CODE OF EXCELLENCE
Dear Cox employees,

Our company’s foundation is built on strong ethical principles and values, which reflects our commitment to conducting our business with honesty, fairness and integrity. Throughout the business community, Cox Communications, Inc. is uniformly regarded as a company with an outstanding reputation because we are committed to standards of conduct that exceed the expectations of our employees, customers and the communities we serve.

Cox’s Code of Excellence ("Code") reflects our commitment to doing business the right way. The Code applies to all of us, including employees, board members, directors and officers alike. Each of us is responsible for making the right choices in our daily business activities. Our Code is our guide to ensure that all of us maintain the necessary values and the standards our business requires.

I encourage you to read and understand our Code and to know where to go for help if a situation arises. Clearly, no code of conduct can spell out the appropriate behavior for every situation. However, if you have questions about a situation or discover activities that you think may violate our Code, you have an obligation to speak up. No one will be retaliated against for asking questions or speaking up about activities they in good faith believe are illegal, unethical or may violate our Code.

Cox has a tradition of honest and ethical conduct and we are all responsible for ensuring that this tradition continues. Thank you for being a part of the Cox family and for your commitment to strong ethical business practices.

Sincerely,

Pat Esser
President
Cox Communications, Inc.
WE HONOR OUR RESPONSIBILITIES

We're passionate about our company. That's why we don't just have a "Code," we have a "Code of Excellence." No matter what job we do or where we do it, we're committed to the highest standards of business conduct.

FIND OUT
- About Your Responsibilities
- How to Share Concerns
- How We Don't Tolerate Retaliation
- About People Leaders' Responsibilities

The Ethics Line is accessible by phone or Web and allows you (anonymously, if you wish) to ask questions or share your concerns 24 hours a day, 7 days a week with an independent, third-party interview specialist.

ETHICS LINE: 1-877-329-0696
www.CoxEthicsLine.EthicsPoint.com

When you contact the Ethics Line, the information you provide is documented in detail and forwarded to the appropriate office within Cox for investigation and resolution. No matter who you contact or what resource you choose, your concern will be promptly addressed and handled with the appropriate level of confidentiality. Keep in mind, it may not be appropriate for the results of an investigation to be communicated back to you in light of our obligation to protect privacy and confidentiality, but you will have the ability to know whether the review or investigation has been closed.

YOU CAN REPORT CONCERNS ABOUT:
• Discrimination or harassment
• Conflicts of interest
• Theft, fraud or bribery
• Environmental or safety issues
• Inappropriate gifts or entertainment
• Accounting or financial issues
• Code violations
• Policy violations
• Retaliation

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.

DID YOU KNOW?
EXPLORE OUR POLICIES
- Ethics Line Reporting Policy
- Open-Door Reporting Policy
- Anti-Retaliation Policy
- Code of Excellence Policy
- Anti-Bribery and Anti-Corruption Policy
- Environmental, Health and Safety Policy
- Data Privacy and Security Policy
- Code of Conduct Policy
- Whistleblower Policy

You can report concerns about:
• Ethics Line
• Open Door Reporting
• Anti-Retaliation
• Code of Conduct
• Code of Ethics

See something? Say something. Speak up.
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WE ARE GUIDED BY OUR VALUES

OUR PURPOSE
Delivering life’s most important connections

OUR VISION
To be the most trusted provider of communication and entertainment services in America

OUR VALUES

INTEGRITY
We do business with honesty and integrity. We meet or exceed the highest ethical standards in all of our business activities. We can be trusted to do what we say we will do. We live Cox Values.

PEOPLE
Our employees are our most important resource. They set us apart. We invest in their continuous development and recognize their contributions to our success. We count on employees to do the right thing.

DIVERSITY
Diversity of cultures and ideas makes us stronger. We value diverse approaches, thinking, perspectives and people.

CUSTOMERS
Our customers depend on us to provide reliable, quality products and outstanding service at every opportunity.

COMMUNITY
Communities connect us to the people we serve. We are leaders and responsible citizens in the communities where we live and work. At the heart of our Values, we support youth, education and environmental sustainability.

TECHNOLOGY
Technology is a key component of our business and our customers expect our network to be best-in-class for the services they enjoy. Innovation of our products and services is designed to benefit our customers and to connect them to the things they care about.
Our Code is our cornerstone – the foundation on which our commitment to excellence is built. It provides information and answers to help us model our core values and set the standard for doing the right thing when acting on behalf of Cox.

