



THE E. W. SCRIPPS  
COMPANY

# Code of ETHICS

*Keeping the Public Trust*



Compassion



Courage



Excellence



Fairness



Integrity



Respect

“...each of us contributes to sustaining the kind of working environment where ‘doing the right thing’ is always the first priority and where public trust is always the objective.”

Richard A. Boehne, President and CEO

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**THE E.W. SCRIPPS COMPANY MISSION**

The E.W. Scripps Company strives for excellence in the products and services we produce and responsible service to the communities in which we operate. Our purpose is to continue to engage in successful, growing enterprises in the fields of information and entertainment. The company intends to expand, develop and acquire new products and services, and to pursue new market opportunities. Our focus shall be long-term growth for the benefit of shareholders and employees.

LETTER FROM THE PRESIDENT AND CEO

Dear Scripps colleague,

At Scripps, our mission is to be people of purpose, and we developed a “Code of Ethics” to guide us as we pursue the highest standards of journalistic and organizational integrity.

We are proud that Scripps has a reputation for organizational integrity that is exemplary, and our Code of Ethics makes it clear that we’re serious about maintaining the public’s trust.

As evidence, we held training programs at all of our media properties when the code was rolled out. We review the code at new-employee orientation to ensure new employees understand our commitment. And we have appointed a chief compliance and ethics officer to enforce the code.

I encourage you to regularly review the attached “Code of Ethics.” More importantly, I encourage you to live the code every day.

Should you ever have questions about an ethical issue, please reach out to your supervisor or call our confidential Ethics Line at 888-397-4911.

Sincerely,

A handwritten signature in black ink that reads "Rich". The letters are cursive and fluid, with a large initial "R".

Rich Boehne  
President and CEO

## INTRODUCTION

# Purpose

Our media businesses are grounded in the company's tradition as a journalistic enterprise. As such, we at The E.W. Scripps Company honor a bond of trust that exists between the company and the public it serves. We strive to conduct business in a principled manner to protect the valued relationships that exist between the company and its stakeholders. The company's stakeholders include, but are not limited to, readers and subscribers, viewers, news sources, advertisers and agencies, vendors, contractors, affiliated networks, stockholders and employees. It's our goal for Scripps to be an organization that acts ethically. *The E.W. Scripps Company Code of Ethics: Keeping the Public Trust* is intended to help us achieve that goal. It provides guidance for how ethical standards should be applied in the course of doing business.

# Our Commitment

What follows is a declaration of the company's fundamental values and principles. Adherence to federal, state and local laws and regulations, as well as to company policies and procedures, is the required minimum standard for ethical conduct. Our commitment to ethical behavior, however, extends beyond compliance with the law. It also includes adherence to fundamental, or core, values and principles that define the culture and tradition at Scripps.

It's our obligation as employees to rely upon these values and principles as we make decisions and act on behalf of the company. It's also our obligation as employees to have a clear understanding of what those values and principles are. If you need help determining an ethical course of action, do not hesitate to ask your supervisor or other appropriate source. For a list of others who may be able to help, refer to the "Seeking Guidance" section of this brochure (see page 17).

For leaders and managers, it's our obligation to model and clearly communicate ethical standards. This code of ethics applies with particular emphasis to officers, board members, executives and managers.

It's important to note that this code of ethics is illustrative. It is not intended to describe every desired or prohibited action. The company relies upon the skills, sound judgment and intention of its employees to "do the right thing."

## OUR CORE VALUES AND POLICIES TO GUIDE OUR WORK

In our role as stewards of the public trust, we are committed to the following core values:

6

### Compassion

Care for our colleagues and those we serve. Be empathetic and helpful as the situation warrants.

7

### Courage

Take heart in doing the right thing, even when doing so might be inexpedient, personally difficult or uncomfortable.

8

### Excellence

In all that we do, distinguish our accomplishments by achieving the highest degree of excellence.

9

### Fairness

Treat others equitably and impartially. Be dedicated to objectivity and avoid prejudice.

12

### Integrity

Establish the highest possible standards of conduct in our work and in our professional relationships.

