

SPECTRUM NETWORKS STANDARDS & PRACTICES

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I.

PURPOSE AND SCOPE

The primary purpose of Spectrum Networks is to cover the news that is essential to the local communities we serve. In covering those stories, we have to ensure that our mission to inform, educate, enlighten is accomplished fairly, responsibly, and honestly.

The reputation of Spectrum Networks rides on everything we do, every day of the week, every hour of the day. No set of guidelines, including these, can anticipate every situation that may arise. These Spectrum Networks Standards & Practices (the “Standards & Practices”) are thus intended to be an aid to common sense and sound judgment, not a substitute. They should not be understood as rigid rules, but instead as a guideline for integrity in newsgathering conduct.

Unless specifically stated otherwise, the Standards & Practices apply to every Spectrum Networks employee, contractor, freelancer, or any other individual doing work for Spectrum Networks (“Networks Staff”). Likewise, the Standards and Practices apply across all platforms which feature Spectrum Networks content.

II. CONFLICTS OF INTEREST AND IMPARTIALITY**A. Conflicts Of Interest – General Prohibition**

Networks Staff should never explicitly or implicitly use their position at Spectrum Networks for personal gain. As with all Charter employees, Networks Staff members are expected to avoid any conflict -- or even the appearance of a conflict -- between their personal interests and the best interests of Spectrum Networks and Charter. These standards are contained in Charter's Code of Conduct and in the Conflict of Interest Policy.

Industry Specific Conflict Rules ("Payola/Plugola")

The FCC has specific rules, known as the "Payola/Plugola" rules, which prohibit and provide stiff penalties for anyone who accepts something of value in connection with a story ("Payola") or anyone who uses a story to promote something that they have a financial interest in ("Plugola"). In order to avoid any of these issues and to ensure that Networks staff maintain the highest ethical standards, the following rules apply:

1. **Gifts** It is Spectrum Networks policy that Networks Staff may not accept anything of value which is intended, or which might reasonably appear to be intended, to compromise that person's news judgment, integrity, or impartiality. We apply here the FCC guidance that gifts with value under \$25 are generally not considered "valuable."
2. **Promotion** Without express permission from senior management, Networks Staff are also prohibited from promoting on Spectrum Networks (or even covering) any activity in which the Networks Staff member has direct or indirect financial or other personal interest.

Any Networks Staff member who becomes aware of any violations of the above rules should immediately contact anyone in senior management, the GVP of News Standards and Practices, Human Resources, and/or call Ethics Point, Charter's third-party ethics hotline.

B. Impartiality – Additional Requirements Specific To Networks and Staff As A Trusted News Organization

Even where there is no actual or apparent conflict of interest under Charter’s Code of Conduct, Networks Staff members are under a heightened obligation not to undertake outside activities, or engage in any conduct either on-the-job or outside of work that undermine the Networks hard-earned reputation for impartiality in gathering and reporting the news, in hosting public affairs shows and the like. This means that there are certain activities that other employees may engage in – participation in political campaigns or writing op-eds expressing strong personal political opinions, for example – that Networks Staff may not, at least not without discussion and express prior approval from senior news management. Observing these guidelines will help us maintain our reputation as a trusted news source, which is critical for our mission.

Below are a few specific areas where we expect Networks Staff to exercise good judgment. At all times, in and outside the office, online and off, our goal is to protect our audience’s trust and faith that we fairly deliver the news.

1. **Outside Political/Other Activities** Networks Staff are prohibited from any active participation in political campaigns. This includes campaigning for a candidate, contributing to a candidate or party, or a political action committee (“PAC”), participating at demonstrations and rallies, wearing campaign buttons or t-shirts (or any similar public display or expression supporting a campaign), or the like. In addition, Networks Staff may not serve on any outside board or committee or participate in other similar public activities that common sense dictates may become politically controversial and should avoid involvement in causes (e.g., police reform, gun control), including wearing buttons or t-shirts relating to such causes (or any similar public display or expression supporting such political causes), that may compromise, or may reasonably appear to compromise our ability to objectively report the news. Seek the advice of senior news management if you have any question about such outside activities. You should advise a member of senior news management if any immediate or other family member of yours becomes involved in a political campaign so that steps can be considered to avoid any potential conflicts of interest.
2. **Outside Political/Policy Opinion** Networks Staff should avoid editorializing or expressing personal opinions, unless specifically authorized by senior news management, in the context of their news reporting duties. This prohibition also extends to the provision of any political or policy opinion outside of work, whether in a speech or on a panel, as a guest on another television show, a newspaper editorial, or even musings on social media. Any questions regarding

the distinction between editorializing and a fact-based analysis should be directed to senior news management.