FIND OUT

> Why We Have a Code
> Who Has to Follow It
> How to Make Ethical Decisions
> What Happens When Our Code Is Violated
WHY A CODE?

Because we want you to find the answers you need to do your job lawfully and ethically.

Our Code provides an overview of the laws, regulations and company policies that affect our business as well as some resources we can reach out to for help. It doesn’t just tell us how to work, but how to embrace our values in every business decision and action we take.

So what does that mean?

It means doing things the right way. Making decisions guided by integrity and ethics. It’s about keeping our promises. Honoring our values. Doing business as a trusted partner, the way we’ve done it for more than half a century.

WHO HAS TO FOLLOW IT?

As an employee of Cox, each of us has a responsibility to know and follow our Code and to ask questions about issues that are unclear. We also have a responsibility to communicate with each other and our partners about the standards we’ve put in place to ensure our company is one of the best to work for and with.

BE EXCELLENT!

READ THE CODE.

LIVE THE CODE.
ETHICAL DECISION-MAKING

Remember, our Code is the starting point, not the finish line. It lays out the basic rules for how we do things but it doesn’t have the answer to every question you might have or every situation you might face.

NOT SURE OF WHAT TO DO?
ASK YOURSELF:

IS IT LEGAL?

DOES IT COMPLY WITH OUR CODE OR POLICIES?

IS IT GOOD FOR COX AND RESPECTFUL OF MY CO-WORKERS?

WOULD I FEEL GOOD ABOUT IT IF IT WAS PUBLISHED ONLINE OR BROADCAST IN THE NEWS?

THE ACTION IS PROBABLY OKAY. STILL NOT SURE? ASK FOR HELP.
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.

Anyone who violates our Code, our policies, regulations or the law (or fails to report a violation) is not doing the right thing and may face corrective action, up to and including separation or additional training.

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 internal or governmental investigation.

EXPLORE OUR POLICIES

> Corrective Action Policy
> Doing Business Right Policy

BE EXCELLENT!

PRESERVE AN ETHICAL COX.

DO YOUR PART - SPEAK UP.
We’re passionate about our company. That’s why we don’t just have a “Code,” we have a “Code of Excellence.” No matter what job we do or where we do it, we’re committed to the highest standards of business conduct.
TOGETHER... WE PUT OUR VALUES INTO PRACTICE

Conduct business legally and ethically. Preserve the trust that others have placed in us. Be sure there’s no difference between what you say you will do and what you do.

Know the policies and procedures that apply to your job. Be aware that some markets, business groups or departments have policies that apply only to employees in their area.

Complete your mandatory training. It will help you in not only knowing our policies and procedures, but also applying them to your everyday work.

Use the Code. Re-visit Code features to keep issues top-of-mind.

Ask questions. It’s the best way to be certain you’re on the right path. Always remember: there are people who want to help you.

Take action. If you see or suspect a violation of our Code, say something. Speaking up isn’t just a good idea, it’s your duty and required by our Code. It helps make our company a better place to work.

WHAT IF...

THERE’S A CONFLICT BETWEEN THE CODE AND A POLICY IN MY DEPARTMENT?

Follow the Code. Bring the conflict to the attention of your supervisor and HR representative.
SHARE CONCERNS

Start with your supervisor. Our “Open-Door Reporting Policy” means you are free to talk to your supervisor any time about any concerns. If you’re not comfortable doing that, there are other resources available to help you.

The Ethics Line is accessible by phone or Web and allows you (anonymously, if you wish) to ask questions or share your concerns 24 hours a day, 7 days a week with an independent, third-party interview specialist.

ETHICS LINE:
www.CoxEthicsLine.EthicsPoint.com

When you contact the Ethics Line, the information you provide is documented in detail and forwarded to the appropriate office within Cox for investigation and resolution.

Our Law & Policy Department can also help you understand any requirements Cox has under the law.

No matter who you contact or what resource you choose, your concern will be promptly addressed and handled with the appropriate level of confidentiality. We take concerns very seriously. Keep in mind, it may not be appropriate for the results of an investigation to be communicated back to you in light of our obligation to protect privacy and confidentiality, but 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
- Conflicts of interest
- Theft, fraud or bribery
- Environmental or safety issues
- Inappropriate gifts or entertainment
- Accounting or financial issues
- Code violations
- Policy violations
- Retaliation

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.

EXPLORE OUR POLICIES

> Ethics Line Reporting Policy
> Open-Door Reporting Policy
> Anti-Retaliation Policy
NO RETALIATION HERE

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.

