

GUILD PROPOSED
ETHICS CODE COVERING GUILD-REPRESENTED EMPLOYEES

This Ethics Code applies to all employees covered by the collective bargaining agreement between The Baltimore Sun Company and the Washington-Baltimore Newspaper Guild. These employees are referred to as "employee" or "employees" in the Code. Part III of this Code applies only to employees of the News and Editorial Departments **who are directly involved in the reporting of the news, and thus does apply to editorial assistants, copy persons, communication clerks, librarians, wire room clerks, and other similar News and Editorial Department employees.**

All non-Guild unrepresented Baltimore Sun employees will be covered by an Ethics Policy that meets at least the standards of this policy and is effective on or before the effective date of this policy. All Ethics Policies affecting The Baltimore Sun employees, managers, and The Publisher shall be posted on the Loop upon their effective date.

PART I. INTRODUCTION

Integrity is one of the fundamental values to which The Baltimore Sun Company (the "Company" or the "Publisher") is committed in carrying out its mission. Truth, objectivity, and independence are the foundation of our business. **They are the standards for all business conduct.** ~~They are the standards that every employee should meet in all business conduct.~~

~~The Ethics Code is intended to help ensure compliance with the highest legal and ethical standards. It is the responsibility of every employee of the Company to understand and adhere to the Code.~~ **that everyone at The Sun understands what it means to meet the highest legal and ethical standards. Meeting such standards is the responsibility of every employee of the Company.**

~~This Ethics Code is not intended to cover every possible situation. The Publisher reserves the right to establish and enforce rules protecting the integrity and credibility of the Publisher, its publications and its employees, even though such rules may not be expressly encompassed within this Ethics Code.~~

That said, this Ethics Code is not intended to cover every possible situation. Though the principles of this policy are fundamental, there is no one-size-fits-all set of regulations that can be universally applied across news, commercial and operational divisions as ethical decisions are almost always contextual. For instance, all recognize that it is important for Sun employees to be engaged citizens, but that sometimes the realities of a journalistic enterprise put limitations on that engagement. Most importantly, ethics are not something that can be imposed from above, but must come from within. The aim of this policy and the ongoing educational and informational programs that The Sun and The Guild will jointly design to disseminate it -- is to help each of us internalize the standards that all of us

who work for The Sun must meet. Whenever one faces an ethical dilemma, consultation with peers and supervisors is always a good policy. While final decisions must at times be in the hands of those in authority, this Ethics Code is not intended to be authoritarian because if this is to be an ethical company, it will not be because those who work here make their ethical decisions based on a fear of punishment or a supervisor's permission, but simply because all of us at The Sun know and understand the principles that lead to doing the right thing. And everyone at The Sun can be assured that reporting any perceived ethical lapses by peers or supervisors will always be protected from retaliation.

~~This Ethics Code is intended to address the Publisher's legitimate business goal of safeguarding the integrity and credibility of the Publisher, its publications and its employees. It is not intended to interfere with the rights of employees to engage in activities protected by Section 7 of the National Labor Relations Act that do not compromise the integrity or credibility of the Publisher, its publications, or its employees.~~

This Ethics Code is not intended to interfere with the rights of employees to engage in activities protected by Section 7 of the National Labor Relations Act, nor to abridge the First Amendment rights of employees, discourage appropriate participation in community life or prohibit reasonable outside work.

~~The Publisher reserves the right in its sole discretion to modify or change this Ethics Code.~~

If any term or provision of this Ethics Code is at any time in conflict with any law, such term or provision shall continue in effect only to the extent permitted by such law. If any term or provision of this Code is or becomes invalid or unenforceable, such invalidity or unenforceability shall not affect or impair any other term or provision of this Ethics Code.

This Ethics Code is effective as of ~~September 27, 2004~~. **January 1, 2005, or the first business day after all affected employees have completed comprehensive Ethics Policy training.**

PART II. GENERAL PROVISIONS

Part II of this Ethics Code, General Provisions, is applicable to all employees.

1. LEGAL COMPLIANCE

It is Company policy to comply with all laws and government regulations applicable to our business, both in the United States and in other countries. **It is the company's obligation to notify employees of laws and regulations relating to their jobs.**

Employees should consult their supervisor or Company legal counsel about instances where there is doubt or ambiguity concerning legal requirements or appropriate practices.

2. AUTHORIZED TRANSACTIONS AND ACCURATE ACCOUNTING

~~Expenditures of Company funds and use of Company property should be made only as properly authorized.~~ The Company requires accurate and complete accounting in compliance with accepted accounting rules and controls. All expenditures and payments should be properly recorded and documented. Employees who ~~suspect~~ **have knowledge of** financial or accounting irregularities or fraud should report it immediately to their supervisor or Company legal counsel.

3. IMPROPER PAYMENTS

The Company does not permit or condone any illegal or improper payments, transfers or receipts. Employees should not offer, give, solicit or accept any money or anything else of value for the purpose of obtaining or bestowing business or preferential treatment. (This rule does not prohibit **discounts, placement or other agreements with advertisers, in accordance with company policy, nor does it prohibit** authorized and appropriate business entertainment and gifts. See Part II.4, below.)

No employee shall offer to trade news coverage (or suppress news coverage) in exchange for advertising or other benefits for the company.

No outside consultant, attorney, accountant, contractor, vendor, or agent of any kind should be used in any manner that would be contrary to this prohibition against illegal or improper payments. Fees, commissions and expenses that are paid to such outside agents should be based upon proper billings and reasonable standards for services rendered. As a general rule, payments should be for services or activities of such nature as to qualify for income tax deductibility.

4. COMPETITION AND FAIR DEALING

We seek to outperform our competition fairly and honestly. We seek competitive advantages through superior performance, never through unethical or illegal business practices. Each employee should ~~endeavor to~~ deal fairly with the Company's customers, suppliers, competitors and employees. ~~With respect to our competitors,~~ No employee should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other intentional unfair-dealing practice.

Employees should not provide or accept, from any person or entity doing business with the Company, discounts, business entertainment and/or gifts that exceed reasonable business standards (but see Part III.1.F. for News and Editorial Department employees). Employees should never solicit such discounts, entertainment or gifts. No cash or cash equivalents, such as gift certificates, should be accepted.

All funds expended for business entertainment and gifts must be fully and accurately documented and reflected in the books and records of the Company.

5. CONFLICTS OF INTEREST

It is Company policy that employees should avoid any personal or business relationships, dealings or investments that ~~might~~ create a personal interest that conflicts with the interests of the Company. A conflict situation can arise when an employee takes actions or has interests that ~~may~~ make it difficult to perform his or her Company work objectively and effectively. It is not possible to foresee or define with precision every situation that may constitute a conflict of interest. ~~Conflicts may be actual, potential and even matters of perception.~~

Failure to disclose an ~~actual or potential~~ conflict of interest is a violation of the Code. Conflicts of interest may not always be clear-cut, so if you have a question, you should consult with higher levels of management or Human Resources or Company legal counsel.

