

ETHICS AND CONFLICT OF INTEREST POLICIES

JOURNALISTIC CODE OF ETHICS

MBN provides news and information that is consistently objective, accurate, authoritative, relevant, balanced, and comprehensive on all its platforms. MBN strives to serve as a model of the free press in the American tradition, and to promote freedom, democracy, and human rights, including freedom of religion. MBN has a mandate to present the policies of the United States government in a clear and effective manner through news reporting and responsible discussion.

The Journalistic Code of Ethics applies to all MBN Journalists, including employees working as reporters, writers, editors, producers, anchors, correspondents, broadcasters, show hosts, and podcasters ("Journalists"). The Journalistic Code of Ethics applies to all content broadcast on television or radio, or posted or streamed on any digital or social media platform.

ACCURACY AND SOURCING

MBN's Journalists must ensure that all broadcasts and digital posts are factually accurate.

- The information included should be based on reliable, recognized, and authoritative sources.
- All information must be properly attributed.
- All materials, including photos, video, or audio obtained from any third party (other than one of MBN's licensed wire services or video providers) should be authenticated.

No report on any MBN platform should be based on rumors, unsubstantiated or outdated information, or unreliable sources. It is more important to be accurate than to be the first to report information.

IMPARTIALITY/AVOIDANCE OF ADVOCACY

MBN's Journalists should present news and information on all MBN platforms in a factual manner that enhances understanding of the events and issues and provides clarity. MBN's Journalists should present opposing or differing views accurately and in a balanced

manner. When those whose views are important for balance decline to comment, it is appropriate to note this in the story.

MBN is independent from all political parties, ruling or opposition groups or organizations, émigré organizations, commercial or other special-interest organizations, and religious bodies. MBN does not, explicitly or implicitly, endorse or advocate any specific political, economic, or religious viewpoint. *No report by MBN on any platform should do so.*

COVERAGE OF TERRORISTS

MBN does not provide a platform for terrorists or those who support them. This has long been the policy of all United States international broadcasting organizations. MBN does not broadcast live speeches or interviews with persons designated as terrorists unless the broadcast has been expressly approved, in advance, by the President or the President's designee.

MBN's Journalists should not use material created by terrorist groups (including photos and video) unless approved by the President or the President's designee.

ANONYMOUS SOURCES

Unless approved in advance by the President or the President's designee, persons appearing on MBN's broadcasts or being quoted in MBN's reports should be identified by their real names and, as appropriate, their titles or positions. *MBN's Journalists may not promise anonymity or confidentiality to anyone unless they have obtained permission from the President or the President's designee.* Such permission generally will be granted only in instances where the masking of a subject's identity is necessary to protect his or her personal safety.

MBN's Journalists should not include derogatory information in their stories where that information is based on anonymous sources. Where broadcasts or reports include derogatory comments, these comments should be brought to the attention of the person against whom they were made, and the reply of that person sought.

MINORS

Minors (anyone under the age of 18) should be interviewed only when their views are important to the story. Where an interview could have safety or legal consequences for a minor, consent from his or her parents or legal guardians must be obtained. Questions about obtaining consent should be addressed to the General Counsel.

PROHIBITION OF PERSONAL OPINION/ANALYSIS AND COMMENTARY

Content on all platforms should contain sufficient background information and explanation to enable viewers, listeners, or readers to better understand the significance and consequences of the news and information being reported. Background material and explanation is often provided by third parties and may take the form of analysis or commentary.

- * Analysis provides authoritative views on an issue or event from a particular point of view but does not include the personal opinion of the speaker. Analysis is preferred over commentary.
- * Commentary is analytical in content and judicious in tone but reflects the personal judgment or opinion of the speaker.

MBN's Journalists may occasionally provide analysis; where they do, it should clearly be labeled as such. *MBN's Journalists should not insert their personal opinions on any platform at any time and should not provide commentary.*

TONE OF MODERATION AND RESPECT

MBN's Journalists should conduct their newsgathering (including interviews), broadcasts (including talk shows and debates), and interactions on social media in a calm and professional tone and should project a model of civilized, reasoned discourse, as well as respect for the human rights and dignity of all persons. MBN's Journalists and guests should not make religious, racial, ethnic, gender-based, socio-economic or cultural slurs upon any person or groups or feature material which could be construed as an incitement to violence.