See our Anti-Retaliation Policy to learn more. If you think that you or someone you know has been retaliated against for raising an issue, Speak Up.

WHAT IF...

THE CONCERN I RAISE IS ABOUT MY SUPERVISOR — COULDN’T I LOSE MY JOB?

The best place to raise your concerns would typically be with your supervisor, but because it’s your supervisor’s conduct that concerns you, calling your HR representative or the Ethics Line are good options. You’ll speak to an interview specialist who doesn’t work for Cox, so you can have the assurance of knowing that the situation will be investigated. Retaliation by anyone, including your supervisor, will not be tolerated.

ARE YOU A PEOPLE LEADER?

You have a special responsibility to lead with integrity. Set a good example for your team and show them, through your everyday words and actions, that you do business honestly and in compliance with our Code.

Be the kind of leader who people feel comfortable approaching.

• Promote our Open-Door Reporting Policy.
• Support employees who come forward in good faith to share their concerns or raise questions.
• Listen, take good notes and work to resolve issues as quickly and effectively as possible.
• Seek Help if you’re not sure of the right way to go.
• Make sure employees aren’t subjected to retaliation for speaking up.

WHAT’S “GOOD FAITH”?

Honestly believing in what you’re doing. Sharing a concern “in good faith” means that you honestly believe that there’s a violation of law or our company policies and that you’re not deliberately making a false report.
WE PROMOTE AN INCLUSIVE WORKPLACE

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

FIND OUT

> About Our Diverse Workforce
> How We Work Toward a Harassment-Free Cox
WE CELEBRATE OUR DIVERSE WORKFORCE

Think about families. Although they may be alike in some ways, each member has a different way of looking at things, a different way of saying things, a different way of doing things. The Cox family is no different. While we’re all passionate about providing our customers with the very best experiences, each of us brings a different idea for powering that passion. It’s that diversity of backgrounds, of cultures and viewpoints that drives our success.

Our commitment to diversity is reflected in our everyday hiring and employment practices. It’s one of our values and a reason why Cox is a Top 50 Company for Diversity. You’re not like anyone else, and we’re glad about that.

We provide equal employment opportunity and don’t discriminate against anyone on the basis of race, color, religion, gender, sexual orientation, gender identity or expression, age, national origin, citizenship status, marital status, disability, genetic information, status as a protected veteran by federal law, or any other legally protected category.

EXPLORE OUR POLICIES
> Equal Employment Opportunity Policy
> Anti-Harassment Policy
> Anti-Retaliation Policy

DID YOU KNOW?

OUR EQUAL EMPLOYMENT OPPORTUNITY POLICY APPLIES TO ALL ASPECTS OF EMPLOYMENT INCLUDING THINGS LIKE:

- Getting a job at Cox
- Performance evaluations
- Promotions and advancement
- Pay and fringe benefits
- Discipline and separation

BE EXCELLENT!

HONOR THE INDIVIDUAL EXPERIENCES, CULTURES AND PERSPECTIVES OF EVERYONE ON THE COX TEAM.

THINK ABOUT HOW YOUR WORDS AND ACTIONS ARE PERCEIVED BY OTHERS.

LIVE OUR VALUES.
WE RESPECT EACH OTHER

We care about each other and work together to promote a harassment-free Cox. We don’t tolerate any behavior (whether verbal, visual, physical or sexual) that would create an offensive, hostile or intimidating environment.

As part of our commitment to respect, we also provide reasonable accommodations to employees and applicants with disabilities or based on religious beliefs. Discuss any request for accommodation with your manager or local HR representative.

EXAMPLES OF HARASSMENT

- Joking about someone’s ethnic background
- Unwelcome hugging or touching
- Discussing sexual activities or desires or displaying obscene pictures, cartoons or posters
- Posting or circulating via email materials that degrade or express hate against someone because of gender

EXPLORE OUR POLICIES

> Anti-Harassment Policy
> Ethics Line Reporting Policy
> Open-Door Reporting Policy
> Anti-Retaliation Policy

WHAT IF...

SOMEONE JUST DOESN’T LIKE YOU — IS THAT UNLAWFUL HARASSMENT?

No, harassment laws address conduct that’s based on legally protected categories. But even though it’s not a legal issue, it’s still an issue.

BE EXCELLENT!

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 CONDUCT BUSINESS LAWFULLY

We operate in an industry that’s highly regulated, so 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.
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 that we will respect their personal information, so that each of us can focus on providing the best service to our customers and website visitors.

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. The value generated by our use of personal information must clearly meet a responsible business need.