~~In addition, c~~Conflicts may occur in, but are not limited to, situations where an employee, or a closely related family member ⁺ :

1. Has a significant financial interest ² in, or obligation to, a competitor, supplier, or customer of the Company.
2. Is employed, part-time or otherwise, by a competitor, supplier or customer of the Company (in the case of a family member, as a supervisor or manager), or sells products to Company employees or recruits Company employees to sell or distribute products.
3. Serves on the board of directors of, or acts as a consultant or advisor to, a competitor, supplier or customer of the Company (other than at the request of the Company).
4. Transacts business with the Company, including buying from or selling to the Company any goods or services (other than transactions in the ordinary course of the Company's businesses, e.g., newspaper subscriptions).
5. Uses equipment, computer software and services, materials, supplies, content (including outtakes), data and other information or business relationships obtained in the course of employment with the Company to advance personal **business** interests.
6. Has a personal business interest that is similar or related to work the employee, the Company, or any of its business units performs or produces. **The Company will ensure that updated listings of its business services and products are available to all employees to aid in their compliance with this section.**
7. ~~Receives improper personal benefits as a result of his or her position in the Company.~~

⁺ ~~Closely related family members generally include an employee's spouse (or domestic partner), children, parents, brothers and sisters, and any person dependent on the employee for support.~~

² An interest amounting to less than one percent of any class of securities listed on any of the national securities exchanges or regularly traded over-the-counter will not be regarded as a "significant" financial interest in the absence of unusual circumstances.

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~~8. Receives a loan or loan guarantee from the Company.~~

~~Failure to disclose an actual or potential conflict of interest is a violation of the Code. Conflicts of interest may not always be clear cut, so if you have a question, you should consult with higher levels of management or Company legal counsel. Any employee who becomes aware of a conflict or potential conflict should bring it to the attention of a supervisor, manager or other appropriate personnel or consult the procedures described in Part II.12 of this Code.~~

6. CORPORATE OPPORTUNITIES

~~Employees are prohibited from taking for themselves personally opportunities that are discovered through the use of corporate property, information or position without the consent of the Publisher. Employees are prohibited from taking for themselves business opportunities that are intended for the company, unless the company declines them. No employee may use corporate property, information, or position for improper personal gain, and no employee may compete with the Company directly or indirectly. Employees owe a duty to the Company to advance its legitimate interests when the opportunity to do so arises.~~

7. CONFIDENTIALITY

~~Employees must maintain the confidentiality of confidential information entrusted to them by the Company or its customers, except when disclosure is authorized by Company legal counsel or required by laws or regulations. Confidential information includes all non public information that might be of use to competitors, or harmful to the Company or its customers, if disclosed. It also includes information that suppliers and customers have entrusted to us. The obligation to preserve confidential information continues even after employment ends.~~

8. PROTECTION AND PROPER USE OF COMPANY ASSETS

~~All employees should endeavor to protect the Company's assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on the Company's profitability. Any suspected incident of fraud or theft should be immediately reported for investigation. Company equipment should not be used for non-Company business, though incidental personal use may be is permitted.~~

~~The obligation of employees to protect the Company's assets includes its proprietary information. Proprietary information includes intellectual property such as trade secrets, patents, trademarks and copyrights, as well as business, marketing and service plans, engineering and manufacturing ideas, designs, databases, records, salary information and any unpublished financial data and reports. Unauthorized use or distribution of this information would violate Company policy. It could also be illegal and result in civil or even criminal penalties.~~

9. POLITICAL CONTRIBUTIONS

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No Company funds or assets may be contributed to any political candidate or political party, unless such contribution is expressly permitted by law, recommended by the Vice President, Washington Affairs, and authorized by the Company's President and Chief Executive Officer. Any such payments shall be reported to the Audit Committee annually. This prohibition relates only to the use of Company funds or assets.

10. SECURITIES LAWS

Insider Trading Is Prohibited. Under the federal securities laws and this policy, employees of the Company are prohibited from buying or selling Tribune Company securities while they are in possession of material inside information concerning the Company. "Inside information" is any information that has not been publicly disclosed. "Material information" is any information that would be of significance to an investor in deciding whether to buy, sell or hold a security or if it would have a substantial effect on the market price of a security if it were disclosed. These prohibitions apply not only to the employee but also to the employee's spouse (or domestic partner), children, relatives who share the individual's residence and certain trusts, partnerships or other entities controlled by the individual.

The Prohibition Also Applies To Other Companies' Securities. The insider trading prohibition also applies to securities of other companies. Employees who learn material inside information about other companies through their work at the Company are prohibited from trading securities of that company while they are in possession of material inside information about that company. This situation could arise in many contexts, including in regard to information employees may learn during the course of the preparation or release of news reports, and information employees may learn about existing or potential customers, suppliers, acquisition targets or business partners of the Company.

Inside Information Should Not Be Provided To Others. It is also a violation of the federal securities laws and this policy to provide other people (friends, financial advisors, business associates, etc.) with any material inside information. This is known as "tipping" and it can result in liability to the employee as well as the other person, even if the employee did not receive monetary profit from the other person's illegal trading. Accordingly, all employees should exercise extreme care when they are in possession of material inside information to ensure that such information is not disclosed, either on purpose or by accident, to any other person other than those to whom the information is essential for Company related business, and even in that situation, the employee should make it known that such information has not been publicly disclosed.

Penalties For Violations Can Be Severe. In addition to being required to disgorge any profit from a securities trade made in violation of the insider trading prohibition, an individual is subject to civil penalty of up to three times the profit gained or loss avoided and criminal penalties not exceeding \$5,000,000 and/or imprisonment for 20

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~~years~~Examples of Material Inside Information. Some examples of information about a company that might be material are:

- ~~• A proposed acquisition or divestiture.~~
- ~~• A stock split or a change in the dividend rate.~~
- ~~• A significant expansion or curtailment of operations.~~
- ~~• A significant change in revenues or earnings from those from a prior period or from those publicly projected.~~
- ~~• A significant product development or significant information regarding a product.~~
- ~~• The institution of a stock repurchase program.~~
- ~~• Extraordinary management or business developments.~~

~~If this type of information is known to an employee and has not been publicly disclosed by the company to which it relates, that employee is prohibited from trading in the securities of that company or encouraging others to trade in those securities.~~

~~Employees are urged to contact their manager or supervisor if they have any questions regarding these rules. These standards related to the securities laws and the insider trading prohibition are not intended to prevent our journalists from reporting previously undisclosed information as part of their news reporting duties.~~

11. REPORTING ANY ILLEGAL OR UNETHICAL BEHAVIOR

~~Employees should talk to supervisors, managers or other appropriate personnel about observed illegal or unethical behavior and when in doubt about the best course of action in a particular situation.~~ It is the policy of the Company not to allow retaliation for reports of misconduct by others made in good faith by employees **or for employees who hesitate or decline to participate in actions they consider unethical.** Employees are expected to cooperate in internal investigations of misconduct.

