



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





A MESSAGE FROM JOHN DYER

Dear Cox Employee:

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

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

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

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

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

Sincerely,

John Dyer
President and CEO
Cox Enterprises



WE FOLLOW THE LAW (CONTINUED)

ANTI-BRIBERY LAWS

We conduct business with integrity. Never offer, make or authorize a payment or anything of value to influence a business decision. Acts of bribery and corruption are simply not part of the way we do business.

DID YOU KNOW?

**“ANYTHING OF VALUE”
DOESN’T JUST MEAN CASH.**

It could be stock, a gift certificate, a favor, a loan, any kind of home improvement, a job, a kickback, a discount, an offer of entertainment or travel. Even a charitable or political contribution could be considered a bribe under certain circumstances.

EXPLORE OUR POLICIES

- > Foreign Corrupt Practices Act & Anti-Corruption Policy



LIVE IT

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

**DON'T TRADE BASED ON
“INSIDE” INFORMATION.**

INSIDER TRADING LAWS

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

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

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

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WE ARE GOOD NEIGHBORS

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

 **FIND OUT**

- > [How We Partner With Our Communities](#)
- > [About Charitable Activities](#)
- > [About Our Policy on Political Activity and Lobbying](#)
- > [How We Honor Our Environmental Responsibility](#)
- > [About Our Commitment to Human Rights](#)