We:
• Collect only the personal information that we need.
• Are open and honest about how we collect, use and disclose personal information.
• Provide appropriate choice and access regarding personal information.
• Take reasonable steps to keep personal information secure.
• Properly destroy any personal information we have that is no longer needed for business purposes.
• Notify our customers and employees promptly if their personal information has been compromised.
• Comply with all policies, processes and guidelines to protect the security of customer and employee 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.

EXPLORE OUR POLICIES

> Privacy Principles
WE FOLLOW THE LAW

We’re subject to many laws and regulations.

ANTITRUST AND COMPETITION LAWS

We comply with laws called antitrust laws that are designed to promote a thriving marketplace with free, fair and open competition.

Never take advantage of anyone by lying or manipulating information, and never make false, misleading or disrespectful comments about our competitors or their products or services.

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 the Chief Compliance Officer immediately.

Do:

• Be up-front and honest in your business dealings and promote positive business relationships everywhere we operate.
• Sell our products and services on the basis of their great quality and performance.
• Avoid even the appearance of anything that could suggest something unfair or deceptive.
• Seek help from the Law & Policy Department for questions about any law or regulation.

Don’t communicate with our competitors about:

• “Fixing” prices (for example, setting minimum or maximum prices).
• “Fixing” terms (for example agreeing on pricing formulas, credit terms, etc.).
• Dividing up markets, customers or territories.
• Preventing another company from entering the market.
• Interfering with the competitive bidding process.
• Stealing trade secrets.

EXPLORE OUR POLICIES

> Antitrust Policy

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 the Chief Compliance Officer.
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.

BE EXCELLENT!

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 may bring you into contact with material, nonpublic information or “inside” information about 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.
WE UNDERSTAND OUR RESPONSIBILITY TO OTHERS

It’s important to be a good partner, we get that, so, we do the things we need to do to honor the relationships we’ve built with others inside and outside of Cox.

FIND OUT

> How We Promote Safety
> About Our Commitment to Our Customers
> How We Work with Suppliers
> How We Work with the Government
> How We Respect our Competitors
WE UNDERSTAND OUR RESPONSIBILITY TO OTHERS

WE MAINTAIN A SAFE AND HEALTHY WORKPLACE

We’re committed to providing you (and anyone else lawfully on our property) with a safe and secure workplace.

Do your part:
• Be proactive in promoting your own health and safety.
• Follow our policies and procedures.
• Be alert to safety risks and only undertake work you’re trained to do.

Safe and secure also means violence-free. We don’t tolerate:
• Threats of any kind
• Intimidation
• Violence

Possession of a weapon of any kind on Cox property, including parking lots (except where specifically permitted by law), at a customer’s home or premises, while engaged in an activity for Cox, or at a Cox-sponsored event, is prohibited unless approved by the appropriate company officer.

If your job involves operating a company vehicle or using your own vehicle to conduct company business:
• Know and follow our Driving Policy.
• Observe safe driving practices.
• Remember that reading text messages or emails while driving is strictly prohibited.

We protect people in everything we do. If you experience or witness an accident, injury, illness or unsafe condition, report it right away to your supervisor or local HR representative.

Drugs and alcohol can not only affect your ability to perform at your best, but also put you and others at risk. That's why we strictly forbid abuse or use of drugs or alcohol in the workplace or while operating company equipment. If you suspect drug or alcohol abuse in the workplace, Speak Up.

Our confidential Employee Assistance Program (EAP) is available to help you and your family members resolve personal, family or work-related problems.

Explores Our Policies
> Workplace Safety Policy
> Drug and Alcohol Usage and Testing Policy
> Conduct at Business and Company-Sponsored Events
> Driving Policy for Cox Vehicles

WHAT IF...
THERE'S SOMETHING I CAN DO TO SAVE SOME 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.
WE UNDERSTAND OUR RESPONSIBILITY TO OTHERS

WE HONOR THE PROMISES WE MAKE TO 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 information (see We Respect the Privacy of Others).
WE UNDERSTAND OUR RESPONSIBILITY TO OTHERS

WE CONDUCT BUSINESS HONESTLY AND ETHICALLY...

...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 and Cox’s best interests.

We expect suppliers to respect and protect our confidential information and, in return, we respect and protect theirs.

...WITH THE GOVERNMENT

We’re 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 COMPETITORS

It’s okay to gather information about our competitors and their customers, suppliers and vendors, but we need to do it legally and ethically. Use good judgment. Gather information from public sources and customer feedback. Don’t do anything you shouldn’t, and don’t ask someone else to do something you’re not permitted to do yourself.