12. COMPLIANCE PROCEDURES

We must all work to ensure prompt and consistent action against violations of this Code. However, in some situations it is difficult to know what is acceptable. Since we cannot anticipate every situation that will arise, it is important that we have a way to approach a new question or problem. These are the steps to keep in mind:

- Make sure you have all the facts. In order to reach the right solutions, we must be as fully informed as possible.
- Ask yourself: What specifically am I being asked to do? Does it seem unethical or improper? This will enable you to focus on the specific question you are faced with, and the alternatives you have. Use your judgment and common sense; if something seems unethical or improper, it probably is.
- Clarify your responsibility and role. In most situations, there is shared responsibility. Are your colleagues informed? It may help to get others involved and discuss the problem.
- Discuss the problem with your supervisor. This is the basic guidance for all situations. In many cases, your supervisor will be more knowledgeable about the

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question, and will appreciate being brought into the decision-making process. Remember that it is your supervisor's responsibility to help solve problems.

- Seek help from Company resources. In the rare case where it may not be appropriate to discuss an issue with your supervisor, or where you do not feel comfortable approaching your supervisor with your question, discuss it with a senior manager or your department's Human Resources business partner or the Vice President for Human Resources and Legal Affairs. If you prefer to write, address your concerns to: General Counsel, Tribune Company, 435 North Michigan Avenue, 6th Floor, Chicago, Illinois 60611. Alternatively, you can submit your question or issue via a confidential hotline by dialing 1-800-216-1772.
- You may report ethical violations in confidence and without fear of retaliation. If your situation requires that your identity be kept secret, **you will not be required to give your name**, ~~your anonymity will be protected~~. The Company does not permit retaliation of any kind against employees for good faith reports of ethical violations.
- Always ask first, act later: If you are unsure of what to do in any situation, seek guidance before you act.

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Time: _____
Date: _____

GUILD PROPOSAL

PART III. NEWSROOM AND EDITORIAL DEPARTMENT ETHICS

As anyone involved in journalism knows, integrity is the foundation of the profession. As an institution, The Sun scrutinizes the values and conduct of public officials, organizations, professionals and others in our communities. When those of us who are journalists at The Sun do that, we must ensure that we perform that task free of any taint of personal gain.

For more than 150 years, The Sun has set a very high ethical standard, maintaining its credibility by treating its readers and news sources fairly, openly and impartially. Part III of this Code is designed to provide newsroom and editorial employees--including the Publisher and all Sun executives listed on the masthead -- with written guidelines that will help them in their continuing effort to protect and enhance The Sun's reputation.

This section sets forth broad principles and a variety of examples to illustrate those principles. Your integrity will always be something that comes from your own set of internalized values. But when you are in doubt about how to approach a difficult situation, consult people whose judgment you trust. Collaboration and open communication is to everyone's advantage.

~~*The Sun's mission is to "be the most trusted source of news and information" for its readers. Credibility is essential to our success. The integrity of our news and opinion pages must be unassailable. Employees of the News and Editorial departments, (collectively "staff members" for purposes of this portion of the Code) must carefully guard The Sun's independence, credibility and integrity.*~~

~~As an institution, we scrutinize the values and conduct of public officials, organizations, professionals and others in our communities. Therefore, we must set standards for ourselves that are just as high, if not higher. For more than 167 years, *The Sun* has set a very high standard, maintaining its credibility by treating its readers and news sources fairly, openly and impartially. Part III of this Code is designed to provide newsroom and editorial employees with written guidelines that will help them in their continuing effort to protect and enhance The Sun's reputation.~~

Part III does not bind editorial assistants, copy persons, communication clerks, librarians, wire room clerks, and other News and Editorial

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Department employees, except when they are directly involved in the reporting of the news.

No set of rules can cover every situation that might arise in this complex arena. **Ultimately, ethics is not about following rules – or figuring out how to get around those rules. It is much more fundamental than that. At base, it can be summed up in these two sentences: No one should use his or her position at The Sun to gain any personal advantage. No one should do anything to bring into question his or her integrity, nor the integrity of The Sun. If you keep those in mind when facing an ethical problem, you will most likely make the right decision.**

~~No set of rules can cover every situation that might arise in this complex arena. Part III of this Code sets forth broad principles and a variety of examples; more importantly, Part III emphasizes two important values: individual responsibility and collaborative decision-making. If staff members continue to take their ethical responsibilities seriously and collaborate to address the knottiest issues, The Sun will maintain the highest standards of journalistic integrity. But this process will only work if there is open communication regarding these issues. Any staff member who is aware of potential ethical problems – whether it involves their own activities or those of a colleague -- has an obligation to notify a supervising editor and/or the Public Editor immediately. Similarly, any editor to whom an ethical issue is brought should notify the Editor, the Managing Editor, the Editorial Page Editor or the Public Editor as soon as possible.~~

While we have no desire to turn the staff into an ethics police force, we must emphasize how fundamental these principles are to The Sun. For that reason, we urge anyone who is aware of potential ethics problems -- whether it involves their own activities or those of a colleague – to notify a supervising editor and/or the Public Editor immediately. Similarly, any editor to whom an ethical issue is brought should notify the Editor, the Managing Editor, the Editorial Page Editor or the Public Editor as soon as possible.

1. CONFLICTS OF INTEREST

Conflicts of interest are many, varied and often complex. We encourage public scrutiny of our activities, so special vigilance is required throughout our News and Editorial departments to guard not only against conflict, but also the appearance of conflict.

Staff members are obliged to make certain that no outside personal, ~~ideological~~ or financial interests conflict with their professional performance of duties or raise doubts about The Sun's independence, credibility and integrity. ~~Additionally, staff members should avoid activity that could create the appearance of a conflict of interest.~~ **Consultation and communication with editors and others is always appropriate.**

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~~In this and all other areas, the rule always should be that a supervising editor must be consulted if there are doubts about the appropriateness of an affiliation, a practice or a course of action. This consultation should take place before the actual or apparent conflict of interest may occur.~~

A. USE OF SUN CONNECTIONS

Newsroom and Editorial employees must not use their job title or the company's name or influence for their personal benefit or gain and should not seek treatment different from that afforded to the general public. **Similarly, The Sun, as an institution, will not use its status or influence for any institutional benefit or advantage.**

For example, a staff member should not use Sun letterhead to write a personal complaint to a merchant. A staff member should not mention that he or she works for The Sun or use their Sun business card in an attempt to gain leverage in negotiating a price on a personal item.

Similarly, Newsroom and Editorial employees must never threaten to publish an article or block publication of an article or otherwise use Sun connections to gain special treatment or benefits.