15

### Respect

Hold others in high regard and treat all with dignity.

These core values represent our commitment at Scripps to the highest ethical principles. Each is present in the actions and decisions we face. The following examples illustrate some of the ethical responsibilities we have as Scripps employees.

**Compassion** means having concern for the welfare of our colleagues, those whose lives we touch as journalists and those with whom we do business. It means being aware of the effect that decisions and actions in the workplace might have on others.

**Examples of compassion in our relationships with each other:**

- Offering productive feedback to help each other achieve professional and strategic goals.
- Offering to support others when workload requires/permits.
- Supporting one another in difficult circumstances.

**Examples of compassion in our relationships with those we serve and with whom we do business:**

- Fulfilling our responsibility as a news and information organization to promote the broader public good.
- Protecting the confidentiality of sources.
- Protecting the innocent from harm.
- Reporting complex issues accurately and with sensitivity.

**POLICIES TO GUIDE OUR WORK**

**WORK/LIFE:** Scripps has established the Scripps LifeManagement Program to help employees address personal and professional issues that might be affecting their performance in the workplace. Some common concerns that LifeManagement provides assistance with include managing change in the workplace, finding quality childcare, and balancing work and family obligations. You can obtain more information about the Scripps LifeManagement Program by calling 800-424-4616 or by contacting your human resources representative.

Scripps recognizes that drug and alcohol problems are often treatable. However, to provide a safe and effective working environment, the company has instituted some common sense prohibitions against substance abuse and alcohol misuse in the workplace. Employees are prohibited from using, possessing, distributing, selling, manufacturing or being under the influence of alcohol or illegal drugs while on company time, company business, company premises or in company vehicles. There may be occasions, however, when alcohol is served or when alcohol is brought onto Scripps premises as part of a company-authorized event. While consuming alcohol on such occasions is not prohibited, employees are expected to observe legal and common sense guidelines.



**Courage** means standing up for professional principles, even when doing so may carry some personal cost. It's courage that enables us to "do the right thing," as a company and as individual employees.

**Examples of courage in our work with each other:**

- Admitting mistakes.
- Asking for help.
- Protecting company assets.
- Reporting suspected or observed unethical behavior.

**Examples of courage in our work with those we serve and with whom we do business:**

- Being the champion for unpopular positions.
- Protecting confidential information.
- Reporting the truth.
- Resisting undue influence in news reporting and programming.

**POLICIES TO GUIDE OUR WORK**

**ETHICS LINE:** Scripps has established an Ethics Line that allows employees to safely and anonymously report observed or suspected unethical conduct. For details on how to use the Ethics Line, see page 18.

**Excellence** is characterized by individual commitment to high professional standards. That can include taking extra steps to ensure accuracy in our news reporting, exceeding the needs of our customers and developing innovative business solutions.

Excellence also applies to the organizational climate. Scripps provides a highly effective working environment where employees can work well together and take pride in their company. This results in an organization that is a preferred place to work.

**Examples of excellence in our work with each other:**

- Appreciating a job well done.
- Being conscientious.
- Being hardworking and productive.
- Being innovative.
- Encouraging an entrepreneurial spirit.
- Generating new business.
- Taking pride in what we do.
- Standing for something that is good.

**Examples of excellence in our work with those we serve and with whom we do business:**

- Being dedicated to the highest possible level of customer service and satisfaction.
- Ensuring the highest standards of accuracy, fairness and objectivity in news reporting.

**POLICIES TO GUIDE OUR WORK**

**OPEN DOOR POLICY:** Scripps believes that good communication is a key to excellence. The company encourages productive, open dialogue between employees and supervisors to resolve work-related issues. Employees should feel free to discuss workplace issues with supervisors, department heads or human resources representatives without fear of retaliation.

**PERFORMANCE MANAGEMENT:** Excellence is achieved through the professional growth of the company's employees. To encourage professional growth, the company conducts formal reviews to evaluate employee performance. These formal performance reviews are in addition to informal conversations between employees and supervisors that occur daily in the course of doing business.