Sources of Information about Competitors?

Check public sources like...

• Published articles, ads, trade press accounts
• Trade shows and customer feedback
• Information publicly available on the Internet
• Industry surveys by reputable consultants

Using confidential information about our competitors from current or former employees is never okay. If you receive any competitor information that you think may be confidential or has been obtained inappropriately, contact the Chief Compliance Officer.

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.

EXPLORE OUR POLICIES

> Antitrust Policy
WE ACT IN THE BEST INTEREST OF COX

We’re loyal, and we follow the generations of loyal employees who came before us. We don’t engage in activities or relationships that could make it hard for us to impartially, objectively and effectively carry out our jobs.

FIND OUT
- How We Avoid Conflicts
- About Giving and Receiving Gifts
- About Speaking on Behalf of Cox
- About Responding to Government Requests
- About Our Social Media Policy
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 behalf of our Company, that puts you and Cox in an awkward position and can impact the job you do as an employee of Cox. A conflict of interest happens when what you do (or what your family members do) outside of Cox interferes with the job you do as an employee of Cox.

While it’s not possible to list every situation that could present a conflict, there are certain situations in which conflicts typically arise. You have an obligation to avoid even the appearance of a conflict.

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, Speak Up. Most conflicts can easily be avoided or addressed if promptly disclosed and properly managed.

EXPLORE OUR POLICIES
> Conflicts of Interest Policy
> Indemnification of Employees Serving on Outside Boards

WHAT KINDS OF SITUATIONS COULD PRESENT A CONFLICT?

A SECOND JOB
Work outside of Cox can pose a potential conflict if it competes with the work you do for Cox or interferes with the time and talent you bring to your job.

Doing work or serving as a consultant for one of our competitors, customers or suppliers could present a conflict.

PERSONAL RELATIONSHIPS
Business decisions can become difficult if the person with whom you are dealing is a friend or family member.

Selecting a friend or family member from the applicant pool for a job in your department or as a Cox vendor or supplier could be a conflict.

INVESTMENTS
A conflict can also arise if you or a family member holds a financial interest in (or exercises control over) one of our suppliers, customers or competitors.

Investing in a customer that you deal with as part of your job responsibilities at Cox could be a conflict.

OUTSIDE ACTIVITIES
Board directorships or advisory roles with companies, universities or other organizations may pose a conflict if decisions you make for them affect decisions you make for Cox.

It could be a conflict to serve on a Technical Advisory Board for a company that offers services similar to ours.

Membership on boards of industry associations generally doesn’t pose a conflict… but it can if the association takes a position that’s contrary to ours or those of our key customers. Refer to the Indemnification of Employees Serving on Outside Boards Policy before accepting a position on a board.

SUPERVISOR/EMPLOYEE RELATIONSHIPS
Romantic relationships can present divided loyalties.

Personal relationships can (or may appear to others to) affect an employee’s objective decision-making.
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 someone to be objective about the person or the company that provides them.

Seek Help if you’re not sure about what’s okay when it comes to giving and receiving gifts. Avoid doing anything that might compromise (or appear to compromise) the decisions you make as an employee of Cox. Anything you give or get that’s valued at more than $250 must be reported on a Gift & Entertainment Disclosure Form and approved by your department manager. Keep in mind, even if something is offered to you as “free,” it still has a value associated with it and must be reported.

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

BE EXCELLENT!

KNOW AND FOLLOW THE RULES FOR GIFT-GIVING AND GIFT-GETTING.

DON’T GIVE ANYTHING OF VALUE TO A GOVERNMENT EMPLOYEE WITHOUT ADVANCE APPROVAL.

EXPLORE OUR POLICIES

> Conflicts of Interest Policy
> Political Contributions Policy
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 that information that’s communicated about Cox is reliable, consistent and accurate.

Contacted by:
- The media?
- A user group?
- A member of the national consumer or trade press?
- Someone in the financial community?
- An industry/research analyst?

Unless you’re authorized to handle media relations, don’t speak on behalf of Cox if contacted by the media.

Even if you know the answer, even if the caller says it’s “off-the-record,” even if you think you’re doing the right thing, refrain. 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 or participate in a joint press release with one of Cox’s vendors?

Always check first with your manager and Public Affairs. You’ll need to submit the External Speaking Engagement Registration Form and get approval in advance before you may accept 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 the Law & Policy Department 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 office, don’t say it, write it or share it online.