One exception to this rule relates to corporate discounts available to all Company employees -- e.g., discounts offered by the Downtown Athletic Club. This type of program is offered to media and non-media companies on the same basis and is therefore acceptable. However, discounts of this sort may create the appearance of a conflict in certain circumstances, particularly if the discount is offered to a staff member responsible for the coverage of the company offering the discount. ~~If a staff member has any concerns about an apparent conflict of interest relating to these programs, he or she should consult their supervising editor.~~

B. RELATIONSHIPS

Staff members must avoid ~~actual or apparent~~ conflicts of interest arising out of relations with relatives, friends and institutions. Staff members should not write about, photograph or make news judgments about any individual related by blood or marriage. This prohibition includes all aspects of our coverage, including obituaries. **Editors should not assign, directly supervise or edit articles or photographs of family members of close friends.** Similarly, staff members should generally not play a role in The Sun's coverage of people with whom they have a close personal or financial relationship. ~~To ensure the newspaper's impartiality, staff members should disclose their relationships with people or organizations they make news judgments about to their supervising editor before any such coverage appears in The Sun.~~ **If you find yourself in a situation where you think you might be in conflict with this, disclose it to an appropriate Editor.**

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Staff members should be particularly careful to avoid any appearance of partiality when writing, editing, assigning or otherwise participating in stories that involve their immediate world – their children's schools, their neighborhoods, their religious institutions, for example. ~~Once again, early disclosure of the personal connection to a supervising editor is essential.~~ In some cases, disclosure to readers will be appropriate, particularly when the personal connection is the story a columnist writing about her children, a feature writer telling a tale about a family member or friend.

Staff members should seek guidance from their supervisors about whether it is appropriate to write stories about Sun employees (in non-Sun related matters) or their relatives, or even to include them in stories. We will be careful to report immediately and fairly when a Sun colleague has a serious encounter with the legal authorities. There ought never be the suggestion of a cover-up to keep the spotlight off ourselves when we would have focused it on others in similar circumstances. We should cover The Sun, Tribune Company and its business units as we would any other company. **If anything, we should give more scrutiny to The Sun, Tribune Company and its business units than we do other companies.**

C. CONFIDENTIALITY

If you learn something sensitive and confidential in the course of your job - whether it's from a source or from a colleague about an unpublished story - do not tell anyone outside of The Sun, except if it is necessary in the course of normal newsgathering operations or by law.

~~Sensitive information and material obtained by a staff member in connection with his or her employment is to be treated as confidential and not disclosed to anyone outside The Sun. Such information includes not only our own work and that of colleagues, but also information relating to future activities, as yet unpublished news and material that was reported but ultimately not included in articles.~~

D. ADMISSIONS AND TRAVEL

We avoid freebies, junkets and subsidized travel; whenever possible, we pay our own way. Staff members assigned to cover spectator, sporting or entertainment events may use such facilities as review seats, press boxes, press rooms and photo galleries. If no seats are set aside for working press, The Sun will pay for admission for staff members who are covering the event. Staff members must be scrupulous to avoid seeking or accepting free admission to events for personal benefit, except if free admission is available to the general public. Therefore:

- It is improper for staff members to seek or accept free admission to events they are not involved in covering, **using for research, or source building.** That means a columnist, for example, cannot justify accepting

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free tickets to a concert by saying he/she might someday write about it. Similarly, the free movie passes that come to the newsroom fall into the "Gifts" category of this policy and should not be utilized except by staff members who are covering the event.

- Staff members should not seek or accept access to press boxes or free admissions for their families or friends.

Staff members should not use their position at The Sun to purchase tickets to an event that are otherwise unavailable to them as members of the public or accept special offers aimed at members of the news media for personal use, even if the staff member would be paying the box office price. For example, a staff member should not solicit or accept an offer from a publicist promoting a sold-out show at the Hippodrome to purchase a ticket unless the staff member is attending the show because of his or her job responsibilities.

Generally speaking, working staff members don't pay admission to ordinary news events--speeches, lectures, conferences, conventions, etc. where press coverage is expected and often invited. This is particularly important when events are sponsored by partisan organizations with a legislative or regulatory agenda. The Sun and its staff members **with newsgathering or editing responsibilities** will not purchase tickets to political fundraisers because to do so makes The Sun a campaign contributor, and listed as such in public documents. If the organizers of such events won't allow a reporter entry without a ticket, we would not attend and would find other ways to cover the event if warranted.

When The Sun determines that travel will be necessary to the performance of a staff member's professional duties, these expenses shall be paid by The Sun, even if the transportation is provided by government or military agencies. If a staff member takes a charter flight with a political campaign, for example, he/she must make arrangements to pay his/her share. In emergency situations, staff members should use common sense to ensure that The Sun gets the story. For example, if the only access to a disaster or military action is by military helicopter, a staff member trying to cover the story should use the transportation ~~and inform a supervising editor as soon as possible~~. If possible, arrangements for payment will then be made.

E. MEALS AND OTHER EXPENSES

Again, follow the simple rule of seeking or taking nothing that is not available to everyone. Pay for your own meals. If a news source buys you a soda, try to return the courtesy. Only accept a meal if you know you can soon buy one in return. If food is available to all at an event, when appropriate pay for it. Always remember that the rules are stricter when politics is involved. It is one thing to take a Coke when they are available for all at a community group's announcement of its latest project, but it is

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quite another to do that at a political fund raiser. Don't. Never take anything from a politician.

Occasionally, it might be socially awkward or logistically difficult to refuse or pay for a meal. You might insult a farm family you have spent the day with if you refuse an offer of lunch. Or if you go to interview a group who are not used to dealing with the press and they have put out pastries for everyone there to enjoy, there is no need to act as if they are trying to bribe you. Think about how your conduct appears to others. If you are doing anything that brings your integrity, or the integrity of The Sun into question, don't do it.

~~As with travel, it is always better for a staff member to pay for his or her own meals. Occasionally, a news source may buy a staff member a beverage. This is harmless if it is a simple courtesy. The staff member should take the next opportunity to repay the courtesy. But staff members should avoid eating for free at events they are covering—including political fundraisers, sporting events, society or arts events, press conferences and dinner speeches—even if the sponsors of the event encourage the staff members to enjoy the meal. Eating free at such events may raise questions about The Sun's impartiality or integrity. If staff members do eat at those events, the staff member should arrange for The Sun to reimburse the sponsor for the meal(s). (This can typically be done discreetly the next day.) If reimbursement is refused, The Sun will make an appropriate donation to charity and notify the sponsoring organization that it has done so. Staff members may encounter rare situations in which it may be socially awkward or logistically difficult to refuse or pay for a meal. For example: a reporter is interviewing a farm family all day and is invited to lunch with the family in the kitchen. Refusing may be interpreted as an insult. Under such circumstances, the reporter may accept the lunch, but the next meal (if any) shared with the family should be at The Sun's expense. In all such cases, staff members should carefully consider the question of how the journalist's conduct might appear to others.~~

F. GIFTS

Again, do no use your position for any personal gain. Do not solicit merchandise, cash, services or other gifts in connection with your work. Do not accept--for you or your family -- gifts, ~~Staff members should never solicit merchandise, cash, services or other gifts in connection with their work. Staff members and their families may not accept gifts, including free tickets, memberships and use of facilities, or any other favors, from news sources or individuals or organizations covered by The Sun or likely to be covered by The Sun. Buying premium tickets at face value from such sources is also prohibited unless they are generally available to the public. (For example, choice sports event seats controlled by a lobbyist or corporation.)~~

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~~Gifts of valued at less than \$10— may be accepted, though~~ **While you don't have to return every pen or ruler or bookmarker --\$30 is a good baseline for the value of gifts that can be retained** – staff members are strongly encouraged to discard them or donate them to charity. All other items are to be returned to the source with the explanation that accepting gifts violates The Sun's policy. When it is impractical to return a gift, including food items sent to The Sun, it should be given to charity and the sources advised of the reason.