**Fairness:** A strong sense of fair play is a fundamental value at Scripps. In our news reporting and in all of the ways that we conduct business, fairness is a guiding principle. In the workplace, that means providing a level playing field on which all are given an equal opportunity to succeed. Practices of recruitment, selection, hiring, training, transfer, promotion, termination and compensation are based on this basic value.

For journalists, fair play means publishing or broadcasting accurately and thoughtfully reported stories. The use of anonymous sources is discouraged, but the issue is evaluated on a case-by-case basis. The use of anonymous sources is allowed only when the anonymous source is made known to and approved by at least one of two top newsroom executives, usually the editor or managing editor at our newspapers, or the station manager or news director at our broadcast television stations.

In our business dealings, fair play means treating all equitably. Decisions should be based on reasoned assessment of a transaction's value in helping the company achieve its strategic goals. Business decisions should never be based on favoritism, self-interest or personal gain.

**Examples of fairness in the workplace:**

- Encouraging teamwork.
- Giving credit where credit is due.
- Hiring and promoting the most qualified candidate.
- Maintaining an inclusive working environment.

**Examples of fairness in our news coverage:**

- Providing accessible forums for the expression of divergent points of view (including letters to the editor, guest columns, community comment segments, etc.).
- Providing print or broadcast exposure for a correction that is as equal as possible to the exposure given to the inaccuracy.
- Thorough print and broadcast news reporting that thoughtfully examines issues and subjects from as many angles as necessary.

**Examples of fairness in our business dealings:**

- Bidding supply contracts in an ethical way by keeping bidders' data confidential and awarding contracts based solely on the merit of the proposals.
- Negotiating transactions consistent with the company's commitment to treat external resources in the same professional manner we expect to be treated.

## POLICIES TO GUIDE OUR WORK

**ANTITRUST CONSIDERATIONS:** Scripps complies with all laws pertaining to antitrust and competition. Such laws generally forbid competitors to fix or control prices, terms, conditions of sales, customers, markets, boycotts, or to engage in any other conduct that restrains competition. Scripps employees are required to consult with corporate management when concerns arise during the consideration of any action of competitive significance.

**BUSINESS GIFTS, MEALS, SERVICES AND ENTERTAINMENT:** It is contrary to Scripps policy for employees to accept a gift or gratuity when it is given with the expectation of reward or influence. Any gift valued at \$100 or more could be perceived as an improper attempt to influence judgment or actions, and acceptance of any such gift is therefore prohibited. On any occasion where the intent of the giver (a vendor or any entity that may seek to do business with Scripps) is unclear, the employee must not accept the gift. The acceptance or giving of bribes, kickbacks or other remuneration from or to any government official, political party, corporation, individual or organization is prohibited. If employees have questions about the appropriateness of a gift, they should ask their immediate supervisor.

**COMMUNITY INVOLVEMENT:** Scripps employees are encouraged to become involved in their communities, but should be aware of potential conflicts of interest. Reporters and editors occupy unique positions in their communities and must be particularly sensitive to potential conflicts. Scripps employees and affiliates in positions of authority should not pressure or coerce employees to financially support or participate in outside charities or organizations.

**COMPANY OPPORTUNITIES:** Employees are prohibited from diverting opportunities available to Scripps for personal benefit or for the benefit of family members, or others, or act in a manner that could reasonably create the appearance of such diversion.

**EQUAL EMPLOYMENT POLICY:** Scripps is an equal opportunity employer. The company bases its employment decisions on sound business practice without regard to race, religion, color, national origin, sex, sexual orientation, age and disability or on any other basis that would be in violation of any applicable federal, state or local law. The company will make reasonable accommodations for qualified individuals with known disabilities. For more information on company policies regarding non-discrimination, see the employee handbook.

**INVESTMENTS:** Scripps employees and members of their immediate family should not have ownership interest in enterprises that conduct or seek to conduct business with Scripps, that compete with Scripps or that seek to have a business relationship with Scripps, except an interest that has been properly disclosed and approved. Any interest in the form of publicly traded securities in such enterprises, so long as the interest does not exceed 1% of the outstanding shares of the company in question, does not have to be disclosed. Refer to the section on Conflict of Interest (see page 13) for the definition of immediate family.