Other rules of the (social media) road:
- Use good judgment and be respectful of others.
- Protect personal information. Don’t disclose anything that could violate employee or customer privacy.
- Protect Cox confidential information. Don’t disclose anything that could harm Cox’s business interests.
- Comply with laws that protect people, privacy, copyrights and confidentiality.

Again, unless you’re authorized to speak on Cox’s 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. 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 Public Affairs.

EXPLORE OUR POLICIES
- Social Media Policy
- Social Media Rules of the Road
- External Speaking Engagement Registration Form
- Public Affairs Self-Serve Communications Toolkit
WE SAFEGUARD OUR COMPANY’S ASSETS

We’re good stewards of our campus and plant as well as everything on it and in it. From information assets like the intellectual property we create to physical assets like the vehicles we drive and the computers we use, we take care of what’s ours.

FIND OUT

> About Protecting Physical Assets and Technology
> How to Protect Our Information
> How We Watch Over Our Brand
> About Accuracy in Recordkeeping
> How to Maintain and Manage Our Records
WE PROTECT OUR ASSETS

Just about everything we use to do our jobs every day would be considered company assets, and each of us is responsible for protecting them from theft, loss, waste or abuse. By protecting our assets, we’re protecting our competitive advantage in the industry.

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

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 RE-SET 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.

In general, you shouldn’t use Cox’s assets for your personal activities. Occasional personal use of things like email, Internet access, phone and fax machines is okay as long as it:

- Really is occasional.
- Doesn’t interfere with your work (or anyone else’s).
- Doesn’t violate the law or our policies.
- Doesn’t cost Cox anything.
- Isn’t for personal gain or political purposes.

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 electronic systems.

You can help us protect our systems from viruses and downtime.

Do:

- Keep passwords and PIN numbers in a secure place and don’t share them with anyone.
- Ensure the physical security of information or hardware assigned to you.

Don’t:

- Install unauthorized software, applications, hardware or storage devices on your computer.
- Access our network through unauthorized applications or devices.
- Download music files.
- Use unlicensed software (it’s illegal).
- Make copies of software, associated manuals or other materials to use at home or for someone else to use.
- Put software on a local area network (LAN) for use by others.
WE PROTECT OUR ASSETS (CONTINUED)

Information Assets. Information is woven into every aspect of our business. Protecting it is a critical responsibility.

We own:

• Proprietary information – things that are unique to Cox like ideas, strategies, processes and other business ideas.
• Intellectual property – our knowledge base, which includes trademarks, patents, copyrights and trade secrets. (Visit the Intellectual Property Intranet Site to learn more.)
• Sensitive information about our company – reports, spreadsheets, financial information. Be sure you understand our three information classification categories (highly confidential, confidential and internal use only) and follow the rules and requirements associated with each.

Treat all information with care and take precautions before disclosing it to anyone inside or outside of our company. Disclose it only to those who have both a right and need to know the information. For companies or individuals outside of Cox, obtain a signed non-disclosure agreement before providing access.

Limit the amount of information shared to only what is required, and make sure the person receiving the information understands any restrictions related to its use or dissemination.

Take precautions:

• Don’t share confidential information with friends, family, relatives or the media.
• Don’t leave it unprotected on your desk, on white boards or in meetings.
• Don’t discuss it in public places where others could hear you.

If you come to Cox from another company, honor the promise and obligations you have made to protect that company’s confidential information. And if you leave Cox, don’t share our information with your new employer (refer to our non-disclosure agreement).

The Cox Name. 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.

As a company, we don’t tolerate retaliation against anyone who speaks up, in good faith, about misconduct.

WHAT’S A “WORK FOR HIRE”?

Any idea, invention, discovery, development, concept, idea 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.

EXPLORE OUR POLICIES

> Intellectual Property Agreement
> Intellectual Property Policy
> Enterprise Information Security Standards & Policy
> Information Classification and Protection Policy
> Electronic Information Systems Policy
> Cox Employee-Online Behavior Policy
> Mobile Communication Device and Usage Policy
> Non-Disclosure Agreement
> Cox Brand Standards
> Anti-Retaliation Policy
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 recordkeeping 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 under our Signature and Spend Authorization Policy to sign the document.

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. As a company, we don’t tolerate retaliation against anyone who speaks up, in good faith.

**Timekeeping.** If you are required to record your time using either our automated time record system or a manual timesheet, be accurate and truthful. Speak up if, at any time, someone tells you to under- or over-report your hours (or someone else’s hours) or asks you to conceal the dishonest timekeeping of others.