Similarly, staff members and their families **should be careful about forming relationships --that could include gift giving -- with individuals or organizations that The Sun covers. If a reporter has spent weeks working with a family-- basically intruding on their personal life –there is nothing wrong for that reporter to give, say, a bouquet of flowers as a means of saying "Thank you." When in doubt, communicate and consult.**

~~Similarly, staff members and their families should not provide gifts to news sources or individuals or organizations that The Sun covers. Though these gifts may seem entirely innocent, they create a serious risk that readers or other members of the community will perceive them as tokens of affection or esteem; this may be taken as an indication that The Sun's coverage is not impartial or credible.~~

Books, videos, software, recordings and other similar review materials may be kept by the person reviewing them. Staff members are not permitted to sell review copies for any reason. Materials deemed useful references may also be retained but they remain property of The Sun and should not be ~~taken home or~~ sold by any staff member. All other items sent to The Sun or its staff members, including wine, should be deposited in an area identified for donation to a charity designated by The Sun.

G. COMPETITIONS, CONTESTS AND AWARDS

The Sun is careful in submitting staff entries for recognition and awards to limit participation to those contests whose central interest is recognition of journalistic excellence. It makes every effort to avoid those contests that exist primarily to publicize or further the cause of the sponsoring organization. ~~For that reason, those staff members who would like their work entered in a contest must receive the approval of their supervising editor.~~

By the same token, any staff member offered an award, monetary or otherwise, from any person, company or organization, including such groups as journalism, college, medical or bar associations, should notify their supervising editor and receive approval before accepting. In that manner, we can best ensure that there will be no appearance of undue influence. Staff members who receive awards that are not approved because the sponsoring organization does not meet the standards of this policy should decline to accept the award.

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Staff members may not take part as judges or contributors in competitions that exist primarily to publicize or further the causes of the **commercial or partisan** organizations sponsoring the contest. ~~Participation in these events makes The Sun a part of the event being covered and may raise questions about our independence. This prohibition covers all competitions in which critics, sportswriters and other staff members are invited to vote, including: most valuable player, all star and rookie of the year honors; admission to halls of fame; industry awards, such as the Tony Awards; and local arts award ceremonies.~~

H. OUTSIDE ACTIVITY

The newspaper's reporting must always be objective and detached. The public's perception of the newspaper is important, and the activities of staff members must never compromise or appear to compromise the paper's independence, integrity or credibility. ~~It is often difficult to discern which activities will present a perceived or actual conflict. Therefore, this Code requires disclosure to supervisors of any ongoing or proposed activities, relationships, dealings or investments that could damage the credibility and integrity of The Sun or conflict with its interests. The Code further requires approval of those activities. Keep in mind that The Sun reserves the right to withdraw its prior approval for any outside activity at any time.~~

(1) Civic and Political Activity

~~Generally, staff members will receive approval to participate in civic, charitable, religious, social or residential organizations, so long as they are not involved in an organization or issue that he or she covers or supervises. **The rule of thumb here is that the farther the activity is away from the staff members' area of journalistic responsibility, the less likely it is to be a problem. Since there are many people in the newsroom who have no journalistic responsibility -- editorial assistants, copy persons, and the like -- there are no restrictions on their participation in these areas. For those involved in journalism, common sense should let you know if there is any problem with your activity.**~~ For example, a medical reporter may join a PTA; the national editor may join a neighborhood association; a state political writer may be a Big Brother or Big Sister. ~~These community organizations do not typically generate news coverage in The Sun. In assessing these activities, staff members should remember that the farther the activity is from their area of journalistic responsibility, the less likely it is to be a problem.~~

No staff member **with newsgathering or editing responsibilities** should contribute money to, or raise money for, any political candidate or election cause. Given the public's easy access to information from public records, campaign contributions create a substantial risk that readers will improperly conclude that The Sun and its staff members are partial.

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Staff members **involved in newsgathering and editing** should also avoid active involvement in partisan causes -- politics, community affairs, social action demonstrations -- that could compromise or could seem to compromise the paper's ability to report and edit fairly. Because such activities can create a perception, intended or not, of partiality on the part of the newspaper, **those** staff members and **Baltimore Sun executives** may not:

- seek public office;
- campaign for or endorse candidates, partisan political organizations or campaigns, including those seeking legislative or regulatory change; serve on government bodies; ~~sign petitions;~~
- wear political buttons, display **political** bumper stickers or campaign signs or;
- ~~publicly espouse a cause or participate in a demonstrations.~~

Remember that though these restrictions do not apply to your family, their involvement in civic, political or professional activities could create at least the appearance of a conflict. Keep this in mind when considering beats or story assignments. Communicate any potential problem.

~~The Sun recognizes that the legitimate civic, political and professional activities of spouses, companions and other relatives can create journalistic conflicts or the appearance of a conflict. While The Sun does not wish to interfere in the private lives of its staff members' family and friends, there may be circumstances in which a staff member's beat, assignment or job may be restricted or changed to avoid concerns that may arise as a result of such a conflict. When a potential conflict of this sort arises, staff members should discuss the situation with a supervising editor immediately.~~

Fundraising for any organization or cause no matter how worthy, also has the potential to create a conflict of interest or the appearance of one. The rule of thumb is that staff members should not engage in or lend their names to fundraising efforts, even if their Sun connection is not explicitly mentioned. Certainly, news and editorial employees must never solicit people, companies or foundations covered by the newspaper for cash contributions or any other kind of assistance. This prohibition on fundraising is not meant to exclude such things as taking the collection at church or selling cookies or candy. Nor is it designed to preclude employees from seeking money from foundations such as McCormick/Tribune or similar groups for fellowships or other legitimate journalistic initiatives. Any other fundraising activity requires specific approval from the Editor, Managing Editor or Editorial Page Editor.

No newsroom or editorial employee should permit their Sun affiliation to be noted in any outside organization's materials; what may be intended only as identification is all too easily misread as an association with The Sun. Exceptions to this policy include situations in which staff members serve as representatives of The Sun or when the notation is simply a biographical reference in materials

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for an organization that has no partisan or lobbying agenda--e.g., a Sun staff member might serve on his college advisory board or serve as a recruiter and be identified as a Sun editor on some college materials. **This prohibition does not apply to professional associations, such as National Association of Black Journalists or Education Writers Association.**

2) Memberships

In general, don't join partisan organizations with political and/or lobbying agendas. We do not want the names of Sun reporters and editors showing up on these membership lists. The problem is that virtually every organization can fall under that umbrella. Therefore, avoid those that impact your primary area of journalistic responsibility. The AAA lobbies for more roads, the AARP for Medicare reform, your local bicycle club for more bicycle lanes. So again, the further away from your area of responsibility, the better. The AAA would not be a problem for almost anyone, but if you are covering transportation and regularly talking with their spokesperson, you might take another look at your membership. In any case, avoid making extra contributions specifically for lobbying efforts and, when in doubt, consult.