**OUTSIDE AFFILIATIONS/COMPETITION WITH THE COMPANY:** Scripps employees may not, directly or indirectly, compete with the company in any manner whatsoever. They also are prohibited from helping others to do so. While having a second job may not be prohibited, the second job must not affect the employee's standard company workday, interfere or conflict with regular duties, raise any ethical concerns or necessitate long hours that may affect work performance. Employees must notify the company, in writing, of all outside business interests and employment activities and any future changes in such activities. Employees are expected to avoid any conflict of interest and to immediately report to management any such conflict if it occurs.

**POLITICAL ACTIVITY:** Scripps remains independent in all political matters and will not make monetary contributions, directly or indirectly, to political campaigns or causes or to political parties. The company's officers and senior managers will not make such contributions on behalf of Scripps. Rare exceptions may be made to this prohibition, but only if permitted by law and approved by the president and chief executive officer of Scripps.

Although Scripps is independent in all political matters, employees are encouraged to register and vote.

Employees may pursue their own personal political activities, but may not, inadvertently or intentionally, represent personal views or contributions to be those of the company. Employees must avoid any suggestion that their relationship with the company constitutes an endorsement of any kind.

Journalists and others who are involved in news decisions or policies, or who work in the newsroom, must adhere to a more restrictive standard, given the neutrality from which news organizations must work. Scripps journalists are prohibited from serving in elected or politically appointed positions. They must not participate in political fund-raising, political organizing or other activities designed to enhance a candidate, political party or political-interest organization. They must not make contributions to political campaigns or engage in other such activity that might associate their names with a political candidate or political cause. If a Scripps journalist or any immediate family member is engaging in political activities, the journalist is required to notify his or her supervisor. Depending on the journalist's job duties, the company will determine whether a temporary reassignment is warranted.

**REQUESTS FOR INFORMATION/PUBLIC DISCUSSION:** Requests for information relating to Scripps should be referred to the Corporate Communications and Investor Relations Department. Additionally, press releases prepared by company employees should be reviewed by the corporate communications department prior to dissemination if, when taken as a whole, the information contained therein could reasonably be expected to affect the price of company stock.

Any other requests for company information should be referred to the appropriate local or corporate department.

**Integrity:** Having integrity means consistently adhering to high standards of professional conduct. Our actions, words and silences should communicate accurately and truthfully. We should not mislead, be deceptive or blur the truth. We should act in a way that others feel safe speaking to us in confidence and truth.

**Examples of integrity in our work with each other:**

- Accurate accounting and recordkeeping.
- Admitting mistakes and errors fully and promptly.
- Proper use of company funds and assets.
- Truthful and credible journalism.
- Willingness to accept feedback openly.

**Examples of integrity in our work with those we serve:**

- Appropriate representation of commercial messages and products.
- Compliance with laws and company regulations.
- Accurate and truthful news reporting. (Citing sources accurately, protecting sources, remaining objective and balanced.)
- Timely and accurate reporting of material information to shareholders.
- Truthful and accurate network programming.

**POLICIES TO GUIDE OUR WORK**

**ACCOUNTING AND RECORDKEEPING:** Accuracy and reliability in the preparation of business records is required by law and is critical to good decision-making. Officers, executives and employees are required to record and report information accurately and honestly in accordance with generally accepted accounting principles (GAAP). The company's financial records are subject to review. Employees are expected to cooperate fully with internal and external auditors.

**CONFLICT OF INTEREST:** Employees should avoid situations in which they are advancing or perceived as advancing personal interests at the expense of the company. Additionally, employees in management positions should not employ or supervise immediate family in their direct line of authority.

Immediate family is defined as spouse, domestic partner, parent, parent-in-law, legal guardian, child, brother, sister, brother-in-law or sister-in-law, grandparent, grandchild, aunt, uncle, cousin or any individual who may reside in an employee's immediate household or who may be considered a significant other. "Step" relationships (such as stepparent, stepsibling and stepchild) are considered immediate family under this policy.

