

Montana EEO Plan Narrative- KULR 12/01/2021

Cowles Montana Media Company has a formal EEO plan that includes a Diversity, Equity and Inclusion (DEI) policy through which the Company strives to provide equal employment opportunities to all qualified individuals in all personnel actions including recruitment, evaluation, selection, promotion, compensation, training and termination. The Company also promotes this through positive, continuing programs of specific practices. These include identifying the station Managers for responsibility in administration of each market's EEO program. All supervisors and department heads that make employment decisions are also tasked with implementation of our policy to ensure no person is discriminated against. This EEO policy is documented in the employee manual and all employees read and acknowledge they have read the entire policy manual. All Full-Time job openings are posted to sites identified and evaluated periodically. A few years ago, the Company promoted a long-time employee to become Director of Recruiting and Training (DRT), charged with developing a database of potential candidates for broadcast related positions and recruiting regularly through various job fair and college campuses. The DRT also searches You Tube videos and other online sources to help with the recruiting process.

Throughout the last two years the DRT has participated in several job fairs to seek out potential qualified candidates. Also, in the last two years the DRT participated in five events sponsored by educational institutions related to career opportunities in broadcasting in which he has broadened outreach for the broadcast industry and developed several leads for potential job applicants. Also, at KULR, station representatives visited several local high schools to discuss what is involved in sports productions and positions available at the station for their secondary digital channels sports stations sports productions. The DRT also coordinates an internal training program with our Corporate Director of Content and Marketing to work with news employees including the news directors, producers and multi-media journalists for guidance on news story selection, time management and critiques, personal training/visits and podcast/training videos.

Additionally, the Company provides various training for all employees from top Station Managers to entry level employees that includes attending conferences, webinars, online training, etc. Over the last couple years, a good portion of the training was virtual or remote due to COVID restrictions, but the Company has maintained the emphasis on training for employees such as additional online training for sales executives when they weren't able to physically visit advertisers or agencies.

The Company is also committed to train employees to promote from within whenever possible. Many employees work at smaller market stations and gain valuable experience to be promoted to a larger market within the Company or stations owned by the same parent Company. Also, some employees interested in advancement such as management opportunities are also considered for management positions at smaller market stations to gain experience. At KULR in the last two years there were 6 internal promotions including a female anchor promoted to the Station Manager position out of 23 total hires.

As additional outreach, KULR provided one station tour this last year in which the broadcasting industry was explained including job opportunities and the requirements needed for the jobs. This outreach goal has been limited these last two years due to COVID restrictions.

In the last year, the Company has been building a DEI program to improve the understanding and mutual respect of employees, make the Company a more competitive, inclusive employer in the job market, encourage multiple perspectives when problem-solving and ensure that all cultures, backgrounds and experiences are valued in our ever-changing workforce. The Company sponsored a DEI speaker series by Erin Jones, a prominent Washington state education and systems consultant that included 3 virtual discussions via Zoom. Most employees participated. Additionally, we established a newsletter and DEI Facebook page to communicate to employees and created a Broadcast DEI committee that is creating goals for continuing education, action and accountability for the program.