Nothing in this section should be construed as limiting your participation in legitimate religious groups even though many churches and faiths have active political agendas.

~~Staff members are not permitted to join partisan organizations with political and/or lobbying agendas—even for the sole purpose of receiving their literature—because to do so lists the newspaper and/or staff members as members of the organization and supports its work. There may be rare exceptions but they must be approved in advance by the Editor, Managing Editor or Editorial Page Editor.~~

(3) Endorsements

~~Under no circumstances should~~ Staff members **should not** make endorsements or participate in broadcast commercials, web promotions or print advertisements for products or enterprises other than The Sun **unless it is apparent that the employee is not speaking on behalf of The Sun** ~~without the consent of the Editor, Managing Editor or Editorial Page Editor.~~ **In no circumstances should staff members make such endorsements in a primary area of their area of journalistic responsibility.**

(4) Outside Employment, Freelancing and Speaking Engagements

Employees shall be free to engage in any activities outside their normal working hours, which do not constitute service for any interest or publication in competition with the publisher. No employee, without permission of the Publisher, shall use in the course of such activities any

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material or featured title of the Publisher or exploit in any way the employee's connection with the Publisher.

~~Any outside employment, freelancing or speaking engagement that would create conflicts of interest for The Sun should not be undertaken. The conflict presented by some activities is apparent. Staff members may not do public relations work or otherwise advise individuals and organizations who could be the subject of coverage in The Sun. Similarly, staff members may not work for or contribute to projects associated with or commissioned by individuals, companies or organizations they might cover or participate in news judgments about. For instance, a sportswriter would not be permitted to ghostwrite an autobiography for a football star he covers because that activity would establish a relationship between the journalist and the player that might call the staff member and The Sun's impartiality into question.~~

~~Outside employment, freelancing and speaking engagements are only permitted when supervising editors determine they do not constitute a conflict of interest or otherwise interfere with the performance of a staff member's job. Any outside employment, freelancing or speaking engagement should therefore be disclosed to supervisors to ensure there is no conflict or perceived conflict. To ensure that supervisors have the opportunity to consider these endeavors carefully before deciding whether to grant permission, all staff members must disclose each such arrangement: (a) to the editor hiring the staff member upon receipt of an offer of employment; and (b) to their supervising editor before undertaking any outside employment, freelance project or speaking engagement. In addition, staff members are required to disclose these activities in the attached form (Appendix A) on an annual basis.~~

Print and Online

~~Generally, staff members will be permitted to undertake freelance writing, photography, illustration or editing for publications that are not in competition with The Sun. However, staff members will not be permitted to pursue activities that might compromise the integrity of the newspaper or create an appearance of partiality.~~ **Freelance writing, photography, illustration or editing for publications that are not in competition with The Sun are fine. However, you should not, of course, pursue activities that** compromise the integrity of the newspaper or create an appearance of partiality. For example, staff members may not write for publications, whether in print or online, where the content is controlled by an organization **we** you cover, such as Major League Baseball or Legg Mason, or a partisan organization, such as the National Rifle Association.

In the age of the World Wide Web, it is possible for virtually any publication to be deemed as in competition with The Sun, if not for advertising, for the eyeballs of readers. But there is no intent to limit your work for publications that are clearly not going after the same readership that The

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Sun seeks on a daily basis. Do keep in mind though, that, while they may not be in competition with The Sun, websites, chat rooms and blogs-- even a personal websites could be construed as calling into question your or the newspaper's integrity. So be careful about your participation in such enterprises.

~~All companies that publish news or information on the World Wide Web are by definition in competition with The Sun for readers and advertising dollars. Even A staff member's personal Web site of almost any nature could be seen as competition to The Sun and its affiliates' various online offerings, so proposals will be examined closely before permission is granted. Some interactive offerings will be readily permitted -- e.g., a personal site containing family news and pictures. Others, including websites, chat rooms or blogs that compete with The Sun's products and services, violate the newspaper's standards or threaten its credibility, will not be permitted.~~

~~Work that evolves directly from Sun assignments and beats may not be offered to other publishers, broadcasters or websites without prior permission from the Editor, Managing Editor or Editorial Page Editor. **The Sun has the right of first refusal on work that evolves directly from Sun assignments and beats. Without permission,** staff members may not use any Sun supplies, materials, equipment, content (including outtakes) or other materials in the course of any outside employment or freelance effort.~~

Speaking Engagements and Broadcast Appearances

~~Typically, staff members will receive permission for outside Speaking appearances at events or forums sponsored by educational or not-for-profit groups whose main focus does not include lobbying or political activity **are almost always acceptable, as is** speaking before college classes, booster clubs, religious groups, book clubs, journalism organizations, civic or community organizations or parent groups, for example, is almost always acceptable. **Again, simply ask if the appearance in any way calls into question your or the newspaper's integrity and, if there is any doubt, consult.**~~

~~No staff member may participate as a speaker or panelist before any outside organization where participation would create an actual or apparent conflict of interest or undermine public trust in the staff member or Sun's impartiality.~~

~~As long as the staff member's supervising editor is satisfied that the group making the invitation falls safely within the guidelines contained within this policy, staff members may accept reimbursement of travel expenses and a reasonable fee or honorarium for a speaking engagement. Staff members' immediate family or household may not accept payment as part of the arrangement. ~~To ensure that the supervisor's decision is fully informed, the staff member will disclose all financial arrangements at the time he/she seeks approval of the speaking engagement.~~~~

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On occasion, ~~the newspaper may authorize~~ speeches to special interest groups – trade or professional associations, business groups or individual companies – **may be allowed** when the appearance does not conflict with the spirit of this policy. All such requests must be authorized by either the Editor, Managing Editor or Editorial Page Editor. In these cases, staff members will typically not be permitted to accept any fee or honorarium.

Even if an invitation comes from a group that falls within the guidelines of this policy, staff members should be sensitive to an appearance of impropriety if it is a group whose interests they cover directly, or whose coverage they edit or supervise. ~~While The Sun does not intend to ban outright such appearances, staff members must receive permission from either the Editor, Managing Editor or Editorial Page Editor before agreeing to accept such an engagement. In these cases, staff members will typically not be permitted to accept any fee or honorarium.~~ Honoraria should not be accepted in these circumstances.

~~Radio or television interviews, broadcast panels, appearances or programs, paid or unpaid, shall be treated as freelancing under this policy, except when the appearance is made at the request of the Editor, Managing Editor or Editorial Page Editor as part of The Sun's multimedia efforts.~~ In choosing whether to seek permission to appear on a broadcast **appear on a Radio or television interviews, broadcast panels, appearances or programs broadcast**, staff members should be mindful of the tone and content of the program and the role they are to play, to ensure that any appearance they make is in keeping with the journalistic standards of The Sun. ~~As a rule of thumb, staff members should not say anything on any program that they would not be allowed to publish in The Sun.~~ In particular, staff members should avoid saying anything that could compromise the newspaper's standards or reputation for accuracy, fairness and balance.