**DATA SECURITY:** Information is a corporate asset and it must be protected from unauthorized modification, destruction or disclosure, whether accidental or intentional. Passwords must be kept confidential and secure and must not be shared with or disclosed to anyone.

**E-MAIL AND VOICE MAIL:** The company's e-mail and voice mail systems are intended to facilitate business-related communications and are considered company property. These systems are not considered private or confidential. While limited personal use of these communication tools is not prohibited, they should be used in an appropriate and productive manner. They may not be used for personal business ventures. The rule-of-thumb is that employees should not say or write anything that they wouldn't want someone other than the intended receiver to hear or read. Remember, even deleted e-mail or voice mail messages can be retrieved. For more information about the company's e-mail, voice mail and Internet usage policies, see the employee handbook.

**INSIDER TRADING:** Employees often have access to confidential information that, if or when it is made public, could affect the value of the company's publicly traded stock. It is strictly forbidden to use that confidential information, or provide it to others, to profit from a change in value of the company's stock. Violations are criminally punishable under federal and state securities laws.

If employees are in possession of material non-public information regarding the company, they may not trade directly or indirectly in the company's securities. They also may not disclose, intentionally or unintentionally, any material information that might advertently or inadvertently lead to disclosure of that information. Material information is any information that an investor would consider important in deciding to buy, hold, or sell securities of the company. In short, any information that could reasonably affect the price of the company's stock is material. Examples of matters that may be material include, but are not limited to, earnings forecasts, preliminary financial results, possible acquisitions, dispositions or joint ventures, the acquisition or loss of a significant contract, dividend actions and stock splits, important product developments, significant financing developments and the status of labor negotiations.

**THE INTERNET:** While the company permits limited personal use of the Internet, employees are expected to use it in an appropriate and productive manner. Creating, accessing or forwarding inappropriate content via the Internet is prohibited. As is the case with the company's e-mail and voice mail systems, the Internet should not be used for personal business ventures while at work.

**PERSONAL COMPUTER SOFTWARE:** Only software approved, licensed or owned by Scripps may be used on its computers. Employees should not use or install their own software on the company's computers. Employees may not copy, reproduce or take home any software or documentation owned or licensed by Scripps without prior approval of their supervisor. To do so may violate the company's license agreements and copyright laws.

**PERSONAL USE OF COMPANY ASSETS:** Employees are not permitted to use or employ, or allow others to use or employ, Scripps materials, supplies, equipment, funds or co-workers for personal purposes. Exceptions must be approved by management.

**PLAGIARISM:** The work of another person may not be submitted without complete attribution of the true source. Failure to do so constitutes a fundamental breach of journalistic ethics.

**PROTECTING CONFIDENTIAL INFORMATION:** Employees may have access to information about the company that is either competitively sensitive or needs to be held in confidence until a public announcement is made. To protect such confidential information, and to comply with securities regulations, employees must exercise the utmost care to avoid inadvertent disclosure through public or casual discussion, which could be overheard or misinterpreted.

News employees may obtain confidential information about the company, which is given to them based on their relationship as employees and not based on their roles as journalists. In such cases, news employees must honor the company's need for confidentiality until such time as the company publicly releases the information.

**WORK PRODUCT:** All work produced in the ordinary course of one's employment belongs to Scripps. It may not be used or distributed without prior written authorization by management.



**Respect** means valuing the innate worth of others as human beings regardless of their differing points of view or lifestyles. Having respect does not require us to completely agree with or condone the opinions and actions of others. Rather, it is an ability to recognize the freedom each of us has to be individuals.

**Examples of respect in our work with each other:**

- Being polite and courteous.
- Cooperating with one another; developing a sense of teamwork.
- Forgiving one another.
- Listening to and treating others without prejudice or judgment.
- Maintaining a safe and respectful working environment.
- Trying to understand the needs of others.

**Examples of respect in our work with those we serve:**

- Awareness of and sensitivity to society's wide variety of beliefs and cultures.
- Fulfilling our mission to educate, inform and encourage public discussion on significant community issues.
- Timely and transparent financial reporting to shareholders.

