

EXHIBIT JR 2



PRINCIPLES OF ETHICAL NEWSGATHERING
Newsquest Media Group Guidance

For legal advice and further guidance on the application of these Principles, contact Newsquest Media Group's In-house lawyer, Simon Westrop, at:
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These guidelines are based on the guidelines on ethical newsgathering conduct issued by the Newspaper Division of Newsquest's US parent company Gannett Co., Inc. They consist of five ethical principles and their supporting objectives accompanied by recommended practices to protect the principles.

The five principles are:

- Seeking and reporting the truth in a truthful way
- Serving the public interest
- Exercising fair play
- Maintaining independence
- Acting with integrity

I. PRINCIPLES OF ETHICAL CONDUCT FOR NEWSROOMS

NEWSQUEST MEDIA GROUP PUBLICATIONS ARE COMMITTED TO:

Seeking and reporting the truth in a truthful way

We will dedicate ourselves to reporting the news accurately, thoroughly and in context.

We will be honest in the way we gather, report and present news.

We will be persistent in the pursuit of the whole story.

We will keep our word.

We will hold factual information in opinion columns and editorials to the same standards of accuracy as news stories.

We will seek to gain sufficient understanding of the communities, individuals and stories we cover to provide an informed account of activities.

Serving the public interest

We will uphold the freedom of the press the better to serve the democratic process.

We will be vigilant watchdogs of government and institutions that affect the public.

We will provide the news and information that people need to function as effective citizens.

We will seek solutions as well as expose problems and wrongdoing.

We will provide a public forum for diverse people and views.

We will reflect and encourage understanding of the diverse segments of our community.

We will provide editorial and community leadership.

We will seek to promote understanding of complex issues.

Exercising fair play

We will treat people with dignity, respect and compassion.

We will correct errors promptly.

We will strive to include all sides relevant to a story and not take sides in news coverage.

We will explain to readers our journalistic processes.

We will give particular attention to fairness in relations with people unaccustomed to dealing with the press.

We will use unnamed sources as the sole basis for published information only as a last resort and under specific procedures that best serve the public's right to know.

We will be accessible to readers.

Maintaining independence

We will remain free of outside interests, investments or business relationships that may compromise the credibility of our news report.

We will maintain an impartial, arm's length relationship with anyone seeking to influence the news.

We will avoid potential conflicts of interest and eliminate inappropriate influence on content.

We will be free of improper obligations to news sources, newsmakers and advertisers.

We will differentiate advertising from news.

Acting with integrity

We will act honorably and ethically in dealing with news sources, the public and our colleagues.

We will obey the law.

We will observe common standards of decency.

We will take responsibility for our decisions and consider the possible consequences of our actions.

We will be conscientious in observing these Principles.

We will always try to do the right thing.

II. PROTECTING THE PRINCIPLES

No statement of principles and procedures can anticipate every circumstance that may arise. Fundamental principles sometimes conflict. Therefore these recommended practices cannot establish standards of performance for journalists in every situation.

Careful judgment and common sense should be applied to make the decisions that best serve the public interest and result in the greatest good. In such instances, journalists should not act unilaterally. The best decisions are obtained after open-minded consultations with appropriate colleagues and superiors – augmented, when necessary, by the advice - from Newsquest's in-house legal adviser or appointed external legal advisers, and if appropriate from independent outside experts or others whose views in confidence may provide clarity in sorting out issues.

Here are some recommended practices to follow to protect the Principles. This list is not all-inclusive. There may be additional practices – implicit in the Principles or determined within individual newsrooms – that will further ensure credible and responsible journalism.

Ensuring the Truth Principle

Subterfuge newsgathering can be justified in certain circumstances, where it is necessary in order to expose the truth, but only where it serves the public interest and otherwise complies with the Code of Conduct of the Press Complaints Commission. (Always consult Newsquest Media Group Legal before embarking on such action).

In our general dealings however:

We will not lie.

We will not misstate our identities or intentions.

We will not fabricate.

We will not plagiarize.

We will not alter photographs to mislead readers.

We will not intentionally slant the news.

Using unnamed sources

The use of unnamed sources in published stories should be rare and only for important news. Whenever possible, reporters should seek to confirm news on the record. If the use of unnamed sources is required:

Use as sources only people who are in a position to know.

