

FINDLAY PUBLISHING COMPANY  
RADIO DIVISION

WFIN/WKXA, Findlay, Ohio  
WBUK, Ottawa, OH  
WCSI/WKKG/WINN, Columbus, Indiana  
WWWY, North Vernon, Indiana

*EQUAL EMPLOYMENT OPPORTUNITY PROGRAM*

I. General Policy

It is our policy to provide equal employment opportunities to all qualified individuals without regard to race, color, religion, sex, national origin, age, marital or veteran status, the presence of a non-job-related medical condition or handicap, or any other legally protected status in all personnel actions including recruitment, evaluation, selection, promotion, compensation, training and termination.

It is also our policy to promote the realization of equal employment opportunity through a positive and continuing program of specific practices designed to ensure the full realization of equal employment opportunity without regard to race, color, religion, sex, national origin, age, marital or veteran status, the presence of a non-job-related medical condition or handicap, or any other legally protected status.

To make this policy effective and to ensure conformance with the Rules and Regulations of the Federal Communications Commission, we have developed an Equal Employment Opportunity Program, which includes the following elements:

II. Responsibility For Implementation

The person responsible for implementation and administration of our Equal Employment Opportunity program is the Station Manager/General Manager of each Radio Station.

It will also be the responsibility of all persons making employment decisions with respect to recruitment, evaluation and selection to ensure that our policy and program are adhered to and that no person is discriminated against in employment because of race, color, religion, sex, national origin, age, marital or veteran status, the presence of a non-job-related medical condition or handicap, or any other legally protected status.

### III. Policy Dissemination

To assure that all members of the staff are aware of our Equal Employment Opportunity policy and their individual responsibilities in carrying-out this policy, the following communication efforts are made:

1. EEO briefings have been and will continue to be conducted for top management to help them understand the importance of EEO law and to assist them in fulfilling their responsibilities with respect to our EEO program.
2. We will provide in-house training regarding our EEO program for all supervisory personnel.
3. Appropriate notices are posted informing applicants and employees that our company is an Equal Employment Opportunity Employer and that they have the right to notify an appropriate local, state or federal agency if they believe they have been discriminated against.
4. Our application form contains the following statement:  
  
“We consider applications for all positions without regard to race, color, religion, sex, national origin, age, marital or veteran status, the presence of a non-job-related medical condition or handicap, or any other legally protected status.”
5. A periodic and continuing review of our policies, procedures and practices will be made to assure full understanding of and compliance with applicable EEO laws and regulations.

### IV. Recruitment

To assure that this Radio Station will provide equal employment opportunities to all qualified individuals without regard to race, color, religion, sex, national origin, age, marital or veteran status, the presence of a non-job-related medical condition or handicap, or any other legally protected status, the following recruitment efforts are made:

1. The Radio Stations will maintain contact with minority and female referral sources.
2. Any advertisements used for recruitment purposes contain the phrase “EOE” (or similar phrasing) to indicate no explicit or implied preference for one sex over the other. In selection of media for such advertisements, publications with significant circulation of which are of particular interest to females and minorities are utilized.
3. We encourage present employees, particularly female and minority employees, to refer candidates for existing job openings.

4. A copy of all applications of candidates for a particular position who are not hired, as well as a copy of all applications received at random when no opening exists, will be kept on file for a minimum of 6-months and will be considered during that time for any openings for which skill, abilities and experience may qualify them.
5. A file will be kept for each opening that occurs at the Radio Station. Contents of this file will include the following:
  - a. A job description for the particular position.
  - b. A copy of the notice posted advising employees and potential applicants of the opening.
  - c. A list of the agencies to which an announcement of the job opening is sent along with a copy of the announcement.
  - d. A copy of each advertisement released in the media for recruitment purposes with a list of the media in which the announcement appeared.
  - e. A list of all applicants interviewed and the recruitment source from which they learned of the opening.

#### IV. Training

Each Radio Station will provide training to each new employee, which will consist of the following:

1. Training in the form of thorough orientation will be given to each new employee to provide information on company policies and benefits.
2. It is the responsibility of the employee's immediate supervisor to provide orientation and any on-the-job training that is required.
3. We encourage all employees, including minorities and women, to prepare themselves for advancement and promotion opportunities.
4. We pledge to work with area colleges and universities on work-study programs, summer internships and other programs as they become available.

#### V. Effectiveness

Each Radio Station will maintain a file with the following information:

1. We will review regularly each Employment Unit's new hires, terminations and reason for termination (voluntary or involuntary). This data will provide the necessary information for analysis of the effectiveness of our EEO program.
2. Record all promotions and transfers as they occur.