3. **Stories regarding Charter** In the interest of full transparency and disclosure, any story that mentions the Company, any of its subsidiaries, or any entity in which the Company has an ownership interest should note that Charter is the parent company (e.g., “Charter Communications is the parent company of Spectrum News” or “Spectrum Reach and Spectrum News are both owned and operated by Charter Communications.”).
4. **Advertisers & Content** Selling advertising is a necessary part of our business. Like other commercial media, we depend upon advertising to support our news operations. However, advertisers who purchase commercial inventory on Spectrum Networks do not gain any rights to control the content of our programming. Accordingly, requests by advertisers for script approval or any other form of content control must be rejected. Editorial personnel should politely but firmly refuse to communicate with advertisers about the content of any programming produced by Spectrum Networks and should direct inquiries or complaints to senior news management.

Spectrum Networks reserves the right to reject any advertisement at any time if the Committee deems it incompatible with our news standards and practices.

This policy is not intended to discourage or prevent Spectrum Networks journalists from covering or interviewing advertisers who are the subject of legitimate news stories.

5. **Licensing Content to Political Entities** Unless approved by senior management, Spectrum Networks content in any form may not be licensed out to or shared with any political or issues-based organizations (e.g., PACs, political campaigns) for their advertising, commercial, political, or other purposes that may diminish our standing as an objective purveyor of news and information.

C. Social Media

On personal or network social media accounts when commenting on the news, you should uphold the same journalistic principles as with on-air or published stories. When commenting on

topics unrelated to the news, understand that you have a public presence and for some represent Spectrum Networks, so exercise appropriate care.

Employees are in no event allowed to use their social media accounts to promote brands or events for which they receive compensation (i.e., sponsored content), whether that be monetary or in the form of free products.

D. Other (Stationery, Credentials, etc.)

Spectrum Networks or Charter stationery may not be used for personal correspondence. Where applicable, applications for press passes/media credentials are approved by senior news management and are only to be used in the course of performing job duties.

III.

CONTENT CREATION**A. Sources and Attribution**

Journalists should always pursue the best and most direct source for information. That means you should attribute every statement in every story unless it (a) is an established fact or stems from direct, firsthand knowledge because a reporter, photographer or camera operator was on the scene, and (b) is information clearly in the public domain, such as, public court documents or election results. Good sources and well-defined sourcing help to protect the integrity of the story from outside pressures, manipulation and other hazards, such as hoaxes. While every effort should be made to obtain information on the record, it's understood that in rare circumstances, undisclosed sourcing may be necessary. Stories based on anonymous sourcing require particularly rigorous cross-checking. For example, if a source tells you that they received information second hand from another source, you should always attempt to follow up with the original source.

The intention of the Company is to be honest in sourcing and never mislead the viewer, including through the use of pseudonyms.

Any information or quotation not obtained from Spectrum Networks reporting should be attributed in full so as to avoid any charges of plagiarism.

These sourcing and attribution considerations come into play in any third-party content we come across, including materials, such as handouts, created by non-journalistic entities with a vested interest in promotion of such materials. These materials should be used sparingly and only when other sources for such materials are unavailable or difficult to obtain.

Furthermore, members of the Networks Staff should not accept employment from a news source or engage in any business or financial transaction with a source.

B. Interviews

As a general rule, we will not agree to an interview subject's request that an interview be limited to specific questions or, conversely, that particular questions be considered off limits. We do not pay, provide other compensation, or give anything else of value for interviews. Interviews must always be aired fairly and honestly and editing should never distort a respondent's answers.

C. Use of Videotape and Photographs

Fairness and accuracy should also be our guideposts in the editing of videotape and the use of photographs. With the advent of increasingly sophisticated electronic technology, we must remain vigilant in ensuring the integrity of the pictures/videos we use in our programming. No electronic manipulation or alteration of photographs or video clips that would mislead our viewers is permitted. All file footage should be identified as such if there is the possibility of confusing the viewer. Dating of file footage is always preferable to the use of a generic label.

D. Demonstrations/Re-creations v. Staging

In certain rare circumstances, it might be necessary to illustrate a story with a demonstration or re-creation of an event that occurred. Once the appropriate senior news member has determined that to be the case, we may proceed.

As for staging, the creation of an event that did not occur or any deliberate attempt to present footage orchestrated to appear as factual events, is prohibited. We should report the facts as they happen, and we should not create or stage events that did not occur. It is the responsibility of all members of the Networks Staff to uphold the no-staging policy. Staging or any other intentional misrepresentation of facts, whether or not it involves staging is grounds for immediate dismissal. Knowledge of and failure to report an act of staging is also grounds for disciplinary action.

