

## **MANSI POLICY STATEMENT**

### **Whistleblower Policy**

A whistleblower as defined for purposes of this policy is an employee of Mid-Atlantic Newspaper Services Inc. (the "Company") who reports an activity that he/she considers illegal or dishonest to one or more of the parties specified in this Policy. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities.

The Company is the employer of all employees who provide services to MANSI itself, the Pennsylvania Newspaper Association, the Pennsylvania Newspaper Association Foundation, the National Conference of Editorial Writers, the National Conference of Editorial Writers Foundation or the Association of American Cartoonists. This Policy is meant to cover reports by MANSI employees regarding any of these companies.

The Company has established an Employment Policy Manual governing employees' proper performance of their duties and responsibilities. Examples of illegal or dishonest activities are contained in the Employment Policy Manual. Violations of federal, state or local laws; billing for services not performed or for goods not delivered; and other fraudulent financial reporting are violations of both the Employment Policy Manual as well as this Whistleblower Policy. If an employee has knowledge of, or a concern about what might be illegal or dishonest fraudulent activity, the employee is to contact his/her immediate supervisor or the Vice President for Human Resources. The employee must exercise sound judgment to avoid baseless allegations. An employee who intentionally files a false report of wrongdoing will be subject to discipline up to and including termination.

Whistleblower protections are provided in two important areas -- confidentiality and to protect against retaliation. Insofar as possible, the confidentiality of the whistleblower will be maintained. However, a whistleblower's identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals their legal rights of defense. The Company will not retaliate against a whistleblower. Any whistleblower who believes he/she is being retaliated against must contact the Vice President for Human Resources immediately. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged, investigated, and verified.

All reports of perceived illegal or dishonest activities will be promptly submitted to the President of MANSI who is responsible for investigating and coordinating corrective action. Employees with any questions regarding this policy should contact the Vice President of Human Resources.