE CREATE

HOW TO MAINTAIN AND MANAGE OUR RECORDS

## 6 We safeguard our company's assets

### WE PROTECT OUR SENSITIVE INFORMATION

As part of your job, you may have access to sensitive information about Cox. Sensitive information includes information that is not available to the public and might be of use to competitors, or, if disclosed, harmful to our company or its clients. It is your responsibility to keep this sensitive information safe and protect it from unauthorized disclosure, use, or loss. It is also important to be careful when discussing or communicating any sensitive information, such as over the phone or by email.

If you come to Cox from another company, honor your obligations to protect that company's sensitive information, trade secrets, and intellectual property. And if you leave Cox, don't use or share our sensitive information, trade secrets, or intellectual property with your new employer or third parties. By protecting our sensitive information, we're protecting our competitive advantage in the industries in which we operate.

### EXAMPLES OF OUR ASSETS

**Physical assets.** Office furniture, funds, property, phones, computers, technology, equipment, and inventory.

**Information assets.** Things that are unique to Cox like strategies, processes, system documentation, and business plans. Intellectual property like trademarks, trade names, and copyrights. Other sensitive information about our employees, customers, or business.

**Things that make Cox ...Cox** Our name, our brands, and our client relationships.



Working with customers can involve sensitive information that should remain private.

## 6 We safeguard our company's assets

### WE PROTECT OUR COMPANY ASSETS

The physical and technology resources provided by the company to do our jobs every day are considered Cox company assets. Many of these resources contain our sensitive information assets — such as intellectual property, business records, and personal information of our employees or customers.

Each of us is responsible for protecting our assets from theft, loss, waste, or abuse. Cybercriminals regularly try to access our systems to steal our valuable information assets or do other harm. When you help protect our assets, you play a critical role in protecting our employees, customers, partners, and competitive advantage.

Protecting our information assets from theft or compromise depends on each of us protecting our technology assets from cyber threats.

#### DO:

- Keep passwords and PINs secure, and don't share them with anyone. Contact the IT department for password manager tool suggestions to help you manage passwords and PINs.
- Ensure the physical security of technology assets assigned to you; maintain a clean and secure work area.
- Report suspicious or phishing emails or texts, unauthorized access to information, and suspected attacks on our technology systems.
- Only use secure networks and internet connections.
- Ensure that any person receiving information assets understands any restrictions on use.
- Handle sensitive information assets with care and disclose only to those with access rights and a valid business need.
- Lock your computer screen or mobile device when not in use and secure documents from common areas such as copiers and printers.

#### DON'T:

- Install unauthorized software, applications, hardware, or storage devices on company assets.
- Modify or disable services or applications deployed by Cox on assets or equipment.
- Access the company network through unauthorized applications or devices.
- Discuss information assets in public places where others could hear you.
- Download music or video files from peer-to-peer networks.



## 6 We safeguard our company's assets

### WE WATCH OVER THE COX NAME AND BRAND

Widely recognized and respected, our name, our brand, and its connection to a rich heritage is one of our most valuable assets. Each of us has an obligation to protect the Cox name by following our brand standards and by reporting any misuse, whether internally or externally.

### WE PROTECT COX

#### WHAT IS A WORK MADE FOR HIRE?

Any idea, invention, discovery, development, concept, or process related to our business that you develop by yourself or with others while you work here belongs to Cox. If something you develop is later copyrighted, it is called a “work for hire,” and Cox is considered the author.

#### 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 RESET 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.

### INTELLECTUAL PROPERTY

This is our knowledge base and includes things like trademarks, domains, patents, copyrights, and trade secrets. Remember, copyrightable material you generate in the course of your employment with Cox is owned by the company as “works made for hire” under the Copyright Act.



Adam, Sr. Art Director at Cox Enterprises

## 6 We safeguard our company's assets

Michelle, Account Executive at Cox Communications



### WE MAINTAIN ACCURATE RECORDS

The records we create and maintain are important company assets, too. Always be honest and accurate in what you record. Follow any record-keeping requirements associated with your job and support transactions with the documentation necessary to provide a complete, accurate, and auditable record. Before you commit Cox or its funds, make sure you have obtained all necessary approvals and that you are authorized to sign any documents.

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.

If you suspect someone of misrepresenting or falsifying information or engaging in a questionable accounting or auditing activity, Speak Up. You should also consult the record retention schedules for your business unit for further guidance.

### WHAT IF...I DON'T WORK IN FINANCE OR ACCOUNTING?

You still have a responsibility to maintain the integrity of our record-keeping. 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.



# 7 We are good neighbors

We put our values into action in communities across the globe. 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 GIVE BACK

HOW WE HONOR OUR ENVIRONMENTAL RESPONSIBILITY

Grey (top right), Manager Product Operations at Cox Enterprises, with friends at the annual PRIDE parade



## 7 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.

**Charitable contributions.** We encourage your personal involvement in the communities where you live and work, and your contributions of time or money to organizations you care about. You should not, however, use or donate Cox funds or assets for any charitable activity unless you receive approval in advance from your Compliance Team.

**Human rights.** As a company, we believe that every person deserves to be treated fairly and with dignity. We respect the principles contained in the Universal Declaration of Human Rights and work to ensure that our activities reflect our commitment to respecting human rights and human rights-related laws. This means that we do not knowingly do business with companies or individuals that engage in child labor, forced labor, human trafficking, or other human rights abuses.

**Political activities.** We respect your right to engage in personal political activities, but keep in mind that this right should never conflict with your obligation to help Cox maintain a positive and respectful work environment, free from harassment.

**CoxPAC.** Our company-sponsored political action committee accepts voluntary contributions from eligible employees to ensure that Cox has a voice with policy makers in the United States. We comply with all applicable laws and regulations governing solicitations for contributions and disbursement of funds. Participation in any CoxPAC (federal or state) is voluntary, and no employee will be required to participate.





## 7 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, clients, suppliers, and business partners.

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.

**Live it!** Reduce and recycle wherever possible and report any dangerous or hazardous environmental conditions.



Larry, VP, Field Engineering & Operations, Cox Communications, and Robin, Assistant General Counsel, Cox Enterprises, work with students from the Boys & Girls Club to build tablets

# Contacts

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

We support your right to speak out publicly about matters of public concern or to participate in certain activities related to the terms and conditions of your employment. Nothing in this Code or in any of our policies is intended to limit, restrain, 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.