Corroborate information from an unnamed source through another source or sources and/or by documentary information.

Inform sources that reporters will disclose sources to at least one editor. Editors will be bound by the same promise of confidentiality to sources as are reporters.

Hold editors as well as reporters accountable when unnamed sources are used. When a significant story to be published relies on a source who will not be named, it is the responsibility of the senior news executive to confirm the identity of the source and to review the information provided. This may require the editor to meet the source.

Make clear to the reporters and to sources that agreements of confidentiality are between the newspaper and the sources, not just between the reporter and the sources. The newspaper will honour its agreements with sources. Reporters should make every effort to clear such confidentiality agreements with the editors first. Promises of confidentiality made by reporters to sources will not be overridden by the editors; however, editors may choose not to use the material obtained in this fashion.

Expect reporters and editors to seek to understand the motivations of a source and take those into account in evaluating the fairness and truthfulness of the information provided.

Make clear to sources the level of confidentiality agreed to. This does not mean each option must be discussed with the source, but each party should understand the agreement. Among the options are:

- a) The newspaper will not name them in the article;
- b) The newspaper will not name them unless a court compels the newspaper to do so;
- c) The newspaper will not name them under any circumstances.

All sources should be informed that the newspaper will not honour confidentiality if the sources have lied or misled the newspaper.

Make sure both sides understand what is being agreed to. For example:

- a) Statements may be quoted directly or indirectly and will be attributed to the source. This is sometimes referred to as "on the record."
- b) The information may be used in the story but not attributed to the source. This is sometimes referred to as "not for attribution" or "for background."
- c) The information will not be used in the story unless obtained elsewhere and attributed to someone else. This is sometimes referred to as "off the record."

Describe an unnamed source's identity as fully as possible (without revealing that identity) to help readers evaluate the credibility of what the source has said or provided.

Do not make promises you do not intend to fulfill or may not be able to fulfill.

Do not threaten sources.

Handling the wires

These Principles are intended to provide front-line guidance for locally generated material. Wire-service material already has been edited professionally. Major news agencies set their own policies and standards for the use of unnamed sources. Smaller agencies may be less reliable. Additional scrutiny often may be required.

Being fair

Because of timeliness or unavailability, it is not always possible to include a response from the subject of an allegation in a news story. Nevertheless:

We should make a good-faith effort to seek appropriate comment from the person (or organization) before publication.

When that is not feasible, we should be receptive to requests for a response or try to seek a response for a follow-up story.

Letters to the editor also may provide an appropriate means for reply.

Some public records will identify persons accused of wrongdoing. Publication of denials is not necessary in such circumstances.

Being independent

"Maintaining independence" helps establish the impartiality of news coverage. However, news staff are not discouraged from involvement in community activities, so long as this does not compromise the credibility of news coverage. When unavoidable personal or business interests could compromise the newspaper's credibility, such potential conflicts must be disclosed to the relevant line manager and, if relevant, to readers.

Investigative reporting

Aggressive and hard-hitting reporting is an honourable and often courageous way of fulfilling the media's moral duty as a public watchdog. It is encouraged. But investigative reporting by its nature raises issues not ordinarily faced in routine reporting. Here are some suggested procedures to follow when undertaking investigative reporting:

Involve more than one editor at the early stages and in the editing of the stories.

Question continually the premise of the stories and revise accordingly.

Follow the practices outlined in the use of sources.

Document the information in stories to the satisfaction of the senior editor.

Have a "fresh read" by an editor who has not seen the material as you near publication. Encourage the editor to read it sceptically, then listen carefully to and heed questions raised about clarity, accuracy and relevance.

Make certain that care, accuracy and fairness are exercised in headlines, photographs, presentation and overall tone.

Evaluate legal and ethical issues fully, involving appropriate colleagues, managers, lawyers or dispassionate outside parties in the editorial process. (For example, it may be helpful to have a technical story reviewed by a scientist for accuracy, or have financial descriptions assessed by an accountant).

Be careful about trading information with sources or authorities, particularly if it could lead to an impression that you are working in concert against an individual or entity.