EDITING AND PRODUCTION STANDARDS

MBN's Journalists should ensure that news and information reported by them on any platform reflects fairly and honestly and without distortion what was said to, heard, or learned by them and/or recorded by MBN's cameras and microphones.

INTERVIEWS

Although it is permissible to have generalized discussions with interviewees about the subjects to be covered, actual interviews must be unrehearsed. All recorded interviews are subject to editing; MBN's Journalists should not represent to any interviewee that the interview will be carried in full.

Interviews should be edited in a straightforward manner, preserving, even in short sound bites, the sense of the interview. Answers may not be taken out of context or edited together in a manner that changes their meaning. The narration leading to a sound bite should reflect the question that elicited the response.

Raw or edited footage or recordings and drafts of stories containing interviews may not be shown, played for or read to an interviewee in advance of broadcast or publication, nor may the interviewee participate in the editing process. It is acceptable to reach out to an interviewee for further clarification of statements made by them.

REQUESTS FOR COPIES, RAW FOOTAGE, DRAFTS OF REPORTS

Requests for copies of stories appearing on any MBN platform should be directed to the Director of Executive Communications. Requests for raw footage or drafts of stories must be sent to the General Counsel. MBN's Journalists may not provide any of these materials to any third party without the permission of the Director of Communications or General Counsel, respectively.

MBN CONTENT DISTRIBUTION

MBN staff may not offer any MBN content to media outlets or other external organizations for use in the United States or abroad without the written approval of the General Counsel and President. Any request for MBN content from domestic media, overseas media, or other external organizations should be forwarded to the General Counsel for response. MBN staff are prohibited from engaging in any activities, including advertising and marketing, aimed to develop MBN audiences within the U.S.

ERRORS AND COMPLAINTS

Factual errors – whether on-air or in print – should be corrected as quickly as possible after their discovery.

Serious errors (*e.g.*, reporting the death of someone who is, in fact, alive) demand immediate correction on-air and/or online. Errors of fact that do not significantly affect a story should nevertheless be corrected on the same program on which they were first broadcast – or on the same site as they were originally published -- as soon as it is practical to do so. All errors should be brought to the attention of the President or the President's designee.

Errors having potential legal consequences must be brought to the attention of the General Counsel *before* being corrected. Complaints from sources or persons described in a

broadcast or story should be referred to the General Counsel. All calls or correspondence from attorneys should be referred to the General Counsel.

ETHICAL CONDUCT

MBN's Journalists are required to maintain the highest ethical standards in all conduct and must take particular care to avoid any conflict of interest, or the appearance thereof, in their relations with individuals, groups and/or political or commercial organizations. MBN's Journalists must remain free of associations, activities, or conduct that could, or could appear to, compromise their integrity, damage their credibility, or jeopardize their journalistic independence.

- MBN's Journalists prohibited from accepting gifts, favors, fees, free travel, entertainment (including tickets), accommodations, and meals from any government, governmental official, or governmental organization at any time, and from person or organization they cover or could cover.
- MBN's Journalists must not accept secondary employment, engage in political campaigns or organizations, hold public office and/or serve in community organizations to the extent any of these could compromise -- or appear to compromise -- their journalistic independence or integrity. Permission for any such employment or involvement must be secured from the General Counsel before any participation begins.
- MBN's Journalists must not use their employment at MBN for personal gain.
- MBN's Journalists must adhere to the letter and spirit of MBN's Social Media Policy.

MBN's Journalists may not, absent the express advance written permission of the President or the President's designee *and* the General Counsel: (a) appear on radio or television programs, in print, or in commercial advertising; (b) write (under their own names or pseudonyms) for publication (electronic or otherwise) on any topic; or (c) serve in any capacity in any political or advocacy group.

USING MATERIAL BELONGING TO OTHERS

MBN's Journalists use a variety of sources to report and illustrate their reports. The use of material belonging to or created by third parties requires appropriate permission and/or appropriate attribution.

- *Permission:* Some sources for news (*e.g.*, AP, Reuters) are available to MBN's Journalists through license agreements paid for by MBN. These sources should be used judiciously (first-hand reporting by MBN staff is always preferable to

wire services) but their use does not require additional permission. Other sources (*e.g.*, CNN, YouTube, Tweets) may only be used with a specific license *or* consistent with the principles of Fair Use. The fact that a story, video or photograph is available on-line does not mean that it can be made part of a television or radio broadcast or digital report without either the approval of the rights holder (in the form of a written license agreement) or the permission of the General Counsel. All other uses are strictly prohibited.