**Records Management.** Know and follow our Records Retention Policy. It helps us maintain the records we need to meet our legal, tax and regulatory requirements and provides information we need to securely dispose of records that are no longer needed. Take care never to dispose of information that may be relevant to current or threatened litigation or if you have received a litigation hold notice.

**EXPLORE OUR POLICIES**

> Accounting FP&A Policies
> Travel and Expense Policy
> Records Retention Policy
> Signature and Spend Authorization Policy
> Wage and Hour Compliance Policy
> P-Card Policy
> Strategic Sourcing and Procurement Standards
> Technology Sourcing & Procurement Guidelines

**WHAT IF...**

I DON’T WORK IN FINANCE OR ACCOUNTING?

You still have a responsibility to maintain the integrity of our recordkeeping. 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.
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
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 (visit Committed to Our Communities). As our President, Pat Esser, observed, we are “…in a powerful position to enhance life and learning.”

We encourage your personal involvement in the communities where you live and work, but when you contribute your own time or money to a charitable organization you care about, take care to make sure your activities are lawful and consistent with our policies. You shouldn’t use or donate Cox funds or assets for any activity outside of Cox unless you receive approval in advance.

Charitable Contributions. We make contributions that:

• Provide goodwill to organizations and causes in need.
• Strengthen the social, economic and educational infrastructure of our community.

All donations, whether monetary, media or otherwise, must be consistent with our goals and approved in advance.

Political Activities. We respect your right to engage in personal political activities, but again, you must do so on your own time, with your own resources. Don’t use Cox time, property or equipment for personal political activities without prior authorization from Government Affairs.

We are prohibited from making contributions as a company to any Federal candidates and will not reimburse any employee for making a campaign contribution to a federal, state or local candidate or other campaign committee, even if state and local laws permit it.

Lobbying. If your work involves contacts with legislators, regulators, executive branch officials (or their staffs), government contacts or efforts to influence legislative or administrative actions, make sure you follow all applicable disclosure rules. Discuss these activities with the Chief Compliance Officer or Government Affairs to determine if disclosure and other rules apply.

WHAT IF...

A FRIEND IS RUNNING FOR U.S. CONGRESS. CAN I HELP HER OUT WITH HER CAMPAIGN?

Perhaps. Your personal support is your personal business. You should complete a Conflict of Interest form in order to receive further instruction. And make sure you don’t use Cox assets to advance the campaign.

CoxPAC. Our company-sponsored political action committee accepts voluntary contributions from eligible employees to ensure that Cox has a voice with policy makers. 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.

For more information, see Cox Enterprises, Inc. (CEI)’s Political Campaign Do’s & Don’ts in CEI’s Corporate Responsibility section and the Political Activity and Lobbying Guidelines on our website.
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, customers, suppliers and partners.

In 2007, we launched Cox Conserves, our commitment to environmental sustainability. Cox Conserves focuses on reducing waste and energy consumption, as well as conserving water.

Cox Conserves goals:
- Send zero waste to landfill in the next 7-10 years.
- Become carbon and water neutral in the next 25-30 years.

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.

EXPLORE OUR POLICIES

> Political Contributions Policy
> Political Activity and Lobbying Guidelines
> CEI Political Campaign Do’s and Don’ts
> Cox Conserves
> Charitable Contributions Policy
> Universal and Hazardous Waste Policy

BE EXCELLENT!

REDUCE AND RECYCLE WHEREVER POSSIBLE AND REPORT ANY DANGEROUS OR HAZARDOUS ENVIRONMENTAL CONDITIONS.
CLOSING THOUGHTS
A Message from Our Chief Compliance Officer

Dear fellow Cox employee,

For more than 50 years, we have been guided by a simple belief, to do the right thing for our employees, our customers and our communities and do so lawfully.

Our culture and our values are the foundation of everything we do. It’s my responsibility as Chief Compliance Officer to work with you to ensure that our reputation is protected. My duties include helping you understand the laws and regulations applicable to our company and industry, as well as helping you understand the high ethical standards to which Cox holds us all.

Our Code of Excellence provides direction on ethical conduct and is a valuable source of information about our policies and guidelines to help you make the right choice. But our Code is more than just a description of our standards. It is the centerpiece of our Doing Business Right Ethics and Compliance program.

If you feel the need to talk about a situation, please contact your manager, your local Human Resources Management representative, or the Ethics Team at ethics@cox.com. You may also voice your concerns anonymously using our confidential Ethics Line via the Web at http://CoxEthicsLine.EthicsPoint.com. In addition, you may contact me directly at any time with questions or concerns regarding compliance with the Code of Excellence and Cox’s standards for integrity and ethics.