**POLICIES TO GUIDE OUR WORK**

**ANTI-HARASSMENT:** Scripps strives to maintain a workplace that fosters respect and promotes harmonious, productive working relationships. Therefore, the company prohibits unlawful harassment of its employees in any form, including harassment based on race, sex, sexual orientation, color, religion, age, disability, national origin or on any other basis prohibited by local, state or federal law. For more information on the company's Anti-Harassment Policy, see the employee handbook.

**SAFETY, HEALTH AND ENVIRONMENT:** Scripps intends to provide safe operating procedures, to promote the health of its employees, and to care for and encourage regard for the environment among co-workers and in the community.

## Values as Strategic Priorities

Taken together, the pursuit of these values yields some important strategic priorities for Scripps.

These include:

- Diversifying our workforce to reflect the communities and audiences we serve.
- Encouraging principled decisions that help us uphold our company values and mission.
- Providing adequate resources to employees.
- Recognizing employees who apply our values in their daily decisions.
- Serving our communities.

We encourage you to consider how our ethical and strategic commitments build on each other and to look for ways to strengthen those connections. If you have ideas for strengthening the company's commitment to ethical business practices, contact your supervisor or the corporate ethics program director (see page 18).

## Ethical Decision Making

All employees encounter ethical challenges in their work. This code is intended to help you recognize and resolve those challenges. We suggest the following process in identifying and finding appropriate resolutions to ethical challenges.

When considering any business problem, you should always ask yourself these four questions:

- 1** Are there laws and/or regulations that apply to this situation?
- 2** Are there Scripps policies and/or procedures that apply to this situation?
- 3** Do Scripps core values apply to this situation?
- 4** Does my own sense of the "right thing to do" apply here?

Answering "yes" to any of these four questions suggests that there is an ethical issue and that the ethical issue should be considered when addressing the problem.

When considering a solution to such a business problem, ask yourself these seven questions:

- 1** Is your solution legal and ethical?
- 2** Who will be affected by this solution?
- 3** How will they be affected?
- 4** Is there a good business case for this solution?
- 5** Is this solution consistent with how Scripps defines the "right thing to do"?
- 6** Is this solution consistent with how I define the "right thing to do"?
- 7** Will the company's reputation and standing in the community be affected by this solution?

The answers to these questions help determine if the solution is consistent with the company's ethical standards, with society's standards for ethical conduct in general and with you, the decision maker, in particular.

## Seeking Guidance

You are encouraged to seek guidance whenever you encounter a situation where the ethical standards described in this code are unclear or ambiguous.

In most cases the appropriate source of guidance would be your immediate supervisor.

There may be cases in which your supervisor is the cause of the uncertainty or when approaching your supervisor might feel uncomfortable or unsafe. In those instances there are several other appropriate alternatives:

- Another manager in your direct line of reporting.
- Your local or corporate Human Resources Department.
- The corporate ethics program director (see page 18).
- The Corporate Legal Office.
- Any senior manager or member of the executive staff.

In keeping with the spirit of this code, we are committed to promptly addressing any concerns that are brought to our attention and encourage you to utilize any of the options listed above. You may also report any concern to the company's Ethics Line. For details on how to use the company's Ethics Line, see page 18.

## Enforcement of Company Standards

The standards referred to throughout this code, and further explained in the employee handbook and other documents, represent the formal position of Scripps and as such are enforceable. Employees are expected to conform to these standards at all times. If standards are violated, employees will be subject to disciplinary action that could, in the most serious circumstances, include termination of employment.

# Ethics Management at Scripps

Scripps takes its ethical obligations seriously, especially the obligation to provide employees with the guidance and support needed to ensure that we all make the best, most ethical choices in our work.

To support that commitment Scripps has created the following systems and structures.

**THE E.W. SCRIPPS COMPANY CODE OF ETHICS: KEEPING THE PUBLIC TRUST:** Every employee is entitled to a clear and concise description of the company's ethical commitments and expectations. This code is an important part of meeting that commitment.