E. Notes, Outtakes and Archival Material

Spectrum Networks is the owner of all material prepared by its employees in the course of producing our news programming, including reporters' notes and outtake material. No member of the Networks Staff may release notes, outtakes, or archival material to anyone outside the Company without advance permission from the appropriate senior news management and the Spectrum Networks law department.

We will consider outside requests for archival material (i.e., previously aired material) issued pursuant to a subpoena. Such requests should be directed to the Spectrum Networks law department as soon as possible upon receipt.

F. Investigative Reporting

As a general policy, Spectrum Networks journalists should identify themselves as Spectrum Networks journalists. In the rare circumstances where it may be necessary for a reporter or producer to withhold his or her identity, senior news management should be consulted in advance.

G. Privacy

In the course of our news reporting, issues will arise that require a balance in the duty to provide newsworthy information to the public against the privacy interests of those about whom we report.

The simple baseline rule is that [newsworthy] information [relevant to a story] gleaned from public records (e.g., birth certificates, death certificates, police arrest reports, and judicial proceedings), and events taking place in public places for which there is no reasonable expectation of privacy, are fair game for reporting. In other scenarios, the rules can be more nuanced and also implicate various state and federal laws that apply differently depending on various factors. Any reporting that involves any of the below should be brought to senior news management and Spectrum Networks law department.

H. Objectionable Material

No general policy can anticipate or resolve all questions of taste. Decisions about what material may be objectionable must be based on careful consideration of many variables, including the facts in each instance, where the material will be placed in a particular program and when it will be shown. In certain cases, the determination may differ depending on the platform (e.g. linear versus digital).

Any question as to whether any material, either pictures or words, might be objectionable, should be referred to senior news management. Senior news management should decide in consultation with the Spectrum Networks News Standards Committee (keeping in mind any applicable FCC rules) whether to air profane language or extremely graphic footage.

I. Crime

Be cautious when reporting the names of any suspects, whether they're being questioned or have been named by police, unless the person has been arrested or formally charged with the crime. If the suspect has been arrested and not yet charged in court, use discretion as to whether to report the person's name based on the circumstances surrounding the crime and arrest, and note in the story that the suspect has not been charged. Extra thought should go into whether or not suspect names should be included in digital reporting, as our policy is not to remove names in digital articles once published. Local news management has discretion to report a suspect's name in certain situations as the News Director deems necessary. Race should never be used as the sole identifying characteristic.

We also should be sensitive about reporting the names of minors charged with crimes, unless they are charged as adults. Even if the juvenile is being charged as an adult, it should not be a knee-jerk decision to reveal the name or photo.

J. Threats

In general, the decision of how, and whether or not to, cover threats, including those to schools, has varied widely among news outlets. That said, in an effort to establish a consistent policy and more importantly to deter "copycatting," there must be a very high bar when it comes to reporting threats. Contact senior news management if you become aware of any report of a threat.

IV. THIRD-PARTY CONTENT

Overview

Generally speaking, permission from the owner of a work is required unless the work is in the public domain or unless the work may be used under the concept of fair use. Even where a work is widely accessible and posted on social media, it is important to determine who owns the material and to determine if a license is appropriate. If there is any question about the use of third-party audio and video or any hand-out material, consult senior news management or the Spectrum Networks law department.

V.**POST-PUBLICATION ISSUES****A. Retractions, Corrections and Updates**

We owe it to our audience to keep them informed as well as to correct or update the record when circumstances dictate. If we learn that we have made a significant factual error in reporting, the appropriate senior news management should be promptly notified. Any decisions about whether or not to issue a correction or retraction should be carefully considered with senior news management and Spectrum Networks law department. This general rule regarding corrections does not apply in the breaking news or developing story context as long as it is clear to the viewer that the story is expected to be changed or updated.

B. News Organizations and Law Enforcement

There is often a delicate balance to maintain in the relationship between law enforcement and the newsroom. On the one hand, law enforcement, in the important work it does can be a valuable resource for newsgathering, such as when we are reporting on crime or issues of public safety or emergencies. On the other hand, our interests may diverge if in its investigative efforts, law enforcement seeks disclosure of information or materials protected by the First Amendment. In view of this balancing act, any newsgathering that involves cooperation with law enforcement should be done in a manner that leaves no doubt that the journalist is a neutral observer and gatherer of information, and any request (whether written or formal) for information or materials from law enforcement should be routed to senior news management to ensure compliance in an appropriate manner.