Generally, staff members must be identified as employees of The Sun in all speaking engagements or broadcast appearances. This rule would not apply if a staff member is speaking because of expertise in an outside interest. A photographer, for example, might be an orchid expert; there is no need to mention her Sun affiliation when speaking to the Orchid Growers Association.

(5) Scoops, Exclusives, and Breaking News

If you recognize that something is newsworthy, even if it is not on your beat, you should tell the appropriate people at The Sun. You should not give any such information to another organization without authorization.

~~If a staff member obtains news, information or other material that might be published, distributed or broadcast by The Sun, the staff member should notify his supervisor immediately, whether the information relates directly to the staff~~

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~~member's regular beat or not. Staff members are forbidden from providing such material to any company or endeavor other than The Sun without approval from their supervising editor.~~

(6) Investments and Personal Business Activities

As journalists, our personal investing activities must not compromise our objectivity and our ability to report on a subject fairly and accurately. To that end, reporters, writers and editors, especially those who cover business or who impact our business coverage, may not own stock or other securities in companies or industries they are likely to write about or supervise coverage of as part of their usual assignments. There is one exception to this rule: it may be necessary for business reporters or editors to own a single share of a company's stock to permit immediate access to shareholder information. This type of arrangement should be pre-approved by the Assistant Managing Editor/Business or the Managing Editor.

To further elaborate on the stock ownership rule, a financial reporter or editorial writer, who covers the banking industry, should neither own stock in Mercantile Bankshares Corporation, which is a local company, nor in any other financial institution. If a staff member owns stock in a company he/she is not routinely assigned to cover and one day is chosen to write or edit a story about that company or its industry, he or she must discuss the matter with a supervisor before undertaking the assignment.

Sometimes, a change in assignment might create problems. For example, a banking reporter might own stock in Target, which is not a bank or a Maryland company. If that reporter were reassigned to retail, he or she should tell an editor about the potential conflict. If the Sun believes a conflict existed, and divestiture of the Target stock would create a financial hardship, the Sun would make the reporter whole after he sold the stock, or the reporter could decline the assignment.

No one expects staff members to monitor the daily transactions of their mutual funds. In general such investments will never be cause ethical questions as they are a way for journalists to distance themselves from investment decisions. However, in certain instances, so-called "sector" funds that concentrate on a particular industry may not be appropriate investment vehicles for those involved in the coverage of that or similar industries.

No staff member should buy or sell individual stocks or other securities based on advance knowledge of an article or editorial that will be published in The Sun.

Staff members are forbidden from using "insider information" as an investing tool. Staff members should keep in mind that information obtained in connection with

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their job that has not been publicly disclosed is "inside information". This information may include information relating to acquisitions, mergers, divestment, stock splits, dividend rates, earnings, major management changes, expansion plans and other important developments.

Staff members must recognize that the investments and business interests of their spouses, family members and domestic partners may also create actual or apparent conflicts of interest **and be aware of those as much as possible**. ~~Therefore, staff members shall be responsible for ensuring that the business activities of their spouse, immediate family and/or domestic partner do not violate the letter or spirit of this section of the Code. If any conflict exists or arises, the affected staff member must disclose the circumstances to a supervising editor immediately.~~

(7) Gambling

In general, you should not gamble on events you are covering. But don't worry about office pools designed to reward predictions on election outcomes or the NCAA basketball tournament. Use your common sense.

~~To avoid any appearance of bias, no staff member may gamble on any event they are covering. This prohibition does covers wagering of all sorts, whether legal or illegal, friendly or serious.~~

2. TRUTH, INTEGRITY, AND ACCOUNTABILITY

The Sun's business is to seek and report the truth with the appropriate context and perspective to make it relevant, useful and interesting to the public. The accuracy of our information — whether text, pictures, audio or graphics — is essential to our success. Invented material has no place in The Sun, except in cases in which fictional material is identified as such. Fabrication of names, quotes, events or descriptive details is forbidden.

A. PHOTOGRAPHY AND GRAPHICS

In ~~Features~~ **some** sections, such as entertainment, fashion or cooking, it is commonplace and acceptable to stage illustrations or manipulate images. Whenever appropriate, readers or viewers should be alerted in those instances, usually with nothing more than a small caption that says "photo illustration."

Images in our news pages, however, must be genuine. Nothing may be altered, rearranged, reversed, distorted or removed from a scene, except for the recognized practices of cropping, dodging, burning and toning, without the approval of an assistant managing editor. The guidelines for fair and accurate reporting should be the criteria for judging what may done digitally to a

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photograph. **While portraits and other arranged photos are fine, breaking news events should not be set up, recreated or re-enacted.** The public must always know that to the best of our ability we are reporting news events exactly as they occurred or appeared.

B. QUOTES

Quotes should not be altered. **To the best of your ability-- and note-taking skills-- the words inside quotation marks should be the words that come out of peoples' mouths. Ellipses, brackets and paraphrases can be used if an exact quotation misrepresents the speaker's intent or makes them look foolish unnecessarily. If the person is speaking through a translator—or replying to a question via email -- that should be noted in the text.**

~~Quotes should not be altered. We should not clean up anyone's language or distort the speaking style of the person quoted. (If a quote includes an objectionable word, it should be used only when the news value of the story depends on it.) Among the reasons we discourage correcting grammatical mistakes or otherwise modifying quotations is that in this age of 24-hour news, our readers can see quotes in our paper and realize they are different from what is coming out of the speaker's mouth on television. This erodes our credibility.~~

C. BUSINESS CONSIDERATIONS

Our integrity may be damaged if The Sun fails to distinguish clearly between news/editorial content and advertising content. It is appropriate for The Sun's departments to work together to build the company's financial strength, but never in a way that would jeopardize the integrity of our news coverage. The News and Editorial departments' mission is to pursue the truth accurately and fairly, even if doing so may adversely impact the newspaper's advertising revenue.

D. ATTRIBUTION AND PLAGIARISM

When we use facts gathered by other news organizations, we attribute them. This policy applies to material from newspapers, magazines, news agencies, books, broadcasts and on-line news services. General information available from multiple sources need not be credited. But news material available only from a single source must be credited.

Staff members must not use anyone else's work and present it as theirs. That means we do not **knowingly** use anyone else's reporting, language, analyses or interpretations – even if it's just a phrase or two -- unless they are clearly attributed. ~~When in doubt, consult a supervising editor or the Public Editor.~~ **Nor should you repeat a substantial part of your own previously published work without noting that.**

E. BREAKING THE LAW

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Breaking the law in pursuit of a story is not allowed even if the end appears to justify the means. Taking documents off a desk is theft. Hacking into a computer to obtain information or accessing voice mail recordings without authorization is illegal. So is breaking and entering. Many of the states we report in forbid electronic eavesdropping or clandestine tape recording of conversations.

Staff members should not engage in illegal activities and editors should never encourage illegal behavior of any kind, although some minor infractions such as traffic violations, double-parking or technical trespass are likely to occur in everyday news coverage.