Editing sceptically

Editors are the gatekeepers who determine what will be published and what will not be. Their responsibility is to question and scrutinize, even when it is uncomfortable to do so. Here are some suggested practices that editors can follow:

Take special care to understand the facts and context of the story.

Guard against assumptions and preconceived notions – including their own.

Ensure time and resources for sound editing. Nothing should be printed that has not been reviewed by someone else. When feasible, at least two editors should see stories before publication. Complex or controversial stories may require even more careful scrutiny.

Consider involving an in-house sceptic on major stories – a contrarian who can play the role of devil's advocate.

Challenge conventional wisdom.

Heed the "gut instinct." Don't publish a story if it doesn't feel right. Check it further.

Consider what may be missing from the story.

Consider how others – especially antagonists or sceptical readers – may view the story. What questions would they ask? What parts would they think are unfair? Will they believe it?

Be especially careful of stories that portray individuals purely as villains or heroes.

Beware of stories that reach conclusions based on speculation or a pattern of facts.

Protect against being manipulated by advocates and special interests.

Consider these questions: "How do you know? How can you be sure? Where is the evidence? Who is the source? How does he or she know? What is the supporting documentation?"

Watch carefully for red flags that give reason to be sceptical of news-gathering or editing conduct.

Don't be stampeded by deadlines, unrealistic competitive concerns or peer pressure.

Ensuring accuracy

Dedication to the truth means accuracy itself is an ethical issue. Each news person has the responsibility to strive for accuracy at each step of the process.

Be aware that information attributed to a source may not be factually correct.

Be sure the person quoted is in a position to know.

Be especially careful with technical terms, statistics, mathematical computations, crowd estimates and poll results.

Consider going over all or portions of an especially complicated story with primary sources or with outside experts. However, do not surrender editorial control.

Don't make assumptions. Don't guess at facts or spellings. Asking the person next to you is not "verification" – he or she could be wrong too.

Improve note taking. Consider backing up your notes with a recording device when ethically and legally appropriate.

Be wary of newspaper library clippings, which may contain uncorrected errors.

Develop checklists of troublesome or frequently used names, streets, titles, etc.

Understand the community and subject matter. Develop expertise in areas of specialized reporting.

Re-read stories carefully after writing, watching especially for errors of context and balance as well as for spelling and other basic mistakes.

Use care in writing headlines. Do not stretch beyond the facts of the story.

Follow a simple rule on the copy desk to double-check the accuracy of headlines: "Find the headline in the story." (For example, if the headline says, "Three die in crash," go to the story and count the dead and be certain they died in the crash.)

Consider using "accuracy checks" as an affirmative way to search out errors and monitor accuracy. (Accuracy checks are a process by which published stories are sent to sources or experts asking for comment on accuracy, fairness or other aspects.)

Correcting errors

When errors occur, the newspaper has an ethical obligation to correct the record and minimize harm.

Errors should be corrected promptly. But first, a determination must be made that the fact indeed was in error and that the correction itself is fully accurate.

Errors should be corrected with sufficient prominence that readers who saw the original error are likely to see the correction. This is a matter of the editor's judgment.

Although it is wise to avoid repeating the error in the correction, the correction should have sufficient context that readers will understand exactly what is being corrected.

Errors of nuance, context or tone may require clarifications, editor's notes, editor's columns or letters to the editor.

When the newspaper disagrees with a news subject about whether a story contained an error, editors should consider offering the aggrieved party an opportunity to express his or her view in a letter to the editor.

Corrections should be reviewed before publication by a senior editor who was not directly involved in the error. The editor should determine if special handling or legal advice is required.

Errors should be corrected whether or not they are called to the attention of the newspaper by someone outside the newsroom.

Factual errors should be corrected in most cases even if the subject of the error does not want it to be corrected. The rationale for this is rooted in the *Truth Principle*. It is the newspaper's duty to provide accurate information to readers. An exception may be made for trivial errors or when the correction of a relatively minor mistake would result in public ridicule or greater harm than the original error.

Newsroom staffers should be receptive to complaints about inaccuracies and follow up on them.

Newsroom staffers have a responsibility to alert the appropriate editor if they become aware of a possible error in the newspaper.

Communication

It is the responsibility of the relevant Regional Managing Director and the Editor to communicate these Principles to staff.

NMG Legal

Update 2011