

WWTV(TV) and WWUP-TV EEO Public File Exhibit

This exhibit explains the late posting of the annual EEO Public File Reports.

Over the last 3 years, Heritage Broadcasting has experienced significant leadership change and retirement of key employees. The circumstances of these changes combined with the change in work environments brought on by the COVID-19 pandemic resulted in a loss of and gap in knowledge that has allowed some things to fall through the cracks of which the licensee has only recently become aware.

In October of 2019, Sherri Magiera retired after 40 years with the organization. She was responsible for our EEO reports and recordkeeping and otherwise the primary resource for all EEO matters. Other managers were aware of the requirements that pertained to them and their divisions; however, Ms. Magiera was responsible for the full requirements and maintained all the compliance records. Upon her retirement, Heritage hired a human resources manager to fill her role, however due to personal and unforeseen circumstances, that person resigned after a few days after Ms. Magiera's retirement. Heritage immediately launched a search for a replacement, which unfortunately lasted several months. A new human resources manager with substantial EEOC knowledge was hired in December of 2019. However, with the previous rapid turnover and intervening period, the EEO records were misplaced and, while the new human resources manager immediately implemented all required EEOC requirements, she was unaware of the FCC EEO program. Compounding the problem, our News Director also departed the company in early April 2019 and many of the interview records were lost with his departure.

Unfortunately, the full company knowledge respecting FCC EEO program requirements was lost during this time. Although HR was not consciously aware of its requirements, broad outreach did occur during the station's subsequent hiring opportunities and those efforts have been reconstructed and reported in the attached EEO Public File reports.

In a normal year and circumstance, questions would have been raised by other employees who might have brought our new HR manager's attention to the FCC EEO program. However, as stated above, most of the staff began working from home early in the 2019 -2020 period. Most employees focused on their own responsibilities and had much less opportunity to observe and discuss other station activities, including staff replacements. As a result questions were not raised that might have furthered the new HR manager's understanding of FCC requirements. License renewal preparation raised its profile, and at that time, the HR manager attended an EEO webinar through a broadcasting trade organization. The training from that webinar resulted in the effort to gather the information from all available resources at the station and complete the missing required annual EEO Public File reports. Fortunately that effort was successful as demonstrated by the attached, and now uploaded reports. However, given the circumstances reported here, Heritage cannot certify it timely uploaded them as required by the FCC rules.

Heritage is pleased to report, however, that since December of 2019, and despite the COVID pandemic, we have recruited for all full-time employees using recruitment sources sufficient to ensure wide dissemination of information throughout the community as well as regionally and nationally.

As reported in our now uploaded public file reports, Heritage has also continued to participate in many supplemental recruitment initiatives ranging from hosting and/participating in career fairs, station open houses & tours, and other events to further educate the community about employment opportunities in the broadcasting industry and to expand the pool of talent. We have also continued to work with area

educational institutions to further knowledge in the communities about opportunities in Broadcast. Education and awareness are very important to our mission as a small market station. As such, we are continuously looking for ways to do more. This year, we began working with the Small Business Association of Michigan and Wexford-Missaukee Area Career Tech Center to institute an apprenticeship program for broadcast positions, in particular for off-air talent. This will officially begin in the fall of 2021.

To assure we are fully compliant and prepared going forward, Heritage is making mandatory changes to retain and organize our records at all department levels and to ensure compliance. We have contracted with Broadcast1Source to streamline and harden our recordkeeping. Full training, including attending a webinar and distribution of an EEO compliance manual is also scheduled for all managers in June of 2021 to ensure a full dissemination and understanding of the requirements.

Please see also our EEO Policy Statement beginning on the next page.

Heritage Broadcasting of Michigan

EEO POLICY STATEMENT

Heritage Broadcasting of Michigan (Heritage) is an equal opportunity employer committed to meeting the Stations' EEO obligations. We have established, maintain, and carry out a positive continuing program of specific practices designed to ensure broad outreach, equal opportunity and nondiscrimination in every aspect of station employment policy and practice. The stations achieve broad and inclusive outreach whenever it has a hiring opportunity. Periodic announcement broadcasts welcome organizations interested in referring candidates for our hiring availabilities to notify us that they would like to receive notices whenever there is a job vacancy to be filled. All organizations that express an interest in notification of new hiring opportunities will be provided with notice as soon as possible. All of our outreach activities are attended by company personnel with hiring authority as interpreted by the Commission.

In addition, all Employment Unit hiring goes through our assigned EEO Officer, whose responsibility is to ensure the stations are compliant with EEO policies. EEO Memos are posted within our building and a copy is given to all new employees. All new positions, with the exception of an occasional exigent circumstance, are subjected to broad outreach before hiring decisions are made.

In accordance with 73.2080 (b) each manager knows our policy from our periodic manager meetings to send all the openings we would have to all our recruitment sources including Broadcast1Source and the Michigan Broadcasters Association. We announce openings on our stations and post them to our website. To broaden our pool of referral organizations for future positions, Heritage belongs to Broadcast1Source and utilizes its resources for notification to the greatly expanded pool of several hundred outreach organizations created by it and the Michigan Broadcasters Association. Periodically we evaluate the effectiveness of our outreach contacts. Our goal is to delete unresponsive contacts and add new outreach organizations and institutions from our area or neighboring states whenever information becomes available to make that possible.

In accordance with 73.2080(c)(4), our management analyzes pay benefits and seniority practices, promotions and selection techniques every time we hire a full time employee based on training opportunities made possible through webinars, emails or other information made possible through broadcaster associations, state resources and other sources. We have no union agreement. The EEO Officer for the company periodically does a comparison of employee salaries to ensure there is no discrimination based on sex, sexual orientation, religion or race in regards to the job assigned and the pay received. Employee pay is based on performance and merit. All benefits (Health Insurance, vacation, sick leave, etc.) afforded to our employees are the same for everyone and based entirely on length of service and at the sole discretion of each full-time employee as to whether they avail themselves of the offered benefits. It is the ongoing policy of our company to ensure that all decisions made concerning employees are made based on job performance and not discriminatory.

Our advertising sales agreements state that the station does not discriminate in the sale of advertising time and will accept no advertising which is placed with intent to discriminate on the basis of race, ethnicity, religion, sex or sexual orientation.