F. MISREPRESENTATION

Except in highly unusual circumstances, staff members will not misrepresent their identity in gathering news. Identifying yourself as someone or something you aren't, donning costumes like doctor's coats or military uniforms or taking a job to see an organization or institution from the inside is not permissible without prior approval from the Editor and Publisher.

There are occasional exceptions. A restaurant critic, for example, must adopt a false identity to do the job successfully. But reporters who contact news sources with the intention of gathering material for a story should be upfront about who they are and what they are doing. Impersonating someone else to get information is wrong. So is pretending to be part of an authorized group to gain access to a closed area like a government building or hospital ward.

On the other hand, if a reporter or photographer pursues an assignment in circumstances already open to the general public, there is no obligation to identify one's self unless asked. Reporters may remain silent to observe an institution's dealings with the public, or the behavior of people at a public event. If questioned at such events, reporters must properly identify themselves as journalists unless it would compromise their safety. (Such exceptional circumstances might include a foreign correspondent operating in a volatile, belligerent situation.)

G. CORRECTIONS

The Sun strives to be as fair and accurate as possible in its news coverage, and recognizes an ethical responsibility to correct all its factual errors. The newspaper's credibility can be damaged if it doesn't correct mistakes quickly, or gives the impression of covering them up.

~~Any error that could require correction or clarification should be relayed to a supervising editor and investigated promptly. The supervising editor should promptly notify the appropriate assistant managing editor of any potential error of fact or context. The Public Editor also will be investigating questions from readers~~

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~~about possible errors and will contact supervising editors to investigate those questions.~~ Fairness demands that a correction or clarification be published as soon as is practicable.

A correction, like any other article published in The Sun, should be clear and complete. Corrections represent the official voice of the paper and, therefore, should be written carefully and in full context. Each correction must make sense to all readers, even those who have not seen the original item. To accomplish this, the correction must establish enough context for the reader to understand what was wrong and exactly what The Sun is correcting. If that means repeating the original error, repeat as much of the original error as is necessary, so long as you identify it as erroneous.

Whenever practicable, the correction should state the origin of the error. Because a reporter is assumed to be the source of any mistake in the text of a story, it is only fair to describe mistakes as editing errors when that is the case. The reporter is the only named person linked to the mistake; when he/she is not at fault, it is in the newspaper's interest to protect his/**her** credibility.

~~Each correction is to be reviewed by the Assistant Managing Editor of the appropriate department and, whenever possible, the Public Editor before it moves to the copy desk. Before publication, each correction must be approved by either the Editor, Managing Editor, Public Editor, copy chief or, where appropriate, the Editorial Page Editor (or a designee).~~

3. IMPLEMENTATION

The purpose of this Code is to illuminate a set of professional standards that should help all of us in our never-ending effort to protect the credibility of The Sun. **Sufficient training will be provided so that** every staff member will be familiar with its terms and to comply in all respects. ~~To ensure careful compliance and to assist in the identification and review of any potential issues, staff members will complete and submit the attached form annually to the Editor.~~

~~Any staff member who violates any provision of this policy will be subject to disciplinary action, up to and including termination. Ignorance of the Code is no excuse.~~

There may be some areas of overlap between Parts II and III. In the event of any conflict between the provisions of this Part III and the General Provisions of Part II above, the provisions of this Part III shall govern for News and Editorial Department employees.

Any questions about which provisions govern should be raised with your supervising editor or the Vice President for Human Resources and Legal Affairs.

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Finally, since readers do not distinguish between content provided by staff members and material created by freelancers, editors and other staff members should do their best to ensure that freelance contributors adhere to the standards of this Code. While these contributors are not employees of The Sun and therefore are not subject to discipline, contributors who violate this Code may be denied further assignments.

PART IV. COMPLIANCE

~~All employees are required to complete and sign the Statement of Compliance with The Ethics Code (attached as Appendix A) once each calendar year by the date selected by the Publisher.~~

Any employee who violates any provision of this Code may be subject to disciplinary action, up to and including termination. Employees who have questions concerning the Code or become aware of a possible violation of the Code should promptly contact their supervisor, the Vice President for Human Resources and Legal Affairs or, alternatively, should follow the guidelines described in Part II.12 of this Code.

PART IV. TRAINING

Prior to implementation of this policy, the Sun will provide training to all current employees. The Sun will share proposed training materials with the Guild at least forty-five (45) days prior to scheduling of the first training session, and will meet with the Guild to discuss and revise the training program. All newly hired employees will receive Ethics Policy training within two weeks of date of hire. In addition, The Sun will at least annually conduct an educational program on the Ethics Policy, utilizing direct experiences at The Sun and other newspapers to assist employee in understanding and adhering to ethical standards.

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APPENDIX A

STATEMENT OF COMPLIANCE WITH THE ETHICS CODE

I have received and read the Company's Ethics Code and I agree to comply with its provisions. I also affirm that my answers to the following questions are true and correct to the best of my knowledge. I understand that any intentional omission or misrepresentation of information on this form may result in disciplinary action, including termination.

If the answer to any question is yes, describe below or on an attached sheet. Even if you have disclosed an incidence in prior years, you must disclose it again, if still applicable.

The first page of the Statement of Compliance must be completed and signed by all employees. News Department and Editorial Department employees must also complete and sign page 2 of the Statement of Compliance.

1. Have you violated any provisions of the Code? If yes, please describe.

Yes No

2. Are you aware of any actual or possible conflict of interest (as described in Part II.5 of the Code) involving you or a closely related family member? If yes, please describe (e.g., if you have a significant personal interest in a competitor, supplier, advertiser or customer, describe fully the interest and any transactions between such entity and the Company of which you are aware).

Yes No

3. During the last twelve months, were you employed by, or did you act as an independent contractor, representative or agent for an entity other than the Company? If yes, describe your responsibility to the other entity. Exclude activities prior to beginning employment with the Company. For News and Editorial Department Employees, include freelance work or assignments and speaking engagements.

Yes No

4. During the last twelve months, did you accept any single business gift, purchase discount or other benefit with a value in excess of one hundred dollars (for News Department and Editorial Department employees, respond if the value is in excess of ten dollars)? If yes, describe the gift, discount or other benefit and provide the estimated value.

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Yes No

5. During the past five years, have you been convicted or pleaded guilty in a criminal proceeding (excluding minor traffic violations)? If yes, please describe.

Yes No

Name (print or type) Signature

Position Date

Department Phone Number

STATEMENT OF COMPLIANCE WITH THE ETHICS CODE

This page is for completion by News Department and Editorial Department employees.

Please list any memberships, investments, outside employment, activities, endeavors, or any other interests you have that might give rise to a conflict of interest under Part III of the Ethics Code (Newsroom and Editorial Department Ethics).

I have read the foregoing Ethics Code and, other than the matters disclosed above, I am not involved in any memberships, investments, endeavors or activities that might give rise to any conflicts of interest or the appearance thereof. I certify that I am in compliance with the standards set forth in the Ethics Code.

Name (print or type) Signature

Signature

Position Date

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