- *Attribution:* Material created by third parties (including text, video and graphics) may not be used without proper attribution and credit. MBN's Journalists should use quotation marks around sentences they did not write and identify the source of the quoted material. Maps, graphs, visual arts, music, sounds, video, and charts created by third parties must be properly credited. Using other people's work without attribution constitutes plagiarism and is strictly prohibited.

All questions about the use of material belonging to others should be addressed to the General Counsel.

SOCIAL MEDIA

The core principle underlying MBN Social Media policy is that MBN employees must not do or say anything on social media sites that could undermine MBN's reputation for journalistic balance and objectivity. Accordingly, this policy imposes tighter constraints on MBN's journalists (who remain bound at all times by MBN's Journalistic Code of Ethics) than it does on all other Company employees.

Principles for All Employees

Assume that everything you write or post on social media sites, regardless of location and time (or equipment you use), is public. Even posts to a private page can be shared with a wider audience.

Do not reveal confidential or proprietary information about MBN.

Protect your privacy and safety online:

- * You are encouraged to use complex passwords and two-factor authentication on your social media accounts.
- * You should be mindful of posting personal details on the Internet, particularly if you feel there is a chance that you may become a target.

Be courteous and polite. Do not post comments that are derogatory, harassing, offensive or otherwise in violation of MBN's anti-discrimination and anti-harassment policies.

You are forbidden from monetizing MBN content for personal gain.

You do not require permission to repost published multimedia or text content belonging to MBN, but you must properly credit the material and provide a link to the original.

This social media policy is not intended to restrict your rights under federal labor law.

Additional Rules for MBN's Journalists

Every employee who is subject to the Journalistic Code of Ethics is subject to these additional rules regarding their use of social media. These employees include – but are not limited to – reporters, editors, anchors, correspondents, broadcasters, show hosts, and podcasters (“Journalists”). (If you have a question as to whether you are required to adhere to these additional rules, please consult the General Counsel.)

MBN's Journalists may NOT:

Use their social media accounts to advance any political cause, support any political party, or send messages that will undermine our audience's trust in their impartiality. *If you can't say it on air, you may not say it on social media.*

Express their personal opinion on news stories MBN is covering or on topics MBN covers.

Post raw or unpublished content that has been prepared or is being prepared by MBN.

Retweet or repost content that violates this policy.

Share third party advocacy or political content.

VIOLATIONS OF THE CODE OF JOURNALISTIC ETHICS

Violations of any provision of this policy may result in disciplinary action, up to and including termination of employment.

BUSINESS ETHICS AND CONDUCT

MBN is committed to the highest standards of ethical conduct. MBN expects all employees to act with integrity as their actions can directly or indirectly affect MBN. MBN's commitment to integrity goes beyond the letter of applicable federal and state laws.

CONFLICT OF INTEREST

MBN requires that its employees, officers, and board members disclose their involvement in any activity, practice, or conduct that may conflict with or might reasonably appear to conflict with the interests of MBN. The purpose of this policy is to prevent the interests of any employee, officer, or board member from interfering with the performance of his or her duties to MBN, and to ensure that there is no personal, professional, or political gain made at the expense of MBN.

This policy requires the disclosure of any conflicts of interest and the recusal of any interested party in a decision relating thereto. Since it is impossible to describe all situations that are or give the appearance of being conflicts of interest, the specific prohibitions and general descriptions included here are not intended to be exhaustive. A conflict of interest may exist when the interests of any employee, officer, or board member or such person's relative, or any individual, group, or organization to which that person has allegiance, are or could be perceived as adverse to the interests of MBN. A conflict of interest may also exist when the interests of any of these parties could impair or could be perceived as impairing the independence or loyalty to MBN of any of its employees, officers, or board members.

Examples:

A conflict of interest may exist if an employee, officer, board member, or relative:

- Engages in outside work or activity (paid or unpaid) that conflicts or could be perceived as conflicting with the interests of MBN or that individual's obligations to MBN.
- Has any business or financial interest in any third party dealing with MBN, including but not limited to its vendors, suppliers, or contractors. (This does not include the purchase and sale of publicly traded securities amounting to a less than five percent ownership interest.)
- Holds office, serves on a board, participates in management, or is employed by or serves as an advisor or consultant (paid or unpaid) to any third party dealing with MBN, unless these activities are conducted as a representative of MBN.
- Derives remuneration or financial gain from any transaction involving MBN.