

The right of the editor to edit without interference from general management is recognised as an inherent part of the Group's publishing policy – Group Policy Guideline 4.4 refers.

It is possible, however, that an editor may fail to follow the rules and guidelines governing ethical or legal integrity and as a result brings his/her publication into disrepute. There may also be occasions when an editor is subject to disciplinary procedure for other reasons.

The following is designed to ensure that when an editor is subjected to Disciplinary, Capability or Grievance procedures, the right to editorial freedom is maintained. It also offers editors who are concerned about interference from local management in matters of editorial judgement in relation to content, the right to raise them with senior Group management and to have such concerns properly investigated.

Procedure:

1. In the first instance, local company procedures laid down for the investigation of each of the areas of Disciplinary, Capability or Grievance should be followed.
2. Where an editor is found to be in breach and issues of editorial independence are considered by either party to be at stake, he/she will have the right of appeal to the Chief Executive who, if he considers that there are bona fide grounds for a full investigation, will convene a specially constituted panel which will be chaired by the Director of HR, and will include a senior Group Manager, the Editorial Development Executive and two editors from the Editorial Review Group unconnected with the particular case. The appeal will be heard within one month of the complaint being raised and the editor may be accompanied by a supporter of his choice. The Chief Executive will be obliged to report all requests for an investigation in writing to the main Board together with an explanation of his reasons for declining any such request which will also be sent to the editor concerned.
3. Such a specially constituted panel will also hear evidence from any editor who feels that there has been undue interference from management in matters of editorial judgement in relation to content. The same procedures as outlined above will apply.
4. The key role of the panel will be to investigate whether editorial freedom has been compromised. It will consider areas within the confines of legal and ethical good taste and will also take into account the industry's code of practice as laid down by the Press Complaints Commission. In every such case, after hearing evidence from all parties, the panel will make a written judgement. This judgement will be circulated to the key parties involved, who will be obliged to follow its recommendations.
5. Any of the parties involved who disagree with the findings of the panel will have a right of appeal to the Chief Executive who, if an acceptable outcome cannot be agreed, will refer the matter to a mutually acceptable independent expert for review. In such circumstances, the Chief Executive will present his recommendations to the Board of Johnston Press plc, together with all

relevant information including the unedited views of the independent expert, for its final decision on the matter which will then be communicated to the parties involved.