

Appendix 2.

4.4 EDITORIAL POLICY

Issue No. 3 dated 25/01/2007

Ethical integrity is the cornerstone of our editorial policy. It is the principle by which we run all our papers, whether they be paid-for or free. Our papers must also be edited on the basis that they are intended to be read by whole families, and content must reflect this.

Within normal commercial constraints including planned editorial/advertising ratios and limitations on colour, the Group operates a policy under which the editor has freedom to edit without interference from general management, although this does not preclude management from making its views known. The editor is legally responsible for the entire content of the products he or she edits, including advertising. He or she is similarly responsible for the fairness and accuracy of all content. If errors occur, they must be corrected promptly and with the appropriate apologies, subject to legal requirements.

When deciding copy tasting priorities, editors should encourage audience interactivity, take into account any research from focus groups, be aware of relevant social and cultural trends, pursue reader feedback in whatever form it is received and take full advantage of the opportunity presented by reverse publishing.

Editors are expected to publish newspapers which reflect the interests of the communities they serve. Since the vast majority of our titles seek to appeal to entire local communities, the general rule is that editors and their staff should follow an issue-led agenda, avoiding overt and sustained political bias. Those of our newspapers which have a long established tradition of reporting the outlook and perceptions of a particular section of the local community are expected to maintain their broad editorial stance.

Editors must ensure that they and their staff follow the current Code of Practice as set out by the Press Complaints Commission.

Editors are expected to make managing directors and senior commercial managers aware, in advance of publication, of any articles they believe may have an adverse commercial impact on the business. This is in the interests of good internal communications only, and does not over-ride the preceding point on editorial independence.

It is also Group policy that our newspapers make no mention of any competitor except in the context of a genuine news story. In particular, it is strictly contrary to Group policy for any newspaper to indulge in "knocking copy" relating to competitors.