It’s our reputation, let’s all work together to protect it.

Sincerely,

Robin Sangston
Chief Compliance Officer
Cox Communications, Inc.
GLOSSARY

**Antitrust** - Antitrust laws are a combination of state and federal statutes, regulations and court decisions intended to protect free enterprise and encourage fair competition. They deal with agreements and practices that restrain free trade (for example, price fixing and boycotting). These laws also prohibit anti-competitive practices: pricing intended to drive a competitor out of business; harassment, misrepresentation or disparagement of a competitor or its products; theft of trade secrets; kickbacks and bribery.

**Assets** - Anything owned by a Company including physical property, technology, financial and information assets.

**Bribery** - Giving, offering to give, promising to give or authorizing to give anything of value to someone outside of Cox, for an improper purpose or to influence a business decision.

**Confidential** - Any information that is not Highly Confidential and which is considered critical to Cox's ongoing operations and could seriously impede or disrupt them if disclosed without authorization or made available to the public. This can include any information that is not Highly Confidential that contains personally identifiable information, audit reports, accounting information, business plans, etc.

**Conflict of interest** - Any situation, or appearance of a situation, where personal interests interfere with Cox's interests, or where we take for ourselves a benefit, opportunity or advantage that rightfully belongs to the company.

**Discrimination** - Treating an applicant or an employee less favorably because of his or her race, color, religion, gender, national origin, age, disability or other characteristic protected by law.

**Ethics** - A set of principles, beliefs and rules of behavior that define a culture and the way things are done. When we say an “ethical culture,” we mean the kind of workplace where honesty, fairness and respect are valued.

**Good faith** - Honestly believing in what you’re doing. Sharing a concern “in good faith” means that you honestly believe that there’s a violation of law or our company policies and that you’re not deliberately making a false report.

**Harassment** - Unwelcome behavior that’s based on race, color, religion, gender, national origin, age, disability or other characteristic protected by law.

**Highly confidential** - Any information for which the loss of confidentiality, integrity or availability could be expected to have an adverse effect on Cox, could provide access to business secrets and could jeopardize important interests or actions of Cox, could cause an individual harm if the information were to be misused and would require public disclosure or notification to the affected individuals. The highest levels of confidentiality and integrity are vital. This can include information such as social security or tax identification numbers, driver’s license or state issued identification numbers, financial or payment card information, personal health information, passwords, access codes, customer PINs, security keys, etc.

**Insider trading** - Using material, nonpublic (i.e., “inside”) information, or tipping someone else to use it, to buy or sell stock in a company.

**Integrity** - Honesty; an uncompromising adherence to high ethical standards.
**GLOSSARY (CONTINUED)**

**Internal information** - Any information that is not Highly Confidential or Confidential and that is not approved for general circulation outside Cox, where its unauthorized disclosure would inconvenience Cox, but is unlikely to result in significant financial loss or serious damage. This can include any information such as internal memos, policies and standards, internal project reports, minutes of meetings, unreleased press releases, unpublished marketing materials, competitive analysis, internal non-proprietary policies, processes or procedures.

**Legally protected categories** - Characteristics such as race, color, religion, gender, sexual orientation, gender identity or expression, age, national origin, citizenship status, marital status, disability, genetic information, status as a protected veteran by federal law, or any other characteristic protected by law.

**Material, nonpublic (or “inside”) information** - Information about a publicly-held company that hasn’t been widely disseminated to investors or to 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.

**Personal information** - Anything that can be used to identify a specific person, like a name, home address, email address, phone number, credit card number or birth date.

**PIN** - Personal Identification Number

**Retaliation** - An adverse action taken because an individual has reported a workplace concern or engaged in a protected concerted activity. Adverse actions include but are not limited to: dismissal from employment, demotion, loss of salary or benefits, involuntary transfer or reassignment, or denial of promotion that otherwise would have been received. Also prohibited are threats of retaliation or other discrimination directly related to the report made by the employee.

**Social media** - Forms of electronic communication through which a community of users create and share information, ideas and other content.

**Speaking engagement** - Includes speaking at industry events, professional associations, conference and other business gatherings or functions where you are speaking as a representative of Cox.

**Theft** - Taking something for yourself (e.g., money, equipment, technology, materials, supplies, etc.) that belongs to someone else.
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# CONTACTS

**Need help?** Start by talking to your manager, your supervisor or your local HR Representative. There are others who can help, too.

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