**THE CORPORATE ETHICS PROGRAM DIRECTOR:** Scripps has designated a corporate ethics program director who is responsible for the implementation, oversight and continuous improvement of the company's ethics program. This high-level manager is the key person to ensure that Scripps meets its legal and ethical obligations and to communicate that commitment to all employees and the board of directors. The ethics program director can be reached at 513-977-3899.

**THE ETHICS LINE:** Scripps has established a safe and effective process for reporting observed or suspected ethical misconduct. Reporting may be anonymous. All reports are confidential within the limits of the law. Scripps guarantees that there will be no retaliation or retribution from the company or any of its agents against an employee reporting ethics concerns.

Scripps has retained EthicsPoint, an independent firm that offers telephone and Web-based reporting of ethical concerns by Scripps employees. When you call the toll-free Scripps Ethics Line at 888-397-4911, a trained professional of EthicsPoint will answer your call. This confidential telephone ethics line provides support in more than 120 languages. If you prefer, you can log your concern via the Internet by accessing **www.ethicspoint.com**. All Web reports are encrypted for anonymity. The telephone ethics line and Web site are available 24 hours a day, seven days a week.

EthicsPoint accepts, logs and reports concerns to Scripps management who will investigate and resolve any ethics concerns or complaints. You will be provided with a "report key" and will be able to choose a confidential password so that you can return to EthicsPoint through the telephone ethics line or Web site in six business days. By returning in six business days, you will have an opportunity to review any follow-up questions or submit more information about your concern or complaint.

# Acknowledgment

I acknowledge that I have received a copy of *The E.W. Scripps Company Code of Ethics: Keeping the Public Trust* and that I have read and understand its content.

I understand that this acknowledgment form does not represent an employment contract between Scripps and myself and does not guarantee any right of employment. If covered by a collective bargaining agreement, I understand that the provisions of the collective bargaining agreement continue to apply to my employment.

I understand that this signed acknowledgment will be maintained in my personnel folder in the Human Resources Department and that I will be provided with a copy of this form upon request.

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Employee Signature

---

Date

---

Printed Name

---

Title

---

Operating Unit

---

City, State

**PLEASE TEAR FORM ALONG PERFORATION AND RETURN TO PROPER DESIGNEE.**



**INVESTIGATION OF ALLEGATIONS OF ETHICAL MISCONDUCT:** Allegations of ethical misconduct are taken seriously. Investigations of alleged misconduct are conducted internally. The intent of the investigation is to determine if there has been a violation of law, regulation, policy or procedure.

Investigations are conducted with three priorities in mind:

- 1** Protecting the rights of anyone reporting observed or suspected misconduct;
- 2** Protecting the rights of anyone accused of misconduct; and,
- 3** Eliminating the misconduct and, when appropriate, taking disciplinary action.

Employees should never undertake an investigation on their own. Always refer misconduct to the Ethics Line or to an appropriate member of management.

Employees reporting misconduct can learn of actions taken by the company either by accessing the confidential online report or by discussing the situation with an EthicsPoint representative or a member of Scripps management.

**IF YOU:**

- Are not sure what you have observed is ethical misconduct;
- Are uncertain of the ethical thing to do in any given situation; or
- Have knowledge of or have observed ethical misconduct:

Call 888-397-4911  
or visit [www.ethicspoint.com](http://www.ethicspoint.com)

**PROGRAM ENFORCEMENT:** The standards described in each of the foregoing sections will be consistently enforced. Any employee who violates these policies may be subject to a full range of disciplinary measures, including suspension or termination, responsibility for financial damages and possible criminal prosecution.

Questions about the interpretation or administration of these guidelines, or about the investigation and enforcement procedures should be referred to the ethics program director at 513-977-3899.

The ethics program director will monitor the effectiveness of the Ethics Program on a periodic basis.



THE E. W. SCRIPPS  
COMPANY

P.O. Box 5380  
Cincinnati, Ohio 45201  
[www.scripps.com](http://www.scripps.com)

**Ethics Line**

[www.ethicspoint.com](http://www.ethicspoint.com)  
888-397-4911